



Sussex
Wildlife Trust

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By email only

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South East Water - Draft Water Resources Management Plan 2025 to 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 is therefore pleased to see the WRMP acknowledge the need to leave the environment in a better place for future generations.

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 and the WRMP including plans to meet environmental flow targets. We are pleased to see that the two additional supply scenarios in the WRMP are broadly in line with the National Framework Enhanced scenario until 2045. 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. SWT would like to see water companies consult on options for embedding the enhanced scenario from 2025.

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.

SWT would also like to see more ambition on carbon emissions with plans for net zero by 2030 including embedded emissions, not just operational.

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Resilience through nature-based solutions

SWT strongly supports the integrated catchment management approach set out in the WRMP. We are pleased to see catchment-based solutions set out for the Sussex region and would support the prioritisation of catchment and nature-based solution delivery. In particular, we support the delivery of catchment programmes through WINEP that result in action on the ground, rather than investigations.

SWT is disappointed by the lack of catchment-based schemes included in the WRSE BVP. We encourage South East Water to work within WRSE to increase commitment and confidence in catchment and nature-based solutions. Whilst South East Water's WRMP should be aligned with the regional BVP, we would not want WRSE to hold back South East Water's ambition.

SWT supports the commitments to natural capital and biodiversity net gain (BNG) listed in the WRMP (e.g. page 38). However, it is not clear how these commitments have influenced the plan. For example, the strategic environmental statement includes BNG and natural capital assessments, however most of the options considered result in a loss to biodiversity. SWT would strongly support a clear commitment 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 112 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 only around 6% by 2040. This does improve to a 15% reduction by 2070, but this is clearly much later than the Blueprint recommendation, which is concerning. This needs to be addressed.

South East Water is also falling behind Southern Water when it comes to leakage reduction, only aiming for a 22% reduction by 2030. Whilst the WRMP does aim to meet the WRSE target of 50% reduction by 2050, we feel this could be more ambitious, with South East Water investing now to drive down leakage more significantly in the next 10 years.

We understand that South East Water wants evidence on the effectiveness of smart metering, but we do not believe this needs to take five years, especially given that other companies are ahead in terms of smart meter deployment. Overall, South East Water should be ramping up effective demand measures more quickly and increasing the pace of smart meter and water audit roll out. SWT would also like to see more targeting of high water users, including in the business sectors. SWT is supportive of the use of tariffs to incentivise water efficiency.

We note that the WRMP forecasts non-household consumption to increase by around 13% by 2070. This is concerning, and we would like to see South East Water do more to address this issue through offering greater, more flexible incentives for curbing business demand. We are pleased to see South East Water working with other abstractors in two surface water catchments to reduce the overall volume of water abstracted.

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.

We do support South East Water's proof of concept trials on water neutrality in new developments and encourage the company to share learnings on water neutrality with WRSE and throughout the water industry. SWT would like to see water neutrality as the norm when it comes to planning for growth.

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.

Supply options

Whilst the absolute priority should be ambitious demand-side measures, SWT acknowledges that there will still be a need for new schemes to meet the supply shortfall. SWT supports the use of supply side options that are the least environmentally harmful and, ideally, where benefits to the environment can be delivered. Unfortunately, the high-level nature of the WRMP and numerous technical documents have made it difficult to determine if this is the case.

The biodiversity net gain assessment in the SEA demonstrates that reservoirs have potential to deliver gains, along with natural capital enhancements. In general, reservoirs are a lower carbon option compared with desalination and water recycling and can provide multiple benefits for people and wildlife. SWT therefore supports the alternative plan and encourages the timetables for additional reservoirs to be brought forward. SWT is very concerned about any commitment to desalination due to the likely significant adverse environmental effects, particularly for marine biodiversity.

Yours sincerely,

Jess Price
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