

IDP feedback provided for the Regulation 18 consultation deadline 23<sup>rd</sup> July 2024

### **Paragraph 7.3, page 221 - Comments on the Infrastructure Delivery Plan (IDP)**

Paragraph 7.3 of page 221 of the current draft of the Rother Local Plan states:

*“Through this public consultation we will be seeking the views of infrastructure providers on the impacts of our development strategy on the infrastructure needs for the district.”*

Paragraph 1.5 of the IDP states further:

*“Rother District Council welcomes feedback and commentary from infrastructure providers on the impacts of the proposed development strategy, these comments can be provided through the consultation on the draft Local Plan.”*

Southern Water has not previously had sight of the draft IDP and having now reviewed the content, we request the changes below, explaining our reasoning further below. For your ease of reference, we summarise our concerns as follows:

- **All water companies now await Ofwat’s final determination for 5-yearly business plans. Once published, we will be in a position to confirm strategic infrastructure delivery (as it is planned through this process). Outcomes from the DWMP process, that Rother DC was consulted on, have now fed into the plans we submitted to Ofwat for consideration. As we await final determination, our strategic infrastructure investment plans are not included within the IDP.**
- As the current Regulation 18 consultation draft of the Local Plan also contains no new site allocations, we cannot comment further at this time on ‘the impacts of Rother development strategy on infrastructure needs for the district’ (ref. paragraph 7.3 page 221 of the draft Plan).
- **In light of the above two points, we would recommend closer engagement over the content of the IDP, where at all possible to include a review of the IDP Schedule ahead of the next consultation stage for the Local Plan with a focus on local or strategic infrastructure needed to support the Local Plan (please see more detailed explanation below for our requested changes).**
- Also, the IDP Schedule does not yet show where the more innovative multi-functional design aims possible for green infrastructure might be incorporated, to reduce the causes and impacts of flooding in line with paragraph 167(c) of the NPPF (2023).

#### **Requested changes:**

The DWMP consultation process engaged with Local Authorities at a number of stages from the methodologies adopted through to the outputs that subsequently fed into the 5-year business planning process. As stated above, we await the final determination of our business plan from the water industry regulator Ofwat. We therefore highlight that the following entries within the IDP Schedule may be subject to change, or removal from the IDP Schedule where they do not represent capital investment for local or strategic infrastructure needed to support the Local Plan:

- UTI010, UTI011, UTI012, UTI013, UTI014, UTI015, UTI016, UTI017, UTI018, UTI019, UTI020, UTI021, UTI022, UTI023, UTI024, UTI025, UTI026

Additionally, the following entries could be updated as follows:

- UTI007 – as network reinforcement is generally to service one development, this is understood to be Local Infrastructure, rather than Strategic, and as such should be listed as Developer funded within the IDP Schedule (not part-funded through the capital programme). As delivery is underway, this scheme presents “Low” delivery risk if that could also be changed. Funding for all interventions is above £2m, but awaits final business plan confirmation – please see the links to further information where this is of help:

[https://experience.arcgis.com/experience/09b43c8b9ebd4edb954f9da099405558/page/Page/#data\\_s=id%3AdataSource\\_1-1882e4bc911-layer-30%3A19039](https://experience.arcgis.com/experience/09b43c8b9ebd4edb954f9da099405558/page/Page/#data_s=id%3AdataSource_1-1882e4bc911-layer-30%3A19039)  
<https://www.southernwater.co.uk/our-region/clean-rivers-and-seas-task-force/pathfinders/fairlight-east-sussex/>

#### Further explanation:

As explained in our feedback to the draft Strategic Infrastructure Policy INF1, statutory water companies must undertake a series of checks and then plan investment to accommodate growth in line with water industry funding routes and cycles. Upgrades are planned, delivered and funded through two main mechanisms – one relates to ‘network’ capacity, the other to wastewater treatment process (quality and capacity).

Any upgrades (reinforcements) that are needed on the network, specifically to accommodate new development, are funded through the new infrastructure charge to developers -

<https://www.southernwater.co.uk/building-and-developing/our-services/water-services/connecting-charging-arrangements/>.

Such upgrades are the responsibility of the statutory wastewater undertaker to plan and deliver once a planning application is granted as it is normally to serve that one development – which therefore meets the definition of local infrastructure needs.

Wastewater Treatment Works (WTWs) treat wastewater collected from homes and businesses within their ‘catchment’ via a network of connecting pipes and pumping stations. WTWs are significant assets and represent strategic infrastructure. Upgrades to WTWs are funded through the water industry’s 5 yearly investment plan which sets out spending requirements over the next 5 year period (AMP) using customer generated income.

We hope the above explanation helps to define the areas of Southern Water infrastructure delivery and investment plans that would be most relevant to include within the IDP Schedule.

The central purpose of Drainage and Wastewater Management Plans (DWMPs) is to plan for future climates and population while reducing storm overflows, flooding and pollution for the benefit of customers, communities and businesses and to protect and improve the water environment. Although many of these factors relate to growth and local planning for this, a number of outcomes relate to operational interventions to improve areas of performance, at times mitigating the impacts of behaviours as well as those of our changing climate.

The DWMP process involved extensive consultation that included local authorities and the Environment Agency amongst others. The outcomes\* of the DWMP process were concluded and fed into investment proposals submitted for Ofwat approval as part of our 5-yearly draft business plans.

\*For outcomes of DWMP consultation for relevant wastewater catchments, please see:

[https://www.southernwater.co.uk/media/hk1dkpwg/l3\\_fair.pdf](https://www.southernwater.co.uk/media/hk1dkpwg/l3_fair.pdf)  
[https://www.southernwater.co.uk/media/4h4em53p/l3\\_ryew.pdf](https://www.southernwater.co.uk/media/4h4em53p/l3_ryew.pdf) and  
[https://www.southernwater.co.uk/media/u5hm2kf0/l3\\_habx.pdf](https://www.southernwater.co.uk/media/u5hm2kf0/l3_habx.pdf)