

15 May 2026



Our Reference: SEW Response_CCLP_18/05/26
Your Reference: Canterbury Local Plan

Email: [REDACTED]

Local Plan
Consultations Team
Canterbury City Council
14 Rose Lane
Canterbury
CT1 2UR

consultations@canterbury.gov.uk

Dear Sir/Madam,

**Subject: South East Water Response to Draft Canterbury District Local Plan:
Regulation 19 consultation**

South East Water would like to thank Canterbury City Council for bringing the draft Canterbury 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](#)

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

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.

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.

As set out in the table below, we have noted a total housing need figure of 23,085 dwellings within your draft local plan for the period 2024/25 to 2042/43. Within WRMP24, the work carried out at a regional planning level assumed a total of 17,117 dwellings across the same time period for your full local authority area (including Southern Water and Affinity Water).

Comparison at full local authority area

Source	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
WRMP24	1,647	1,653	1,320	1,088	968	898	732	732	733	733
Local Plan	1,215	972	972	972	972	972	972	972	1,370	1,370
% difference	-26.23%	-41.20%	-26.36%	-10.66%	0.41%	8.24%	32.79%	32.72%	86.98%	86.90%
Source	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	Total
WRMP24	733	734	734	734	735	735	735	736	736	17,117
Local Plan	1,370	1,370	1,370	1,370	1,370	1,370	1,370	1,370	1,366	23,085
% difference	86.81%	86.72%	86.64%	86.55%	86.46%	86.37%	86.29%	86.20%	85.57%	34.87%

Based on the above assessment, at full local authority area, it is unlikely we would be able to accommodate growth exceeding our WRMP24 forecast assumptions from approximately 2032-33 onwards.

We have also completed work to review the number of housing developments that fall specifically within our supply area only. These are set out in the table below, however, to complete our assessment, and compare directly against our WRMP24, we will require Canterbury City Council to breakdown the forecast provided in your draft local plan to those within our supply area only. i.e. WRZ8 - Ashford water resource zone. We would welcome this information and are happy to discuss further with you as needed.

Rocfort Road
Snodland
Kent ME6 5AH

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

Comparison for SEW supply area

Source	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
WRMP24	1,641	1,647	1,314	1,082	963	892	727	698	698	699
Local Plan	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
% difference	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
Source	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	Total
WRMP24	699	699	699	700	700	700	701	701	701	16,661
Local Plan	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
% difference	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC

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.

New Water Supplies and Infrastructure Development

To support existing customers and future developments within South East Water's supply area, more specifically, within our WRZ8 (Ashford) 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. Alongside our capital maintenance programme, we have a number of enhancement schemes planned for delivery within the East Kent area. Our business plan was purposely split out into regional plans, and can be found at the following link on our website: [South East Water - Business Plan 2025 - 2030](#). For information, this includes a section covering the Kent region from pg.129.

Water supply schemes:

Within our long term Water Resources Management plan, SEW proposes to deliver a number of new supply side interventions including Broad Oak Reservoir, Reculver Desalination, as set out below. These are needed as a twin track approach alongside demand management initiatives such as leakage, water efficiency initiatives and changes to policy/building standards (as set out in the section below).

Rocfort Road
Snodland
Kent ME6 5AH

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

- Broad Oak reservoir - we are now well underway in delivery of this strategic scheme to provide increased supplies to East Kent. **Please see Annex A for our response to questions 85 and 86 in relation to draft Policy R24 ‘Broad Oak Reservoir and Country Park’ and also questions 9 and 10 in relation to Policy SS1 ‘Environmental Strategy for the district’.**
- Distribution of water from Broad Oak reservoir to Blean SR - this scheme is required to allow the clean water supply from the water treatment works at the new reservoir to be delivered into our network via an existing service reservoir.
- Reculver desalination - this will provide 30 Ml/d of new water and include an improvement scheme to the pipe network to improve connectivity within the local area. **Please see Annex B for our response to the Canterbury District Council Local Plan Regulation 19 Consultation (2026), relating to a new desalination scheme within the Reculver/Herne Bay area.**

Resilience schemes:

- Thanington to Dunkirk interconnector - providing resilience to customers in the east of Canterbury.
- Service Reservoir storage capacity upsizing in Ashford - to provide increased resilience to supply interruptions for customers south of Canterbury and Ashford.

Water quality schemes:

- Nitrate removal plant at Boughton WTW - again for the East Canterbury / Faversham areas.

Environmental schemes:

- There are also a number of WINEP schemes proposed for the area covering surface and ground water investigations and improvements, restoring sustainable abstraction investigations and improvements and biodiversity recovery / net gain.

Other schemes:

- We also have a number of company wide investments benefitting all regions including SEMD Alternative Water - increasing our capability for alternative water supply during events / incidents, SEMD Cyber - ensuring our systems are cyber secure.

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

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

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.

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 Canterbury City 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

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

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.

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.

Rocfort Road
Snodland
Kent ME6 5AH

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

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 Canterbury Local Plan, using the following mailbox: [REDACTED]. We look forward to working with Canterbury City 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

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>

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

Annex A - Broad Oak Reservoir

Policy R24: Broad Oak Reservoir and Country Park

85. Do you consider that Policy R24: Broad Oak Reservoir and Country Park is sound? Please indicate your view on each of the following soundness tests:

Test	South East Water Response
The policy is positively prepared	Yes
The policy is justified	Yes
The policy is effective	No
The policy is consistent with national policy	No

86. Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.

South East Water welcomes and strongly supports the inclusion of Policy R24 in the Canterbury District Local Plan Regulation 19 Draft. Broad Oak Water will ensure a resilient and sustainable water supply that will benefit the natural environment and community, now and in the future. However, as currently drafted, the policy contains several requirements and expectations that are not justified by the evidence base and risk rendering the policy unsound. South East Water considers the following modifications are required to meet the soundness test.

***Extract from Draft Canterbury District Local Plan: Regulation 19 consultation
Policy R24 (Indicative Concept Masterplan on page 224)***

South East Water Response to Indicative Concept Masterplan

The 'Site Boundary' depicted in the Indicative Concept Masterplan on page 224 is the extent of South East Water land ownership. For clarity, SEW considers it preferable for the current draft Red Line Boundary to be used as the basis for the site boundary in the Indicative Concept Masterplan. Whilst we acknowledge that the Indicative Concept Masterplan is 'high-level', there are parcels of land within the 'Site Boundary' which, based on the current outline design, would not be required for the purposes of facilitating

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

the construction and/or operation of the scheme and therefore may be misleading. We would be happy to provide the current draft red line boundary for the scheme if required.

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Development Mix)

1(a) Draft Policy text: *77ha raw water reservoir with water treatment works and associated infrastructure including a raw water transfer pipeline from the Great Stour, new treated water main and realignment of Sarre Penn, (if feasible and appropriate).*

South East Water Response to 1(a) Draft Policy text

There is no reference within the current policy wording to raw water abstraction from the Little Stour. Based on the current outline design, abstraction of raw water from the Little Stour is an essential component of the scheme and should therefore be referenced in the policy text.

Proposed amendment to policy text:

“77ha raw water reservoir with water treatment works and associated infrastructure including abstraction from the Little Stour and Great Stour, a raw water transfer pipeline from the abstraction points to the reservoir, new treated water main from the reservoir into the existing supply network and realignment of Sarre Penn, (if feasible and appropriate)”.

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Development Mix)

1(b) – 1(i) draft policy text: relating to recreational facilities.

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

South East Water Response to 1(b) – 1(i) draft policy text

This section does not acknowledge the potential for environmental impacts arising from certain forms of recreational and amenity use, particularly given the site's proximity to designated sites and ancient woodland. We consider that the policy would benefit from explicit reference to the need to design recreational uses in a way that avoids increased recreational pressure on sensitive habitats.

A Visitor and Recreational Study[1] was undertaken by SEW in 2025 to consider the appropriate scale and nature of recreational amenities at Broad Oak Water in collaboration with the Broad Oak Water Stakeholder Advisory Group (SAG). The study concluded that a medium intensity recreational offer would be appropriate considering the operational and access constraints, rural location, proximity to designated sites and potential impacts on local traffic and the environment. Feedback received during public engagement undertaken in February and March 2026 supported this approach. A report containing the findings of the public engagement exercise will be published in late Spring/early Summer 2026 and will be shared with Canterbury City Council to further inform Examination.

In particular, South East Water considers that Policy R24 should explicitly exclude motorised water sports. Motorised water sports would be incompatible with both:

- the nature conservation objectives of the site (including proximity to designated habitats), and
- the operational and safety requirements of a strategic raw water reservoir.

Allowing for such uses would conflict with the environmentally-led purpose of the scheme and introduce unacceptable ecological and operational risks.

In March 2025, a workshop was held with the Broad Oak Water SAG to focus on the range of amenities that could be provided as part of the scheme. There was a consensus on the need for a clear distinction to be drawn between motorised and non-motorised water sports, with the latter deemed inappropriate at this location; some attendees pointed to the proximity to the Kent coast where these activities are available in a more appropriate environment.

For these reasons we would request that the current draft policy wording be amended to clarify that motorised water sports are not supported and that recreational uses are limited to low-impact, non-motorised activities only, where compatible with ecological and operational constraints.

For similar reasons, the policy wording should be amended to exclude fishing as a supported use.

Our findings from customer and stakeholder (internal and external) research to date indicate that allowing fishing at the site would:

- increase recreational pressure on sensitive habitats,
- introduce operational and biosecurity risks, and
- conflict with the reservoir's primary water supply function.

Rocfort Road
Snodland
Kent ME6 5AH

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Design and Layout)

2(c) draft policy text: *Locate the community, education, sports uses and water treatment facilities on the eastern side of the site. Consideration should be given to the scope of the reuse of existing buildings on western side of the site to further expand the range of facilities available.*

South East Water Response to 2(c) draft policy text

To inform the Concept Design a study was undertaken to investigate the possible locations for a visitor hub considering operational constraints, designated sites, access and the required footprint to accommodate the new water treatment works. This identified that the preferred location for the visitor hub would be to the northeast of the reservoir. There is limited space to the east of the reservoir, and this would be taken up by the main embankment, water treatment works and fish pass.

In addition, there would be no general vehicular access to the public to the existing buildings on the western site of the site, however there may be potential for operational use of these buildings.

South East Water therefore proposes an amendment to the current draft policy text as follows:

Locate the community, education and sports uses and water treatment facilities on the north east / eastern side of the site. Consideration should be given to the scope of the reuse of existing buildings on western side of the site.

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Design and Layout)

2(d) draft policy text: *Appropriately relocate and reconstruct the Grade II Listed Building, Vale Farmhouse, Barnetts Lane within the site and identify an ongoing viable use for the building to ensure its long- term conservation, in consultation with relevant specialists including the County Archaeologist and Historic England.*

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122
EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365
WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874
Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH
ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

South East Water Response to 2(d) draft policy text

The Local Plan's aspiration to relocate Vale Farmhouse as part of the scheme is premature and introduces significant heritage, delivery and financial risk. As yet, no Level 3/4 historic building recording, fabric analysis or archaeological assessment has been undertaken to inform any such discussion as we are currently waiting on Historic England to review the survey proposal as part of their Extended Advisory Service. Therefore, the building's significance, integrity, condition and capacity to withstand being dismantled and re-erected are not currently understood to a level sufficient to justify relocation in policy terms. In the absence of this baseline evidence, it is not possible to demonstrate either that relocation is necessary or that it represents a proportionate response to impact, as required by national policy.

There are also substantial practical constraints, the Weald and Downland Living Museum has no confirmed capacity to receive additional historic structures, and identifying a suitable, policy-compliant and non-harmful relocation site within the reservoir scheme itself has not been resolved. This would not only be a significant challenge, the existing setting and context that contributes to any significance the building might currently have would be lost and as such may offer less justification for relocation as relocation itself would involve harm through loss of setting.

Should subsequent detailed investigations determine that relocation is required, this would introduce a high-risk, time-consuming and expensive intervention involving specialist dismantling, recording, storage, transport and reconstruction, with major implications for programme certainty, scheme viability and deliverability. Until such time as comprehensive historic building surveys are completed and realistic relocation options are evidenced, the relocation of Vale Farmhouse should not be a policy requirement.

For these reasons we consider that the below amendment to the policy wording is required in order to meet the soundness test:

"Assess the significance, integrity and condition of the Grade II Listed Building, Vale Farmhouse on Barnetts Lane through a Level 3/4 survey and liaise with Historic England's Building Inspectorate, KCC County Archaeologist and Canterbury City Council Built Heritage Officers to agree proportionate mitigation".

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Design and Layout)

3(c) draft policy text: relating to landscape and biodiversity enhancements.

South East Water Response to 3(c) draft policy text

The draft policy wording in 3(c) does not currently reference the Kent and Medway Local Nature Recovery Strategy, which has now been published and should be reflected in the design and delivery of landscape and biodiversity outcomes.

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122
EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365
WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874
Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH
ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Design and Layout)

3(d) draft policy text: *Retain all areas of ancient woodland, ensuring they are not damaged nor is their future retention threatened, in line with Policy DS21. Opportunities for the enhancement and improved connectivity of ancient woodland should be incorporated where possible.*

South East Water Response to 3(c) draft policy text

South East Water strongly supports the intent of the policy wording in protecting ancient woodland.

Policy DS21 appropriately reflects the NPPF position on irreplaceable habitats, including the need to avoid loss or deterioration of ancient woodland except in wholly exceptional circumstances. However, the wording of criterion 3(d) of Policy R24 taken out of context of this does not acknowledge the application of the mitigation hierarchy, or that that some interaction with ancient woodland *may* be unavoidable for a strategic infrastructure of this nature. As currently drafted, our concern is that the policy risks being undeliverable and inconsistent with Policy DS21. An amendment is suggested which keeps the clear need to avoid ancient woodland and refers to the content of DS21 and the NPPF.

Proposed amended policy text:

“Avoid impacts on ancient woodland, ensuring that damage and threats to future retention are avoided wherever possible. Where avoidance is not possible, any impacts must be clearly justified (exceptional circumstances) and compensated for in accordance with the mitigation hierarchy, in line with Policy DS21”.

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Design and Layout)

3(e) draft policy text: *Retain and where appropriate enhance the West Blean & Thornden Woods SSSI.*

South East Water Response to 3(c) draft policy text

South East Water strongly supports the intent of the policy wording in protecting West Blean & Thornden Woods SSSI.

The current policy wording implies that enhancement of the SSSI is an inherent requirement of the allocation. Given the scale and nature of the proposal and the fact that some interaction with the SSSI is unavoidable, our suggestion would be for the policy to focus on avoidance as a priority, followed by mitigation and compensation in accordance with the mitigation hierarchy.

Proposed amended text:

“Avoid impacts on West Blean & Thornden Woods SSSI. Where avoidance is not possible, any impacts must be clearly justified and mitigated and, where necessary, compensated for in accordance with the mitigation hierarchy. Consider opportunities for enhancement of the SSSI”.

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122
EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365
WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874
Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH
ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Design and Layout)

3(f) draft policy text: *Provide a substantial landscape buffer between any development and the West Blean & Thornden Woods SSSI, ancient woodland and Little Hall and Kemberland Woods and Pasture Local Wildlife Site.*

South East Water Response to 3(f) draft policy text

The requirement for a buffer is supported in principle whilst recognising that there will be some unavoidable interaction with the SSSI and LWS. The definition of 'substantial' is not clearly defined in the policy wording and may be interpreted inconsistently as well as 'development'. We consider that additional clarification on these terms would help decision makers apply the policy (e.g. development = earthworks/permanent infrastructure etc).

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Design and Layout)

3(g) draft policy text: Ensure that loss of and/or harm to any priority habitat is avoided and where this is not possible, adequate mitigation is provided.

South East Water Response to 3(g) draft policy text

Given the scale of the site, complete avoidance of priority habitats will not be achievable. The thrust of the policy should be on minimising loss and securing appropriate mitigation and compensation, consistent with the mitigation hierarchy and national policy.

Proposed amended text:

"Minimise the loss of priority habitat and ensure that suitable mitigation and compensation are provided".

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy R24 (Design and Layout)

3(g) draft policy text: Consider the enhancement and restoration of Turtle Dove and Nightingale habitats within the site, consistent with RSPB guidance.

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122
EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365
WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874
Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH
ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

South East Water Response to 3(g) draft policy text

South East Water is supportive of the protection afforded to the species referenced in the policy, however, whilst there is RSPB guidance for farmers/land managers for turtle dove, we are unaware of the same guidance for nightingale. In respect of nightingale we believe British Trust for Ornithology guidance may be more appropriate and flexibility in the policy wording could be introduced to accommodate this.

Proposed amended text:

“Consider enhancement and restoration of habitat for turtle dove and nightingale consistent with relevant guidance”.

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation Policy R24 (Design and Layout)

South East Water Response in relation to Biodiversity Net Gain requirements in the context of Broad Oak Reservoir

We suggest that R24 could include a project specific BNG target recognising that Broad Oak Water is an essential infrastructure project effectively funded by water customers and the principles of the NSIP approach should apply. Please see our response to Policy SS1 below.

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation Policy R24 (Design and Layout)

4(a) draft policy text: *Maximise safe and convenient pedestrian and cycle connectivity to existing routes and nearby settlements including provision of a Herne Bay to Canterbury cycle route.*

South East Water Response to Policy R24 4(a)

We consider the wording in Policy R24 4(a) to be ambiguous and infers an expectation of South East Water to deliver a scheme identified in Canterbury City Council's own Local Cycling and Walking Infrastructure Plan (LCWIP). Whilst it may be appropriate for SEW to contribute to the facilitation of this long-distance route, we do not have the necessary powers or funding to deliver all of it and would therefore seek an amendment to the policy wording to reflect this.

Proposed amended text:

"Maximise safe and convenient pedestrian and cycle connectivity to existing routes and nearby settlements including supporting facilitation of a Herne Bay to Canterbury cycle route by providing north-south cycle access through the reservoir site".

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122
EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365
WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874
Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH
ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

Policy R24: SS1 - Environmental Strategy for the district

9. Do you consider that Policy SS1: Environmental Strategy for the district is sound?
Please indicate your view on each of the following soundness tests:

Test	South East Water Response
The policy is positively prepared	Yes
The policy is justified	No
The policy is effective	No
The policy is consistent with national policy	No

10. Please give precise details in the box below, including any changes you would suggest to make the policy sound. If you consider the policy to be sound, please use this box to set out your comments.

Extract from Draft Canterbury District Local Plan: Regulation 19 consultation

Policy SS1 Environmental Strategy for the district

(5) draft policy text: *Qualifying major development across the district will need to incorporate measures to deliver a minimum 20% biodiversity net gain, while qualifying non-major development will need to deliver a minimum of 10% biodiversity net gain in line with Policy DS25. Proposals must have regard to the Local Nature Recovery Strategy, and the council will work with partners to implement the Strategy.*

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122
EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365
WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874
Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH
ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

South East Water Response to Policy SS1 (5)

The 20% benchmark was tested through projects that do not reflect the drivers (in this case environmental), scale or complexity of the Broad Oak Water scheme. The research carried out in Kent on the viability of a 20% BNG target for developments was applied to a mixture of housing and commercial developments. We understand it also did not explicitly include the water environment, where there are added costs and complexity, which is a significant component of the scheme. We do not believe that the findings of this research can be applied to a major development such as Broad Oak Water, without resulting in significant costs to bill payers.

The recent BNG NSIP consultation (April 2026) DEFRA concluded that reinstatement of existing habitats (e.g. replacing a temporary loss of habitat with the same type and condition) is considered non-significant and does not need to be secured from a BNG perspective. Therefore, we consider that the pipeline component of the scheme should not be required to contribute 10% or 20% net gain, rather it is more appropriate to ensure that successful habitat reinstatement is achieved, which South East Water is wholly committed to.

Broad Oak Water is an environmentally-led scheme, which exists in large part to remove unsustainable abstraction pressures elsewhere in the region/district and there is an opportunity through the Local Plan and Biodiversity Strategy to reflect the unique nature of the project in the context of regional/district planning. This could be through specifics applied to the Site Allocation Plan or via a sub policy in the SS1 or DS25 relating to BNG delivery for major infrastructure developments, which should follow all the recommendations/exclusions listed in the recent BNG NSIP consultation (April 2026).

Links to known research reports:

[Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf](#) &
[Justification-for-biodiversity-net-gain-in-Kent-Sept-2020.pdf](#)

Conclusion

SEW strongly supports the inclusion of Policy R24 (Broad Oak Reservoir and Country Park) as a strategic scheme that will ensure a resilient and sustainable water supply. However, as set out in the responses above, SEW believes the policy as currently drafted contains requirements and expectations that are not justified by the evidence base, which risks rendering the policy unsound and requires modifications.

[1] [Broad Oak Reservoir Visitor Amenities Recreation Report.pdf](#)

Annex B - Reculver Desalination

Kent is one of the driest parts of England, resulting in periods where little or no water is available for abstraction. This, coupled with a high population density and household water use results in a need for reliable sources of water supply in the area. As outlined within SEW's Regulation 18 response, from an initial review of the latest housing forecast figures, which have been increased to meet government targets, SEW cannot accommodate additional growth beyond what was assumed in SEW's Water Resources Management Plan 2024 (WRMP24) due to a lack of supply-demand surplus.

Due to the concerns of maintaining a reliable water supply, the required timescales for development of the scheme have been brought forward for a new desalination plant within the Reculver/Herne Bay area. This will support in providing a reliable and drought-proof supply of freshwater by converting seawater into potable water. The Reculver desalination plant will need to be fully operational by 2044, therefore requiring the development to be consented and started within the new Local plan period to 2042/43. This will allow SEW to continue to meet population needs and accommodate freshwater demands of the projected housing growth for the region.

Comments on the Draft Canterbury District Local Plan (Regulation 19)

This section of the Representation outlines specific sections and draft policies in the Draft Canterbury District Local Plan (Regulation 19) and how the proposed development should be considered positively in relation to these.

The Draft Local Plan recognises in the introductory chapters that growth will place pressure on existing infrastructure, including water (paragraph 1.11). **SEW welcomes the commitment to investment in water infrastructure and provision of a resilient water supply in the Vision for the District to 2042/24 (page 7).**

Infrastructure Strategy

Policy SS6 of the Draft Canterbury District Local Plan (Regulation 19) sets out the infrastructure strategy for the district and outlines that the Council will work with its partners to ensure that necessary infrastructure improvements are delivered at the right time for growth. The introductory text sets out at paragraph 1.71 the proposals for the new reservoir at Broad Oak, however, does not include proposals for the desalination plant. This development is considered critical as part of the resilience and ability for SEW to meet growth demands and as such, SEW requests that the Local Plan includes direct commentary on the desalination plant.

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

SEW welcomes the commitment to work with partners to “ensure that necessary infrastructure improvements are delivered at the right time to support growth” (Policy SS6(1)). **SEW requests that the desalination plant is included in the list of infrastructure projects and should be named specifically, as is the case for Broad Oak at SS6(2j)).**

As set out in Policy DS15, the approach to infrastructure delivery will be underpinned by the Infrastructure Delivery Plan (IDP) (2026). The Regulation 19 Draft Canterbury District Local Plan IDP (March 2026) outlines the infrastructure needed to meet the growth identified in the draft Regulation 19 Local Plan 2042/43 and sets out that the Council will continue to engage with infrastructure providers to support timely delivery. **SEW would welcome ongoing engagement to ensure that their infrastructure delivery commitments can be met.**

The IDP highlights that SEW is largely responsible for supplying freshwater in the District. The proposed development is outlined within the IDP as ‘IE3 – New desalination scheme at Reculver’ with a current timescale for delivery as long-term beyond Local Plan period. SEW are currently expecting the new desalination plant to be fully operational by 2044, in order to accommodate the projected growth in the area and continue to meet demands and provide a reliable water supply. **SEW requests the timescales outlined for the desalination scheme (IE3) within the IDP to be updated to accurately reflect the current schedule.**

Development and Economic Strategy

The Regulation 19 Draft Local Plan development strategy (Policy SS3) outlines that between 2024/25 and 2042/43, provision is made for a minimum of 23,085 new dwellings, while the economic strategy (Policy SS4) for the District sets out site allocations for new business, employment, and commercial space to support economic development.

In line with the infrastructure strategy for the District, a desalination plant is necessary to increase the capacity of the water distribution network and ensure the continued provision of clean water in the area which is necessary to support the projected growth of the District. The desalination plant will be located within and close to SEW’s existing assets, where possible to minimise land-take and disturbance.

Environmental Strategy

Policy SS1 sets out the environmental strategy for the District and how important habitats, landscapes and biodiversity will be protected through the hierarchy of international designations, national designations, and local designations in line with policies DS20, DS21 and DS22.

Policy DS20 sets out that development proposals which may have an adverse impact on the integrity of a site of international importance will not normally be permitted, while Policy DS21 outlines that development which would affect a site of national importance must follow the mitigation hierarchy of avoidance, mitigation, and compensation. The proposed development will be located within proximity of Thanet Coast & Sandwich Bay Ramsar and Special Protection Area (SPA), North East Kent Marine Protected Area (MPA), and Thanet

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122
EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365
WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874
Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH
ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

Coast Site of Special Scientific Interest (SSSI). The proposed development will be sensitively sited in proximity to SEW's existing assets and follow the mitigation hierarchy of avoid, mitigate, compensate as outlined within Policy DS20 and Policy DS21. It is considered that the proposed desalination plant has an overriding public interest to maintain a reliable water supply which can accommodate the projected growth in demand. Under SEW's environmental duties as a statutory water undertaker, appropriate surveys will be undertaken to inform the management of any potential environmental impacts.

SEW recognises the potential for adverse environmental impacts because of the desalination scheme and are committed to ensuring environmental constraints are fully considered as part of the options development. **SEW would welcome a collaborative approach with Canterbury City Council and other stakeholders to ensure the project can be delivered within a timely manner whilst following the mitigation hierarchy and minimising environmental impact.**

Sustainable Design Strategy

The sustainable design strategy for the District (Policy SS2) as outlined within the Regulation 19 Draft Local Plan highlights that all new developments must be designed to reduce climate risks and should maximise energy and water efficiency.

The proposed desalination plant will allow the continued provision of freshwater, reducing the likelihood of water scarcity which is intensified by climate change. The policy also sets out that new development must achieve a high-quality of design, contribute positively to the locality and promote sustainability in line with Policy DS13. The proposed development will be located in proximity to the existing water infrastructure in the area and will be designed to accord with this existing infrastructure. The new desalination plant is required to increase SEW's capacity for water supply and ensure SEW can continue to effectively fulfil its statutory duties in serving the area of Canterbury with a continuous water supply.

SEW welcomes that Canterbury City Council is using a series of monitoring indicators to assess the matters outlined in the Local Plan and determine how the local plan is performing (Chapter 9). **Whilst SEW's progress on its Asset Management Plan delivery will be recognised as a contextual indicator (pg.353), SEW requests that the delivery of strategic infrastructure is added as an additional monitoring indicator due its significance in ensuring the delivery of projected housing and business growth (Chapter 9).**

Historic Environment and Archaeology

Policy DS30 sets out that designated and non-designated heritage assets should be conserved in a manner appropriate to their significance. The proposed development will be sensitively sited within close proximity of existing water infrastructure to minimise any potential significant impacts to the historic environment or archaeology. The policy recognises that if development provides substantial public benefits this can outweigh any potential harm or loss caused. The public benefits of the continued reliable provision of clean

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

water is considered to outweigh any potential minor harm to heritage or archaeological assets. **SEW would like Canterbury City Council to clarify whether the proposed desalination plant to accommodate the continued reliable provision would be considered to deliver significant public benefits.**

Flood Risk

Policy DS23 – Flood Risk: 8 sets out that *‘The Council will work with partners, including Thanet District Council, the Environment Agency, Natural England, Historic England and landowners to investigate and define (if necessary) a Coastal Change Management Area at Reculver, to include the potential extent of coastal retreat’.*

SEW would be willing to collaborate with these partners to ensure desalination plant can be provided whilst also providing Coastal Change Management. Given that the desalination plant needs to be operational by 2044, SEW would be willing to consider a collaborative masterplan approach that is guided by Local Plan Policy to ensure that these projects can be delivered.

Herne Bay Town Centre Strategy

Policy HB1: para 1 outlines that the Council will support improvements to water infrastructure to the benefit of communities and businesses. **SEW supports this approach to water infrastructure within the Herne Bay area, however, requests that the proposed desalination plant is specifically mentioned within this policy due to the required delivery date of the project in 2044.**

Conclusion

Overall, whilst SEW consider the new Local Plan for Canterbury District to be supportive of water infrastructure, it omits recognition of the need for a new desalination plant in the area of Reculver. The requirement for this has been brought forward to meet new government targets on housing growth and accommodate the associated water demand. Therefore, this now needs to be directly addressed within the Canterbury District Local Plan.

SEW is willing to work collaboratively with Canterbury District Council and other relevant stakeholders to deliver this requirement. SEW would be keen to provide further information to be able to ensure that the desalination plant can be included in the strategic plans for Canterbury District.

SEW look forward to ongoing engagement in the plan-making process and to contributing further to the development of a Local Plan that meets the needs of Canterbury’s communities both now and in the future

**Rocfort Road
Snodland
Kent ME6 5AH**

TELEPHONE
0333 000 1122

EMAIL
water@southeastwater.co.uk

EMERGENCY LINE
03330 000 365

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874

Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH

ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People