



Sussex
Wildlife Trust

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Date: 20 February 23

By email only

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Safe, reliable drinking water for the next 50 years – Have your say on our draft water resources management plan 2025 - 2075

Thank you for consulting the Sussex Wildlife Trust (SWT) on your draft Water Resources Management Plan (WRMP). We are committed to continuing to engage across the water sector to ensure future investment delivers for nature. We are a member of the Blueprint for Water coalition and strongly support its 'Blueprint for PR24 – Environmental Outcomes for the Price Review'. SWT has therefore assessed the suitability and ambition of the WRMP against the outcomes and priorities set out by Blueprint.

Environmental Ambition

The resilience of our natural environment and our water sector are fundamentally interconnected. Yet our freshwater and coastal environment is suffering – fragmented, polluted and degraded, to the detriment of our communities, our economy, and our wildlife. SWT believes that the priority for all water company plans is to reduce the need for water resources as much as possible, and then secure those resources in the best way possible. This must be done in a way that meets the needs of the environment first, before considering how additional needs from businesses and households are met.

Water company plans must drive environmental improvements with the aim to fully restore past damage, including over abstraction. It is important for customers and other water users to understand that environmental improvement is generally trying to get us back to what should be there already, not going above or beyond. SWT thinks this should be made more explicit in the plan.

Overall, we are pleased to see that the WRMP reported pathway includes high environmental improvement and high climate change scenarios. SWT is very supportive of reduction in abstraction from chalk groundwater, however, it appears that in the nine future scenarios from Water Resources South East's draft Best Value Plan (BVP), the abstraction reductions only meet statutory requirements for the first 10 years, not the EA's enhanced scenario requirements. If this is the case, SWT would like to see water companies consult on options for embedding the enhanced scenario from 2025.

Whilst we understand the need for abstraction reduction decisions to be based on evidence, 10 years of environmental assessments for all the river catchments in the Portsmouth Water supply area is a long time. SWT encourages Portsmouth Water to fast-track this work and use WINEP to deliver some action on the ground to reduce abstraction needs and create a more resilient environment in the next five years. We are concerned that waiting until 2035 means more damage to our already degraded freshwater systems.

One concern with the growth pathways is the population decision point in 2030. It is not clear what evidence this decision will be based on. The ONS population growth figures appear to reduce at each publication and housing delivery in Sussex has consistently been lower than what has been planned for in Local Plans. This uncertainty needs to be accounted for when considering the growth pathway options in 2030.

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SWT would also like to see more ambition on carbon emissions with commitments to net zero by 2030 in line with other Sussex water companies. Carbon neutrality by 2050 is not ambitious enough.

Resilience through nature-based solutions

The WRMP states that the environment could be further improved by 'nature-led schemes to restore rivers and improve the landscape they sit in'. SWT is pleased to see Portsmouth Water working actively with the Arun and Western Streams Catchment Partnership on the River Ems, however it is not clear in the WRMP what other work is being done to increase resilience through nature-based solutions and catchment scale work. This is in contrast to Southern Water and South East Water's WRMP, which set this out more clearly.

SWT is disappointed by the lack of catchment-based schemes included in WRSE's BVP. We encourage Portsmouth Water to work within WRSE to increase commitment and confidence in catchment and nature-based solutions.

It is also not clear what Portsmouth Water's commitment is to natural capital accounting and biodiversity net gain (BNG). We have not been able to see the assessments on these in the SEA appendices due to them only being available from the Portsmouth Water offices. We are concerned that the WRMP states that the Havant Thicket reservoir is resulting in BNG, as it is our understanding that the development is resulting in the loss of ancient woodland, an irreplaceable habitat, which means BNG is not possible. SWT would strongly support a clear commitment to delivering at least 20% BNG for new infrastructure, with particular focus on supporting emerging Local Nature Recovery Strategies.

Demand reduction

Demand reduction must be a significant component of a WRMP and SWT is pleased to see significant investment in this area. However, the target for reducing household water use to 119 litres per person per day by 2050 is over the government's target of 110 litres and is significantly less ambitious than Southern Water's Target100 and timeline of 110 litres by 2040. Similarly, Blueprint recommends that WRMPs aim to reduce absolute Distribution Input by at least 15% by 2040. For the preferred programme under the Normal Year Annual Average scenario and taking the baseline of 2022-23, the plan appears to result in a reduction in DI of around 12.5% by 2040. This does improve to a 16% reduction by 2070, but this is much later than the Blueprint recommendation. Portsmouth Water should work to improve this.

Portsmouth Water is falling behind Southern Water and South East Water when it comes to leakage reduction. We understand that Portsmouth Water had the second lowest leakage rate of water companies in England and Wales last year, so are starting from a low baseline. However, it appears the WRMP will fail to deliver the WRSE target of 50% reduction by 2050. We strongly encourage Portsmouth Water to pursue the stretch targets set out in the 25-year vision.

We applaud the ambition to get smart meters installed in 94% of homes supplied by Portsmouth Water by 2040. However, delivery of this appears to be behind schedule. We encourage Portsmouth Water to ramp up installations to try to bring the target of 94% forward. SWT is supportive of the use of tariffs to incentivise water efficiency.

We are pleased to see Portsmouth Water's plans to reduce non-household water use through assessments and leak detection for high-water users. However, we note that the WRMP forecasts non-household consumption to increase by around 8% by 2070. This is concerning, and we would like to see Portsmouth Water do more to address this issue through offering greater, more flexible incentives for curbing business demand.

SWT strongly encourages the water industry to lobby government and policy makers to adopt more water efficient policies and standards. We would like to see government interventions adopted sooner wherever possible. Any extra demand reductions resulting from earlier implementation of national policy should be

additional to the WRMPs committed reductions and not used to offset any underperformance on demand from companies.

Any demand management options must be realistic and properly resourced. SWT agrees that close monitoring of demand reduction is key. The WRMP states that if monitoring shows that demand reduction is less than planned, then more infrastructure/supply side options may be needed. However, SWT would like to see monitoring first trigger more investment into demand reduction options, rather than straight to increasing supply.

Yours sincerely,

Jess Price
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