

REPORT TO:	Planning Policy Committee – 28 November 2024
SUBJECT:	Southern Water Revised Draft Water Resource Management Plan Consultation (11 September - 4 December 2024)
LEAD OFFICER:	Zac Ellwood (Interim Head of Planning Policy)
LEAD MEMBER:	Cllr Gill Yeates (Chair of Planning Policy Committee)
WARDS:	All
CORPORATE PRIORITY / POLICY CONTEXT / CORPORATE VISION:	
<p>The recommendations support:-</p> <ul style="list-style-type: none"> • Supporting our environment to support us; and • Delivering the right homes in the right places. 	
DIRECTORATE POLICY CONTEXT:	
<p>The proposed response to this consultation 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 protecting 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>	
FINANCIAL SUMMARY:	
<p>The revised draft plan subject to consultation that is the focus of this report is not owned or under the responsibility of the council to produce, there are no current or foreseen direct financial impacts on Arun District Council.</p>	

1. PURPOSE OF REPORT

- 1.1. To update the Committee on the key messages from the current consultation on Southern Water's revised draft Water Resources Management Plan 2024 (WRMP24), including any changes that may directly and indirectly affect Arun residents.
- 1.2. The WRMP24 is being consulted on from 11 September - 4 December 2024, following which Southern Water will publish a Statement of Response in early 2025. Subject to approval from DEFRA, Southern Water will then publish a final WRMP, including any changes that have been made as a result of the consultation.
- 1.3. The proposed response to this consultation is presented for consideration in Appendix 1.

2. RECOMMENDATIONS

2.1. Planning Policy Committee resolves to:-

- i. Agree the proposed response to the Southern Water WRMP24 (Appendix 1).

3. EXECUTIVE SUMMARY

3.1. The Committee may recall that a report on a number of draft Water Resources Management Plans (WRMPs) from various bodies (namely Water Resources South East, Southern Water, Portsmouth Water, and Icosa Water) was presented to the Planning Policy Committee on 26 January 2023. At that meeting, the Committee resolved that:

- a. The content of the Water Resources South East draft Best Value Regional Plan, the Southern Water draft Water Resources Management Plan, the Portsmouth Water draft Water Resources Management Plan and the Icosa Water draft Water Resource Management Plan, where they affect Arun District, be noted; and
- b. The proposed responses to the Water Resources South East draft Best Value Regional Plan; the Southern Water draft Water Resources Management Plan; the Portsmouth Water draft Water Resources Management Plan; and the Icosa Water draft Water Resources Management Plan be agreed.

3.2 Southern Water have now produced a revised draft Water Resources Management Plan 2024 updating their proposals for the region in which they operate. The WRMP24 is the subject of public consultation until 4 December 2024 and Arun District Council have been contacted and invited to comment. This report provides a brief overview of the revised plan. It considers any changes that are intended to apply within the district or that may impact future water supplies to its residents. Finally, it recommends a suitable response to the consultation on behalf of the council.

3.3 If, in the future, revised/updated WRMPs are received/consulted on from the other bodies mentioned at paragraph 3.1, these will be reported to Committee at the appropriate time.

4. SOUTHERN WATER REVISED DRAFT WATER RESOURCE MANAGEMENT PLAN 2024

4.1 Together with regional and other individual water companies, Southern Water consulted on its previous draft WRMP over the period 14 November 2022 - 20 February 2023.

4.2 Following further investigation into proposed projects, consultation feedback, updated guidance from regulators and new forecasts for population growth and climate change, Southern Water's draft WRMP was revised, hence this re-consultation. Representations are to be sent direct to DEFRA and copied to Southern Water.

4.3 The anticipated timeline following this re-consultation as stated by Southern Water, is as follows:-

2025

- Publish statement of response on WRMP24;
- Update and submit plan to the Secretary of State for the Environment;
- Publish Final WRMP; and
- Begin delivery of WRMP.

Overview

4.4 The WRMP24 sets out Southern Water's plan for how it will provide water, protect the environment, and sustain the economy for its customers for the period 2025 to 2075. It uses an adaptive planning approach which entails multiple scenarios of different combinations of growth, climate change and environmental ambition.

4.5 The WRMP24 maintains its focus on demand reduction alongside infrastructure updates, new sustainable sources of water and enhanced supply resilience as part of an adaptive approach. This is integrated with the Water Resources South East Regional Plan, hence is part of a coordinated plan for the region.

4.6 The summary notes that the challenge is to leave more water in the environment to protect some of the most sensitive habitats, while at the same time securing supplies for one of the fastest growing populations in the UK and preparing for the increased risk of drought due to climate change.

4.7 Southern Water acknowledges that significant action is needed now to invest in and create new robust, resilient and less weather-dependent water supplies, as well as finding new ways to use existing supplies more wisely. The WRMP24 says they will be harnessing the benefits of new technology, such as smart meters for customers, which will enhance better understanding of water use and help find more leaks to reduce consumption. They are committed to reaching Government targets on reducing water use five years ahead of the national deadline.

4.8 The WRMP24 also identifies a need to invest significantly in large-scale infrastructure such as new reservoirs and transfer pipelines to capture and transfer more of the rain which falls in the region. They plan to use cutting-edge technology to generate new sources of drinking water – using treated wastewater for reliable drinking water supplies (water recycling) and converting seawater into drinking water (desalination). Transfers of water from other new developments in the South East have a vital role to play and they say they are working closely with other regional water companies on long-term plans.

Detail

4.9 The key headline ambitions set out in the WRMP24 are as follows:

- **Leakage reduction:** Using new technology such as sensors in networks, analytics using AI and replacing old water mains to reduce leakage.

- **Water usage reduction:** Aiming to reduce daily average dry year water use to 110 litres per person by 2045, which is equivalent to 100 litres per person in a normal year.
- **Non-household water use:** Targeting a 9% reduction in non-household water use by 2038.
- **Water recycling:** Implementing four schemes by 2035 to turn treated wastewater into purified recycled water that can be used as a source for drinking water supplies.
- **Pipeline expansion:** Increasing pipelines to transfer water from new sources.
- **Groundwater sources:** Improving existing groundwater sources and developing new ones.
- **Desalination:** Planning four schemes after 2035 to provide drinking water from seawater.
- **New reservoir:** Constructing a new reservoir in Sussex.
- **Water storage:** Storing water from the River Test in Hampshire underground.
- **Partnerships:** Collaborating with land users and environmental groups to improve water sources, for example through the [Catchment First](#) and Catchment Resilience programmes.
- **Resilience measures:** Short-term measures to protect Hampshire's rivers during droughts until longer-term infrastructure is developed and operational.
- **Drought permits/orders:** Planning to end the use of supply side drought permits and drought orders by 2040-41.

4.10 Turning to specific targets, Southern Water aims to reduce leakage by 53% by 2050, which is greater than the 50% reduction target set by the government. They state this will be achieved through enhanced leak detection and repair, using both conventional and new technologies as well as replacing old pipes that tend to leak more frequently.

4.11 The Sussex Coast desalination option has been removed, as a suitable alternative site could not be identified when the site at Shoreham Harbour became unavailable. This was addressed in Arun's comments on the previous consultation.

4.12 The WRMP24 includes updated population and housing growth forecasts based on projections from local authority housing plans and data from the Office of National Statistics. The Committee will be aware that revisions to the National Planning Policy Framework propose mandatory housing targets for each council, which will significantly increase housing requirements. If these targets are introduced, Southern Water will need to further update their population growth forecasts.

Implications for Arun

4.13 Relevant changes to the WRMP24 for Arun District include:-

- Extension of the earliest delivery date for the Littlehampton Water Recycling Scheme from 2027 to 2030, to allow contingency for any planning, consenting and construction challenges. The council hopes that this allows for greater engagement with all affected landowners and stakeholders.

- Retention of the desalination option for Tidal River Arun, with earliest delivery delayed from 2033–34 to 2037–38 to allow for investigation and mitigation. Costs have been increased following a review of the engineering scope. The council maintains that a location on either side of the tidal River Arun for a desalination plant is unlikely to be feasible or acceptable given commitments and allocations in the Adopted Arun Local Plan, hence the need for effective engagement on this specific matter.

4.14 The overall costs of the WRMP24 are projected to increase customer bills on average each year by £53 between 2025 and 2030, £136 between 2030 and 2035, and £181 between 2035 and 2040.

Conclusion

4.15 As Arun is in a water stressed region, there is support for the demand side actions and intended reductions in leakage. The final WRMP must, however, take proper account of population projections and the government's drive to deliver more housing, which will only increase demand.

4.16 Whilst the proposals for increasing water supply are broadly supported, clarity is required around the need for and location of the proposed desalination plant, and the plans for water recycling at the Littlehampton Works. Effective engagement with all stakeholders on these proposals is accordingly critical, more so as the council embarks upon the review and update of the Arun Local Plan.

5. CONSULTATION

5.1. An internal consultation has been carried out with the council's Engineers to inform the potential responses.

5.2 An email informing of the current consultation, together with a copy of the summary document, was set to all Arun Ward Councillors by the Interim Head of Planning Policy on 13 September 2024.

6. OPTIONS / ALTERNATIVES CONSIDERED

6.1. To consider and respond to the consultation and where necessary take account of its content, through any necessary integration into strategies or plans that the council may create.

6.2. To note the consultation but not to incorporate its content where needed or formally respond at this stage. This option was discounted on the basis that ensuring a robust and continued water supply to existing and future residents is considered key to effective planning for the district and is a matter on which the Planning Policy Committee should be informed.

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

- 7.1. The report is being produced by Southern Water on how they plan to provide water, protect the environment, and sustain the economy for its customers for the period 2025 to 2075, therefore there are currently no foreseen financial implications from the content of this report. Officer time is funded from existing service budgets.

8. RISK ASSESSMENT CONSIDERATIONS

- 8.1. By responding to the consultation, the council may be able to influence the form of the final plan. 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 are no direct human resource impacts for the council.

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 document being consulted on is the responsibility of another organisation, hence 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 plan. It is hoped that overall, due to the plan 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 another statutory body, there are no direct implications in terms of data protection.

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BACKGROUND DOCUMENTS:

1. Southern Water's [revised draft Water Resource Management Plan consultation](#)

***Appendix 1: Proposed ADC Response to Southern Water's
draft revised Water Resource Management Plan 2024***



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Water Resource Management Plan Consultation
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Seacole, 2 Marsham Street,
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29 November 2024

Please ask for:

Your Ref:

Neil Crowther
Growth

Our Ref:

Direct Line: 01903 737839

Dear Sir/Madam

Consultation on Southern Water's revised draft Water Resource Management Plan 2024

Thank you for the opportunity to comment on the documents forming the consultation on the Southern Water revised draft Water Resource Management Plan 2024 (WRMP24).

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 supports the proposed measures to reduce leakage from the network through the reintroduction of a more ambitious target for reducing per capita consumption by household customers to 110l/h/d under dry conditions by 2045, as this will facilitate greater resilience to the impacts of climate change by communities and prevent harmful impacts to sensitive designated nature sites.

In respect of population and housing growth forecasts, Southern Water should be aware of proposed revisions to the National Planning Policy Framework. These include mandatory housing targets for each local authority which will significantly increase housing requirements across the board. If these enhanced targets are introduced, Southern Water will need to reassess its population growth forecasts much earlier than the draft WRMP29.

Arun welcomes the extension of the earliest delivery date for the proposed water recycling scheme at the Littlehampton Wastewater Treatment Works (WTW) at Ford from 2027 to 2030. It is hoped that this will allow for greater engagement with all relevant stakeholders, including landowners and developers whose land will be affected. Arun is aware that Southern Water only controls the land immediately around the treatment works, while the surrounding lands form part of a strategic housing site in the adopted Arun Local Plan 2018, which has outline approval. Accordingly, mitigation of issues, particularly odour and noise, should be incorporated into the planning and delivery of the scheme.

Arun notes the removal of the proposed Sussex Coast desalination option. Regarding the retained desalination option for tidal River Arun, it is considered that siting of such a facility within Arun District is unlikely to be feasible or acceptable for a number of reasons, including:-

- Strategic allocations e.g. the Littlehampton Economic Growth Area and West Bank development within the adopted Arun Local Plan 2018;
- Sites of importance for nature conservation around West Beach (e.g. Climping SSSI and Arun Valley SPA);
- Important open landscape / strategic gaps between Littlehampton and Middleton-on-Sea, and Littlehampton and Arundel;
- Substantial risk of flooding along the River Arun; and
- The potential landfall siting of the proposed Rampion 2 pipework.

These and other land use considerations are detailed in Arun's [Local Plan and policy maps](#).

There is also a lack of certainty around the need for the tidal River Arun desalination option, given that it appears in only two of the nine supply-demand scenario options. Whilst Arun appreciates that Southern Water's adaptative planning approach seeks to manage such uncertainty, Arun is at the preliminary stage of reviewing its Local Plan to cover the period 2023 to 2041. Accordingly, the council looks forward to proactive engagement around the planning for this facility so that it can be appropriately considered.

Arun recognises that the WRMP24 is geared towards actions to tackle demand reduction and efficiency (e.g. metering and design standards) and leakages in the network. Together with key infrastructure investments, including those cited above, these have significant cumulative long term cost implications at a time of inflation and cost of living pressures that may persist. Arun therefore supports emphasis on best value measures that are flexible, equitable and low cost to prevent excessive additions to customer bills.

In summary, whilst Arun District Council is broadly supportive of the WRMP24 and the proposed supply side options that may impact the district, early and effective engagement is considered to be critical, particularly in respect of the plans for the Littlehampton water recycling scheme and the desalination plant on the tidal River Arun.

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 Directorate
Arun District Council

