

25 March 2026



Our Reference: SEW Response\_RLP\_25/03/26  
Your Reference: Rother Local Plan

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Dear Sir/Madam,

**Proposal: Rother Local Plan Consultation**

South East Water would like to thank Rother District Council for bringing the draft Rother Local Plan consultation to our attention.

Water Resources Planning

Each water company is legally required to prepare a Water Resources Management Plan (WRMP) every five years. South East Water published our latest WRMP in October 2024 (WRMP24). This plan sets out how we intend to maintain the balance between increasing demand for water and available supplies over the next 50 years up to 2075. The plan takes into account planned housing growth as well as measures to ensure environmental protection and improvement, and the expected impacts of climate change. It also includes our ambitious water efficiency and leakage reduction programmes. For more information please visit our website: [South East Water - Water Resources Management Plan 2024 2025 - 2075](#)

In South East Water's most recent business plan, 2025-2030 we have committed to play an active role regionally in relation to the impact of housing growth on water. We are committed to work with local stakeholders – appreciating the balance of supplying water, the need for society to ensure environmentally sustainable future water resources, and also the ongoing support of the South East region and its economic development. South East Water aims to respond to 100 per cent of all national, local and regional authority consultations and seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply infrastructure. Please see our latest business plan: [South East Water - Business Plan 2025 - 2030](#)

We are also committed partners in the Water Resources South East (WRSE) Group that works for the collective good of customers and the environment in the South East region and also within the wider National Framework for long-term water resources planning.

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## Housing Growth

From a wider review of the latest housing forecast figures, which have been increased to meet government targets and provided to us by local authorities within our supply area, we have identified that in some areas it is challenging to accommodate additional growth beyond what was assumed in our Water Resources Management Plan 2024 (WRMP24). These are areas where there is limited or no planned available supply-demand surplus. Our WRMP24 was prepared using housing trajectory data in 2023 and is based on housing figures derived from best available information published at the time. Consequently, it does not reflect the significant uplift in the Objectively Assessed Housing Need (OAHN) that is now driving draft Local Plans.

In the Rother area, it is unlikely we would be able to accommodate growth exceeding our WRMP24 forecast assumptions throughout the planning period. We have noted a total housing need figure of 15,504 dwellings and a housing target of 8,427 dwellings within your draft local plan for the period 2024 to 2042. Within WRMP24, South East Water and Southern Water have assumed a total of 6,869 dwellings across the same time period. However, we will be updating our growth forecast for Water Resources Management Plan 2029 (WRMP29) over the next couple of years which is an opportunity to ensure we can support the updated housing growth targets in our next plan.

We have yet to receive yearly housing trajectory forecasts from Rother District Council and we would welcome sight of this information to inform our assessments and comparison against our WRMP24 assumptions. If possible, please could you break down your forecast to those properties included within our supply area<sup>1</sup> and show how the overall yearly figures are apportioned between:

- Planning consent = those dwellings with existing planning consent [for longer term (post 2031/32) the number may be windfall rather than with actual permission now].
- Adopted LP and NP = those dwellings within allocations in your adopted plan that don't have planning consent
- Draft LP = those dwellings in proposed allocations (draft Reg 18 consultation) that don't have planning consent)

For your information, the Environment Agency's current timetable for water companies to publish a Resource Position Statement, setting out the high level forecasts our WRMP29 will be based upon, is May 2027. Our draft WRMP29 is then scheduled to be submitted in March 2028. Based on these dates, we will have developed our new baseline demand forecast (including the most up to date housing projections) by spring 2027 and identified our proposed interventions to address any deficits a year later in spring 2028.

## Population Density & Growth

Plans should include consideration of the wider impact with regards to people movement and population growth when understanding the impact on resources, for example seasonal variations from workforce, students, and visitors that would also need consideration in wider plans such as supporting future WRMPs and providing better predictive insight into future demand.

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<sup>1</sup> Our supply area boundaries and water resource zone shapefile are available to download here - <https://www.southeastwater.co.uk/about/resources/publications/water-resources-bidding-market/>

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### New Water Supplies and Infrastructure Development

To support existing customers and future developments within South East Water's supply area, more specifically, within our WRZ3 (Eastbourne) water resource zone, there are several planned schemes included within our most recent Business Plan to improve our interconnectivity, resilience levels, water quality and the environment within the area such as:

- New infrastructure in the area to accommodate upgrades at Bewl WTW and changes to operation of the Bewl to Darwell transfer.
- Mains reinforcement at Telham.
- Upsizing of our service reservoir at Standard Hill.

We will also carry out work at a localised level based on growth and new developments once known within the area. We would encourage early consultation and consideration with utilities whether statutory or non-statutory for inclusion on resilience challenges in the areas being proposed for water availability and movement of water.

As applications are made through our developer enquiry process, we will work with local authorities and developers to carry out the appropriate detailed network modelling assessments that are necessary. This will ensure that infrastructure reinforcements are delivered (to move water to where it is needed at a development level) ahead of the occupation of developments. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. We are therefore committed and willing to ensure engagement and communication at the earliest opportunity.

### Demand Management

Our aim of reducing average household consumption to reach our per capita consumption (PCC) ambition of 110 litres per person per day by 2050 requires the use of new approaches and technology, including smart metering. The savings are stretching and will be challenging to deliver especially given the impacts that affluence, temperature and rainfall have on our regional water use.

It is recognised that, if we work in isolation, it is unlikely we will be able to achieve the PCC targets included in our forecast. Our ambitious water efficiency strategy, alongside the water labelling of all water using products (already committed to by the government), will achieve the forecast PCC reductions required in the shorter term. Longer term we have made assumptions that wider initiatives will drive water efficiency, and examples include mandated water labelling (with minimum standards), stricter mandated building codes, design and regulations as well as national water efficiency messaging, policies and targets. We would like to proactively engage with all local planning authorities in our supply area, to embed our strong commitment to reducing household consumption (as required within our WRMP) into your long-term plans.

An industry report, published in 2024, which aims to inform the Government's roadmap for water-efficient new homes sets out a roadmap to target lower PCC for new housing in water-stressed areas like ours, aiming for 100 litres per person per day by 2025, 90 litres by 2030, and 80 litres by 2035. You can view the report here: [Water Ready A report to inform HM Government's roadmap for water efficient new homes](#). We fully support this ambition and encourage local authorities to adopt these targets within strategies where possible.

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South East Water strongly supports any commitment to sustainable design of new residential and commercial development. South East Water recommends the need for mandatory housing standards for water use which would support water efficiency in new buildings and promote collaboration between councils and developers. Sustainable design standards for all residential and non-residential developments, including water use standards, should be a focus for developers as well as a monitoring responsibility for councils.

South East Water is keen to discuss future collaboration opportunities with Rother District Council to progress water efficiency initiatives or proof of concept trials etc that can benefit customers within the area. We fully support local authorities and developers that seek to deliver PCC reduction through solutions such as greywater and rainwater harvesting. Another recent report published by the Good Homes Alliance provides a design guide for Water Efficiency and Reuse in Housing for developers. We are keen to ensure that local authorities are aware of this report and are willing to work with you (and developers) if any support is needed. Please see the link: [Water Efficiency and Reuse in Housing](#)

Future plans should incorporate methods to validate developer claims regarding water efficiency in new developments, specifically aiming to confirm that the target of 110 litres per person per day (or lower) is achieved. This data is crucial for assessing the effectiveness of current approaches, identifying the need for further user behavioral change or compliance, and understanding the impact of other factors like pets, jet washing, or hot tubs on water consumption. The absence of this information currently hinders effective future planning and resource management.

#### Source Protection

We urge local planning authorities to take into account the Environment Agency's groundwater source protection zones (SPZs) to safeguard drinking water in the planning process. Any development within these areas must mitigate pollution risks. The South East region is already classified as water-stressed, which renders the protection of these sources even more critical to secure future drinking water supplies in the region and prevent any supply loss due to contamination. Over 70 per cent of the water we supply comes from groundwater sources (over 250 boreholes and wells). Groundwater also keeps many of our rivers flowing and helps maintain good water quality in these rivers. Contamination of groundwater sources can be very difficult and time consuming to clean up. It is, therefore, incredibly important that we all work together to ensure that groundwater sources are protected.

SPZs are determined on the time it takes for a pollutant to travel from below the water table to a source of supply. SPZs indicate contamination risk: the closer an activity (e.g., storing petrol underground, septic tank soakaways) to a source of supply, the greater the risk. The Environment Agency uses models to determine groundwater travel time to the source and the necessary protection area.

SPZs are designated to prevent groundwater contamination by controlling activities around water abstraction points. They are divided into four zones (SPZ1 being closest to abstraction), with increasing restrictions necessary closer to the source. For example, septic tanks are prohibited in SPZ1. Government planning guidance also stresses the need to avoid polluting developments near drinking water supplies.

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**SPZ1 (Inner Zone):** The area immediately surrounding an abstraction point for domestic or food production supply, most vulnerable to pollution. It is defined as either within 50 meters of the abstraction point or the area where groundwater takes up to 50 days to reach it, whichever is the larger area.

**SPZ2 (Outer Zone):** The area around an abstraction point for domestic or food production supply, defined as:

- Within 250 meters if the daily allowable volume is less than 2,000 cubic meters (authorized by abstraction licence or small quantity right).
- Within 500 meters if the daily allowable volume is 2,000 cubic meters or more (authorized by abstraction licence).
- The area where groundwater takes up to 400 days to reach the abstraction point.
- The largest of these areas applies.

**SPZ3 (Total Catchment):** The entire area where groundwater eventually flows to the abstraction point, potentially extending far from the source.

Extended zones (1c, 2c, 3c): These zones include areas with protective geology (e.g., clay) where activities like deep drilling could create pollution pathways.

**SPZ4 (Zone of Special Interest):** Areas requiring additional protection due to local conditions.

Additional information relating to SPZs is provided at the end of this letter.

Regrettably, water companies like South East Water, are not statutory consultees for planning. However, we would like to work with local authorities, as well as the EA, to ensure that SPZs are routinely considered in planning decisions to safeguard water supplies in your local area. We also encourage you to consider the risks to groundwater from activities which might pose a risk such as the redevelopment of brownfield sites with an industrial legacy and wastewater treatment solutions that incorporate reed beds or soakaways as part of the treatment process.

South East Water would like to be kept updated with any developments relating to the Rother Local Plan, using the following mailbox: [planning@southeastwater.co.uk](mailto:planning@southeastwater.co.uk). We look forward to working with Rother District Council to ensure that drinking water supplies remain protected in the area in the future and welcome the opportunity to collaborate to achieve growth objectives in a sustainable way.

If you require any further information or have any questions about this letter, please do not hesitate to contact me via the above email address.

Yours sincerely,

The Planning Team

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## South East Water

### Information on SPZs can be found here:

- Source Protection Zones in your area can be found online:  
<https://magic.defra.gov.uk/MagicMap.aspx>
- Information on SPZs can also be found on the government website:  
<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>
- Environment Agency Technical Guidance -  
<https://assets.publishing.service.gov.uk/media/5d41a020e5274a0a0bf7757c/Manual-for-the-production-of-Groundwater-Source-Protection-Zones.pdf>
- Environment Agency position statements (including information on restricted activities)  
<https://www.gov.uk/government/publications/groundwater-protection-position-statements>
- Environmental Protection Act 1990:Part 2A, Contaminated Land Statutory Guidance -  
<https://assets.publishing.service.gov.uk/media/5a757dfa40f0b6360e47489d/pb13735-cont-land-guidance.pdf>

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