Southern Water input to Rother District Council's 2026 IDP review

Southern Water's service area is the southeast of England, including much of Hampshire, the Isle of Wight, East and West Sussex, and Kent. This area spans approximately 4,450 square kilometres and includes a mix of urban and rural locations.

In the UK water industry asset investment periods (AMP) are financed through 5-year business plans agreed through a regulatory process currently led by Ofwat. The current investment period is referred to as AMP8 and covers the years 2025 to 2030. AMP9 will be 2030 to 2035 and so on.

Through each UK water industry 5-year period, we work to identify the strategic asset investment priorities for the next 5-year investment period. Our work to produce the Drainage and Wastewater Management Plan (DWMP) and the Water Resources Management Plan (WRMP) are the main routes to assess and prioritise these types of strategic investment proposals.

Local network reinforcement required for the needs of a specific development is generally funded through an infrastructure charge applied to the water connection fees paid by the developer (unless, for example, a strategic network reinforcement programme is needed for a broader area – which can then be funded through strategic asset investment).

Growth data from different LPA sources (adopted local plans, 5-year housing land supply trajectories and individual consultation on planning applications) feeds into the various planning processes we use to identify the most appropriate strategic and/or local upgrades. These different growth data sources are illustrated in Figure 1 with the water company planning processes and investment timelines. Figure 1 is presented at the end of this document with further explanation.

Statutory water companies must undertake a series of checks and then plan investment in line with water industry funding routes and cycles. The planning system has a role in seeking to ensure the combined impacts of urban creep and climate change protect the quality of the water environment.

This is in line with paragraph 162 of the National Planning Policy Framework (NPPF, December 2024) where it states:

> *Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts.*

As there are a range of factors that together explain how Southern Water supports growth in the form of sustainable development, we provide more detailed information below set out under sub-headings for your ease of reference. We also set out our key investment plans for the Rother district within these sections.

Our policy on sustainable development is here https://www.southernwater.co.uk/media/ny0nb3qu/our-policy-statement-on-sustainable-development-a4.pdf

Please also see the National Standards for sustainable drainage issued by the Government in June 2025, available here – National standards for sustainable drainage systems (SuDS) - GOV.UK Southern Water outline guidance for SuDS here - https://www.southernwater.co.uk/our-region/sustainable-drainage-systems/ and more particularly within Source Protection Zones - https://www.southernwater.co.uk/media/ooubtggs/suds-in-spz-guidance.pdf

We offer a pre-planning enquiry service to developers here - https://www.southernwater.co.uk/building-and-developing/our-services/planning-your-development/pre-planning-enquiries/

Water supply and wastewater management:

There is a range of water industry regulations providing the framework water companies must work within, in addition to agreed guidance and methodologies followed for performance monitoring, assessment and business planning processes. Water utilities must plan and deliver enhancements in the most appropriate way, as determined by our experts in line with; water industry methodologies, Environment Agency consideration of impacts to the receiving environment, and Ofwat approval and funding mechanisms.

To support growth, Southern Water may need to provide additional infrastructure to serve new and existing customers or meet stricter environmental standards. Standards of wastewater treatment are determined by the Environment Agency through the environmental permitting process. Drinking water quality standards are determined by the Drinking Water Inspectorate (DWI) with the Environment Agency controlling abstraction of water from the sensitive groundwater source protection zones surrounding abstraction points.

Ongoing asset performance and environmental permit compliance monitoring feeds into our investment planning along with available growth and urban creep data, as well as many other key indicators included in developing the Drainage and Wastewater Management Plan (DWMP) and the Water Resources Management Plan (WRMP). We consult broadly on the DWMP and WRMP to help ensure that stakeholder input informs the development and implementation of these plans. Investment proposals prioritised through these are then fed into the next 5-year water industry business plan - Southern Water is now developing the next stage of the DWMP that will prioritise the wastewater asset investment proposals feeding into our AMP9 business plan (for the period covering 2030 to 2035).

Our AMP8 business plan is available here (we have provided the investment plans for https://www.southernwater.co.uk/media/wlgpppk3/srn-pr24-business-plan.pdf and https://www.southernwater.co.uk/our-region/improvements-in-your-area/ Our Clean Rivers and Seas Plan is here https://experience.arcgis.com/experience/09b43c8b9ebd4edb954f9da099405558/page/Page

Any infrastructure investment is planned, delivered and funded through two main mechanisms – one relates to local network reinforcement, the other to more strategic asset investment needs. To illustrate these two investment types please see the wastewater investment examples below:

- Any upgrades (reinforcements) that are needed on the network specifically to accommodate a new development, are funded through the infrastructure charge to developers. The infrastructure charge fee structure with sustainable development incentives is explained here https://www.southernwater.co.uk/media/3u1ni0eb/new-connection-charging-arrangements-24_25-v14.pdf
- Wastewater Treatment Works (WTWs) treat wastewater collected from homes and businesses within their catchment via a network of connecting pipes and pumping stations. WTWs are significant assets and represent strategic infrastructure. Upgrades to WTWs are funded through the water industry's 5 yearly investment planning – for which Ofwat approves the spending requirements for each 5 year period (AMP) based on customer generated income. The current investment period is referred to as AMP8 and covers the years from 2025 to 2030.

Wastewater Treatment Works capacity and Dry Weather Flow indicators:

We assess our treatment works (WTWs) annually for capacity against forecast growth using both Local Plan information and census/ONS data provided through a third-party population analysis. This feeds into both our 'within AMP' and 'longer term 5 yearly' planning processes. Every WTW operates in accordance with the EA permits designed to protect water quality. The volumetric permit sets the maximum Dry Weather Flow (DWF) that is permitted to recycle to the environment.

There are two main considerations for WTW capacity, treatment process capacity and dry weather flow (DWF) headroom. Process capacity is the WTW's ability to process crude wastewater influent to meet the quality parameters for final effluent discharge defined by the site's environmental permit. WTWs discharge to receiving waters under the permit issued by the Environment Agency. These permissions to discharge are granted through environmental permits. The EA sets limits on the quality and quantity of treated effluent from our works so that they do not cause an unacceptable impact on the environment. The flow that may be discharged in dry weather (the dry weather flow, or DWF) is one of these limits.

DWF headroom is the volume of final effluent permitted to be discharged in dry weather. DWF is generally used to communicate capacity as it better reflects the size of the WTW, whereas process capacity is more difficult to quantify as it can be defined in different ways depending on the parameter of quality measured. DWF is an indicator of average daily flow to a wastewater treatment works during a period without rain, recalculated annually - please see the further explanations of this indicator provided below.

Where future growth is projected to exceed the current DWF permit limit, Southern Water would apply for a change to the permit, requesting an increase in the DWF limit to serve the growth coming forward. At this point, the EA would normally also review the quality limits on the permit to ensure the total environmental load from the future proposed discharge remained appropriate for the receiving environment. This is in line with the "no deterioration" principle for environmental protection.

An amended permit might require investment at a wastewater treatment works - this is business-as-usual for water companies. As long as it remains possible for wastewater treatment technologies to achieve the Environment Agency's revised quality limits on a permit, then growth can be accommodated without deterioration in the environment. Upgrades to enhance treatment quality are determined by the Environment Agency as part of the Water Industry National Environmental Programme (WINEP).

Explaining Dry Weather Flow (DWF) and WTW headroom:

The measure of DWF capacity varies year-on-year based on the flows received at the WTW. To calculate DWF, a statistical method is applied to a rolling 3-year average of measured dry weather flow (DWF) each year, and therefore a particularly wet or dry year skew this capacity assessment in some years.

As any numeric interpretation of DWF is subject to change each year (with fluctuations in prevailing conditions, this means that DWF is a broad indicator of headroom that cannot be interpreted literally – these numbers are conservative indicators, not absolute limits to growth. Southern Water's process experts therefore also monitor WTW performance to other quality criteria and consider this alongside the DWF indicators in prioritising investment.

The initial step in Southern Water's annual WTW headroom assessment involves calculating the DWF. We use the average of the last 3 years' reported annual average Q80* DWF values (calculated from recorded daily flow measurements for a WTW - these can be influenced by ground water infiltration and/surface water inundation on the catchment). Then subtracting this 3-year average volume from the DWF permit limit gives us the 'headroom' estimate as a volume.

*Q80 DWF is defined as the total daily flow value that is exceeded by 80% of the total daily flow values in a period of twelve months (the 80%-exceeded flow, or Q80) measured in cubic metres.

We then typically convert this volumetric figure to a number of properties. We do this on the assumption that each property contributes 500l wastewater per day. This approach was agreed with the Environment Agency for planning purposes. However, this 500l wastewater per property is a somewhat inflated figure* - which also means that any number of properties communicated in

relation to DWF headroom remains a broad estimate, and not an exact limit that could be interpreted as a constraint to growth.

**The 500 lppd was originally used by the Environment Agency and agreed with Southern Water for use in planning purposes. It was originally based on an occupancy of 2.4 persons per household consuming 200 litres per person per day in part to include an allowance for employment development, public buildings and other unaccounted flows. Given water metering has brought average use figures down from this 200lpppd, and that Building Regulations now support a much lower water consumption target in our water stressed region, the actual volume of wastewater generated by each new home is likely to be much lower than the 500lppd used in our 'by-property headroom' calculations.*

Wastewater Treatment Works and Nutrient Neutrality:

The full extent of Southern Water's AMP8 investment in nutrient removal is provided through the WINEP schemes agreed by the Environment Agency per water industry investment period (current AMP8 is from 2025 to 2030).

For further information, please see the Government Policy Paper on Nutrient Neutrality here: Nutrient pollution: reducing the impact on protected sites - GOV.UK Under the Levelling Up and Regeneration Act 2024, the Government has placed a requirement on water companies to improve any nutrient significant plants by 31 March 2030 to ensure they operate to the highest Technically Achievable Limit (TAL). The full list of designated Nutrient Significant Plants is here: Information about nutrient significant plants - GOV.UK.

We provide below plans for the current AMP8 (2025 to 2030) investment period. Additional to the schemes listed, capital maintenance continues across multiple assets and locations to enhance resilience and safeguard asset life. Additional network growth schemes will be confirmed as the designs come forward further to network modelling.

Key AMP8 Water Industry National Environmental Programme (WINEP) investment in strategic wastewater assets:

Wastewater Catchment	Scheme Type/ Driver	Outline	Estimated AMP8 Investment	IDP Section
Wallcrouch WTW	WINEP (Sanitary & Chemical)	AMP8 process enhancement needs to be defined further	£1.2m	Utilities Infrastructure
Wallcrouch WTW	WINEP (Nutrients)	Possible nature based solutions to be further defined.	£1.2m	Utilities Infrastructure
Battle WTW	WINEP (Chemical)	AMP8 process enhancement for chemical removal	£3.6m	Utilities Infrastructure
Burwash Common WTW	WINEP (Nutrients)	Nutrient removal of phosphorus to the lowest Technically Achievable Limit (TAL)	£1.6m	Utilities Infrastructure
Ferry Hill Winchelsea WTW	WINEP (Nutrients)	Nutrient removal of phosphorus to the lowest Technically Achievable Limit (TAL)	£4.6m	Utilities Infrastructure
Guestling Green WTW	WINEP (Nutrients)	Nutrient removal of phosphorus to the lowest Technically Achievable Limit (TAL)	£4.9m	Utilities Infrastructure

Wastewater Catchment	Scheme Type/ Driver	Outline	Estimated AMP8 Investment	IDP Section
Icklesham WTW	WINEP (Nutrients)	Nutrient removal of phosphorus to the lowest Technically Achievable Limit (TAL)	£4.5m	Utilities Infrastructure
Staplecross WTW	WINEP (Nutrients)	Nutrient removal of phosphorus to the lowest Technically Achievable Limit (TAL)	£3.3m	Utilities Infrastructure
Westfield WTW	WINEP (Nutrients)	Nutrient removal of phosphorus to the lowest Technically Achievable Limit (TAL)	£3m	Utilities Infrastructure
Winchelsea Beach WTW	WINEP (Nutrients)	Nutrient removal of phosphorus to the lowest Technically Achievable Limit (TAL)	£5.3m	Utilities Infrastructure
Stubbs Lane Brede WTW	WINEP (Nutrients)	Nutrient removal of phosphorus to the lowest Technically Achievable Limit (TAL)	£5.9m	Utilities Infrastructure
Fairlight WTW	WINEP Quality (Sanitary)	AMP8 process enhancement for tightening of sanitary permit parameters	£0.7m	Utilities Infrastructure
Ticehurst WTW	WINEP Quality (Sanitary)	AMP8 process enhancement for tightening of sanitary permit parameters	£12.3m	Utilities Infrastructure
Burwash Common WTW	Regulatory Full Flow to Treatment permit increase	Increased treatment capacity (also reducing risk of storm overflow release)	£0.8m	Utilities Infrastructure

Please note that project plans and delivery schedules can be subject to change, in line with the risks emerging throughout each 5 year investment period.

Water efficient development:

Higher standards of water efficiency in new development will equate to greater long-term sustainability – with the potential to delay or reduce the need to increase water abstraction, which in turn will help to minimise the impacts on the environment. Demand management is a key aspect of water industry strategy for water resources and therefore should also be a core principle underpinning the water supply sections of Local Plan infrastructure planning.

Water efficiency can also help to reduce the average daily flow of wastewater into the network, particularly where greywater recycling systems are used as a means of increasing water efficiency. Greywater recycling therefore offers a mitigating solution for the impacts that significant increases in housing is likely to have into the future.

Tackling water scarcity requires a multi-faceted approach and there is an opportunity for the planning system to play a part by ensuring new development meets the highest standards of water efficiency possible at the time.

The National Planning Policy Framework (NPPF, December 2024) requires that:

> *161. The planning system should .. take full account of all climate impacts including overheating, water scarcity.. It should help to: shape places in ways that .. minimise vulnerability and improve resilience; encourage the reuse of existing resources..*

Southern Water is committed to help customers reduce personal consumption to an average of 100 litres of water per person per day by 2040, and reduce business demand by 9% by 2037. This is appropriate to the 'serious water stress'[1] status of the South East. Southern Water is encouraging developers to meet or exceed this target by reducing the new connection charge for water efficient development - https://www.southernwater.co.uk/media/3u1ni0eb/new-connection-charging-arrangements-24_25-v14.pdf

Water is a precious resource. Every year the population of the South East grows, but the amount of available water remains the same. Due to climate change and population growth, unless we do something differently, the Environment Agency estimates that we would need an extra 2.5 billion litres of water a day in the South East alone by 2050[2] in order to keep up with demand.

[1] Water_stressed_areas___final_classification_2021.odt (live.com)

The South East is facing a future of more people and less water. Action is needed to ensure there's enough of this precious resource to go around. It may seem like there's an endless supply, but around 97% of the planet's water is saltwater. Of the remaining 3% that's freshwater, around 2% is stored in glaciers, ice caps and snowy mountains – leaving only 1% in rivers, lakes and underground sources. This 1% has to be shared between people, plants and wildlife.

[2] A summary of England's revised draft regional and water resources management plans - GOV.UK

The Environment Agency has identified that by 2050, almost 5 billion extra litres of water would be required every day to maintain public water supplies in England. Half of that need is in the South East. The main driver in the South East is what the Environment Agency defines as "Environmental Destination" which means the need to improve and enhance the natural world. We need to improve the environment by taking less for public supplies whilst also catering for high levels of population growth and planning for climate change and future droughts.

Taking more water from rivers, lakes and underground sources would be harmful to wildlife, so we need to look at ways of using water wisely to help us limit the amount we take from the environment for public supplies. Using water wisely means minimising leakage from pipes and maximising water efficiency in homes and businesses but it also means looking at new ways of using the water we have available.

This includes the highly treated wastewater that, currently, we waste by pumping it out to rivers or the sea – only to take it again further along the water cycle to be treated and supplied to customers. Southern Water plans to take some of our treated wastewater and use advanced treatment techniques to turn it into purified recycled water that can be used as a safe and sustainable source for drinking water supplies. This approach has been used around the world in countries including Australia, Singapore and the USA for more than 40 years.

Key investment in strategic water assets:

We tabulate below the longer-term plans shared in the Water Resources Management Plan (WRMP). Capital maintenance also continues across multiple assets and locations to enhance resilience and safeguard asset life. Longer-term plans for water asset investment strategy, in addition to targeting water resource conservation and efficiency outcomes, include:

- Ending the use of all supply-side drought permits/orders by 2041, unless faced with a drought of more than 1-in-500 year severity.
- Continuing temporary use bans and non-essential use bans to manage demand during drought.

Water Supply Zone / Area	Scheme Type/ Driver	Outline	Estimated AMP8 Investment	IDP Section
Rye Wells	Future Resource	Reconfiguration providing up to 1.5Ml/day by 2040	TBC	Utilities Infrastructure
Darwell Reservoir	Future Resource	Conjunctive use with recycled water from Hastings providing up to 6.8Ml/d by 2051	TBC	Utilities Infrastructure
Rye	Future Resource	Bulk import to provide up to 10Ml/d by 2050	TBC	Utilities Infrastructure
All regions	Water efficiency	(AMP8 – AMP12) Smart metering rollout and other water efficiency programme measures to reduce demand by 37.4Ml/d by 2049-50	TBC	Utilities Infrastructure
All regions	Leakage Programme	Implementing leakage reduction measures from 2025-26 (AMP8) to reduce leakage by 10.9Ml/d by 2049-50 (AMP12)	TBC	Utilities Infrastructure

Please note that project plans and delivery schedules can be subject to change, in line with the risks emerging throughout each 5 year investment period.

Surface water management in climate resilient communities:

As some locations may offer more inherent potential for sustainable development than others, we would like to see active place making approaches that incorporate the range of mitigating measures most appropriate to the context of each community's resilience to climate change into the future. This would support sustainable infrastructure planning for growth.

This is supported by paragraph 7 of the NPPF where it states that; *the purpose of the planning system is to contribute to the achievement of sustainable development, including supporting infrastructure in a sustainable manner.*

Climate change is expected to have an impact on the risk of flooding in several wastewater systems[3]. Preventing surface water from entering the foul and combined systems during heavy rainfall is the most sustainable and cost-effective way to reduce releases from storm overflows[4].

[3]Through our work with stakeholders on the 2023 Drainage and Wastewater Management Plan*, we identified there will be a high flood risk for some catchments by 2050 unless measures are taken to manage and reduce the risk. The key issues behind the future changes in risk include:

- climate change - including the increasing frequency and severity of droughts and storms. The rainfall entering public sewers can lead to releases from storm overflows, sometimes even after storms have subsided. The management of groundwater and surface water is a multiple agency responsibility, with local authorities managing the flood risk from these sources.
- customer behaviour - including issues such as sewer blockages (that can increase the likelihood of storm overflows) and the use of environmentally degrading materials such as chemicals, pesticides and plastics.
- growth and urban creep - https://www.southernwater.co.uk/media/pnohvfbe/b0054-technical-summary-growth-and-creep.pdf

[4] Most UK sewers were designed for the communities when the houses were built. The combined effects of climate change and development now place huge pressure on these systems, and the in-built pressure release

valves known as storm overflows are discharging more often. Upscaling sewer networks to then pump increasing volumes of rainfall run-off through processes not required to treat it is unsustainable. This route also ultimately directs rainfall out to rivers and seas, rather than sustaining groundwater resources through the natural water cycle in our already water-stressed local environment.

We need to tackle the problem, not by digging up the roads everywhere and replacing all the pipes, particularly in congested urban areas, but by tackling the issue at source in a more sustainable and affordable way. Together, we need to separate rainwater from wastewater.

The 2025 National Standards for Sustainable Drainage provides a hierarchy of discharge routes whereby rainwater and surface water should first be harvested for non-potable re-use, prior to infiltration solutions where these are practicable, with discharge to the combined sewerage system a last resort. The hierarchy does not allow surface water to connect to the foul sewer network. Southern Water will also resist new connections of surface water to the combined sewer in line with our surface water management policy here:

https://www.southernwater.co.uk/media/l23dbon0/surface-water-management-policy-120724.pdf

As Defra's Storm Overflows Discharge Reduction Plan sets out - *Water companies must remove rainwater from the combined sewer system as part of effectually draining their areas. This should include limiting any new connections of surface water to the combined sewer network, and any new connections should be offset by disconnecting a greater volume of surface water elsewhere within the network.*

We are investing heavily in work to reduce releases in part by removing existing connections of surface water to the combined and foul networks. However, even as we deliver this work, development[5] continues to increase surface water run-off in those areas. Climate change impacts demand that Local Plans provide for a re-think and re-design[6] of communities, for example by;

- Active place making at an early stage to help ensure the measures necessary for climate change resilience are included in development proposals to best meet the current and future needs of the surrounding community.
- Designing to reduce the flow and volume of rainwater run-off from new development and encouraging infiltration to support the natural water cycle. This is in line with the NPPF[7] paragraphs 11, 162, 170 and 172.
- Encouraging innovative design solutions to offset the impacts of higher density development - for example grey-water recycling and green roofs.
- Requiring the incorporation of the most effective range of solutions to support the long-term resilience of each community - place making for climate change resilience is one way to achieve this.

To support climate resilient communities in the face of increased scale and pace of growth, given the urban creep generated by development tension could arise initially across local network capacity, before it becomes a concern for more strategic assets. The implementation of policy supporting SuDS and tighter water efficiency standards can help to address this tension, as well as reduce longer-term impacts on water resources.

[5]During heavy rain, local sewer networks' drainage capability can be exceeded by the amount of rainwater that enters the network. Under these conditions, storm overflows can then release excess flows through outfalls into rivers and the sea to prevent flooding of homes and businesses. Storm overflows are part of the network's original design and are regulated by the Environment Agency. Over time, the expansion of urban settlements as well as 'urban creep' (home extensions, conservatories and paving over front gardens for parking) have incrementally added to the amount of rainwater entering sewers, increasing reliance on network pressure release via storm overflows. As stated in Water UK's 21st Century Drainage Programme*;*

- *"The country's built environment is constantly changing and "urban creep" – home extensions, conservatories and paving over front gardens for parking – can all add to the amount of water going into our sewers and drains. Green spaces that would absorb rainwater are covered over by concrete and tarmac that will not. In fact, studies show that "urban creep" results in a larger increase in predicted flooding than new housing, because it adds more rainwater to these systems'.*

- At times of low rainfall and in dry conditions the sewerage system generally has the capacity to convey household wastewater and is therefore adequate for what it was principally designed for – to drain and pump wastewater on to treatment works. However, the combined effects of climate change and urban creep now mean that the additional flows draining to the wastewater network from groundwater and surface water run-off can occupy a high proportion of the networks capacity (up to 97% of capacity in some catchments during storm periods). This can result in the sewer not being able to convey foul flows onwards for treatment. This problem needs to be tackled at source, by separating rainwater flows from wastewater. The management of groundwater and surface water is a multiple agency responsibility, with local authorities managing the flood risk from these sources. a greater emphasis should be placed on the importance of managing surface water and ground water effectively in communities. For more information on Southern Water's work, and the root causes of releases from storm overflows, please see – https://www.southernwater.co.uk/our-region/clean-rivers-and-seas-task-force/pathfinders/ https://www.southernwater.co.uk/our-performance/storm-overflows/storm-overflow-task-force

[6] The complexities and challenges of drainage need a collaborative approach between the responsible organisations, such as Local Authorities, Southern Water, the Environment Agency and community groups to adapt the urban environment to be more resilient to our changing weather patterns. We need planning policy to ensure sustainable development and place-making for resilience to the impacts of climate change in order to future proof our communities from flood risk.

Retrofitting sustainable drainage solutions can be challenging, but Southern Water is establishing examples* of simple systems that could also be implemented by communities, in addition to looking at the design of new development proposals. Public examples of sustainable urban drainage approaches, for example with permeable paving or slow-draining garden water butts, would help to mitigate flood risk locally and may also help to create the shift in awareness and mindset needed to ensure we all work together to address the impacts of climate change into the future.
* https://www.thetimes.co.uk/article/water-butts-stop-storm-overflows-spewing-out-sewage-clean-it-up-f2qx66z7v

Such additional sustainable drainage solutions could also be funded through community infrastructure levy (CIL) for example to address surface water drainage from:

1. urban creep to-date, where past development and run-off from impermeable surfaces increased surface water run-off, increasing localised flood risk, and
2. new development on sites where fewer on-site sustainable drainage options are possible, and off-site schemes are needed to address flood risk in the area.

[7]Further NPPF references:

11. Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change and adapt to its effects.

Key surface water management investment in to reduce releases from storm overflows:

As the summary of AMP8-AMP9 plans below shows, Southern Water is investing heavily in work to reduce releases from storm overflows. However, even as we deliver this work, development can be allowed to continue to increase surface water run-off in those areas.

b) Wastewater Catchment	Scheme Type/ Driver	Outline	Estimated AMP8 Investment	IDP Section
Fairlight	WINEP overflows	Root-cause spill reduction achieved through enhanced surface water management (combination of increased storm tank capacity solution and SuDS)	£5.7m	Schemes will split across Utilities Infrastructure and Community based flood mitigation infrastructure
Hastings Bexhill	WINEP overflows	Root-cause spill reduction achieved through enhanced	£7.4m (with a further £7m into AMP9)	Schemes will split across Utilities Infrastructure and

b) Wastewater Catchment	Scheme Type/ Driver	Outline	Estimated AMP8 Investment	IDP Section
		surface water management (combination of increased storm tank capacity solution and SuDS)		Community based flood mitigation infrastructure
Mill Corner Northiam	WINEP overflows / other (targeting)	Root-cause spill reduction achieved through enhanced surface water management (combination of increased storm tank capacity solution and SuDS)	£1.6m	Schemes will split across Utilities Infrastructure and Community based flood mitigation infrastructure
Quickbourne Lane Northiam	WINEP overflows / other (targeting)	Root-cause spill reduction achieved through enhanced surface water management (combination of increased storm tank capacity solution and SuDS)	£0.2m (with a further £3.2m into AMP9)	Schemes will split across Utilities Infrastructure and Community based flood mitigation infrastructure
Stubbs Lane Brede	WINEP overflows / other (targeting)	Root-cause spill reduction achieved through enhanced surface water management (combination of increased storm tank capacity solution and SuDS)	£0.3m (with a further £4.3m into AMP9)	Schemes will split across Utilities Infrastructure and Community based flood mitigation infrastructure
Westham	WINEP overflows / other (targeting)	Root-cause spill reduction achieved through enhanced surface water management (combination of increased storm tank capacity solution and SuDS)	£11.3m	Schemes will split across Utilities Infrastructure and Community based flood mitigation infrastructure
Westfield	WINEP overflows / other (targeting)	Root-cause spill reduction achieved through enhanced surface water management (combination of increased storm tank capacity solution and SuDS)	£0.3m (with a further £3.9m into AMP9)	Schemes will split across Utilities Infrastructure and Community based flood mitigation infrastructure

Please note that project plans and delivery schedules can be subject to change, in line with the risks emerging throughout each 5 year investment period.

Data needs to support the increased scale and pace of growth

As illustrated by Figure 1 below, where consulted, Southern Water will assess capacity for proposed development at local plan stage and re-assess capacity during the planning application

process. In addition, we monitor local authority 5-year housing land supply data feeding this into our asset investment planning processes.

Where we are consulted on planning applications (please see dataset '2' in the illustration provided by Figure 1 below) the following steps then apply:

1. Planning applications are submitted by developers to the LPA, and Southern Water is consulted (not statutory) – at this point we undertake detailed modelling.
2. Where this modelling re-confirms that reinforcement of the network is needed, developments are conditioned by the LPA – typically conditions state 'no occupation until capacity is available' but there may be a level of occupation that could be accommodated directly, if Lewes seeks to condition on that basis by working with Southern Water.
3. Developer provides build out rates.
4. Asset strategy review options for network upgrades to provide capacity in the network.
5. Development starts.
6. Developer applies to connect.
7. Occupation once capacity is available.

All LPA data provided as 5-year housing land supply trajectories is accounted for alongside other population growth estimates in our business planning processes for strategic asset investment (please see dataset '3' in the illustration provided by Figure 1 below). Population growth estimates are drawn from adopted local plans. Data from planning applications provides clear evidence of the growth coming forward each year from the local plans – planning certainty provides the strongest evidence to support our strategic investment proposals. Ofwat reviews the evidence we present to justify our investment proposals.

As indicated by our illustration in Figure 1 below, any new growth data linked to evolving local plans, and therefore yet to be confirmed through local plan examination and adoption processes, is accounted for in future 5-year water industry investment cycles once the growth proposals are formally accepted as part of an adopted local plan (please see dataset '1' in the illustration provided by Figure 1 below).

To best support our investment planning, water companies ideally need routine shares of housing trajectories in readily usable formats including the geospatial data we need to link growth to our catchment and asset service boundaries. Tension can arise where housing trajectories are not appropriately updated, or where new housing is progressed outside of Plans as 'windfall'. To assist in these scenarios then, as stated above, where consulted Southern Water will also assess capacity to serve individual development sites at planning application stage. Should our assessment identify a constraint of some kind, we will plan the work necessary to serve that development working with the developer on timings.

It is the granting of planning permission and the developer applications to connect that confirms and funds our more detailed planning for any local network interventions that may be needed.

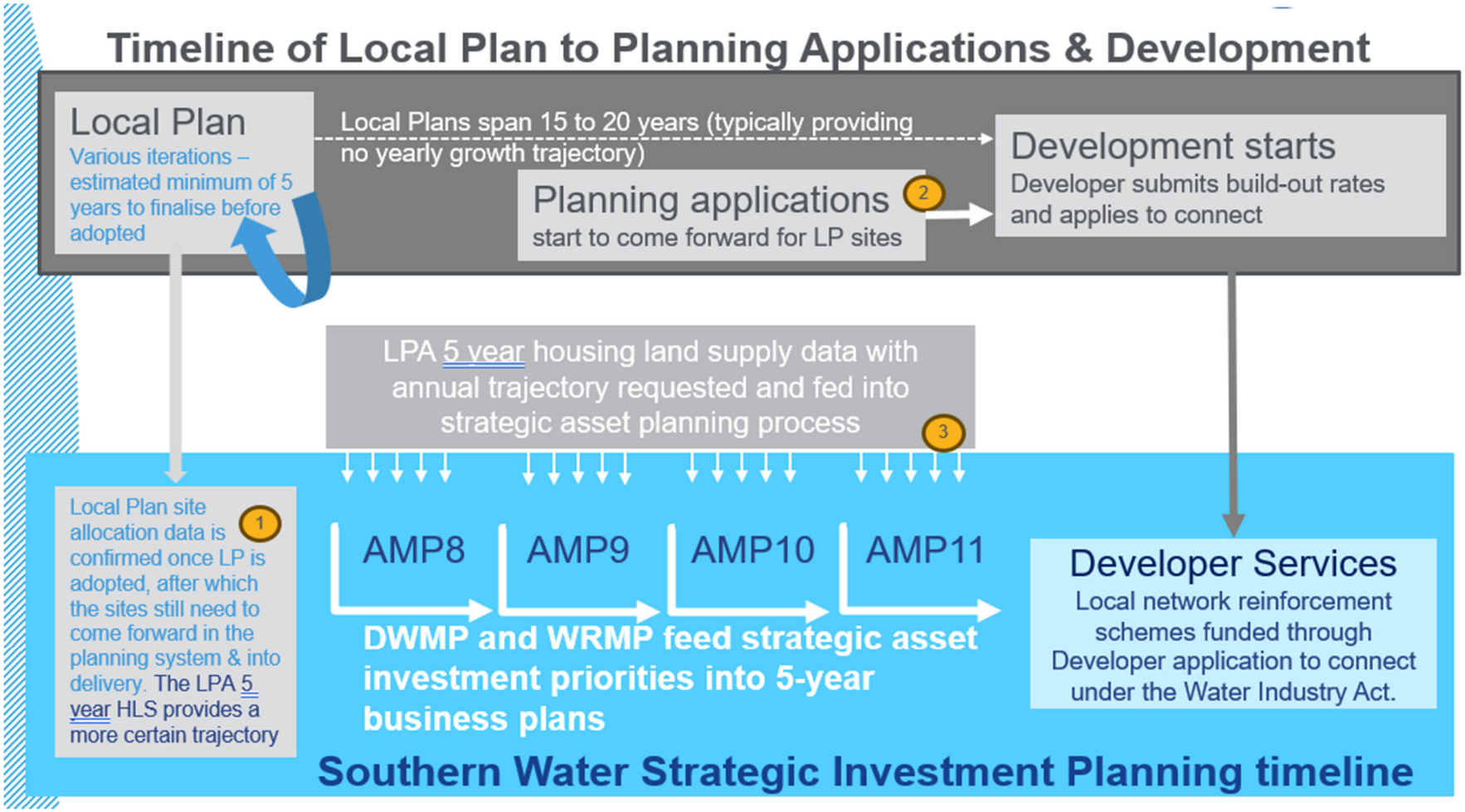

Figure 1 - the 3 key sources of growth data that feed into different asset investment processes