Wealden District Council

Date
04 August 2026

Contact
[redacted]

Your ref

Our ref

Dear Sir/Madam,

Hailsham Neighbourhood Plan Review Consultation (Regulation 16)

Thank you for consulting Southern Water on this Regulation 16 Consultation for the Hailsham Neighbourhood Plan. Southern Water is the statutory wastewater undertaker for the neighbourhood area.

We have reviewed the draft Plan with interest and note how well-integrated Hailsham's consideration of sustainable drainage solutions is across a range of policies and projects. Southern Water strongly supports all planning policies promoting SuDS.

Please find our formal response attached below for your consideration. In accordance with the requirements for Regulation 16 consultations, we frame our response in terms of compliance with the basic conditions for neighbourhood plans (as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990).

We hope that you find our response helpful and look forward to being kept informed of progress. Please contact me should you have any queries.

Yours faithfully,

[redacted]

[redacted]
Strategic Planning Lead for Kent and East Sussex

Cc Hailsham Town Council

WATER for LIFE from Southern Water

Policy HaGI 5: Flood Risk and Sustainable drainage

For compliance with the basic conditions for neighbourhood plans, policies must have appropriate regard to national planning policies and guidance from the Secretary of State – this includes the National Standards for Sustainable Drainage issued by Defra in June 2025. There is currently no reference to these Standards within the Plan. Instead, paragraph 8.35 of the Plan (that informs policy HaGI 5) refers to a June 2015 East Sussex County Council standard.

We note that East Sussex County Council now refers to the National Standards as a material planning consideration here - National Standards for Sustainable Drainage | East Sussex County Council and goes on to suggest that *'all new applications have taken into consideration the National Standards for Sustainable Drainage. It is recommended that a summary page is included within any drainage strategy which outlines how each standard has been addressed within the development of the design.''*

We therefore recommend that where possible, Neighbourhood Plan references (in paragraph 8.35 in particular) are updated to ensure links direct readers to the latest National Standards for SuDS.

Further explanation and evidence

Southern Water is an essential service provider across the south coast of England. We are proud to support sustainable growth across the communities we serve, but this growth must be delivered in a way that protects the environment and does not place unfair pressure on existing customers.

Southern Water considers that Sustainable Urban Drainage Solutions (SuDS) should be delivered in compliance with the National Standards for SuDS (Defra, June 2025) as appropriate to the nature and scale of each development. This should help manage surface water as close to source as possible, prevent surface water being discharged to foul sewers, and avoid discharges to combined sewers where this would increase storm overflow risk.

Southern Water is consulting with Local Planning Authorities and other stakeholders on a new Sustainable Development policy to help make new homes more water efficient and better for the environment. The policy sets out our proposed expectations for developers, including lower water use, rainwater harvesting and sustainable drainage, so that growth places less pressure on our water resources, wastewater networks and the environment. This is an environmental ambition; it is a strategic necessity. This is being driven by climate change, population growth, drought resilience requirements and the need for greater environmental protection. Rain and grey water harvesting for non-potable re-use will be key to conserving water resources and therefore an essential part of SuDS design across all development.

Following review of consultation feedback, Southern Water will publish a final policy supported by technical guidance where required.

The policy will update and refresh Southern Water's existing published policy statement on sustainable development. It will bring together our expectations on water efficiency, sustainable drainage, surface water management, nutrient neutrality and developer incentives for attaining various environmental criteria.

WATER for LIFE from Southern Water

Policy HaGI 6: Paving of Front Gardens

For compliance with the basic conditions for neighbourhood plans, policies must have appropriate regard to national planning policies and guidance from the Secretary of State – this would include the National Standards for Sustainable Drainage issued by Defra in June 2025. There is currently no reference to these Standards within the Plan. The Standards make clear that no discharges of surface water can be directed to sewers originally designed to be foul only. This is important to note for the Hailsham wastewater network that is designed to accept foul flows only. The Standards also provide a hierarchy of drainage destinations that must be exhausted before run-off can be discharged to other types of sewer eg combined or surface water sewers.

Also, whilst Southern Water supports the intention of policy HaGI 6 and its requirement to introduce SuDS, Southern Water is the statutory wastewater undertaker responsible for the wastewater network in Hailsham. Southern Water's consent is therefore required for any new connection to the network. We therefore recommend that where possible, section c of the policy is updated to read as below:

> *c. Incorporate Sustainable Urban Drainage Systems in compliance with the National Standards for Sustainable Drainage (Defra, June 2025).*

and where retained, section d is updated as follows:

> *d. Not direct any run-off to any public sewer without formal consent from the statutory undertaker responsible for that network (both to avoid adding to flood risk and to ensure pollutants do not enter the main river system). All such consent will be resisted by the statutory undertaker unless evidence demonstrates full adherence to the National Standards for SuDS.*

Further explanation and evidence

Southern Water is an essential service provider across the south coast of England. We are proud to support sustainable development across the communities we serve, but development must be delivered in a way that protects the environment.

Southern Water considers that Sustainable Urban Drainage Solutions (SuDS) should be delivered in compliance with the National Standards for SuDS (Defra, June 2025) as appropriate to the nature and scale of each development. This should help manage surface water as close to source as possible, prevent surface water being discharged to foul sewers, and avoid discharges to combined sewers where this would increase storm overflow risk. Southern Water will resist all connections of surface water to sewer networks unless evidence demonstrates that the hierarchy of drainage destinations provided in the National Standards for SuDS has been fully exhausted.

We support the intention of this planning policy to help ensure that the measures necessary to sustainable development are delivered in response to the climate crisis. Measures should support the attenuation of flows of surface water run-off from rainfall, as well as surface water infiltration into the ground wherever possible in the local environment.

Southern Water is working across our region to remove surface water from our networks in key areas. Even as we deliver this work, development continues to increase surface water run-off. We must therefore plan to ensure that rainwater is separated from wastewater in the design and construction of our communities, to ensure community resilience to the evolving impacts of climate change. For more information on our work, and the root causes of releases from storm overflows, please see –
https://www.southernwater.co.uk/our-region/clean-rivers-and-seas-task-force/pathfinders/
https://www.southernwater.co.uk/our-performance/storm-overflows/storm-overflow-task-force

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