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Principal Policy Officer (Planning)
Corporate Policy and Strategy
Canterbury City Council
Military Road
Canterbury
CT1 1YW

03 June 2024

Our ref: SEW/CCCLP24/01

Subject: South East Water Response to Draft Canterbury District Local Plan to 2040

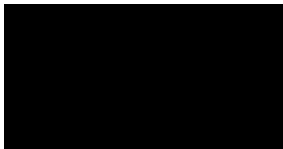
Dear Lauren,

We are grateful for the opportunity to comment on Canterbury City Council's revised Draft Local Plan to 2040.

Please find enclosed our responses to selected questions in the Draft Local Plan to 2040 consultation questionnaire. Our responses focus on policies we deem to be of key relevance to South East Water's demand management and supply side intervention proposals for future water security in Kent, with particular reference to our proposals for a new winter storage reservoir and associated infrastructure at Broad Oak (Draft Policy R17). For reference, we also previously provided comments on your '*Our future district (2020)*', '*Draft district vision and Local Plan options (2021)*' and '*Regulation 18 draft Canterbury district Local Plan (2022)*' consultation documents.

I trust the responses contained within are helpful in assisting your preparation of the Local Plan for Canterbury District and if there any other ways we can assist, or if you have any queries on our representations, please do not hesitate to contact me.

Kind regards,



Nick Price
Head of Water Resources
South East Water

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CONSULTATION QUESTIONNAIRE

CHAPTER 1: SPATIAL STRATEGY FOR THE DISTRICT

Policy SS1: Environmental strategy for the district

You will need to read the policy [here](#) before answering this question.

3. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water supports that 'new developments of 300 homes or more should [...] contribute to floodplain management'.

We consider that the policy should support the development of zero water use for properties through measures such as greywater reuse and rainwater harvesting.

South East Water strongly supports the provision for a '440ha Broad Oak Reservoir' within policy SS1. We feel it is important that reference is made to the necessary ancillary infrastructure required to deliver the new reservoir, including a new water treatment works and pipeline to an abstraction point from the Great Stour. Please also refer to our response to Policy R17.

South East Water also support the protection, maintenance and enhancement of the network of green and blue infrastructure - including rivers, streams and ponds - in the district, which provides important habitats, valued landscapes and spaces for recreation and which supports our health and wellbeing. It is also essential for the replenishment of water resources through effective rainfall.

South East Water supports the Council's commitment to work with its partners to support and sustain the full recovery of the Stodmarsh Nature Reserve designated site and to meet its targets for water quality and improve biodiversity.

Policy SS2: Sustainable Design Strategy for the District

You will need to read the policy [here](#) before answering this question.

4. Do you have any comments on this policy? Please provide any evidence you have to support your comments

There is reference in the policy to water efficiency. How does CCC envisage water efficiency being policed / monitored / measured. Could the policy be strengthened through inclusion of the concept of water neutrality / zero water use by promoting measures such as rainwater harvesting and greywater reuse?

South East Water supports the other provisions made in draft policy SS2.

Policy SS3: Development Strategy for the district

You will need to read the policy [here](#) before answering this question.

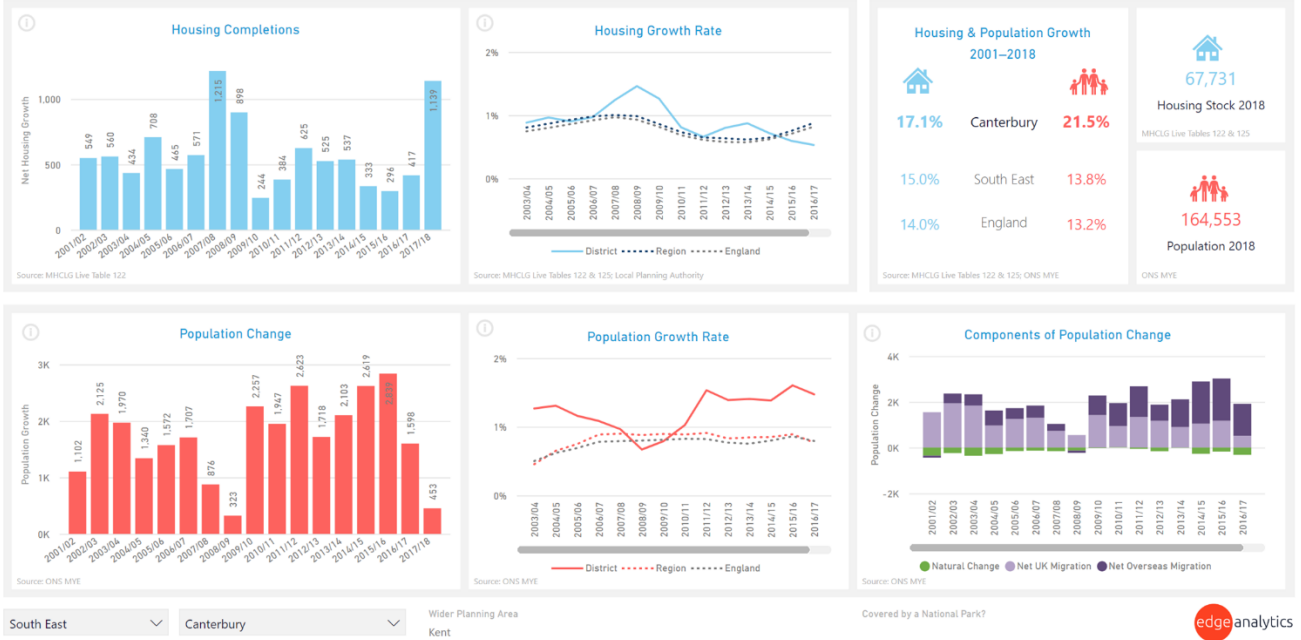
5. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water notes the reference in Policy SS3 to a new rural settlement is planned for land north of the University of Kent campus, north of Canterbury, which will provide new homes, jobs, services and infrastructure. It is vital that any masterplan for this development site ensures sufficient land is safeguarded for a prospective new treated water main between the proposed Broad Oak Reservoir and Blean Service Reservoir. It is expected that the final policy wording relating to this site allocation will include such a safeguarding commitment. In addition to ensuring that the Broad Oak project is capable of being delivered in full during the plan period, the safeguarding of land for a new treated water main also offers potential opportunities for biodiversity net gain and active travel connectivity between the masterplan and the new reservoir itself.

As part of the development of our Water Resources Management Plan 2024 we worked in collaboration with Edge Analytics, a specialist demographic forecasting consultancy, to develop property and population forecasts at a water resource zone level. Edge Analytics maintain a comprehensive geographical database of detailed data from all local plans produced by local authorities across the UK as shown in the below graphs.

Our recently published revised draft WRMP considers the most recent housing trajectory figures from Canterbury City Council, available at the time we developed our plan.

Canterbury
Housing & Population Growth History



South East | Canterbury | Wider Planning Area Kent

Covered by a National Park?



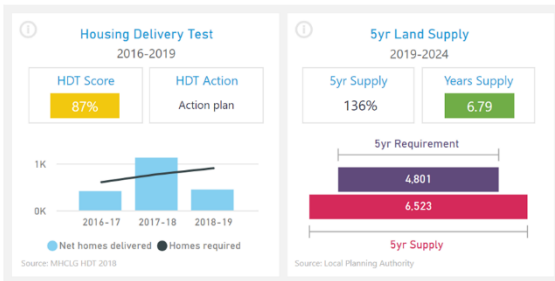
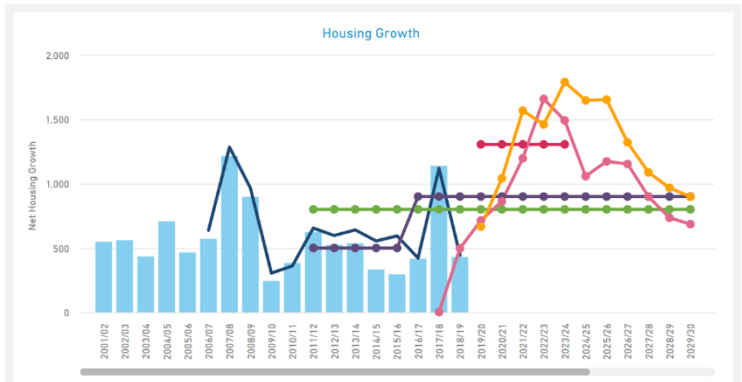
Canterbury
Local Plan Status & Housing Growth



Adopted Plan: Adopted (Reg 26)

	Adopted Plan	Emerging Plan
Plan Overview	(Blank)	The LDS sets out the timetable for the Local Plan review.
Plan Period	2011-2031	(Blank)
Target Total	16,000	(Blank)
Target p.a.	800	(Blank)
Adoption Date	Q3 2017	Q3 2022

Source: Local Planning Authority

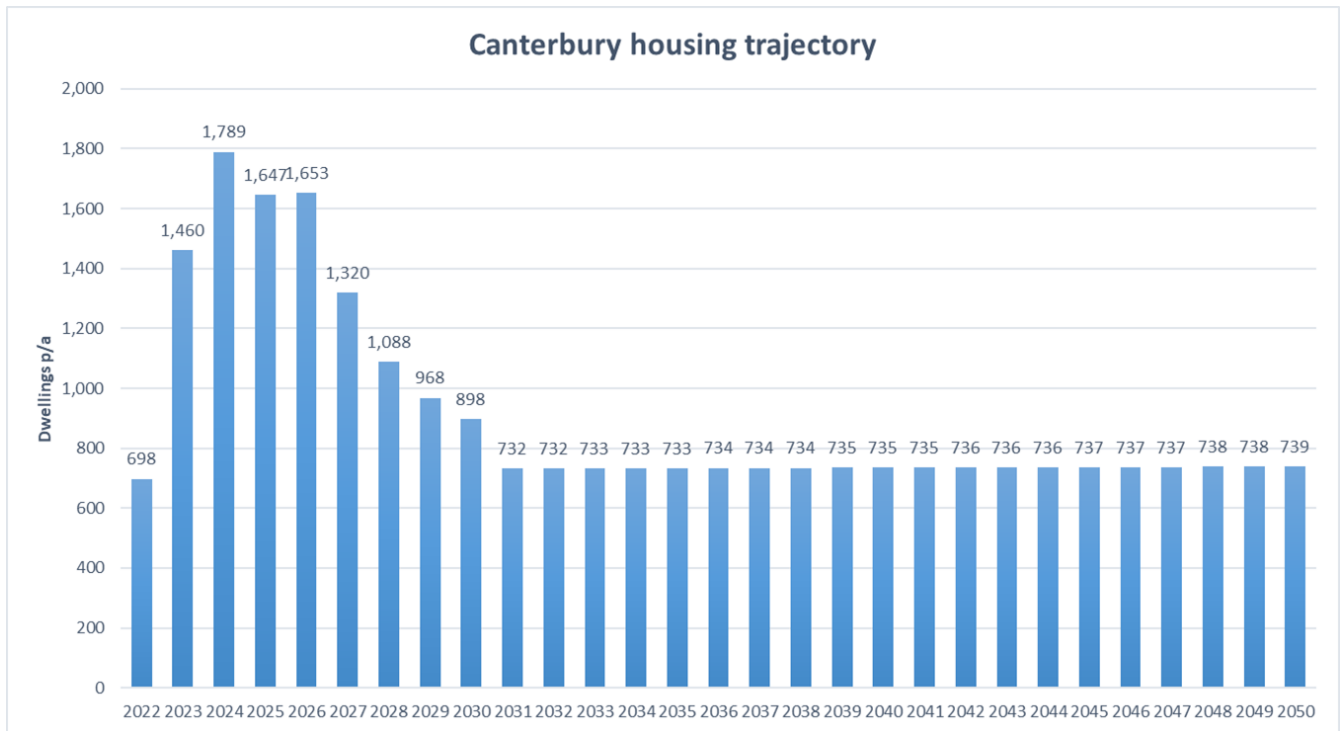


ID	Data Category	Date	Document Type
1a	Council Net Completions		
1b	MHCLG Net Completions (Live Table 122)		
2	Local Housing Need (LHN)		
3	Objective Assessment of Need (OAN)	2017	Monitoring Report
4	LP Requirement (adopted)	2017	Local Plan Main Modifications
5	5yr Housing Land Supply	2019	Monitoring Report
6	Housing Land Availability	2019	Other
7	Planned Housing Delivery	2019	Monitoring Report

South East | Canterbury | Wider Planning Area Kent

Covered by a National Park?





Based on the above, we are confident that our plans accommodate a level of growth discussed with the Council in recent years (although final refinement may be required, based on our above review and checks) to ensure that sufficient water is available within the local area to meet a supply-demand balance. The interventions we will deliver to meet this balance are a mix of new water supplies and demand management initiatives as set out in the sections below.

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, to ensure that any necessary infrastructure reinforcement is delivered (to move water to where is needed at a development level) ahead of the occupation of development. 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.

South East Water would welcome further engagement with Canterbury City Council on this matter.

Policy SS4: Movement and Transportation Strategy for the district

You will need to read the policy [here](#) before answering this question.

6. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water strongly supports a significant shift to low carbon and active travel journeys as this would contribute to reducing the District's carbon emissions and the effects of climate change on the resilience of Canterbury's water resources.

Policy SS5: Infrastructure Strategy for the district

You will need to read the policy [here](#) before answering this question.

7. Do you have any comments on this policy? Please provide any evidence you have to support your comments

We welcome the inclusion of reference to "A new reservoir at Broad Oak" but would welcome a minor change to the wording currently included.

We would request the wording be changed to:

"a new reservoir at Broad Oak including raw water transfer from the Great Stour, Water Treatment Works, potable water mains and associated recreational and visitor facilities designed in consultation with members of the community and key stakeholders"

As set out in our response to Policy R17, it is important to clearly define what is meant by the definition of the Broad Oak site as a Country Park. In its current form, we consider the wording in Policy R17 to be overly prescriptive and may constrain South East Water's ability to pursue a consensus based approach to the final design of the site in collaboration with the local community and key stakeholders.

CHAPTER 2: CANTERBURY

Policy C12: Land north of the University of Kent

You will need to read the policy [here](#) before answering this question.

12. Do you have any comments on this policy? Please provide any evidence you have to support your comments

It is vital that the policy wording in C12 makes reference to the need safeguard land for a prospective new treated water main between the proposed Broad Oak Reservoir and Blean Service Reservoir. The route of any treated water main is yet to be confirmed, however, will likely run east to west through the southern portion of the masterplan site. We note references in the policy to requirements to "...Provide green corridors to link wider countryside to the city centre including enhancements to the potential habitat connectivity offered by the disused Crab and Winkle railway and along the Sarre Penn valley" and "New

and improved walking and cycling connections to Blean, Tyler Hill, Broad Oak and the wider countryside to the east”. It is considered that any safeguarded route for a treated water main could assist in the delivery of active travel and habitat connectivity. We recommend the following wording be included within the wording of Policy C12:

“2. Design and layout

The design and layout of the site should:

(g) ensure land is safeguarded for the delivery of a new potable water main from the proposed Broad Oak Reservoir (see Policy R17) running east to west through the site. The safeguarded route shall be identified in consultation with South East Water”

CHAPTER 5: RURAL AREAS

Policy R3: Land at Ashford Road (east)

You will need to read the policy [here](#) before answering this question.

3. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water supports the policy that ‘the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate’. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R4: Land at Ashford Road (west)

You will need to read the policy [here](#) before answering this question.

4. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water supports the policy that ‘the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate’. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R5: Bread and Cheese Field

You will need to read the policy [here](#) before answering this question.

5. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

We consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R6: Land at Hersden

You will need to read the policy [here](#) before answering this question.

6. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water supports the policy that ‘the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate’. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R7: The Hill, Littlebourne

You will need to read the policy [here](#) before answering this question.

7. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water supports the policy that ‘the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate’. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R8: Land at north of Corty Hill

You will need to read the policy [here](#) before answering this question.

8. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water supports the policy that 'the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate'. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R9: Land north of Popes Lane

You will need to read the policy [here](#) before answering this question.

9. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water supports the policy that 'the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate'. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R10: Land at The Paddocks, Shalloak Road

You will need to read the policy [here](#) before answering this question.

10. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water supports the policy that 'the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate'. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R12: Land west of Cooting Lane and south of Station Road

You will need to read the policy [here](#) before answering this question.

12. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water supports the policy that 'the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate'. However, we consider that the policy should

explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R13: Land adjacent to Valley Road

You will need to read the policy [here](#) before answering this question.

13. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water supports the policy that 'the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate'. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R14: Land at Goose Farm, Shalloak Road

You will need to read the policy [here](#) before answering this question.

14. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water supports the policy that 'the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate'. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R16: Land fronting Mayton Lane

You will need to read the policy [here](#) before answering this question.

16. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water supports the policy that 'the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate'. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R17: Broad Oak Reservoir and Country Park

You will need to read the policy [here](#) before answering this question.

17. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water strongly supports a specific policy highlighting the need for Broad Oak Reservoir. We support the indicative extent of the reservoir and the broad layout shown in the concept masterplan, however, we consider that the wording of the policy is currently overly prescriptive.

We are in process of seeking views from the local community on the design of the reservoir; a process which will gather more pace in the next year or so as initial design ideas are developed. We will be reinvigorating the Broad Oak Reservoir community panel, which will be vital in ensuring we take all views into account when developing our designs for the reservoir. There is potential for the consensus expressed by local community members and key stakeholders to differ from the wording currently drafted in the policy, particularly around the proposed development mix, which could present a challenge in demonstrating conformance at application stage. For example, whilst it is our ambition to maximise the recreational benefits of the reservoir, the specific requirement to provide for water sports could be in conflict with the need to manage and preserve water quality, enhance biodiversity and protect residential amenity. On this basis we suggest that policy R17 be reworded in a less prescriptive manner, as set out in the text in italics below.

Site R17 is allocated for a new raw water reservoir with water treatment works, associated infrastructure, raw water transfer pipeline from the Great Stour, new treated water main and realignment of Sarre Penn (if feasible and appropriate). Planning permission will be granted for development which meets the following criteria:

Development mix

*Across the site, the development mix **may** include the following uses, subject to ongoing stakeholder and community engagement:*

- (a) Education/Visitor Centre including community uses;*
- (b) Birdwatching walks includes birdwatching hides or shelters;*
- (c) Pedestrian and cycle routes including family friendly, wheelchair accessible, and art and sensory trails;*
- (d) Picnic areas; and*
- (e) Cycle and car parking.*
- (f) Non-motorised water sports including access into the reservoir and associated infrastructure;*
- (g) Other ancillary visitor and recreational facilities as deemed appropriate .*

2. Design and layout

The design and layout of the site should:

- (a) Be developed in accordance with a masterplan demonstrating a comprehensive approach to development, long-term management and stewardship;*
- (b) Provide development that is sensitively designed to reflect the rural character and ensure design, scale and materials reflect the location;*
- (c) Incorporate proposals to mitigate for impacts to designated heritage assets. Mitigation proposals should be developed in consultation with relevant specialists including the County Archaeologist and Historic England;*
- (d) Mitigate any adverse noise impacts from the proposed water treatment works; and*
- (e) Provide a minerals assessment in accordance with the Kent Minerals and Waste Local Plan and other material considerations.*

3. Landscape and green infrastructure

The green and blue infrastructure strategy for the site should:

- (a) Provide sustainable urban drainage which makes use of the existing topography and natural features of the site where appropriate;*
- (b) Provide 10% biodiversity net gain;*
- (c) Incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Area E2: Sarre Penn Valley set out in Canterbury Landscape Character and Biodiversity Appraisal;*
- (d) Retain and where appropriate enhance the Ancient Woodland and West Blean & Thornden Woods Site of Special Scientific Interest;*
- (e) Ensure a substantial buffer between any development and the West Blean & Thornden Woods Site of Special Scientific Interest, Ancient Woodland and Little Hall and Kemberland Woods and Pasture local wildlife site;*
- (f) Aim to retain as much priority habitat as possible, and provide adequate mitigation where this is not possible;*
- (g) Provide habitat, pollinator and ecological connectivity across the site and with the surrounding landscape, including with fragment woodland, Ancient Woodland and Priority Habitats; and*
- (h) Conserve or enhance the PRow network across the site*

4. Access and transportation

The access and transport strategy for the site should:

- (a) Maximise safe and convenient pedestrian and cycle connectivity to existing routes and nearby settlements including provision of a Herne Bay to Canterbury cycle route;*

- (b) Deliver a comprehensive network of safe walking and cycling accessible routes and trails for all levels of mobility, incorporating the PRoW network. PRoW routes should be sensitively realigned where required;*
- (c) Provide primary access from Herne Bay Road;*
- (d) Provide appropriate access arrangements and vehicle and cycle parking facilities for community, education, appropriate recreational uses that complement the need to provide a biodiversity gain at the site and water treatment facilities;*
- (e) Maintain access to existing residential buildings; and*
- (f) Provide a transport assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars.*

We broadly agree with the approach to landscape and green infrastructure and will seek to maximise opportunities for biodiversity enhancement as part of the development, however the need for the development to achieve 10% biodiversity net gain is engrained in the Environment Act 2021. Setting a higher target of 20% biodiversity net gain would create a contradiction between legislation and policy, potentially creating complexity and increasing cost. It is worth noting that the principal driver for the proposed scheme is to reduce reliance on the abstraction of groundwater which will in itself will result in significant benefits for biodiversity by enhancing the environmental resilience of precious resources such as chalk streams.

We would welcome the opportunity to discuss the proposed policy wording with you in more detail.

Policy R18: Land at Church Farm

You will need to read the policy [here](#) before answering this question.

18. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water supports the policy that 'the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate'. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

Policy R19: Countryside

You will need to read the policy [here](#) before answering this question.

19. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water supports the policy that 'the green and blue infrastructure strategy for the site should: Provide sustainable urban drainage making use of the existing topography and natural features of the site where appropriate'. However, we consider that the policy should explicitly promote landscapes that replenish groundwater (through effective rainfall) and slow the flow to enable water to be replenished. We would also want to see policies that work to support good raw water quality, thus reducing road run off and pollution arising from effluent discharge.

CHAPTER 6: DISTRICT-WIDE STRATEGIC POLICIES

Policy DS3: Estate regeneration

You will need to read the policy [here](#) before answering this question.

3. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water considers that maximising development on brownfield sites and regenerating areas would help to reduce the amount of new impermeable surfaces throughout the District. This should reduce the surface run off of rainfall and retain more opportunities for infiltration compared with alternative approaches. This would assist with addressing localised flooding, maintaining water quality of waterbodies and ensuring groundwater recharge.

Policy DS4: Rural Housing

You will need to read the policy [here](#) before answering this question.

4. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water considers that maximising development on brownfield sites and regenerating areas would help to reduce the amount of new impermeable surfaces throughout the District. This should reduce the surface run off of rainfall and retain more opportunities for infiltration compared with alternative approaches. This would assist with addressing localised flooding, maintaining water quality of waterbodies and ensuring groundwater recharge.

Policy DS6: Sustainable Design

You will need to read the policy [here](#) before answering this question.

6. Do you have any comments on this policy? Please provide any evidence you have to support your comments

SEW fully supports and welcomes the inclusion of Policy DS6. South East Water's aim is to reduce household consumption to reach the per capita consumption ambition of 110 l/h/d by 2050, as set out in our Water Resources Management Plan 2024 (currently with the Secretary of State for approval). This 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 important to note that 110l/h/d is an average across the South East Water customer base and for this reason the aspiration should be for all new development to be carbon neutral as the target can only be achieved through new builds being more water efficient than the existing housing stock.

It is recognised by South East Water that working in isolation is unlikely to achieve the levels of per capita consumption included in our forecast. South East Water's ambitious water efficiency strategy, alongside the water labelling of all water using products (already committed to by government), will achieve the forecast per capita consumption reductions required in the shorter term. Longer term, South East Water 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.

South East Water supports Policy DS6 and its reinforcement of the mandatory housing standards for water use, that support water efficiency in new buildings, and that the policy refers to potentially higher standards being applied in the future. Canterbury City Council's attention is drawn to the Future Home Hub's 'Water Ready – A report to inform HM Government's roadmap for water efficient new homes' published in April 2024. This recommends that the Government sets lower litres per person per day for water stressed areas, which would include Canterbury District. It further recommends an agreed national framework for achieving water positive outcomes in areas of serious water stress, in particular where water scarcity has the potential to inhibit the adoption of Local Plans or the granting of planning permission. It is likely that further guidance and potential changes in legislation may come forward during the passage of the Local Plan drafting. South East Water recommends that this is monitored carefully by the Council and that Policy DS6 is adapted as necessary during this period.

The effective, future management of water is however not just about reducing water use, but also ensuring that properties are resilient to supply interruptions and peak demand for water is manageable. South East Water therefore requests that policy DS6 also includes the requirement for water storage in properties, with all new houses incorporating a minimum of 24 hours water storage.

South East Water is keen to discuss any future collaborations with the Council in any potential water efficiency initiatives or proof of concept trials etc that can benefit customers within the area.

Policy DS7: Infrastructure delivery

You will need to read the policy [here](#) before answering this question.

7. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water considers that it is vital that the delivery of growth over the plan period is subject to pre-requisites such as infrastructure levy funding for water efficiency; ensuring adequate permeability and sustainable drainage in new development; adopting design standards that build-in resilience to flooding events; supporting behavioural change in efficient water use; and targeted infrastructure provision. South East Water considers that water infrastructure should be specifically referenced in policy DS7.

Policy DS11: Tourism Development

You will need to read the policy [here](#) before answering this question.

11. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water considers that Broad Oak reservoir could extend and connect existing leisure routes near Canterbury via woodland walks, footpaths and cycle trails through the site, and possibly art, sensory trails and environmental education facilities. These features have the potential to enhance Canterbury's tourism offer by creating a leisure destination that can complement the commercial and cultural offer in the urban areas and the seaside offer at Herne Bay.

South East Water supports the policy that proposals for Marina provision and associated facilities will be supported where the development accords with other policies in this plan and where the development would not result in any risk of flooding elsewhere, and any mitigation measures are completed in advance of the development.

Policy DS12: Rural Economy

You will need to read the policy [here](#) before answering this question.

12. Do you have any comments on this policy? Please provide any evidence you have to support your comments

The policy should highlight the need for groundwater quality to be protected through sustainable catchment management partnerships and by avoiding intensive agricultural practices within source protection zones. The Local Planning Authority should seek to ensure that source protection zones and drinking water protection areas are adequately protected from the potential impact of new development (discharges from sewage, artificial wetlands, septic tanks & the risk to raw water quality deterioration). Decisions on planning applications should safeguard these areas for both raw water quality and replenishment through recharge as this is a key water resource for the local population.

Policy DS13: Movement Hierarchy

You will need to read the policy [here](#) before answering this question.

13. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water considers that opportunities for walking and cycling should be maximised in all development throughout the District to facilitate less carbon intensive travel modes. This would contribute to reducing the District's carbon emissions and the effects of climate change on the resilience of Canterbury's water resources. We consider that all new developments should show how they would maximise opportunities for walking and cycling to achieve positive outcomes for less carbon intensive travel modes.

Policy DS14: Active and sustainable travel

You will need to read the policy [here](#) before answering this question.

14. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water considers that opportunities for walking and cycling should be maximised in all development throughout the District to facilitate less carbon intensive travel modes. This would contribute to reducing the District's carbon emissions and the effects of climate change on the resilience of Canterbury's water resources. We consider that all new developments should show how they would maximise opportunities for walking and cycling to achieve positive outcomes for less carbon intensive travel modes.

Policy DS20: Flood risk and sustainable drainage

You will need to read the policy [here](#) before answering this question.

20. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water strongly supports the policy that proposals for development that would increase the risk of flooding on or off the development site, or would compromise the performance of flood defences will be refused (DS20.1).

We strongly agree with the approach to flood risk assessments in policy DS20.2 – DS20.3.

We strongly agree with policy DS20.4 that proposals for development should include identified drainage provision suitable for the proposal and its location, taking account of advice and guidance from Kent County Council, the Lead Local Flood Authority. All proposals should integrate sustainable drainage systems (SuDs), incorporating naturalistic solutions into the design and soft landscaping of the development. SuDs provision within open spaces provided as part of development will only be acceptable where the open space continues to meet the quality standards set out in Policy DS24.

We also support the approach to coastal management in policy DS20.6 – DS20.8.

Policy DS21: Supporting biodiversity recovery

You will need to read the policy [here](#) before answering this question.

21. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water is supportive of the enhancement of biodiversity across the district. Notwithstanding this, the requirement for new development to achieve 10% biodiversity net gain is engrained in the Environment Act 2021. Setting a higher target of 20% biodiversity net gain would create a contradiction between legislation and policy, potentially creating complexity and increasing cost.

Policy DS23: The Blean Woodland Complex

You will need to read the policy [here](#) before answering this question.

23. Do you have any comments on this policy? Please provide any evidence you have to support your comments

We note the reference to the proposed Broad Oak Reservoir in Policy DS23: “Proposals for development on land surrounding the Blean Woodland Complex, including Policy C12 - Land north of University of Kent and Policy R17 - Broad Oak Reservoir and Country Park, will need to ensure that development does not adversely affect the landscape, ecology or setting of the Blean Woodland Complex”. South East Water is committed to working with stakeholders to ensure the proposals for Broad Oak are brought forward in a manner compatible with the conservation aspirations of the Blean Woodland Complex. Our comments in response to draft Policy R17 highlight the need for less prescriptive

requirements relating to the development mix for the proposed Broad Oak Reservoir and associated development. One of the primary reasons for this is to ensure that any proposals for Broad Oak can be brought forward in conformance with both Policy R17 and DS23.

Policy DS24: Publicly accessible open space and sports

You will need to read the policy [here](#) before answering this question.

24. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water supports the provision of new open space, in particular the policy requirement that 'proposals for development which include provision of new on site open space must ensure that new open spaces meet the specified quality standards below: (a) Be designed as part of the green infrastructure network in a locality, contributing to local landscape character, connecting with local routes and green corridors for people and wildlife as well as providing multi-functional benefits such as addressing surface water management priorities' (Policy DS24.5(a)).

Policy DS25: Renewable energy and carbon sequestration

You will need to read the policy [here](#) before answering this question.

25. Do you have any comments on this policy? Please provide any evidence you have to support your comments

Population growth in the local area has the potential to contribute to rising greenhouse gas emissions, which contribute significantly to climate change through the greenhouse effect. As we have highlighted in our responses to previous consultations, it is vital that the Local Plan does its part in addressing the root causes of climate change as well as enabling necessary adaptations that will grow the District's resilience to its effects. The impacts of climate change are particularly relevant to the sustainable supply of water. South East Water are signatories of 'Race to Zero', the UN-backed global campaign to take rigorous and immediate action to halve global emissions by 2030 and deliver a healthier, fairer zero carbon world. Accordingly, we support immediate action to achieve a zero carbon world by 2030 which would assist with reducing the negative effects of climate change on the District's water supply.

CHAPTER 7: DEVELOPMENT MANAGEMENT POLICIES

Policy DM2: Residential Garden Land

You will need to read the policy [here](#) before answering this question.

2. Do you have any comments on this policy? Please provide any evidence you have to support your comments

Development of residential garden land may have adverse cumulative effects on flood risk, groundwater recharge and increased runoff to the network, putting additional pressure on existing storage and treatment infrastructure. The requirements of Policy DS6 and DS20 should be equally applied to the development of residential garden land.

The Local Planning Authority should seek to ensure that source protection zones and drinking water protection areas are adequately protected from the potential impact of new development (discharges from sewage, artificial wetlands, septic tanks & the risk to raw water quality deterioration). Decisions on planning applications should safeguard these areas for both raw water quality and replenishment through recharge as this is a key water resource for the local population.

We consider that the policy should support the development of zero water use for properties through measures such as greywater reuse and rainwater harvesting.

Policy DM5: Parking design

You will need to read the policy [here](#) before answering this question.

5. Do you have any comments on this policy? Please provide any evidence you have to support your comments

South East Water welcomes the policy that new car parking should include permeable paving. Overall, we would welcome a significant reduction in car parking provision in the most sustainable locations and to allow for enough provision in suburban areas. This should assist with reducing the amount of impermeable area on development sites and allow more space for sustainable drainage systems and improve the District's resilience to flooding events, maintain the water quality of waterbodies and improve groundwater recharge. More cycle parking spaces would help to promote cycling and reduce travel by car, which is a carbon-intensive travel mode. Reducing the District's carbon emissions and the effects of climate change on the resilience of Canterbury's water resources is considered to be a key priority.

Policy DM15: Sustainable drainage

You will need to read the policy [here](#) before answering this question.

15. Do you have any comments on this policy? Please provide any evidence you have to support your comments

We strongly support the need for development to include identified drainage provision suitable for the proposal and its location, taking account of advice and guidance from Kent County Council, the Lead Local Flood Authority. All proposals should integrate sustainable

drainage systems (SuDs), incorporating naturalistic solutions into the design and soft landscaping of the development.

Policy DM16: Water Pollution

You will need to read the policy [here](#) before answering this question.

16. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments

South East Water strongly supports the policy provision that proposals to enhance existing aquatic environments and ecosystems will be supported. We consider it appropriate that new development should not compromise Water Framework Directive objectives.

We strongly support the requirement for risk assessments of the impact of proposals on surface and groundwater systems and appropriate mitigation.

We strongly support that development will not be permitted where it would: (a) Prejudice the quality or quantity of surface or groundwater; or (b) Have an adverse impact on groundwater protection zones or drinking water safeguard zones; or (c) Have an adverse impact on water dependent protected sites or species.

We also support that agricultural development or changes in land use will also need to demonstrate how they are taking account of, and minimising, any harm to nitrate vulnerable zones.