

Rother District Local Plan 2025 – 2042

# **Water Background Paper**

Regulation 19 Version – October 2026

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## Contents

|          |                                                       |           |
|----------|-------------------------------------------------------|-----------|
| <b>1</b> | <b>Introduction.....</b>                              | <b>3</b>  |
| <b>2</b> | <b>National and Regional Frameworks.....</b>          | <b>4</b>  |
|          | National Framework.....                               | 4         |
|          | Regional Framework.....                               | 4         |
| <b>3</b> | <b>Key Water Issues and Supporting Evidence .....</b> | <b>6</b>  |
|          | Water availability .....                              | 6         |
|          | Wastewater Infrastructure and Water Quality .....     | 7         |
|          | Flood Risk.....                                       | 7         |
|          | Sustainability Appraisal.....                         | 9         |
| <b>4</b> | <b>Consultation .....</b>                             | <b>10</b> |
| <b>5</b> | <b>Overall Approach and Conclusion .....</b>          | <b>12</b> |

## 1 Introduction

- 1.1 This Topic Paper explains the approach taken by Rother District Council in addressing water-related matters through the emerging Rother Local Plan 2025-2042. It draws together the principal evidence base, identifies the key water issues affecting the district, explains how those issues have influenced policy development and demonstrates why the proposed policy approach is justified, positively prepared and consistent with national policy.
- 1.2 The district is affected by a range of interconnected water-related challenges including water availability, wastewater infrastructure capacity, flood risk, water quality and the protection of internationally important habitats and ecosystems. These issues are expected to become increasingly important over the plan period as a result of climate change, population growth and environmental obligations.
- 1.3 Rother contains an extensive network of rivers, streams, floodplains, wetlands and coastal environments that perform important functions in water storage, flood attenuation, water quality improvement and biodiversity support.
- 1.4 The management of water requires a coordinated approach that considers the availability of water resources, the capacity of wastewater infrastructure, the health of river catchments and the resilience of communities and ecosystems to climate change. The Local Plan seeks to address these matters through an integrated framework of policies relating to water efficiency, flood risk management, drainage, water quality, coastal change and green and blue infrastructure.

## 2 National and Regional Frameworks

### National Framework

- 2.1 The management of water resources, wastewater infrastructure and flood risk is informed by a broad national policy and legislative framework.
- 2.2 The National Planning Policy Framework (NPPF) requires Local Plans to take a proactive approach to mitigating and adapting to climate change, direct development away from areas at highest risk of flooding, reduce vulnerability to flooding and ensure that development is supported by appropriate infrastructure. The NPPF also seeks to protect and enhance the natural environment, improve water quality and support the sustainable use of natural resources.
- 2.3 The wider national framework is established through legislation and guidance including:
- The Environment Act 2021
  - National Planning Policy Framework
  - National Planning Practice Guidance
  - The Flood and Water Management Act 2010
  - The Water Environment (Water Framework Directive) Regulations 2017
  - National Standards for Sustainable Drainage Systems
- 2.4 This framework promotes an integrated approach to water management which recognises the relationship between water resources, flood risk, wastewater infrastructure, water quality, biodiversity and climate resilience. The framework also recognises the important role that river corridors, floodplains, wetlands and sustainable drainage systems can play in supporting these objectives.

### Regional Framework

- 2.5 At a regional level, water management objectives are reflected through a number of environmental and water resource strategies.
- 2.6 Water Resource Management Plans and regional water resource planning identify increasing pressure on water supplies across the South-East arising from population

growth, environmental constraints and climate change. These studies support the need for greater water efficiency and demand management measures within new development.

- 2.7 The South East River Basin District Flood Risk Management Plan (2022) sets out the considerations that should inform future development and plan-making within the river basin, including sustainable drainage, green and blue infrastructure, wastewater treatment, water efficiency, infrastructure provision, the spatial distribution of development, and measures to reduce nutrient pollution from diffuse sources. It further identifies water management issues in the south-east region and sets legally binding environmental objectives aiming to improve water quality. Locally, the two relevant management catchments are the Cuckmere and Pevensy Levels, and the Rother.
- 2.8 The East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026) identifies rivers, streams, wetlands and floodplains as priority assets for nature recovery and environmental enhancement. The strategy promotes restoration of natural hydrological processes, improvements to water quality, wetland creation and greater ecological connectivity throughout river catchments.
- 2.9 The High Weald AONB Management Plan (2024) and the East Sussex Environment Strategy 2020 similarly emphasise the importance of natural flood management, climate resilience, water quality improvements and the protection of river catchments and wider blue infrastructure networks.
- 2.10 The South Marine Plan (2018) establishes a framework for sustainable development and environmental protection within the marine area from Folkestone to the River Dart. The plan objectives seek to ensure protection for habitats and species at risk, climate change adaptation and advocates for the provision of water and wastewater infrastructure necessary to support coastal communities.

### 3 Key Water Issues and Supporting Evidence

#### Water availability

- 3.1 Like all parts of South East England, Rother lies within an area classified by the Environment Agency as seriously water stressed. Future pressures on water resources are expected to increase in line with population growth, an increased demand for water, and the effects of climate change including changing rainfall patterns. Water companies operating within the district have identified the need for significant demand management measures to ensure that future water supplies remain resilient and environmentally sustainable.
- 3.2 Water availability is also closely linked to the condition and management of the district's wider blue infrastructure network. The district's rivers, wetlands, floodplains and groundwater systems have an important role in regulating water movement and storage throughout the catchment. The Rother Green and Blue Infrastructure (Rother GBI) Study (2026) identifies a need to protect and enhance these systems in order to strengthen water resource resilience and improve the ability of natural systems to respond to future climate change pressures. The Rother District Council Local Plan Habitats Regulations Assessment (Rother HRA) (2026) confirms that maintaining a steady water supply is of critical importance for many hydrologically dependent protected habitats sites such as the Pevensey Levels SAC and the Dungeness, Romney Marsh and Rye Bay SPA / Ramsar. For example, in many wetlands, winter flooding is essential for sustaining a variety of foraging habitats. Excess or too little water supply might cause the water level to be outside of the required range for birds, invertebrate or plant species.
- 3.3 Water Resource Management Plans prepared by Southern Water and South-East Water identify increasing pressure on water resources across the south-east arising from population growth, climate change and environmental requirements. These plans support the need for greater water efficiency and demand management measures within new development.

- 3.4 Water efficiency and sustainable water resource management are necessary to ensure that future growth does not place unacceptable pressure on water resources within a seriously water stressed area.

### **Wastewater Infrastructure and Water Quality**

- 3.5 The district contains sensitive river, wetland and coastal environments that are affected by the quality of treated wastewater and surface water entering water bodies. Southern Water's Drainage and Wastewater Management Plans for the Rother River Basin Catchment, and Cuckmere and Pevensey Levels, identify ongoing pressures relating to wastewater treatment capacity, storm overflows, nutrient management and environmental compliance.
- 3.6 The Rother HRA (2026) identifies wastewater discharge and water quality as key pathways through which development has the potential to affect internationally designated habitats.
- 3.7 The Rother GBI Study (2026) identifies the ecological condition of the district's principal river systems as a concern. The River Brede is classified as having poor ecological status, whilst the River Rother and River Tillingham are classified as having moderate ecological status. Nutrient pollution, agricultural runoff, wastewater discharges and historical river modifications are identified as key factors affecting water quality and ecological health.
- 3.8 These issues are particularly important as the district influences several internationally designated habitats, including the Pevensey Levels SAC and Ramsar and the Dungeness, Romney Marsh and Rye Bay SPA and Ramsar. The protection of these sites requires development to be supported by appropriate wastewater infrastructure and robust water quality safeguards.

### **Flood Risk**

- 3.9 Flood risk represents one of the most significant environmental constraints affecting the district. The Rother District Level 1 Strategic Flood Risk Assessment (Rother SFRA) (2026) identifies flood risk from rivers, sea, surface water, groundwater, sewers and reservoirs. Historic flooding events have affected communities within

the district, and climate change is expected to increase future risks through rising sea levels and more intense rainfall events.

- 3.10 The Rother SFRA (2026) recommends a range of measures including flood risk avoidance, sustainable drainage systems, climate change allowances and natural flood management. It also highlights the importance of maintaining floodplain function and protecting watercourses. The Rother District Flood Risk Sequential and Exception Tests (2026) illustrates the approach taken to proposed site allocations within the emerging Local Plan, to ensure that inappropriate development in areas at risk of flooding is avoided by directing development away from areas at highest risk (whether existing or future), and, where development is necessary in such areas, that it can be made safe for its lifetime without increasing flood risk elsewhere, in line with the NPPF.
- 3.11 The district's blue infrastructure network has an important role in managing flood risk. The Rother GBI Study (2026) identifies extensive floodplains associated with the River Rother, River Brede and River Tillingham, together with coastal wetlands, grazing marshes and river corridors that perform flood attenuation functions. These natural systems help store water, slow runoff and reduce downstream flood risk.
- 3.12 The Rother GBI Study (2026) also highlights opportunities for natural flood management, floodplain restoration, wetland creation, river restoration and sustainable drainage systems to contribute towards future flood resilience. These measures provide opportunities to manage flood risk and improve water quality, biodiversity and climate resilience.

## Sustainability Appraisal

- 3.13 The water environment, and water management, features in several objectives of the Sustainability Framework for the Local Plan. This includes the following objectives: SA4 (Minimise water consumption), SA5 (Manage and reduce the risk of flooding (fluvial, tidal and surface water, now and in the future, and increase resilience to the wider effects of climate change), SA6 (The risk of coastal erosion is managed and reduced, now and in the future), and SA14 (The risk of pollution to water is reduced and water quality is improved.). The emerging policy proposals have therefore been considered throughout Sustainability Appraisal (SA) process. The SA has recommended mitigation measures to avoid or reduce predicted likely adverse impacts on the water environment or water management objectives, and these have been incorporated into the Pre-Submission Local Plan.

## 4 Consultation

- 4.1 The Council has undertaken engagement throughout the preparation of the Local Plan.
- 4.2 Early engagement was undertaken with specific consultation bodies and key stakeholders between August and October 2020, followed by subsequent Regulation 18 consultations between April 2024 and June 2024, and January 2026 and March 2026, including continued engagement during preparation of the Regulation 19 Plan. The purpose of this engagement was to identify the key issues affecting the district and to inform policy development.
- 4.3 Consultation responses, including those received from members of the public, consistently identified the following water related concerns:
- Water supply and long-term availability;
  - Wastewater treatment infrastructure capacity;
  - Existing flooding issues and future flood risk;
  - Water quality and related environmental impacts, especially in relation to internationally designated habitats;
  - Climate change resilience;
  - Management of river catchments.
- 4.4 Comments have been received during the formal Local Plan consultation periods from a range of organisations including the Environment Agency, Natural England, East Sussex County Council, Southern Water, South East Water, other infrastructure providers, local communities and other stakeholders. These responses reinforced the importance of appropriately managing flood risk and protecting environmentally sensitive habitats and water environments, ensuring that future growth is aligned with water infrastructure capacity. Meetings have been held with specific consultation bodies and water companies following the Regulation 18 period in 2026, to inform the development of the Regulation 19 Local Plan. During these meetings, the Council has shared its working draft of the IDP to frame the discussions, as well as its Regulation 19 housing trajectory and allocations GIS data

with water companies to allow timely updates to their forecast of future supply-demand.

- 4.5 Specific consultation bodies (including Environment Agency, Natural England, and East Sussex County Council) and service providers (e.g. Southern Water and South East Water) have additionally been consulted on, and provided feedback through the development of evidence base documents where appropriate. Draft bilateral Statement of Common Grounds were circulated to each relevant bodies to establish areas of agreement and areas of outstanding resolution.
- 4.6 The evidence base, consultation responses, and discussions have informed the policy framework presented within the Regulation 19 Local Plan, as well as the content and schedule within the Infrastructure Delivery Plan.
- 4.7 The Council have taken the following actions to inform water management within the Local Plan, informed by consultation responses and other evidence:
- Reviewed and updated the Infrastructure Delivery Plan;
  - Undertaken a HRA of the Regulation 19 Rother Local Plan,
  - Undertaken a GBI study to inform the Local Plan;
  - Updated the Level 1 Strategic Flood Risk Assessment (SFRA) and prepared a SFRA Level 2 to inform proposed site allocations;
  - Prepared a Flood Risk Sequential Test and Exception Test, where necessary, to inform proposed site allocations;
  - Reviewed opportunities to cross-reference and reflect key strategies and guidance documents in the Local Plan;
  - Reviewed and, where appropriate, amended policies relating to water to ensure they align with national planning policy and relevant strategies;
  - Reviewed and, where appropriate, updated policies relating to water including to aid policy implementation (e.g. to provide clarity on site specific requirements for flood risk and water management);
  - Reviewed and, where appropriate, updated site allocation policies in line with the recommendations of the Rother HRA and SFRA.

## 5 Overall Approach and Conclusion

- 5.1 The evidence and consultation feedback demonstrates that water availability, wastewater infrastructure and flood risk are interconnected and should not be addressed in isolation.
- 5.2 The district's rivers, floodplains, wetlands, groundwater systems and coastal environments function as a connected blue infrastructure network that supports water supply, flood management, ecological health and environmental protection. Evidence informing the Rother Local Plan, and plans, strategies and frameworks developed by infrastructure providers and other statutory consultees demonstrate that future development must be planned and delivered in a way that recognises these interrelationships.
- 5.3 The Local Plan adopts an integrated approach to water management across topic policies and site allocations that seeks to address the following measures:

| Measure                                                                                                | How it is addressed through the Regulation 19 Local Plan (e.g. example of relevant policy)                                                                                                                                                                                                                                               |
|--------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reduce pressure on water resources through improved water efficiency standards                         | <ul style="list-style-type: none"> <li>Policy GTC4 (Water Efficiency)</li> </ul>                                                                                                                                                                                                                                                         |
| Ensure wastewater infrastructure is capable of supporting growth without adverse environmental effects | <ul style="list-style-type: none"> <li>Policy INF1 (Strategic Infrastructure Requirements)</li> <li>Policy ENV2 (Protection of Water Quality and the Water Environment)</li> <li>Policy ENV4 (Foul Water Drainage)</li> <li>Specific requirements of relevant site allocation policies to reflect comments of Southern Water;</li> </ul> |
| Minimise and manage flood risk from all sources                                                        | <ul style="list-style-type: none"> <li>Policy ENV1 (Flood Risk Management)</li> <li>Policy ENV3 (Sustainable Surface Water Drainage)</li> <li>Policy ENV6 (Rother Coastal Change Management Area)</li> </ul>                                                                                                                             |

|                                                                                                                                                       |                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Protect and improve water quality, via measures such as sustainable drainage hierarchy, foul drainage hierarchy, nature-based solutions, among others | <ul style="list-style-type: none"> <li>• Policy ENV2 (Protection of Water Quality and the Water Environment)</li> <li>• Policy ENV3 (Sustainable Surface Water Drainage)</li> <li>• Policy ENV4 (Foul Water Drainage)</li> <li>• Policy ENV13 (Green and Blue Infrastructure)</li> </ul> |
| Safeguard internationally important habitats and strengthen their functions                                                                           | <ul style="list-style-type: none"> <li>• Policy ENV3 (Sustainable Surface Water Drainage)</li> <li>• Policy ENV8 (Habitats and Species)</li> <li>• Specific requirements of relevant site allocation policies to reflect the recommendations of the Rother HRA</li> </ul>                |
| Improve resilience to climate change                                                                                                                  | <ul style="list-style-type: none"> <li>• Policies ENV1, ENV2, ENV8, ENV13</li> <li>• Policy LWL5 (Well-designed and distinctive places)</li> <li>• Policies of the Green to the Core chapter.</li> </ul>                                                                                 |

5.4 The site allocation policies have been prepared through careful consideration of the water environment and water management issues, as follows:

- Flood risk management – application of the sequential approach to seek to locate those areas at lowest risk of flooding from all sources, as set out in the Sequential Test, and where necessary, application of the Exception Test to ensure that development is appropriate;
- Habitats Regulations Assessment – HRA screening and where necessary Appropriate Assessment of the impact of proposed development sites on protected habitats and species, including consideration of the protected areas and qualifying features; water quality; and water quantity, level and flow;
- Consultation feedback from specific consultation bodies, including Environment Agency, Natural England and water companies.

5.5 The evidence base provides a clear and robust justification for the Local Plan's overall approach to water management, and demonstrates that the proposed policy framework can address the key water-related challenges facing Rother District throughout the period 2025-2042.



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