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Friday, 19 August 2022

Dear Councillor Stedman and Mr Robins,

**Redrow Homes - Hesmond's Stud Detailed Planning Application WD/2022/0341/MAJ**

**Village Concerns Objection 14 -  
Water Supply**

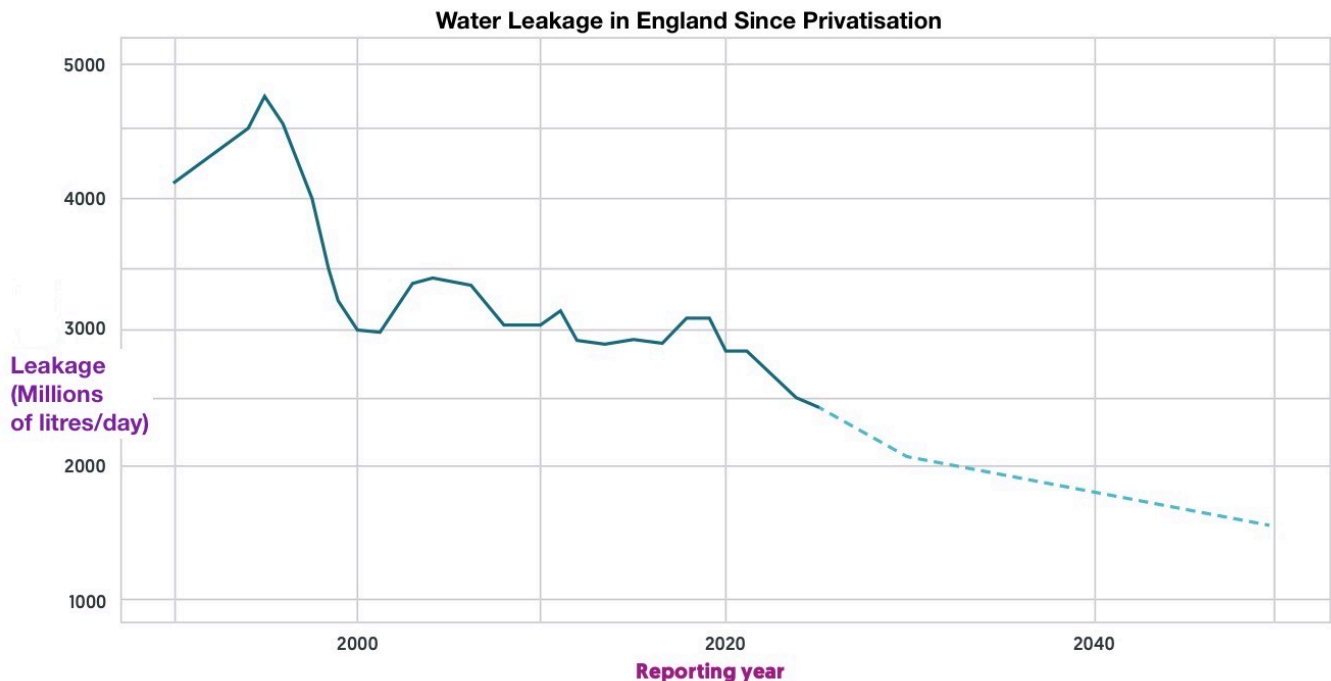
1. We are writing to you as the Co-Chairs of Village Concerns, a local Action Group from East Hoathly with Halland Parish. We represent the views of over 200 supporters against the overdevelopment of our Parish.

2. The Government Review of England's Emerging Regional Water Resources Plans dated 24 May 2022 revealed the parlous state of the water supplies in the South East of England. This is by far the worst Region in England with an expected deficit of public water supply of 47% by 2050. It states that this deficit is being driven by the following additional demands:

Climate Change Impact to Supply	11%
Environment Destination Total (See Paragraph 6)	49%
Demand from Household Population Growth	26%
Resilience move to 1:500	14%

3. In an attempt to meet this deficit, the plans propose a reduction in leakage of 52% by 2050. This is not credible. Water Companies have consistently failed to meet their leakage reduction targets yet still claim that it will solve tomorrow's problems. You should also note that in the 33 years since the water companies were privatised, they tackled all the easy fixes and least expensive repairs in the first decade. Since then, the wastage has remained broadly static as can be

seen on the Water UK (A body representing the privatised water companies)  
Chart shown below:



4. Somewhat in contradiction to steady reductions predicted on the Water UK Chart shown above, the Environment Agency recently reported that the annual amount of water lost by leaks had risen to 2.34 billion litres (an increase from the previous year) Clearly the direction of travel of the leakage statistics is questionable and there is no reason to believe that the water companies will tackle this problem and achieve a 52% reduction in leakage by 2050.

### **Environment Destination**

5. The Environment Destination is a new concept established by the Environment Agency to attempt to prevent damage to the environment and biodiversity. It seeks to prevent the deterioration of water bodies, address unsustainable abstraction and improve environmental resilience in the face of climate change. Environment Destination is by far the largest driver (49%) of the forecast deficit and yet there is almost no data or plans to show how this will be tackled.

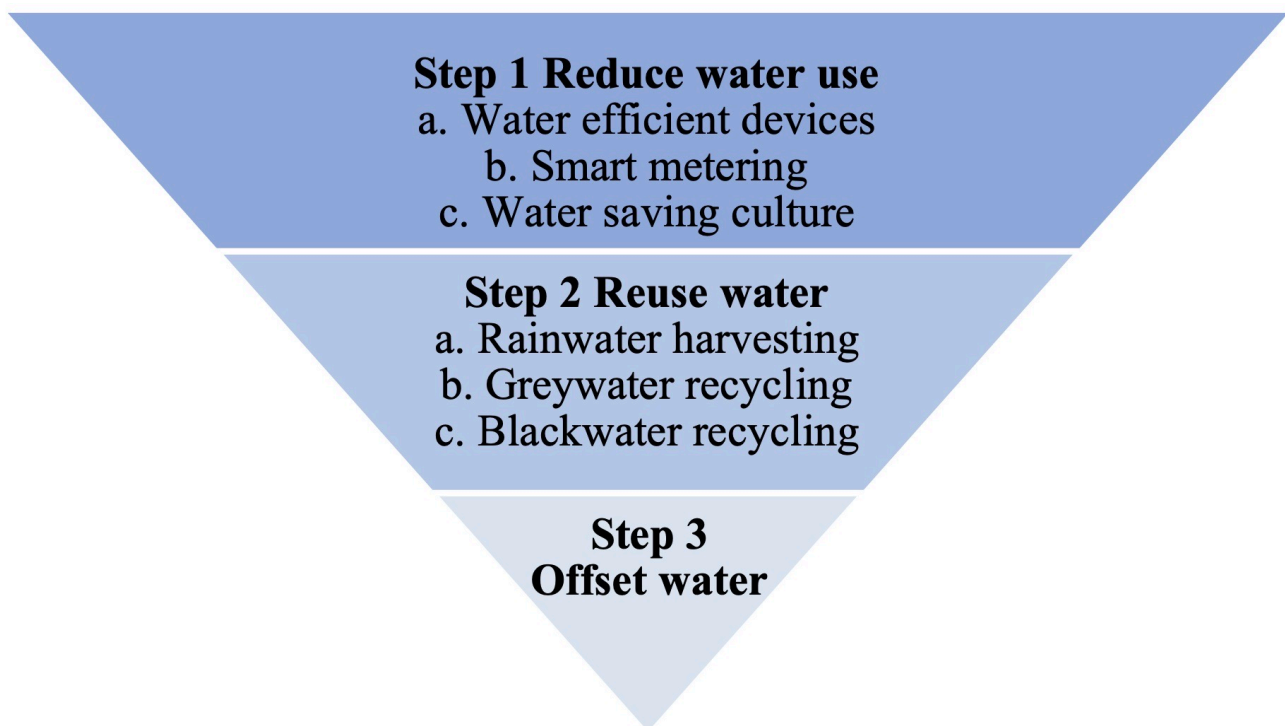
### **Infrastructure Projects**

The requirement to produce a Plan to tackle this crisis sits with Water Resources South East (WRSE) which is a relatively new body representing six utility companies in the South East of England. Their website shows contradictory

plans for the future of the South East. One of their concepts for the future shows a proposed new reservoir at Blackstone near Henfield, one shows a desalination plant at Shoreham and another shows a desalination plant near Hastings. Clearly ideas are floating around but nothing seems remotely identifiable as a plan with dates, costings and land acquisition or planning feasibility.

## **Water Neutrality**

Water Neutrality is something that is essentially ignored by the planning system and yet it should be a fundamental part of all new developments. The Environment Agency definition is: “For every new development, the predicted increase in total water demand in the region due to the development should be offset by reducing demand in the existing community”. Waterwise (a UK not for profit NGO) suggest the following hierarchy of how Water Neutrality should be achieved:



Sadly none of these measures is compulsory (water meters are required on all new builds but not smart water meters) and Village Concerns has not seen any planning application in Wealden that reflects any of them. Planning Authorities can impose limits on daily water usage (Building Regulations Part G) for new builds that would force developers to act on Steps 1 and 2 but there is no evidence that this is even considered. Current Building Regulations allow Local Authorities to control, by Planning Condition, that any new build will conform to a lower level of water consumption from 125 to 110 litres of water per person per

day. These levels are being reviewed by the Government and are likely to be reduced. However, this will be irrelevant if Wealden choose not to enforce them.

Natural England have imposed limitations on development in the Sussex North Water Supply Zone unless Water Neutrality can be proven. This action by Natural England is quite proper and sensible. Village Concerns would like them to extend their scrutiny to the Wealden area and many other areas in the South East that are under water stress and are almost certainly requiring similar action. Has Wealden had the levels of its water abstraction assessed to determine if it is causing harm to the environment and biodiversity ?

To propose to build 205 new homes when we cannot be certain that Wealden will have enough water to supply them in 2050 seems irresponsible. None of the Redrow plans mention rainwater harvesting, grey water recycling or black water recycling. The planning conditions put forward for Planning Application WD/2022/0341/MAJ did not specify that the lower level of water usage would be enforced. It does not help that another utility company are the cause of increasing levels of sewage overflows that are polluting the drinking water sources required for any new homes.

Please could you establish that sufficient water will be available for these new homes before you determine this application.

Katherine Gutkind and Kathryn Richardson  
Co-Chairs  
Village Concerns

cc

Nusrat Ghani MP  
Natural England  
Councillor Draper  
Councillor Millward  
Parish Council

Councillor Snell  
Councillor Blake-Coggins  
Councillor Bowdler  
Councillor Cleaver  
Councillor Grocock  
Councillor Guyton-Day  
Councillor Howell  
Councillor Stephen Shing

Councillor Watts  
Councillor White  
Councillor Baker  
Councillor Cade  
Councillor Clark  
Councillor Coltman  
Councillor Doodes  
Councillor Douglas  
Councillor Hallett  
Councillor Johnson  
Councillor Lunn  
Councillor Moss  
Councillor Owen-Williams  
Councillor Redman  
Councillor Daniel Shing  
Councillor Sparks