

PREFACE

To the Planning Inspector,

Only 9 years ago, at the last local plan inspection (2017) , before all the building started, we had beautiful fields not anonymous estates with unaffordable houses. There were trout and, grayling in the Stour in the centre of Canterbury which was crystal clear. Now it is muddy brown with permanent sludge on the bed and surfactants on the surface. Nine years ago, you could eat oysters safely at Whitstable and swim in the sea without getting a skin or stomach infection. People had hope and meaningful employment.

Now we all live in fear of what will be destroyed next. Media shouts you are selfish if you own a house. But actually people who are exposed to nature on the streets; poor without a house and trapped with soulless indoor work, often appreciate nature's beauty even more.

Of course, London will swallow everything in its way and all nature will be destroyed. But do we really have to destroy water as quickly and irreversibly as we are doing?

The Kent Water for Sustainable Growth Study (May 2017) told the Council there wasn't 'headroom' for increased water supply and WwTW for so many new houses and demand. Unless there was major improvement and increase in capacity. That didn't happen. But we were denied the right (Environmental Assessment of Plans and Programmes Regulations , Reg 17) to stop the ecocide. We had to watch powerlessly as the destruction and water pollution went on and got worse and worse.

The RTPI website states planners must be 'fearless' and exercise independent professional judgment and that

*Royal Town Planning Institute, as constituted by Royal Charter, (the 'Chartered Institute') exists to advance the science and art of planning **for the benefit of the public**. To achieve this, the Chartered Institute requires planning professionals to meet and maintain high standards of competence and to conduct themselves in a way that inspires trust and confidence in the profession.*

Will the 2017 Planning Inspection be repeated? Until nothing survives? At this rate it won't be long.

I attach: an 11 page table

(a) WHY THE CANTERBURY DISTRICT LOCAL PLAN 2042/3 IS NOT SOUND and NOT LEGAL
REGULATION 19 REPRESENTATION with appendices

and a longer document:

(b) Urgent clarification without contacts

This is a series of questions on the local *plan-making process* with photographs showing local flooding, water pollution, unsafe building practices and failure to replace vandalised trees on the Howe Barracks new build estate which I sent to the Planning Inspectorate in May 2023, along with contacts in government at that time, in the hope you could support the newly elected Council to do a better job at planning than the last one and also ensure disadvantaged people could take part. I telephoned but was told the Planning Inspectorate does not help at the pre-submission phase, and could look at this with the plan inspection, later.

I would be delighted to talk and to assist with any further information

Kind regards,
Cathy Sales

WHY THE CANTERBURY DISTRICT LOCAL PLAN (2042/3) IS NOT ‘SOUND’ and NOT LEGAL (REGULATION 19 REPRESENTATION)

Author: CATHY SALES

Date: 18.5.2026

SOUNDNESS CRITERION	JUDGMENT	SUPPORTING EVIDENCE	OTHER DOCUMENTS/SOURCES
‘a) positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development’	It is not possible for private companies to build the number of houses required by Westminster within 5 years (this is the definition given by NPPF of ‘objectively assessed needs’) without causing even worse water pollution, flood & drought risk vulnerability; increasing public health risk (water borne disease); decreasing biodiversity& biomass; damaging social well-being & the local economy. Profit driven DWMP plans and WRMP of privatised water industry do not align to Government’s targets. The only way it would be possible to build this housing quota would be to make a cross boundary agreement with a different authority outside the south-east London area which is not water stressed; has brownfield availability; headroom capacity for water supply & WwTW; & employment growth potential for quantity labour force rather low quantity labour force high GVA value service industry .	Appendix A KCC Water Supply and Sustainability Report Nov 2025 Extract: ‘Letter from David Wimble Cabinet Member for (the Kent) Environment and Simon Jones, Corporate Director, Growth, Environment and Transport 4 November 2025 to all electoral divisions: Summary: <i>Kent is one of the driest regions in England with population and economic growth along with climate change putting increasing pressure on the county’s water resources. The results of water stress within the county are expected to cause long term impacts for house building, economic development, tourism and water availability for residents. Water scarcity will also have a negative effect on wildlife and habitats, which form the rich landscape of the county. The development of a 25-year Kent Water Resources Strategy is proposed to address the challenges now and, in the future , and shape how the county can maintain growth whilst protecting water resources for the benefit of the environment and quality of life for the residents of Kent.</i>	Appendix B Extracts <i>Kent Water for Sustainable Growth Study (May 2017)</i> Page 8 1 1.1.1. Study drivers: risk of failure of legal compliance p91 CT2 Canterbury WwTW Figure C3: Canterbury WwTW DWF across plan period and DWF permit exceedance p92 ‘confirmed’ certain continuous sewage discharge into the chalk Great Stour by 2027 (Live sewage maps confirm frequent sometimes continuous sewage discharge in Ashford 2026 https://www.sewagemap.co.uk) Appendix C Baseline Risk Assessment and Vulnerability <i>Southern Water Drainage and waste management plan by river basin catchment</i> https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/extract Appendix D South East Water WRMP no new water for Canterbury until 2033.

			Appendix E Joint letter from Ofwat Defra & EA to South East Water expressing concern supply insecurity in WRZ 8 East Kent.
SOUNDNESS CRITERION	JUDGMENT	SUPPORTING EVIDENCE	OTHER DOCUMENTS/SOURCES
'b) justified – an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence'	Canterbury District is largely rural. There is valuable, but deteriorating 'natural capital' Definition: "the elements of nature that directly or indirectly produce value to people, including ecosystems, species, freshwater, land, minerals, the air & oceans, as well as natural processes & functions" (Natural Capital Committee, 2017)). It has a global role for biomass & biodiversity & provides rare inland fresh water & coastal habitat preserving internationally threatened flora & fauna e.g the Desmoulin whorl snail. Fertile soil, favourable climate, 1000+ year tradition, of farming & ecosystems evolving around farming, means Kent is still nationally strategically important for UK food production: 2/3 of national tree grown fruit & 1/3 strawberries. For the next 5 years there are NO alternative green sites for profit driven (not needs based) housing in Canterbury District. But proportionate evidence shows that Policy R9 local plan and local plan strategies (A), (B),	Kent NATURAL CAPITAL ATLAS: MAPPING INDICATORS https://publications.naturalengland.org.uk/publication/6672365834731520 Part 2 Agriculture Sector Summary <i>Climate Change and Risk Assessment for Kent and Medway</i> June 2020 https://www.kent.gov.uk/__data/assets/pdf_file/0016/111382/CCRIA-for-Kent-and-Medway-part-two-agricultural-sector-summary.pdf , accessed May 2023	Appendix F IUCN red list Desmoulin's whorl snail, Stodmarsh Ramsar fresh water wetland River Stour (Kent) Internal Drainage Board Biodiversity Action Plan (2021-2025) https://rsidb.org.uk/wp-content/uploads/2021/06/2021-RSIDB-BAP.pdf, accessed 17.5.2026

	(C),(D),(E), (left column) are NOT justified		
SOUNDNESS CRITERION	JUDGMENT	POLICY GUIDANCE/ INTERNATIONAL OBLIGATIONS	LEGAL REQUIREMENTS
'b) <i>justified – an appropriate strategy</i> , taking into account the <i>reasonable alternatives</i> and based on proportionate evidence'	South Canterbury Urban extension CA/16/00600 was not delivered in 10 years and Best Value Duty not met. Taxes were spent on legal fees against the public for 2 JR including repaying legal fees, after the most recent JR quashed LA planning consent on 2 grounds (the third was not addressed) Because of direct connection to Stodmarsh wetland a more appropriate alternative would be to deliver economic, social and environmental gains: and increase/restore ecological status of ground and surface water and make aquatic BNGs, tackle water scarcity, mitigate flood risk, capture carbon and explore 'modern economy financial gains: in climate resilience, health innovation and research	NPPF(2024) Chap 11 Making effective use of land para 122. Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan: a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs or, if appropriate, deallocate a site	
c) effective – deliverable over the plan period and <i>based on effective joint working on cross-boundary strategic matters</i> that have been dealt with rather than deferred, <i>as</i>	Although KCC acknowledges the need for a joint strategy. Appendix A <i>KCC Water Supply and Sustainability Report Nov 2025</i> there has been NO effective joint working on the cross- boundary	Transforming our world: the 2030 Agenda for Sustainable Development SDG goal 6 By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated	Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 Article 4 Bodies of water 8 (2) used for the abstraction of drinking water For each drinking water protected area, the programme of measures for the river basin district within

<i>evidenced by the statement of common ground</i>	strategic matter of water management, aquatic BNG, surface, groundwater coastal water protection, ecological restoration, multiple types of flood risk. And no SoCG. It is necessary and should include: all developers, road builders, private water companies, EA, DEFRA, RSIDB, Kentish Stour Partnership; local authorities and DACE ENVIRONMENTAL AND GREENSHANKS who will manage nutrient credit sale. Understanding of Ramsar convention and enforcement within the catchment is urgent if SSSI,SAC Stodmarsh is not to be destroyed completely. Proactive urgent action must be taken to prevent the greatest risks: flood borne asbestos from Stour River Basin flood through Chartham Mill ACTUAL catchment must be understood including groundwater NOT paying hydrologists to use information selectively. . SoCG and action plan must address multiple flood & pollution risks transparently, IN THE PUBLIC INTEREST It must account for green field residential development that has already taken place, is	wastewater and substantially increasing recycling and safe reuse globally' NPPF Ground conditions and pollution c)Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development	which it is located must include measures with the aim of avoiding deterioration in the quality of the water in that area...
---	--	--	---

	taking place, or is planned, including Taylor Wimpey at former Howe Barrack, Saxon Fields, coastal development and new roads		
POLICY R9	WHY THIS IS NOT JUSTIFIED	SUPPORTING EVIDENCE	OTHER DOCUMENTS/SOURCES
Land off Bekesbourne Hill, Littlebourne Planning Application CA/2300484 Appeal reference: 3373183 Up to 300 residential dwellings including affordable housing and older person accommodation), a new community hub, introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation. All matters reserved	Reasons for refusing consent given by Canterbury City Council were justified: (i) RFR 2 adverse impact to a Chalk Stream (ii) (ii) RF3 concern of lack of adequate sewerage disposal Other reasons also justified: Natural England: risk of damage or destruction of SSSI wetland habitat Preston Marshes Concern by River Stour Internal Drainage Board that pump to move surface water would not be maintained, and there would be additional flood risk was justified. Water supply contamination risk from not maintaining pump which pumps surface water away from ground source protection site on lower ground Expert witness statement of RSK hydrologist Director Colin Whittingham failed to evidence lack of environmental harm	Appendix J SSSI harm to Little Stour Appendix K Natural England CD3.53 9.11.2023 Appendix H undefended flood risk Current day	

	and contained a statement he knew to be false. This is under investigation by RSK.		
STRATEGY	WHY THIS IS NOT JUSTIFIED	SUPPORTING EVIDENCE	OTHER DOCUMENTS/SOURCES
STRATEGY (A) Concentrate urban expansion in South Canterbury Put a WwTW on the site of an international pilgrimage route connecting UNESCO world heritage sites in Canterbury to UNESCO world heritage sites in Rome.	(i) Spiritual and cultural heritage of the Via Francigena and ground fed intermittent chalk springs and Nailbourne (ii) Hydrogeology: south of Canterbury is primarily permeable chalk bedrock and Source Protection Catchment area. Under this is the principal aquifer serving the area. North of Canterbury is less permeable - primarily London clay. In much of south Canterbury, the younger layers e.g. Thanet formation are also highly permeable meaning toxic pollutants from construction and urbanisation risk contaminating the aquifer. (iii) there is combined river basin flood plain risk, ground water flood risk, sewer overload flood risk and urban creep surface water flood: all undefended as shown in Appendix G	Appendix G Figure 3-1 Bedrock geology in Kent (Kent Water for Sustainable Growth Study) Appendix H <i>Undefended flood risk current day</i> Source: Strategic Flood Risk Assessment Herrington Aug 2025 Appendix I Mountfield site 1 to 17 000 groundwater vulnerability.pdf Source: DEFRA magic maps	

	(iv) extreme groundwater stress due to overabstraction in this area	J	
STRATEGY	WHY THIS IS NOT JUSTIFIED	SUPPORTING EVIDENCE	OTHER DOCUMENTS/SOURCES
STRATEGY (B) Allocate farmland South south west, south east & east of Canterbury for urban residential development; Policy allocation reference N1,N2,N4,N5, (SLAA151 Merton Park, SLAA128, Langton Lane, SLAA122, Land South of Littlebourne Rd SLAA302 Land South of Bekesbourne Lane	Herrington's independent Sustainability Appraisal judges all these sites have very significant negative impact for sustainability objectives: biodiversity, geology, landscape, clean water, flood risk, heritage sustainability goals. All are also judged to be very significant negative chance of being effective land use - except Merton Park which is undetermined. Sustainable transport plans undetermined in all cases	<i>Appendix J Table 5-7 - Summary SA of proposed housing allocations - Canterbury area</i> CANTERBURY DISTRICT LOCAL PLAN Sustainability Appraisal Report - Draft Canterbury District Local Plan – Focused Consultation (Regulation 18) (2025)	
STRATEGY (C) Carry forward 4,000 house South Canterbury urban extension CA//16/00600 from 2017 local plan Exclude from planning inspection in the 2026 local plan and from strategic flood risk assessment and sustainability/ environmental impact assessment and public comment	Extreme changes in conditions over the last 9 years. Cumulative effect of other greenfield development must be considered. Greater water pollution, and flood & drought vulnerability Changes in legislation e.g. Environment Act; Drainage etc.	National Planning Policy Framework Chapter 3 Plan-making preparation and review para 32' ... the preparation and review of all policies should be underpinned by relevant and up-to-date evidence	National Planning Policy Framework Chapter 9. Promoting sustainable transport 104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that (d) the environmental impacts of traffic and transport infrastructure can be identified Environmental Assessment of Plans and Programmes Regulations (2004) – the public have the right to be informed of plans and comment on their environmental impact of plans.

STRATEGY (D) : ECONOMIC NEEDS POLICY	WHY THIS IS NOT JUSTIFIED	SUPPORTING EVIDENCE	OTHER DOCUMENTS/SOURCES
Construct an economic strategy without considering real life social and ENVIRONMENTAL GAINS. Interpret a 'social gain', as allocating a community hub and economic gain as office space on multiple stand alone carbon urban developments on greenfield Pay a consultancy who specialises in representing carbon heavy construction interests to write a Canterbury Economy Needs Study that fails to identify and reference local strengths, weaknesses, opportunities and threats and use THIS relevant LOCAL data to make useful recommendations for PUBLIC CONSULTATION	The Lichfield report <i>Canterbury Modern Economy Needs Study Final Report 8 October 2025</i> appears partial. It promotes polluting carbon industries: road & house construction, freight. And references irrelevant national data. NO reference to the NPPF/Transforming Our World 2030 Agenda sustainability requirement that economic improvement should cause interconnecting environmental & social welfare improvement or how to achieve this. It fails to recognise specific local Strengths & Opportunities e.g. natural, human & financial capital. And misjudges local 'teaching' & health sector as 'overrepresented', not as Economic Opportunity (global connections + finance, expertise/innovative research in fields needed for the 'modern economy' e.g. clean growth, AI, creative & high tech industries ageing demographic etc. Omission of local Threats: flooding, water pollution including asbestos from Chartham Mill, water	Lichfield used the tilted presumption to legally challenge neighbouring Ashford local planning authority (where sewage discharges into the Great Stour upstream of Canterbury) to gain planning consent for construction interests. They succeeded in gaining planning for a residential housing estate on green field at Appledore in Tenterden, despite concerns of Tenterden Planning committee chairman Cllr John Crawford, who said that the plans would place "unacceptable pressure" on Tenterden, .. <u>would not boost long term economic development or social sustainability, but significantly harm the environment</u> https://www.kentonline.co.uk/tenterden/news/this-is-a-fight-we-do-not-want-to-lose-258897/ Currently Lichfield Ltd appear to be looking forward to using 'nutrient credits' to 'unlock' building. Source: Lichfields blog 11.4.2022: <i>Nutrient neutrality a housing supply headache</i>, accessed 18.5.2026 https://lichfields.uk/blog/2022/april/11/nutrient-neutrality-a-housing-supply-headache This poses an existential threat to Ramsar site SSSI, SAC Stodmarsh wetland in Canterbury District, due to dangerously fluctuating volume of discharge (too much or little) ground water level; discharge of other pollutants e.g. hydrocarbons, microplastics in road run off, which all threaten the site in addition to the	National Planning Policy Framework Chapter 6 Building a strong, competitive economy para 81. Planning policies and decisions should help create the conditions in which businesses can invest, expand & adapt..., <u>taking into account both local business needs & wider opportunities for development.</u> The approach taken should <u>allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.</u> Footnote 42 The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, artificial intelligence and big data; clean growth; future mobility; and catering for an ageing society para 82(a). Planning policies should: set out a clear economic vision & strategy which positively & proactively encourages sustainable economic growth Para 83. Planning policies & decisions should recognise & address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge & data-driven, creative or high technology industries. NPPF Chapter 2 8. Achieving sustainable development means that the planning system has three

	scarcity. Weaknesses: local authority debt; lack of social cohesion, loss of public services; wealth & health gap, coastal underemployment, affordability crisis (food, housing). No relevant positive recommendations	nitrate and phosphates ('nutrients'). in sewage and fertilisers ,	overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)
STRATEGY	WHY THIS IS NOT JUSTIFIED	SUPPORTING EVIDENCE	OTHER DOCUMENTS/LAWS
STRATEGY (E) : HOUSE BUILDING POLICY Follow Government policy guidance on HDT. Prioritise quick, number based delivery by familiar construction companies. Fail to proactively regulate that building regulations are being met. Fail to enforce and respond to public concerns. Accept the mistaken current dogma: Housing Affordability will improve if more houses are built. This outweighs the fact that the construction may cause harm to environment, social well being and cause climate change vulnerability	Houses are bought by those who can afford them; not those who need them and as an investment. This includes foreign equity. They are not 'stock' or a resource in the way that clean water, earth and air is are natural resources for all. To meet housing needs, strategies are needed for social housing and specialist housing for people with high level needs, autism, learning difficulties, dementia, physical and mental health conditions. . It is not lack of stock it is lack of affordability that is the problem. In India people die of starvation outside well stocked shops	<i>'A World Addicted to Hunger'</i> Amartya Sen. Nobel Laureate in economics. Principle of food and housing inequality is the same. Recommendations to meet housing needs (1) Empty Dwelling Management Orders – Local Plan shows that the number of long term empty dwellings is continuing to rise, despite building. (2) Incentives to use empty rooms in private dwellings e.g. retain single person discount if renting rooms to tenants at a below market rate. (3) Incentives for community housing and green energy projects with other partners e.g. Kent Community Housing Hub, Rural and Community Housing and Enablement (RACE). (4) More liaison with prisons, social services, mental hospitals, military who release from institutions to homelessness	Appendix I: tents of long term homeless behind Alma student accommodation Military Road Canterbury Care Act (2014) <i>The Homelessness (Priority Need for Accommodation) (England) Order 2002</i> Vulnerability: institutional backgrounds 5.—(1) A person (other than a relevant student) who has reached the age of twenty-one and who is vulnerable as a result of having been looked after, accommodated or fostered. (2) A person who is vulnerable as a result of having been a member of Her Majesty's regular naval, military or air forces. (3) A person who is vulnerable as a result of— (a) having served a custodial sentence (within the meaning of section 76 of the Powers of Criminal Courts (Sentencing) Act 2000

STRATEGY (F)	WHY THIS IS NOT JUSTIFIED	SUPPORTING EVIDENCE	OTHER DOCUMENTS/SOURCES
Use sales of public assets e.g. providing services to disadvantaged groups to pay local authority debts, with minimal cross boundary and public consultation	Downward debt spiral. Increased anti social, criminal & self-harming behaviours of disadvantaged groups no longer cared for by the LA. Affects: local economy, retail, business, academic, leisure & tourist. Further demand on health care & social services which lack capacity.	.	Appendix J Photograph 17.5.2026 Riverside Youth Club Canterbury boarded up
SOUNDNESS CRITERION	JUDGMENT	POLICY GUIDANCE NOT MET	
d) consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this framework and other statements of national planning policy, where relevant	It is IMPOSSIBLE to deliver sustainable development due to: unrealistically high national housing delivery targets not aligned to water infrastructure; loss of national control of the privatised water industry, lack of oversight & enforcement of environmental & governance standards. Tilted presumption, adversarial legal system & financial resources of construction interests. This has led to a dangerous and unstable situation posing an existential threat to water, the environment, economy public health & social well-being. And is resulting in DAILY failures to accord with legal requirements and international obligations	NPPF Chap 2 Achieving sustainable development para 8 8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure ; b) a social objective – to support strong, vibrant and healthy communities... c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.	Appendix L Graphic illustrating the difference between virtuous and vicious cycle feedback loop of sustainable and unsustainable development

	Appendix M contrasts vicious cycle and virtuous cycle feedback loop of unsustainable and sustainable planning	1(a) all plans should promote a sustainable pattern of development that...seeks to <i>align growth to infrastructure;</i>	
LAW / Obligation (not exhaustive)	ISSUE	KEY PROVISION	KEY DOCUMENT
The Conservation of Habitats and Species Regulations 2017 The Ramsar 'Convention on Wetlands of International Importance' (1971) The Bathing Water Regulations 2013 Salmon and Freshwater Fisheries Act (1975) Best Value Duty Environmental Assessment of Plans and Programmes Regulations (2004) Regulation 17 (Regulation 17 monitor the significant environmental effects of the implemented plan, identify unforeseen adverse effects at an early stage and to undertake any necessary remedial action	Some Stodmarsh lakes already suffering eutrophication. The rest are at existential risk from the belief that the only form of pollution that is of concern are nitrates and phosphates and these can continue to be discharged as usual by buying a nutrient credit.	Ramsar resolution XV.26 <i>Water, water-related and water-management-related matters</i> '12. RECOGNIZING the <i>importance of the whole water cycle</i> and the <u><i>link existing between ground and surface water</i></u> for their use and management, not only in arid and semi-arid regions but also <u><i>in humid regions;</i></u> 13.TAKING INTO ACCOUNT the urgent need to decrease the loss and degradation of aquatic ecosystems through policies of sustainable development and conservation of biodiversity; 14. <i>ALSO TAKING INTO ACCOUNT that maintenance of the ecological integrity of most wetlands, is closely linked to the supply of groundwater;</i> 15. AWARE of the importance that the use of groundwater has had for the economic development and improvement of welfare in many regions ... 16. <i>EQUALLY AWARE of the negative impact that can be caused to wetlands because of UNCONTROLLED DEVELOPMENT and lack of planning for groundwater</i>	Appendix M 15th meeting of the Conference of the Contracting Parties to the Convention on Wetlands "Protecting wetlands for our common future" Victoria Falls, Zimbabwe, 23-31 July 2025

From: **David Wimble, Cabinet Member for (the Kent) Environment**
Simon Jones, Corporate Director, Growth, Environment and Transport

To: **Environment and Transport Cabinet Committee, 4 November 2025**

Subject: **Development of a Kent Water Resources Strategy**

Classification: **Unrestricted**

Past Pathway of report: N/A

Future Pathway of report: N/A

Electoral Division

All electoral divisions

Summary: Kent is one of the driest regions in England with population and economic growth along with climate change putting increasing pressure on the county's water resources. The results of water stress within the county are expected to cause long term impacts for house building, economic development, tourism and water availability for residents. Water scarcity will also have a negative effect on wildlife and habitats, which form the rich landscape of the county. The development of a 25-year Kent Water Resources Strategy is proposed to address the challenges now and, in the future, and shape how the county can maintain growth whilst protecting water resources for the benefit of the environment and quality of life for the residents of Kent.

Recommendation(s):

The Cabinet Committee is asked to note the paper and support the development of a Kent Water Resources Strategy

1. Introduction

- 1.1 Kent is one of the driest regions in England, and climate change is intensifying the pressure on its water resources. The county is experiencing warmer, wetter, winters and hotter, drier summers, which are impacting both the quality and availability of water.
- 1.2 The Environment Agency projects a national water shortfall of nearly 5 billion litres per day by 2050. Parts of Kent are already classified as experiencing moderate to serious water stress, where water demand exceeds the effective rainfall available. Areas under serious stress include Folkestone & Hythe, Dover, Thanet, Swale, Gravesham, and Sevenoaks.
- 1.3 National population growth is expected to reach 7.3% by mid-2032, with Kent and Medway anticipating significant increases in both population and economic activity. This growth will drive demand for new housing,

employment, and infrastructure, placing further strain on water supply systems.

- 1.4 Water stress in Kent poses long-term risks to housing development, economic growth, tourism, and everyday water access for residents. It also threatens the county's rich natural habitats and biodiversity.
- 1.5 Kent County Council has, over the previous 10 years, worked to develop and deliver water resource projects, build strategic partnerships with key stakeholders and understand the risks and challenges for securing water resources.
- 1.6 Using this platform, it is proposed that KCC works with strategic partners to develop a shared Water Resources Strategy for the county that looks at how we will manage the long-term risk to water resources.

2. Developing a Kent Water Resources Strategy

- 2.1 Kent is a diverse county with a high-quality environment, varied towns and rural landscapes. These resources and assets are valued by residents, business and visitors alike, providing significant benefits to the county's economy and the health and wellbeing of its residents.
- 2.2 However, the county has experienced numerous drought events since the 1970s. Projected climate change and population growth will increase water demand while decreasing water available for supply.
- 2.3 Significant investment will be needed to balance future supply and demand in Kent – depending on the climate path, level of population growth and the mitigation action taken, projections suggest an additional 1.5 – 2.6 billion litres per day will be needed by 2080 in the South East.
- 2.4 These figures do not represent a hard line but will be realised incrementally year-on-year, with the impacts being felt on the public water supply and high-water consumption sectors.
- 2.5 Unless more is done to balance water supply and demand, droughts are likely to pose an increasing threat for soft and top fruit and salad production (Kent's main irrigated crops) in summer months, particularly where they rely on high levels of irrigation from river abstraction, reservoirs and groundwater sources.
- 2.6 Kent County Council funded the National Institute of Agricultural Botany East Malling Research (NIAB EMR) to support advances in horticulture, including irrigation technology and water harvesting on polytunnels. Kent County Council is also a member of the Holistic Water for Horticulture project working with the horticulture industry. However, water scarcity remains a very real and increasing risk for this sector and the associated economy within Kent.
- 2.7 Water is essential for healthy, thriving ecosystems in Kent. By protecting and improving water supply and quality available for natural ecosystems, we will ensure habitats can thrive and continue to be attractive and appealing spaces to relax and enjoy for visitors to the county.

- 2.8 The regional Water Resources South East group (WRSE) is an alliance of the six water companies in South East England. Taking a collaborative approach, it has developed a multi-agency regional resilience plan *Futureproofing our water supplies June 2025* with stakeholders along with developing a long-term strategy for demand minimisation and supply maximisation measures to maintain a sustainable water supply.
- 2.9 However, there remains a need for a Kent focused strategy for water resources that clearly sets out the challenges and opportunities for the county to secure sustainable water resources for residents, business and the environment.
- 2.10 The strategy will align with the 6 Goals of the Environment Plan and support delivery of the Local Nature Recovery Strategy and the Local Flood Risk Management Strategy. The strategy will focus on four key areas –
- **Integrated Water Planning:** Embed water resource considerations into spatial planning and infrastructure development.
 - **Demand Management:** Promote water efficiency measures across sectors, including domestic, public, commercial, and agricultural use.
 - **Investment in Resilience:** Support innovation and investment in water recycling, storage, and supply infrastructure including nationally significant infrastructure projects.
 - **Environmental Protection:** Safeguard ecosystems through catchment-based approaches and nature-based solutions.

3. Financial Implications

- 3.1 The strategy will be developed by a base funded member of staff, so it is not considered to present any additional pressure on the budget.

4. Legal implications

- 4.1 Developing a Kent Water Resources Strategy is not expected to have legal implications for Kent County Council.

5. Equalities implications

- 5.1 An EqIA screening will be completed as part of the draft Kent Water Resources Strategy in advance of undertaking a public consultation and reviewed following the consultation process.

6. Other corporate implications

- 6.1 There are no specific implications on other areas of KCC. However, delivering the Strategy will require support from other areas of KCC. There are no expectations for any additional spending.

7. Conclusions

- 7.1 KCC is proposing to work with strategic partners to develop a shared 25-year Kent Water Resources Strategy, which can bring together existing strategies, plans and projects to support water security for Kent. A coordinated, forward-

From: **David Wimble, Cabinet Member for (the Kent) Environment**
Simon Jones, Corporate Director, Growth, Environment and Transport

To: **Environment and Transport Cabinet Committee, 4 November 2025**

Subject: **Development of a Kent Water Resources Strategy**

Classification: **Unrestricted**

Past Pathway of report: N/A

Future Pathway of report: N/A

Electoral Division

All electoral divisions

Summary: Kent is one of the driest regions in England with population and economic growth along with climate change putting increasing pressure on the county's water resources. The results of water stress within the county are expected to cause long term impacts for house building, economic development, tourism and water availability for residents. Water scarcity will also have a negative effect on wildlife and habitats, which form the rich landscape of the county. The development of a 25-year Kent Water Resources Strategy is proposed to address the challenges now and, in the future, and shape how the county can maintain growth whilst protecting water resources for the benefit of the environment and quality of life for the residents of Kent.

Recommendation(s):

The Cabinet Committee is asked to note the paper and support the development of a Kent Water Resources Strategy

1. Introduction

- 1.1 Kent is one of the driest regions in England, and climate change is intensifying the pressure on its water resources. The county is experiencing warmer, wetter, winters and hotter, drier summers, which are impacting both the quality and availability of water.
- 1.2 The Environment Agency projects a national water shortfall of nearly 5 billion litres per day by 2050. Parts of Kent are already classified as experiencing moderate to serious water stress, where water demand exceeds the effective rainfall available. Areas under serious stress include Folkestone & Hythe, Dover, Thanet, Swale, Gravesham, and Sevenoaks.
- 1.3 National population growth is expected to reach 7.3% by mid-2032, with Kent and Medway anticipating significant increases in both population and economic activity. This growth will drive demand for new housing,

employment, and infrastructure, placing further strain on water supply systems.

- 1.4 Water stress in Kent poses long-term risks to housing development, economic growth, tourism, and everyday water access for residents. It also threatens the county's rich natural habitats and biodiversity.
- 1.5 Kent County Council has, over the previous 10 years, worked to develop and deliver water resource projects, build strategic partnerships with key stakeholders and understand the risks and challenges for securing water resources.
- 1.6 Using this platform, it is proposed that KCC works with strategic partners to develop a shared Water Resources Strategy for the county that looks at how we will manage the long-term risk to water resources.

2. Developing a Kent Water Resources Strategy

- 2.1 Kent is a diverse county with a high-quality environment, varied towns and rural landscapes. These resources and assets are valued by residents, business and visitors alike, providing significant benefits to the county's economy and the health and wellbeing of its residents.
- 2.2 However, the county has experienced numerous drought events since the 1970s. Projected climate change and population growth will increase water demand while decreasing water available for supply.
- 2.3 Significant investment will be needed to balance future supply and demand in Kent – depending on the climate path, level of population growth and the mitigation action taken, projections suggest an additional 1.5 – 2.6 billion litres per day will be needed by 2080 in the South East.
- 2.4 These figures do not represent a hard line but will be realised incrementally year-on-year, with the impacts being felt on the public water supply and high-water consumption sectors.
- 2.5 Unless more is done to balance water supply and demand, droughts are likely to pose an increasing threat for soft and top fruit and salad production (Kent's main irrigated crops) in summer months, particularly where they rely on high levels of irrigation from river abstraction, reservoirs and groundwater sources.
- 2.6 Kent County Council funded the National Institute of Agricultural Botany East Malling Research (NIAB EMR) to support advances in horticulture, including irrigation technology and water harvesting on polytunnels. Kent County Council is also a member of the Holistic Water for Horticulture project working with the horticulture industry. However, water scarcity remains a very real and increasing risk for this sector and the associated economy within Kent.
- 2.7 Water is essential for healthy, thriving ecosystems in Kent. By protecting and improving water supply and quality available for natural ecosystems, we will ensure habitats can thrive and continue to be attractive and appealing spaces to relax and enjoy for visitors to the county.

- 2.8 The regional Water Resources South East group (WRSE) is an alliance of the six water companies in South East England. Taking a collaborative approach, it has developed a multi-agency regional resilience plan *Futureproofing our water supplies June 2025* with stakeholders along with developing a long-term strategy for demand minimisation and supply maximisation measures to maintain a sustainable water supply.
- 2.9 However, there remains a need for a Kent focused strategy for water resources that clearly sets out the challenges and opportunities for the county to secure sustainable water resources for residents, business and the environment.
- 2.10 The strategy will align with the 6 Goals of the Environment Plan and support delivery of the Local Nature Recovery Strategy and the Local Flood Risk Management Strategy. The strategy will focus on four key areas –
- **Integrated Water Planning:** Embed water resource considerations into spatial planning and infrastructure development.
 - **Demand Management:** Promote water efficiency measures across sectors, including domestic, public, commercial, and agricultural use.
 - **Investment in Resilience:** Support innovation and investment in water recycling, storage, and supply infrastructure including nationally significant infrastructure projects.
 - **Environmental Protection:** Safeguard ecosystems through catchment-based approaches and nature-based solutions.

3. Financial Implications

- 3.1 The strategy will be developed by a base funded member of staff, so it is not considered to present any additional pressure on the budget.

4. Legal implications

- 4.1 Developing a Kent Water Resources Strategy is not expected to have legal implications for Kent County Council.

5. Equalities implications

- 5.1 An EqIA screening will be completed as part of the draft Kent Water Resources Strategy in advance of undertaking a public consultation and reviewed following the consultation process.

6. Other corporate implications

- 6.1 There are no specific implications on other areas of KCC. However, delivering the Strategy will require support from other areas of KCC. There are no expectations for any additional spending.

7. Conclusions

- 7.1 KCC is proposing to work with strategic partners to develop a shared 25-year Kent Water Resources Strategy, which can bring together existing strategies, plans and projects to support water security for Kent. A coordinated, forward-

looking strategy is essential to strengthen partnerships to ensure Kent's water resilience, support sustainable growth and protect the unique environment and landscape for the future.

8. Recommendation(s):

The Cabinet Committee is asked to note the paper and support the development of a Kent Water Resources Strategy

9. Contact details

Report Author:
Louise Smith
Flood and Water Manager
03000 414 829
Louise.Smith@kent.gov.uk

Relevant Director:
Matt Smyth
Director of Environment and Circular
Economy
03000 416 676
Matthew.Smyth@kent.gov.uk

looking strategy is essential to strengthen partnerships to ensure Kent's water resilience, support sustainable growth and protect the unique environment and landscape for the future.

8. Recommendation(s):

The Cabinet Committee is asked to note the paper and support the development of a Kent Water Resources Strategy

9. Contact details

Report Author:
Louise Smith
Flood and Water Manager
03000 414 829
Louise.Smith@kent.gov.uk

Relevant Director:
Matt Smyth
Director of Environment and Circular
Economy
03000 416 676
Matthew.Smyth@kent.gov.uk

Kent Water for Sustainable Growth Study

Kent County Council

Project Number: 60487848

May 2017

1.1.1 Study drivers

Housing and economic growth poses specific risks to the water environment, driven by the demand created for additional water supply and need for wastewater management. Additional demand needs to be met, in part, from abstraction from existing groundwater or surface water resources, or through the development of new resources with the potential to impact on the integrity of the resources and the aquatic ecosystems which rely on them.

In addition, wastewater generated by new development needs to be treated and returned to the environment without adversely impacting on the water quality and aquatic ecosystems of water bodies receiving treated flows.

There are a number of drivers behind the WfSG study, the three key drivers being the need to manage water scarcity, the need for legislative compliance related to the water environment, and to inform strategic planning. These are summarised in the following section, and more detail on the specific water environment pressures is set out in Section 3.3.

1.1.1.1 Water availability

Some areas within Kent have been classified by the Environment Agency as at Moderate or Serious Water Stress⁴, meaning either the current household demand for water is high as a proportion of the current effective rainfall available to meet that demand; or, the future household demand is likely to be a high proportion of the effective rainfall available to meet that demand. Areas of serious stress are located within the LPAs of Shepway, Dover, Thanet, Swale, Gravesham, and Sevenoaks. This classification process already requires water companies operating in areas of serious stress to evaluate the effectiveness of, and need for, compulsory metering. Growth is a key factor in influencing current and future classifications of water stress in the study area.

Additionally, the Kent SRA identified that changes in land use, and climate change as well as population growth, are likely to exacerbate water availability and increase the economic impact of water scarcity within key catchments within Kent. It also highlighted that attainment of water related legislative standards may be compromised.

1.1.1.2 Legislative compliance

Compliance with statutory environmental regulation is a key driver for the WfSG study. Abstraction needed to support demand for water supply has the potential to impact on status of water bodies which are protected under the Water Framework Directive (WFD⁵) and associated UK regulations. It also has the potential to impact on water dependent designated ecological sites under the Birds Directive⁶, Habitats Directive⁷ and associated UK regulations. Increased treated wastewater discharges also has the potential to impact WFD status of water bodies (including designated shellfisheries), the condition of designated sites and the Birds and Habitats Directives and the quality of bathing waters designated under the Bathing Waters Directive⁸. There is a need to ensure that water bodies and designated sites can be adequately protected.

1.1.1.3 Strategic planning

Understanding the spatial extent of pressures on the water environment, both in terms of where existing pressures are greatest and where future pressures will be most realised is a key driver for the study. It is a requirement of the NPPF that Local Plans set out strategic priorities (including policies) to deliver “The provision of infrastructure for... water supply, wastewater”⁹ and the accompanying Planning Practice Guidance (PPG) provides detailed guidance on how local plan making should consider requirements related to water supply, wastewater and water quality¹⁰. The WfSG study provides evidence that the requirements of the NPPF and PPG have been considered in the Local Plan process. In so doing, the study will help to ensure that early steps can be made in both the spatial planning process and the process of planning water services infrastructure (wastewater treatment provision and new water resource provision) by water companies to jointly deliver sustainable water solutions.

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf

⁵ http://ec.europa.eu/environment/water/water-framework/index_en.html

⁶ http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm

⁷ http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

⁸ <http://ec.europa.eu/environment/water/water-bathing/summary.html>

⁹ The National Planning Policy Framework, Paragraph 156 -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁰ <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>

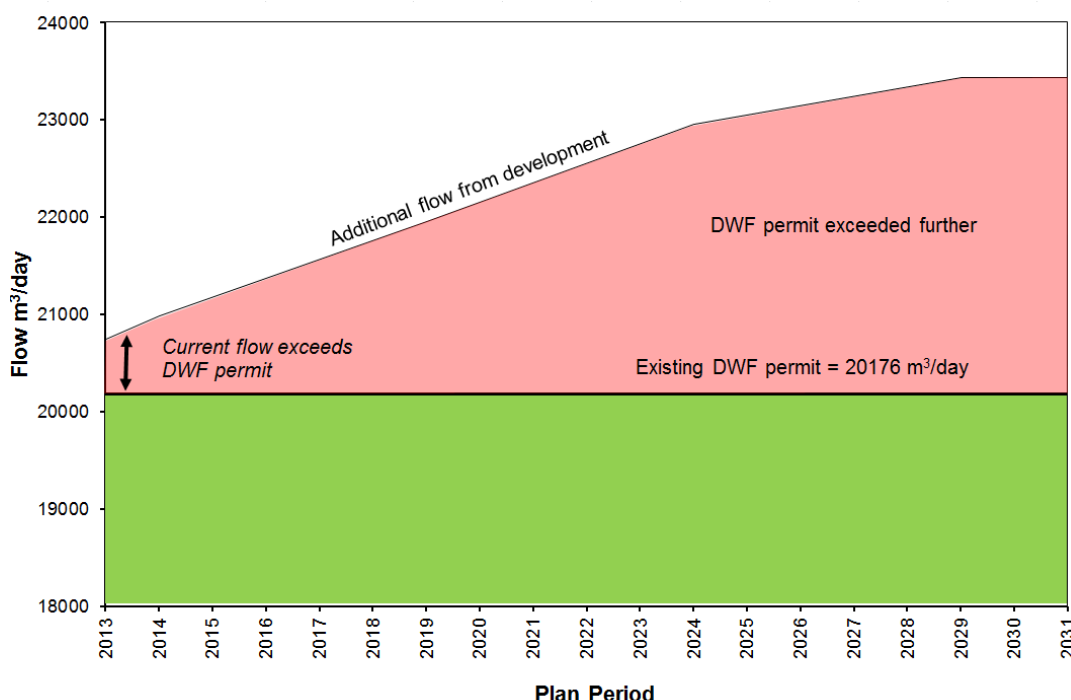
C.2 Canterbury WwTW

Headroom phasing

The headroom assessment has demonstrated that Canterbury WwTW does not currently have sufficient flow headroom in its existing discharge permit to accept development⁸⁵. In addition, according to data provided by Southern Water, the WwTW is already exceeding its existing DWF permit as shown in Figure C3.

Therefore, until additional flow headroom can be made available at the WwTW, any development connecting to the WwTW would result in the existing DWF permit being exceeded further, and by a total volume of 3258 m³/d (equivalent to approximately 11092 dwellings) by the end of the plan period.

Figure C3: Canterbury WwTW DWF across plan period and DWF permit exceedance



Environmental baseline

Canterbury WwTW discharges to the Great Stour and forms part of the Stour catchment. The Great Stour (section between the A2 and West Stourmouth) currently has an overall waterbody status of 'Moderate', with the alternative objective to maintain 'Moderate' status by 2021. Its current overall status is limited to 'Moderate' due to the 'Moderate' status of fish, 'Poor' status of Phosphate and 'Moderate or less' status of surface water in the supporting elements of the mitigation measures assessment. The current status for ammonia is 'High' and the waterbody does not have a status for BOD.

WFD compliance – No Deterioration

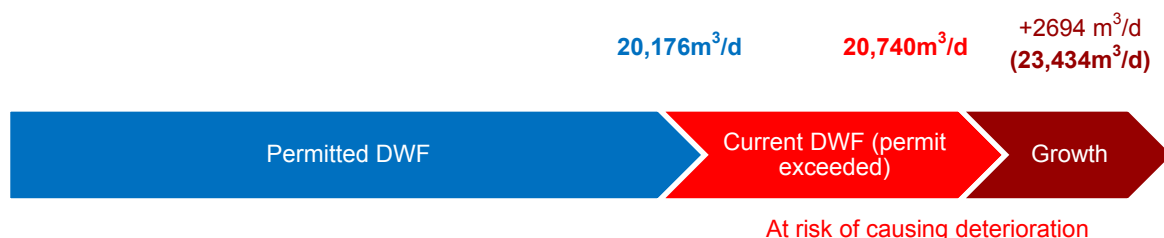
As Canterbury WwTW discharges to the freshwater Great Stour, a range of scenarios have been modelled to check for compliance with the WFD objectives in terms of permit conditions for ammonia and phosphate. A load standstill calculation has been used to determine the future BOD permit conditions.

RQP Modelling has been undertaken, taking into account increased wastewater flows from development, to determine what ammonia and phosphate quality conditions would be required to ensure no deterioration in

⁸⁵ It is understood that Southern Water may have more recent DWF data that was not available to this study, this indicates that the site may be below its current permit level for dry weather flow, indicating some potential capacity. This may change the point in the future when the permit condition may be exceeded but does not change the assessment and conclusions of the water quality assessment.

ammonia and phosphate status. RQP Modelling has been undertaken, taking into account increased wastewater flows from development, to determine the ammonia and phosphate quality conditions that would be required to ensure no deterioration in ammonia and phosphate status. Figure C4 demonstrates where the risk of deterioration arises in relation to increasing flow.

Figure C4: Canterbury WwTW DWF permit, DWF permit exceedance and additional DWF from growth



The results showed that a new phosphate quality condition (above LCT) on the discharge permit would be required to ensure no deterioration in status, but that the existing ammonia quality condition on the permit could be retained.

The results of the load standstill calculation for BOD showed that a revised (tighter) BOD quality condition on the discharge permit would be required and would maintain the current BOD quality downstream. The tighter BOD quality condition can also be achieved with current conventional treatment technology (within limits of conventional treatment).

WFD compliance – Achieve Future Target Status

The Great Stour has an alternative objective of 'Moderate' Ecological set by the Environment Agency in place of an objective to reach 'Good' Ecological status. The alternative objective has been set due to the need for a technically infeasible solution to resolve the less than 'Good' status of phosphate as well as fish and surface water mitigation measures.

The RNAG as outlined in the South East RBMP (which includes catchments draining the Stour), relevant to the Great Stour have been provided in Table C2.

Table C2: Reasons for not achieving good status on the Great Stour (between A2 and West Stourmouth) (GB107040019743)

Category	Activity	Activity Certainty	Classification Element	Objective
Agriculture and rural land management	Mixed agricultural	Probable	Phosphate	Moderate by 2027
Agriculture and rural land management	Mixed agricultural	Probable	Phosphate	Moderate by 2027
Urban and transport	Drainage - mixed	Suspected	Phosphate	Moderate by 2027
Water Industry	Sewage discharge (continuous)	Confirmed	Phosphate	Moderate by 2027

The Great Stour currently has high phosphorus concentrations attributable to surrounding agricultural land uses and point sources of wastewater discharge, including drainage from urban areas and transport. The high nutrient concentration as a result of these activities has also had an impact on the biological quality of the waterbody, specifically on the fish populations, preventing the waterbody from achieving 'Good' Ecological status.

To determine whether growth itself is a barrier to attaining a future 'Good' target for phosphate, modelling was carried out. For both current and future discharge quality required phosphate was below LCT demonstrating that it is not growth limiting attainment of Good Status, but the limits of currently available treatment technologies.

Problem Characterisation

Canterbury (CANT)

This document describes the causes of the risks identified by the Baseline Risk and Vulnerability Assessment (BRAVA). The BRAVA results for this catchment are summarised in Table 1. The results indicate that flooding, pollution and water quality are the main concerns in this wastewater catchment. We have completed risk assessments for 2050 where we have the data and tools available to do so. For the other planning objectives, we will explore how we can predict future risks for the next cycle of DWMPs. All the risk assessment methods need to be reviewed after the first DWMPs have been produced with a view to improve the methods and data for future planning cycles.

Table 1: Results of the BRAVA for Canterbury wastewater system

Planning Objectives		2020	Driver	2050
1	Internal Sewer Flooding Risk	2	Customer	
2	Pollution Risk	1	Operational	
3	Sewer Collapse Risk	1	Operational	
4	Sewer Flooding in a 1 in 50-year storm	1	Hydraulic	1
5	Storm Overflow Performance	0	-	0
6	WTW Water Quality Compliance	0	-	0
7	Flooding due to Hydraulic Overload	2	Hydraulic	2
8	WTW Dry Weather Flow Compliance	0	-	1
9	Good Ecological Status / Good Ecological Potential	2	Operational	
10	Surface Water Management	1	Hydraulic	
11	Nutrient Neutrality	1	Unknown	2
12	Groundwater Pollution	1	Operational	
13	Bathing Waters	NA	-	
14	Shellfish Waters	NA	-	

Key

BRAVA Risk Band	
NA	Not Applicable*
0	Not Significant
1	Moderately Significant
2	Very Significant

*No issues relevant to planning objective within Wastewater System

Catchment Investment Strategy

The risks identified in this wastewater catchment mean that we have assigned the following investment strategy:

Improve

This means that we consider that the current performance of the drainage and wastewater system needs to be improved to reduce the impacts on our customers and/or the environment. We will plan investment to reduce the current risks by actively looking to invest capital funding in the short term to address current performance issues (and consider future risks when implementing improvements).

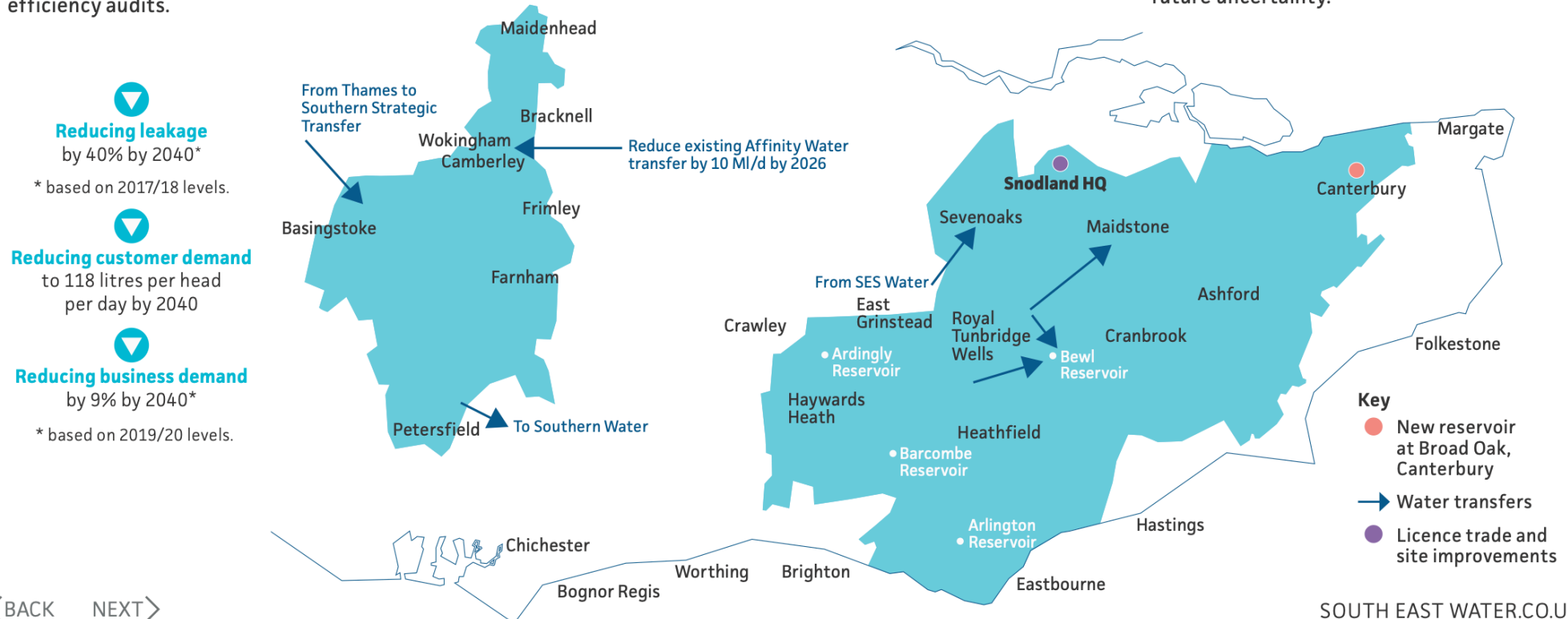
Plan highlights continued

Our Preferred Plan

Our Preferred Plan sets out to achieve the following:

2025 to 2040

- ▶ Leak reduction and water efficiency activities – saving an additional 34 million litres of water a day.
- ▶ A new smart meter installation programme with trials starting in 2025 and a full roll out from 2027 onwards, with the goal of providing smart meters across 90 per cent of our households by 2035.
- ▶ Reduce non-household consumption with measures such as business smart meters and water efficiency audits.
- ▶ New pipelines to increase the amount of water moving between water companies and within our supply area.
- ▶ A new reservoir at Broad Oak (Kent) by 2033 – to provide an additional 22 million litres of water a day while reducing abstractions on groundwater water sources.
- ▶ A new groundwater source, via a licence trade near Maidstone (Kent) by 2040.
- ▶ Sub-zonal schemes to improve our network connectivity at a local level and allow the reduction of our abstractions that could impact on the environment.
- ▶ Further development work and early feasibility studies on schemes such as New Arlington reservoir, Peacehaven recycling and Reculver desalination to ensure we are ready, if needed, to adapt to future uncertainty.





Department
for Environment
Food & Rural Affairs

Regulation and Strategy Director
South East Water

Sent by e-mail only.

Date: 17 November 2025

Dear [REDACTED],

South East Water WRMP Annual Review 2025

Thank you for South East Water's water resource management plan (WRMP) Annual Review 2025. The delivery of your WRMP is essential, and part of your legal duties, in providing resilient water services for customers and protecting and enhancing the water environment.

We are writing this letter to you jointly from Defra, the Environment Agency and Ofwat. The Environment Agency and Ofwat (the Regulators) have assessed your WRMP Annual Review 2025 and have highlighted serious concerns with South East Water's security of supply. You should take immediate action to address the issues that are set out in this letter. Escalation of WRMP non-delivery could include investigations and enforcement by the relevant regulators.

Our concerns are set out in further detail in the table in Annex 1. In summary, South East Water has:

- reported a negative supply-demand balance (SDB) in two water resource zones (WRZs), and your overall SDB is 48% lower than forecast in your WRMP24
- reported distribution input 7.6% above forecast which is a result of higher than forecast leakage (29.3%), PCC (per capita consumption) (2.7%) and non-household demand (4.3%)
- had above forecast leakage for 3 consecutive years and it is currently at the highest it has been during Asset Management Period 7 (AMP7). Significant reductions will be required over the next two years to meet the Environmental Improvement Plan (EIP) interim leakage target for 2026/27
- shown significant resilience concerns during dry weather with supplies being restricted due to high demand.

Following the Annual Review, you submitted further information regarding resource zone 4, including an options appraisal and a proposed set of solutions to address the supply deficit which is currently being met by unplanned abstraction. Your proposed solution does not fully solve the deficit under dry conditions and may have an unacceptable potential impact on the environment. It also includes a proposed reduction in the Level of Service in the resource zone with risks to security of supply. The Environment Agency will meet with you this year to discuss your proposals for resource zone 4 specifically.

This marks the fourth consecutive year that South East Water has received a joint letter from the regulators. While we acknowledge that some areas are beginning to show signs of improvement, progress has been significantly delayed, and it is imperative that South East Water accelerates its response.

To support this, we will continue the established series of biannual meetings between South East Water and senior representatives from Defra, the Environment Agency, and Ofwat. These meetings will take place in December and April, and you will be expected to provide a detailed update on the progress made against South East Water's agreed actions.

We are also aware of other ongoing engagements with regulators, such as regular liaison meetings, where we will continue to monitor performance. Where appropriate, we may seek to align these meetings to ensure a coordinated approach.

The actions we require you to take to address these concerns are set out in the table at Annex 1. You should provide us with written evidence of these actions by the deadlines set out in Annex 1.

Levels at Ardingly reservoir fell below emergency storage this autumn, leading to risks to supplies for 228,000 customers. We expect you to review the resilience of this zone and consider any implications for your drought plan.

South East Water's WRMP is an essential plan for securing customers' water supplies, in a sustainable way for the environment. It is therefore vital for you to maintain and deliver your plan.

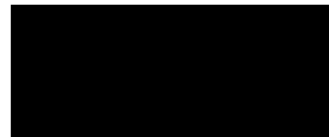
Yours sincerely




**Deputy Director,
Water Resources
Management,
Environment Agency**




**Senior Director,
RAPID & Environmental
Planning,
Ofwat**




**Deputy Director,
Water Sector Delivery,
Defra**

Annex 1:

The following table outlines the issues we have identified, the impact and the actions we require you to take. The table includes reference to the dry year uplifted data reported in South East Water's Annual Review 2025.

Issue	Impact	Action and deadline
Supply demand balance Whilst your reported company level SDB of 46.59 MI/d is in surplus, it is significantly lower than your WRMP24 forecast of 90.42 MI/d. You have also reported dry year adjusted value deficits in water resource zones (WRZ) WRZ2 and WRZ8. In WRZ8, reported actual deficits are above your WRMP24 planned headroom and you have not provided sufficient details for resolving this deficit. The supply demand balance in WRZ4 is currently being maintained by unplanned abstraction at the Greywell and Itchel sources, which were due to respectively be switched off and significantly reduced in March 2025 due to their environmental impacts.	Your reported supply deficit and unplanned abstraction reduce our confidence in your ability to: • provide a secure supply of water • support planned growth • maintain abstraction to levels that will not risk causing deterioration in the status of water bodies	You should: • provide an explanation of the exact causes of the SDB deficit within WRZ2 and WRZ8 as required per annual review guidance • provide to Defra/EA/Ofwat a detailed action plan as to how you intend to bring the SDB in water resource zones WRZ2 and WRZ8 in line with your WRMP24 forecast. You should follow the specific action plan section of the water resources management plan annual review guidance when writing your action plan. The plan should include details regarding how you plan to address the underlying causes of your SDB deficit, including actions on leakage, PCC, outage and DI. • include targeted performance levels for the items above at 6-monthly intervals to profile your recovery to WRMP24 levels • include the expected benefits, associated timescales and associated activity levels (where appropriate) for each action • continue to work with us on the appraisal and selection of options to meet the

Issue	Impact	Action and deadline
		supply deficit in WRZ4. The Environment Agency will meet with you to discuss your proposed solution in December. • as part of the action plan to resolve the SDB deficit you should consider if your WRMP24 needs to be revised and include any WRMP revision as part of the scope of the action plan tasks if necessary • deliver the action plan according to the timelines you have set out • Review your RZ2 resilience and actions to improve it. Consider any updates that are needed to your drought plan as a result of the issues in RZ2 • provide an update on progress with delivery of the action plan and your performance against WRMP24 forecasts for SDB to Defra/EA/Ofwat in December 2025 and April 2026 at the Joint Regulator meetings and at the Quarterly Director Meetings throughout 2025-26. Deadline: 6 weeks after the issued letter date
Deployable output and supply scheme delivery Your reported company-level Deployable output of 587.78 MI/d is 4.7% below your WRMP24 forecast of 616.73 MI/d.	The lower than forecasted deployable output is contributing to reported deficits in WRZ2 and therefore security of supply for customers.	You should: • provide and deliver a detailed programme of works to resolve the supply deficit caused by the Cookham WTW outage as well as mitigate risks emerging at West

Issue	Impact	Action and deadline
Within WRZ4 deployable output has been significantly reduced by 18.68 Ml/d due to long term unplanned outage at Cookham WTW due to water quality issues (nitrates), and West Ham WTW also emerging as similarly at risk. The planned AMP7 Surrey Hills to Fleet transfer has also been significantly delayed. Furthermore, linked to AMP7 WINEP outcomes, you have applied to cap your abstraction at Lasham to recent actual rates in May 2025, which has not been planned for. The lack of resilience in WRZ4 is contributing to the need for ongoing unplanned abstraction at Greywell and Itchel. Your AR commentary states that Cookham is provisionally planned to be back in supply by summer 2026. Within WRZ2 three supply sources (Forest Row, Coggins Mills and Weir Wood) have ongoing works to deliver the full Deployable output. Your AR commentary states that a decision on further work to increase the yield as planned for Coggins Mill in AMP8 is under review. Given that this resource zone is in deficit, we would expect further detail to be provided on this and assurances that security of supply is being prioritised. Within WRZ6 your temporary write-down of Aylesford Newsprint source as a result of	Unplanned outage and lack of resilience in WRZ4 puts customer supplies and the environment at risk through unplanned continued abstraction at the Greywell and Itchel sources to meet the supply deficit. There is also concern regarding your ability to deliver supply-side schemes when needed and impacts on security of supply.	Ham WTW, indicating key milestones, as well as mitigating actions should there be further delays. • provide and deliver a detailed updated programme of works for Forest Row, and Weir Wood to deliver their full deployable output, as well as mitigating actions should there be further delays. • provide further detail on the progress with Coggins Mill DO recovery, and also the review as to further work to increase DO to planned values. You should consider the implications of not carrying out this work and what alternative measures would be required given this zone has an uplifted dry-year headroom deficit. • provide further information as to the Aylesford Newsprint DO write-down, and the actions that are planned to recover the DO in line with the WRMP24. • provide us with a programme of work and timeframe in which the supply side schemes listed will be delivered. This should also explain how works will be expediated if the SDB position changes. • provide an update on the progress of supply scheme delivery to Defra/EA/Ofwat in December 2025 and April 26 at the

Issue	Impact	Action and deadline
construction and programme delays has resulted in a significant decrease in DO by 9.35MI/d. Delivery of the Bewl-Darwell scheme forecast to be delivered by March 2025 has been delayed. You indicate within the Annual Review commentary that you expect the Bewl WTW upgrade and network improvements to be completed by 2028. This will improve security of supply for customers in WRZ2 and WRZ3. You have stated that a yield of 22 MI/d will be available from Broad Oak SRO in 2035 We are concerned about any potential delays to Broad Oak delivery dates and the resulting impact on your WRMP.		Joint Regulator meetings and at the Quarterly Director Meetings throughout 2025/26. - Review your RZ2 resilience and actions to improve it. Consider any updates that are needed to your drought plan because of the issues in RZ2 - ensure regulators are updated regularly with progress on all the points above Deadline: 6 weeks after the issued letter date
Distribution Input Your company level reported Distribution Input (DI) of 546.98 MI/d is 7.6% above your WRMP24 forecast of 508.54 MI/d. This has increased by 2.69 MI/d since year and DI in all your water resource zones except WRZ3 are higher than forecast. Above forecast DI has contributed to water resource zones WRZ2 and WRZ8 being in	An over-forecast level of DI represents a risk to the environment and security of supply for your customers High demand for water has contributed to operational challenges and your ability to meet customer demand during warm dry periods. This requires immediate additional action to reduce customer demand.	You should: provide us with an action plan that demonstrates how you plan to bring DI in line with your WRMP24 DI forecast. You should follow the specific action plan section of the water resources management plan annual review guidance when writing your action plan. The action plan should consider the causes of the recent increasing demand trend; the

Issue	Impact	Action and deadline
deficit and has negatively impacted your company-level SDB.		effectiveness of measures already being taken, further actions and timeframes you will take to rapidly reduce customer demand • deliver the action plan according to the timelines you have set out and consider the implications if demand does not reduce. • provide an update on progress with delivery of the action plan and your performance against WRMP24 Per Capita Consumption (PCC) and DI forecasts PCC and DI baseline to Defra/EA/Ofwat in December 2025 and April 2026 at the Joint Regulator meetings and at the Quarterly Director Meetings throughout 2025-26. Deadline: 6 weeks after the issued letter date
Total leakage Your reported total leakage of 104.79 MI/d is 29% above your WRMP24 forecast of 81 MI/d, and 3.39 M/d higher than last year. It is concerning that leakage has increased for the third consecutive year and you have stated that this has impacted your Distribution Input exceeding forecast Leakage in the water resource zone WRZ8 is 9.1MI/d (49%) above forecast, which is	A trend of rising leakage for the third consecutive year and the subsequent impact on your supply-demand balance (SDB) and Distribution Input (DI) is contributing to a potential risk to your customers' security of supply. Achieving your planned leakage reductions is reputationally important, as you are asking customers to reduce their water use.	You should: • provide us with an action plan alongside your 'new leakage strategy' referred to in your annual review that demonstrates how you plan to reduce leakage in line with your WRMP24 leakage forecast. This should consider any outstanding actions from your Service Commitment Plan, as well as any lessons learned. You should follow the specific action plan section of the water resources management plan

Issue	Impact	Action and deadline
contributing to the supply deficit within this zone. We are concerned that the leakage actions within the service commitment plan have not brought leakage in line with your WRMP24 forecast.	The early part of WRMP24 is also reliant on demand management activities including leakage, and therefore there could be implications on the robustness of the plan if forecasted leakage reductions cannot be delivered.	annual review guidance when writing your action plan. • include targeted performance levels for leakage at 6-monthly intervals to profile your recovery to WRMP24 levels. Where actions are carried over from the previous plan, identify the progress made to date. • include the expected benefits, associated timescales and associated activity levels (where appropriate) for each action • in your annual review narrative, you stated you have dedicated additional resources to reducing leakage. You should include in the action plan an explanation of how these resources will be used to bring your leakage back in line with your WRMP24 leakage forecast • deliver the action plan according to the timelines you have set out • provide an update on progress with delivery of the action plan and your performance against WRMP24 total leakage forecast starting position to Defra/EA/Ofwat in December 2025 and April 2026 at the Joint Regulator meetings and at the Quarterly Director Meetings throughout 2025-26. Deadline: 6 weeks after the issued letter date

Issue	Impact	Action and deadline
		ensure the data in future annual review submissions is properly quality assured and free from errors associated with negative leakage values.
Per Capita Consumption (PCC) Your reported average household PCC of 144.3 l/h/d is 2.7% above your WRMP24 forecast of 140.5 l/h/d. Average Household PCC has increased (0.92 l/h/d) in comparison to last year, and you did not meet your PCC forecast during any reporting years in AMP7. Your reported unmeasured household PCC is significantly higher than forecast at 191.9 l/h/d, with Water Resource Zone WRZ2 being the highest zone at 246.9 l/h/d. We are concerned that above forecast PCC is contributing to zonal deficits.	Your high household consumption has directly contributed to water resource zones WRZ2 and WRZ8 being in deficit and has negatively impacted your company-level SDB. It is an ongoing issue that presents a continued risk to your customers' security of supply.	You should: - provide us with an action plan for how you intend to reduce average household PCC and bring average household PCC in line with WRMP24 forecasts. You should follow the specific action plan section of the water resources management plan annual review guidance when writing your action plan. - provide us with an action plan for significantly reducing unmeasured household PCC and bringing unmeasured household PCC in line with WRMP24 forecasts. You should follow the specific action plan section of the water resources management plan annual review guidance when writing your action plan. - include targeted performance levels for PCC at 6-monthly intervals to profile your recovery to WRMP24 levels. - include the expected benefits, associated timescales and associated activity levels (where appropriate) for each action - deliver the action plans according to the timelines you have set out.

Issue	Impact	Action and deadline
		provide an update on progress with delivery of the action plan and your performance against WRMP24 average household PCC forecast starting position to Defra/EA/Ofwat in December 2025 and April 2026 at the Joint Regulator meetings and at the Quarterly Director Meetings throughout 2025-26. Deadline: 6 weeks after the issued letter date
Non-household consumption Your reported total non-household consumption of 94.27 MI/d is 4.3% above your WRMP24 forecast of 90.36 MI/d. While this represents a decrease since last year, all zones except WRZ5 and WRZ6 are above forecast. We are concerned that above forecast non-household consumption is contributing to zonal deficits.	High non-household consumption has directly contributed to water resource zones WRZ2 and WRZ8 being in deficit and has negatively impacted your company-level SDB. It is an ongoing issue that presents a continued risk to your customers' security of supply	You should: - provide us with an action plan for how you intend to reduce non household consumption and bring this in line with WRMP24 forecasts. You should follow the specific action plan section of the water resources management plan annual review guidance when writing your action plan. - deliver the action plan according to the timelines you have set out - provide an update on progress with delivery of the action plan and your performance against WRMP24 non-household forecast starting position to Defra/EA/Ofwat in December 2025 and April 2026 at the Joint Regulator meetings and at the Quarterly Director Meetings throughout 2025-26. Deadline: 6 weeks after the issued letter date



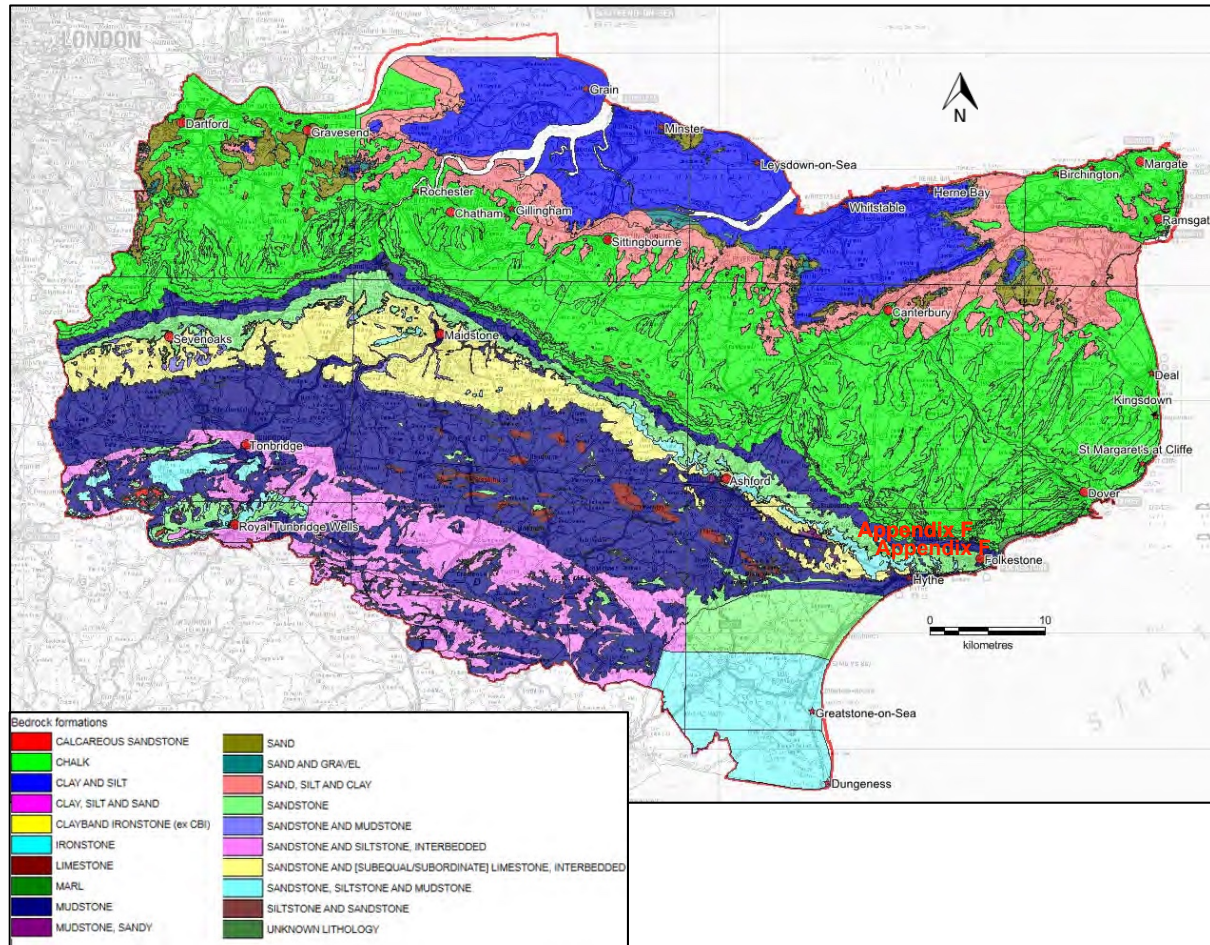
***Vertigo moulinsiana*, Desmoulin's Whorl Snail**

Assessment by: Killeen, I., Moorkens, E. & Seddon, M.



View on www.iucnredlist.org

Figure 3-1. Bedrock geology in Kent



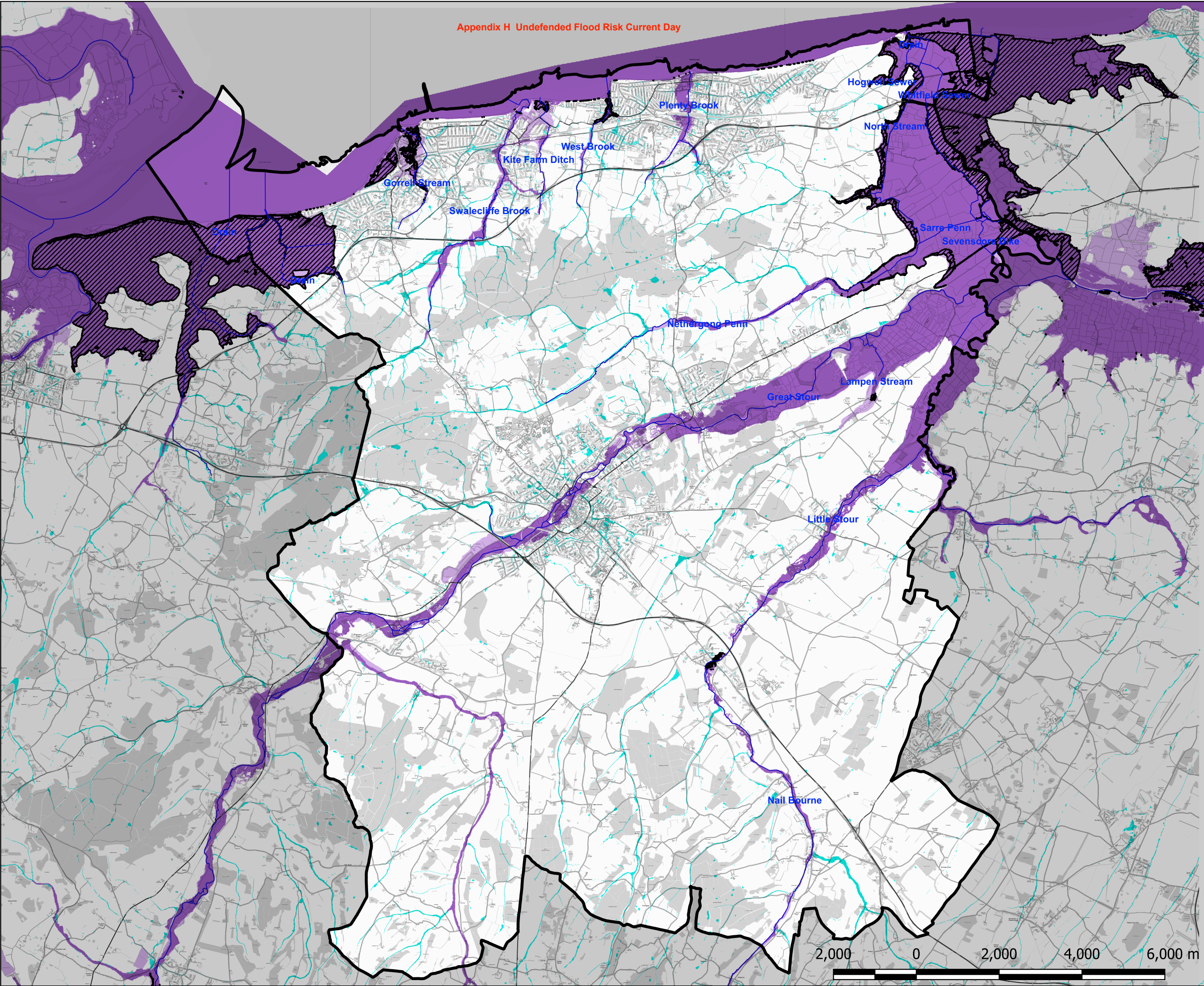
3.1.3 Rivers

The majority of the study area is drained by three main river catchments:

- The most significant is the Medway catchment, draining the southern section of the LPA areas of Sevenoaks, Tonbridge and Malling, the northern and western section of Tunbridge Wells, the western section of Ashford, parts of Swale and the LPA areas of Maidstone, and Medway, eventually discharging to the Thames Estuary. The Medway falls into the Thames WFD River Basin District (RBD) and tributaries draining to the Medway are included within the Medway Management Catchment;
- The Great Stour, which drains most of the LPA areas of Ashford, Canterbury, parts of Dover, Shepway and Thanet to the North Sea on the eastern coast of the County. The Stour falls into the South East RBD and tributaries draining to the Stour are included within the Stour Management Catchment; and,
- The Darent, draining the majority of the LPA areas of Sevenoaks and Dartford to the Tidal Thames. The Darent falls into the Thames RBD.

Smaller catchments drain the LPA area of Swale to the Thames Estuary and North Sea (included in the Thames RBD), and parts of Dover to the English Channel (included within the South East RBD). As well as draining to the Great Stour, Romney Marsh is drained by a complex catchment of land drains to the English Channel as well as parts of the River Rother to the west; these WFD catchments fall into the Stour Management Catchment within the South East RBD.

In total, there are 114 main rivers managed for flood risk purposes by the Environment Agency, as shown in Figure 3-2; this figure also shows the main river catchments, referred to as WFD Management catchments within the RBMP. The watercourses are designated into 84 WFD water bodies (and associated WFD water body catchments) for water resources, water quality and aquatic ecology management and regulatory purposes. Appendix F provides the names for each of the numbered waterbodies shown in Figure 3-2.



TITLE

**POTENTIAL RISK OF FLOODING
CURRENT DAY
(UNDEFENDED)**

LEGEND

Boundary

Canterbury City Council Boundary

Watercourses

Watercourses

Flood Zones

Flood Zone 3

Flood Zone 2

1 in 100 Year (Surface Water)

Areas Benefiting from Flood Defences

NOTES

This drawing contains Ordnance Survey data © Crown copyright and database copyright 2022.

This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of His Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings.

herrington
CONSULTING LIMITED

Unit 6 & 7 Barham Business Park,
Elham Valley Road,
Canterbury,
Kent,
CT6 4DQ

www.herringtonconsulting.co.uk

+44 (0)1227 833855
enquiries@herringtonconsulting.co.uk

canterbury
city council

Civic Centre,
Military Road,
Canterbury,
Kent,
CT1 1YW

www.canterbury.gov.uk

01227 862000

REV	DESCRIPTION	DATE
1	1st issue	07-10-2022

CLIENT

Canterbury City Council

PROJECT

Strategic Flood Risk Assessment

SCALE

1 : 82759 @
A3

PROJECT No.

1396

INITIALS

AB

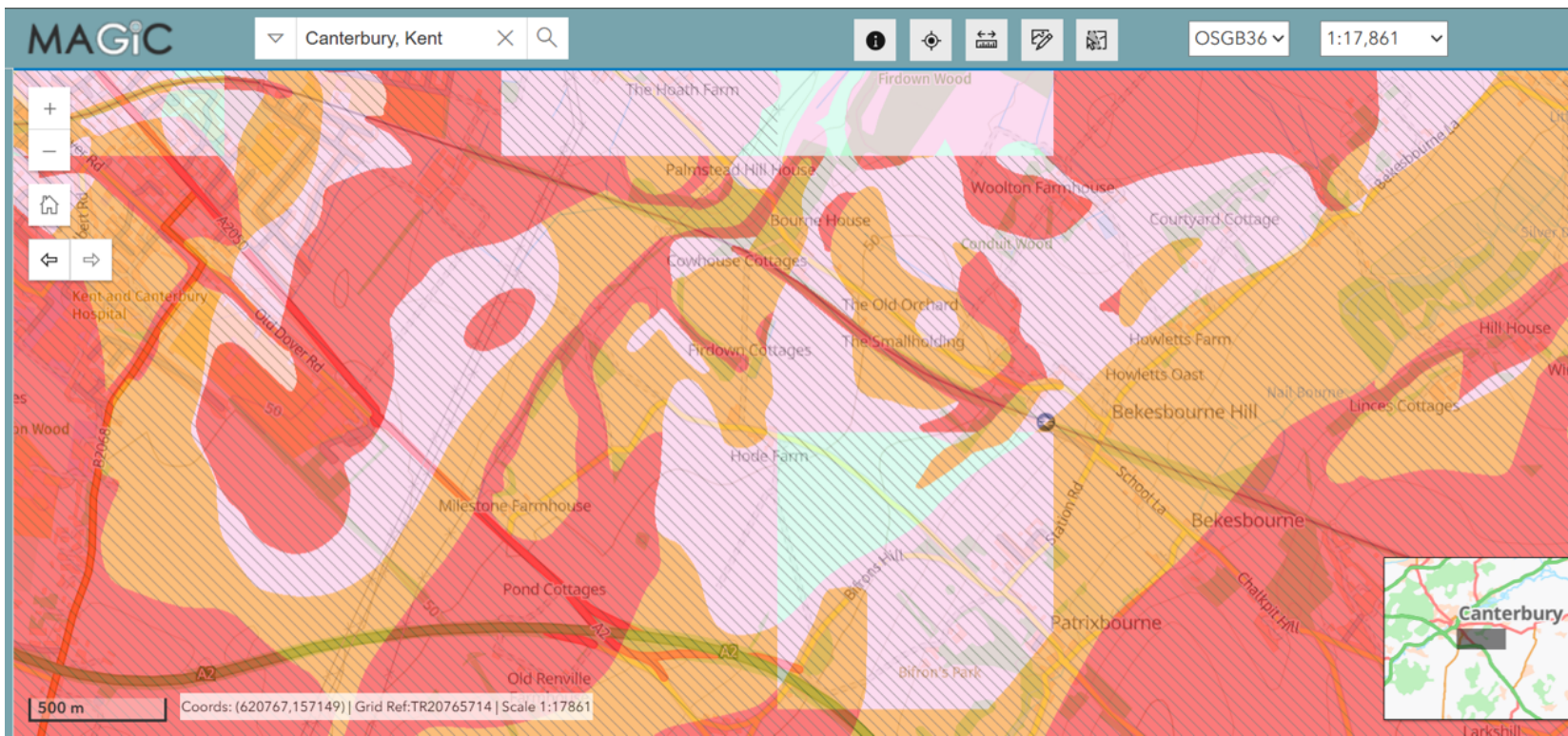
CHECKED BY

AW

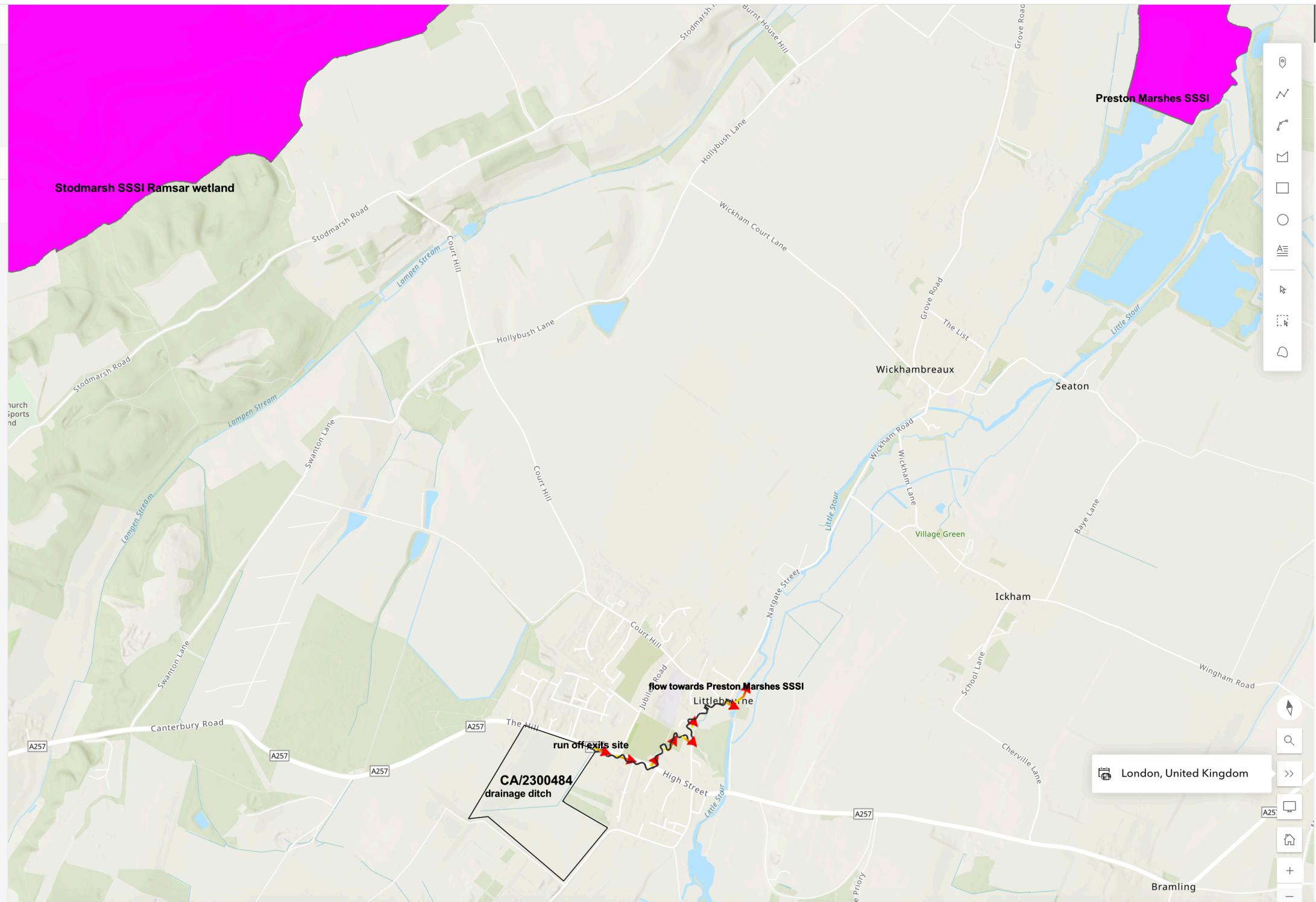
DRAWING No.

Appendix A.4

Appendix I Mountfield site 1 to 17 000 groundwater vulnerability



Appendix J SSSI harm via Little Stour CA/2300484



Date: 09 November 2023
Our ref: 454770
Your ref: CA/23/00484



Canterbury City Council
Military Road
Canterbury
CT1 1YW

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Gambrill,

Planning consultation: Outline planning for up to 300 residential dwellings, new community hub, surface water flood mitigation & attenuation. AMR except for access.

Location: Land at the Hill, Bekesbourne Lane, E of Bekesbourne Hill, Bekesbourne, Canterbury CT4 5EA

Thank you for your consultation on the above dated 12 October 2023 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Stodmarsh Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site as well as Preston Marshes Site of Special Scientific Interest (SSSI). Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- Proposal of additional mitigation measures to negate the remaining nutrients following the implementation of SuDS and upgrades to Newnham WwTW.
- Consideration of impacts to Preston Marshes SSSI as a result of the proposal.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Stodmarsh SAC, SPA and Ramsar

Habitats Regulations Assessment

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that **it is not possible** to ascertain that the proposal will not result in adverse effects on the integrity of the sites in question.

Natural England advises that the assessment does not currently provide enough information or certainty to justify the assessment conclusion and that your authority should not grant planning permission at this stage.

Further assessment and consideration of mitigation options is required, and Natural England provides the following advice on the additional assessment work required;

Additional Information Required

In our previous response dated 23 August 2023 (our ref. 445084) we requested that clarity be provided as to whether interim foul water disposal measures would be required at the proposed development until the proposed wastewater treatment works (WwTW) is operational. We also recommended that the Environmental Agency (EA) be consulted due to the need for a discharge permit.

We note that a response from the EA was received on 8 September 2023 objecting on the grounds that an existing mains connection is possible at the site and that the proposed discharge point, Nail Bourne tributary, is a seasonally dry watercourse and therefore not suitable for discharge. A further response was received from the EA on 18 October 2023 maintaining their objection. With a discharge permit from the EA unlikely to be granted, the proposed WwTW is not sufficiently certain to be considered as mitigation at appropriate assessment.

It is noted that an updated Nutrient Neutrality Assessment and Mitigation Strategy (ref. 21045-NUT-RP-01/C01) has been submitted by the applicant, which appears to acknowledge that the onsite WwTW may not be possible and proposes alternative measures of mitigation. The document provides nutrient calculations undertaken in line with Natural England's Generic Methodology (March 2022), however the accompanying Nutrient Budget Calculator has not been used. This has led to a small disparity in nutrient loads, with the recommended calculator showing a post-2025 budget of 39.41kg TP/year and 808.92kg TN/year. We therefore recommend that the applicant uses the Nutrient Budget Calculator for robustness.

In the absence of the onsite WwTW, the applicant has proposed the disposal of foul water to Newnham WwTW and the installation of SuDS to mitigate the surface water nutrient load, reducing this from 135.56kg N/year and 12.62kg P/year to 88.79kg N/year and 2.06kg P/year. Following upgrades to Newnham WwTW in 2025 the total nutrient budget for the development would be 65.60kg N/year and 0.58kg P/year, however no mitigation has been proposed to negate this. Therefore further information is required to enable a conclusion of no adverse effect on the integrity of the Stodmarsh designated sites.

Preston Marshes SSSI

Despite our previous recommendation that the applicant consider impacts to Preston Marshes SSSI, due to the hydrological connection between the development site and the SSSI via the Little Stour, no consideration has been made nor mitigation proposed. It is our advice that this information be provided to ensure the development does not damage or destroy the SSSI.

Final Comments

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

If you have any queries relating to the advice in this letter please contact me on Sophie.Moore@naturalengland.org.uk.

Please consult us again once the information requested above, has been provided.

Yours faithfully

Sophie Moore
Lead Advisor for Casework

Annex A – Additional Advice

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on [Gov.uk](#) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found on [Gov.uk](#). Natural England does not routinely hold species data, such data should be collected when impacts on

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Annex A – Additional Advice

priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 4.0](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 4.0](#) and is designed for use where certain criteria are met.

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 4.0](#) and is available as a beta test version.

Green Infrastructure

Natural England's [Green Infrastructure Framework](#) provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the [15 Green Infrastructure Principles](#). The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

GI mapping resources are available [here](#) and [here](#). These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Annex A – Additional Advice

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

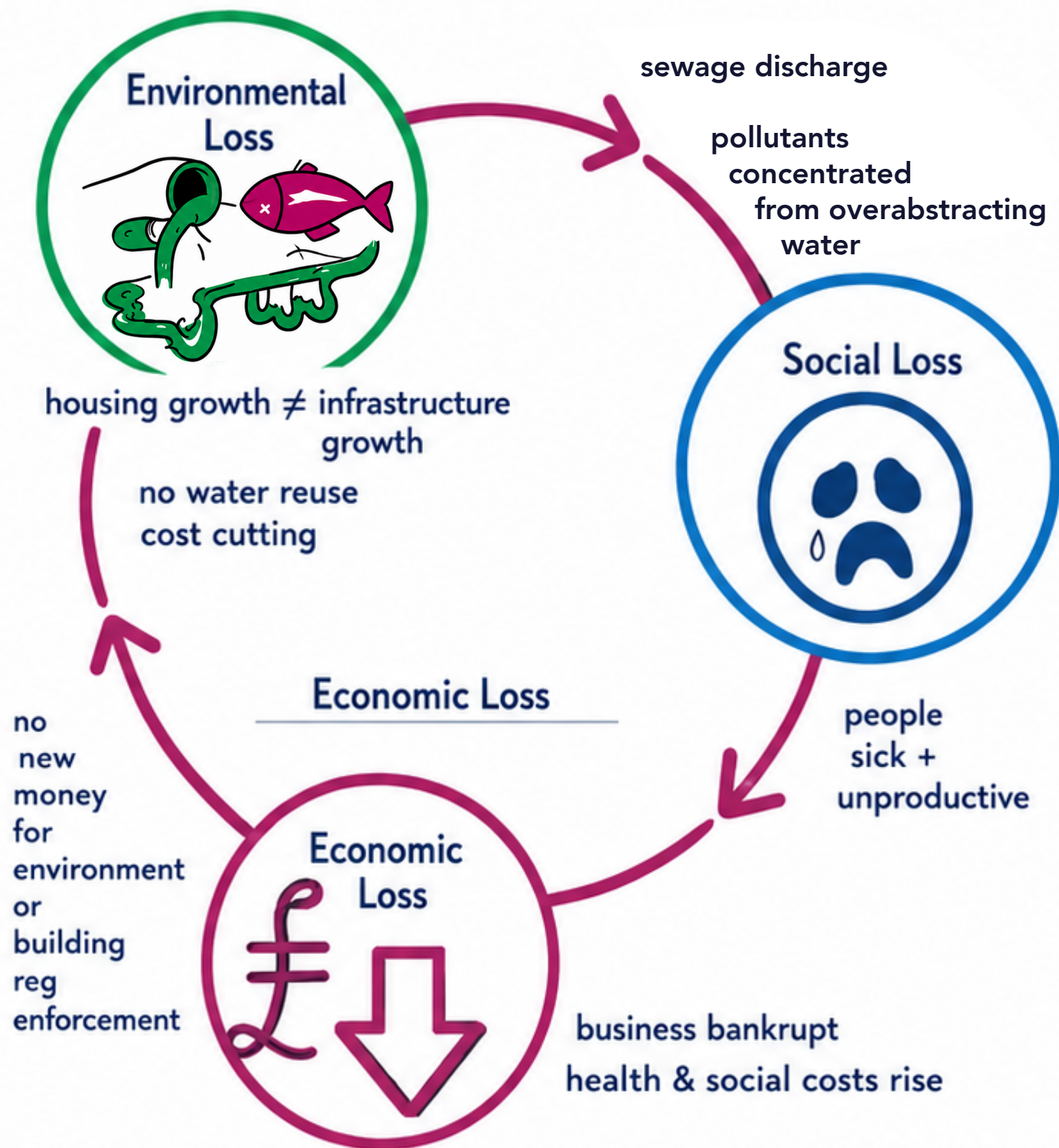
Table 5-7 - Summary SA of proposed housing allocations – Canterbury area

SLAA Site Ref:	Site Address:	Proposed allocation policy reference	SAO 1: Air Quality	SAO 3: Biodiversity	SAO 4: Geology	SAO 5: Landscape	SAO 6: Water	SAO 7: Flood risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA151	Land at Merton Park	N1	-	--	--	--	--	--	--/?	+/+/-	+/+/-	+/+/?	+/+/-	+/+/-
SLAA128	Land at Langton Lane	N2	0	--	0	-	-	++	0	+	--/?	+	+/+/-	+/+/-
SLAA122	Land south of Littlebourne Road	N4	0	--	--	--	--	--	--/?	++	--	++	+/+/-	++
SLAA302	Land south of Bokesbourne Lane	N5	0	--	--	Text - text	--	--	--	++	--	++	+/+/-	+/+/-
SLAA266	Land north of Bokesbourne Lane at Hoath Farm	N6	0	-	0	--	--	++	--	+	--	++	+/+/-	+
SLAA346	Land at Seotamot	N7	0	--	--	-	0	++	-	+	+/+/-	+	+/+/-	+
SLAA360	Millers Field Car Park	N8	-	--	--	+	--	--	--	+	+	++	++	++
SLAA373	Land at Hawk's Lane	N9	-	-	0	+	-	++	--	+	+	++	++	++

Canterbury District Local Plan 2017 – 2026

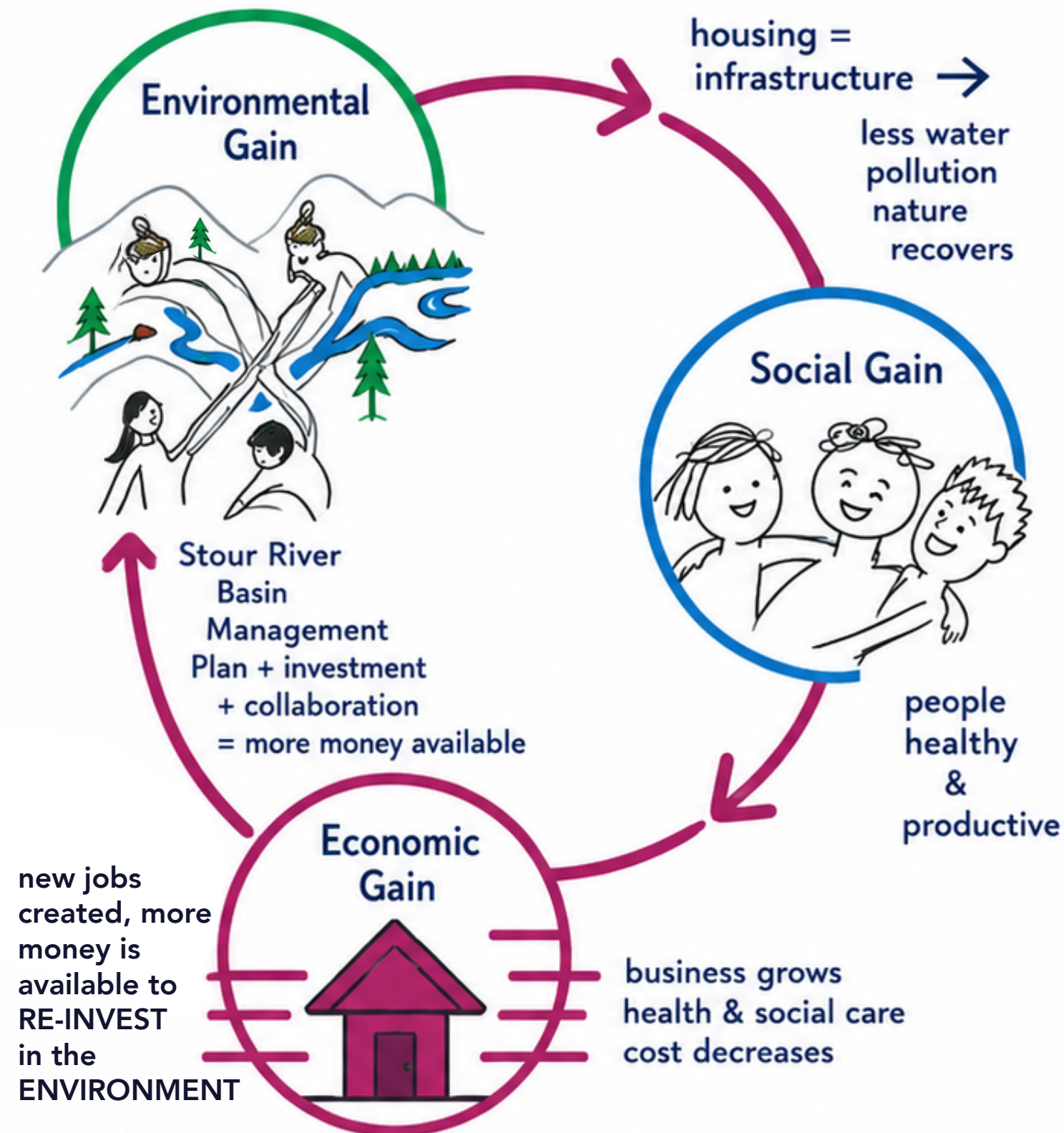
Appendix L Graphic
contrasting sustainable
and unsustainable
feedback loop

UNSUSTAINABLE DEVELOPMENT



Canterbury District Local Plan 2026 – 2033

SUSTAINABLE DEVELOPMENT



**SUSTAINABLE ECONOMIC GROWTH IS NOT POSSIBLE WHEN YOU HARM
THE ENVIRONMENT AND SOCIAL WELL-BEING**



**15th meeting of the Conference of the Contracting Parties
to the Convention on Wetlands**

**“Protecting wetlands for our common future”
Victoria Falls, Zimbabwe, 23-31 July 2025**

Resolution XV.26

Water, water-related and water-management-related matters

1. RECALLING Resolution VI.23 on *Ramsar and water*, Resolution VII.18 on *Guidelines for integrating wetland conservation and wise use into river basin management*, Resolution VIII.1 on *Guidelines for the allocation and management of water for maintaining the ecological functions of wetlands*, Resolution VIII.40 on *Guidelines for rendering the use of groundwater compatible with the conservation of wetlands*, Resolution IX.3 on *Engagement of the Ramsar Convention on Wetlands in ongoing multilateral processes dealing with water*, Resolution X.19 on *Wetlands and river basin management: consolidated scientific and technical guidance*, and Resolution XII.12 on *Call to action to ensure and protect the water requirements of wetlands for the present and the future*, adopted at the 6th, 7th, 8th, 10th and 12th meetings of the Conference of the Contracting Parties;
2. REALIZING that a number of related decisions have been adopted previously which provide guidance for the Contracting Parties on wetland policy formulation (Resolution VII.6), reviewing laws and institutions (Resolution VII.7), involving local communities and indigenous people in wetland management (Resolution VII.8), promoting communication, education and public awareness related to wetlands (Resolution VII.9), incentives (Resolution VII.15), impact assessment (Resolution VII.16), wetland restoration as part of national planning (Resolution VII.17), and international cooperation under the Ramsar Convention (Resolution VII.19), all of which are relevant to the process of the allocation and management of water for maintaining the ecological functions of wetlands;
3. REALIZING ALSO that, at its eighth meeting, the Conference of the Contracting Parties adopted further guidance that is relevant to the allocation and management of water for maintaining the ecological functions of wetlands, notably the *New Guidelines for management planning for Ramsar sites and other wetlands* (Resolution VIII.14), *Principles and guidelines for wetland restoration* (Resolution VIII.16), impact assessment (Resolution VIII.9), *Agriculture, wetlands and water resource management* (Resolution VIII.34), *The impact of natural disasters, particularly drought, on wetland ecosystems* (Resolution VIII.35), and *Guidelines for rendering the use of groundwater compatible with the conservation of wetlands* (Resolution VIII.40);
4. RECOGNIZING the important hydrological functions of wetlands, including groundwater recharge, water quality improvement and flood alleviation, and the inextricable link between water resources and wetlands;

5. FURTHER RECOGNIZING the paucity of hydrological data which exists for the determination and quantification of the hydrological functions of wetlands;
6. REALIZING the need for planning at the river basin scale, which involves integration of water resource management and wetland conservation;
7. AWARE of the Preamble to the Articles of the Convention, which recognizes the fundamental ecological functions of wetlands as regulators of water regimes and as habitats supporting a characteristic flora and fauna, especially waterfowl;
8. NOTING Decision IV/4 of the Convention on Biological Diversity (CBD), which identified the Ramsar Convention as its lead partner for actions concerning the conservation and wise use of wetlands, and particularly inland water ecosystems, including actions concerning the allocation and management of water for the maintenance of inland waters biodiversity;
9. AWARE of the Report of the World Commission on Dams, which includes information on the evaluation and assessment of water allocations, and specifically on environmental flow releases from dams, in the decision-making process for large dams, and of Resolution VIII.2 on the same subject adopted at the eighth meeting of the Conference of the Parties (Valencia, 2002);
10. RECOGNIZING the vital contribution made by wetlands on many occasions to ensure the allocation of water required for human well-being, including food and water security, and in flood control and poverty alleviation; but ALSO AWARE of the increasing demands being placed upon freshwater resources in many parts of the world and the threat this poses for maintaining wetland ecosystem functions and their biodiversity;
11. FURTHER AWARE of the importance placed on freshwater resources in the United Nations Special Session of the General Assembly to review and appraise the implementation of Agenda 21, and in the subsequent Commission on Sustainable Development meeting in May 1998, which as part of its report relating to Strategic Approaches to Fresh Water Management recommended support for the implementation, inter alia, of the Ramsar Convention;
12. RECOGNIZING the importance of the whole water cycle and the link existing between ground and surface water for their use and management, not only in arid and semi-arid regions but also in humid regions;
13. TAKING INTO ACCOUNT the urgent need to decrease the loss and degradation of aquatic ecosystems through policies of sustainable development and conservation of biodiversity;
14. ALSO TAKING INTO ACCOUNT that maintenance of the ecological integrity of most wetlands, especially those located in arid and semi-arid zones, is closely linked to the supply of groundwater;
15. AWARE of the importance that the use of groundwater has had for the economic development and improvement of welfare in many regions (mainly because of irrigated agriculture);
16. EQUALLY AWARE of the negative impact that can be caused to wetlands because of uncontrolled development and lack of planning for groundwater;