

DRAFT for PUSH Programme Board
Friday 12 December 2008

PUSH Integrated Water Management Strategy

Appendix 1

Schedule of Consultants Recommendations and Proposed PUSH Responses

Section 1 – Water Supply

| Number | Consultants Recommendation | Reason for Consultants Recommendation | Recommended PUSH Response/Action |
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| 1 | No additional growth should be planned beyond that already proposed | Whilst viable solutions are potentially available to meet anticipated demands for water without posing unacceptable risks to the water environment, a range of issues will have to be resolved to secure implementation. A greater level of growth would create significant additional risk that water demand could not be met without harm to the water environment. | None. This recommendation accords with the position currently adopted by PUSH |
| 2 | PUSH should respond to consultations on the water | Implementation of the Strategy relies on the strategies and actions of the two water companies serving the area and it is incumbent on the PUSH authorities to take every opportunity to ensure that | Individual authorities may have responded to consultation on the water companies' draft WRMPs and draft Business Plans. Every opportunity should be taken by PUSH and its |

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| | company Water Resources Management Plans and on other related issues. | their plans will meet the needs of the sub-region. | constituent authorities to respond to future consultation on these plans and on related issues to ensure that they address the needs of the sub-region and meet the aspirations of the Integrated Water Management Strategy. |
| 3 | The Environment Agency and the water companies continue to explore the most cost-effective and sustainable solutions to the supply-demand deficit. | The unprecedented scale of the sustainability reductions required to safeguard the water environment require a coordinated response to understand the complexity of the issues, to examine the implications of potential actions and to secure action within the necessary timescales. | The Environment Agency and the water companies are in dialogue on these issues. PUSH should make efforts to ensure that productive cooperation is maintained and that the issues are addressed, perhaps through the suggested Water Supply Forum (4 below) |
| 4 | Creation of a PUSH Water Supply Forum | The establishment of a forum, meeting once or twice a year, would facilitate cooperation and regular communication between the PUSH authorities, the water companies and the EA and keep all parties informed of the pace of development, the implementation of new infrastructure and issues arising in connection with water supply and demand. | The potential value of such a forum is recognised. It is recommended that a Water Supply Forum for south Hampshire be established as suggested but PUSH should explore whether the need may be met within the existing Hampshire Water Partnership rather than by the establishment of a new grouping. |
| 5 | Continue to drive the sustainable housing agenda | Whilst any reduction in the per capita use of water is ultimately dependent on behavioural change, creating conditions that facilitate and support such | Although the benefits of encouraging the more sustainable use of water may not be immediate or tangible, PUSH and the individual planning |

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| | | change is vital. Driving the sustainable housing agenda will both reinforce the message and facilitate water efficiency and thereby ease the supply-demand deficit. | authorities must continue to press for increased water efficiency in new development as part of the drive for more environmentally sustainable development and by supporting the retrofitting of existing development. |
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Section 2 – Wastewater Management

| Number | Consultants Recommendation | Reason for Consultants Recommendation | Recommended PUSH Response/Action |
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| 6 | No additional growth should be planned beyond that already proposed. | Whilst the report concludes that the proposed level of growth can be accommodated in a sustainable manner, there are uncertainties around environmental capacity, treatment capability and current and future discharge volumes that must be tested and assumptions verified. A greater level of growth would create significant additional risks. | None. This recommendation accords with the position currently adopted by PUSH |
| 7 | Planning requirements for additional infrastructure should be | The study has concluded that no new wastewater treatment plants will be required. However, several works will require significant upgrading and Southern Water and the relevant local authorities should discuss the land and planning | Individual PUSH authorities should address issues in relation to works within their area in discussion with Southern Water. The suggested Water Supply Forum (4 above), as a Water Resources Forum, could monitor |

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| | clarified. | requirements for this work to ensure that it is feasible within the necessary timescales. | progress. |
| 8 | The forecasting approach used in the strategy should be verified by Southern Water and the EA. | The approach taken in this strategy to forecasting wastewater volumes has not been agreed by Southern Water and the EA but the issue is critical to the conclusions of the strategy. It is vital that agreement is reached at an early date on the forecasting methodology. | This is a matter for Southern Water and the EA that should be monitored by the suggested Water Resources Forum (7 above). |
| 9 | The monitoring of wastewater flows should be improved. | The monitoring of wastewater flow and treatment works' performance is not sufficiently robust, particularly at the Peel Common works, to provide a sound basis for estimating future capacity. | This is a matter for Southern Water and the EA that should be monitored by the suggested Water Resources Forum (7 above). |
| 10 | Efforts should be made to identify where reductions in sewer infiltration may be most viable. | The apparent scale of surface water infiltration into the foul sewer system justifies efforts to identify the increased works capacity that might be available if infiltration could be reduced and to consider the infrastructure work necessary to address the problem. A joint PUSH/Southern Water/EA study is suggested. | Further work on this issue appears to be justified. It would appear to be a matter for Southern Water and the EA and not work to which PUSH should contribute. Progress should be monitored by the suggested Water Resources Forum. |
| 11 | Efforts should be made to identify the benefits of securing reductions in | Diffuse pollution, particularly by phosphates in the River Itchen, is a significant cause of concern to the EA. An examination of the problem at a more local scale and of the potential for addressing the issue could provide the means for releasing more | Further work on this issue would appear to be justified. Whilst primarily a matter for the EA, a PUSH contribution to a study could be warranted. The matter should be discussed further within the suggested Water Resources |

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| | diffuse pollution and the locations where this would be most beneficial. | treatment capacity in wastewater treatment works. A joint PUSH/Southern Water/EA study is suggested. | Forum. |
| 12 | The implications of the forthcoming Water Framework Directive should be examined. | The EA have commissioned work to examine the implications of the Water Framework Directive on effluent discharge quality at a number of works. Results are awaited. Further work may be necessary as the implications of the Directive become clearer. | The suggested Water Resources Forum would be well placed to consider this issue further when the results of present studies become available. |

Section 3 – Flood Risk Management

| Number | Consultants Recommendation | Reason for Consultants Recommendation | Recommended PUSH Response/Action |
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| 13 | Avoid further development in flood risk areas. | The consultants recognise the need for a balance to be found between safety from potential flood risk and the economic and regeneration objectives of PUSH. They note, however, that planning for new development in areas at risk of flooding, even when these areas are protected by new sea | The South East Plan sets a focus on regenerating the cities and urban areas of south Hampshire. PPS25 seeks to steer development away from flood risk areas where possible and where development is needed in such areas, seeks that it is made safe. The |

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| | | defences, is not the most effective way of managing flood risk. | relevant PUSH authorities are in negotiation with the EA and Government on the need for development in areas at risk of flooding and no further action is required on this issue at present. |
| 14 | Improved planning for development in flood risk areas. | If development is to take place in areas at risk of flooding it is considered vital that efforts are made, in consultation with the EA, to ensure that risks to health and safety are minimised through appropriate forward planning. | The relevant PUSH authorities are in negotiation with the EA and Government to address these issues and no further action is required at present (13 above). |
| 15 | Ensure that existing communities are satisfactorily protected from flooding. | In order to minimise the risk of flooding of existing communities, the PUSH authorities should work with the EA to review the effectiveness of existing flood risk management measures to the existing Standard of Protection. | Individual PUSH authorities should work with the EA on an analysis of risks and of necessary remedial measures. |
| 16 | Seek to increase the Standard of Protection for new and existing communities. | The consultants consider that the reliance of the PUSH strategy on existing and proposed development in the coastal flood plain justifies efforts in conjunction with the EA to enhance the Standard of Protection afforded to these areas. | Individual PUSH authorities should work closely with the EA and grasp opportunities to enhance the protection of the sub-region against flooding. |
| 17 | Review and update the SFRA. | The SFRA and the IWMS are both snapshots of the existing situation and projections for the future that will need to be reviewed to maintain an up to date picture of flood risks. | PUSH will need to consider the process and timetable for updating the SFRA and IWMS as part of any review of the South East Plan or in response to other changes in the water |

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| | | | environment. |
| 18 | Establish a recording and monitoring strategy for surface water flooding and develop surface water and groundwater management plans as an effective response. | There is currently no coordinated mechanism for recording and analysing surface and groundwater flooding and responses to the risks are therefore ad hoc. Climate change could increase the associated flood risks. The Government has suggested that surface water management plans be prepared to address the issues and the consultants suggest that the PUSH authorities, in conjunction with the EA, take the lead on these plans and on related groundwater management plans. | The PUSH authorities should work together to establish a recording and monitoring strategy to capture the nature, location, cause and extent of future surface and groundwater flood events and consider the preparation of surface and groundwater management plans. |
| 19 | Review critical infrastructure at risk of flooding. | The 2007 floods drew attention to the vulnerability of critical infrastructure to flood events. Many agencies are now reviewing the risks to their own infrastructure and the consultants suggest that the PUSH authorities consider adopting a coordinating role in this work. | The PUSH authorities, perhaps through their emergency planning role, should consider coordinating assessments of the risk to critical infrastructure from flooding on a sub-regional basis. |

Section 4 – Planning and Water Management

| Number | Consultants Recommendation | Reason for Consultants Recommendation | Recommended PUSH Response/Action |
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| 20 | Lobbying and responding to consultations. | Numerous future consultations on various matters affecting the water environment are anticipated. This report shows the critical nature of water supply and wastewater disposal issues to the quality of that environment and the consultants consider it vital that the PUSH authorities take every opportunity to influence the outcome of those consultations if the PUSH strategy is to be implemented and the environmental quality of the sub-region enhanced. | The PUSH authorities, individually and collectively, should respond effectively to consultations on matters affecting the water environment and take every opportunity to lobby the responsible bodies on related issues. |
| 21 | Developing coordinated sub-regional policies and guidance. | PUSH has a clear role and a successful track record in joint working on research studies and in policy development. The consultants suggest that this should be maintained and enhanced in further sub-regional policy and good practice guidance – possible policies are suggested. | The PUSH authorities must continue to work together on sub-regional research and on the preparation of policy and good practice guidance on water efficiency and demand management measures, surface water management and SUDS, environmental safeguarding and infrastructure provision. Consideration should be given to the policies suggested. |
| 22 | LDF preparation addresses water | Because of the cross boundary nature of issues associated with the water environment and their | The PUSH authorities must each ensure that their LDFs address the issues identified in the |

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| | issues. | importance to the PUSH strategy the consultants consider it critical that the authorities' LDFs address these issues in a consistent and coordinated way. | IWMS in a consistent and coordinated way. The suggested Water Resources Forum (7 above) could facilitate the necessary coordination. |
| 23 | The determination of planning applications should have greater regard to water management issues. | The consultants consider that the significance of water management issues for the success of the PUSH strategy overall necessitates greater regard to these issues in the consideration of individual planning applications. In particular, increased consultation with the water companies and the EA is advised and a consultee role on significant development proposals is suggested for PUSH in order to promote sustainable water management. | It is not currently the function of PUSH and nor does it have the resources to adopt a role as a consultee or as a monitoring body in relation to water management issues on individual development proposals. The preferred role for PUSH is to promote sustainable water management through appropriate research, liaison, coordination and policy guidance. |
| 24 | Increased working with partners. | PUSH is considered to be in a unique position to coordinate and strengthen partnership working among the plethora of bodies with interests in the water environment and the consultants suggest a number of initiatives that PUSH might pursue. | With the limited resources available to PUSH care must be taken to avoid adding a further layer of administration in these areas. It may be possible to enhance the effectiveness of partnership working through the involvement of PUSH in a coordinating role and the suggested Water Resources Forum (7 above) may be the best starting point for this. |
| 25 | Funding infrastructure provision. | The consultants suggest roles for PUSH in securing the provision of water management infrastructure in its widest sense through the proposed Community Infrastructure Levy and through forward-funding mechanisms to ensure | PUSH will need to examine the justification for securing funding for essential works by the water companies but will undoubtedly have a role in coordinating the identification of and need for a wide range of sub-regional |

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| | | that development is not delayed by the absence of essential infrastructure. | infrastructure and work has begun on these issues. This may include various elements of water management infrastructure, perhaps most significantly associated with flood risk management. |
| 26 | Further targeted research. | The implementation of the PUSH strategy will undoubtedly require further research in the fast-changing water management environment. | The PUSH authorities have an excellent track record in coordinating research necessary to the testing and implementation of the sub-regional strategy and this will continue. |

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