

Matter 5.8 : Adequacy of water supplies / sewerage services and effect on river flows and pollution levels

1 Statement : the Core Strategy [CS] is unsound

1.1 Water is a critical resource for any proposed development. It cannot be fudged. If there is insufficient water to supply the planned development it cannot go ahead at the level proposed in the CS. Despite its self-evident importance, this subject merits only a single 5-line paragraph in the CS document [5.31(b)] and a few other lines none of which provide explanations of the issues surrounding adequacy of supply.

1.2 I consider the Strategy to be unsound and untrustworthy in two respects

- (a) the full facts and assumptions made are not set out at all in the CS document
- (b) the evidence base [Topic Papers 17 and 18] underpinning the CS is unsound

2 Evidence for concerns on unsoundness

2.1 The CS in regard to adequacy of water resources is based entirely on the Wessex Water [WW] Resources Plan and the assurance contained that there will be sufficient water for all the development proposed up to 2026, despite the admission that without additional resources Salisbury will be in water deficit by 2015. [para 4.4 – all references to Topic Paper 17] The Council rely entirely on the WW assertion that they will overcome this by creating a water grid to bring water to Salisbury from their wetter areas. However the CS document does not make it clear that WW expresses several reservations in its plan

- (a) this is a “general view” and a “high level assessment” [4.22]
- (b) it is “not a definitive view of strategic options” [4.22]
- (c) there has been no detailed engineering assessment [4.23]
- (d) indicative [ie broadly estimated] costs used [4.24]

There is no indication anywhere that the WW plan is subject to significant objections from the Environment Agency [EA] which have not been resolved. [Topic Paper 18 is largely irrelevant because the earlier work indicating adequacy of water supplies has been superseded by the 2008 reduction in EA extraction consents. One paragraph [5.4.3] accepts that supply will be inadequate unless the grid is put in place.]

2.2 The WW plan on which the CS relies is based on a projection of 5,400 p.a. new homes in the area it serves. However the RSS for the same area plans for 8,000 homes p.a. [see appendix to this paper] for the 20 years to 2026. I have discussed this discrepancy with WW who say they have adjusted the RSS figure downwards to take account of ONS estimates of population growth, the economic downturn and their experience that “regional plans do not outturn as planned”. However the CS continues to propose household growth at the RSS rate despite WW’s assurance of supply being calculated on a figure 32.5% lower. This cannot be soundly based.

On numbers it is also notable that Topic Paper 17 [para 4.21] refers to only 6,270 new homes rather than the 12,400 that the CS itself proposes.

2.3 The WW plans are based on consumption projections that are underpinned by an assumption that all unmetered homes will be converted to a meter on change of ownership. They project a fall from the current 65% unmetered homes to approx 15% by 2026. They believe that each home converted will consume 12% less water and therefore a reduction of 50% in unmetered households will lead to a 6% reduction in consumption which is fed into their resources planning, and thereby into the CS. However this would require the obligatory conversion on change of ownership which did not meet with OFWAT approval and was ruled out in 2009 for several years at least.

Relying on this uncertain proposal to support adequacy of water resources is further evidence of unsoundness.

2.4 The Environment Agency has raised issues about the ability of a grid system to avoid low flows and high nitrate levels in the rivers in and around Salisbury. The WW plan itself accepts that this will be an increasing problem as the climate changes with increasing number of drought periods. Already water sources in the Salisbury area are “at risk of exceeding permitted nitrate levels”.

As a result of this DEFRA wrote to WW on 3 August 2009 saying that “material information is missing from your [i.e. WW’s] plan” and in particular asks for information to support the grid option.

I consider it must be unsound for the CS to rely on a WW plan that at present at least is clearly defective. Moreover the CS document does not even mention the issue of nitrate levels which is described by WW as “one of their biggest challenges”.

3 Recommendation for amending plan

3.1 The Council, as advised by WW, should reduce the projected growth in homes to that supported by WW in its water resources plan

3.2 The council should also make explicit in the plan that even this growth is dependent on

- (a) DEFRA full approval of the WW plan for a grid
- (b) obligatory conversion of unmetered properties on change of ownership

And if either or both of these are not achieved the level of growth in homes should be further reduced based on an appropriate recalculation by WW

3.3 The CS should be explicit in stating the costs, and the source of finance, for the grid, new sewage facilities and nitrate reduction plants. These should be based on a detailed engineering assessment and full [as opposed to indicative] costing.

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Appendix : Projected Household Growth 2006 – 2026 Wessex Water area

The figures in this schedule are taken from the Regional Spatial Strategy for the South-West region and cover all the areas supplied by Wessex Water. The figures have been shown to Wessex Water and not disputed.

Bridgewater and Taunton	34,500	
Yeovil	19,700	
Weymouth	18,100	
Poole [+ E/N Dorset, Purbeck]	28,550	
Bath	21,300	
Trowbridge [W. Wilts]	12,300	
Malmesbury [N. Wilts]	13,700	
Salisbury	12,400	
TOTAL	160,550	over 20 years to 2026

The RSS is therefore projecting a growth of just over 8,000 household per annum. Wessex Water has adjusted this figure to take account of ONS population estimates, the economic downturn and their experience that regional plans tend to outturn lower than projections. As a result they use a growth figure of 5,400 households in their Water Resources Plan