



Chichester District Council

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

Date  
29 May 2025

Contact  
[REDACTED]

Dear Sir/Madam,

**Chichester District Plan – Main Modifications Consultation - Schedule of Additional Modifications**

Thank you for consulting Southern Water on the Chichester Local Plan Main Modifications.

Southern Water is a Statutory Wastewater and Water Service Provider for the Chichester District.

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



# Chichester District Council Local Plan

## Main Modifications Consultation

### Southern Water Response

## Chapter 2: Vision and Strategic Objectives

Southern Water is a Statutory Water Service Provider for the Chichester District, as such we welcome and support the inclusion of water scarcity as a consideration in The Vision for the plan area.

*The Vision is that by 2039, the Chichester plan area will be a place where people can:*

- *Be confident that new development will be designed and located to mitigate and withstand climate change, taking account of factors such as sea level rise, high summer temperatures, **water scarcity** and the need to reduce greenhouse emissions from homes, businesses and travel;*

Water is a finite resource and one of the key issues facing our environment is fresh water scarcity. 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 the Local Plan has a key role in ensuring that new development is designed to be water efficient, to assist in reducing the impact of water scarcity.

## Chapter 4: Climate Change and the Natural Environment

Southern Water is a Statutory Water Service Provider for the Chichester District. We welcome and support the modification below to paragraph 4.31, to reflect that Sussex North Water Resource Zone is only partly served by groundwater abstracted near Pulborough.

### **Arun Valley SPA and SAC**

*4.31. The Arun Valley SPA, SAC and Ramsar site lies within the Sussex North Water Resource Zone which is **partly** served by supplies from groundwater abstraction at Pulborough. Natural England have advised that there is a significant threat to the Arun Valley SPA, SAC and Ramsar site arising from this groundwater abstraction, and that water neutrality is one way to ensure that no further adverse effect is produced, and for sufficient water to be available to the region.*

As advised in our Regulation 19 consultation response to the Local Plan, the groundwater abstraction supply is near rather than at Pulborough (consultation response wording set out below for reference).

*Paragraph 4.31 - adjustments to this paragraph are requested in order to ensure consistency, clarity and accuracy of the paragraph in relation to other references in the Chichester Local Plan to Southern Water's supply in the Sussex North Water Resource Zone, as follows;*

4.31 *The Arun Valley SPA, SAC and Ramsar site lies within the Sussex North Water Resource Zone which is **partly** served by supplies from groundwater abstractions at near Pulborough.*

We recommend that paragraph 4.31 is modified further to reflect our consultation response above, specifying that the groundwater abstraction supply is near rather than at Pulborough.

## **Water Supply and the efficient use of water:**

Southern Water is a Statutory Wastewater Service Provider for the Chichester District, we welcome and support the modified wording pertaining to the Southern Water Drainage and Wastewater Management Plan (DWMP). We recommend one small amendment, the DWMP was published in May 2023 rather than in June 2023. Please can this be amended in the paragraph set out below.

~~4.103. Southern Water is preparing a Drainage and Wastewater Management Plan (DWMP) for the Arun and Western Streams area which will consider the options and priorities for the conveyance and treatment of wastewater over the next 25 years. This includes considering the impacts of climate change and the potential need to relocate works affected by sea level rise in future. The DWMP has been used to inform the Local Plan and associated development strategy. Southern Water's Drainage and Wastewater Management Plan (DWMP) for the Arun and Western Streams is a 25 year plan that looks holistically at a range of issues in the catchment and strategic options for addressing them; such as pollution, combined sewer overflow performance, growth, water quality improvements, maintenance requirements, infiltration and sewer flooding. Chichester District Council officers have been fully engaged in the preparation of the DWMP which was published in June 2023, to ensure that proposals emerging in the Local Plan were taken into account. The DWMP feeds into OFWAT's Price Review process (PR24) which informs investment for the 2025-30 Asset Management Plan period (AMP8). DWMPs, which are now statutory, will be reviewed every 5 years to inform water company business plans for future AMP periods, allowing an iterative approach to planning for growth. More information is available on Southern Water's DWMP webpages.~~

## **Chapter 5: Housing**

5.1. The **local** Preferred Approach consultation on the Local Plan was based on meeting the identified objectively assessed housing needs of **for** the plan area **is** of 638 dwellings per annum(27) (dpa), **which is a starting point for determining the housing requirement. This excludes any** plus an allowance for accommodating unmet need arising from the Chichester District part of the South Downs National Park. **The plan period is from 2021/22 – 2038/39 giving a total requirement of a minimum of 11,484 dwellings. From the start of the plan period (1 April 2021) to 31 March 2024 there have been 2,326 completions, leaving a residual need of 9,158 dwellings to be delivered.**

As a Statutory Wastewater and Water Service Provider for the Chichester District, we welcome early engagement in relation to any increase in the number of dwellings to be delivered in the Local Plan.

'Made' Local Plans are a consideration for our investment plans to accommodate housing growth. Therefore, it is important that the projected number of dwellings to be delivered during the Local Plan period is understood and can be considered in relation to our infrastructure provisions.

As such, we welcome early engagement in relation to any additional housing allocations made through a Site Allocation DPD or review of the Local Plan.

## Chapter 10: Strategic and Area Based Policies

### Policy A10 Land at Maudlin Farm

Southern Water is the Statutory Wastewater Undertaker for Westhampnett.

We welcome and support the Modification below, which seeks to phase development aligned to the delivery of the required wastewater capacity to serve the number of dwellings proposed for the development.

***13. The development will need to be phased in such a manner to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements resulting from this development;***

However, the above wording implies that phasing the development will ensure sufficient disposal capacity, however it is the delivery of wastewater infrastructure that would ensure that wastewater capacity is available to serve the development.

It is also the phasing of occupation that is required, rather than phasing the development itself, as construction can continue, aligned to the delivery of infrastructure provisions, so long as occupation is timed to coincide with the delivery of wastewater capacity, as required.

In our Regulation 19 consultation response to the Local Plan, we advised the following for Policy A10 Land at Maudlin Farm.

*We have undertaken an assessment of the existing capacity of the wastewater network and its ability to meet the forecast demand for this proposal. The assessment reveals that the local sewerage network 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 up to 265 dwellings at this 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 to the developer, but Southern Water will need to work with site promoters to understand the development program 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 implemented in advance of occupation.

*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 170(e) of the National Planning Policy Framework (NPPF) (2021).*

*Having regard to the above, and for consistency with policies A6, A7, A8 and A14 given that wastewater arising from development within Westhampnett parish will be conveyed to Tangmere WTW, we propose the following additional criterion to site policy A10 (new text underlined):*

*Occupation of development will be phased to align with the delivery of infrastructure for adequate wastewater conveyance (meeting strict environmental standards).*

We maintain this recommended wording, underlined above, for Policy A10 Land at Maudlin Farm.