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Havant Borough Council

By Email Only - policy.design@havant.gov.uk

Date
1 September 2026

Contact
planning.policy@southernwater.co.uk

Dear Sir/Madam,

Havant Borough Local Plan - Building a Better Future – Regulation 19 Consultation

Thank you for consulting Southern Water on the Havant Borough - Building a Better Future - Plan Consultation.

Southern Water is a Statutory Wastewater Service Provider for the Havant Borough.

Please find further below our comments in respect of the Plan.

We hope that you find our response useful and look forward to being kept informed of progress.

Yours sincerely,

[redacted]

Ryan Lownds
Strategic Planning Lead
Hampshire, West Sussex & Isle of Wight

Havant Borough Council Local Plan

Building a Better Future

Reg 19 Consultation

Southern Water Response

Housing Allocations

Southern Water is the Statutory Wastewater Undertaker for the Havant Borough.

In accordance with this, we undertook an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for the proposed number of dwellings at each site allocation for the Reg18 Consultation.

We also assessed the location of our infrastructure in relation to each site.

Thank you for including the following Policy Requirements in the Local Plan, where applicable.

Occupation of development may be required to be phased to align with the delivery of sewerage infrastructure, if required, in consultation with the service provider.

Layout of the development must be planned to ensure future access to existing underground water company infrastructure for maintenance and upsizing purposes.

A 15 metre gap between the wastewater pumping station at the boundary of the site and any sensitive development (such as housing) should be taken into consideration in the site layout.

Allocation 3: Land south of Havant Road (Horse's Field)

We noted that the additional site of Allocation 3: Land south of Havant Road (Horse's Field) has been allocated in the Local Plan for this Reg 19 consultation, and we have undertook an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for the proposed number of dwellings at this site.

The assessment revealed that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.

Proposals for the number of dwellings at each site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development programme and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an **increased risk of flooding,** unless the requisite works are aligned with the occupation of the dwellings.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does

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not contribute to pollution of the environment, in line with paragraph 187(e) of the revised National Planning Policy Framework (NPPF) (December 2024).

Recommendation

Therefore, we recommend the following Allocation Requirement for **Allocation 3: Land south of Havant Road (Horse's Field).**

Occupation of development may be required to be phased to align with the delivery of sewerage infrastructure, if required, in consultation with the service provider.

Policy 55: Protecting Open Space

Draft Policy 55: Protecting Open Space states that development on open space will only be permitted where:
"a) The proposal retains or enhances the quality, quantity and accessibility of the existing open space;
b) The development is in the public interest and the benefits demonstrably outweighs the need for the protection of the open space; and
c) Alternative open space provision is made which is of equivalent or greater community benefit in terms of quality, quantity and/or, accessibility."

Southern Water understands the desire to protect countryside areas and open spaces. However, the current wording of the policy could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.

In terms of the delivery of new water or wastewater infrastructure (e.g. a new pumping station), there may be limited options available for its location due to the need to connect into the existing sewerage network.

The National Planning Policy Framework (NPPF) (2024) advises in Paragraph 108 that -

"Policies and decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts set out in chapter 13 of this Framework".

Paragraph 153 of Chapter 13 (Protecting Green Belt land) advises -

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

With Paragraph 154 advising the following -

Development in the Green Belt is inappropriate unless one of the following exceptions applies:

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it.

These are: ii. engineering operations;

Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential water and wastewater infrastructure (engineering operations) required to serve new and existing customers. This is because there are limited options available with regard to location, as the infrastructure would need to connect into existing networks.

The National Planning Practice Guidance recognises this scenario and states that '*it will be important to recognise that water and wastewater infrastructure sometimes has needs particular to the location (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'.*

We provide further specific comments on draft Policy 55 in relation to the Hampshire Water Transfer and Water Recycling Project (HWTWRP).

Recommendation

Having regard to the issue set out above, Southern Water recommends the following additional policy requirement to **Open Space.**

d. for the purposes of essential utilities infrastructure (where no reasonable alternative site is available),

HAVANT WATER TRANSFER AND WATER RECYCLING PROJECT

Southern Water provided representations with reference to the HWTWRP to the Regulation 18 consultation. Southern Water have submitted an application for development consent for the HWTWRP which has been accepted for examination by the Planning Inspectorate.

The proposed HWTWRP infrastructure within Havant includes the Water Recycling Plant (WRP) site, Havant Thicket Reservoir (HTR) in part, the pipelines between Bedhampton Springs to HTR, Section D of the pipeline between the WRP site and Otterbourne Water Supply Works (WSW), and the existing Eastney Transfer Tunnel (TT).

The WRP site is allocated for employment use (Policy BD11) in the adopted development plan. Havant Borough Council proposed the removal of this allocation in the Regulation 18 consultation draft for the emerging plan.

SW's representations to the Regulation 18 consultation recommended identifying the site as safeguarded land for infrastructure development to reflect the proposed use as part of the HWTWRP. This recommendation has not been taken up by HBC in the Regulation 19 draft, leaving the site as unallocated for development. Southern Water note the Council's position and the constructive dialogue during the pre-application period for the DCO application. Through that engagement Havant Borough Council have confirmed that it agrees that the principle of use of the site for the proposed WRP is appropriate and the site selection methodology was robust. Retaining the site as 'unallocated' land does not conflict with or contradict this position and we note that the Council will continue to keep this under review as the DCO progresses. Southern Water is therefore satisfied with the position taken by the Council on this matter.

We also note that the proposed WRP site is located within the proposed defined settlement boundary. Draft Policy 2 states that "Development within the settlement boundary (as defined on the Policies Map) is acceptable in principle".

This is broadly consistent with the adopted development plan which includes the WRP site within the Urban Area Boundaries. Southern Water supports the inclusion of the site within the defined settlement boundary.

The WRP site is also identified within Policy 4: Coastal - Infrastructure and Environmental Mitigation to Support Development (Broadmarsh). This designation relates to land safeguarded for the delivery of infrastructure and environmental mitigation measures, namely in this case Langstone Flood and Coastal Erosion Risk Management Scheme – Broadmarsh Landfill Revetment. The majority of the WRP site is within the area covered by this policy its development would not prevent the delivery of flood and coastal erosion measures at Broadmarsh. We therefore have no comments on this policy.

The draft Policies Map identifies a 5.6km buffer from the Solent SPA (which covers the WRP site and all the surrounding area). Policy 23 relating to recreational disturbance on international sites is not relevant as only relates to new dwellings or other overnight accommodation

The proposed WRP site also falls within Draft Policy 26: Solent Wader and Brent Goose Strategy Sites which recognises the importance of these sites for wintering bird species. The adopted and emerging policies for Wader and Goose sites are broadly seeking the same outcome, namely protecting habitats and compliance with the Habitat Regulations. The emerging policy is more aligned with the Solent Wader and Brent Goose Strategy (SWBGS) and places greater emphasis on evidence, mitigation and legal securing of measures. Southern Water agree with this policy and the HWTWRP is taking measures to comply with these requirements.

The proposed WRP site is also included within the proposed Protected Open Space policy under Policy 55. We are not clear why the WRP site has been identified as Protected Open Space. It is identified as an employment development site in the current local plan, has very limited amenity value it is not mentioned in the addendum to the Open Space Strategy (June 2026). As above, the Council are also fully aware of, and agreeable to, the proposals to accommodate the WRP on the site. We believe that its inclusion within this draft designation may be in error.

Recommendation

We strongly recommend that the proposed WRP site which forms part of the HWTWRP is excluded from the open space designation under Policy 55 as shown on the draft Policies Map.

There is no rationale or justification for the inclusion of a site on which the principle of development is firmly established.

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Strategic Flood Risk Assessments

Strategic Flood Risk Assessments

Strategic Flood Risk Assessments (SFRA) are prepared by Local Authorities as part of the evidence base for their Local Plans.

The objectives of an SFRA are in line with the overarching aims set out in the NPPF and guidance set out in Paragraph 09 of the Planning Practice Guidance (PPG): *Flood Risk & Coastal Change* as follows.

- Inform the sustainability appraisal of the Local Plan, so that the flood risk is fully taken into account when considering site allocation options and in the reparation of plan policies;
- Apply the Sequential Testing, and where necessary, the Exception Test when determining land use allocations;
- Inform the allocation of land to safeguard it for flood risk infrastructure;
- Identify policies for change of use and reducing the causes and impact of flooding;
- Identify the requirements for site specific flood risk assessments in particular locations, including those at risk from sources other than river and sea flooding;
- Determine the acceptability of flood risk in relation to emergency planning capability;
- Help demonstrate how the adaption of climate change has been met.

In preparing an SFRA the Local Authority will follow the Environment Agency's Guidance *'how to prepare a strategic flood risk assessment'* (March 2022), which states that an SFRA is required to be able to:

- Carry out Sequential Test for the Local Plan or spatial strategy;
- Carry out Sequential Test for individual Planning Applications;
- Do the Exception Test for the Local Plan, for proposals to allocate development in flood risk areas;
- Establish if a development can be made safe without increasing flood risk elsewhere;
- Decide when a flood risk assessment will be needed for individual Planning Applications;
- Identify if proposed development is in functional floodplain;
- Identify and safeguard from development, land likely to be needed for future flood risk management features and structures and;
- Do the sustainability appraisal of the Local Plan or spatial development strategy.

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Strategic Flood Risk Assessments

Our Role in Flood Risk Management

Southern Water acts as a Risk Management Authority (RMA), focusing on preventing sewer flooding, managing wastewater, and reducing storm overflow spills through infrastructure investment and nature-based solutions.

We manage the public sewer system to protect homes and businesses, operating within legal regulations to handle sewage capacity during heavy rainfall and reducing groundwater infiltration.

Key aspects of Southern Water's role in flood risk management include:

- **Infrastructure Management:** Maintaining and upgrading sewers to prevent flooding from overloaded systems.
- **Surface Water Management:** Implementing Sustainable Drainage Systems (SuDS) like rain gardens, tree pits, and swales to reduce pressure on public sewer systems.
- **Storm Overflows:** Using storm overflows to prevent sewage from backing up into properties during extreme weather, while working to reduce their frequency.
- **Planning and Risk Identification:** Utilizing Our Drainage & Wastewater Management Plans (DWMPs) to identify areas with high flood risk (e.g., 1-in-30-year storm events) and planning improvements to 2050.
- **Collaborative Action:** Working with local councils and the Environment Agency to reduce surface water flooding and environmental impacts.

We aim to reduce storm overflow spills by 8,000 annually by 2035 via our Clean Rivers and Seas Plan Clean Rivers and Seas Plan | Southern Water

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Our Response to Strategic Flood Risk Assessments

Surface Water Management

Climate Change will bring greater variability of our weather with warmer wetter winters and hotter drier summers. The impacts we will see will be more intense summer storms that exceed the capacity of the drainage and wastewater networks and cause localised flooding.

Climate change is expected to have an impact on the risk of flooding in several wastewater systems in the wider area, and the flooding risk will increase by 2050 in all wastewater systems unless measures are taken to manage and reduce these risks.

Adaptation to climate change will need to consider options **for reducing the volume of surface water entering the sewer network** in order to avoid the need for significant increases in the capacity of the existing drainage and wastewater networks.

An SFRA can play a key role in preventing additional surface water entering wastewater sewer networks.

We need the Assessment to recognise that climate change now demands we re-think and re-design communities and ensures that rainwater will not run off homes and surfaces so fast that it causes flooding and storm discharges into rivers and seas.

In terms of flood risk, better rainwater management is key to achieving not only a reduced risk of flooding, but also a reduction in storm overflow releases and reduced demand on water resources. To help achieve this, Southern Water supports guidance that prioritises on-site surface water management through effective Sustainable Drainage System (SuDS) provision.

Southern Water will refuse any request to discharge surface water into our 'foul only' sewer network and resist a discharge to the combined sewer network, on the grounds that the discharge is detrimental to our sewerage network and can be harmful to the environment. This includes where the surface water hierarchy has been followed and all alternative options have been exhausted.

This approach ensures that we work together with local authorities to better protect the environment, improve water quality, and reduce flood risk. It also supports our work to separate rainwater from sewage at source to meet storm overflow reduction targets under Defra's Storm Overflows Discharge Reduction Plan, as well as to reduce the number of sewer flooding incidents that are caused by hydraulic overload of our sewer network during periods of sustained rainfall.

The above is supported by our Surface Water Management Policy, which is available to **view on our website**.

It is also supported by the National standards for sustainable drainage systems (SuDS) - GOV.UK which states the following in **Paragraph 1.10** - **Surface water runoff from the development shall not discharge to a foul drainage system.**

SuDS should be designed in accordance with the National Standards linked above and any systems proposed for adoption to Southern Water should meet the technical standards set out in the Sewerage Sector Guidance - approved documents | Water UK

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Strategic Flood Risk Assessments

In summary, new development should -

- Take account of flood risk through their location and design, existing flow routes and drainage features within the site should be identified and preserved eg ditches, seasonally dry watercourses, historic ponds.

- Integrate sustainable drainage systems, to minimise and control surface water run-off, provide flood storage capacity and improve habitats and species migration. SuDS should be in conformity with the National Design Standards and measures should include source control components such as rainwater re-use/harvesting, green roofs, rain gardens, trees, permeable paving. Multi-functional SuDS features should be used to meet several planning policy requirements within the same area of the site eg biodiversity, amenity, green infrastructure, flood risk, drainage.

- Minimise the risk of sewer flooding and protect water quality, by not discharging surface water to the foul sewer network.

Responsibility for Flood Management

It is important that the Strategic Flood Risk Assessment sets out clearly who is responsible for different types of flooding, as per our website -

Who Is Responsible For Flooding? - Southern Water

The Assessment should cover the roles of the following authorities.

- **Lead Local Flood Authority:** Surface water, ordinary watercourses, and groundwater.

- **Environment Agency:** Main rivers and coastal flooding.

- **Highways Authority:** Road flooding.

And should explain the approach taken by each authority to managing the risk of flooding from these sources, including maintenance schedules for such assets as road gullies, ditches and culverts, as when these assets are blocked, it can cause surface water to run off into sewer systems and increase the risk of sewer flooding.

Records of Sewer Flooding

A statutory wastewater undertaker is required to record all instances of internal and external flooding, and these records are usually known as the ‘DG5 list’ or the ‘flood risk register’.

Records of sewer flooding should be requested as an Environmental Information Request | Southern Water.

These requests are administered by an EIR (*Environmental Information Regulations*) Officer in the Environment, Social & Governance Team.

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Strategic Flood Risk Assessments

They are contactable at sm_eir@southernwater.co.uk and a response should be provided within 20 working days.