



The Parish Clerk
Bramber Parish Council

Your Ref:

By Email Only

Our Ref:

Date:
30 October 2019

Contact:
Tel: 01273 663742

Dear Sir/Madam,

Bramber Pre Submission Neighbourhood Plan

Thank you for consulting Southern Water on the Pre-Submission version of the Bramber Neighbourhood Plan.

Southern Water is the statutory water and wastewater undertaker for the area covered by Bramber Parish Council. As such, please find attached our comments in respect of the Neighbourhood Plan.

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

Yours faithfully,

C Mayall

Charlotte Mayall
Regional Planning Lead

Policy B4: Energy Efficiency and Design

Southern Water supports the principle of sustainable design, and as the water supplier for Bramber Parish, supports the reference in paragraph 6.13 for '2050 ready' new build to have low water demand. However, we would additionally recommend considering setting water efficiency standards through policy in terms of per capita consumption as part of any sustainability requirement for new development.

According to the Environment Agency's Final Classification (2013), Southern Water's water supply area is classified as an area of 'serious water stress'. Opting for higher water efficiency standards in new development would contribute to the mitigation of climate change through sustainable design as envisaged by the National Planning Policy Framework (NPPF) 2018 Paragraph 146 which states that '*plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for [...], water supply...*'

Building Regulations Approved Document G, requirement G2 Water Efficiency part (2)(a) sets a standard requirement of 125 litres per person per day (l/p/d), with an optional requirement in part (2)(b) for 110 l/p/d if required by the local authority. Southern Water believe that the provision of this higher optional standard as a requirement through development plan document policies would ensure greater all round sustainability in new development, in conjunction with other measures such as energy efficiency.

Should the Council wish to aim for more ambitious water efficiency measures, Southern Water will also support these, in line with our 'Target 100' programme to reduce average water consumption to 100 l/p/d by 2040. For further information see the link below;

<https://www.southernwater.co.uk/the-news-room/the-media-centre/2019/february/target-100-our-bold-new-initiative>

Proposed amendment

Accordingly, we propose the following (new text underlined) is added to criterion e of Policy B4:

e. Meeting water efficiency standards of 110 litres per person per day (or lower), for example by reducing water consumption through the use of grey water systems.

Policy B7: Protection and Maintenance of Local Green Spaces

Southern Water understands the desire to protect Local Green Spaces of particular importance to the community. However, we cannot support the current wording of the above policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.

The National Planning Policy Framework (NPPF) (2018) establishes in paragraph 101 that Local Green Space policies should be consistent with those for Green Belts, as highlighted in Policy B7. However, the NPPF Paragraph 143 sets the intention of ruling out inappropriate development '*except in very special circumstances*'. Paragraph 144 explains that special circumstances exist if the potential harm of a development proposal is clearly outweighed by other considerations, whilst Paragraph 146 identifies that '*certain other forms of development are also not inappropriate*' in the Green Belt, including '*engineering operations*'. The current wording of Policy B7 does not make allowance for very special circumstances to be considered.

Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential wastewater infrastructure required to serve new and existing customers. This is because there are limited options available with regard to location, as the infrastructure would need to connect into existing networks. The draft National Planning Practice Guidance recognises this scenario and states that '*it will be important to recognise that water and wastewater infrastructure sometimes has needs particular to the location (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered*'.

Proposed amendment

Therefore we propose the following addition to the wording of Policy B7:

Local policy for managing development on a Local Green Space should be consistent with policy for Green Belts (NPPF para 145). Proposals for built development on will not be permitted unless it can be clearly demonstrated that it is required to enhance the role and function of that Local Green Space, or it can be demonstrated that very special circumstances exist, for example where it is essential to meet specific necessary utility infrastructure needs and no feasible alternative site is available.

Additional policy on the provision of water and wastewater infrastructure

Southern Water is the statutory water and wastewater undertaker for Bramber and as such has a statutory duty to serve new development within the parish.

Although there are no current plans, over the life of the Neighbourhood Plan, it may be that we will need to provide new or improved infrastructure either to serve new development and/or to meet stricter environmental standards. It is therefore important to have policy provision in the Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements.

We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2018) paragraph 28 establishes that communities should set out detailed policies for specific areas including *'the provision of infrastructure and community facilities at a local level'*. Also the National Planning Practice Guidance states that *'Adequate water and wastewater infrastructure is needed to support sustainable development'*.

Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.

Proposed amendment

To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows:

New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan