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# South Downs National Park Authority - Water Cycle Study Addendum

**Version 1**

Prepared for  
South Downs National  
Park Authority

Date  
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## Document Status

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# Contract

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This report describes work commissioned by the South Downs National Park Authority by an instruction dated 01 September 2023. The Client's representative for the contract was Katharine Stuart of South Downs National Park. Hannah Booth of JBA Consulting carried out this work.

## Purpose and Disclaimer

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The methodology adopted and the sources of information used by JBA in providing its services are outlined in this Report. The work described in this Report was undertaken between July 2025 and December 2025 is based on the conditions encountered and the information available during the said period. The scope of this Report and the services are accordingly factually limited by these circumstances.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by JBA has not been independently verified by JBA, unless otherwise stated in the Report.

Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. JBA specifically does not guarantee or warrant any estimates or projections contained in this Report.

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## Acknowledgements

JBA Consulting would like to thank South Downs National Park Authority, Southern Water, Thames Water, Portsmouth Water and South East Water

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# Contents

<b>1</b>	<b>Introduction</b>	<b>7</b>
1.1	Terms of Reference	7
<b>2</b>	<b>Authorities responsible for Water Resource and Wastewater Management in SDNPA</b>	<b>7</b>
2.1	Water Resources	7
2.2	Wastewater Undertakers	8
<b>3</b>	<b>Proposed Growth</b>	<b>10</b>
3.1	Sites for assessment	10
<b>4</b>	<b>Proposed Growth Assessment</b>	<b>13</b>
4.1	Regulation 18 Local Plan Consultation	13
4.2	Further assessment	14
<b>A</b>	<b>Consultation responses</b>	<b>A-1</b>
<b>B</b>	<b>RAG Assessment</b>	<b>B-2</b>
List of Figures		
	Figure 2.1 Water supply areas	8
	Figure 2.2 Water supply areas	9
List of Tables		
	Table 3-2 Sites for Assessment- Proposed New Allocations	11
	Table 3-2 RAG descriptions- Water Supply	15
	Table 3-2 RAG descriptions- Wastewater Network Assessment	15
	Table 3-2 RAG descriptions- Wastewater Treatment Works Assessment	15

## Abbreviations

JBA	Jeremy Benn Associates
PW	Portsmouth Water
RAG	Red / Amber / Green assessment
SDNP	South Downs National Park
SDNPA	South Downs National Park Authority
SEW	South East Water
SU	Sewerage Undertaker
SW	Southern Water
WaSC	Water and Sewerage Company
WCS	Water Cycle Study
WRMP	Water Resource Management Plan
WTW	Water Treatment Works
WwTW	Wastewater Treatment Works

# 1 Introduction

## 1.1 Terms of Reference

JBA Consulting was commissioned by the South Downs National Park Authority (SDNPA) to undertake a Water Cycle Study (WCS) to support their draft Local Plan (Regulation 18). The Local Plan period is intended to run between 2022 and 2042. The WCS report was issued in January 2025.

New homes require the provision of clean water, safe disposal of wastewater and protection from flooding. Strategic planning for new homes requires careful consideration to ensure there are sufficient water resources, and available capacity in the water supply and wastewater network, protecting existing customers and the environment.

To assess the impact of proposed growth within the Local Plan on the existing water supply and wastewater network, the water supply and wastewater undertakers were consulted to identify whether sufficient capacity was available to accommodate new growth and to identify locations where additional infrastructure was required. This was not able to be undertaken within the timescales of the main WCS report, and therefore, this report has been prepared, which sets out the findings from this consultation.

## 2 Authorities responsible for Water Resource and Wastewater Management in SDNPA

Within the SDNP, there are a number of authorities and regulators responsible for or involved in supplying, managing, and overseeing water supply and wastewater. The companies which cover each aspect are outlined in the following sections.

### 2.1 Water Resources

Four water companies provide water supply services for the SDNPA area. These are Portsmouth Water, Southern Water, South East Water and Thames Water, which are shown in Figure 2.1. Thames Water only supplies an area of approximately 0.5 km<sup>2</sup>.

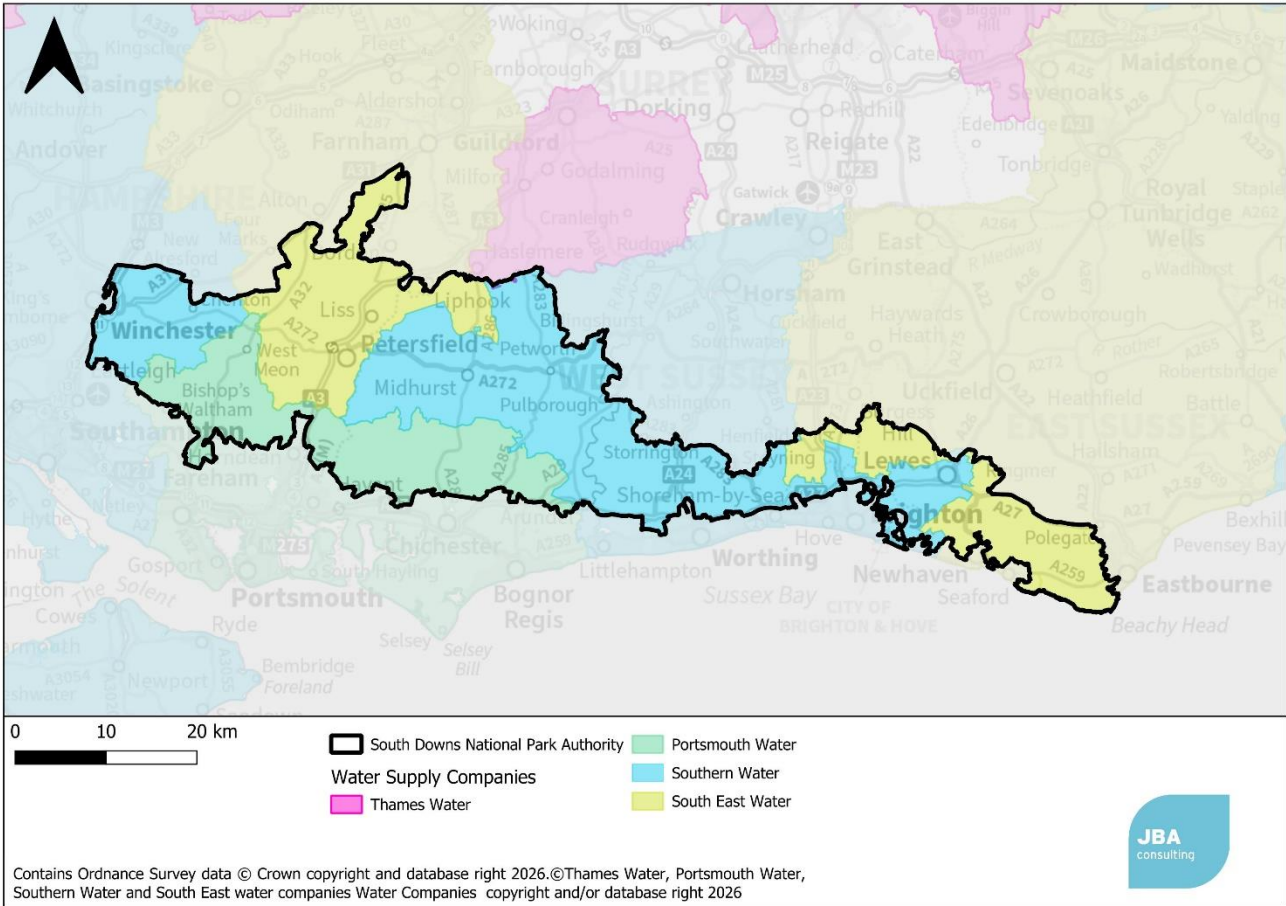


Figure 2.1 Water supply areas

## 2.2 Wastewater Undertakers

Two water companies provide wastewater services for the SDNPA area. These are Southern Water and Thames Water, which are shown in Figure 2.2.

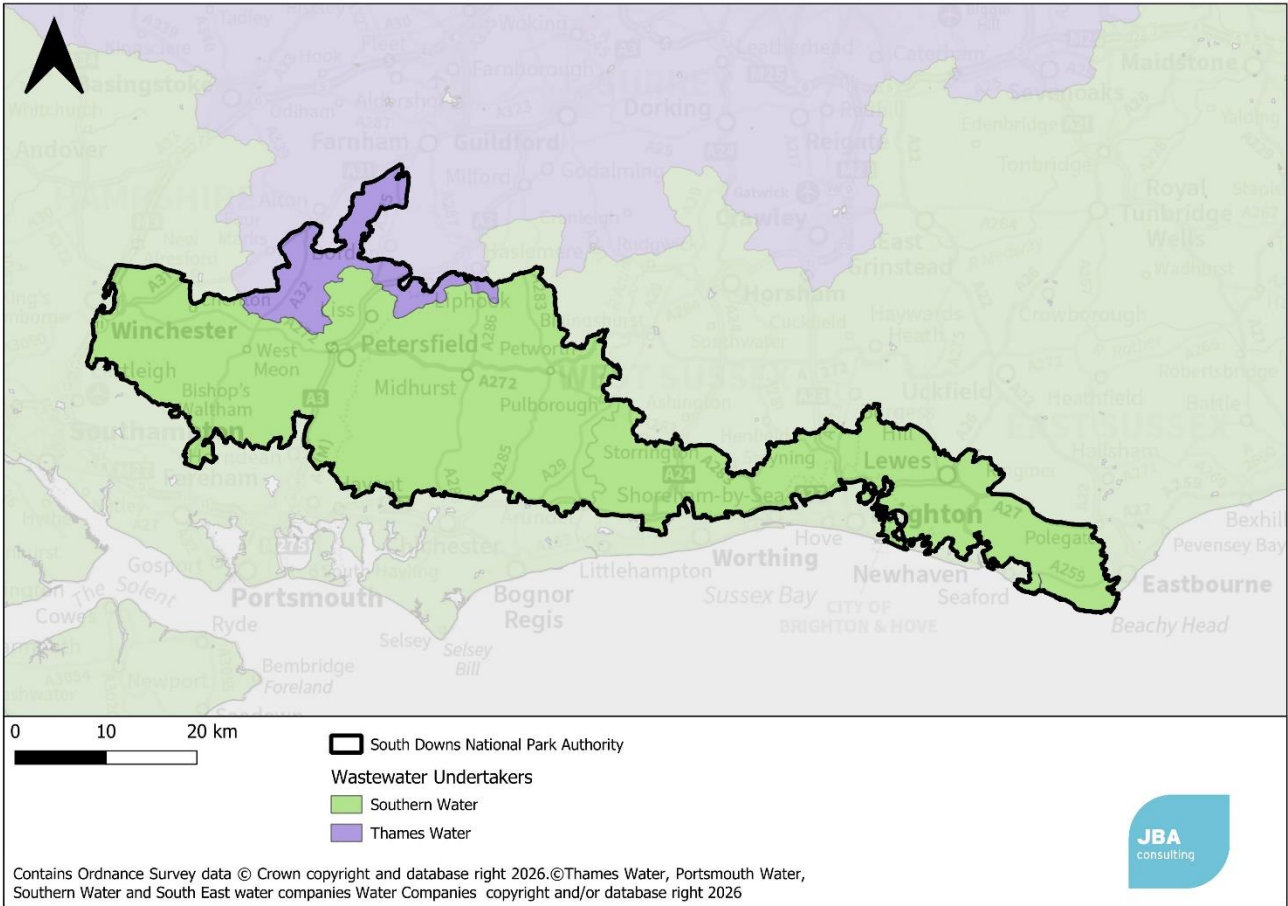


Figure 2.2 Water supply areas

## 3 Proposed Growth

### 3.1 Sites for assessment

The SDNPA provided the sites for assessment by the water companies. These included 28 new sites proposed and 48 unimplemented existing allocations. The list of those sites included is provided below in Table 3-1 and Table 3-2.

Table 3-1 Sites for Assessment- Unimplemented existing allocations

Site name
Shoreham Cement Works
North Street Quarter
Former Allotments Alfriston
Kings Ride Alfriston
Land at Clements Close Binsted
New Barn Stables, The Street, Binsted
Land South of the A272: at Hinton Marsh, Cheriton
Land South of London Road, Coldwaltham
Land at Park Lane, Droxford
Cowdray Works Yard, Easebourne
Land at Elm Rise, Findon
Soldiers Field House, Findon
Land at Petersfield Road, Greatham
Land at Fern Farm, Greatham
Land at Itchen Abbas House, Itchen Abbas
Land at Castelmer Fruit Farm, Kingston Near Lewes
Land at Old Malling Farm, Lewes
Malling Brooks, Lewes
Holmbush Caravan Park, Midhurst
Land at the Fairway, Midhurst
Offham Barns, Offham
Land at Ketchers Field, Selborne
Land at Pulens Lane, Sheet

Site name
Land at Loppers Ash, South Harting
Land North of the Forge, South Harting
Stedham Sawmill, Stedham
Land South of Church Road, Steep
Land South of Heather Close, West Ashling

Table 3-2 Sites for Assessment- Proposed New Allocations

Site name
Land west of Liphook/Land at Westlands Park
County Hall, St Anne's Crescent, Lewes
East Sussex College, Mountfield Road, Lewes
Alfriston Court, Sloe Lane, Alfriston
East Street Farm, Amberley
Land south of Lovell Gardens, Binsted
Land at Greenways Lane and Kiln Lane, Buriton
Land East of Coombe Crescent, Bury
Land east of A286: and north of Mill Lane, Cocking
Land at Beechwood Lane, Cooksbridge
Land rear of 71: East End Lane, Ditchling
Midhurst Community Hospital and 1-2 Rotherfield Mews, Easebourne
Land at former Easebourne School, Easebourne
Land west of Budgenor Lodge, Easebourne
Land at Hawksfold, Fernhurst
Former Allotments north of The Quadrangle, Findon
Land east of Lodge Lane, Keymer, Hassocks
Land at Beaumont, Wellgreen Lane, Kingston
Audiburn Farm, Ashcombe Lane, Kingston
Land behind the White Hart, 55: High Street, Lewes
Land at the rear of 49-55: St Anne's Crescent, Lewes
Springman House, 8 North Street, Lewes

Site name
The Shelleys Hotel, 136: High Street, Lewes
Land at Westlands, Liphook
Land West of The Street, Lodsworth
Land east of Pitsham Lane, Midhurst
Land at Forest Road, Midhurst
Former Bus Depot, Pitsham Lane, Midhurst
Land adjacent to The Grange Car Park, Midhurst
Land west of Valentines Lea, Northchapel
Land at Old Green Farm, Owslebury
Land at Whites Hill Farm, Owslebury
Land at Penns Place, Petersfield
Land south of Paddock Way, Petersfield
Land at Festival Hall, Petersfield
Land at Drum Court, The Spain, Petersfield
Land at Windward, Reservoir Lane, Petersfield
The Courtyard, Heath Road, Petersfield
Land at Rotherbridge Lane, Petworth
Land north of Northend Close, Petworth
Land west of Village Hall, Rogate
Land at Seaford Golf Club, Firle Road, Seaford
Land off Merryfield Road, Sheet
Land off Steepdown Road, Sompting
Land north of Winchester Road, Stroud
Land north of Dodds Lane, Swanmore
Land north of Hewlett Close, Twyford
Land at Farnham and Station Roads, West Liss

## 4 Proposed Growth Assessment

### 4.1 Regulation 18 Local Plan Consultation

#### 4.1.1 Overview

In early 2025, the water companies were consulted on the Regulation 18 Local Plan and were asked to provide comments. These responses have been collated in Appendix A.

As part of these assessments, neither South East Water nor Portsmouth Water undertook a specific evaluation of the sites proposed for the Local Plan. Thames Water and Southern Water have provided commentary on the sites within their supply area.

A summary of the responses provided for each water company has been outlined in the following sections.

#### 4.1.2 South East Water

South East Water has indicated that their recently published WRMP24 considers the housing trajectory figures from the South Downs available at the time they developed their plan, and they are confident that their plans accommodate the level of growth received from the Council in 2023. They further indicated they would be happy to receive any updated site allocation information, including forecasted dwellings, to ensure that their plans remain aligned and sufficient water is available within the local area to meet a supply-demand balance.

They also noted that as applications are made through our developer enquiry process, they will work with local authorities and developers to carry out the appropriate detailed network modelling assessments, to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. They indicated they are committed to ensure engagement and communication at the earliest opportunity.

#### 4.1.3 Portsmouth Water

In their response, Portsmouth Water provided commentary on their opinion on the proposed Local Plan Policies. No specific commentary was made regarding water supply infrastructure in their response.

#### 4.1.4 Southern Water

Southern Water has provided commentary on the existing unimplemented allocations within their response. This commentary has been included within Appendix B.

With regards to proposed allocations, Southern Water has stated the below:

"Southern Water will assess wastewater and water network capacity in relation to the number of dwellings proposed for any allocated development site during the planning process, any capacity constraints will be managed through the regulatory funding

mechanism for the reinforcement of our network; currently that mechanism is the Infrastructure Charge paid by developers.

Whilst assessing capacity during the planning application process, should it be determined that the wastewater or water provisions for the development will cause detriment to the operation of the network, we will progress the necessary reinforcement work through our capital delivery programme. The local plan review has stated the following -

5.2 The sites identified as potential allocations in this section are those that met the Land Availability Assessment criteria of suitability, availability and achievability and were further assessed through the Integrated Impact Assessment and the Site Selection Paper ([www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/regulatory-assessments/integrated-impact-assessment-iaa-and-scoping-report/](http://www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/regulatory-assessments/integrated-impact-assessment-iaa-and-scoping-report/) and [www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/homes-and-economy/site-selection-major-development/](http://www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/homes-and-economy/site-selection-major-development/)). However, they are still very much provisional allocations and further work will need to be undertaken before they can be included within the final Plan.

As such, we have not undertaken any capacity checks of our networks in relation to the proposals in the Proposed New Allocations section at this stage.

However, we would welcome early engagement from South Downs National Park Authority once there is more certainty in regard to the allocations of sites and the number of dwellings.

This will allow us to determine whether new infrastructure or upgrades to existing infrastructure will be required to serve a development.

We support the inclusion of the following policy requirements for those sites, where they are applicable.”

#### 4.1.5 Thames Water

Thames Water has provided general commentary on wastewater and infrastructure, noting suggestions for policy text and comments on flood risk and drainage.

Specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites were provided and it has been noted that more detailed modelling may be required to refine the requirements for these sites.

## 4.2 Further assessment

As only some of the water companies had provided information regarding the proposed sites, further assessment was requested from those that did not, in the form of a RAG assessment of the sites, to determine whether there is sufficient water supply and sewerage capacity.

The water companies were provided the GIS shapefiles of the sites listed in Table 3-2 and were asked to undertake an internal assessment to identify the impact of the site on the

wastewater and water supply network and provide any comments on each site where appropriate.

The following Red Amber Green (RAG) criteria was used to score each site, as shown in Table 4-1.

Table 4-1 RAG descriptions- Water Supply

<p><b>GREEN</b> Capacity available to accommodate growth</p>	<p><b>AMBER</b> Infrastructure and/or treatment work upgrades are required to serve proposed growth, but no significant constraints to the provision of this infrastructure have been identified</p>	<p><b>RED</b> Infrastructure and/or treatment upgrades will be required to serve proposed growth. Major constraints have been identified.</p>
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Table 4-2 RAG descriptions- Wastewater Network Assessment

<p><b>GREEN</b> No infrastructure concerns in relation to this development</p>	<p><b>AMBER</b> Modelling may be required to understand the impact of development</p>	<p><b>RED</b> Modelling will be required and it is anticipated that upgrades to the network will be necessary</p>
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Table 4-3 RAG descriptions- Wastewater Treatment Works Assessment

<p><b>GREEN</b> No infrastructure concerns in relation to this development</p>	<p><b>AMBER</b> Aware of capacity concerns at the sewage treatment works and a scheme is planned to accommodate future growth.</p>	<p><b>RED</b> There are concerns about the capacity at the sewage treatment works to accommodate future growth.</p>
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The consultation responses from the Local Plan Review and subsequent RAG assessment request for each site have been collated and summarised in Appendix B. No response was received from South East Water.

# A Consultation responses



South Downs National Park Authority

By Email Only - [planningpolicy@southdowns.gov.uk](mailto:planningpolicy@southdowns.gov.uk)

Date

7 March 2025

Contact

[planning.policy@southernwater.co.uk](mailto:planning.policy@southernwater.co.uk)

Dear Sir/Madam,

### **South Downs National Park Local Plan – Regulation 18 Consultation**

Thank you for consulting Southern Water on the South Downs National Park Local Plan Review.

Southern Water is a statutory Wastewater and Water service provider for South Downs National Park.

Please find further below our comments in respect of the Plan.

We hope that you find our response useful and look forward to being kept informed of progress.

Yours sincerely,

Ryan Lownds  
Strategic Planning Lead  
Hampshire, West Sussex & Isle of Wight



# South Downs National Park Local Plan Review

## Reg 18 Consultation

### Southern Water Response

#### **CORE POLICY SD2: REGENERATIVE DESIGN, ECOSYSTEM SERVICES AND ENVIRONMENTAL NET GAIN**

Southern Water is supportive of Policy SD2, in particular the opportunities set out below supporting the conservation of water, flood risk management and a reduced level of pollution, which are all at risk of increase due to climate change factors.

- a) *Sustainably manage land and water environments;*
- c) *Conserve water resources and improve water quality;*
- d) *Manage and mitigate the risk of flooding;*
- e) *Improve the National Park's resilience to, and mitigation of, climate change;*
- i) *Reduce levels of pollution;*

Climate Change will bring greater variability of our weather with warmer wetter winters and hotter drier summers. The impacts we will see will be more intense summer storms that exceed the capacity of the drainage and wastewater networks and cause localised flooding.

Climate change is expected to have an impact on the risk of flooding in several wastewater systems in the wider area, and the flooding risk will increase by 2050 in all wastewater systems unless measures are taken to manage and reduce these risks.

Adaptation will need to consider options for reducing the volume of surface water entering the sewer network in order to avoid the need for significant increases in the capacity of the existing drainage and wastewater networks.

We need planning policy to recognise that climate change now demands we re-think and re-design communities and ensures that rainwater will not run off homes and surfaces so fast that it causes flooding and storm discharges into rivers and seas.

In terms of flood risk, better rainwater management is key to achieving not only a reduced risk of flooding, but also a reduction in storm overflow releases and reduced demand on water resources. To help achieve this, Southern Water supports Planning Policy that prioritises on-site surface water management through effective provision of Sustainable Drainage Systems (SuDS).

We will refuse any request to discharge surface water into our foul only sewer network, on the grounds that the discharge is prejudicial to our sewerage network and detrimental to the environment. This includes where the surface water hierarchy has been followed and all alternative options have been exhausted.



In addition, a surface water discharge to any combined sewer will only be permitted under exceptional circumstances. This approach ensures that we work together to better protect the environment, improve water quality, and reduce flood risk.

This also supports our work to separate rainwater from sewage at source to meet storm overflow reduction targets under Defra's Storm Overflows Discharge Reduction Plan, as well as to reduce the number of sewer flooding incidents that are caused by hydraulic overload of our sewer network during rainfall periods.

The above is supported by our surface water management policy, which is available to [view on our website](#).

Local Plans can play a key role in preventing additional surface water entering wastewater sewer networks through effective Policy and we welcome the management and mitigation of flood risk being an area of focus.

In regard to the conservation of water and adapting to climate change, the South East of England is classified as a seriously water stressed area by the Environment Agency as it has the lowest levels of rainfall and high population density. Southern Water are currently investigating ways to tackle leakage, targeting households to save water and investigating new areas of investment to safeguard future water supplies.

This all comes at a time when climate projections point to drier and warmer summers with more extreme weather events and more frequent/severe droughts. These events are expected to result in a higher demand for water whilst adversely impacting supply.

The more water that is abstracted from the ground to meet this growing demand the less water there is for rivers, streams and wildlife. This means that there are a number of competing demands on the use of water. This balancing act is anticipated to become even more challenging in the future, when taking into account an increased population (through additional development) and the likely effects of a changing climate on the availability of water resources.

This means that Local Plans have a key role in ensuring that new development is designed to be water efficient and help with the broader conservation of water supply.

## Policy SD5: Design

Southern Water supports Policy SD5, in particular we support design principle (b) as set out below.

*1. Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area. The following design principles should be adopted as appropriate:*

*b) Achieve effective and high quality layout making space for above ground multifunctional, connected and sequential SuDS and routes for people and wildlife, taking opportunities to connect GI, with an appropriate street hierarchy, and sensitive integration of vehicle parking to avoid car and highway design dominance and street clutter;*



We believe SuDS should be a requirement for all new development. Whilst some parts of the sewer network were originally designed to accommodate surface water, the expansion of towns and cities, in particular of 'urban creep' can exacerbate capacity issues.

As stated in Water UK's 21st Century Drainage Programme; *"The country's built environment is constantly changing and "urban creep" – home extensions, conservatories and paving over front gardens for parking – can all add to the amount of water going into our sewers and drains. Green spaces that would absorb rainwater are covered over by concrete and tarmac that will not. In fact, studies show that "urban creep" results in a larger increase in predicted flooding than new housing, because it adds more rainwater to these systems'*. Therefore, any areas utilised for SuDS should be safeguarded from future alterations or development that would impede their effectiveness.

In terms of flood risk, better rainwater management is key to achieving not only a reduced risk of flooding, but also a reduction in storm overflow releases and reduced demand on water resources. To help achieve this, Southern Water supports policies that prioritise on-site surface water management through effective SuDS provision.

## **Policy SD10: International Sites**

### **STRATEGIC POLICY NEW4: ARUN VALLEY SPA/SAC/RAMSAR – WATER NEUTRALITY**

Southern Water strongly supports STRATEGIC POLICY NEW4: ARUN VALLEY SPA/SAC/RAMSAR – WATER NEUTRALITY, this policy has been introduced through the Regulation 18 consultation and has been reviewed by Southern Water in terms of the description of its water supply provision and for consistency with other water neutrality policies within the Sussex North Water Resource Zone (WRZ).

The Policy accurately sets out the requirements developers need to meet to achieve water neutrality, according to studies undertaken by relevant stakeholders, and we welcome the comprehensive and detailed guidance that it provides.

### **STRATEGIC POLICY SD48: CLIMATE CHANGE AND SUSTAINABLE USE OF RESOURCES**

Southern Water fully supports Policy SD48, in particular Policy Requirement (3) as set out further below, as it aligns with our Target 100 programme which aims to help our existing customers to reduce their water consumption to 100 litres per person per day, whilst we work to reduce network leakage by 40% by 2040. Establishing a 100l/p/d standard or lower for new development will contribute to a more comprehensive approach to driving down water consumption, without which it will be harder to achieve meaningful savings.

The Policy helpfully highlights the challenge we collectively face in securing a resilient water supply for the future in the face of climate change, population growth and reductions in abstractions from the county's rivers. Promoting water efficiency in new development is a critical step to addressing this, but new water sources also need to be found as part of the solution to maintaining essential supplies to both existing and new homes and businesses.

**3. All development proposals will be required to meet the following internal maximum water consumptions standards:**



- a) Residential and visitor accommodation: predicted mains water consumption ≤ 90 litres/person/day
- b) Major non-residential development: Achieve at least 70% of available BREEAM Water credits

## STRATEGIC POLICY SD17: PROTECTION OF THE WATER ENVIRONMENT

As a statutory water service provider for the South Downs National Park, Southern Water welcomes and supports Policy SD17, which sets out a detailed and comprehensive approach to protecting the water environment.

During our assessments, we noted that some sites were located within a Groundwater Source Protection Zone, and as such we fully support the Policy Requirement (6) as set out further below. Developers will need to consult with the Environment Agency to ensure the protection of the public water supply source is maintained and inform Southern Water of the outcome of this consultation.

*6. Development within Groundwater Source Protection Zones (SPZs) will only be permitted provided it can be demonstrated that there will not be any foreseeable adverse impact on the quality of the groundwater source and provided there is no risk to its ability to maintain a water supply or contribute to nature conservation.*

## STRATEGIC POLICY SD49: FLOOD RISK MANAGEMENT

Southern Water is a statutory wastewater service provider for South Downs National Park, and we strongly support Policy SD49 that seeks to reduce the risk of flooding,

You may be aware of our surface water management policy [view on our website](#) which states that we will refuse any request to discharge surface water into our 'foul only' sewer network, on the grounds that the discharge is detrimental to our sewerage network and can be harmful to the environment. This includes where the surface water hierarchy has been followed and all alternative options have been exhausted. In addition, a surface water discharge to any combined sewer will only be permitted under exceptional circumstances.

This approach ensures that we work together to better protect the environment, improve water quality, and reduce flood risk. It also supports our work to separate rainwater from sewage at source to meet storm overflow reduction targets under Defra's Storm Overflows Discharge Reduction Plan, as well as to reduce the number of sewer flooding incidents that are caused by hydraulic overload of our sewer network during periods of sustained rainfall.

Therefore, we recommend the following additional Policy Requirement for Policy SD49: Flood Risk Management.

Surface water from new development will not be permitted to discharge to the foul or combined sewer network, to minimise the risk of sewer flooding and protect water quality,

## DEVELOPMENT MANAGEMENT POLICY SD50: SUSTAINABLE DRAINAGE SYSTEMS

We welcome and fully support Policy SD50, as we believe SuDS should be a requirement for all new development. Whilst some parts of the sewer network were originally designed to accommodate surface water, the expansion of towns and cities, in particular of 'urban creep' can exacerbate capacity issues.

As stated in Water UK's 21st Century Drainage Programme; "*The country's built environment is constantly changing and "urban creep" – home extensions, conservatories and paving over front gardens for parking – can all add to the amount of water going into our sewers and drains. Green spaces that would absorb rainwater are covered over by concrete and tarmac that will not. In fact, studies show that "urban creep" results in a larger increase in predicted flooding than new housing, because it adds more rainwater to these systems*". Therefore, any areas utilised for SuDS should be safeguarded from future alterations or development that would impede their effectiveness.

In terms of flood risk, better rainwater management is key to achieving not only a reduced risk of flooding, but also a reduction in storm overflow releases and reduced demand on water resources. To help achieve this, Southern Water supports policies that prioritise on-site surface water management through effective SuDS provision.

As previously advised, we will refuse any request to discharge surface water into our 'foul only' sewer network, on the grounds that the discharge is detrimental to our sewerage network and can be harmful to the environment. This includes where the surface water hierarchy has been followed and all alternative options have been exhausted. In addition, a surface water discharge to any combined sewer will only be permitted under exceptional circumstances.

This approach ensures that we work together to better protect the environment, improve water quality, and reduce flood risk. It also supports our work to separate rainwater from sewage at source to meet storm overflow reduction targets under Defra's Storm Overflows Discharge Reduction Plan, as well as to reduce the number of sewer flooding incidents that are caused by hydraulic overload of our sewer network during periods of sustained rainfall.

Therefore, we recommend the following additional Policy Requirement for Policy SD50: Sustainable Drainage Systems.

*3 All surface water management and drainage, including SuDS, should be designed to achieve the following criteria applied proportionately to the development proposals*

- i. *Ensures that surface water from new development does not discharge to the foul or combined sewer network, to minimise the risk of sewer flooding and protect water quality.*

The above is supported by our surface water management policy, which is available to [view on our website](#).

## CORE POLICY SD26: SUPPLY OF HOMES

Southern Water supports Policy SD26 and we recognise that target housing numbers may increase over the local plan period in question, however it is vitally important that the necessary wastewater and water infrastructure is in place to serve new development, as required.

You may be aware that Southern Water will assess wastewater network capacity in relation to the flows proposed for a development site during the planning process (when consulted), any capacity constraints will be managed through the regulatory funding mechanism for the reinforcement of our network; currently that mechanism is the Infrastructure Charge paid by developers.

Whilst assessing capacity during the planning application process, should it be determined that the flows from the development will cause detriment to the operation of the sewer, we will progress the reinforcement work through our capital delivery programme.

Note that the catalyst for progression is that the site receives **outline planning approval**. This is to ensure that there is an element of certainty that the development will progress and therefore funding is being utilised to provide reinforcement of the network in the right locations at the right time. It also ensures that there is not a misuse of funds through us delivering reinforcement work and then the development does not move forward.

The above process will ensure that any development does not contribute to any existing flooding issues on a sewer catchment through the discharge of foul flows from the new dwellings. However, it is also vital that surface water is managed on site through sustainable drainage systems to ensure that there is no surface water run-off into the sewer network and that the discharging of surface water to a foul or combined sewer is not permitted.

For development sites where capacity constraints have been identified, we will ask for planning policy and conditions that stipulate the phasing of the occupation of the development whilst we deliver the required network reinforcement. This is required as we have limited powers to prevent connections to our network, even when capacity is limited; for example, under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice.

An example of the policy wording that is used where there are capacity constraints is set out below, this supersedes previous wording which stipulated a connection at the nearest point of capacity.

*Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.*

Using the planning process in this way is supported by the **National Planning Policy Guidance (NPPG)** section dealing with water supply, wastewater and water quality (Para 20) "If there are concerns arising from a planning application about the capacity of wastewater infrastructure, applicants will be asked to provide information about how the proposed development will be drained and wastewater dealt with...The timescales for works to be carried out by the sewerage company do not always fit with development needs. In such cases, local planning authorities will want to consider how new development can be phased, for example so it is not occupied until any necessary improvements to public sewage system have been carried out."



Note that this is applicable to upgrades of our sewer network and any capacity constraints at a wastewater treatment works is addressed through a different funding mechanism, that being the delivery of investment through our business plan.

Wastewater Treatment Works (WTWs) treat wastewater collected from homes and businesses within their 'catchment' via a network of connecting pipes and pumping stations. WTWs are significant assets, upgrades to which are funded through the water industry's 5 yearly investment plan which sets out spending requirements over the next 5 year period (AMP) using customer generated income.

Therefore, we welcome early engagement on any new site allocations, once they have been confirmed, to ensure that we can assess the impact on our infrastructure, and we encourage planning referrals during the planning process.

## **STRATEGIC POLICY SD42: INFRASTRUCTURE**

Southern Water supports Policy SD42, and we would welcome an additional Policy Requirement that provides for new or improved water or wastewater infrastructure to support development.

The National Planning Policy Framework (NPPF 2024) outlines the importance of achieving sustainable development and paragraph 20 states.

*Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for:*

*b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

Also, the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'.

Therefore, we recommend the following Policy Requirement for Policy SD42.

*4. Proposals for new and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community.*

## Existing Unimplemented Allocations

### Policy Strategic Site Policy SD56: Shoreham Cement Works

Southern Water is the wastewater undertaker and water supplier for this area. As stated in the Shoreham Cement Works Area Action Plan 2022 (wording below), the site is currently not connected to a Southern Water clean water mains or wastewater sewerage network.

#### **5C Water, Drainage and Flooding**

*5.32 The SDNPA commissioned a number of studies in 2018 and 2021. JBA Consulting undertook a Preliminary Geotechnical and Geo-Environmental Assessment Report<sup>16</sup> and a Preliminary Building Condition, Safety and Demolition Assessment Report<sup>17</sup> in 2018. In 2021, the SDNPA commissioned CGL to undertake a Programme of Works Report for Land Contamination<sup>18</sup> and Motion to prepare a Foul Water Drainage Strategy<sup>19</sup>.*

*5.33 The site is not connected to a Southern Water clean water mains or wastewater sewerage network. There is an existing private system of foul and surface water drains, including outfalls to the River Adur and two existing discharges of treated effluent to the ground and surface water.*

*5.34 The foul water drainage strategy for the site is that wastewater would drain from high point to low point (**Riverside**). There are two options for the site, which could either be connected to the existing sewer network with a new pumping station or a new waste water treatment works could be provided on site.*

Should it be decided that the foul water drainage strategy will entail a discharge to the public wastewater sewerage network, then we would welcome early engagement regarding the drainage plans for our consideration. We would also welcome early visibility of the plans for water supply to the development.

This can be done via the developer making a pre planning enquiry application to us on our website [Southern Water | Pre-Planning Enquiries](#) and by ensuring that the planning application is referred to Southern Water for comment. This will also allow us to assess the capacity of our wastewater and water network to serve the development.

The design of drainage should ensure that no groundwater or surface water flows are to enter a public foul or combined sewer, either through a direct discharge or through overland 'run off'.

### Policy Strategic Site Policy SD57: North Street Quarter, Former Bus Station and Adjacent Eastgate Area, Lewes

The current Local Plan has the following wording for this site allocation.

- l) It provides a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensures future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes;



We would like this wording retained as our assessment showed Southern Water wastewater and clean water infrastructure, of varying mains sizes, present within and around the development site.

This needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

### **Policy Allocation Policy SD58: Former Allotments, Alfriston**

Our initial assessments of this site ascertained that Southern Water's Foul Sewer Rising Main is located on the boundary of the site, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.

We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site.

*There is a strategic sewer rising main located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and upsizing is retained.*

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive. This is an important strategic asset.

### **Policy Allocation Policy SD63: Land South of the A272: at Hinton Marsh, Cheriton**

For your information, our assessment of this site indicated there is no public sewer network in close proximity to the site, the nearest public sewer catchment is 3.8 Kilometres away. This may need to be considered when designing the lay out of the development and assessing what new wastewater infrastructure is required to serve the development.

### **Policy Allocation Policy SD66: Cowdray Works Yard, Easebourne**

Our initial assessments of this site ascertained that Southern Water's Water Main is located on the boundary of the site in the carriageway, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.

We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site.

*There is a water main located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and upsizing is retained.*

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive. This is an important strategic asset.

### **Policy Allocation Policy SD71: Land at Petersfield Road, Greatham**

Southern Water is the statutory wastewater undertaker for the areas where this site is allocated. In accordance with this, we undertook an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for the proposed number of dwellings at site.

The assessment revealed that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.

Proposals for the number of dwellings at each site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development programme and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an **increased risk of flooding**, unless the requisite works are aligned with the occupation of the dwellings.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 187(e) of the revised National Planning Policy Framework (NPPF) (December 2024).

Therefore, we recommend the following Policy Requirement for Policy SD71.

*Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.*

Our assessments of this site also ascertained that Southern Water's Surface Water Sewer and Water Main are located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.

We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site.

*There is wastewater and waste infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and upsizing is retained.*

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.



### **Policy Allocation Policy SD72: Land at Fern Farm, Greatham**

Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.

Therefore, we recommend the following Policy Requirement for Policy SD72.

*Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and upsizing purposes.*

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

### **Policy Allocation Policy SD73: Land at Itchen Abbas House, Itchen Abbas**

For your information, our assessment of this site indicated that there is no public sewer network in close proximity to the site, the nearest public sewer catchment is 1.2 Kilometres away. This may need to be considered when designing the lay out of the development and assessing what new wastewater infrastructure is required to serve the development.

### **Policy Allocation Policy SD77: Malling Brooks, Lewes**

Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.

Therefore, we recommend the following Policy Requirement for Policy SD77.

*Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and upsizing purposes.*

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

## **Policy Strategic Allocation Policy SD79: Holmbush Caravan Park, Midhurst**

Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.

Therefore, we recommend the following Policy Requirement for Policy SD79.

*Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and upsizing purposes.*

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

## **Policy Allocation Policy SD80: Land at the Fairway, Midhurst**

Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.

Therefore, we recommend the following Policy Requirement for Policy SD80.

*Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and upsizing purposes.*

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

## **Policy Allocation Policy SD84: Land at Ketchers Field, Selborne**

For your information, our assessment of this site indicated that there is no public sewer network in close proximity to the site, the nearest public sewer catchment is 3.4 Kilometres away. This may need to be considered when designing the lay out of the development and assessing what new wastewater infrastructure is required to serve the development.

## **Policy Allocation Policy SD85: Land at Pulens Lane, Sheet**

Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.

We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site.



There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and upsizing is retained.

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

### **Policy Allocation Policy SD86: Land at Loppers Ash, South Harting**

Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.

We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site.

There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and upsizing is retained.

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

### **Policy Allocation Policy SD87: Land North of the Forge, South Harting**

Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.

We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site.

There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and upsizing is retained.

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

### **Policy Allocation Policy SD88: Stedham Sawmill, Stedham**

Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.

We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site.



There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and upsizing is retained.

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

### **Policy Allocation Policy SD91: Land South of Heather Close, West Ashling**

Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.

Therefore, we recommend the following Policy Requirement for Policy SD91.

Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and upsizing purposes.

This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.

## **Proposed New Allocations**

Southern Water will assess wastewater and water network capacity in relation to the number of dwellings proposed for any allocated development site during the planning process, any capacity constraints will be managed through the regulatory funding mechanism for the reinforcement of our network; currently that mechanism is the Infrastructure Charge paid by developers.

Whilst assessing capacity during the planning application process, should it be determined that the wastewater or water provisions for the development will cause detriment to the operation of the network, we will progress the necessary reinforcement work through our capital delivery programme. The local plan review has stated the following -

**5.2** *The sites identified as potential allocations in this section are those that met the Land Availability Assessment criteria of suitability, availability and achievability and were further assessed through the Integrated Impact Assessment and the Site Selection Paper ([www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/regulatory-assessments/integrated-impact-assessment-iaa-and-scoping-report/](http://www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/regulatory-assessments/integrated-impact-assessment-iaa-and-scoping-report/) and [www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/homes-and-economy/site-selection-major-development/](http://www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/homes-and-economy/site-selection-major-development/)). **However, they are still very much provisional allocations and further work will need to be undertaken before they can be included within the final Plan.***

As such, we have not undertaken any capacity checks of our networks in relation to the proposals in the Proposed New Allocations section at this stage.



However, we would welcome early engagement from South Downs National Park Authority once there is more certainty in regard to the allocations of sites and the number of dwellings.

This will allow us to determine whether new infrastructure or upgrades to existing infrastructure will be required to serve a development.

We support the inclusion of the following policy requirements for those sites, where they are applicable.

*The site is within the Sussex North Water Resource Zone. Appropriate mitigation measures to ensure development is water neutral will be provided as required (Policy SD10 refers).*

*The site is within the Solent Nutrient Neutrality Catchment Area that drain towards the Solent Special Protection Area, Special Area of Conservation (SAC) and Ramsar designated sites; and the River Itchen Nutrient Neutrality Catchment Area that drains towards the River Itchen SAC. Appropriate mitigation measures will be provided as required (Policy SD10 refers).*

*Development within Groundwater Source Protection Zones (SPZs) will only be permitted provided it can be demonstrated that there will not be foreseeable adverse impact on the quality of the groundwater source and provided there is no risk to its ability to maintain a water supply or contribute to nature conservation.*

17<sup>th</sup> March 2025



Our Reference: SEW Response\_SDNPALP\_17/03/25  
Your Reference: South Downs Local Plan Review

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Dear Sir/Madam,

Proposal: **South Downs Local Plan Review**

South East Water would like to thank South Downs National Park Authority for bringing the South Downs Local Plan Review consultation to our attention.

#### Water Resources Planning

Each water company is legally required to prepare a Water Resources Management Plan (WRMP) every five years. South East Water published our WRMP24 in October 2024. This plan sets out how we intend to maintain the balance between increasing demand for water and available supplies over the next 50 years up to 2075. The plan takes into account planned housing growth as well as measures to ensure environmental protection and improvement, and the potential impact of climate change. It also includes our ambitious water efficiency and leakage reduction programmes. For more information please visit our website:

<https://www.southeastwater.co.uk/about/our-plans/future-water/>

In South East Water's most recent business plan, 2025-2030 we have committed to play an active role regionally in relation to the impact of housing growth on water. We will develop a policy together with local stakeholders – appreciating the balance of supplying water, the need for society to ensure environmentally sustainable future water resources, and also the ongoing support of the south east region and its economic development. South East Water aims to respond to 100 per cent of all national, local and regional authority consultations and seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply infrastructure. Please see our latest business plan:

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<https://www.southeastwater.co.uk/about/our-plans/business-plan-2025-2030/>

We are also committed partners in the Water Resources in the South East (WRSE) Group that works for the collective good of customers and the environment in the south east region and also within the wider National Framework for long-term water resources planning.

### Growth Forecasting

As part of the development of our Water Resources Management Plan 2024 we worked in collaboration with Edge Analytics, a specialist demographic forecasting consultancy, to develop property and population forecasts at a water resource zone level. Edge Analytics maintains a comprehensive geographical database of detailed data from all local plans produced by local authorities across the UK.

Our recently published WRMP considers the housing trajectory figures from the South Downs available at the time we developed our plan meaning that we are confident that our plans accommodate a level of growth received from the Council in 2023. In regards to policy SD26: Supply of Homes and the updated NPF figures published in December 2024 by the Government we would be happy to receive any updated site allocation information including forecasted dwellings to ensure that our plans remain aligned and sufficient water is available within the local area to meet a supply-demand balance. The interventions we will deliver to meet this balance are a mix of new water supplies and demand management initiatives.

As applications are made through our developer enquiry process, we will work with local authorities and developers to carry out the appropriate detailed network modelling assessments, to ensure that any necessary infrastructure reinforcement is delivered (to move water to where is needed at a development level) ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. We are therefore committed and willing to ensure engagement and communication at the earliest opportunity.

### New Water Supplies and Infrastructure Development

As part of future development within our supply area, although there are no major schemes planned directly within the South Downs, our recent Business Plan aims to deliver new schemes in the neighbouring areas that will support existing and new development within SDNP.

In addition, we will be implementing new solutions to enhance our interconnectivity within the area as well as making sure that our water quality levels are maintained at the highest possible level to address current challenges around nitrate and turbidity.

There will also be a need to carry out work at a localised level based on growth and new developments once known within the area.

### Demand Management

Our aim of reducing household consumption to reach our per capita consumption ambition of 110 litres per person per day by 2050 requires the use of new approaches and technology, including smart metering. The savings are stretching and will be challenging to deliver especially given the impacts that affluence, temperature and rainfall have on our regional water use.

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It is recognised that, if we work in isolation, it is unlikely we will be able to achieve the levels of per capita consumption included in our forecast. Our ambitious water efficiency strategy, alongside the water labelling of all water using products (already committed to by the government), will achieve the forecast per capita consumption reductions required in the shorter term. Longer term we have made assumptions that wider initiatives will drive water efficiency, and examples include mandated water labelling (with minimum standards), stricter mandated building codes, design and regulations as well as national water efficiency messaging, policies and targets.

South East Water strongly supports any commitment to sustainable design of new residential and commercial development. South East Water recommends the need for mandatory housing standards for water use which would support water efficiency in new buildings and promote collaboration between councils and developers. Sustainable design standards for all residential and non-residential developments, including water use standards, should be a focus for developers as well as a monitoring responsibility for councils.

We strongly support policy SD48: Climate Change and Sustainable Use of Resources. As the South East is an area of serious water stress, it's therefore appropriate to apply as a minimum the optional building regulations standard of 110 litres per person per day for new development as a minimum water efficiency standard although we welcome the ambitious target set by the South Downs National Park Authority within policy SD48 for new developments where a target water efficiency rate of 90 litres or less per person per day will be required. The non-residential development requirement to achieve 70% of available BREEAM water credits is another example that we strongly recommend the implementation of this policy. We suggest that proposals should demonstrate how the design will be achieved using the methodology set out in the Building Regulations, with the design performance presented as part of the Sustainability Statement.

Based on this, South East Water is keen to discuss any future collaborations with the National Park Authority in any potential water efficiency initiatives or proof of concept trials etc that can benefit customers within the area.

#### Source Protection

With regards to policies SD17: Protection of the Water Environment and SD49: Flood Risk Management, South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring that the surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators. We would like to take this opportunity to highlight why it is important, to safeguard water supplies, to consider the impact of development on SPZs when determining planning applications in your local area.

South East Water operates in an area of the South East of England classified as seriously water stressed by the Environment Agency, and over 70 per cent of the water we supply comes from groundwater sources (over 250 boreholes and wells). Groundwater also keeps many of our rivers flowing and helps maintain good water quality in these rivers. Contamination of groundwater sources can be very difficult and time consuming to clean up. It is, therefore, incredibly important that we all work together to ensure that groundwater sources are protected. We have very little spare water (supply-demand headroom) to manage situations where sources must be removed from supply due to unplanned

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contamination events, and it can take at least 10-15 years to develop an alternative source at a significant cost to our customers.

SPZs are designated by the Environment Agency (EA) to protect public and private groundwater abstractions used for potable water supply. They are designed to control and restrict activities in the area immediately around points of abstraction that could cause contamination to groundwater used for human consumption. One of the principal reasons the EA define SPZs is to influence planning decisions and to promote pollution prevention through environmental permits, where required.

SPZs are defined in four different zones based upon how long it would take for a pollutant to travel in water below ground (any point below the water table) to the source (the point where water is taken), with SPZ1 representing the area closest to our abstraction. Controls are placed on activities in SPZs and examples of these include, but are not restricted to:

- Septic tanks and soakaways are not allowed to discharge into SPZ1 due to the risk of contamination and can also often be rejected by the EA in SPZ2 and SPZ3. See General Binding Rules - <https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-the-ground>
- Sustainable drainage systems (SuDS) for example in new developments. Where infiltration SuDS are proposed for anything other than clean roof drainage in SPZ1, a hydrogeological risk assessment is required, to ensure that the system does not pose an unacceptable risk to the source of supply.
- Land use changes, for example, livestock housing and storage of organic manures within SPZ1 or within 50 metres of any borehole, well or spring is prohibited.

SPZs were originally included in statutory guidance as the minimum area under the Groundwater Directive (80/68/EEC) that is identified for the protection of drinking water. This directive has since been subsumed into the Water Framework Directive. They are also recognised as an exclusion zone for some potentially polluting activities listed in the Environmental Permitting Regulations.

The Government's Planning Practice Guidance references the need to steer potentially polluting development away from the most sensitive areas, particularly those in the vicinity of drinking water supplies (paragraph: 006 Reference ID: 34-006-20161116).

Regrettably, water companies like South East Water, are not statutory consultees for planning. However, we would like to work with local authorities, as well as the EA, to ensure that SPZs are routinely considered in planning decisions to safeguard water supplies in your local area. We also encourage you to consider the risks to groundwater from activities which might pose a risk such as the redevelopment of brownfield sites with an industrial legacy and wastewater treatment solutions that incorporate reed beds or soakaways as part of the treatment process.

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South East Water would like to be kept updated with any developments relating to the South Downs Local Plan, using the following mailbox: [planning@southeastwater.co.uk](mailto:planning@southeastwater.co.uk). We look forward to working with South Downs National Park Authority to ensure that drinking water supplies remain protected in the area in the future and welcome the opportunity to collaborate to achieve the objectives in a sustainable way.

If you require any further information or have any questions about this letter, please do not hesitate to contact me via the above email address.

Yours sincerely,

**Pedro Santos**  
**South East Water**

**Information on SPZs can be found here:**

- Source Protection Zones in your area can be found online:  
<https://magic.defra.gov.uk/MagicMap.aspx>
- Information on SPZs can also be found on the government website:  
<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>
- Environment Agency Technical Guidance -  
<https://assets.publishing.service.gov.uk/media/5d41a020e5274a0a0bf7757c/Manual-for-the-production-of-Groundwater-Source-Protection-Zones.pdf>
- Environment Agency position statements (including information on restricted activities)  
<https://www.gov.uk/government/publications/groundwater-protection-position-statements>
- Environmental Protection Act 1990:Part 2A, Contaminated Land Statutory Guidance -  
<https://assets.publishing.service.gov.uk/media/5a757dfa40f0b6360e47489d/pb13735/cont-land-guidance.pdf>

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**CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING  
(DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2010**

**Planning Application Reference:** South Downs National Park Local Plan Review: Have Your Say Now (Reg 18 Public Consultation)

**Location:** South Downs Local Park (SDNP)

**Date:** 13 March 2025

Thank you for consulting Portsmouth Water we have reviewed the relevant documentation and have the following comments.

## **Introduction**

Portsmouth Water is a water only company, that operates 21 sources of supply, all of the abstractions being from Chalk-based sources:

- Havant & Bedhampton Springs (27%)
- Groundwater Sources (62%)
- River Itchen (11%)

On average, Portsmouth Water supplies around 175 million litres of water each day (175Ml/d) to over 740,000 customers in around 320,000 properties. As an industry and in the South East region we are facing the increasing challenges of climate change, population growth and the pressing need to support our natural environment together. In 2021 our area was reclassified as 'seriously water stressed' by the Environment Agency. We are aiming to reduce water use across our catchment but we do also need new, reliable sources of water to meet the pressures from climate change, population growth and in order to leave more water in the environment - particularly to protect the rare chalk streams in Hampshire and West Sussex. Our Water Resources Management Plan sets out the steps we'll take to achieve this between 2025 and 2075, in order to protect the environment, support our communities and allow the local economy to thrive.

For more detail on Portsmouth's Resource Management Plan (RMP) please follow the link below:

<https://www.portsmouthwater.co.uk/news/publications/water-resources-planning/>

Below are Portsmouth Water's comments to relevant sections of the Local Plan consultation that Portsmouth Water wish to comment on.

### **Vision and Objectives**

Agree. Portsmouth Water support the Vision and Objectives.

### **Core Policies**

Agree. Portsmouth Water support the core policies.

### **Policy SD1: Sustainable Development**

Agree. Portsmouth Water support this policy.

### **Policy SD2: Ecosystem Services**

Strongly Agree. Portsmouth Water support this policy.

### **Policy SD25: Development Strategy**

Agree. Portsmouth Water support this policy.

### **Landscape and Heritage**

#### **Policy SD5: Design**

In rural/semi-rural areas of our Portsmouth Water groundwater Source Protection Zones (SPZs) Domestic Heated Oil Tanks (DHOs) are the main source of energy for many households, farms and businesses and even entire communities.

DHOs present the highest significant risk to groundwater quality from point source pollution events e.g tank failure, unsuitable maintenance or theft.

If the proposed source of energy for any new development within a Source Protection Zone (SPZ) are Domestic Heated Oil Tanks (DHOs) this will **increase** the risk to groundwater quality.

Oil and fuel tanks pose a significant risk to groundwater quality if they are not constructed or maintained in accordance with best practice and the manufacturers' guidance. Construction should be in accordance with Building Regulations and OFTEC guidance.

Portsmouth Water would like to recommend conditions on any planning permission to review the installation of fuel and oil tanks within the SDNP plan area.

Portsmouth Water would support alternative and more sustainable sources of energy such as Air Source Heat Pumps.

### **Policy SD15: Conservation Areas**

Agree. Portsmouth Water support this policy.

### **Policy SD16: Archaeology**

Portsmouth Water, as part of its Catchment Strategy, supports farming schemes and measures that reduce pesticides and nitrate fertilisers so as to protect and improve water quality. Some of these schemes, such as herbal leys promote these objectives. However, Archaeology rules within SDNP area is preventing the uptake of these measures. In consequence, farmers will utilise traditional farming practices that use intensive such as using higher rates of pesticides and fertilisers. We wish to seek amendments to these restrictions and want to work with SDNP and other local authorities to relax the rules for more sustainable and environmentally friendly practices.

### **Nature Recovery**

Strongly Agree. Portsmouth Water support this policy.

### **Policy SD10: International Sites**

Strongly Agree. Portsmouth Water support this policy.

### **Strategic Policy NEW 4: Arun Valley SPA/sac/Ramsar – Water Neutrality**

Strongly Agree. Portsmouth Water support this policy.

## **Strategic Policy NEW7: Solent Coast SPAs and SACs and the River Itchen SAC – Nutrient Neutrality**

Strongly Agree. Portsmouth Water support this policy.

## **Policy SD11: Trees, Woodlands, and Hedgerows**

Strongly Agree. Portsmouth Water support this policy.

## **Climate Action**

### **Policy SD48: Climate Change and Sustainable Use of Resources**

Agree. Portsmouth Water support this policy.

### **Strategic Policy SD48: Climate Change and Sustainable Use of Resources**

Agree. Portsmouth Water support this policy.

***1.c.i) Fossil fuels should be avoided for operational energy and measures such as battery storage used where practical to reduce the burden on the National Grid;***

**Portsmouth Water support the above statement.**

#### **Further commentary**

The location of Battery Energy Storage systems (BESS) within the SDNP Local Plan Area will need to be considered carefully at the early stages of any potential proposal.

Portsmouth Water would discourage any large-scale Battery Energy Storage systems (BESS) if located within any Source Protection Zone (SPZ).

A fire incident associated with a Battery Energy Storage system (BESS) poses a risk to groundwater and surface water. The main risk from such an event is the tactical response used to control or contain the fire by the Fire and Rescue Service. Thermal runaway would require the use of high volumes of water to control. Whilst the likelihood of a fire at the battery storage site is low, given the low number of thermal runaway incidents at BESS sites in the UK to date.

If such a fire were to occur, and high volumes of water are required to control or contain it the consequences could be very significant. There would be high potential for contamination of groundwater and the underlying aquifer due to the karstic nature of the Chalk, especially in areas where solution features may be present.

Further to this, as large-scale BESS are a relatively recent development, it is unclear how/if the likelihood of a thermal runaway event increases with the age of the battery installation.

Portsmouth Water recommend that environmental risks such as those detailed above are considered early on in Environmental Impact Assessments and Screening and Scoping Opinions for any large-scale BESS proposals.

Any proposals for large-scale battery energy storage systems (BESS) should be in consultation with Fire and Rescue Service, at the earliest opportunity.

Portsmouth Water wish to be consulted along with the Fire and Rescue Service on any associated EIA and Screening and Scoping Opinions for any large-scale BESS proposals.

***3. a) Residential and visitor accommodation: predicted mains water consumption  $\leq$  90 litres/person/day***

Whilst not in our supply area, we support the higher water efficiency standards applicable to the Sussex North Water Neutrality Zone.

Portsmouth Water encourage local planning authorities to consider higher standards of water efficiency in new developments, with all new homes being built to a minimum standard of 100 litres per person per day. Planning policy can help to ensure long-term sustainability and management of water supplies, which is likely to reduce the need to take less water from the environment to protect local streams and rivers and the wildlife which rely on them.

For developments that can demonstrate meeting high standards of water efficiency of no more than 100 litres per head per day, Portsmouth water offer an incentive of a 50% discount on the Infrastructure charge. Based on a development of 200 properties with an occupancy of 3 people per property, there will be a minimum saving of 15,000 litres per day. The guide would benefit covering the importance of water efficient developments and to recommend this for all new dwellings'

***5. For all development proposals which involve the change of use or redevelopment of a building, or an extension to an existing building, the applicant is encouraged to consider all opportunities to improve the energy efficiency, overall carbon emissions, water consumption and embodied carbon across the planning unit.***

Portsmouth Water support the above statement.

## **Policy SD51: Renewable Energy**

Agree. Portsmouth Water supports this policy.

### **Further commentary**

- 1. Development proposals for renewable energy schemes, including small-scale solar arrays and wind turbines (up to 1MW), battery energy storage systems (BESS), biomass boilers, solar panels, hydropower and heat pumps***

The location of Battery Energy Storage systems (BESS) within the SDNP Local Plan Area will need to be considered carefully at the early stages of any potential proposal.

Portsmouth Water would discourage any large-scale Battery Energy Storage systems (BESS) if located within any Source Protection Zone (SPZ).

A fire incident associated with a Battery Energy Storage system (BESS) poses a risk to groundwater and surface water. The main risk from such an event is the tactical response used to control or contain the fire by the Fire and Rescue Service. Thermal runaway would require the use of high volumes of water to control. Whilst the likelihood of a fire at the battery storage site is low, given the low number of thermal runaway incidents at BESS sites in the UK to date.

If such a fire were to occur, and high volumes of water are required to control or contain it the consequences could be very significant. There would be high potential for contamination of groundwater and the underlying aquifer due to the karstic nature of the Chalk, especially in areas where solution features may be present.

Further to this, as large-scale BESS are a relatively recent development, it is unclear how/if the likelihood of a thermal runaway event increases with the age of the battery installation.

Portsmouth Water recommend that environmental risks such as those detailed above are considered early on in Environmental Impact Assessments and Screening and Scoping Opinions for any large-scale BESS proposals.

Any proposals for large-scale battery energy storage systems (BESS) should be in consultation with Fire and Rescue Service, at the earliest opportunity.

Portsmouth Water wish to be consulted along with the Fire and Rescue Service on any associated EIA and Screening and Scoping Opinions for any large-scale BESS proposals.

***3. Support will be given to renewable and low carbon energy generation developments that are led by, or meet the needs of local communities. The positive benefits of community energy schemes will be an important material consideration in assessing renewable energy development proposals. The preference is for schemes that are in line with the hierarchy and project attributes below:***

In rural/semi-rural areas of our Portsmouth Water groundwater Source Protection Zones (SPZs) Domestic Heated Oil Tanks (DHOs) are the main source of energy for many households, farms and businesses and even entire communities.

Domestic Heated Oil Tanks (DHOs) present the highest significant risk to groundwater quality from point source pollution events e.g tank failure, unsuitable maintenance or theft.

If the proposed source of energy for any development within a Source Protection Zone (SPZ) are Domestic Heated Oil Tanks (DHOs) this will **increase** the risk to groundwater quality.

Oil and fuel tanks pose a significant risk to groundwater quality if they are not constructed or maintained in accordance with best practice and the manufacturers' guidance. Construction should be in accordance with Building Regulations and OFTEC guidance.

Portsmouth Water would like to recommend conditions on any planning permission to review the installation of fuel and oil tanks within the SDNP plan area.

Portsmouth Water would support alternative and more sustainable sources of energy such as Air Source Heat Pumps.

## **Water and Pollution**

### **Policy SD17: Protection of the Water Environment**

Portsmouth Water disagrees with the following statement and recommends improvements.

***3. Small scale wastewater treatment infrastructure serving on site uses should not be located within identifiable connectivity pathways of surface waters.***

It is unclear what this policy means. For discharges to groundwater, please find our comments below:

#### **Pollution from non-mains sewerage**

Where possible all new developments should connect to the main sewerage network. Non-mains sewerage presents a risk to groundwater quality, particularly with regard to Nitrate levels. Nitrate levels within groundwater across Portsmouth Water abstraction sites are of rising trends over the long term.

If connection to the main sewerage network or if “first time sewerage” connection to the mains is not possible, the following should be considered at the early design stages and along with any subsequent outline planning application.

#### **Discharge Permits:**

An application for a Discharge Permit will need to be requested through the Environment Agency (EA). Issue of Discharge Permits from the EA are **not** guaranteed, therefore permit applications should, ideally, be submitted in parallel to any planning application. Any proposed sewerage treatment plant must comply with the General Binding Rules and should be compliant with a British Standard System (Additional information on discharges from sewerage treatment plants can be seen below).

#### **General Binding Rules:**

Waste water discharges to ground via Septic tanks, sewage treatment plants and other systems are also subject to General Binding rules, more information can be found on these requirements can be found via the link below:

#### **Discharges to ground:**

**Note:** There are some new legislative amendments within the below guidance. Rule 22 covers discharges from new developments which are subdivided to meet GBR volumetric limits but use the same outlet.

<https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-the-ground>

### **Discharges to surface water:**

Rule 19 requirement to meet the General Binding Rules is particularly important within the SDNP Local Plan area as Chalk groundwater fed streams and rivers naturally dry up seasonally.

#### **Rule 19:**

***“Make sure the surface water has flow.”***

**“You cannot meet the general binding rules if you have a discharge to:”**

- **“a ditch or a surface water that does not contain flowing water throughout the year, unless there is a drought or an unusually long period of dry weather”**
- **“watercourses that seasonally dry up”**

<https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water>

### **Further commentary**

Portsmouth Water recommend that new developments not only consider the treatment of foul water, but also the means of disposal. Discharge from any non-mains sewerage system contains Nitrate. If proposals for a new development or change of use are to discharge to ground, the development plans should include adequate space for a percolation area. This should be incorporated into the design and be included on the site plans at the early stages.

Similarly, if nature-based solutions, such as reedbeds form part of the foul water drainage designs there must be assurance that they are of an adequate size e.g have large enough treatment capacity.

Detailed foul water drainage designs and specifications are required to be submitted to the Local Planning Authority (LPA) for review in consultation with the Environment Agency and Portsmouth Water.

***4. Development proposals should identify and incorporate opportunities to support the delivery of the relevant Catchment Management Plan and Local Nature Recovery Strategy.***

It should be noted that some of the Catchment Partnerships may not have relevant Catchment Plans or full details that seek protection of groundwater and surface water. In addition to this, the Water Companies Catchment Management Plans and groundwater/surface water protection plans also need to be considered. We recommend that “The Environment Agency approach to groundwater protection” also need to be taken in to consideration for development proposals.

This is a key document and provides position statements which Portsmouth Water supports to managing and protecting groundwater.

*5. Development proposals must provide adequate protection zones and buffers to watercourses. It must be demonstrated that the buffer is suitable to retain the natural function of the watercourse and its biodiversity and minimise direct and indirect impacts to the watercourse.*

Whilst we support this statement, there is no guidance on how this needs to be designed, developed and put into practice during development proposals. We would be happy to be consulted on this further.

*6. Development within Groundwater Source Protection Zones (SPZs) will only be permitted provided it can be demonstrated that there will not be no foreseeable adverse impact on the quality of the groundwater source and provided there is no risk to its ability to maintain a water supply or contribute to nature conservation.*

Whilst we support this statement. what guidance, assessments and modelling is required to “..demonstrate that there will be no foreseeable adverse impacts on the quality of the groundwater source...”. We would be happy to be consulted on this further.

## **Policy SD49: Flood Risk Management**

Strongly Agree. Portsmouth Water supports this policy.

## **Policy SD50: Sustainable Drainage Systems**

Strongly Agree. Portsmouth Water supports the above Policy.

## **Policy SD54: Pollution and Air Quality**

Agree. Not much information on water pollution, further commentary would be beneficial for the protection of the water environment.

## **Policy SD55: Contaminated Land**

*1. Development proposals for sites with either known or suspected contamination or the potential to contaminate land either on site or in the vicinity, will require the submission of robust evidence regarding investigations and remedial measures sufficient to ensure that any unacceptable risk to human health or the health of the environment is removed prior to development proceeding.*

Whilst we support this statement, we recommend that the following statement is changed from “... unacceptable risk to human health or the health of the environment...” to “...unacceptable

risk to human health, health of the environment, surface water, groundwater and coastal waters.". We would be happy to be consulted on this further.

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13 February 2025

## South Downs Local Plan Regulation 18 Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

Thames Water are the statutory sewerage undertaker for a small part of the northern area of the National Park and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation in relation to our sewerage undertakings.

### **General Wastewater [and Water] Infrastructure Comments**

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater [and water supply] treatment infrastructure.

Wastewater [and Water Supply] infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses [and/or low water pressure].

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), December 2024, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

Paragraph 11 states: “*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

*a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment;*

*mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*

Paragraph 29 relates to non-strategic policies and states: *“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”*

Paragraph 26 of the revised NPPF goes on to state: *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

*Paragraph 27 states: “Once the matters which require collaboration have been identified, strategic policy-making authorities should make sure that their plan policies align as fully as possible with those of other bodies where a strategic relationship exists on these matters, and take into account the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary. In particular their plans should ensure that:*

*a) a consistent approach is taken to planning the delivery of major infrastructure, such as major transport services/projects, utilities, waste, minerals.....”*

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and as from the 1st April 2018 network improvements are funded from infrastructure charges per new dwelling.

Thames Water and the other water companies, are funded in 5 year periods called Asset Management Plans (AMPs). We are currently in AMP7 (7th since privatisation) which runs from 1st April 2020 to 31st March 2025. Thames Water’s growth plans are based on planning information in the public domain and as such, Local Plans play an extremely important role in their growth assumption planning.

As part of Thames Water’s five year business plan they advise OFWAT on the funding required to accommodate growth at their treatment works. As a result Thames Water base their investment programmes on development plan allocations which form the clearest picture of the shape of the community as set out in the National Planning Policy Framework and the National Planning Practice Guidance.

The time to deliver solutions should not be underestimated. For example, local network upgrades take around 18 months and Treatment Works upgrades can take 3-5 years.

AMP8, currently being finalised with OFWAT, will cover the period 1st April 2025 to 31st March 2030. It may be necessary for new or upgraded water and waste water infrastructure to be provided in respect of individual developments, depending on the type, scale and location of development. It is crucial that any such additional infrastructure is provided in time to service development to avoid unacceptable impacts on the environment and this is the reason that Thames Water seeks adequate policy coverage and support for Water/Wastewater Infrastructure within Local Plans and related planning policy documents. Ofwat are due to issue the final Determination for AMP8 in late 2024/early 2025. Further details are available at:

<https://www.thameswater.co.uk/about-us/regulation/our-five-year-plan>

To assist the continued operation of the infrastructure network and to support growth within the area, Thames Water are anticipating undertaking a major upgrade at the Riverside Sewage Treatment Works during the AMP8 period. The new Local Plan should make supporting reference to this essential infrastructure.

As from 1st April 2018, network improvements are funded from infrastructure charges per dwelling. This funding process means that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Information on how off site network reinforcement is funded can be found here

<https://developers.thameswater.co.uk/New-connection-charging>

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of sewerage/wastewater [and water supply] infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy:

**PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:**

***“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”***

***“The Local Planning Authority will seek to ensure that there is adequate water and***

**wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”**

Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Hence, a further text should be added to Policy as follows:

**“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”**

### **Flood Risk & Sustainable Drainage Comments**

In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

### **Growth Options Comments**

The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table provides Thames Water’s site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,

David Wilson  
Thames Water Property Town Planner

## **B RAG Assessment**

Site information			Water Supply			Wastewater				Comments
Site Reference / Policy No. / PP Application No.	Type	Location / Site Address	Water Company	Water Supply Networks RAG	Water Supply Networks Comments	Company Treating Wastewater	Southern Water Wastewater RAG	Thames Water WWTW Flow Capacity RAG	Thames Water Foul Sewerage Network Capacity RAG	
SD56	Unimplemented existing allocations	Shoreham Cement Works	Southern Water	N/A	REG18 comments- The site is not connected to a Southern Water clean water mains or wastewater sewerage network. There is an existing private system of foul and surface water.	Southern Water	N/A	N/A	N/A	REG18 comments- The site is not connected to a Southern Water clean water mains or wastewater sewerage network. There is an existing private system of foul and surface water leaving including outfalls to the River Adur and two existing outfalls to the ground and surface water.
SD57	Unimplemented existing allocations	North Street Quarter	Southern Water		REG18 comments- The current Local Plan has the following wording for this site allocation. <i>If it provides a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensures future access to the existing sewerage and water supply infrastructure for maintenance and up sizing purposes ;</i>  We would like this wording retained as our assessment showed Southern Water wastewater and clean water infrastructure, of varying mains sizes, present within and around the development site.	Southern Water				REG18 comments- The current Local Plan has the following wording for this site allocation. <i>If it provides a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensures future access to the existing sewerage and water supply infrastructure for maintenance and up sizing purposes ;</i>  We would like this wording retained as our assessment showed Southern Water wastewater and clean water infrastructure, of varying mains sizes, present within and around the development site.
SD58	Unimplemented existing allocations	Former Allotments, Alfriston	Southern Water		N/A- No comments made on water supply in REG 18 comments.	Southern Water				REG18 comments- Our initial assessments of this site ascertained that Southern Water's Foul Sewer Rising Main is located on the boundary of the site, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.  We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site. <i>There is a strategic sewer rising main located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and up sizing is retained.</i>
SD59	Unimplemented existing allocations	Kings Ride, Alfriston	South East Water	N/A- No response	N/A	Southern Water				No comments made on site in REG 18 comments
SD60	Unimplemented existing allocations	Land at Clements Close, Binsted	South East Water	N/A- No response	N/A	Thames Water	N/A			N/A
SD61	Unimplemented existing allocations	New Barn Stables, The Street, Binsted	South East Water	N/A- No response	N/A	Thames Water	N/A	N/A	N/A	N/A
SD63	Unimplemented existing allocations	Land South of the A272 at Hinton Marsh, Chertiton	Southern Water		N/A- No comments made on water supply in REG 18 comments.	Southern Water				REG18 comments-For your information, our assessment of this site indicated there is no public sewer network in close proximity to the site, the nearest public sewer catchment is 3.8 kilometres away. This may need to be considered when designing the layout of the development and assessing what new wastewater infrastructure is required to serve the development.
SD64	Unimplemented existing allocations	Land South of London Road, Coldwaltham	Southern Water	N/A	No comments made on site in REG 18 comments	Southern Water				No comments made on site in REG 18 comments
SD65	Unimplemented existing allocations	Land at Park Lane, Droxford	Portsmouth Water		N/A	Southern Water				No comments made on site in REG 18 comments
SD66	Unimplemented existing allocations	Cowdray Estate Works Yard, Easebourne	Southern Water		REG18 comments- Our initial assessments of this site ascertained that Southern Water's Water Main is located on the boundary of the site in the carriage way, our mapping records are not always	Southern Water				N/A- No comments made on wastewater infrastructure in REG 18 comments.
SD69	Unimplemented existing allocations	Land to the east of Elm Rise, Findon	Southern Water		No comments made on site in REG 18 comments	Southern Water				No comments made on site in REG 18 comments
SD70	Unimplemented existing allocations	Soldiers Field House Findon	Southern Water		No comments made on site in REG 18 comments	Southern Water				No comments made on site in REG 18 comments
SD71	Unimplemented existing allocations	Land at Petersfield Road, Greatham (Liss Forest Nursery)	South East Water	N/A- No response received	N/A	Southern Water				REG18 comments- Southern Water is the statutory wastewater undertaker for the areas where this site is allocated. In accordance with this, we undertook an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for the proposed number of dwellings at site.  The assessment revealed that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.  Proposals for the number of dwellings at each site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development programme and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding, unless the requisite works are aligned with the occupation of the dwellings.  Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 187(e) of the revised National Planning Policy Framework (NPPF) (December 2024).  Therefore, we recommend the following Policy Requirement for Policy SD71. <i>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.</i>  Our assessments of this site also ascertained that Southern Water's Surface Water Sewer and Water Main are located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.  We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site. <i>There is wastewater and waste infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and up sizing is retained.</i>  This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.
SD72	Unimplemented existing allocations	Land at Fern Farm, Greatham	South East Water	N/A- No response received	N/A	Southern Water				REG18 comments-Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.  Therefore, we recommend the following Policy Requirement for Policy SD72. <i>Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and up sizing purposes.</i>  This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.
SD73	Unimplemented existing allocations	Land at Itchen Abbas House, Itchen Abbas	Southern Water		N/A- No comments made on water supply in REG 18 comments.	Southern Water				REG18 comments- For your information, our assessment of this site indicated that there is no public sewer network in close proximity to the site, the nearest public sewer catchment is 1.2 kilometres away. This may need to be considered when designing the layout of the development and assessing what new wastewater infrastructure is required to serve the development.
SD74	Unimplemented existing allocations	Castelmor Fruit Farm, Kingston near Lewes	Southern Water		No comments made on site in REG 18 comments	Southern Water				No comments made on site in REG 18 comments
SD76	Unimplemented existing allocations	Land at Old Malling Farm Lewes	Southern Water		No comments made on site in REG 18 comments	Southern Water				No comments made on site in REG 18 comments

Site information			Water Supply			Wastewater				Comments
Site Reference / Policy No. / PP Application No.	Type	Location / Site Address	Water Company	Water Supply Networks RAG	Water Supply Networks Comments	Company Treating Wastewater	Southern Water Wastewater RAG	Thames Water WwTW Flow Capacity RAG	Thames Water Foul Sewerage Network Capacity RAG	
SD77	Unimplemented existing allocations	Maiting Brooks, Lewes	Southern Water		<p>REG18 comments- Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Therefore, we recommend the following Policy Requirement for Policy SD77. <i>Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and up sizing purposes.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>	Southern Water				<p>REG18 comments- Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Therefore, we recommend the following Policy Requirement for Policy SD77. <i>Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and up sizing purposes.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>
SD79	Unimplemented existing allocations	Holmbush Caravan Park, Midhurst	Southern Water		<p>REG18 comments- Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Therefore, we recommend the following Policy Requirement for Policy SD79. <i>Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and up sizing purposes.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>	Southern Water				<p>REG18 comments-Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Therefore, we recommend the following Policy Requirement for Policy SD79. <i>Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and up sizing purposes.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>
SD80	Unimplemented existing allocations	Land at the Fairway, Midhurst	Southern Water		<p>REG18 comments- Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Therefore, we recommend the following Policy Requirement for Policy SD80. <i>Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and up sizing purposes.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>	Southern Water				<p>REG18 comments- Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Therefore, we recommend the following Policy Requirement for Policy SD80. <i>Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and up sizing purposes.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>
SD83	Unimplemented existing allocations	Offham Barns, Offham	South East Water	N/A- No response	N/A	Southern Water				No comments made on site in REG 18 comments
SD84	Unimplemented existing allocations	Land to the rear of Ketchers Field, Selborne	South East Water	N/A- No response	N/A	Southern Water				REG18 comments-For your information, our assessment of this site indicated that there is no public sewer network in close proximity to the site, the nearest public sewer catchment is 2.4 kilometres away. This may need to be considered when designing the layout of the development, and assessing what new wastewater infrastructure is required to serve the
SD85	Unimplemented existing allocations	Land at Pulens Lane, Sheet	South East Water	N/A- No response	N/A	Southern Water				REG18 comments-Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.
SD86	Unimplemented existing allocations	Land at Loppers Ash, South Harting	Southern Water		<p>REG18 comments- Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.</p> <p>We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site. <i>There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and up sizing is retained.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>	Southern Water				<p>REG18 comments- Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.</p> <p>We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site. <i>There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and up sizing is retained.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>
SD87	Unimplemented existing allocations	Land North of the Forge, South Harting	Southern Water		<p>REG18 comments- Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.</p> <p>We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site. <i>There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and up sizing is retained.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>	Southern Water				<p>REG18 comments- Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.</p> <p>We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site. <i>There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and up sizing is retained.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>
SD88	Unimplemented existing allocations	Stedham Sawmill, Stedham	Southern Water		<p>REG18 comments- Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.</p> <p>We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site. <i>There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and up sizing is retained.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>	Southern Water				<p>REG18 comments- Our assessments of this site also ascertained that Southern Water's infrastructure is located on the border of the development, our mapping records are not always accurate so this may need to be taken into account when designing the layout of any proposed development.</p> <p>We would recommend the following Policy Requirement where Southern Water infrastructure is located near the boundary of a site. <i>There is wastewater infrastructure located near the site boundary. It is important that the exact location of this infrastructure in relation to the site is established prior to the commencement of any construction, in liaison with Southern Water, and that suitable access for maintenance and up sizing is retained.</i></p> <p>This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.</p>

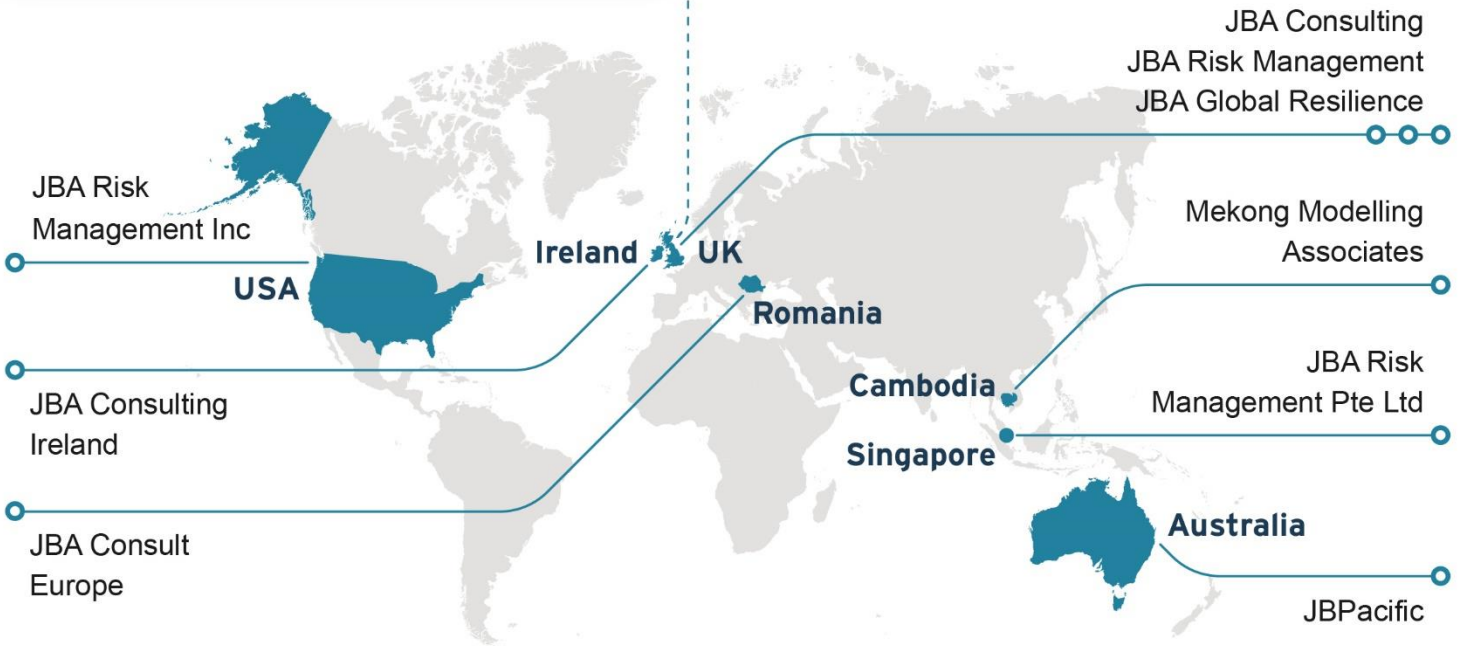
Site information			Water Supply			Wastewater				Comments
Site Reference / Policy No. / PP Application No.	Type	Location / Site Address	Water Company	Water Supply Networks RAG	Water Supply Networks Comments	Company Treating Wastewater	Southern Water Wastewater RAG	Thames Water WwTW Flow Capacity RAG	Thames Water Foul Sewerage Network Capacity RAG	
SD89	Unimplemented existing allocations	Land South of Church Road, Steep	Southern Water	N/A- No response received	N/A	Southern Water				Our assessment of this site ascertained that Southern Water's infrastructure is located within the site, which needs to be taken into account when designing the layout of any proposed development. An assessment with 10 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This assessment should be clear of all proposed buildings and substantial tree planting.  Therefore, we recommend the following Policy Requirement for Policy SD91. <i>Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and upsking purposes.</i>  This policy requirement is important as we will not allow development to be built over Southern Water assets and the costs of diverting the assets can be prohibitive.
SD91	Unimplemented existing allocations	Land South of Heather Close West Ashing	Portsmouth Water		N/A	Southern Water				No comments made on site in REG 18 comments
EA215	Proposed New Allocations	Land west of Liphook / Land at Westlands Park	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Thames Water	N/A			N/A
LE039	Proposed New Allocations	County Hall, St Anne's Crescent	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A			No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE141	Proposed New Allocations	East Sussex College, Mountfield Road	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
WED14	Proposed New Allocations	Athlston Court	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
HD07-038	Proposed New Allocations	East Street Farm	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA161	Proposed New Allocations	Land south of Lovell Gardens	Southern Water	N/A- No response	N/A	Thames Water				N/A
EA205	Proposed New Allocations	Land at Greenways Lane and Klin Lane	Southern Water	N/A- No response	N/A	Southern Water	N/A			No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH003	Proposed New Allocations	Land East of Coombe Crescent	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH199	Proposed New Allocations	Land east of A286 and north of Mill Lane,	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE090	Proposed New Allocations	Land at Beechwood Lane,	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE148	Proposed New Allocations	Land rear 71 East End Lane	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH147	Proposed New Allocations	Midhurst Community Hospital and 1-2 Rotherfield Mews	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH203	Proposed New Allocations	Land at former Easebourne School, Easebourne	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH206	Proposed New Allocations	Land west of Budgen Lodge, Easebourne	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH026	Proposed New Allocations	Land at Hawksfold, Ferrimurst	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
AR009	Proposed New Allocations	Former Allotments north of The Quadrangle, Findon	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
MI014	Proposed New Allocations	Land east of Lodge Lane, Keymer, Hassocks	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE118	Proposed New Allocations	Land at Beaumont, Welgreen Lane, Kingston	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE124	Proposed New Allocations	Audburn Farm, Ashcombe Lane, Kingston	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE103	Proposed New Allocations	Land behind the White Hart, 55, High Street, Lewes	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE114	Proposed New Allocations	Land at the rear of 49-55, St Anne's Crescent, Lewes	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE133	Proposed New Allocations	Springman House, 8 North Street, Lewes	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE134	Proposed New Allocations	The Shelleys Hotel, 136, High Street, Lewes	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA216	Proposed New Allocations	Land at Westlands, Liphook	Southern Water	N/A- No response	N/A	Thames Water	N/A			N/A
CH215	Proposed New Allocations	Land West of The Street, Lodsworth	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A			No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH165	Proposed New Allocations	Land east of Pitsham Lane, Midhurst	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH217	Proposed New Allocations	Land at Forest Road, Midhurst	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH218	Proposed New Allocations	Former Bus Depot, Pitsham Lane, Midhurst	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH222	Proposed New Allocations	Land adjacent to The Grange Car Park, Midhurst	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH074	Proposed New Allocations	Land west of Valentines Lea, Northchapel	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
W100	Proposed New Allocations	Land at Old Green Farm	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
W101	Proposed New Allocations	Land at Whites Hill Farm, Owslebury	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA067	Proposed New Allocations	Land at Penns Place, Petersfield	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA071	Proposed New Allocations	Land south of Paddock Way	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA225	Proposed New Allocations	Land at Festival Hall	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA182	Proposed New Allocations	Land at Drum Court, The Spain	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA187	Proposed New Allocations	Land at Windward, Reservoir Lane, Petersfield	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA195	Proposed New Allocations	The Courtyard, Heath Road, Petersfield	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH092/CH093	Proposed New Allocations	Land at Rotherbridge Lane, Petworth	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH096	Proposed New Allocations	Land north of Northend Close, Petworth	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
CH236	Proposed New Allocations	Land west of Village Hall, Rogate	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA109	Proposed New Allocations	Land at Seaford Golf Club, Fite Road, Seaford	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
LE200	Proposed New Allocations	Land off Merryfield Road, Sheet	Southern Water	N/A- No response	N/A	Southern Water	N/A	N/A		No comments made on site in REG 18 comments. Please see main report for Southern Water's response.

Site information			Water Supply			Wastewater				Comments
Site Reference / Policy No. / PP Application No.	Type	Location / Site Address	Water Company	Water Supply Networks RAG	Water Supply Networks Comments	Company Treating Wastewater	Southern Water Wastewater RAG	Thames Water WWTW Flow Capacity RAG	Thames Water Foul Sewerage Network Capacity RAG	
AD001	Proposed New Allocations	Land off Steepdown Road, Sompting	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA212	Proposed New Allocations	Land north of Winchester Road, Stroud	South East Water	N/A- No response	N/A	Southern Water	N/A	N/A	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
W102	Proposed New Allocations	Land north of Dodds Lane, Swanmore	Portsmouth Water		N/A	Southern Water	N/A	N/A	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
W056	Proposed New Allocations	Land north of Hewlett Close, Teyford	Southern Water	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.	Southern Water	N/A	N/A	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.
EA043	Proposed New Allocations	Land at Farnham & Station Roads	South East Water	N/A- No response	N/A	Southern Water	N/A	N/A	N/A	No comments made on site in REG 18 comments. Please see main report for Southern Water's response.



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