



**Horsham
District
Council**

Representation Form

Itchingfield Neighbourhood Plan 2019-2031

The Neighbourhood Planning (General) Regulations 2012 (as amended) - Regulation 16

Itchingfield Neighbourhood Development Plan

Horsham District Council has reviewed its protocols regarding the consultation process for neighbourhood plans. In order to continue to progress neighbourhood plans, we have made a decision to continue with the consultation process with measures we feel are in accordance to the government guidelines.

Itchingfield Parish Council has prepared a Neighbourhood Development Plan (INP). The Plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. In accordance with Regulation 16 of the Neighbourhood Planning Regulations 2012 (as amended), the INP and associated documents will go out to consultation from:

5pm 17 December to midnight 11 February 2021 for 8 weeks inviting representations on the draft submission plan, basic conditions statement, consultation statement, Habitat Regulations Assessment and the full Strategic Environmental Assessment (SEA).

Copies of the INP Neighbourhood Plan and supporting documents are available to view on the Horsham District Council's website:

<https://www.horsham.gov.uk/planningpolicy/planning-policy/currentconsultations>

Documents will not be made available in deposit locations due to the current COVID-19 pandemic. If local residents have difficulty in engaging online we have provided a telephone number and email address below. Members of the public are encouraged to leave their details for an officer to contact them back if they need further information.

Email: neighbourhood.planning@horsham.gov.uk – SAS@southdowns.gov.uk

Telephone: 01403 215398

All comments must be received by Midnight on 11 February 2021

There are a number of ways to make your comments:

1. Please click on the weblink above to view the plan and support documents;
2. Complete this form and email it to: neighbourhood.planning@horsham.gov.uk ; or
3. Print this form and post it to: Neighbourhood Planning Officer, Horsham Council, Parkside, Chart Way, North Street, Horsham, RH12 1RL

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by Horsham District Council in line the Data Protection Act 1998 and General Data Protection Regulations. Horsham District Council will process your details in relation to this preparation of this

document only. For further information please see the Council's privacy policy: <https://www.horsham.gov.uk/privacy-policy>

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	
Address	Southern House, Lewes Road, Brighton
Postcode	BN1 9PY
Telephone	
Email	Planning.policy@southernwater.co.uk
Organisation (if applicable)	Southern Water
Position (if applicable)	Regional Planning Lead
Date	28 January 2021

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	AIM3: Infrastructure Provision
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support

Support with Modifications

Object

Comment

Please give details of your reasons for support/opposition, or make other comments here:

Southern Water is the statutory wastewater undertaker and water supplier for the parish of Itchingfield, and as such, is a statutory consultee on the neighbourhood plan. However we have no record of having been notified of Itchingfield Neighbourhood Plan's Regulation 14 consultation. Therefore some of our comments below which are mainly informative may have been more appropriately addressed to the Parish Council than the Examiner. Nonetheless we submit our comments as follows and make reference to the following paragraph in AIM 3:

'Developers are advised to engage in pre-application discussions with Southern Water to evaluate whether changes to the Hardham abstraction would have any impacts for the timing of delivery of their developments in order to keep pace with infrastructure.'

Whilst the Council will be aware of the Environment Agency and Natural England's concerns regarding Southern Water's abstraction at Hardham and its impact on the Arun Valley SPA and Pulborough Brooks SSSI, it should be noted that changes to the abstraction licence have not yet been made. Southern Water is currently focussed on investigating these concerns further in order to ensure that water supply abstraction is not causing an impact and is sustainable in the long term. This could mean taking less water from the Hardham groundwater source in future, but we do not anticipate any changes to our abstraction licence until the investigations are complete, which could take between three to five years.

We are working closely with our regulators on a way forward to ensure we have a sustainable source of supply at Hardham and to meet customers' supply needs whilst minimising impacts on the environment. In the long term we may need to develop alternative supplies funded by our five year business plan, which is informed by the Water Resources Management Plan (WRMP), and in the short term we are implementing an action plan to reduce the risk of needing to implement drought measures more frequently. Our short term action plan includes investing more in leakage reduction and water efficiency, providing more resilience to our assets so that outage is less of an issue, re-zoning supplies (ie sourcing supplies from other water treatment works and/or neighbouring water companies). There is an opportunity for the neighbourhood plan to support this by requiring new development to achieve Building Regulations higher water efficiency standards of 110 litres per person per day, which is appropriate across the water stressed south east.

As new developments are added to our network this has the potential to increase the demand for water and place pressure on our ability to maintain customers' service levels during water stressed periods. Given the issue which has emerged around our Hardham groundwater abstraction we are now actively working with our regulators to manage this risk in order to minimise the impact on customers and the environment. The current risk to customers' service levels does not imply we cannot accept new connections to our supply network – we are working on the assumption that these will continue in line with Local Plan housing growth forecasts and we will manage the risks as mentioned above.

What improvements or modifications would you suggest?

In order to reflect the situation as outlined above, and to support the delivery of sustainable development by minimising resource use, Southern Water would suggest the following modifications to AIM 3 (new text underlined):

New residential development should achieve higher Building Regulations water efficiency standards of 110l/p/d. Developers are advised to engage in pre-application discussions with Southern Water to evaluate water and wastewater infrastructure requirements, and whether any future changes to the Hardham abstraction would have any impacts for the timing of delivery of their developments in order to keep pace with infrastructure.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

Do you wish to be notified of the local planning authority's decision under Regulation 19 of the Neighbourhood Plan (General) Regulations 2012 in relation to the Itchingfield Neighbourhood Development plan?

Please tick here if you wish to be to be notified: