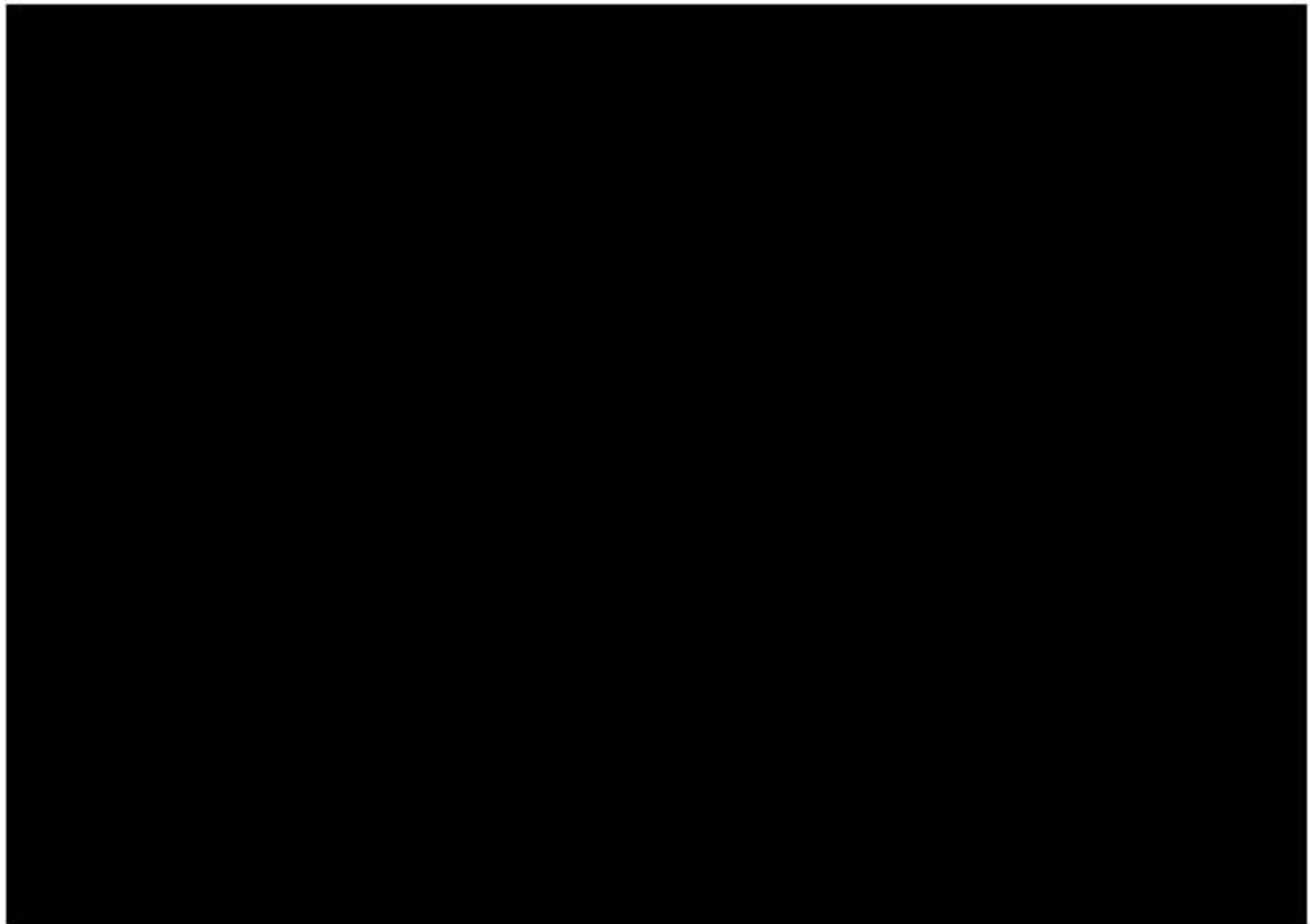




Planning application DM/26/0682

Dear Mr. King

I wish to comment further regarding the well-documented copious travails associated with South East Water and their apparent lack of investment in infrastructure from the reservoir to the kitchen sink tap. Like thousands of others, you will have received their latest pleading emails, which emphasise the parlous state of their storage capacity and their ability to adequately maintain supply during periods of warmer weather, which they, together with numerous academics, attribute to climate change, as referenced in their Water Resources Management Plan 2024, Household consumption forecast, Chapter 4.

Water Resource Management Plans attempt to model household and non-household water consumption for future years using known input data sourced from within South East Water and from external stakeholders in order to ascertain the degree of headroom needed until the end of the plan period in 2028 and beyond.

Responses from customers have been summarised as follows:

*“Population growth is an issue highlighted by our customers. It is something they see as a challenge that will only grow with time and an issue that companies need a long-term plan to manage demand. Customers recognise there are a number of challenges that need to be addressed, and these challenges are interlinked. When talking about population and demand, customers felt it was an important challenge to tackle because there is an understanding that the population is rising in local areas. Different strategies are needed to control usage vs flooding/capture. We found that generally customers do understand a lot about the threat of over-development in this area and population growth affecting the aquifers and groundwater levels etc.”*

Previously, South East Water has emphasised that there are many uncertainties, including population growth based upon 2011 Census data supplied by local authorities, which resulted in an underestimation in 2014, due to the effects of climate change as outlined elsewhere, and from directives issued by Natural England.

Assuming that housing targets are directed to local authorities by the central government, it is incumbent upon local authorities to update the previous data submitted to water companies in a timely manner. Unfortunately, some local authorities have not done so, as illustrated earlier in 2026 when Tonbridge and Malling Borough Council received a response to Regulation 18 from South East Water. *“As a statutory consultee, South East Water submitted a six-page response referencing its Water Resources Management Plan 2024. The response highlighted a significant difference between the Government’s housing targets for Tonbridge and Malling and the housing figures used in South East Water’s infrastructure planning, stating that current and planned supply cannot support the scale of development proposed.”* That’s a pretty damning indictment of the planning system and those involved with it.

*At a public meeting held on 8 April 2026, Cllr Matt Boughton (Leader of Tonbridge and Malling Borough Council) discussed South East Water’s response to the Council’s Regulation 18 Local Plan consultation. As a statutory consultee, South East Water submitted a six-page response, referencing its Water Resources Management Plan 2024. The response highlighted a significant difference between the Government’s housing targets for Tonbridge and Malling and the housing figures used in South East Water’s infrastructure planning, stating that current and planned supply cannot support the scale of development proposed. The Council has formally raised these concerns with South East Water and the Government. A letter was sent to South East Water’s chief executive, setting out concerns and seeking clarity on supply capacity, infrastructure improvements, and whether the issues would be communicated to the Government. South East Water confirmed it cannot meet the housing targets with existing capacity and outlined planned infrastructure upgrades, noting that major improvements are not expected before 2032. The Council has also written to the Minister for Housing and Planning to make the Government aware that the statutory water provider has stated it cannot supply water for the imposed housing targets. Reference was made to a recent parliamentary debate on the issue and ongoing lobbying through MPs. At the time of the meeting, no direct written response from Government had been received.*

*The Council is reviewing existing permissions that have not yet been built out to understand their impact on remaining supply. It was confirmed that each application will be assessed individually, with differences noted between brownfield sites with existing connections and greenfield sites requiring new infrastructure.*

As a consequence of the above happenings in a neighbouring water zone, can you kindly expedite (not necessarily yourself) the publication of all correspondence between Mid Sussex DC and South East Water, who clearly are a statutory consultee, regarding revised Government housing targets, dated 30.07.2024, with a view to confirming that a similar event will not occur due to the proposed housing quota exceeding the demand headroom for our water zone WZ3 prior to completion of committed development ahead of major infrastructure improvements scheduled by 2032.

In response to the District Plan (2020) South East Water replied as follows:

*“South East Water will work with local authorities and developers to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring that the surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators. South East Water would like to be kept updated with any developments relating to the Mid Sussex District Council Local Plan and we welcome the collaboration with the Council. We look forward to working with Mid Sussex District Council to ensure that drinking water supplies remain protected in the area in the future.”* Caveats aplenty in what seems to be a standard reply with a vague assurance on future demand supply, which is primarily dependent upon rainfall.

Historically, responses from a struggling South East Water to Mid Sussex planning applications have been absent from Reports to the Planning Committee but managed inclusion into regulation 18.

The prospect of the Northern Arc development, which hitherto has experienced delayed occupancy attributed to utility problems, not being guaranteed a water supply upon completion does not bear thinking about, leaving Mid Sussex DC with a remorseless egg on face moment to endure.

