

Consultation Response – Mr Oliver Landau-Williams - Resident

Question 1: Which Main Modification does this comment relate to?

MM088 - 1K

Question 2: Do you consider that this Main Modification is:

None of the above

Question 3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Water resilience and management is especially critical - why has this been removed from the consultation plan, and ultimately no longer considered of value for planning?

Question 4: Please set out what change(s) you consider necessary to make the main modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

The Main Modification should be amended to retain and strengthen the provisions relating to water management, water conservation and water resilience, rather than removing them. At minimum, the previous wording should be reinstated until the Council has demonstrated, through proportionate and up-to-date evidence, that the planned scale and location of development can be supported without creating unacceptable pressures on water supply, wastewater infrastructure, water quality or flood risk. I suggest the following replacement wording: Water resilience and integrated water management Development proposals, particularly major residential developments and strategic site allocations, will only be supported where it is demonstrated that: adequate potable water supply and wastewater treatment capacity will be available when required, taking account of the cumulative demands arising from planned development; development will be appropriately phased, and will not be occupied until any necessary water-supply, sewerage or wastewater-treatment improvements have been completed; water demand will be minimised through a measurable water-efficiency standard that is no weaker than the applicable national requirement, with the tighter optional Building Regulations standard, or any subsequently adopted equivalent, applied where supported by local evidence; an integrated approach is taken to water management, including water-efficient fittings, rainwater collection, water reuse and grey-water systems where technically feasible and proportionate; surface water is managed through multifunctional sustainable drainage systems in accordance with current national SuDS standards, following the drainage hierarchy and ensuring that flood risk is not increased either within the site or elsewhere; development protects and, where possible, improves surface water, groundwater, local watercourses and the wider catchment; and clear arrangements are established for the long-term management, maintenance and monitoring of water-management and drainage infrastructure. Strategic allocations should be supported by an up-to-date Water Cycle Study, Strategic Flood Risk Assessment and evidence from the relevant water and sewerage undertakers, the Environment Agency and Lead Local Flood Authority. Where infrastructure constraints are identified, the policy and infrastructure delivery plan must specify the improvements required, the responsible delivery body, the funding mechanism and the point at which development may be occupied. These changes are necessary because national planning policy requires strategic plans to make sufficient provision for water supply, wastewater and flood-risk infrastructure. It also requires plans to address climate-change adaptation, water scarcity, drought and flood risk, and to set out the flood and water-management infrastructure expected from development. Reinstating clear and measurable requirements would make the Main Modification: positively prepared, by ensuring that the proposed housing growth is aligned with the infrastructure and natural resources needed to support it; justified, by requiring the policy to be based on proportionate water-cycle, drainage, flood-risk and infrastructure evidence; effective, by specifying deliverable standards, responsibilities and phasing requirements rather than leaving these matters to individual planning applications; and consistent with national policy, which requires a proactive approach to water supply, water scarcity, wastewater, sustainable drainage and flood risk. Government planning

guidance specifically recognises that water-cycle evidence can be used to determine whether existing water and wastewater infrastructure can accommodate planned growth, whether enhanced water-efficiency policies are required, and how development should be phased so that necessary infrastructure is in place before occupation. The deletion of water-management and conservation provisions should therefore be reversed unless the Council publishes a clear, evidence-based explanation demonstrating why their removal is justified and how the remaining policies will provide an equivalent or stronger level of protection. Without such provisions, the modification is not sufficiently justified, effective or consistent with national planning policy.

Question 5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below.

I am concerned that the Integrated Assessment Report Addendum does not adequately recognise or assess the potential environmental, social and infrastructure consequences of removing the provisions relating to water management, water conservation and water resilience. The deletion should be assessed as a substantive change rather than treated as neutral or merely editorial. Removing explicit policy requirements could weaken the Plan's ability to manage the cumulative effects of the proposed level of housing growth, including increased demand for potable water, additional pressure on sewerage and wastewater-treatment capacity, increased surface-water runoff, flood risk, risks to water quality and reduced resilience to drought and climate change.

Question 6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below.

No separate revision to the Policies Map can compensate for the removal of clear policy requirements concerning water management, water conservation and water resilience. Where the proposed Policies Map revisions relate to major housing allocations or strategic development areas, the mapped boundaries and supporting policy information should be checked against the most recent evidence concerning flood risk, surface-water drainage, watercourses, groundwater protection, wastewater infrastructure and other relevant water-management constraints.

Question 7: Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below.

I object to any Additional Modification that removes, weakens or makes consequential deletions to references concerning water management, water conservation, water efficiency, drainage, wastewater capacity, flood risk or climate resilience. Additional Modifications are intended to be minor changes, such as factual, presentational or typographical corrections. Planning Inspectorate guidance states that an authority may make minor modifications on adoption only where they do not materially affect the Plan's policies. The removal or weakening of a substantive water-management requirement would materially affect how development proposals are assessed and could influence the environmental and infrastructure consequences of major housing growth. Such a change should not therefore be treated as a minor Additional Modification. Where an Additional Modification is consequential upon the removal of the water-management and conservation provisions, that modification should be withdrawn. The relevant wording should instead be retained and considered as part of the substantive policy and Main Modification process, including proper assessment through the Integrated Assessment. Any wording that suggests water supply, wastewater capacity, drainage or water conservation can be dealt with solely at the planning-application stage should also be reconsidered. These are strategic and cumulative matters that must be addressed when deciding the appropriate scale, location and phasing of development.