

<b>REPORT TO:</b>	<b>Planning Policy Committee – 26 January 2023</b>
<b>SUBJECT:</b>	<b>Water Resources Management Plan Consultations (WRMP)</b>
<b>LEAD OFFICER:</b>	<b>Charlotte Hardy, Senior Environmental Assessment Officer</b>
<b>LEAD MEMBER:</b>	Councillor Richard Bower
<b>WARDS:</b>	<b>All wards</b>
<p><b>CORPORATE PRIORITY / POLICY CONTEXT / CORPORATE VISION:</b></p> <p>The recommendations supports:-</p> <p><b>Supporting our environment to support us: -</b></p> <ul style="list-style-type: none"> <li>• To consider climate change, sustainability, biodiversity and the environment in everything the council is responsible for and encourage its community and local businesses to do the same.</li> <li>• Protect and enhance our natural environment.</li> </ul> <p><b>Delivering the right homes in the right places:</b></p> <ul style="list-style-type: none"> <li>• Use our expertise to influence the local housing market, working with the right partners from all sectors, to develop the housing and infrastructure that we need;</li> <li>• Use the planning system to create great new places and improve our existing places, where new homes meet the needs of current and future generations;</li> <li>• Ensure the existing housing stock in the district (private sector and council owned) is maintained to a high standard.</li> </ul>	
<p><b>DIRECTORATE POLICY CONTEXT:</b></p> <p>The proposed responses to these consultations will contribute towards protecting the district's natural environment assets and promote economic growth in a sustainable manner, striking the balance between the need for development and the protection of scarce resources.</p> <p>It will also contribute towards ensuring that buildings are safe, healthy and sustainable for current and future generations, and to protect public health by focusing our work on the quality of what we eat, where we live and work, the air we breathe and the land we stand on.</p>	
<p><b>FINANCIAL SUMMARY:</b></p> <p>The draft plans subject to consultation that are the focus of this report are not owned or under the responsibility of the council to produce and so there is no direct budgetary or financial impact.</p>	

## **1. PURPOSE OF REPORT**

- 1.1. To brief the Committee on the key messages from the current consultations being held on the regional and individual water company Water Resources Management Plans (WRMP). The WRMP relevant to Arun include Southern Water, Portsmouth Water and Icosa Water plans related to maintaining water supplies into the future.
- 1.2. The current draft plans are being consulted from 14 November until 20 February 2023 following which it is anticipated that the water companies shall take account of the responses in forming their final plans for consultation in autumn 2023.
- 1.3. Proposed responses to each of the consultations are presented for consideration in Appendices 2 - 5.

## **2. RECOMMENDATIONS**

- 2.1. Planning Policy Committee resolve to:-
  - i. Note the content of the draft Best Value Regional Plan, the Southern Water draft Water Resources Management Plan, the Portsmouth Water draft Water Resources Management Plan and Icosa Water, where they affect Arun District.
  - ii. Agree the proposed responses to the draft Best Value Regional Plan (Appendix 2); the Southern Water draft Water Resources Management Plan (Appendix 3); the Portsmouth Water draft Water Resources Management Plan (Appendix 4) and the Icosa Water draft Water Resource Management Plan (Appendix 5).

## **3. EXECUTIVE SUMMARY**

- 3.1. The report provides a brief overview of each of the draft plans from Water Resource South East and the three water companies that supply water in the district, Southern Water, Portsmouth Water and Icosa Water. It details those proposals that are intended to apply within the District or that may impact future water supplies to local residents of the District.

## **4. DETAIL**

- 4.1. There are a number of consultations currently being carried out that relate to keeping water supplies going into the future in the face of population growth, climate change and environmental impacts. These include a consultation by Water Resource South East (WRSE) on their draft Best Value Regional Plan and separately, individual company Water Resource Management Plans that are relevant to Arun District, which include Southern Water, Portsmouth Water and Icosa Water.
- 4.2. This report, therefore, provides an overview of the main content of each of these plans and the particular matters affecting Arun District. As these consultation plans are all at draft stages, they are subject to change taking into account consultation responses, before the final plans are published. All the current consultations are being consulted upon in parallel from 14 November 2022 until 20 February 2023. Any representations made at this stage, are to be sent direct

to DEFRA and copied to the relevant plan organisation.

- 4.3. The anticipated timetable (see Appendix 1) following this early non-statutory consultation in 2022, is to:-

**Early 2023**

- Undertake a further non-statutory consultation on the regional plan; and
- Undertake statutory consultations on the draft water company WRMP.

**End of 2023 –**

- Final publication of a regional plan;
- Underpinned by final publication of individual water company WRMP;

**2024**

- Water company business plans investing in the WRMP schemes and activities over the next 5 years

**2025**

- WRMP delivery

- 4.4. The plans are flexible and are shown for the next 10-year period, from 2025 - 2035, and due to the level of uncertainty plans need to respond to a range of scenarios e.g. population growth and climate change. To assist, the regional plan which takes a longer-term view, will be updated every 5 years to inform the water companies WRMP. The regional plan informs the individual companies plans.

Draft Water Resource South East (WRSE) Best Value Regional Plan

- 4.5. This plan covers the long-term period looking forward from 2025-2075. It sets out the actions and investments needed to secure water supplies into the future and is being used to inform the plans of the region's 6 water company plans. This is the first time that a long-term plan of this nature has been produced at a regional level.
- 4.6. The plan presented is a 'best value' plan that considers a range of factors alongside economic costs and seeks to achieve an outcome that benefits customers, the environment and wider society. It contains a mix of options that balance ambitious reductions to water leakage and consumption against the need to invest in new sources of water supply, water efficiency, recycling and reuse water resources. Three main factors will affect the amount of additional water is needed in the future: -
- Population growth
  - Climate change
  - Environmental improvements;
- 4.7. Climate change is to be addressed through the newer adaptive approach that the plan suggests. To help with this the plan considers 5 population growth scenarios for the southeast of between 2% to 33% over the next 50 years, including on the basis of both Office for National Statistics (ONS) figures and local authority local development plan amounts of housing development.
- 4.8. Overall, this demand and pressure means that it is expected that there will be a

significant reduction in water availability, exacerbated by climate change. This supply reduction for climate change scenarios and population change scenarios is estimated in the plans considering a range of different scenarios.

4.9. For the West Sussex area (see Background Paper 1) within the first 5-year period (2025-2030), this plan proposes: -

- A new reservoir in Hampshire (Havant Thicket);
- The construction of another reservoir within West Sussex (there is no more detail given for a location at this stage);
- Develop 6 water recycling schemes to supplement water supplies, of which one would be in Sussex;
- Investigate developing a desalination plant on the Sussex coast within this early period.

4.10. Within the adaptive part of the plan for the period beyond 2035: -

- A further 6 water recycling schemes will be needed of which one would be in East or West Sussex;
- A new reservoir in West Sussex;
- Other activities to include aquifer storage and recharge schemes; and
- A potential provision of 6 additional desalination plants, of which one may be needed in Sussex (Background Paper 1 – p41).

4.11. Finally, across the whole plan period (2025 - 2075) it is also intended that there will be 4 significant transfers (e.g. piping water supplies long distance) from outside the southeast. These will be from Grand Union Canal moving water from Birmingham to London and another moving water from River Severn to River Thames. Ultimately, these have some indirect impacts on Arun residents, through transfers to Southern Water supplies from at least 2 of these schemes (Background Paper 1 – p34).

#### Southern Water draft Water Resource Management Plan (dWRMP)

4.12. Southern Water's 'core pathway' in the dWRMP looks only up to 2030, however, it then branches into 3 scenarios for the next 5 years and after 2035 separates into a further 9 scenarios.

4.13. Within the initial 2-year period of 2023 - 2035, it is proposed that there will be a continued focus on demand reduction, then turning towards increased water resource supply, availability and reliability.

4.14. For the Central area identified in this plan, there are 4 schemes under resource development that will have direct and indirect impacts to Arun. The main one with direct impacts is a proposed water recycling scheme to be sited at Ford treatment works and the laying of pipework associated with this for connection up to Hardham. This is scheduled for completion in 2027-28.

4.15. The indirect impacts will be in terms of a desalination plant near the tidal River Arun. At present it is hard to predict the exact impact it may have as its precise location is unclear but should be made clear in the plan. Beyond any localised impact, it may mean that supplies will be increased overall to relieve pressure

on existing transfers. The other indirect impacts will be within the National Park area, as Nitrate catchment schemes are included at Long Furlong and North Arundel.

4.16. The costs overall across the next 3 price review periods, would be £4,154mil and so, if as presented, would increase customer bills over the 2019/20 by £84.57 in 2025 - 2030, up to £178.14 in 2035-2040.

#### Portsmouth Water draft Water Resource Management Plan (dWRMP)

4.17. Portsmouth Water's dWRMP similarly, covers what needs to be delivered in all scenarios over the first five years of their plan. From 2030, they have identified 3 scenarios based on different housing forecasts. Beyond this period the dWRMP considers a greater number of scenarios.

4.18. The core approach of the dWRMP is to seeks to address: -

- High environmental protection;
- High climate change impacts;
- And local authority housing numbers.

4.19. The dWRMP considers that these 'resilient choices' will mean that there is little variation in impact arising from the various scenarios, as resilience planning will be a robust response whatever occurs.

4.20. Though the Portsmouth Water network is well connected allowing them to move water around easily, they have identified nevertheless, that improvements are needed to a pumping station in West Sussex. The precise location is not stated but should be clarified. This project is scheduled to be completed by 2030.

4.21. Finally, once Havant Thicket reservoir is established, it would be expected that their supplies to Hampshire could increase in capacity. After this date, it would be expected that the supply to West Sussex would continue but in varying amounts, as Southern Water's own schemes to supplement supplies are realised.

4.22. In terms of costs, this plan states that £243mil will be needed to deliver the 50-year plan and that this equates to an additional £5 on bills in 2025 - 2030, increasing to £14 from 2046-2051. This is justified on the basis of being one of the most efficient water companies currently with the lowest average water bill across England and Wales.

#### Icosa Water draft Water Resource Management Plan

4.23. This water company is a newer water company serving a limited number of Arun residents. This is through variation agreements, meaning the areas where they operate are called 'inset areas'. Potable water supplies from this company are only to residents of the new development at Dappers Lane, Angmering, approved under application A/76/20/PL and later stages of Hampton Park.

4.24. The potable water supplies will be provided through a negotiated bulk supply from Southern Water, as Icosa have none of their own sources. Icosa Water state within their draft Water Resource Management Plan, that they are satisfied by the content of the existing Southern Water WRMP 2019, that they will have

sufficient supplies for the length of their plan, however, they advise baseline supply and demand, forecasting uncertainties and headroom assumptions be reviewed again with regard to water transfer which would come from the Sussex North Water Resource Zone, to ensure balance over the plan period.

- 4.25. Icosa Water state that to manage demand, customers and residents served by them shall automatically have water meters installed, as well as the installation of water efficient appliances and fixtures on new sites.
- 4.26. The baseline figures over future demand will also need reviewing when planned developments are completed taking into account drought conditions. Southern Water could refuse to provide the full amount of the negotiated bulk supply, to ensure protection for their own customers and supplies in such circumstances. Icosa therefore, expect that any alteration to the bulk supply should be proportionate to the constraint and similar restrictions might need to be applied by both companies.

## **Conclusion**

- 4.27. It is recognised that the district and wider southeast is within a water stressed region, as demonstrated by the severity of droughts earlier in the year and therefore, supplies need to be supplemented into the future. Therefore, there is support for the demand side actions and intended reductions in leakage.
- 4.28. Though the water recycling scheme at Ford is supported, issues around engagement with all stakeholders, particularly taking account of the limited land under Southern Water's control, needs to be made. It is further necessary to get clarity over the location of the desalination plant for all to be able to accurately plan for this (e.g. the significant potential constraints applicable to locations that may be being considered along the Arun shoreline, especially in the vicinity of the river and tidal range).
- 4.29. Further points that the regional and company plans should consider include:-
- Ensuring that resilience is also considered from the point of view of flooding and sea level change and its impact on water supply infrastructure in particular, vulnerable locations along the coast and river tidal reaches;
  - That population and development scenarios take adequate account of the Government's Standard Housing Methodology and affordability uplift formula which may increase population demand figures above demographic trend.

## **5. CONSULTATION**

- 5.1. An internal consultation has been carried out with Technical Services to inform the potential responses, especially that to the Southern Water draft Water Resources Management Plan.

## **6. OPTIONS / ALTERNATIVES CONSIDERED**

- 6.1. To consider and respond to the consultations and where necessary take account of their content, through any necessary integration into strategies or plans that the Council may create.

6.2. To note the consultations but not to incorporate their content where needed or formally respond at this stage.

## **7. COMMENTS BY THE GROUP HEAD OF FINANCE/SECTION 151 OFFICER**

7.1. As a consultee there are no financial implications from the content of this report.

## **8. RISK ASSESSMENT CONSIDERATIONS**

8.1. By responding to the consultations the Council may be able to influence the form of the final plans. Not doing so may open risk of future issues with water supplies and connected infrastructure affecting development and the residents of Arun.

## **9. COMMENTS OF THE GROUP HEAD OF LAW AND GOVERNANCE & MONITORING OFFICER**

9.1. As a consultee and stakeholder there are no direct legal or governance implications for the Council.

## **10. HUMAN RESOURCES IMPACT**

10.1. There would be no human resource impacts.

## **11. HEALTH & SAFETY IMPACT**

11.1. There are no direct Health and Safety implications arising from this report's recommendations.

## **12. PROPERTY & ESTATES IMPACT**

12.1. There are no direct implications for property and estates from the content of this report.

## **13. EQUALITIES IMPACT ASSESSMENT (EIA) / SOCIAL VALUE**

13.1. The Council is a consultee and the documents being consulted on are the responsibility of other organisations and therefore, there are no direct implications for the Council regarding equalities.

## **14. CLIMATE CHANGE & ENVIRONMENTAL IMPACT/SOCIAL VALUE**

14.1. There will be no direct impacts to the environment as the Council is only a stakeholder on the plans. It is hoped that overall due to the plans being around ensuring water supplies into the future, there will be a positive improvement to the natural environment, as well as living conditions of residents.

## **15. CRIME AND DISORDER REDUCTION IMPACT**

15.1. There are no implications from this report on crime and disorder.

## 16. HUMAN RIGHTS IMPACT

16.1. No human rights would be impacted by this proposal.

## 17. FREEDOM OF INFORMATION / DATA PROTECTION CONSIDERATIONS

17.1. As the Council is purely responding to a statutory consultation being carried out by Water Resources Southeast (WRSE) and Southern Water (SWS), there are no direct implications in terms of data protection.

### CONTACT OFFICER:

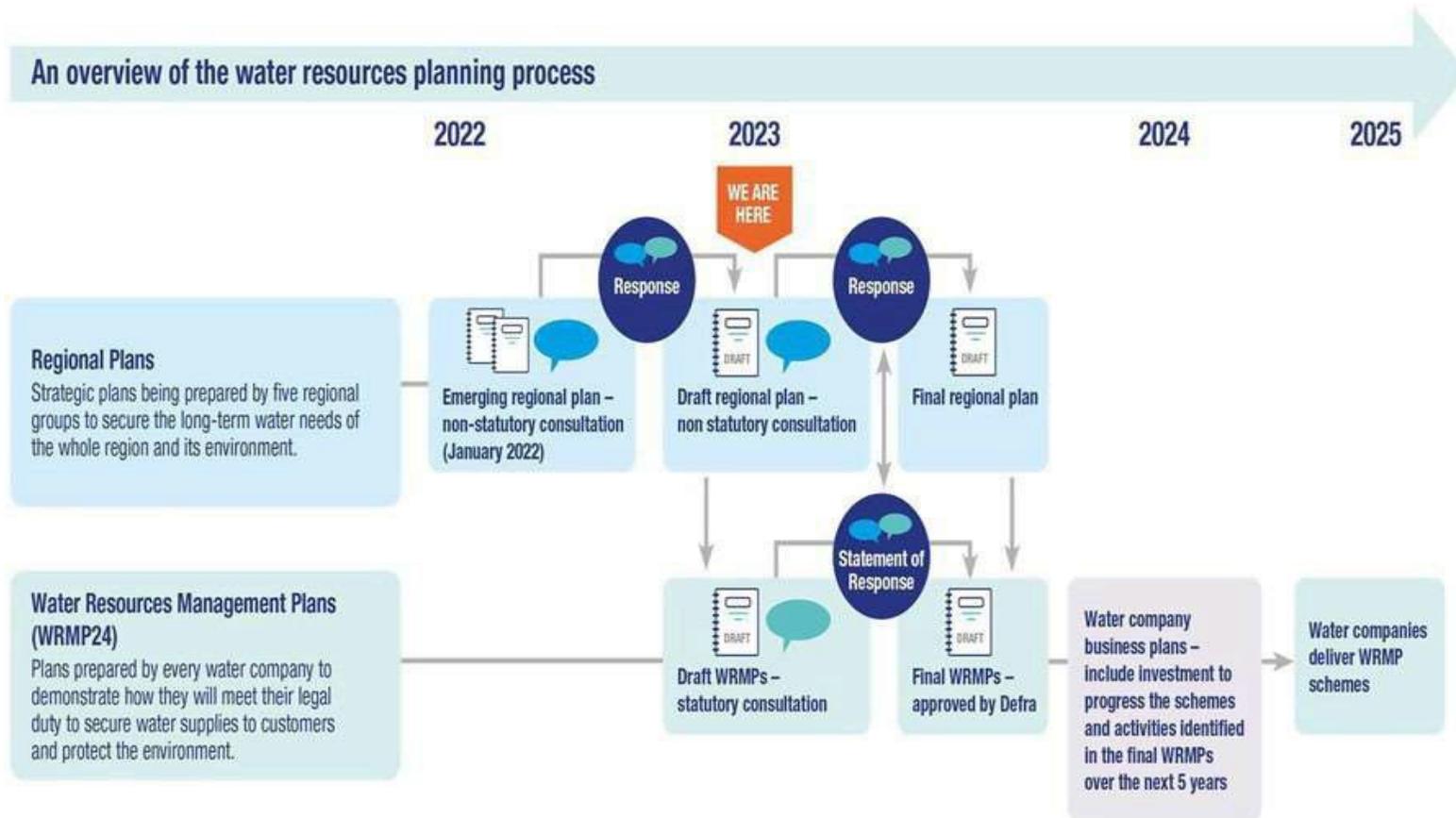
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Name: Charlotte Hardy  
Job Title: Senior Environmental Assessment Officer  
Contact Number: 01903 737794

### BACKGROUND DOCUMENTS:

1. [Water Resources South East \(engagementhq.com\)](http://engagementhq.com)
2. [Water Resources Management Plan \(southernwater.co.uk\)](http://southernwater.co.uk)
3. [Have your Say Portsmouth water \(engagementhq.com\)](http://engagementhq.com)
4. [Icosa Water draft Water Resource Management Plan](#)  
[scroll down, Water Resource Management Plan listed towards the bottom of the page]

# Appendix 1 Timetable



*Appendix 2: Proposed Response to WRSE Best Value Regional Plan*



Arun District Council  
Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex BN17 5LF

Tel: 01903 737500  
email:  
neil.crowther@arun.gov.uk  
[www.arun.gov.uk](http://www.arun.gov.uk)

25 January 2023

Please ask for:  
Neil Crowther  
Growth  
Direct Line: 01903 737839

WRSE draft regional plan consultation  
c/o Adams Hendry Consulting Ltd  
Sheridan House, 40-42 Jewry Street  
Winchester  
SO23 8RY

Your Ref:

Our Ref:

Dear Sir/Madam

**Consultation on Water Resource South East (WRSE) Draft Best Value Regional Plan for the South East (November 2022)**

Thank you for the opportunity to comment on the above document setting out the preferred Best Value Options selected for ensuring water supplies into the future.

Arun District Council (Arun) welcomes strategic long term planning and investment for infrastructure and for securing resources for a sustainable future in the face of the impacts of climate change, alongside the need to deliver economic growth, housing and prosperity for existing and future generations.

The methodology of forecasting a range of more and less challenging futures based on climate change and differing levels of consumption/supply efficiency is supported as a robust approach to flexible infrastructure planning over the long term – particularly as this also incorporates developments within the planning pipeline based on adopted and emerging local plans as part of the initial period covered prior to the adaptive approach being taken.

Under all future scenarios both the Havant Thicket reservoir and water recycling for the Littlehampton catchment at Ford are expressed as being necessary. Arun is supportive of the use of water recycling schemes, although would encourage that early engagement is taken with all stakeholders, including landowners and developers whose land will be affected by associated pipework. This is especially important as one of the strategic sites contained in the adopted Arun Local Plan 2018 is sited to the south and so is important to sustainable development for the district. The need for early engagement has been communicate previously in the response letter dated 11 May 2018.

It is also noted that it is intended for one desalination plant within the first part of the plan, covering 2025-2035, that is simply mentioned as 'along the Sussex coast' and that this is currently being investigated. Arun would wish to make clear that siting along the Arun coast would unlikely to be feasible or acceptable for a combination of reasons, including existing built up development and communities along the coast (e.g. at Littlehampton and Bognor Regis) and having sensitive nature sites of national and international importance (e.g.. Pagham SPA and Climping SSSI) and the landfall siting of the potential Rampion 2 pipework.

Arun is therefore supportive of the overall content of the draft Best Value Regional Plan with the exception of this proposal. There is also clearly a need for early engagement over the delivery of some of the potential schemes, such as the Littlehampton catchment water recycling scheme and acknowledgment that the suggested siting of a desalination plant on Arun's shoreline is not a realistic or appropriate proposal.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours Sincerely

Neil Crowther  
Group Head of Planning

Growth  
**Arun District Council**

*Appendix 3: Proposed Response to Southern Water's draft Water Resource Management Plan (dWRMP)*



Arun District Council  
Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex BN17 5LF

Tel: 01903 737500  
email: [neil.crowther@arun.gov.uk](mailto:neil.crowther@arun.gov.uk)  
**[www.arun.gov.uk](http://www.arun.gov.uk)**

Water Resource Management Plan (Southern Water)  
Water Services, Department for Environment, Food and  
Rural Affairs  
Seacole Ground Floor, 2 Marsham Street  
SW1 4DF

Your Ref: .

Our Ref:

25 January 2023

Please ask for:  
Neil Crowther  
Growth  
Direct Line: 01903 737839

Dear Sir/Madam

### **Consultation on Southern Water's draft Water Resource Management Plan (dWRMP)**

Thank you for the opportunity to comment on the documents forming the consultation on the Southern Water draft Water Resource Management Plan.

Arun District Council (Arun) welcomes strategic long-term planning and investment for infrastructure and for securing resources for a sustainable future in the face of the impacts of climate change, alongside the need to deliver economic growth, housing and prosperity for existing and future generations.

Arun understands the reasons why T100, connected with reducing usage, is no longer proposed for inclusion in the plan with the original timings, particularly, considering comments made previously (11 May 2018 – Appendix A) with respect to achieving this across the district. However, we would wish this to be included going forward, to ensure that communities have greater resilience to the impacts of climate change. It would also have the benefit of preventing harmful impacts to sensitive designated nature sites.

Arun notes the alteration from previously suggested 'Resource Hubs' to a water recycling scheme to be located at the Ford treatment works. Though supportive of the overall scheme, Arun reiterates the need for engagement with all stakeholders, including landowners and developers whose land will be affected. This is crucially important, as Arun is aware that Southern Water only control the land immediately around the treatment works. A strategic housing site of the adopted Arun Local Plan 2018 is directly sited on the southern boundary of the works and has outline approval. As such, any mitigation, such as noise or odour, especially taking account of future occupiers, should be incorporated into delivery of this scheme.

A desalination plant is included within the plan in the short term and is considered necessary in all scenarios. However, it is not evident where the potential location is intended to be. In one part of the plan it is referred to as 'near the tidal River Arun' and yet within another it is clearly marked as being against the Sussex Brighton Resource Zone catchment. Clarity is therefore, needed in the final document over its proposed location, to aid all stakeholders in its planning going forward.

Specifically, with respect to siting in the vicinity of either side of the tidal River Arun, the Council would wish to make its view clear that siting along the Arun coast would unlikely to be feasible or acceptable for a combination of reasons, including:-

- Planned Strategic allocations e.g. the Littlehampton Economic Growth Area (LEGA) and West Bank development within the adopted Arun local plan 2018;
- Existing built-up development and communities along the coast (e.g. at Littlehampton and Bognor Regis) and issues of amenity (e.g. noise, odour), access, maintenance to existing and new residents;
- The sensitive nature habitats and sites of national and international biodiversity importance (e.g.. Pagham SPA and Climping SSSI);
- The recent tidal breach that occurred at Climping in winter of 2020 and any additional impacts from climate change;
- The important open landscape/ strategic gaps (including views from the South Downs National Park) at that location with land protected through at least one covenant;
- The standard of the defences on the western side of the River Arun are variable and so their improvement would need to be factored into this location; and
- The potential landfall siting of the proposed Rampion 2 pipework.

The Local Plan and policies map illustrating these matters can be viewed at <https://www.arun.gov.uk/adopted-local-plan>.

On a wider scale, for the Arun coastline, account should also be taken of the Kelp Restoration Project focused on the Sussex Bay, plus that it has been agreed by the Council to commission consultants to look at whether to apply any Coastal Change Management Areas (CCMA).

Arun recognises that the dWRMP is also geared towards actions to tackle demand reduction and efficiency (e.g. metering and design standards) and leakages in the network (new water mains). Together with some of the key infrastructure investments (e.g. desalination, recycling hubs and reservoirs) these all have significant cumulative long term cost implications at a time of inflation and cost of living pressures that may persist into the medium term. The Council therefore, supports the adaptive approach and would wish to see emphasis on best value measures that are flexible, equitable and low cost to prevent excessive additions to customer bills. For example as a council Arun are aware that park home residents can perhaps questionably, receive the costs for leakages, due to there being no incentive for site owners to do these in a timely fashion. These manifest both in terms of cost but also physical disruption to their supplies.

In summary, though Arun are supportive of the water recycling in the Littlehampton catchment, it would encourage retention of the T100 target going forward; that effective engagement takes place on the proposed water recycling scheme at Ford and that additional clarity is needed over the intended location of the desalination plant.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours Sincerely

Neil Crowther

Group Head of Planning

Growth  
**Arun District Council**

## Appendix A: Previous comments provided in 2018

Ian McAuley (Chief Executive Officer) Southern House,  
Yeoman Road, Worthing BN13 3NX

Arun District Council Arun Civic Centre Maltravers Road Littlehampton  
West Sussex, BN17 5LF



Tel: 01903 737500  
Fax: 01903 730442  
DX: 57406 Littlehampton  
Minicom: 01903 732765  
e-mail: kevin.owen@arun.gov.uk

Date 11 May 2018

Your Ref:

Our Ref: KR...

Please ask for:  
Karl Roberts  
Director of Place  
Direct Dial: 01903 737760

Dear Ian McAuley,

**Consultations: 'It's your water too' (Business Plan 2020-25); 'Securing a resilient future for water in the south East'(50 year Water Resources Management Plan); 'Our plans to tackle droughts';**

Thank you for the opportunity to be consulted on the above documents setting out your business plan for the period 2020-2025 and your Water Resources Management Plan (WRMP) for the next 50 years.

Arun District Council (Arun) welcomes strategic long term planning and investment for infrastructure and for securing resources for a sustainable future in the face of the impacts of climate change, alongside the need to deliver economic growth, housing and prosperity for existing and future generations.

### **'It's your water too' (Business Plan 2020-25)**

In this regard, the business plan's focus on 5 long term priorities: Resources; Environment; Value; Communities and Economy is supported. The transformation targets to tackle these priorities are also supported. In particular, the 'Target 100' which seeks to deliver a reduction in domestic water use from 131 l/pd to 100 l/pd. Part of that strategy is to increase the percentage of households with water meters from 80% to 100% (in some places) and reducing leakage by 15% and this is supported but with the following comments:-

- A large proportion of those properties which are not currently served by water meters are likely to be sub-divided properties such as flats and Houses of Multiple

Occupation where rates of owner occupation are lower than average and where there are higher rates of vulnerable people occupying them. There may be practical difficulties in these properties that would make it costly and difficult to provide a meter for each individual flat/bed-sit. The occupier (a tenant or leaseholder) is likely to be reliant on the consent of the landlord or freeholder in order to have a water meter installed.

- Any charging regime to encourage households take up of water meters needs careful consideration to ensure that this would not disproportionately affect vulnerable people and those who are financially disadvantaged. The approach preferred by the Council would be for Southern Water to use the powers it has to install water meters where it is practical to do so.
- Mobile Home Park Estates vary in size from a handful to several hundred but typically have a few dozen mobile/ park homes on them. Many of these have a single meter for the whole site, with the cost of water split by the number of residential units on the site and passed on to residents. The site owners are allowed by law to add an administration fee to these, and we are often contacted by residents who complain that the administration fees are excessive and unequitable because of differing practice with households either using water efficiently or wastefully. The Council is often contacted by residents of mobile homes expressing their preference to an individual water meter. These are residential sites. The Council would welcome the installation of water meters on each individual plot on park home sites.

With respect to the 'Catchment First' approach the council welcomes this as the Aldingbourne Rife has failed WFD standards as a result of outflows from the Tangmere treatment works to the north. The Council further considers that this approach would also tie in with increasing the leisure potential (formal and informal) and environmental education alongside that of eco-systems management, access to nature and flood resilience. Arun would be pleased to be involved as part of the proposed Arun catchment study in order to scope potential synergies with the environmental and infrastructure proposals set out in its emerging Local Plan.

Arun is further, interested and supportive of the business plans' proposals for establishing 'Resource hubs' (e.g. transforming water treatment works into water recycling for local river and catchment resilience and heat capture and renewable energy generation for community use etc.). In particular, as technology improves, direct recycling of waste water to potable water should be considered if the only barrier is public perception e.g. an educational programme could be considered with demonstration projects. This also offers a reduced infrastructure footprint (e.g. need for associated distributive pipelines).

The planning implications of 'Resource hubs' will need to be discussed at the earliest stages to ensure that such facilities can be aligned with other planned developments and also to ensure that environmental, landscape and transport implications and impacts on communities (where such facilities arise largely in rural settings) can be minimised and mitigated for example:-

- Ford Waste Water Treatment Works includes a sludge treatment works which produces soil conditioner. This was previously dried prior to being spread on agricultural land. More recently it has not and is spread "wet". This has coincided with an increase in complaints about odour from spreading of soil conditioner. We would encourage the return to drying of soil conditioner prior to use to avoid odour

nuisance being caused by its spreading.

- The potential introduction of a food waste treatment any 'Resource hub' would be a welcome facility and we encourage you to liaise with West Sussex County Council as the Waste Disposal Authority. As one of the Waste Collection Authorities we need to design our collection services around the disposal facilities available, so advance notice of the introduction and location of such a facility is essential.

Arun is supportive of the Bathing Water Enhancement Programme which is being delivered in the current business plan cycle and we support it being extended into the 2020-2025 business cycle. In particular we are keen to see resourcing of initiatives to improve the bathing water quality at our two main tourist beaches: Littlehampton and Bognor East, neither of which has an excellent rating, and also at Felpham and Bognor Aldwick, both of which have the lowest legally compliant bathing water quality rating (sufficient), and are on a downward trajectory.

The bathing water quality has a significant impact on the attractiveness of the coast in Arun as a tourism destination which can have a significant economic impact on the area.

### **Securing a resilient future for water in the south East'(50 year Water Resources Management Plan) and 'Our plans to tackle droughts'**

The methodology of forecasting a range of more and less challenging futures based on climate change and differing levels of consumption/supply efficiency, appears a robust approach to flexible infrastructure planning over the long term – particularly as this also incorporates developments within the planning pipeline based on adopted and emerging local plans. The Government is currently proposing changes to national planning policies (e.g. draft National Planning Policy Framework consultation closes on 10<sup>th</sup> May) which may potentially increase unplanned development pressure in locations and quantities that fall outside of the local plan. Arun would encourage Southern Water and indeed other infrastructure providers and utilities to fully engage with the Government in responding to national policy consultations, on the risks that unplanned development may pose to the soundness of their own business plans and long-term management plans, frustrating delivery of future development and resource resilience and mitigation in the face of climate change.

Depending on the futures forecast the Water Resources Management Plan identifies a number of infrastructure proposals that may be needed in the sub region. Under all future scenarios for the period 2025-2030 on page 16, it identifies the need for A potential 'Resource hub' for recycling/reuse of water that would fall within the Arun local planning authority area.

Such proposals have the potential for local environmental impact in terms of odour, noise and air quality, and ADC would expect and require these matters to be mitigated against through the planning process.

Early engagement with all stakeholders including landowners and developer interests should be progressed. This is especially relevant because the Arun Local Plan (2011-2031) which is expected to be adopted by this Council in July, sets out Strategic Allocations for housing and employment which need to be factored into any decision making in terms of proximity to existing or new communities, any necessary land take and infrastructure footprint. Mitigation would also need to be included during any construction phase, including any associated pipeline.

The Council also note that there is mention of a potential desalination plant on the tidal stretch of the River Arun (scheme 14; page 24), which also falls within the authority's planning remit. As desalination is only mentioned under the most extreme scenario for 2035-2040 on page 17, the Council would appreciate confirmation for the time period within which this should be expected, particularly to ensure it is considered within evidence for future planning documents.

If it is deemed that this scheme is necessary then again early engagement with all stakeholders would be needed to ensure that an appropriate location is identified taking account sensitive landscapes and features; possible impacts of climate change (e.g., flooding) and planned development and supporting infrastructure are considered/incorporated.

Finally, in relation to the potential for Aquifer Storage and Recovery facilities, should proposals emerge within the district but within the South Downs National Park authority area, you should take into consideration closed landfill sites in the area and their potential for impacting the groundwater in any confined aquifer which would need to be modelled.

Yours sincerely

Karl Roberts

Director of Place

*Appendix 4: Proposed response to Portsmouth Water draft Water Resource Management Plan (dWRMP)*



Water Resource Management Plan Water Services  
(Portsmouth Water dWRMP Consultation)  
Department for Environment, Food and Rural Affairs  
Seacole Ground Floor, 2 Marsham Street  
SW1P 4DF

Your Ref: .

Our Ref:

Dear Sir/Madam

**Consultation on Portsmouth Water's draft Water Resource Management Plan (dWRMP)**

Thank you for the opportunity to comment on the consultation documents forming the Portsmouth Water draft Water Resource Management Plan.

Arun District Council (Arun) welcomes strategic long term planning and investment for infrastructure and for securing resources for a sustainable future in the face of the impacts of climate change, alongside the need to deliver economic growth, housing and prosperity for existing and future generations.

It is noted that there is mention that it has been identified that a pumping station in West Sussex needs improvement, although it is not specified as to where this is to be located. If this is located within, or near the boundaries, with Arun it would be appreciated to be kept informed of when this is planned.

The designation of the Portsmouth Water area as being 'water stressed' is acknowledged and noted for a rollout of associated metering. It is also acknowledged that Havant Thicket will be operational in 2029 which will add 9MI/d to supplies, which will add resilience to available resources. It is also noted that from 2040 transfers across to the Southern Water area will vary and may potentially stop after 2049.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours Sincerely

Neil Crowther  
Group Head of Planning

Growth  
**Arun District Council**

Arun District Council  
Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex BN17 5LF

Tel: 01903 737500  
email: [neil.crowther@arun.gov.uk](mailto:neil.crowther@arun.gov.uk)  
**[www.arun.gov.uk](http://www.arun.gov.uk)**

25 January 2023

Please ask for:  
Neil Crowther  
Growth  
Direct Line: 01903 737839

*Appendix 5: Proposed Response to Icosa Water draft Water Resource Management Plan*



Arun District Council  
Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex BN17 5LF

Tel: 01903 737500  
email: [neil.crowther@arun.gov.uk](mailto:neil.crowther@arun.gov.uk)  
**[www.arun.gov.uk](http://www.arun.gov.uk)**

Water Resource Management Plan Consultation  
DEFRA Water Resources  
Seacole, 2 Marsham Street  
London, SW1P 4DF

25 January 2023

Your Ref: .

Please ask for:  
Neil Crowther  
Growth  
Direct Line: 01903 737839

Our Ref:

Dear Sir/Madam

**Consultation on Icosa Water draft Water Resource Management Plan (October 2022)**

Thank you for the opportunity to comment on the consultation documents forming the Icosa Water draft Water Resource Management Plan.

Arun District Council (Arun) welcomes long term planning and investment for infrastructure and for securing resources for a sustainable future in the face of the impacts of climate change, alongside the need to deliver economic growth, housing and prosperity for existing and future generations

Though the methodology provides reassurance to Arun over the figures being looked to be accommodated, in terms of the new Littlehampton residents expected to be served. It would remind Icosa of the need for a review to be carried out upon completion of these developments, especially to ensure that supplies can still be maintained during drought conditions and that new residents are aware of the alterations that will be needed.

Being a new company operating within Arun, the council and its teams, would wish to ensure that there is continued ongoing engagement on all water related issues with Icosa for proposals within their authority area.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours Sincerely

Neil Crowther  
Group Head of Planning

Growth  
**Arun District Council**