

Water Resource South East - Draft Best Value Regional Plan Consultation Response

1. Please tell us your name.

2. Please tell us your age.

3. Please tell us about your location (town or postcode)

Maidstone Borough

4. What organisation do you represent, if appropriate?

Maidstone Borough Council

5. Our draft regional plan looks 50 years ahead. It plans to increase resilience to drought and address the potential shortfall in water as a result of climate change, population growth and increased protection of the environment, by taking an adaptive planning approach.

Do you think the draft regional plan addresses the scale of the challenge we face in the future through our adaptive planning approach?

Strongly agree	
Agree	x
Neither agree or disagree	
Disagree	
Strongly disagree	

Please explain your answer.

Appendix 1: Maidstone Borough Council Responses to water supply consultations

The Council feels that the main variants that will cause the scale of the challenge for water supplies in the future have been correctly identified but would question some of the assumptions within the each of the variants.

Regarding population growth the Council agrees with the range of estimates for population growth given on page 13 of the consultation document. The range is comparable with its own latest estimates used for the development of the Local Plan Review outlined in the Strategic Housing Market Assessment (2021), which suggest an increase of 13.4% between 2019-2037.¹ However, the Council would ask whether the latest figures used take account of emerging Local Plans or only those that have been adopted? It is important to capture the latest evidence as some plans in the region are ageing with no or limited housing allocations left, as such a false impression of the levels of growth expected may have been captured. In a similar way predicting the future needs of other non- residential sectors will need to be assessed.

When looking at increasing resilience to drought the Council feels that improvements to technology and as such water efficiency should be factored in more.

Finally, the Council would like to question whether the post-Covid move to more remote home working has been factored into the calculations. Especially with regards to the impact felt on the changes to the residential and other sector forecasts.

6. Our draft regional plan has considered the needs of other sectors and how their demand for water could be met in the future. Do you support us continuing to work with other sectors so our regional plan fully embeds their future needs and includes appropriately-funded solutions to meet them?

Strongly agree	
Agree	x
Neither agree or disagree	
Disagree	
Strongly disagree	

Please explain your answer.

The Council supports this collaborative working approach. Within the Borough the Council through the Local Plan Review is planning for the development of a large employment areas that will see this sector grow, above that required in the forecasts. This is to ensure a healthy and resilient employment market through the provision of choice. The Council would wish to see this reflected in the understanding of need.

¹ Maidstone Strategic Housing Market Assessment (May 2021); p.41

- 7. The draft best value regional plan includes investment in new water supplies and activity to reduce the demand for water. The draft plan identifies that nearly 60% of the water needed by 2075 could come from demand management activities. This includes reducing leakage by at least 50%; extensive water efficiency through smart metering, customer behaviour change and new government policy; and the continued use of temporary restrictions on water use during periods of drought. The rest needs to come from a mix of new supplies. Do you think the draft regional plan strikes the right balance between reducing the demand for water and developing schemes to provide new water supplies?**

Strongly agree	
Agree	x
Neither agree or disagree	
Disagree	
Strongly disagree	

Please explain your answer.

The Council supports the overall approach taken in the consultation. The Council especially supports the development of new schemes to provide new water supplies to support growth. Within the Council’s own Maidstone Strategic Plan 2019-2045 it has a priority to support this: ‘Embracing Growth and Enabling Infrastructure’² This approach is supported by policies ID1 (Infrastructure Delivery) and DM 2 (Sustainable Design) of the adopted Local Plan 2011-2031 that seek to support the delivery of required water utility infrastructure to support growth and water efficiency measures in development respectfully.

Through the Local Plan Review the Council is seeking to update these policies to further the water efficiency of the built environment in the Borough. Specifically, it has developed a range of policies including: Policy LPRSP14(a) Natural Environment, LPRSP14(c) Climate Change, and Policy LPRQ&D 1 Sustainable Design.

- 8. The draft best value regional plan promotes increased collaboration between water companies in the development of new water sources and the construction of more transfers to move water around the region and share it between companies. Do you support the increased collaboration between the water companies in the South East and other regions, through the development of**

² Maidstone Strategic Plan 2019-2045 (2021 refresh), p.5

Appendix 1: Maidstone Borough Council Responses to water supply consultations

shared resources and an enhanced network to transfer water around the region and between regions?

Strongly agree	X
Agree	
Neither agree or disagree	
Disagree	
Strongly disagree	

Please explain your answer.

The Council does agree that increase collaboration between the water companies is a positive step, as long as the enhancement of this collaboration and water transfers across companies does not have a detrimental impact on the water supply service in the Borough.

9. If you have any other comments or feedback you would like to give us, please provide further details here.

The Council would like to raise several supplementary points with regards to water supply in the Borough and draw this to the attention of the WRSE. Firstly, it would like to raise concerns with regards to the level of service within the south of the Borough in relation to the villages of Staplehurst and Marden and the need for this to be improved. Secondly the Council has concerns as to the lack of weight attached to wastewater and supply issues in planning applications and Local Plans and that these should be given material weight in decision making. Lastly the Council has concerns that proposed infrastructure improvements take too long to implement and the funding system is too complex. It would like to see the system changed to allow for utility companies to receive developer contribution funding.

South East Water - Water Resource Management Plan Consultation Response

- 1. Alongside embedding the ambitious regional best value plan within our draft water resources management plan, we have also proposed an alternative plan for our supply area. This alternative plan brings forward two new supply schemes which would deliver additional resilience and water supplies during the next 50 years, as well as local benefits to customers, communities and the environment.**

Do you support our alternative plan?*

The Council is happy with the alternative plan proposed.

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- 2. Is there additional local information we should consider when creating our final water resources management plan?**

The Council has existing policies in its adopted Local Plan 2011-2031 that seeks to outline and management-built development in the Borough. Specifically, policies ID1 (Infrastructure Delivery) and DM 2 (Sustainable Design). South East Water may want to review these and factor in the impact that these may have of the demand forecasts and challenges planned for. These can be found in by using the following link: https://maidstone.gov.uk/_data/assets/pdf_file/0005/171149/Local-Plan-v2-November-2017.pdf

The Council is also reviewing the adopted Local Plan as is statutorily required through a Local Plan Review. This is seeking to update the policies and spatial strategy for the Borough. Presently the Council is at the examination stage with the intention to adopt the Local Plan Review by January 2024, subject to Government approval. Within the Local Plan Review several policies have been proposed to improve water efficiency; these include: Policy LPRSP14(a) Natural Environment, LPRSP14(c) Climate Change, and Policy LPRQ&D 1 Sustainable Design. South East Water may wish to review this document and factor it in to its planning work. The policies can be viewed by using the following link: [LPRSUB 001 Local Plan Review - Regulation 19.pdf - Google Drive](#)

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- 3. Are there any additional cost-effective benefits we should consider and include in the plan?**

Through the Local Plan Review the Council is seeking to update these policies to further the water efficiency of the built environment in the Borough. Specifically, it has developed a range of policies including Policy LPRSP14(a) Natural Environment, LPRSP14(c) Climate Change, and Policy LPRQ&D 1 Sustainable Design. It may be worth South East Water reviewing these proposed policies to see if they would have an

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- 4. Do you represent an organisation?***

Yes

5. If yes, which organisation do you represent? (If you are an individual please type 'individual')*

Maidstone Borough Council

6. Would you or your organisation be interested in collaborating with us to reduce water use?*

Yes

7. Are there any further comments you wish to make?

The Council would like to raise several supplementary points with regards to water supply in the Borough and draw this to the attention of South East Water. Firstly, it would like to raise concerns with regards to the level of service within the south of the Borough in relation to the villages of Staplehurst and Marden and the need for this to be improved. Secondly the Council has concerns as to the lack of weight attached to wastewater and supply issues in planning applications and Local Plans and that these should be given material weight in decision making. Lastly the Council has concerns that proposed infrastructure improvements take too long to implement and the funding system is too complex. It would like to see the system changed to allow for utility companies to receive developer contribution funding.

Southern Water – Water Resource Management Plan Consultation Response

Regional plans

1. Do you agree that our WRMP should reflect the best value regional plan, so we are aligned with our neighbouring water companies?

Yes	X
No	

Please explain your answer

Increasing resilience to drought

2. To protect the environment, we currently have a lower level of service in our Central area, covering West Sussex and Brighton and Hove, compared to our target. This means up to 2027 there is an increased likelihood of needing to impose restrictions on water use. We have set out our plan to address this gap. Do you have any comments or concerns about this level of service in our Central area and our plan to address it?

Yes	
No	x

Please explain your answer

The Council has no comments to make here.

3. We propose to stop using drought orders and permits that allow us to continue abstracting from the environment after 2040, unless we experience a severe drought. This means we'll need to develop new water supplies to replace them. Do you agree with this approach and the timescale we are proposing to deliver it?

Yes	X
No	

Please explain your answer

The Council is supportive of this aspiration as it will maintain the residents water supply.

Planning for an uncertain future

4. We have considered a range of future scenarios in our adaptive planning approach. Are there any other future scenarios that you think we should consider?

Appendix 1: Maidstone Borough Council Responses to water supply consultations

Yes	X
No	

Please explain your answer

The Council is in general agreement with the scenarios identified but does have a couple of points to make. The Council would ask whether the latest housing figures and population projections used take account of emerging Local Plans or only those that have been adopted? It is important to capture the latest evidence as some plans in the region are ageing with no or limited housing allocations left, as such a false impression of the levels of growth expected may have been captured. For example, the adopted Maidstone Local Plan 2011-2031 dates from 2017 and a new Local Plan Review is currently at examination with a government appointed inspector with the intention that it is adopted in January 2024. In a similar way predicting the future needs of other non- residential sectors will need to be assessed.

The Council would also question why there is not a scenario base on technological improvements and the influence that this may have.

Efficient use of water and minimal wastage across society

5. Do you support our plan to at least halve leakage by 2050?

Yes	X
No	

Please explain your answer

The Council supports the aim, but questions why it will take so long and asks if this target could be moved forward.

6. Do you support us achieving our WRMP target of reducing average personal daily use from 131 litres per person per day to a) 109 litres by 2040 or b) should we retain our more ambitious target of 100 litres per person per day by 2040?

A - 109 litres per person per day by 2040	X
B - 100 litres per person per day by 2040	

Please explain your answer

The Council supports the reduction of the personal daily usage to 109 litres. It aims to implement a water efficiency policy within the Local Plan Review (Policy LPRQ&D 1 Sustainable Design) which seeks new developments in the Borough to meet a standard of 110 litres per day.

7. Do you support additional proposed government interventions and the timing of their introduction?

Yes	X
No	

Please explain your answer

The Council has no comment to make here.

8. Our plan continues to rely upon temporary restrictions on water use to help lower demand during droughts to avoid further investment in new supplies. Do you agree with our approach to continue using temporary water restrictions during droughts?

Yes	
No	X

Please explain your answer

The Council does not agree with the use of temporary restrictions due to the inconvenience caused to residents as a result. The Council feels that the supply of water should be better managed and a greater role for water efficiency be followed to enable growth. To this end the Council has formulated policies in its Local Plan Review currently at examination to improve water efficiency.

[New water sources to provide resilient and sustainable supplies](#)

9. A new strategic reservoir is an integral part of the regional best value plan for the South East. Do you have any comments on the size of the new reservoir?

Yes	X
No	

Please explain your answer

The Council supports the development of a new strategic reservoir if it helps to maintain water supplies in the Borough.

10. Does your position change if the size of that reservoir (which will supply the transfer into Hampshire) impacts on the size of water recycling plant needed at Havant Thicket? (See section seven in our technical document for more information)

Yes	
No	X

Please explain your answer

Appendix 1: Maidstone Borough Council Responses to water supply consultations

The Council has no comment to make here.

11. Do you support our strategy to develop new pipelines that will transfer water into our supply area, that is made available through the development of new strategic water sources in other water companies' supply areas?

Yes	X
No	

Please explain your answer

The Council supports the development of a new pipelines if it helps to maintain water supplies in the Borough.

12. Do you agree that water recycling has a role to play in securing water supplies for the future?

Yes	X
No	

Please explain your answer

The Council supports the use of water recycling. Within the emerging Local Plan Review there is a policy LPRSP14(a) Natural Environment seeks new developments to guarantee water supply and minimise damage to groundwater sources. As such if water recycling projects can support this approach, then the Council supports this approach.

13. Our plan has shown we could need a desalination plant in Sussex by 2040 and that more could be needed in the future if we experience high population growth, and we need to reduce how much water we take from sensitive sources. Do you think we should use desalination to provide additional water supplies?

Yes	X
No	

Please explain your answer

The Council supports the development of new desalination plants if it helps to maintain water supplies in the Borough and does not cause major environment damage.

14. Our plan has identified the need for a new reservoir to store water in West Sussex. Do you think we should investigate this further to establish whether it could provide a new source for the area?

Yes	X
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No	
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Please explain your answer

The Council supports the development of a new strategic reservoir if it helps to maintain water supplies in the Borough.

15. Do you think we should look at water recycling options where water is stored in reservoirs, lakes or other waterbodies as well as those where it is released back into nearby rivers and abstracted again?

Yes	X
No	

Please explain your answer

The Council feels that greater water efficiency should be achieved, and this can be done through water recycling in order to minimise the impact on the environment and cope with being in an area of water stress.

16. Do you have any additional comments on any of the schemes we have proposed in our draft plan?

Yes	X
No	

Please explain your answer

The Council would like to understand where any proposed new reservoir supplying the Rochester supply works would be, and if it would be in Maidstone Borough.

[A network that can move water around the region](#)

17. Do you agree that we should develop our pipeline network so we can move more water between our supply areas and share supplies with our neighbouring water companies?

Yes	X
No	

Please explain your answer

The Council supports the development of a new pipelines if it helps to maintain water supplies in the Borough.

Catchment and nature-based solutions

18. Do you support our ambition to proactively use catchment and nature-based solutions where we can, to help improve the quality of the water sources we rely upon so we can abstract water sustainably and deliver wider environmental benefits?

Yes	X
No	

Please explain your answer

The Council supports nature and catchment based solutions. Within the emerging Local Plan Review there is a policy LPRSP14(a) Natural Environment seeks new developments to guarantee water supply and minimise damage to groundwater sources.

19. Do you think that others who benefit from a healthy water environment should contribute to the cost of delivering these solutions?

Yes	X
No	

Please explain your answer

The Council feels that national planning policy and guidance should be adjusted so that developer contributions, through S.106 agreements and the Community Infrastructure Levy, can be collected and provided to water companies to help mitigate the impact of development on water supplies.

20. Do you or your organisation have similar work planned in our catchments? Do you have any views on how best we can co-ordinate this work so we achieve the most benefits?

Yes	
No	

Please explain your answer

The Council has no comment to make here.

How we'll provide your water

21. Our draft WRMP includes options that will reduce demand and a mix of different schemes to produce extra water supplies. Do you think our plan strikes the right balance between demand and supply solutions?

Yes	X
No	

Please explain your answer

Appendix 1: Maidstone Borough Council Responses to water supply consultations

The Council supports the proposals outlined as long as they have factored most accurate growth figures for the Borough and any proposals would not lead to a degradation of water supplies to existing users in the Borough.
