

17th December 2025



Our Reference: SEW Response_TMBCLP_17/12/25
Your Reference: Tonbridge & Malling Local Plan

Email: planning@southeastwater.co.uk

Tonbridge and Malling Borough Council
Gibson Building
Gibson Drive
Kings Hill
West Malling
ME19 4LZ

localplan@tmbc.gov.uk

Dear Sir/Madam,

Proposal: Tonbridge and Malling Local Plan Consultation

South East Water would like to thank Tonbridge and Malling Borough Council for bringing the Tonbridge and Malling Local Plan consultation to our attention.

Water Resources Planning

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

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

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

Growth Forecasting

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

From our review of the latest housing forecast figures, which have been increased to meet government targets and provided to us by local authorities within our supply area, we have identified that we cannot accommodate additional growth beyond what was assumed in our Water Resources Management Plan 2024 (WRMP24) in areas where we do not have a supply-demand surplus.

Specifically, in the Tonbridge and Malling area, where we currently lack available headroom in our supplies, we would be unable to accommodate any growth exceeding our WRMP24 forecast assumptions throughout the entire planning period. This is because our WRMP24 was developed to balance supply and demand based solely on the growth forecasted and provided to us in recent years.

We have completed an assessment to compare your latest growth forecast figures (using your IDP datasets) against the forecast we used in our published WRMP24, please see the comparison below:

Source	Local Planning	2025	2026	2027	2028	2029	2030	2031	2032	2033
WRMP24	Tonbridge and Malling	901	554	382	399	330	295	272	252	252
LPA IDP	Tonbridge and Malling	1090	1090	1090	1090	1090	1090	1090	1090	1090
<i>Percentage difference Tonbridge and Malling</i>		<i>20.98%</i>	<i>96.75%</i>	<i>185.34%</i>	<i>173.18%</i>	<i>230.30%</i>	<i>269.49%</i>	<i>300.74%</i>	<i>332.54%</i>	<i>332.54%</i>

Source	Local Planning	2034	2035	2036	2037	2038	2039	2040	2041	2042	Total
WRMP24	Tonbridge and Malling	252	252	322	298	298	298	298	320	343	6,318
LPA IDP	Tonbridge and Malling	1090	1090	1090	1090	1090	1090	1090	1090	1090	19,620
<i>Percentage difference Tonbridge and Malling</i>		<i>332.54%</i>	<i>332.54%</i>	<i>238.51%</i>	<i>265.77%</i>	<i>265.77%</i>	<i>265.77%</i>	<i>265.77%</i>	<i>240.15%</i>	<i>217.88%</i>	210.52%

We would like to highlight that the housing numbers proposed in your latest IDP in the period 2025-42 are considerably higher than we have in our WRMP24 forecast. Due to the current supply-demand situation in our WRZ1 (Tonbridge Wells), WRZ6 (Maidstone) and WRZ7 (Cranbrook) water resource zones, this increase causes significant stress to our supply system. To assess the impact beyond our current WRMP24 forecast, we would need to recalculate our demand forecast and rerun our decision-making process. This would help us identify additional interventions, such as new supplies, transfers, or increased demand reduction programs, which would not be known until we complete the work for our next plan, WRMP29.

For your information, the Environment Agency's current timetable for publishing our Resource Position Statement is May 2027, with our draft WRMP29 scheduled for March 2028. Based on these dates, it is likely that we will have developed our new baseline demand forecast (including the most up to date housing projections) by Spring 2027 and identified our proposed interventions to address any deficits a year later in Spring 2028.

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Population Density & Growth

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

New Water Supplies and Infrastructure Development

As part of future development within the South East Water's supply area, more specifically, within our WRZ1 (Tonbridge Wells), WRZ6 (Maidstone) and WRZ7 (Cranbrook) areas there are several planned schemes included within our most recent Business Plan to improve our resilience, water quality and the environment levels within the area such as

- the completion of the Butler water treatment works,
- further work on pipelines to transfer water between the north Kent area,
- increase in water storage at the Halling reservoir site,
- new pumping station to transfer flows to Halling and surrounding areas,
- the upgrade of Tonbridge water treatment works to increase resilience levels
- the upgrade of Pembury water treatment works.

There are several schemes within the area where we will be implementing solutions to enhance our interconnectivity within the area as well as making sure that our water quality levels are maintained at the highest possible level to address current challenges relating to increasing levels of nitrate or turbidity. We are aiming to deliver new pipelines to improve network connectivity between:

- Kemsing and Row Dow reservoirs
- Riverhill and Kilnwood reservoirs
- a new pipeline from Tonbridge WTTW to Bloodshot reservoir to facilitate the upgrade of Tonbridge water treatment works.

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

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

Demand Management

Our aim of reducing household consumption to reach our per capita consumption ambition of 110 litres per person per day by 2050 requires the use of new approaches and technology, including smart metering. The savings are stretching and will be challenging to deliver

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especially given the impacts that affluence, temperature and rainfall have on our regional water use.

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

We do not feel that the current draft local plan is suitably ambitious to adequately address water scarcity in the South East, and would like reference to an industry report published last year, which aims to inform the Government's roadmap for water-efficient new homes. This report sets out a roadmap to target lower per capita consumption (PCC) for new housing in water-stressed areas like ours, aiming for 100 litres per person per day by 2025, 90 litres by 2030, and 80 litres by 2035. We fully support this ambition and encourage local authorities to adopt these targets within your strategies where possible. You can view the report here: [Water Ready A report to inform HM Government's roadmap for water efficient new homes](#) South East Water strongly supports any commitment to sustainable design of new residential and commercial development. South East Water recommends the need for mandatory housing standards for water use which would support water efficiency in new buildings and promote collaboration between councils and developers. Sustainable design standards for all residential and non-residential developments, including water use standards, should be a focus for developers as well as a monitoring responsibility for councils.

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

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

Source Protection

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

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

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

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

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

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

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

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

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

Additional information relating to SPZ's is provided at the end of this letter.

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

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

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

Yours sincerely,

The Planning Team

South East Water

Information on SPZs can be found here:

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

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