



Southern Water

Regulation 14 Community Consultation Response to the Coldean Neighbourhood Plan

1. What is your name?

Ryan Lownds

2. In what capacity are you making your comments?

Strategic Planning Lead at Southern Water

3. If you are responding on behalf of an organisation, please state the reason for your involvement and the name of the organisation you represent

Statutory Consultee on Neighbourhood Plans - Southern Water

4. Please provide your address (street address, city, postcode)

Southern Water Services Limited, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX

5. Do you support the Vision Statement of the draft Plan?

Support

6. Do you have any comments or suggestions on the Vision?

No Comment

7. Do you have any comments or suggestions on the Objectives of the draft Plan?

Southern Water is responsible for providing a water and wastewater service to Coldean, a suburb of Brighton and Hove.

We request the inclusion of an Objective that promotes sustainable development; seeking to protect neighbourhoods from the impact of water scarcity, flooding, and climate change.

As such, we propose the inclusion of the following Objective for the neighbourhood plan.

h.) To promote sustainable development that helps Coldean to respond to the impacts of water scarcity, flooding, and climate change into the future.

We make this recommendation because:

The south east is classified as an area of serious water stress*, and a variety of factors such as an increasing need to limit surface and groundwater abstractions, increase drought resilience, meet the needs of a growing population and adapt to climate change, all combine to present both challenges and opportunities to change the way we manage water.

* [Water stressed areas final classification 2021.odt \(live.com\)](#)

Well-designed sustainable drainage systems help to reduce the volume of surface water entering the foul sewer system – which could help to reduce localised flooding and, in turn, help to reduce the risk of pollution events. Sustainable drainage systems will therefore be key to helping neighbourhoods respond to the impacts of climate change into the future.

Please see our policy statement on Sustainable Development here:

<https://www.southernwater.co.uk/media/ny0nb3qu/our-policy-statement-on-sustainable-development-a4.pdf>

8. Do you have any comments or suggestions on the draft Plan Policies? Policies start with capital letters and are in green boxes in the Plan document. (When referring to a Policy/s please quote the Plan Policy number)

Southern Water is responsible for providing a water and wastewater service to Coldean, a suburb of Brighton and Hove.

We note that the fundamental design principles for sustainable development, supporting Policy H1, are set out within the supporting *design guidance and codes document*.

Therefore, some of our recommendations relate to a code within that document, however with direct relevance to the policy.

[Policy H1 – Design Guide – Supporting Document: Design Guidance & Codes](#)

Policy H1 Code 11.SS.02 Parking provision

We propose the following inclusion in this design code to be set out under Parking Provision.

- *Ensure any integrated 'on plot' parking spaces are designed with permeable surfacing to reduce surface water run off during wet weather periods.*

[We make this recommendation because:](#)

Sustainable drainage measures (SuDS) such as permeable surfacing help to reduce the volume of surface water entering the foul sewer system at any one time. This has been shown to help reduce localised flooding and, in turn, reduce the risk of pollution. Infiltration SuDS can also help to maintain groundwater resources into the future. Sustainable drainage systems will therefore be key to enabling neighbourhoods to respond to the impacts of climate change into the future.

Policy H1 Code 17.SD.04 SuDS

We strongly support the inclusion of sustainable drainage systems in this design code. In addition, for the reasons explained further below, we would like to see this code go further and include the following design requirements relating to the management of surface water on new developments.

- *Ensure the requirements for sustainable drainage measures on future developments comply with Brighton & Hove City Council's Sustainable Drainage SPD [SPD16 Sustainable Drainage \(brighton-hove.gov.uk\)](#)*
- *Existing flow routes and drainage features within the development site should be identified and preserved eg ditches, seasonally dry watercourses, historic ponds.*
- *To minimise the risk of sewer flooding and protect water quality, surface water will not be permitted to discharge to the wastewater network*

We make this recommendation because:

- Climate change now demands we re-think and re-design communities and more resilient and efficient homes are essential – conserving both energy and water. However, we also need to ensure that design will not mean that rainwater continues to run off homes and surfaces so fast that it causes flooding and storm discharges into rivers and seas. By controlling the rate and volume of surface water entering the combined sewer network, SuDS can improve existing flood risk and water quality
- It is also important to consider now the measures called for in response to the climate crisis. Measures should support the attenuation of flows of surface water run-off from rainfall, as well as surface water infiltration into the ground wherever possible in the local environment. Retrofitting sustainable drainage solutions is challenging. By showing the way with new development we can reduce the implementation costs of these measures whilst securing truly sustainable development. Please see our policy statement on Sustainable Development here: <https://www.southernwater.co.uk/media/ny0nb3qu/our-policy-statement-on-sustainable-development-a4.pdf>
- Southern Water is working across our region to remove surface water from our networks in key areas. Even as we deliver this work, development continues to increase surface water run-off. For more information on our work, and the root causes of releases from storm overflows, please see – <https://www.southernwater.co.uk/our-performance/storm-overflows/storm-overflow-task-force> and https://www.southernwater.co.uk/media/7459/stormoverflows_faq.pdf).

3.5 SUSTAINABLE DEVELOPMENT

We propose the inclusion of water efficiency as a design code requirement, to be set out under the 'theme' of sustainable development.

As such, we propose the following as a code for inclusion.

- *All dwellings on new developments are to be constructed in accordance with the Building Regulations optional standard for water efficiency. This standard is already adopted within the Brighton & Hove City Plan (policy CP8) South Downs National Park Authority Local Plan (policy SD48).*

However, although the above is currently appropriate to the 'serious water stress'¹ status of the South East, the Government plans to tighten² this Building Regulations standard. High standards of water efficiency in new developments also equate to greater long-term sustainability.

We would therefore ideally like to see tighter water efficiency targets in keeping with Southern Water's 'Save a Little Water' programme to consume no more than 100 litres per person per day across our region.

¹ [Water stressed areas final classification 2021.odt \(live.com\)](#)

² <https://database.waterwise.org.uk/knowledge-base/building-regulations-water-efficiency-review/>
<https://www.gov.uk/government/news/ambitious-roadmap-for-a-cleaner-greener-country>

We make this recommendation because:

The South East region incorporates many environmentally sensitive areas and is classified as an area of 'serious water stress'. Significant challenges and environmental improvements need to be addressed, while at the same time enabling some of the highest rates of growth in the country. This together with the increasing impacts of climate change expected over time mean we need to significantly reduce our water use. Tackling water scarcity requires a multi-faceted approach and there is an opportunity for all levels of the planning system to play a part by ensuring policy requires new development to meet the highest standards of water efficiency possible.

Policy LCS1 – Local Community Spaces

We support this inclusion of policy promoting the protection of local community spaces; however, we request the following amendment to the current wording.

*These valued green and open spaces including those currently in use for Recreation, Playing Fields and Allotments will be retained for their appropriate community use until approved evidence shows they are no longer needed or **that the land is required for development under the very special circumstances set out within the National Planning Policy Framework.***

We make this recommendation because:

Southern Water is the statutory water supplier and wastewater undertaker for Coldean. As such, we are responsible for an infrastructure network across the area. Whilst we agree that Local Green Spaces should be preserved for the benefit of local communities, it is important to ensure that policy does not create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.

Although there are no current plans, sometimes there is a need for new, or upgrades to existing, infrastructure in areas where there may be limited options available with regard to location, as the infrastructure would need to connect into existing networks. The 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*'.

The National Planning Policy Framework (NPPF) (2023) establishes in paragraph 107 that Local Green Space policies should be consistent with those for Green Belts, and Paragraph 152 sets the intention of ruling out inappropriate development '*except in very special circumstances*'. Paragraph 153 explains that special circumstances exist if the potential harm of a development proposal is clearly outweighed by other considerations, whilst Paragraph 155 identifies that '*certain other forms of development are also not inappropriate*' in the Green Belt, including '*engineering operations*'.

Policy E3 – Protection of Green Spaces

We strongly support this inclusion of policy promoting the protection of Green Space; however, we request the following amendment to the current wording.

*Development that results in the loss of green spaces identified or that results in any harm to their character, setting, accessibility, appearance, general quality or amenity value would only be permitted **under very special circumstances***, or where the community would gain equivalent benefit from the provision of suitable replacement green space or gain significant social, economic, or environmental benefits from an alternative facility. The requirements for future developments should also comply with City Plan Policy CP16.*

We make this recommendation because:

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Policy E5 – Adapting to Climate Change

We strongly support this inclusion of policy promoting sustainable drainage.

(d) Adopt best practice in suitable urban drainage. The requirements for future developments should also comply with City Plan Policy DM4 and Brighton & Hove City Council's Sustainable Drainage SPD.

Policy E5 – Biodiversity Net Gain

We strongly support this inclusion of policy promoting the conservation and protection of water resources.

e) Implement measures to conserve and protect water resources, including the preservation of pollution, sustainable water use practices, and the preservation of watercourses crucial for the ecosystem.

In addition, for the reasons explained further below, we would like to see this policy go further and include the following wording in relation to water supply.

- *All dwellings on new developments are to be constructed in accordance with the Building Regulations optional standard for water efficiency. This standard is already adopted within the Brighton & Hove City Plan (policy CP8) South Downs National Park Authority Local Plan (policy SD48).*
- *Where developments are proposed in areas overlying Source Protection Zones (SPZ) applications must demonstrate how SuDS designs will protect groundwater quality sufficiently to protect public water supply. SuDS design should be agreed in consultation with the statutory water supplier, supported by results from a hydrogeological risk assessment of the site where required.*

We make this recommendation because:

The South East region incorporates many environmentally sensitive areas and is classified as an area of 'serious water stress'. Significant challenges and environmental improvements need to be addressed, while at the same time enabling some of the highest rates of growth in the country. This together with the increasing impacts of climate change expected over time mean we need to significantly reduce our water use. Tackling water scarcity requires a multi-faceted approach and there is an opportunity for all levels of the planning system to play a part by ensuring policy requires new development to meet the highest standards of water efficiency possible.

Southern Water mapping records indicate that Coldean overlies groundwater Source Protection Zones (SPZ). As drinking water standards are more stringent than the environmental standards more often referred to in SuDS guidance for the protection of groundwater, Southern Water has developed additional guidance for SuDS within SPZ - please see this link for more information <https://www.southernwater.co.uk/media/oooubtggs/suds-in-spz-guidance.pdf>. This guidance explains when we will ask developers to provide a full hydrogeological risk assessment of the site to inform their SuDS design proposals.

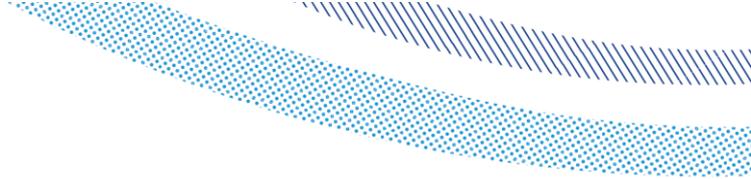
Southern Water has limited powers to influence the design of SuDS. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 180(e) of the revised National Planning Policy Framework (NPPF) (2023).

Proposed New Policy to support the provision of infrastructure

Southern Water may have to provide additional water or wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. Planning policies should therefore support infrastructure proposals and we therefore propose an additional policy for inclusion within the Plan:

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.

We could find no policies to support the general provision of new or improved utilities infrastructure in the current draft of the Plan. The NPPF (2023) 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 Neighbourhood Forum is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system

9. Do you have any general comments about the draft Coldean Neighbourhood Plan? (page and/ or paragraph references would be helpful please but aren't essential)

No

10. If you would like to receive updates about the Plan or then please provide your email address. We will not share this with any other organisations.

planning.policy@southernwater.co.uk

11. Do you wish to join as a Coldean Neighbourhood Planning Forum member? Membership of the Forum is free.

No