



Partnership for Urban South Hampshire (PUSH)
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Dear whom it may concern,

RE: Portsmouth Water ‘Draft Water Resources Management Plan’ consultation

The Partnership for Urban South Hampshire (PUSH) is a longstanding group of Local Authorities working together to support the sustainable economic growth of the sub region and to facilitate the strategic planning functions to support that growth. The partnership welcomes the opportunity to respond to the Portsmouth Water Resources Management Plan as part of the current consultation.

PUSH is a partnership of Hampshire County Council, the unitary authorities of Portsmouth, Southampton and the Isle of Wight, and the district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, New Forest, Test Valley and Winchester. Our response is outlined below.

Water Supply

We welcome the robust approach taken to ensure future water supply with the aim of reducing drought risk. We also welcome the long-term timeframe of the document stretching to 2045, which extends beyond the period of existing and emerging Local Plans in the PUSH region.

It is particularly noted that one of the key proposals is for a new reservoir at Havant Thicket (Havant Borough and East Hampshire District). This is welcomed with regards to ensuring future security of water supply in the region. However, we would welcome clarification on whether the proposed route of the pipeline (to supply neighbouring Southern Water areas) would have any safeguarding of land implications. If appropriate, these should ideally be reflected in emerging and future Local Plans so early discussion with affected Local Authorities is encouraged.

Water Use/Water Efficiency

We consider there is scope for the document to be more ambitious on overall water use as explained further below.

It is noted that water efficiency activities will help to reduce daily water consumption from 140 to 132 litres per person by 2045 – meaning that Portsmouth Water will

need to find less water to meet the demands of climate change and housing growth. Clarity is sought on whether this relates only to housing or also to a range of non-domestic uses. This will be welcomed in context of employment land targets and other non-residential land uses in those authorities where Portsmouth Water operates.

In addition, whilst this anticipated reduction to 132 litres water per person by 2045 is welcomed, it is important to consider that further reductions can be achieved. While we recognise the water resources in the Portsmouth Water area, we are aware that other local water companies are setting more ambitious targets around this. To put this into context, it is understood that Southern Water's Target 100 strategy aims to reduce daily water consumption (excluding external water use) to 100 litres per person per day by 2040. With the two water companies working together ever more closely, it will be important to further consider how Portsmouth Water can contribute towards additional water use savings. This is particularly important when considering parts of the region are in an area of serious water stress. In addition, Part G of the Building Regulations refers to a requirement of no more than 125 litres/person/day of wholesome water or 110 litres/person/day where the optional requirement applies.

It is also worth noting that lower maximum water usage targets for water are one of the less challenging sustainability measures in terms of impacts upon viability that developers can factor into their developments. Therefore, it is suggested that the anticipated reduction figure is both revisited and considered as a long-term target.

Other Matters

It is suggested that Portsmouth Water considers adding a reference to working with Local Planning Authorities to ensure water efficiency policies are included in emerging local plans. This would be reflective of the Draft NPPF which states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply along with other matters (Paragraph 148).

Reference should also be made in the document to working with landowners including farmers and industrial operators so that the quality of water is maintained and harmful effects of surface water run-off minimised. This will be particularly important considering water pollution is one of the biggest threats to the quality of our water supply. In particular, the PUSH Integrated Water Management Study (currently confidential) makes reference to catchment level nitrate problems within Fareham Borough as well as within other parts of the sub-region.

It would also be helpful if the plan was to make reference to the use of recycled wastewater from Southern Waters' operations particularly for commercial and industrial purposes. This opportunity should be fully set out in the document as a longer-term objective.

Finally, it would be helpful if the Resources Management Plan provides an indication of costs and how it is anticipated the noted projects will be funded, particularly for significant infrastructure items. This will help to provide certainty to both bill payers, local authorities and developers. As one example, if developers are required to fund these future proposals, the Government's proposed Strategic Infrastructure Tariff (if introduced) could be used as a mechanism but there may be viability considerations that will need to be considered and discussed.

We trust that this response is useful. PUSH would welcome further discussion on any related matters and/or discussions with those individual authorities impacted by specific proposals.

Yours sincerely,

A solid black rectangular box used to redact the signature of Claire Upton-Brown.

Claire Upton-Brown
Assistant Director of City Development &
Chair of PUSH Planning Officers Group