6002030 - AP/26/0017: Land East of Ansty (Cuckstye) Appeal

Interested parties. Cuckfield Parish Council – Andrew Burton, Chair

Water Resources and Availability

June2026

Inspector,

I'm Andrew Burton, Chair of Cuckfield Parish Council,

You're hearing numerous arguments, which Cuckfield Parish Council support, on why this Cuckstye proposal is the wrong development in the wrong place at the wrong time.

However, I want to focus on a single argument, one which my constituents are rightly asking me about on numerous occasions but is strangely absent as a key issue here. That is, where is the water to supply all these new houses going to come from, and what happens once it's been used.

By way on context at this point, whilst I'm not an expert to this Inquiry, I am by profession a Chartered Water and Environmental Manager, a Chartered Civil Engineer and Fellow of the Institution of Civil Engineers, and I sit on the Institution's Water Expert Panel for the South East Region, so I do feel have some qualification in this area.

Water is a **fundamental constraint** that I'll explain through strategic failure, lack of investment, system fragility and future capacity, should weigh decisively against this particular development. Against the backdrop of approximately 50% of the UK's 1.5m new houses being destined for the South-East region, the government chooses to focus the NPPF (through Para20) on only a high-level assessment of infrastructure provision.

But the developer's 'right to connect' to a water supply under the Water Industry Act 1991 throws the water resources issue squarely over the fence at the water companies, who in turn are not permitted to object to planning issues on available capacity grounds, but in turn again can only invest in what regulator Ofwat agrees to (in fact I can see no response from South East Water on the Appeal website). And the latter has focussed for many years now on lowering bills.

There is, as the 2025 Cunliffe report on the water industry highlights, a systemic failure with everyone concerned looking in the other direction! Despite NPPF Para 11a expecting infrastructure alignment with development, one might suggest there is an element of deniable culpability for the planning policy setters.

According to the UK Centre for Ecology and Hydrology the South has recently had the fourth wettest winter on record. Followed by a few weeks' dry spell. But then a week of hot

last week prompts South-East and Southern Water to be sending correspondence urging everyone to urgently conserve water (see below). And they are now consulting on their updated Drought Plan. The Consumer Council for Water in their 2026 annual report indicates that overall trust in water companies' performance has hit a 13-year low, and perhaps it's not difficult to see why.

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1. Strategic failure

First, there is a clear absence of a **deliverable and credible water strategy for the South East of England**.

The Government's own analysis from December 2024 confirms that England faces a **major structural supply deficit by 2050**, driven by population growth and new house building, environmental protections and climate change.

Average usage is currently around 140 litres per person per day with consumption having risen by 70% since the mid-80s. Whilst the Environment Agency is aiming to reduce demand by around 15% by 2038, they also say we need an extra 2.6 billion litres a day in the SE by 2050.

Water companies have committed to a 25% reduction by 2050 and they produced a regional plan in 2025 - Water Resources South East (WRSE) plan — which they say highlights how future water demands may be met:

- However, it places **significant reliance on reducing demand simply by assuming customer behaviour can be changed**, with various other unproven or uneconomic actions, such as water recycling schemes and catchment transfer via the Grand Union Canal, spread over decades. Horsham's Water Delivery Taskforce's so-called 'deal' in 2025 was also resolved through a promise of these actions. But the positive outcomes required from these have never been achieved, anywhere.
- **Any major new supply infrastructure for the Mid Sussex District is decades away and uncertain today**. The Broad Oak Reservoir proposed for Kent is too far and not relevant. The Adur Offline Reservoir doesn't even have a defined location yet and isn't slated until the late 2040s. What we do know is that **Havant Thicket reservoir near Portsmouth, the first in the UK in 30 years, took 25 years to plan and construct.**
- This is not a strategy that supports the short or even medium timescale major housing expansions like Cuckstye which is being promoted now. It is a strategy that **assumes future highly uncertain behavioural change and infrastructure delivery over decades**. Many in the industry are therefore concluding that government, the regulators and the water industry are simply focussing on short term concerns and crossing their fingers that it'll rain harder in the long term!

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2. Lack of historic investment

Second, we must consider the **historic context in water resource infrastructure investment**

In this part of Sussex:

- **Weir Wood Reservoir dates from 1954**
- **Ardingly Reservoir dates from 1978**

Since Ardingly was completed, the region has experienced **substantial housing growth** — around 40,000 new houses estimated, yet **no equivalent major new raw water sources have been delivered locally**.

Even Government has finally acknowledged that the UK has failed to invest in new reservoirs and are now trying to redress this

So, we have a simple imbalance: **decades of housing growth, without proportionate investment in water supply infrastructure.**

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3. Evidence of system fragility

Third, and this is not theoretical — the system in this District is already under significant system fragility and stress **today**.

In 2025:

- The major supply asset in the region, Ardingly Reservoir, **fell rapidly during hot weather**, dropping from 100% to just **27% capacity in a few short weeks**, triggering drought measures once again across Sussex. Groundwater depletion through borehole abstraction was also rapid.
- This is critical: The key strategic water resource assets for the District can fall from normal levels to critical capacity within a single season. If the dry spell had continued (as it has in previous years) and we'd hadn't had one of the wettest winters, we'd be experiencing serious difficulties right now. That is the reality in this catchment.

More recent evidence shows:

- **Major supply failures affecting tens of thousands of homes in South-East Water's area of Kent and Sussex.** Up to **30,000 properties have been impacted**, with outages, low pressure and emergency bottled water distribution. It's in the news virtually every day.
- This includes a major **water quality and supply crisis in Tonbridge Wells affecting around 24,000 homes** and lasted several weeks. It's clear that could happen anywhere in the region.

- Even with Ardingly being so close, Cuckfield in 2024 experienced 10 days of water outage due to failing infrastructure, with regular shorter outages as recent as yesterday. I know of two people in newish homes who are so fed up with it, they're retro-fitting water storage tanks in their lofts.

These are not isolated incidents in another part of the country. They demonstrate Cuckfield's network is already operating **at or beyond resilience limits, with no system headroom**.

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5. Climate change will exacerbate the problem

Looking forward, we are seeing the predicted impacts of climate change, which will only worsen the situation.

Climate change is:

- Increasing **peak summer demand**,
- Reducing **reliable river flows**,
- Increasing the **frequency of drought conditions**.

The Environment Agency is clear that **replenishment takes sustained long-term rainfall**, not short wet periods. This is not a problem that can be "fixed later":

Water resource infrastructure takes **decades to plan, consent and deliver**.

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6. Wastewater capacity – already constrained

But water supply is only one side of the issue. Wastewater systems are similarly constrained:

- Treatment works are typically designed to **maximum flow limits**, beyond which flows are diverted or discharged via combined storm overflows (CSOs). These are increasing across England, reflecting ageing infrastructure and increased loading from development.

In the case of **Cuckfield Wastewater Treatment Works**, the evidence indicates:

- No spare capacity within the system and hence there is substantial use of storm overflows – consistently 85-90 overflows a year according to available EA figures, with very high discharge duration of weeks at a time (1,077 hours in 2024). That's one every 4 days on average, with the associated considerable pollution impacts. That is not what we should be expecting from our water assets.

Southern Water's December 2023 consultation response said. "The Newbury Cuckfield and Ansty Wastewater Treatment Works currently does not have the capacity to

accommodate flows from the proposed development. Where development has been identified and allocated for future development by the Local Planning Authority, Southern Water will attempt to ensure capacity is available. Occupation of the development is required to be deferred until adequate capacity is available to serve the development. An initial modelling study **indicates that these additional flows may lead to an increased risk of foul flooding from the sewer networ**k

Doubling the size of the village will:

- Increase flows significantly, which will require a **major plant expansion**
- Trigger **years of design, funding, approvals and construction.**

This is not a short-term mitigation — it is a **long-term, significant infrastructure project** that is not in Southern Water's PR24 plans. **Given the industry AMP cycle, there is little prospect of this being in place within in the next 10 years.**

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7. The planning consequence

Taken together, the position is clear:

- No credible short or medium-term plan to increase water availability
- Over-reliance on demand reduction
- Existing infrastructure serving Cuckfield already being under stress
- Proven supply failures in the region, and more locally in Cuckfield
- Climate change already being experienced worsening the situation
- Wastewater systems already at or beyond capacity, leading to pollution and ecological stress

In planning terms, this is **not uncertainty.** It is a **known, material constraint for this development proposal and will mean development simply cannot be progressed for many years, and will therefore not likely help even longer-term housing targets.**

Conclusion

Water is not just another infrastructure consideration. It is a **fundamental prerequisite for sustainable development**. We cannot continue to just keep ignoring the impact that

another 1,450 houses will have and hoping that sufficient rain will continue to fall in this region. The evidence indicates that it will not.

Without secure supply and treatment capacity:

- Homes cannot function
- Communities cannot be resilient
- The environment will experience significant harm

For a scheme of this scale — increasing the size of the settlement dramatically — **water availability alone should be a defining issue.**

And on the evidence before us, that issue is not resolved.

For that reason alone, this development is simply unsustainable and should not be permitted.

Thank you.

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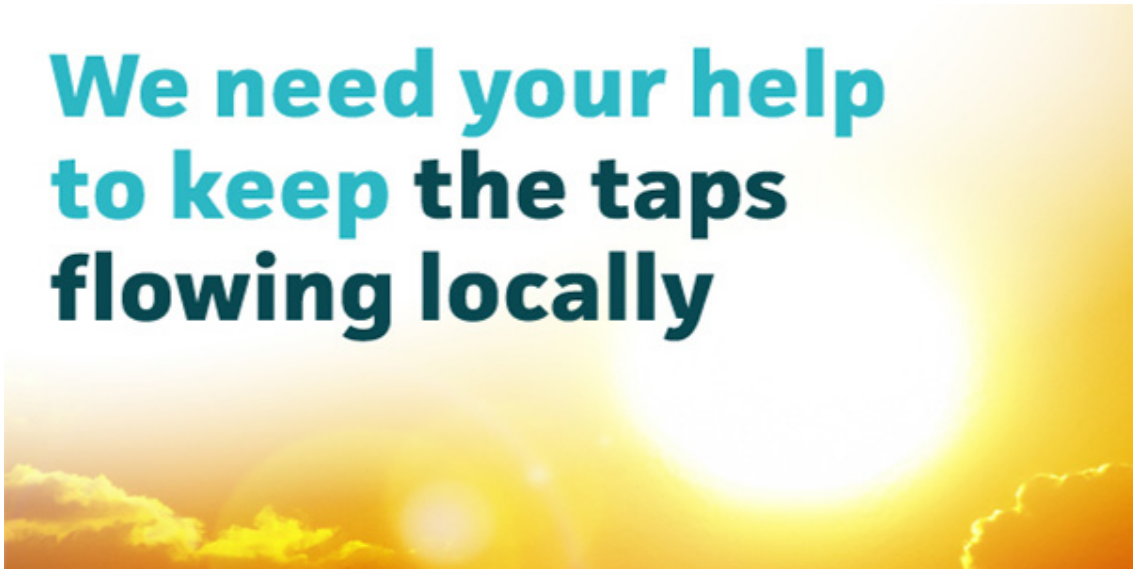

Water supplies are struggling in your area

We know some of you have been without water at times across the very hot weekend and we are incredibly sorry for this.

For those in supply, we now need your help. **Please use water for essential purposes only: drinking, washing and cooking.**

What's happened?

This weekend saw the first heatwave of the year and the hottest May day on record. As expected, demand for water has surged.

The water network is like a motorway, when everyone uses it all at once, roads come to a standstill. When a whole neighbourhood uses water all at the same time, it pulls water out of the local pipes so fast that the pressure drops. The result is the families living at the far end of the network or on higher ground can see their taps run completely dry.

We have also had some leaks and bursts on the network. We understand this is extremely frustrating. While this is normal across our 9,000 miles of pipe that works under high pressure at all times, we are working hard to fix these as quickly as possible.

The combination of high demand and normal levels of leaks and bursts has caused the intermittent supply issues. As the hot weather is set to last a few more days we're asking for your help to keep taps flowing locally.

Please use water for essential purposes only: drinking, washing and cooking.

What we're doing

We don't take this situation lightly.

Our teams have been working tirelessly to fix the leaks and bursts.

We planned for the hot weather by increasing output at our water treatment works across our supply area and putting extra water into the network.

Our fleet of tankers has been working 24/7 putting additional water into the network in areas where demand has been extremely high and to support our stored water reservoirs.

In some areas where there has been supply interruptions - or where we believe issues may occur - we have proactively delivered bottled water to our vulnerable customers on our Priority Services Register and we are supporting critical care sites like hospitals and care homes where necessary.

How you can help

Simple swaps can make a huge difference to help keep the taps flowing for everyone and prevent further measures.

- **Stop** using jet washes, hosepipes and sprinklers. Swap paddling pools for water blasters to keep kids cool and the car and patio can wait for a wash.
- **Think** about where you can swap tap water for recycled water. Reuse water from baths, showers and sinks in the garden.
- **Act** now, please do all you can to cut down on everything but essential water use, which is drinking, washing and cooking.

Keep up to date about supplies in your area

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Customer Services Director

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NEWS

South East Water launches Drought Plan consultation

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South East Water has published its draft Drought Plan 2027–2032, which sets out the steps it would take during periods of drought or high demand.

A spokesperson for South East Water said the Drought plan details what actions the company would take to 'conserve water and secure customers' supplies, while balancing the needs of the environment'.

To make sure the drinking water company's plans are up-to-date, the actions are reviewed every five years and a draft document is published for consultation.

The updates include changes required by the new Drought Plan guidelines, including new actions to manage water resources in more severe drought events.

The South East Water spokesperson added: "Over the next five years, we are investing £2.1 billion to maintain supplies and build infrastructure resilience, including fixing leaks faster with smart technology, rolling out smart meters, and developing a new reservoir at Broad Oak near Canterbury.

"However, we must also be prepared for extended periods of dry weather placing pressure on our resources and increasing the demand for water. Our new draft Drought Plan outlines a flexible 'toolbox' of short-term actions to manage severe shortages, incorporating lessons learned from the 2025 drought."

Key updates include: refined trigger framework; proactive, localised communication; enhanced collaboration; targeted support; and extreme drought options.

South East Water's Head of Water Resources, Nick Price, said: "Water is our most precious resource and our supply area in the South East was identified by the Environment Agency as a water-stressed area nearly two decades ago.

SEW

South East Water has published its draft Drought Plan 2027–2032, which sets out the steps it would take during periods of drought or high demand.

"The drought of 2025 demonstrated how rapidly climate change and shifting post-pandemic demand patterns (such as changing working patterns) can strain our networks. During heatwaves, we now routinely see demand for drinking water increase by 20 to 30 per cent, the equivalent of adding a town the size of Maidstone or Eastbourne overnight on to our supply network.

"Our core challenge is maintaining a reliable supply to customers while protecting a highly sensitive local ecosystem that includes 196 Sites of Special Scientific Interest (SSSIs) and other precious water dependent habitats including chalk streams."

Feedback on the draft Drought Plan is invited via dedicated page: southeastwater.co.uk/draft-drought-plan

The consultation window is now open until August 6.