



**Sussex**  
Wildlife Trust

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Securing a resilient future for water in the South East - A consultation on our draft Water Resources Management Plan

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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 is 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. We therefore question wording such as 'we will need to leave more water in the environment to keep it healthy' (page 4, non-technical summary). Our wetland environments are not currently healthy, and more water is needed to restore them and prevent further degradation.

Overall, we are pleased to see that the WRMP reported pathway includes high environmental improvement and high climate change scenarios. SWT is supportive of reduction in abstraction from chalk groundwater and the WRMP including plans to meet environmental flow targets. However, it is not clear whether these plans account for the EA's enhanced scenario targets. If not, this should be addressed. The low environmental improvement scenario should be the minimum expected by regulators, with the medium and high going above this. SWT also strongly supports a WINEP programme that includes action on abstraction reduction, rather than primarily investigations. We would also like to see Southern Water stop using drought orders and drought permits as soon as possible and support 2040 at the latest date this will happen.

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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### Resilience through nature-based solutions (NbS)

SWT strongly supports proactive use of catchment and nature-based solutions to restore the environment, improve water quality and lower operational carbon emissions. The WRMP states that the aim is to take a twin-track approach using traditional engineering schemes where needed to achieve compliance, with catchment and nature-based solutions being used to reduce reliance on this. We strongly support reducing reliance on engineering schemes and would like to understand more clearly what compliance issues are driving engineering over NbS.

SWT is disappointed by the lack of catchment-based schemes included in the Water Resources South East draft Best Value Plan (BVP). We encourage Southern Water to work within WRSE to increase commitment and confidence in catchment and nature-based solutions. Whilst Southern Water's WRMP should be aligned with the regional BVP, we would not want WRSE to hold back Southern Water's ambition on the Nature First programme. Additionally, Southern Water's WRMP needs to be seen to work holistically with the DWMP and Southern Water's requirements around water treatment. Although regulatory bodies keep water resources and waste water separate, they are fundamentally interlinked and should be planned for together.

### Demand reduction

SWT is very supportive of Southern Water's industry-leading position on demand reduction. Compared to other water companies in the South East, Southern Water is leading the way on leakage and water efficiency. SWT is pleased to see the WRMP meeting the government's target of 110 litres of water per person per day by 2050, and strongly supports the more ambitious target of 100 litres per day by 2040. We also encourage Southern Water to commit to its higher target of 62% leakage reduction by 2050.

That said, 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, but after this point, total DI creeps up again with a figure for 2070, which is only 6% less than the baseline. This is concerning.

We note that between 2023 and 2025, Southern Water aims to increase the number of homes with meters from 88% to 92% and start fitting smart meters. The data from the technical appendices seems to indicate that metering stops in 2030 at 1,950,000 meters. We assume this is because 100% of households will then be metered, but this should be made clear.

SWT supports the use of tariffs to incentivise water efficiency and we strongly encourage 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.

We note that for the North Sussex Supply Zone, Southern Water believes that a significant proportion of household growth has already been accounted for in WRMP19. However, WRMP24 states that some demand targets for WRMP19 were not met, primarily due to changes in working practices and water usage due to the pandemic. The WRMP24 needs to explain how this under delivery has been accounted for in terms of the Water Neutrality Mitigation Scheme for the North Sussex Supply Zone. We do encourage Southern Water 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.

The WRMP does not contain a great deal of information on Southern Water's work to improve water efficiency within the Non-public Water Supply. It appears that non-household consumption is projected in the WRMP to go up by 13% between 2019 and 2070. This is concerning, and we would like to see Southern Water work more closely with businesses to address this issue.

### 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. For example, the strategic environmental statement includes biodiversity net gain, natural capital and carbon accounting as criteria for assessing the best value options. However, it is not clear what weight these metrics have had when it came to choosing options or what the chosen options will deliver for these issues. It is also not clear what the overall ambition for BNG is. SWT would strongly support a commitment delivering at least 20% BNG for new infrastructure, with particular focus on supporting emerging Local Nature Recovery Strategies.

The biodiversity net gain assessments included in WRSE's BVP demonstrated 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. In contrast, desalination is energy intensive, costly to operate and likely to have significant environmental impacts on the marine environment. The most significant of these impacts, is the release of brine effluent into the coastal environment and the consequent acute and chronic toxic effects on marine organisms. SWT also has concerns about potential dilution mechanisms used for brine effluent, with regards to the source of dilution solutions and the impacts of these solutions on water quality when released. We also note the potentially destructive impacts of the suction pipes delivering water to the proposed desalination plants, which have been estimated to kill billions of fish annually and are a particular risk for larval stages of aquatic fauna.

SWT is therefore very concerned that a desalination option is being progressed before a reservoir for West Sussex.

That said, the WRMP seems confused on the prospect for desalination on the Sussex coast. The WRSE BVP is clear that a desalination plant within the first 10 years of the plan is a must and is critical to the delivery of the BVP. In contrast, the WRMP states that Southern Water may need to introduce desalination near the tidal River Arun, and that the coastal desalination scheme has proved to be undeliverable at the proposed location of Shoreham Harbour so an alternative is needed.

SWT is extremely concerned about the feasibility of Southern Water progressing desalination by March 2027. It is clear that further work is needed to understand the impact of desalination and SWT is very dubious that that a scheme could be progressed without significant negative impacts on the environment. In contrast to Southern Water, South East Water have partially constrained the delivery of its proposed desalination project to later in the plan to allow time for investigation and technological advances due to the environmental risk and high operational costs.

SWT encourages strong cross-company collaboration on investigating how to avoid and mitigate any harms from desalination, for example through UKWIR or shared learning via the Water Resources Senior Steering Group. Overall, we do not believe that the knowledge or evidence is sufficient to demonstrate that a Sussex desalination scheme is feasible or deliverable within the first 10 years of the plan and this concerns us.

Yours sincerely  
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Sussex Wildlife Trust