



Your ref

By email to SHBNDP@gmail.com

Our ref

Date
23rd January 2025

Dear Sir/Madam,

Southborough and High Brooms Neighbourhood Plan Public Consultation

We have reviewed the submission draft Neighbourhood Plan with great interest and welcome the opportunity to comment.

Southern Water is the statutory wastewater undertaker for your neighbourhood. Although we do not supply water to the area, we have also responded to some of the water efficiency content in the current draft of the Plan and hope that you find this helpful.

Please let me know should you have any queries on our response, and we look forward to being kept informed of progress with the Plan.

Yours faithfully,

Catherine Adamson

Catherine Adamson
Strategic Planning Lead for Kent and East Sussex

Policy SHB4 Energy Efficiency and Design

Southern Water supports grey water recycling technologies and as explained further below, we would encourage additional content on sustainable urban drainage solutions (SuDS) as part of design considerations. Whilst we also support policies in favour of water efficiency, please could amendments be made to the plan to help its readers understand that Southern Water is not the statutory water supplier to Southborough and High Brooms? For example, paragraph 6.19 of the draft Plan refers to Southern Water's business plan but nowhere else does it state the statutory water supplier for Southborough and High Brooms.

Also, should this additional information be of help to you, for policy including water efficiency targets you will need to refer to:

- The Tunbridge Wells Local Plan policy on water efficiency – which for the submission draft of the evolving local plan (the SLP) is policy EN24.
- The Building Regulations optional standard for water efficiency in water stressed areas – that policy EN24 of the SLP will base its target of 110 litres per person per day target on.

Further explanation and suggestions for SuDS:

One of the benefits of rainwater harvesting and grey water recycling technologies is that they reduce surface water run-off in addition to reducing reliance on drinking water resources. Southern Water strongly supports requirements that seek to ensure surface water is appropriately managed as close to source as possible (and we note the reference to surface water run-off made in draft Plan policy SHB15). Design measures encouraged by part B of policy SHB4 should ideally support the attenuation of flows of surface water run-off from rainfall, as well as surface water infiltration into the ground wherever possible in the local environment. Several policies in the SLP refer to SuDS (in particular EN26) but should you wish to encourage sustainable development that considers all impacts of climate change within the neighbourhood development plan, we suggest adding the following to part B of policy SHB4:

Give priority to the use of sustainable urban drainage systems (SuDS) unless there is clear evidence that this would be inappropriate.

Support for green infrastructure is important to help reduce the rate of urban creep and support the natural water cycle. In addition to enhancing biodiversity, green areas can help to reduce the rainwater runoff that can contribute to flooding – both as green roofs that act to slow the flow of runoff from rainfall, and infiltration SuDS in appropriate locations. This is also in line with several paragraphs of the National Planning Policy Framework (December 2024) including paragraph 172(c) that requires:

using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management).

Climate change is expected to have an impact on the risk of flooding in several wastewater systems, including the Tunbridge Wells North catchment. Innovative green infrastructure design solutions can offer both sustainable drainage and urban cooling benefits – reflecting the benefits of trees and woodland described in paragraph 8.7 of the draft Plan. Preventing surface water from entering the foul and combined systems during heavy rainfall is also the most sustainable and cost-effective way to reduce storm overflows. Southern Water is investing heavily in work to reduce releases in part by removing existing connections of surface water to the combined and foul networks. However, even as we deliver this work, development continues to increase surface water run-off in those areas. For more information on Southern Water's work, and the root causes of releases from storm overflows, please see –

<https://www.southernwater.co.uk/our-region/clean-rivers-and-seas-task-force/pathfinders/>

<https://www.southernwater.co.uk/our-performance/storm-overflows/storm-overflow-task-force>
Policy SHB10 Local Green Spaces

Whilst we note that policy SHB1, the Location of Development, allows for '*necessary utilities infrastructure where no reasonable alternative location is available*', policy SHB10 does not make this clear for local green spaces.

Further explanation and recommendations:

We suggest adding the following wording to policy SHB10 to indicate how Local Green Space will be protected:

The areas listed below (and identified in maps..) are designated Local Green Space where inappropriate new development will not be allowed except in very special circumstances:

The National Planning Policy Framework (NPPF) (December 2024) sets out the intention to protect the countryside and prevent settlement coalescence through its Green Belt policies, for which it establishes:

- The intention in paragraph 153 of ruling out inappropriate development 'except in very special circumstances' that exist if the potential harm of a development proposal is clearly outweighed by other considerations.
- In paragraph 154 that 'certain other forms of development are also not inappropriate' including 'engineering operations'.
- Also in paragraph 108 of the NPPF that Local Green Space policies should be consistent with those for Green Belts.

Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential water or wastewater infrastructure (e.g a new pumping station) required to serve new and existing customers. This is because there can be limited options available with regard to location, as the infrastructure would need to connect into existing networks. The draft National Planning Practice Guidance recognises this scenario and states that '*it is important to recognise that water and wastewater infrastructure can have specific locational needs (and often consists of engineering works rather than new buildings). This means exceptionally otherwise protected areas may have to be considered, where this is consistent with their designation.*'