



**Sussex**  
Wildlife Trust

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## Futureproofing our water supplies – A consultation on our draft Regional Plan for South East England

Thank you for consulting the Sussex Wildlife Trust (SWT) on your draft Best Value Plan (BVP). 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 BVP 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.

Given this position, SWT is concerned that the BVP appears not to be meeting environmental needs under the EA's 'enhanced scenario'. Page 14 of the summary document states that '*Our high abstraction reduction scenario meets the current expected level of reduction set by regulators*'. It is not clear why WRSE would be considering scenarios with lower abstraction reduction than the minimum expected by regulators. SWT believes that the lowest abstraction reduction scenario should meet the regulators minimum expectations, the medium reduction scenario should meet the EA's enhanced scenario and the highest reduction should go beyond this. This way, WRSE can gather stakeholder views on support for even greater abstraction reductions that put the needs of the environment first.

SWT does strongly support the prioritisation of chalk streams, designated sites, headwaters and tributaries and the need for evidence-based decision making (page 15). However, we believe that 'no regrets' decisions around the environment could be more ambitious now, with evidence gathered over the next 10 years used to further this position. SWT would also like to see more environmental improvements locked in from the lifetime of the plan. It currently appears that there is no certainty for the environment beyond 2035, with little practical action taking place in the next 10 years. Any investigations into abstraction reductions need to be fast tracked, so that action can be embedded into the next round of plans, not after 2035.

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### Resilience through nature-based solutions

SWT was very pleased to see the emerging plan considering around 300 catchment schemes and support one of the four priorities for the BVP being '*catchment and nature-based solutions that improve the water environment we rely upon*'. However, despite this priority, the BVP only contains one catchment-based scheme. We understand that this is the result of regulatory guidance stating that catchment-based schemes should be included in water company business plans. However, it is not clear why the BVP cannot go beyond the guidance in this regard. Natural landscapes play a vital role in providing clean water resources and as such WRSE should be prioritising nature-based solutions that bring multiple benefits. We cannot see any evidence that catchment and nature-based solutions that improve the water environment we rely upon are truly a priority in the plan. This should be addressed.

There is already a significant evidence base when it comes to nature-based solutions. Whilst further evidence and understanding is welcome, SWT believes that 'the next 10 years' is too long a timeframe given the urgency of the both the water resources situation and the climate and biodiversity crises. WRSE should be prioritising catchment-based schemes and supporting water companies to embed them in plans now.

### Demand Reduction

SWT is pleased to see the BVP prioritise demand reduction. However, more should be done to ensure that the national ambition to reduce householder water use to 110 litres per person per day by 2050 is met. As it stands, the BVP will bring this to 115 litres, which whilst close, is not sufficient. We encourage WRSE to work with Thames Water to bring their per capita consumption down in line with the other water companies. Similarly, there is more for Thames Water to do on leakage to bring them in line. This should absolutely be prioritised before considering supply side options.

Any demand management options must be realistic and properly resourced. SWT agrees that close monitoring of demand reduction is key. The BVP 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 are pleased to see that the BVP makes clear that the forecast demand reductions are reliant on water efficient government policies coming through. WRSE's analysis shows that bringing in some policies sooner could provide an extra 300 million litres of water per day. SWT strongly supports more ambitious timelines for the introduction of government policies and encourages WRSE to commit resource to lobbying for this. Any extra demand reductions resulting from earlier implementation of national policy should be additional to the BVPs committed reductions and not used to offset any underperformance on demand from companies.

### 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 BVP and numerous technical documents has made it difficult to determine if this is the case. For example, see our comments on Biodiversity Net Gain below.

Page 19 of the BVP sets out that the first 10 years of the plan includes the schemes that the water companies **must** progress as they are considered 'least regrets' schemes that are required regardless of differing future scenarios. However, for Southern Water, one of these schemes is a Sussex coast desalination plant, which does not appear to be at all well developed. SWT is extremely concerned about the feasibility of Southern Water progressing desalination within this timeframe.

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.

The BVP acknowledges that further work is needed to understand the impact of desalination. 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.

#### Biodiversity Net Gain (BNG) and Natural Capital

SWT supports the use of BNG and Natural Capital accounting to inform the options in the BVP. However, it is not particularly clear from the BVP what the ambition is for BNG. Looking at the Natural Capital Assessment and Biodiversity Net Gain Report (WRSE Draft Regional Plan SEA Environmental Report – Appendix J), most options considered in the BVP are resulting in a net loss to habitats, natural capital assets and corresponding ecosystem services. This is clearly not acceptable. Whilst some potential mitigation and enhancement options are suggested, there appears to be no certainty as to the likely outcomes. Appendix J does recognise that catchment management options have potential to provide BNG, but they have not been assessed as part of the report. Overall, this is very disappointing.

SWT would like to see a clear commitment in the BVP to delivering 20% BNG for new infrastructure, with particular focus on supporting emerging Local Nature Recovery Strategies. Additionally, clear evidence should be provided to demonstrate that Natural Capital Accounting has inputted into the option appraisals, with those schemes benefiting the environment the most being prioritised.

#### Net Zero

The SEA shows the BVP has major negative residual effects for the objective on carbon emissions for both construction and operation. It is also not clear that the carbon accounting for the plan includes Scope 3 emissions. If not, it is likely that the carbon emissions will be even higher than reported. SWT believes that the BVP should be preferentially choosing solutions that reduce total carbon emissions as much as possible. The plan could then consider options for offsetting residual emissions. There appears to be a lot of scope for this through the potential catchment solutions, which again suggests that these should be included in this plan as fundamental components of the solution to the multiple challenges WRSE is facing.

#### Non-Public Water Supply

SWT is pleased to see that the BVP considers the needs of other non-public water supply sectors. However, the work around this seems limited, with a large amount of further work still to do. We note that the three water companies supplying in Sussex will all see increases in overall non-PWS consumption over the lifetimes of their WRMPs. This is not acceptable and WRSE should be prioritising this issue in the BVP. We would like to see clear commitments from significant non-PWS abstractors and/or their trade bodies to ensure the water they need is used efficiently and that their demand is reduced as much as possible.

Yours sincerely,

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