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## **Portsmouth Water**

### **Chichester Local Plan Review 2019-2035**

### **December 2018**

#### Spatial Vision

Portsmouth Water note that there are significant additional housing allocations to the west of Chichester and on the coastal strip. These sites will need to be assessed for water supply and funding included in the Infrastructure Charging scheme. (See Map 4.1 Key Diagram)

It is not clear what water storage capacity is being referred to in Section 3.19. Portsmouth Water will review the provision of Service Reservoirs, for day to day use, and has re-started development of a large raw water storage reservoir at Havant Thicket. The reservoir, when combined with Portsmouth Water's existing sources and enhancements to its groundwater sources, would create sufficient surplus to support an additional flexible daily transfer of treated water from Portsmouth Water to Southern Water without detriment to Portsmouth Water's resilience.

Southern Water requires this transfer to help meet a significant deficit in its Southampton East, Southampton West and Isle of Wight resource zones. This deficit arose after Southern Water agreed to reduce its abstraction licences on the Rivers Test and River Itchen at a public inquiry in March 2018, to help protect the environment.

It is not clear that the water demands of the Horticultural Development Areas have been assessed. It is possible that these businesses will rely on rainwater harvesting and storage but changes in licencing regulations mean that 'Trickle Irrigation' is no longer exempt from abstraction licencing. Groundwater abstraction in the coastal plain will require an impact assessment under the Habitats Regulations. (Section 4.75)

#### Spatial Strategy

Policy S12 sets out how development can make effective use of existing infrastructure. Portsmouth Water agree that the siting and timing of development can assist with the economic provision of water resource infrastructure. It also states that safeguarding existing infrastructure, such as water mains and aquifers, is important. Portsmouth Water would urge developers to check for existing infrastructure and for source protection zones that may limit development options.

Water infrastructure is not funded through CIL but a separate 'Infrastructure Charge' payable for each individual house. This is designed to pay for all off-site water infrastructure such as mains reinforcements, service reservoirs and supply. Development to an agreed program will help this system work effectively.

### Strategic Policies

Policy S27 'Flood Risk Management' refers to Sustainable Drainage Systems (SuDS) and the need to control surface water run-off. It should also refer to aquifer protection and the need for caution when using infiltration systems especially deep bore systems. This applies particularly when the site is in, or close to, a source protection zone.

Policy S31 'Wastewater Management and Water Quality' refers to higher standards in the Building Regulations for water consumption to reduce pollution in the harbours. Portsmouth Waters 'Water Resources Management Plan' is based on lower per capita consumption and we have an aspiration for all customer to reach 100 litres/head/day by 2050. This is no substitute for reducing overall flows to sewage treatment works by the control of groundwater infiltration and surface water drainage.

### Strategic Site Allocations

Policy AL1 'West of Chichester' does not mention water supply so we assume that the site has reverted to a conventional system with sewerage pumped to Tangmere WWTW and water supplied by us. Portsmouth Water has provided provisional designs for this system and there are no existing large diameter water mains on the site. Costs for reinforcement of the water mains will be recovered by the new Infrastructure Charge and on site mains are likely to be provided by a third party. Information on how reinforcement of the water mains is recovered by the Infrastructure Charge can be found in Portsmouth Water's Developer Charging Arrangements on our website under <https://www.portsmouthwater.co.uk/developers/>.

Policy AL2 'Shopwyke' is already under construction and has a conventional water supply system with all elements provided by us. Costs are being recovered via the Infrastructure Charge and on-site charges.

Policy AL3 'East of Chichester' is a new strategic site and there are no large diameter mains crossing it. This is an old landfill and may contain material that can damage plastic pipes. On site mains may need to be protected or be more expensive to ensure water quality is maintained.

Policy AL4 'Westhampnett' Phase 1 is already under construction and account has been taken of the large diameter main that crosses the site. Phase 2 is an extension of the existing Greylingwell site but it is not clear if this has been allowed for in the design of this 'Inset Appointment'. Portsmouth Water do not own the mains and there may be a single point of supply.

Policy AL5 'Southern Gateway' is an inner city development with a good water supply system. The reference to the 'efficient use of water' is confusing because many of the other strategic development sites also drain to Apuldram WWTW. All sites need to be water efficient but not follow the example of the 'Code for Sustainable Homes'. Sites were developed in Chichester that used rainwater harvesting to meet the Code objectives but were able to use higher water use fittings such as power showers. This led to properties producing more sewage than equivalent water efficient

homes. This did not achieve the objective at Apuldram. An alternative provision might be to reduce infiltration but it is not clear how this would be funded or who would carry out the work.

Policy AL6 'South West Chichester' is crossed by a large diameter main that will have to be reflected in the road layout or diverted. The proposed link road may offer an alternative route for the main.

Policy AL7 'Bosham' is situated on the old A27 and there are no large diameter mains in the area.

Policy AL8 'East Wittering' is at the extremity of the distribution system and may be expensive to supply.

Policy AL9 'Fishbourne' allocation is not site specific and it is difficult to comment on the feasibility of water supply. Any off site costs will be recovered via the new Infrastructure Charge. Portsmouth Water have public water supply abstractions in the area and development is likely to be located in a source protection zone for our Fishbourne public water supply abstraction. Under this policy, where development is in a source protection zone, the policy should also refer to groundwater quality protection and the additional requirements when using infiltration systems in particular deep bore systems. Further guidance on Portsmouth Water's preferred approach to development relating to groundwater quality within our catchments can be found within 'Portsmouth Water's Groundwater Protection Guidance notes' which are attached to this response and also available to view on our website under <https://www.portsmouthwater.co.uk/developers/groundwater-protection/>.

Policy AL10 'Chidham and Hambrook' is a large site and may need to be considered in combination with 'Southbourne' and 'Bosham'. There are no large diameter mains in the area and mains reinforcements may be required.

Policy AL11 'Hunston' allocation is not site specific.

Policy A12 'Selsey' is at the extremity of the distribution system and has seen previous housing growth. Reinforcement of the water mains may need to be provided.

Policy AL13 'Southbourne' is supplied from a different distribution system to Chichester. This is a very large housing allocation and this may need to be considered in combination with 'Hambrook' and 'Bosham'. There are sufficient water resources for all the housing allocated to Portsmouth Water's area of supply. It is the location of the housing site in relation to existing trunk mains and service reservoirs that determines the cost to supply. Local reinforcement of the water mains may be required.

Policy AL14 'Tangmere' housing allocation has increased by 30% and we may need to repeat the modelling that has already been done. There is also uncertainty about the water supply to the HDA which seems to rely on rainwater harvesting for future growth. The housing development and the HDA could have an impact on our source protection zone. Under this policy, where development is in a source protection zone, the policy should also refer to groundwater quality protection and the additional requirements when using infiltration systems in particular deep bore systems. Guidance should be sought from Portsmouth Water's Groundwater Protection Guidance for development.

Policy AL15 'Land at Chichester Business Park, Tangmere' Portsmouth Water have public water supply abstractions in the area and the site allocation is likely to be within a source protection zone for our Aldingbourne public water supply abstraction. As above, where development is in a source protection zone, the policy should also refer to groundwater quality protection and the need for caution when using infiltration systems in particular deep bore systems. Please refer to Portsmouth Water's Groundwater Protection Guidance for further information.

## Development Management

Policy DM10: 'New Employment Sites' Development proposal should be compatible with other policies in the Plan, in particular DM9 'Existing Employment Sites' to ensure that the development is otherwise acceptable. Policy DM9 states that development should 'not generate unacceptable levels of water pollution' and this should include groundwater pollution. This requirement should also be applied to Policy DM10, especially when the site is in, or close to, a source protection zone.

Policy DM15 'Horticultural Development' Developments at Tangmere HDA have relied on infiltration to dispose of excess surface water. This policy states that development should 'not generate unacceptable levels of water pollution' and this should include groundwater pollution. Portsmouth Water have public water supply abstractions in the area and the potential impacts must be assessed for any SUDS. The EA 'Abstraction Licencing Strategy' (ALS) may give an indication about the availability of groundwater but it does not cover the derogation of existing supplies.

Policy DM16 'Sustainable Design and Construction' covers the use of Building Regulations to control water use. Portsmouth Water have an aspiration to reduce overall water use to 100 litres/head/day and this policy will help to achieve that aim.

Policy DM18 'Water Management' using SUDS needs to take account groundwater quality and should avoid direct infiltration into the chalk aquifer. This is especially important within the source protection zones.

Policy DM29 'Biodiversity' Portsmouth Water has legal duties to protect and where practical enhance biodiversity and has an active program of work on it's own land. This work is now expanding to include projects on other people's land in association with 'Catchment Management' activities. We would look to CDC for support in areas such as Bosham Stream, Lavant Stream and Fishbourne Stream where schemes could be developed in partnership with local housing developments.

Policy DM35 'Equestrian Development' can have a direct impact on water quality including groundwater quality. Portsmouth Water support the protection of water courses and aquifers.

## Appendix 'E' Monitoring Framework

Policy S12 covers the provision of infrastructure but it is not clear how records of completed projects will be collected or stored.

Policy S26 covers biodiversity improvements and Natural England should be consulted on priorities and record keeping.

Policy S31 covers water consumption which is only available for the whole Company area in the WRMP Annual Review.

Portsmouth Water

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