



Your ref

By email to planning.policy@medway.gov.uk

Our ref

Date
8th February 2024

Dear Sir/Madam,

Hoo St Werburgh and Chattenden Neighbourhood Plan Public Consultation

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

Southern Water is both the statutory water supplier and sewerage undertaker for your neighbourhoods. Southern Water has a statutory duty to serve new development, and is committed to ensuring the right infrastructure in the right place at the right time in collaboration with developers, parish councils and the local planning authority.

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

Yours faithfully,

[Redacted signature block]

Policy HOO6: Design

We support the inclusion of SuDS in this policy, and as explained within our consultation response to the Pre-Submission stage, we would also support inclusion of water efficiency targets. Although the section included within the chapter interpreting Policy HOO6 mentions water efficiency targets, these are not incorporated within planning policy wording. Nor is there an explanation of the importance of water efficiency to the Hoo St Werburgh and Chattenden neighbourhood area.

The south east is classified as an area of 'serious water stress', and a variety of factors such as an increasing need to limit surface and groundwater abstractions, increase drought resilience, meet the needs of a growing population and adapt to climate change, all combine to present both challenges and opportunities to change the way we manage water. Whilst tackling this challenge will require a multi-faceted approach, there is an opportunity for all levels of the planning system to play their part, by ensuring through policy that new development is required to meet higher standards of water efficiency.

High standards of water efficiency in new developments equate to greater long-term sustainability – with the potential to delay or reduce the need to increase abstraction or find new water resources. We therefore recommend as a minimum the tighter Building Regulations optional standard for water efficiency of 110 litres per person per day be incorporated within the Neighbourhood Plan policies. This standard is appropriate to the 'serious water stress' status of the South East. We would also welcome tighter targets than this for the following reasons –

- Growing populations combined with climate change impacts over time mean we need to look towards significantly reducing water consumption into the future. Adopting targets would help to achieve this, and ensure the adaptability of homes to meet the longer-term environmental impacts of climate change.
- The South East region incorporates many environmentally sensitive areas. Significant challenges and environmental improvements need to be addressed, while at the same time enabling some of the highest rates of growth in the country.
- Southern Water is already working to reduce per capita consumption by customers across its region to 100 litres per person per day.

Proposed amendments

To ensure consistency with the NPPF and ensure sustainable development that considers the impacts of climate change into the future, we recommend the following changes to the Design policy HOO6 (additional text underlined):

- 4) Development should incorporate positive design features to reduce carbon use, support biodiversity and address climate change.

Proposals for development must incorporate measures to support a water use target of 110 litres per person per day.