

# **Drainage and Wastewater Management Plan (DWMP)**

## **Public Consultation Report: Summer 2022**

### **Appendix: Consultation Responses**

January 2023

# Section 1: Responses from Customers

ID 1001

**Organisation**

self

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

1. The calculation of a WwTW based on Dry Weather Flow ie the driest 73 days of the year is totally unfit for purpose and makes no allowance for capacity in the increasing levels of wet weather we can expect in the future. As well as assessing the hydraulic capacity of the treatment works, the regulatory framework also needs to assess the capacity of the catchment network which currently has no oversight.
2. Planning authorities have no access to technical data assessing capacity and are not allowed to refuse planning permission on the grounds of lack of capacity. Water companies are obliged to connect regardless of capacity. This planning framework inevitably leads to the chaotic situation we have at present.
3. Reducing water consumption calculations from 500 litres per household will give an illusory increase in capacity. It is totally unenforceable. The increase in effluent density will inevitably result in the ever-increasing blockages which are evident from Southern Water's report (60% of discharges).

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Southern Water need oversight of these organisations.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

don't understand question 6?

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

1. The calculation of a WwTW based on Dry Weather Flow ie the driest 73 days of the year is totally unfit for purpose and makes no allowance for capacity in the increasing levels of wet weather we can expect in the future. As well as assessing the hydraulic capacity of the treatment works, the regulatory framework also needs to assess the capacity of the catchment network which currently has no oversight.
2. Planning authorities have no access to technical data assessing capacity and are not allowed to refuse planning permission on the grounds of lack of capacity. Water companies are obliged to connect regardless of capacity. This planning framework inevitably leads to the chaotic situation we have at present.
3. Reducing water consumption calculations from 500 litres per household will give an illusory increase in capacity. It is totally unenforceable. The increase in effluent density will inevitably result in the ever-increasing blockages which are evident from Southern Water's report (60% of discharges).

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

1. The calculation of a WwTW based on Dry Weather Flow ie the driest 73 days of the year is totally unfit for purpose and makes no allowance for capacity in the increasing levels of wet weather we can expect in the future. As well as assessing the hydraulic capacity of the treatment works, the regulatory framework also needs to assess the capacity of the catchment network which currently has no oversight.
2. Planning authorities have no access to technical data assessing capacity and are not allowed to refuse planning permission on the grounds of lack of capacity. Water companies are obliged to connect regardless of capacity. This planning framework inevitably leads to the chaotic situation we have at present.
3. Reducing water consumption calculations from 500 litres per household will give an illusory increase in capacity. It is totally unenforceable. The increase in effluent density will inevitably result in the ever-increasing blockages which are evident from Southern Water's report (60% of discharges).

ID 1002

Organisation

None

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

No explicit mention to stop discharging untreated sewage into our seas and rivers.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Collaboration is good but ultimately providing suitable infrastructure is solely your responsibility.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

4. Prioritising sorting out pollution will enhance the environment. Sewage on the beach and rivers is shocking.

5. From what I understand the Victorian combined system sewers are the cause of the discharge problem. Sort it properly at source, don't just build a bigger storage tank.

6. Whatever works best - for today and for 30 years' time.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Change your investment approach and stop taking the low-cost route

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Yes but you should reduce shareholder dividends before increasing bills.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

But it's just words - put money where your mouth is & change your spots

**What do we need to improve in our DWMP?**

ID 1003

Organisation

N/A

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

All of those identified but particularly population growth, environmental permits, inadequate water treatment assets and maintaining environmental health, safety and cleanliness of water courses, harbours and coastlines.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Clearly a coordinated approach to managing a complex issue affecting everybody who lives in the region is more likely to yield a long term and beneficial outcome for all concerned. This is as much a benefit to Southern as it is to their customers to avoid penalties and excessive controls in the future.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Sewer Condition and Groundwater Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Sewer condition and flooding avoidance will contribute to wastewater compliance and environmental enhancement. Hence the latter two are key. Removing run off water from foul sewage would yield the biggest opportunity to manage foul sewage systems to a much higher standard than currently and if I understand correctly managing this on a larger scale should yield the bigger benefit. A combination approach is likely to be required in any eventuality.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Least cost is least likely to prove satisfactory. However, a failure to invest adequately over many years has led us to this point. It would be unacceptable to load all additional costs onto customers given the profits the company has created by failing to invest and acting in an illegal manner with regard to sewage outfalls over the recent past.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

An increased cost is acceptable but a failure to invest adequately over many years has led us to this point. It would be

unacceptable to load all additional costs onto customers given the profits the company has created by failing to invest and acting in an illegal manner with regard to sewage outfalls over the recent past.

**I support the range and type of investment needs identified in the five Investment Plans**

(4) Strongly disagree

**Please explain your answer:**

Far to extensive for such a simple answer.

PO13 states that bathing water quality is excellent using W Wittering and Eastoke as examples (on the open seashore) but releases into Chichester harbour result in a moderately significant risk of faecal contamination inside the harbour where multiple water sports likely to result in immersion in the water take place (swimming, kayaking, SUP's, dinghy sailing, windsailing etc)

PO10 Surface water management - up to 88% is "non foul" so it's critical to address this soon, not medium to long term.

PO9 considered to be non-significant risk of not achieving GES/GEP yet shellfish fishery and seabass nursery area in Chi harbour with moderate risk of faecal contamination!

PO6 Thornham WTW has no record of compliance failure during 2018-20. "No record" is not satisfactory given previous history of poor record keeping.

PO5 Storm overflow compliance in Chi harbour is "very significant" - is this because it is so obviously visible?

PO1 Yes, 60% due to customer causes which need addressing, including discussions nationally with manufacturers of "flushable wipes". But, 40% is due to issues with sewers and rising mains so this also needs urgent attention.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

Systematic approach to consideration of major issues.

**What do we need to improve in our DWMP?**

Much clearer, much shorter.

A real focus on solving complicated interrelated problems as opposed to having a "strategic plan" which can be waved at regulators.

ID 1004

**Organisation**

N/A

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

While references are made on pages 10 & 11 to the need to protect habitats there is little recognition until much further in the DWMP of the importance of healthy, biodiversity rich, natural environments and the benefits they provide people i.e. not from the purely economic point of view with respect to their exploitation and for recreation, but from the point of view of them being 'life support systems' that provide clean water, food by way of healthy soils, elimination of pollution and nutrient cycling, control of flooding, and regulation of the climate. In fact, the challenge of climate change and the ecological crisis need to be recognised as twin, interconnected crises that are destroying those life support systems. It should be made clear that a main challenge for drainage and wastewater management is the urgent need to help address the significant level of biodiversity depletion in the UK by working to help ensure that there is no further deterioration in the health of aquatic environments but instead there are significant improvements in their ecological status.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

It is clear that Southern Water can only influence that which is within its direct influence and will not necessarily have within the organisation the wide range of knowledge and expertise it requires to deliver the expected benefits of the drainage and wastewater management plan. Conversely, Southern Water will have knowledge and expertise it could lend to other organisations with responsibilities for drainage and wastewater management. Cooperation with neighbouring water companies and water suppliers to the region could bring useful synergies.

However, it is also the case that Southern Water needs only meet the standards set by government. However, the standards set by government are not necessarily those that customers aspire to, for example customers are generally dismayed at the legal discharge from storm overflows into inland waterways and the marine environment. Though the set standards do not prevent Southern Water meeting better standards there are other constraints that would provide a barrier, usually a legal one, to Southern Water doing so, for example an interpretation of Section 172 of the 2006 Companies Act that considers extra expenditure to meet standards not required by law not to be an action that would be most likely to promote the success of the company for the benefit of its members as a whole. Also, the level of additional investment required would likely need to be met to a greater or lesser extent by an increase in water charges. At a time of a cost-of-living crisis with other living costs on the increase another price rise would be unpopular and likely to be blocked for social and political reasons. Southern Water should therefore also be working with the authorities, including the government, to see where standards and regulations on other sectors which have an impact on volume and pollution load of wastewater that Southern Water needs to deal with can be applied. For example, regulations and standards can be imposed in the areas of development, road building and urban planning which require developments to incorporate the use of rainwater and grey water for non-drinking purposes, and drainage from roads and other hard surfaces where run-off may collect pollutants be required to be channeled through suitable SuDs rather than entering the drainage system and potentially discharged into rivers and the sea. The costs of these measures would therefore form part of the cost of the development creating the problem rather than falling on water customers in general or resulting in harm.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Priorities 2-4 can be addressed to some extent by meeting priority 1. Priority 2 is important because of its impact of pollution on the environment as is priority 3, plus the impact of groundwater pollution on the supply of water to households and other customers. Addressing priorities 1-3 should have an impact on sewer flooding i.e. reduce the instance of it, though potentially any reduction of flow may increase the likelihood of blockages. Any residual or introduced risk of sewer flooding once priorities 1-3 have been addressed should be tackled (priority 4).

The use of catchment wide and nature-based solutions deliver additional environmental and social benefits that would not arise from purely traditionally engineering solutions. They also have the benefit of being more visible once they have been implemented. While both nature-based and traditional engineering solutions may cause inconvenience and disruption while they are being implemented the traditional engineering solutions are generally hidden once complete so do not leave anything to be enjoyed to compensate for the disruption and inconvenience. Nature based solutions give more opportunity to deliver to the community an asset they can enjoy.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Focusing just on cost usually ends up being more expensive in the long run as the cheaper options fail to meet their objectives, introduce additional problems, do not work long term etc. In the case of the wastewater system the long-term costs may not just be financial but also the more important costs of the further degradation of the environment and further loss of biodiversity as well as impacts on human health and wellbeing.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Increased customer bills may be inevitable but ideally, given the severe cost of living crisis, measures should be taken to reduce the impact of increases of customer bills, in particular for those on lower incomes.

Options could include:

- As previously stated where development, such as new buildings, roads or other areas of hard standing, give rise to additional run-off the cost of addressing that run-off so it does not impact the waste water system, either in terms of increased pollution load and/or increased volume of wastewater, should be part of the cost of development and not fall to the water company customer in the form of increased bills to address an increasing problem.
- The threshold for eligibility for the low income tariff could be raised and/or other method used to protect those on lower incomes e.g. higher tariffs for high consumers (though consideration needs to be given to customers who have a high usage due to personal, such as medical, needs).

Re-nationalisation of the water industry so that profits are re-invested into the infrastructure rather than paid in dividends and bonuses.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

I couldn't find them on the website. The presentation of the DWMP and the supporting documentation is (was) somewhat confusing and a challenge to use.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

I like the approaches to reducing storm overflow use and the flooding risk that prevent hard surface, particularly road run-off entering waterways without being appropriately filtered / cleaned and slowed down first.

I also liked the recognition of the problem of nutrients and the acknowledgement that all of the contribution of pollutants from different sectors add up to increasing pressure on habitats and ecosystems. I note that the Environment Agency focus seems to be on nutrient neutrality, which, of course does not help where the environment is already overloaded, but that the DWMP mentions the intention by Southern Water to reduce nutrient loading through its investment plans.

**What do we need to improve in our DWMP?**

There is a comment on page 11 regarding Tightening Environmental Permits which states "Over 24% of our WTW already have challenging quality permits and we are using the best available technology on some sites to achieve these." It is not clear whether this means that you are using the best available technology to achieve compliance at only some of the 24% of sites that need to, which raises the question why you are not aiming to achieve compliance at all of the 24% of WTW (ignoring the 76% of WTW that do not seem to have these challenging quality requirements), or does it mean that some of the 24% of WTW currently do not meet the compliance targets and that you are addressing this?

I have already made the point about the need to give more prominence to the importance of the natural environment because of the ecosystem services (i.e. the planet's life support systems) it provides.

On page 22 there is a statement recognising your duty to protect the environment and that 'no harm through pollution incidents is the minimum' customers should expect. The problem is what is the definition of a pollution incident. While the government, through the Environment Agency' may set limits for acceptable levels of pollutants entering the environment the person in the street would consider any pollutant entering a waterway or sea to be a pollution incident. There are a number of pressures on the government and Southern Water as a commercial entity, and conflicting priorities driving the acceptance of some level of harm to the environment (and labelling it as 'no harm'). To give confidence in the plan it should be honest about the constraints within which Southern Water operates and why at the present time (with current legislation and regulations) No Harm is unlikely to be achievable.

I question the need to develop a common methodology for the valuation of ecosystem services (Page 55). Such methodologies already exist. If there is a need for a specific method, then the reasons should be stated.

It is not the case that widespread public concern about discharges from storm overflows is recent. Surfers Against Sewage

started in 1990, which was also the year that there were at least two questions about storm overflows recorded in Hansard.

For transparency and to give confidence to customers and other interested parties regarding the plan and Southern Water's intent to follow through on it, Southern Water should include in the plan an undertaking that regular reports on progress will be given to the Regulator and the Environment Agency (whether or not this is a statutory obligation in any case) and also to all local councils in the Southern Water operating area, and other relevant authorities and interested parties. It should be possible for an Organisation or other interested party to apply to receive progress reports. Such applications should be granted unless there are specific, stated, legal or commercial reasons why they cannot be.

ID 1005

**Organisation**

local resident

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

For Southern Water to STOP pumping raw sewage into our seas

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(4) Strongly disagree

**Please explain your answer:**

You have the responsibility to ensure that sewage is not pumped into the sea.

Trying to collaborate with others does NOT absolve you of this responsibility.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Least cost often results in more money being spent over the long term ie it may not be the best solution

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

Southern Water should use its already hefty profits to ensure that they are putting the investment where it is needed - not rely on the consumer to foot all the bills for this. Director bonuses should not be paid if you can't do your job properly.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

I think it is too little too late - I think you should have been ensuring that our waters were clean and clear all along.

I like the fact that you now have a plan - but a 20-30 year timeframe is too long and I won't see any benefit. It should have a shorter time frame.

**What do we need to improve in our DWMP?**

Improve the timescales you refer to. Just do the job we are paying you to do. Do it well and no-one will complain.

ID 1006

**Organisation**

None

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

The reuse of water within properties, instead of sending wastewater into an archaic system it would be much better if it could be reused in situ, e.g. greywater

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Working with builders and environment agencies should be a must. Firstly, we must protect the existing supplies and wildlife that depend on water and then consider how best to provide future needs

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Clearly engineering approaches aren't working and a more environmentally friendly approach is needed

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Most expensive is not always best. Most cost-efficient approach with optimum outcome must be best approach

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

A balance is needed, with rising energy costs. Higher water bills will be a tough ask

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

Greater focus is needed to reduce usage, waste and recycling of water at household level, e.g 2 sinks, one for greywater, when running taps to get hot water, water from cooking etc which can be used again on site and dirty water that needs industrial filtering and cleaning.

ID 1007

**Organisation**

N/a

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

**What do you consider to be the most important future challenges?**

Prioritising investment in clean water, leak prevention & separating grey & black flows - ahead of shareholder dividends or executive bonuses

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

So long as this does not involve shirking responsibility

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

See my answer above about how Southern Water uses its cash - the promise of privatisation (investment, infrastructure improvements, lower bills to consumers) has not been delivered.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

The company has used borrowing to fuel shareholder dividends. That is not acceptable. Band 0 should be achieved without significant cost increases to consumers

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

It's very long, not optimised for accessibility & seems designed to deter consumer responses

**ID 1008**

**Organisation**

N/A

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

Clearly the first step should be a total change of culture within Southern Water. Profits based on a private monopoly which the company has thus far been able to exploit to the full are quite simply no longer acceptable, regardless of the ideology of the present government and its resistance to any suggestion of obliging water companies to start mending their extravagant ways and start mending all the broken networks they were given to run. It is immoral.

That you've been pouring untreated sewage onto our beaches and rivers yet again, without having properly working (or any) monitors is just you're telling us you don't give a damn. So why should we give a damn about your corporate culture?

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Because it is self-evidently the right thing to do. Water supplies and sewage disposal are highly interconnected and of critical importance to every inhabitant of this island.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q6: While "nature based" might seem the obvious choice, nature herself appears likely to require some engineered help.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

It is clearly well past the time when long-term investment should have been implemented. The results of short-termism are with us now.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

Oh, come on! SW and other water companies have had years in which to research and invest in long-term solutions, but have preferred to pay themselves bonuses, you'll still have those bonuses if you change priority, but that's no justification for exploiting customers - who were never asked.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

See Q1. Unless and until all water companies have earned public trust in them, I decline to trust any promises.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It is long past the time to have started thinking about actually providing a working service rather than cheap fixes and profits anyway.

**What do we need to improve in our DWMP?**

ID 1009

**Organisation**

myself

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

The most important challenge is for water companies to take full responsibility for a) dumping sewage in our waterways and b) for the number of leaks which are left unrepaired. There has been insufficient investment. Too much money has gone into paying executives and shareholders while the public cannot use rivers and the sea for recreational purposes. Despite the enormous fine this carries on happening. Climate Change has been known about for a long time not just now. You are now, consulting, on very technical documents of 74 pages. This is not a consultation as many people will not bother as the process is unwieldy and certainly not user friendly.

House building in areas where there is little capacity is a huge problem. You should not be agreeing to connect where you know you cannot.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(5) No opinion

**Please explain your answer:**

Of course you should be but none of the organizations seem to be fit for purpose either.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

All of those should be equal priorities

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

If SW had been investing sufficiently the situation, we are in wouldn't have arisen. This has been mismanaged for too long.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

I don't understand the question

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

Stop paying huge amounts of money to CEO's and shareholders. Water is a necessity and there is no competition either. Water companies need to be in public control.

ID 1010

**Organisation**

Sea swimmer

**Are you happy to be contacted about your feedback?**

No

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

Not to fill our sea and rivers with sewage. Invest the money we pay to have a water system fit for purpose rather than paying huge amounts to shareholders and CEOs. You should be held accountable by the authorities, the government and the public for your failures.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Planning of new houses puts more pressure on water systems. Developers should be accountable too rather than just reaping huge profits.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(5) No opinion

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

I expect you to sort it all out and use our money to make the system fit for purpose in all areas.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(5) No opinion

**Please explain your answer:**

Use our money to create a system fit for purpose instead of taking massive amounts out to give to shareholders and CEOs.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(4) Strongly disagree

**Please explain your answer:**

Increasing bills when you have been creaming off profits is a joke

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

Sort it out so no sewage flows into the sea where I bathe. It is a disgrace.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

I expect you to sort this out. It is your job.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

Everyone can see you are failing to provide and manage our water system. A consultation may look like a good public relations exercise. Most people are now aware and rightly angry, due to media attention and persistent pressure from small groups like Surfers Against Sewage. Hopefully you will be held to account for your disgraceful mismanagement.

**What do we need to improve in our DWMP?**

Don't make people prioritise eg choose between protecting nature and avoiding sewage in the sea. It makes absolutely no sense. Prioritising made me very disappointed, as you obviously don't see it ALL needs fixing.

ID 1011

Organisation

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

The lack of maintenance over the last few decades has created massive issues with leaks. I've had 28 texts regarding leaks in Seaford over the last 6 1/2 months.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Collaborating with other organisations would hopefully save time and money.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Condition and Groundwater Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Less rain going into the sewer system should mean less raw sewerage going into the sea and rivers.

We need a new approach to sorting an out of date and not fit for purpose sewer system. There's plenty of evidence that nature-based solutions are best in the long term.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

The water companies have under invested for decades and the whole system is not fit for purpose.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(4) Strongly disagree

**Please explain your answer:**

The drainage and wastewater risks should certainly be reduced but why should customers pay again? Customers have been paying for services that they don't receive for far too long. When I pay my bill, I expect to get the service that I pay for, but I certainly don't get that with Southern Water. I pay for the wastewater to be processed, yet I end up swimming in sea water full of raw sewage. I pay for maintenance of the current system, yet I have had 28 messages about leaks in Seaford. Some of which took over 6 months to get fixed, then we get a hosepipe ban due to water shortage.

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

Considering the amount of profit that Southern Water has taken in the last few decades, I don't think it goes far enough and I have noticed that Seaford isn't even mentioned even though there are very regular sewage dumps straight into the bathing water. The pipe doesn't even go out to sea, it is right by the beach.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(d) I do not support any of the policies

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(3) Disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

There is some good points but it doesn't go far enough or quick enough.

**What do we need to improve in our DWMP?**

Fix the leaks.



ID 1012

**Organisation**

Transition Town Lewes

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

Investing in infrastructure. Replacing old pipes, and treatment plants so that you STOP DISCHARGING into rivers and the sea. This is done with appalling regularity and in unacceptable quantities.

Pay your directors a fraction on the enormous salary they get now and invest in a better service for the sake of customers AND THE ENVIRONMENT

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Work with all water companies on Investment in new reservoirs. And

Repairs to all water & drainage pipes needed to avoid leaks & safe passage of water, rain water and sewage.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

If you protect and improve the environmental issues you will need to do all of the above - not separating it out into priorities. It all needs addressing if the environment is to survive for future generations.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

I don't trust private companies delivering anything other than fifer or & shareholder profits.

I think you work out the minimal cost and minimal risk and do the least you can possibly get away with!

ID 1013

**Organisation**

Sea swimmer

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

**What do you consider to be the most important future challenges?**

Fix your system so you are not dumping sewage in our rivers and seas.

Fix the leaks to stop wasting water

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

We should be protecting the environment and saving good water and not polluting the environment

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1014

**Organisation**

Resident

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

investment in the infrastructure to improve water saving and drainage, separate rainwater and sewage drainage, build more treatment plants, build more reservoirs, IMMEDIATELY address the loss of water through leaking pipes, IMMEDIATELY address the fouling of inland waterways and beaches with storm overflows.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(5) No opinion

**Please explain your answer:**

Southern water should take advice from other organisations but the responsibility to manage wastewater and drainage is the company's. Don't try and palm off your responsibilities onto other organisations.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

Yes obviously the risks should be reduced but not by loading the costs onto the customer. You make a shitload of money already. Funding for this should be made by the company. Stop paying your execs massive bonuses. Shareholders need to take the hit as well as the profits.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

Everything. You're taking the piss out of customers and have been for years. The level of anger at you is enormous. You need to act now. It seems even massive fines are not a deterrent to taking huge bonuses and dividends. Immediate investment in water conservation and stopping sewage dumps should be your priorities.

ID 1015

**Organisation**

Sea swimmer

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

Immediate investment in 'leaky pipes' and combined waste dumping of raw sewage -

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Ideally - I'd like Southern Water to have a complete pay freeze until they clean up their act and to collaborate with the government under threat of denationalisation if targets not met

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Water is too important to leave to companies driven by profit. How can we be asked to have hosepipe bans when billions of litres of water are being wasted daily through underinvestment in pipes

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(5) No opinion

**Please explain your answer:**

This sentence does not make sense. Like most of Southern Water's disgraceful policies

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

Again - risks should be reduced to not significant while bills increase - nonsense that should have been checked by the Plain English campaign before written.

**I support the range and type of investment needs identified in the five Investment Plans**

(4) Strongly disagree

**Please explain your answer:**

I support nationalisation of the waterways after abject failure by Southern Water

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Nothing. It's greenway. I don't believe a word Southern Water says.

**What do we need to improve in our DWMP?**

Stop paying your CEOs exorbitant salaries and they should be subject to incarceration for breaking the law time and again

ID 1016

**Organisation**

Private

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Dealing with heavy rains and flooding

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Creating synergies by sharing resources

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(5) No opinion

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(4) Strongly disagree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(1) Strongly agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1017

**Organisation**

Individual

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

Dumping of raw sewage into the sea and rivers and Southern Water's decision to prioritise profits and shareholders over the environment and the health of residents. Shameful lack of investment resulting in dumping of raw sewage which should have been solved years ago.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Lack of proper investment and short-sighted profit driven policies has led to the shameful dumping of raw sewage into our sea and rivers, resulting in environmental damage and diseases in children and adults.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Southern Water has - for years - polluted rivers and the sea rather than properly invest in long term solutions. You prefer to pay yourselves and your shareholders large dividends than invest our money in protecting our health and the environment. Shame on you all.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Perhaps you should consider the health of the planet and people rather than saving money in order to pay yourselves and shareholders. You are a disgrace of a company.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(4) Strongly disagree

**Please explain your answer:**

So your answer is to raise bills rather than decrease dividends paid to shareholders or your directors' salaries? Why am I surprised. As above, you are a disgrace of a company. Perhaps you would like to come with your families to our town and watch your children swimming in raw sewage?

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

I have absolutely no idea what you are talking about.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

As per my previous comments, you seem to plan to allow yourselves to continue polluting rivers and the sea, whilst protecting your salaries and shareholders. You have allowed this to continue for years, and it is an absolute disgrace. If the amount of money you've paid out to shareholders had been invested in proper systems, we'd have clean seas and rivers and a world class water system by now. Instead, you are not fit for purpose.

**What do we need to improve in our DWMP?**

Just about everything. You should - under no circumstances - be dumping raw sewage into the sea or rivers. You are a disgrace of a company.

ID 1018

**Organisation**

Member of public and customer

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Execution of the plan; the immense scale of the outcomes required; the timescale over which actions and investment must be undertaken; the ever-changing environment, both physical and political; the uncertainty of future needs and changing priorities; the ever-rising population and their increasing demands on the finite resource we have to share, and our inability to make do with less; the lack of understanding of the public as to their role in wastewater creation and management....and all that and more before we tackle the specific issues how we deal with drainage and wastewater.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Give the range of water users and the impact on our lives of wastewater no one can be immune and pretend it is not their responsibility AND duty to ensure proper and safe use of water and wastewater, and the chain of inter-connectivity of one person's actions on others. This has always been the case when the tanner upstream poured effluent into the stream that was the drink water for animals and people downstream, to illustrate the point.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Most "runoff" water is not harmful in the same way as sewage and needs a less intense and chemically harmful treatment process. It should be easier and less costly to "treat" than sewage. Plus, during storm events it creates the situation of sewage being flushed into the environment. If it were separate, this should not happen as sewage is created at generally predictable rates whereas runoff and storm waters are not. Therefore, keeping them separate infrastructure can be invested in that solves each separate and unique situation

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(5) No opinion

**Please explain your answer:**

it is difficult from reading the plan as to what the advantages/disadvantages of each option really are, not least in terms of decisive mitigation of short-term and longer terms risks. Spreading your investment across a wide range of risk may result in unsustainable mitigation; least cost may be "affordable" in the short term and result in specific issues being dealt with but at what longer term detriment from the other risks? Some sort of classification would be helpful to see how those choices are made and the consequence of not choosing alternatives.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

We cannot avoid risk in life. We have to be proportionate and what one person deems acceptable may not be to others. In my experience, reducing a risk to a negligible level is unachievable even if it is desirable. so you need also to have warning signals when something is reaching an unacceptable level. And of course, if we invest in one thing we are not necessarily investing in something else. You have to be clear about the choices to be made, including the cost, which for some people may be unacceptably high. We all want to have cake and to eat it!

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

Too technical and the Plan does not set out clearly what the choices and trade-offs are that "the public" can understand. For me, that is the failure of the Plan, which is not a very engaging document to read.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

It needs a well-written "Executive Summary" with key elements of what the strategy is and a summary of the findings are and how this will translate into a plan .

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It is highly technical and full of analysis which gives a good indication that the right people have had input into it but....see below

**What do we need to improve in our DWMP?**

1. The Plan has clearly required a lot of research and input from a lot of people, and it should therefore be credible that the people responsible for drainage and wastewater management have done their homework and know what they are talking about.

However, is turgid, with dense text and heavy use of words, full of technical detail, making it difficult to read and digest the substance of its content. This makes it unclear what the actual plan is, what specific issues have been identified and, more importantly, the actions that need to be (and will be) taken by SW or other parties to mitigate those risks.

That is not to say they are not in the Plan, but it is too difficult to navigate your way through it., and you do not get a sense of what you intend doing to take you from where you are now to where you want to be/need to be when you prepare the next 25 year plan, or at the end of your 25 year planning horizon.

2. The Plan does not seem to have been written with a broad intended audience in mind. It seems to have been written by highly (skilled) technical people for equally (skilled) technical people. Joe Public will barely pick it up and not bother to read it. Try to summarise and simplify and simplify, again always asking yourself: what point is it trying to convey and will it be understood by the intended audience. You can always put the technical stuff in appendices so the reader can dip into it to see what evidence underlies the statements being made.

3. Neither the Executive Summary nor the four-page summary reveal the issues and actions clearly. For instance, the four-page summary sets out principles and SW's obligations, and the fact it needs to work with others, but not a "plan of action" and does not summarise any from the main plan...except it does summarise the main Plan, which indicates the deficiency of the main Plan.

4. The plan sets out lots of analysis and broad issues and principles, but short on actual specific actions that will be taken to mitigate them. For instance, in respect of stopping release of sewage and flooding of homes, as stated in the Plan:

"We have asked ourselves and our partner organisations what the best solution to this problem is. Collectively, we have agreed that the best and most sustainable long-term solution is to separate rainwater from the wastewater sewerage system...".

Great on concept, poor on what this actually translates into by way of action, by whom and by when, and therefore difficult to assess who to hold accountable for its success, whether in fact it has been done, whether it was timely, whether it has resulted in the desired outcomes and has improved the world we live in.

5. Lots of statements about so many partners to work with but no statement about how that will be achieved, who will be responsible for what, the barriers to effective partnering and how SW influence (or cajoled) them into taking their actions.

6. Environment Agency (EA) is a key partner and has its own objectives and risks to assess. These may be in conflict with SW's objectives, but it does not state where this is the case and the proposed action on how to co-operate or have an

agreed approach. Nor does it demonstrate SW and EA will be in harmony with their plans.

7. There is clearly misunderstandings and misconceptions about what SW does and the constraints and challenges it has in the publics and its customers minds: it is seen as "the enemy" and not acting in the best interests of the general public, its customers and other stakeholders. The engagement these key stakeholders has clearly failed. What is the plan, therefore, to have better and more effective engagement, to change their minds, and importantly, to get them to work in co-operation with SW (and the EA) to achieve the standards we all seek?

8. The statement of the amount to be invested (some £2.6 billion) is less than convincing. It does not state the source of such investment, how it will be spent (capital assets such as infrastructure, R&D. implementation opex costs etc).

Given also that choices have to be made as there is not a "magic money tree" anywhere to hand, it is not clear why the choices made have been made, and what the consequences of not having chosen other options are.

And given the image SW has of squandering resources and lining the pockets of shareholders and executives (however true or fair or false that is) does you no great service. Be open and transparent about where the money comes from and the proportions to be spent on what, yes including shareholder returns and executives remuneration. That way you will get sensible scrutiny rather than emotive headlines.

9. References to past action and investment, whilst good for context, actually come across as a bit of a whimper ("we have tried hard in the past, really"). Given this is a plan and therefore should be about future actions, I really don't see the relevance, as the riposte will be "you should have done better, clearly". Again, think about what message you are trying to convey and position statements clearly to achieve that end, simply and effectively.

ID 1019

**Organisation**

Slot Machine Theatre

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

Re-nationalising your water company, or having proper oversight with much more power than Ofwat currently has, because your focus is profits, not the environment.

We might as well just all go and pass excrement directly on our local beaches, because that is in effect what you are doing to us with endless sewage being pumped into rivers and the sea.

None of us buy the excuses you give us when we can regularly smell human waste in the sea.

And you're asking the wrong questions: who, as a busy householder has the time to go through 50 page consultations? It's a method of keeping us out of decisions, whilst pumping excrement at us - quite literally - and then we demand to pay for your service.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

If this is a rigged question so that you can pass the buck to other organisations, then no.

You should take responsibility for the severe degradation of the environment that you are directly causing. But we all know that none of you care. If you did, you'd actually do something about it rather than sending out long and opaque documents.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(5) No opinion

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

"Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows."

This question is a complete con - and you must take us all for fools. We all know that you wait until there is rain as an excuse to get rid of sewage under the false pretence that it's due to storm conditions. This has only been happening since a tory government changed the law and made it easier for you to pollute.

You can tell how angry I am - but I also know that none of you give a flying fuck.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Again, a rigged question

JUST STOP PUMPING SHIT INTO THE RIVERS AND SEA

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Looking forward to paying more money for your crappy service, and filling in more of these nonsense forms

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(d) I do not support any of the policies

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(3) Disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

You need someone outside your own vested interests to be writing your strategic environmental assessment - an organisation like the marine conservation society. They'd write something credible. You have no credibility

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

You must have paid yourselves thousands to write it

**What do we need to improve in our DWMP?**

You all need to be sacked, and the company re-nationalised. Water is for everyone; it's not a cash cow for shareholders

You should all be ashamed of yourselves

ID 1020

**Organisation**

retired

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

River Ouse.

I keep my boat at Lewes and regularly go up and down the River Ouse both on a falling tide and rising tide. I having studied the tidal cycle for the past 20 years between :

- 1) Newhaven - Southease Bridge
- 2) Southease Bridge - Glynde Reach
- 3) Glynde Reach- Lewes
- 4) Lewes - Hamsey Weir

The river does not completely flush itself upstream of Glynde Reach. Any polluted water above Glynde Reach takes between 4 and 8 tides to reach the sea. (Springs or Neaps). If you do not believe me take water samples. Ask the EA to survey the riverbed heights (m AOD) and do then do the sums... $Q=AV$ . You have no choice but to improve discharges otherwise river users are at risk of serious infection.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

See above. Many years ago Lewes Rowing Club flagged up discharges from the Treatment works at Lewes NOT always being carried out on a falling tide. ie Raw sewage was visible coming upstream passed the Rowing Club and beneath Cliffe Bridge. You accepted then that changes needed to undertaken. However, the River is still dangerously polluted by semi treated discharges from Uckield through to Ringmer. You know the reasons why and Southern Water must take steps to improve the situation.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

You cannot in this day and age continue to allow sewage to enter the rivers and watercourses of our catchment area.

It must all be pumped to a coastal treatment works before being discharge offshore (preferably at least 3 miles out)

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Needs no explanation

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

Who posed these questions....what is your aim Southern Water...look after the people not the shareholders !

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

....ugh

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

Just think what your children and grandchildren would want you to do....and DO IT

**What do we need to improve in our DWMP?**

Isn't it obvious ?

ID 1021

**Organisation**

Resident

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

We must realise that our Victorian wastewater collection and treatment system can no longer be considered sustainable.

Complete redesign of this fundamental part of our basic infrastructure is long overdue.

We do not recognise the value of clean water, or that we need improved ways of dealing with human waste.

Storm discharges should be designed out of the system. Discharging wastewater into the environment should not be part of the process, let alone be a legal part of the process.

Specifically phosphate and nitrates should be recycled/reused, as should (pure) water and organic matter, not allowed to flow into the sea.

Wastewater treatment plant processes should be re-thought.

New WWT plants should not be located on the coast. It should not be necessary. Climate change/sea level rise will inundate some plants.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

One of the major threats to our environment results from housebuilding. SW has a legal responsibility to accept any new housing. It should be able to refuse, or work with local councils, the Environment Agency and other agencies to ensure that such housing is not permitted.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

see previous comments

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

The least cost solution is rarely the best value. The approach has to be best value for the long term.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

Wastewater treatment should be/is a highly regulated monopoly not suited to a private company where short term issues are important. The Government should play a part in managing the investment for the long term.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

While I support the proposals, I think the vision is limited by the framework within which SW has to operate.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

A very good document, helpful to non-industry non experts like me.

I recognise that the vision of the regional DWMP is likely to be limited. I just think we need some bigger thinking all round.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Very clearly set out - first class.

**What do we need to improve in our DWMP?**

See previous comments.

ID 1022

Organisation

NA

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

It's disgrace to discharge sewage into the sea as you did on the 16 August 2022 when still 1000 of families have been on the beach.

Holidaymakers staying in the UK and want to enjoy swimming in the sea are on high health risk to do this especially when the weather is nice as we had it for the last weeks

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

No explanation necessary

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

No further explanations

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

From my point of view the water companies had enough time and money to do all the now DWMP

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

Not enough

**What do we need to improve in our DWMP?**

To protect

ID 1023

**Organisation**

Homeowner and customer!

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

The discontinuation of dumping raw sewage into the sea along our coastline. As well as pollution and damage to public health, you are screwing our economy!

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The dumping of raw sewage into the sea at Seaford, and other popular visitor and swimmer locations along our coast is utterly outrageous and must stop immediately. You need to invest more in infrastructure and management to ensure the necessity to do this is stopped. Your organisation should be given ever more harsh penalties if you continue this practice; performance bonuses should be cut, and jail sentences handed down to senior management if this habit continues. You must be held accountable!

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**



ID 1024

**Organisation**

Private resident next to sewage works on Seaford

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Most important save our rivers and oceans from raw sewage pollution! Unbelievable what is happening in Seaford, we live right there at Cliff close opposite the sewage plant and can't believe what happened after that storm of Tuesday morning (16th august) I was out in the storm and smelt the sewage then saw the video posted by one of my neighbours... are you releasing this sewage when you think nobody will notice? In the middle of a storm? Or is it just complete ineptitude? Please make clean oceans and rivers your top priority immediately

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

Invest more money on infrastructure asap stop paying such ridiculous high salary and bonuses to shareholders and directors



ID 1025

**Organisation**

Owner

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

I cannot comprehend the degree of greed and the amount of ignorance required to discharge the amount of untreated sewage that Southern Water have been actively and insidiously discharging.

ALL our family have been sick, with our youngest suffering and outbreak of puss filled rashes, after swimming. Upon further research we noticed that raw sewage was being discharged directly next to us on Seaford Beach.

What has become of decency and public consideration? Are Southern Water so mindless that they do not realise ALL water is connected on this planet that they are so arduously attempting to suffocate?

Would senior board members of SW take a dip in the seas they are soiling? If not then why should we?

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

It is an actual travesty to say that Southern Water are concerned with environment protection! The only thing Southern Water are seemingly troubled by is their shareholders.

Disgusting

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

Southern Water is filthy and so are its practices.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Your number one priority should be the people and the environment. Nowhere should cost come into this. Why are you even asking us these questions when you have no intention of doing anything good for nature nor us.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

Still asking us these questions when infrastructure should have been in place already, it has been decades since the privatisation of our water. Southern Water have only one concern, profit!

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

My lord! All this talk of profit and expense. Where is the talk of improving the LIFE and environment of those that actually make your money, us. Instead, you all focus on profits for your shareholders and how to minimise any expenses. WAKE UP ALREADY! If you kill us off you will not make any more profit.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Southern Water is killing us and our environment.

**What do we need to improve in our DWMP?**

Southern Water should be nationalised.

ID 1026

**Organisation**

Private

**Are you happy to be contacted about your feedback?**

No

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

Investment in infrastructure.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Without collaboration the approach will be somewhat myopic and disrespectful to minor stakeholders.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Southern Water should be looking above and beyond pure compliance and not just completing the bare minimum.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Long-term shareholders will also benefit from longer-term planning. Return on investment should not be measured in years but at the very least in decades.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Customers will be fine with moderate increases as long as they can see tangible improvements and progress are being achieved.

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

More details are required. Plans need to be more specific.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(d) I do not support any of the policies

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(3) Disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

The definitions and parameters of words such as enhanced and quality have not been explained within the context of the report and are therefore arbitrary and meaningless.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

The DWMP is a comprehensive document, but does it really address the current and future issues of the needs of each area?

**What do we need to improve in our DWMP?**

Examples of plans and the expected effects and consequences of such plans in greater detail and explained in plain succinct language instead of terms which are hard to quantify.

**ID** 1027

**Organisation**  
Private householder.

**Are you happy to be contacted about your feedback?**  
No

**The main challenges for drainage and wastewater management are identified in the DWMP.**  
(2) Agree

**What do you consider to be the most important future challenges?**  
Deterioration of existing sewers and extra demand created by house building.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**  
(2) Agree

**Please explain your answer:**  
The solutions cannot be managed in isolation by any one group.

**The priorities for future investment should be: My number 1 priority is:**  
Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**  
Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Top priority must be drinking water and so need to avoid pollution of groundwater.

Rainwater should be diverted to reservoirs as it would need less treatment than wastewater and could be made available to the water supply side.

Nature based solutions could possibly be less costly than traditional methods.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Better value for money is preferable to the cheapest solution.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

If people have to pay more for sewerage, they might be motivated to pay attention to the message in the publicity campaign and not put the wrong items down the drain.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

It is all a bit complex and wordy for me. Plain English and the fewest possible words would be better.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It is good to have a plan, rather than muddling through.

**What do we need to improve in our DWMP?**

More practicality and less important-sounding language.

ID 1028

**Organisation**

resident

**Are you happy to be contacted about your feedback?**

No

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

The challenge and the responsibility lies with Southern Water to comply with regulations, to keep the public properly informed, to ensure that the company follows best practice to keep residents safe from sewage outflows, to invest adequately to provide clean water and dispose of "dirty" water and raw sewage safely and according to regulations.

Southern water is not meeting its obligations and its strategy does not provide a clear indication of how it proposes to do so.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

This is self-evident and requires no explanation.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

It is not clear what q 4-6 above are- except that again the answers should be self-evident. It goes without saying that Southern Water should adhere to all standards and regulations. This is a given. If only Southern Water did that effectively with adequate investment in infrastructure then all other boxes would be ticked

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

As already stated Southern Water needs to invest adequately to meet objectives and regulations.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Customers Bills won't need to increase if Southern Water invest rather than pay out too much in dividends or profits or wages at the senior end of the scale

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

Too much meaningless jargon and not enough action and investment is the problem.

Remember Actions speak louder than words

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

Best to be clearer in your use of language without too much nit picking which AHM muddies the waters considerably.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

I think you have used too many words to make it appear that you have a plan and are doing your best.

Common sense and the safety of the public and the environment should guide the decision making process.

What you discuss and propose is weasel words and overly complicated in order to suggest that Southern water will need to charge more to its customers.

In fact Southern Water needs to operate more effectively and to take all steps to comply with current regulations and to improve infrastructure ahead of time to meet incoming regulations.

**What do we need to improve in our DWMP?**

ID 1029

**Organisation**

Self employed

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

For Southern Water to try and put something back instead of just taking in the profits. Today, I heard on the radio that the discharge into the sea at SEAFORD was surface water due to the storms. We had just had some drizzle so where did all that surface water come from when you are also threatening hosepipe bans (on the same radio station the same day!). Learn to manage our water properly and make some investments instead of just hearing a potential weather warning and dumping waste into the sea.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Be good if some responsibility was taken.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Sounds a good plan but unsure how.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Southern Water should just invest - but that wasn't an option. Bit slipper to say "best value" - to whom? Your investors? Your Directors?

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Just reduce your profits. We are not gullible or stupid, and we won't forget.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

I don't feel I have a say.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

No point having a view.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

More investment by SOUTHERN WATER - not just putting prices up for your customers. You make too much profit.



ID 1030

**Organisation**

private individual representing our extended families living around Seaford

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Having just told all our friends how clean the sea is in Seaford Bay this year, and how busy the beach is with happy swimmers this summer, to hear this news about the recent discharge is depressing and outrageous. It is the first time it has rained for months! Two suggestions: How big is the holding tank at Seaford-can it be enlarged? How long is the outfall - can it be easily extended much further and to the east where beaches are inaccessible and deflecting this away from Seaford Bay?

Also what is the treatment capacity of the current pumping station. Maybe there should be a series of bacterial digesters well inland to where excessive storm flows can be rapidly pumped. Much of my professional life was spent photographing sewage treatment works in the UK from air and on ground. I never was asked to take Seaford, where we have all now come to reside.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The state of waste treatment in the south is still well below govt ideals. I think there should be at coastal towns especially, an attempt at least to separate rainwater and road run off from domestic and urban human and industrial waste.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Condition and Groundwater Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

If councils are to be forced to provide more housing all the above MUST be highest priority as a planning prerequisite above all else. The recently finished Newlands development will immediately aggravate the obvious shortcomings of Seaford WTW.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

I have not read it but am reacting in a personal and what to us is a dire situation!

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1031

**Organisation**

Seaford swimmer

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

Zero tolerance to raw sewage dumping in the sea. It rained for only 30 minutes in Seaford before surface water capacity could not cope. This is not acceptable

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Southern water need to urgently invest and prevent rainwater overflow

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Salaries of senior management should also be much more accountable

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Southern water are really not fit for purpose

**What do we need to improve in our DWMP?**

ID 1032

**Organisation**

Seaford resident

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

No opinion because I do not know what the DWMP is.

PLEASE STOP NOW pouring sewage into the sea and rivers, you should all be ashamed of yourselves.

REPAIR all the leaks and improve the system to make it more environmentally friendly and STOP wasting the money I pay you for water.

Again, your company is a disgrace.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The answer is obvious. Everyone should work together and put protecting the environment and providing a decent service first before benefiting its shareholders.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

The reasons are obvious, pollution has to stop and safeguarding the environment comes first

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

See previous answers

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

See previous answers

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

I do not know what these are

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Only agree if its priority is safeguarding the environment, repairing leaks, stop pumping sewage into the sea and rivers.

It's important to start now you all know what the problem is you just don't want to put it right because it will cost you and shareholders money!

**What do we need to improve in our DWMP?**

Everything

ID 1033

Organisation

Customer

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

**What do you consider to be the most important future challenges?**

The future arrived 20 years ago. Drafts are not required; urgent action is. Shift the company's centre of gravity from ever inflated remuneration for the highest paid and obscene dividends for shareholders to installing and maintaining adequate infrastructure and customer service. Water Research used to be one of this country's great gifts to the world: I suggest you retune your minds by sifting through some of the old journals.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1034

**Organisation**

University of Sussex

**Are you happy to be contacted about your feedback?**

No

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

halt the discharge of sewage into the sea or rivers

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

halt the discharge of sewage into the sea or rivers

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(3) Disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(4) Strongly disagree

**Please explain your answer:**

invest your excess profits back into infrastructure

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

invest your excess profits back into infrastructure

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1035

Organisation

n/a

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Building new reservoirs

Stopping leaks

Preventing storm overflows

Higher standards of sewage treatment

Install UV treatment at all wastewater plants

Separating waster from drainage

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Seems self-evident

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(3) Disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

The public is sick of perpetual illegal and 'legal' discharges of sewage into fresh water and the sea. Sewer flooding/condition and groundwater pollution are important but less evident. Obviously, years of under investment and cheating have resulted in the terrible state SW finds itself in.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

I am not quite sure what you mean here but best value sounds good. SW's investment programme is too small with unambitious targets. You need to make up for so many years of under investment that OFWAT let you get away with.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Suggest you cut dividends and executive salaries first.

**I support the range and type of investment needs identified in the five Investment Plans**

(4) Strongly disagree

**Please explain your answer:**

You are not trying to do enough now. You need to spend more money more quickly to correct all the things that are wrong with your systems as well as add extra capacity to cope with rising population. You are over-extracting and damaging our priceless chalk streams. Build more reservoirs and not energy intensive reverse osmosis plants.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(3) Disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

It is not ambitious enough.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Sets out a lot of what needs to be done but too slowly.

**What do we need to improve in our DWMP?**

You need to do more to improve water storage and treat all sewage effluent to the highest possible standards. All this needs to be done much more quickly.

ID 1036

**Organisation**

Tackle Bargains

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

More and more house being built with little or no opposition from SW

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

More and more house being built with little or no opposition from SW, as a statutory consultee SW should be proactive in opposing more concrete being laid and more houses being built.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

The ground acts like a sponge to soak up rainwater, when houses are being built and hard standing for cars is taken into account small wonder there is flooding following heavy rainfall as the sewers are overwhelmed by runoff.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

You can't cut costs as we all know that cutting costs leads to a poor job.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

You are in fact increasing risks by not strongly objecting to new housing.

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

it's just words, words and more words to show you are meeting targets.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

Not much

**What do we need to improve in our DWMP?**

Wastewater and drainage issues will only increase as more and more houses are built. SW needs to be strongly proactive in objecting to out of control new builds.

ID 1037

Organisation

N/A

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

I think you should demand a system that is future proof and fit for purpose, lots of benefits to rigid pipe systems but also drawbacks. Also stop using low quality plastic systems, demand a minimum standard of SN12 or SN16 to give the rigidity and also SDR34 rated fittings to avoid consistently going back to sewers and replacing/repairing them and causing disruption. Cheaper is never the best way forward, looking upward and demanding quality is surely the way to go.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

I think you should discuss with other water companies and manufacturers as to the best solution for them/you, look at what is on the horizon with BS9295 and it is pushing you in a better quality products direction

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(4) Strongly disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Quality has got to be the answer, and the current mindset of balancing ponds etc. is fine but you can never beat a robust, well installed system, with a good life expectancy

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(3) Disagree

**Please explain your answer:**

Quality at the forefront, not what is best value, do it right first time, there is no life cost savings if you have to go back every 5-10 years

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

I think most people agree to less disruption if the job is done right in the first instance

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

It is a necessity not a choice

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Addressed current and future requirements

**What do we need to improve in our DWMP?**

Emphasis on doing it right first time and minimizing customer disruption

ID 1038

**Organisation**

Private citizen / customer living in Arundel in the Arun & Western Streams Catchment

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

The reduction of CSO Spills in the Rivers Arun and Western Rother, all of which combine just south of Pulborough and then flow south to the sea at Littlehampton via the internationally important and legally protected SSSIs in Waltham Brooks, Pulborough Brooks and Amberley Wildbrooks.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

SW should also collaborate with its customers, especially the 200,000 in the Arun & Western Streams Catchment, all of whom are effectively disenfranchised by SW's restrictive consultation policy.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

I don't mind how you do it, as long as the solutions are both practical and cost effective.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

The DWMP is based on a set of self-imposed Planning Objectives which are not necessarily comprehensive.

For instance they do not include the Flooding Minister's statement in the Defra consultation document on Storm Overflows dated 31 March 2022, where she says:

"The targets we have set on storm overflow reductions aim to capture the main priority outcomes protecting the environment and protecting public health. We want to see our rivers restored, with more people being able to enjoy them".

At present SW's Planning Objectives do not take these requirements properly into account.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

We all have to grit our teeth and contribute accordingly - albeit that the programme will obviously take a number of years to complete.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(1) Strongly agree

**What did you like about our DWMP?**

It's a very good move in the right direction

**What do we need to improve in our DWMP?**

The distribution of your consultation exercise. Up to the present time there has been no SW Press Release giving information about it. There seem to be only 75 (undefined) addressees, and most of SW 2 million or so customers know nothing about it. The SW communication system is therefore flawed and the current PR policy needs to be re-thought.

You obviously do not enjoy the adverse publicity associated with the current high level of CSO spills, but you need to learn to live with it, and take advantage of the good news that rectification action has already started and that some "wins" have been - or are being - achieved in (for instance) AMP7. Stop hiding behind silence.

Also, whilst concentrating on generic solutions, do not be afraid to give details concerning specific sites.

ID 1039

Organisation

N/A

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

1. Ensuring all wastewater is appropriately treated and not allowed to overflow (or otherwise) enter the environment untreated. Invest the money avoided previously to ensure treatment capacity is appropriately sized and set reasonable, stretching targets rather than the current lackluster ones.
2. Create a viable plan for the supply of clean water to people that doesn't rely on the customer doing all the work. Invest appropriately in things like reservoirs and storage facilities, so that water can be safely captured during the winter (rainy) and therefore used during the summer (dry). There is plenty of rainfall coming down, even with climate change. You just need to get smarter in how it's used, stored and managed.
3. Stop the virtue signalling and become open and honest. Non-stop propaganda isn't fooling anyone and actually just makes Southern Water look worse. Emptying raw sewage into the sea when even a few drops of water fall from the sky is just insulting to your customers. Putting up social media posts claiming to be green whilst this raw sewage is still spilling into the environment is essentially slapping them across the face.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(4) Strongly disagree

**Please explain your answer:**

Southern Water claims to have changed, but there is no evidence of this. Propaganda to try and pretend to be green is non-stop, whilst things haven't really changed much from before. Targets set are pathetic and not stretching in any way. Reducing leakage by 50% by 2050 (a full 28 years away!) is simply not trying. Same for reductions in the sewage treatment arena. Southern Water shareholders have made a considerable amount of money in the past and not invested as they should, as the EA trial judge pointed out. Ian Macauley threw his entire workforce under the bus at the same trial, but claiming it wasn't deliberate policy, but incompetent and negligent staff. However, the judge made it clear, he didn't believe him in the slightest.

All these things together suggest Southern Water (as it currently exists) aren't fit to run a water company and therefore should have no need to collaborate with anyone in the provision of clean water or treatment of wastewater.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

Sorting my priorities 1-3 would have an enormous effect on my priority 4 without doing anything extra! 4 is largely a result of the others and doesn't need identifying separately.

Separating rainfall from foul water is clearly a good idea and should have been given far more importance and investment previously. The most appropriate solution should always be used and sometimes this might be traditional engineering and sometimes catchment wide or nature-based solutions. Prioritising one over the other makes no sense unless it's for propaganda purposes. Most appropriate solution to the task at hand.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Southern Water should be spending its money on things that will improve the situation in the long term rather than a short term effect that doesn't last. Also, money is currently being spent in areas which do not in any way improve the performance of Southern Water in the important areas of water provision and sewage treatment. This includes social media, which is largely a propaganda tool, trying to fool people into thinking Southern Water is a green and caring company. Not only does this not deliver for the customer, but it also doesn't fool anyone and is effectively money thrown away. Southern Water has also successfully managed to make it very difficult to contact them through anything but outsourced call centres, which have a very limited ability to do anything, except run of the mill, mundane tasks. Anything slightly different and you hit a brick wall. Bring them back in-house.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(4) Strongly disagree

**Please explain your answer:**

Drainage and wastewater risks should be reduced to Band 0, but at no expense to the customer. Given the excessive profits shareholders have taken over many previous years and the avoidance of investments, it is clearly the companies responsibility to make the necessarily investments from its own funds. How many times does the same piece of work appear in repeated AMPS, where promised investment in one hasn't been completed and thus it's been shifted to the next. Hint.....a lot. I've personally seen it!

**I support the range and type of investment needs identified in the five Investment Plans**

(4) Strongly disagree

**Please explain your answer:**

Southern Water has a long and glorious (sic) history of investing for the company and not the customer. Unless the company can recreate customer trust and become open and honest, I don't see how anyone can have faith in any of their investment plans. History shows us they are for the benefit of the company and shareholders only and nothing happening at the moment suggests any different. In fact, if anything, current evidence suggests it's getting worse.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(d) I do not support any of the policies

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(4) Strongly disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

It's difficult to take any environmental assessment created by Southern Water seriously. How can a company given the largest ever fine in the water industry for environment vandalism get trusted to make assessments around the environment? A company that has consistently put maximum shareholder return ahead of customers and the environment and doesn't appear to have learnt from the experience. If any report from Southern Water is to be taken seriously, it first needs to rehabilitate itself to its customers and others, which isn't happening. Claiming to have changed means little when there is no meaningful evidence of any change. This is especially true when Macquaries are now the largest shareholder, who have a very poor history in the water industry, including Thames Water and the breach of their agreement with OFWAT, resulting in massively increased debt levels and a hefty profit. Credibility is completely shot and nothing is happening to rebuild it. The judge in the EA trial made comments around these areas. Ian MacAulay has zero credibility when a trial judge made it clear he didn't believe what he said!

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

The approach is way too little, way too late and throws the costs onto the customer, when it should be funded by shareholders who have benefitted previously. If the shareholders are unwilling to shoulder the burden (having under-invested previously), the company should be collapsed and a new company formed who can deliver. No compensation or other value for the shareholders should be provided. I would far prefer an independent DWMP created by an organisation that has no monetary interest in the outcome and has some level of credibility.

**What do we need to improve in our DWMP?**

The word improve is a serious under-statement. The performance of Southern Water over many years now has been abysmal, with every opportunity used to push the impacts onto the customer. The DWMP needs to show investment and results financed by the company rather than the customer to make up for previous errors and under-investment. Targets must be much more stretching, results in mid-term improvements rather than throwing everything into the far future (e.g. 28 years' time). It looks more like a party manifesto than a viable plan. Promise a lot in the far future, which the current leadership knows they won't be around to be held accountable for. I'm sure the shareholders don't intend to be around to be held accountable either.

ID 1040

Organisation

N/A

**Are you happy to be contacted about your feedback?**

No

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1041

**Organisation**

Water user

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Increasing the capacity to treat wastewater to avoid discharge into water courses.

Dramatically reduce abstraction from rivers

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

They should not only monitor but be responsible for policing water use and discharge

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

The reason given for most discharges into the sea is that the current system cannot deal with increased flow during rain.

As our climate changes we will need to work with the changing landscape.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

So long as best value does not mean in order to maximise shareholder dividends

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

We all need to fund this.

Shareholders should also contribute via reduced dividends

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

There needs to be more state intervention and a reduced profit motive.

Basically water supply and treatment should be re-nationalised

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1042

**Organisation**  
Individual

**Are you happy to be contacted about your feedback?**  
No

**The main challenges for drainage and wastewater management are identified in the DWMP.**  
(2) Agree

**What do you consider to be the most important future challenges?**  
Stopping sewage running into the sea and rivers asap

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**  
(1) Strongly agree

**Please explain your answer:**  
Work together with environmental groups and try to get help from councils, government etc for funding to improve things as rapidly as possible.

**The priorities for future investment should be: My number 1 priority is:**  
Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**  
Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Fewer dividends to shareholders and lower executive salaries would free up money for long overdue improvements. Customers already pay high prices, much higher than I pay in France, where I live part of the year. Developers of new property should pay their share too.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

See above. Reduce top salaries and dividends.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

Too technical for me

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

The aims.

**What do we need to improve in our DWMP?**

Much quicker action to make up for past neglect.

ID 1043

**Organisation**

Individual

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

Lack of sewage capacity to meet Government house building plans. A plan to restrict new connections to the sewage network until there is an increase in capacity.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(4) Strongly disagree

**Please explain your answer:**

Local Councils including HBC have acknowledged that they do not have the ability to meet Government Housing targets. Southern Water should be supporting these Councils by not accepting new connections while there isn't sufficient capacity.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Sothern Water should also be taking action to stop the pollution situation from worsening. They should use realistic figures for household water usage and resist approvals for new house building.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(4) Strongly disagree

**Please explain your answer:**

The priority should be on environmental objectives not planning objectives.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

Southern Water profits and Government funding should be used to reduce wastewater risk.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

A national water network is the way to tackle water shortages. This requires Government backing.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

Aim to invest to reduce sewage pollution, improve monitoring, reduce storm overflows, improve the environment and tackle underinvestment in Southern Water assets in sewage plants, pumping stations and sewage pipe infrastructure,

**What do we need to improve in our DWMP?**

More studies on the impact of water pollution on the South Coast.

ID 1044

**Organisation**

Individual

**Are you happy to be contacted about your feedback?**

No

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

The lack of sewage capacity to meet Government house building targets is the most important challenge we face. The plan must be to restrict new connections to the sewage network until there is adequate capacity either by upgrading the existing wastewater treatment plants or by building additional capacity. New large housing developments must be put on hold until adequate capacity has been achieved. As it appears that the medium to long term aim for the Thornham wastewater treatment system is to separate parts of the sewer system from the surface water system and increase the capacity of Thornham WWTP by 2035, if that is what Southern Water are proposing there should be no additional large scale housing developments connected to Thornham until that has been achieved. Currently Southern Water appear to be making no objection to planning applications for large housing developments when they know full well that the capacity of their wastewater treatment systems are currently inadequate.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(4) Strongly disagree

**Please explain your answer:**

Local Councils including HBC have acknowledged that they do not have the ability to meet Government Housing targets. Southern Water should be supporting these Councils by not accepting new connections while there is insufficient capacity. Maybe then the Government will listen!!

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Southern Water should also be taking action to stop the pollution situation from worsening. They should use realistic figures for household water usage and resist approvals for new house building. Southern water should also be looking at the quantity of surface water that each house contributes to their sewer system and charging accordingly. For example, if a householder has paved over their garden, the water drained from that area will be adding to the quantity of raw sewage that needs to be discharged during heavy rainfall. The contributions from doing that should go towards paying to separate the sewer systems from the surface water systems.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(3) Disagree

**Please explain your answer:**

The priority should be on environmental objectives not planning objectives.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

Southern Water profits and Government funding should be used to reduce wastewater risk although some funding should come from those households that are contributing more surface water to the system by having paved over their gardens.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

A national water network is the way to tackle water shortages. This requires Government backing.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

The aim must be to invest to reduce sewage pollution, improve monitoring, reduce storm overflows, improve the environment and tackle underinvestment in Southern Water assets in sewage plants, pumping stations and sewage pipe infrastructure. No more housing development until the current system has been improved and is fit for purpose.

**What do we need to improve in our DWMP?**

More investment by Southern Water to reduce pollution on coastal areas and in rivers in the south of England.

ID 1045

**Organisation**

Public

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

Lack of sewage capacity to meet Government housing plans. Plans to restrict new connections to overwhelmed sewage network imposed until there is increased capacity

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(4) Strongly disagree

**Please explain your answer:**

HBC has acknowledged they cannot meet housing target. Southern Water should be supporting councils by not accepting new connections without sufficient capacity

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

SW should be taking action to stop pollution. They need to use realistic figures for household waste usage and resist pressure from developers

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

In the long-term Southern Water will get blamed for increased pollution caused by increased capacity and should resist developers who compromise them.

When held to account which they will be best value is better management long term than low cost

Priority should be environmental

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

SW profits and government funding should be used

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

Government backing, and a national system will be required to tackle water shortages

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

Looking at investment and reducing sewage pollution and questioning SW ability to cope with increasing volumes of pumping and sewage in the pipe infrastructure.

**What do we need to improve in our DWMP?**

More studies on the impact of water pollution and our lack of capacity with current system. Impact of more housing developments and what that will cause verses improved sewage treatment and disposal

ID 1046

**Organisation**

Manhope

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Creeping urbanization and population growth in areas that cannot reliably deal with current sewage levels.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Of course you should work with other organisations and one you should add to the list is the Attorney General to get the law changed so that you can be honest about your capabilities. This means that when you are asked (as a consultee) about your ability to deal with sewage from large new housing developments in areas such as the Manhood Peninsula, you are able to answer that you can't without contravening the Water Act.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

...but do not add to the existing load by building ever more houses in areas where you know the problem will be exacerbated

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Same arguments as previously explained,

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(4) Strongly disagree

**Please explain your answer:**

No just don't add to the load

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1047

Organisation

None

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

**What do you consider to be the most important future challenges?**

Firstly, by offering a consultation platform which actually provides user guidelines and the facility to enable them to return to the consultation question stage in process. I was almost to the end, had to look something up, only to find I had lost the connection entirely and forced to start all over again. I cannot find anything helpful in this regard, so I assume therefore this to be entirely intentional.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1048

Organisation

None

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Stop talking the walk and actually get on and start walking the talk. Go do!

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Does the question then mean you have not been collaborating past tense.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(4) Strongly disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Need to resolve and remedy the proximate causes and not seek to operate crediting pollution mechanisms.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(4) Strongly disagree

**Please explain your answer:**

It is not about reducing risks but eliminating the causes of the problem and any and all risk at whatever cost shared by the customer and shareholders.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

Firstly there must be a consensus as to what Band 0 means and especially a definition of what 'not significant' truly means.

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

I would need to review this area in more detail before commenting on this question.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(3) Disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

Lots of colour, lots of words but not particularly well put together. A lot of effort has undoubtedly been expended to create this document but whoever has missed the point over interdependencies. Capital investment in one direction actually benefits a dependent area of concern, but these seem to have been costed illogically separately. There is also a lot of 'we will do this and will do that' but the truth of the matter is this is what SW, DEFRA and OFWAT should have been doing over the last decade or so and certainly after the 2015-2017 prosecutions.

**What do we need to improve in our DWMP?**

See last question.

ID 1049

**Organisation**

Individual

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Deteriorating ability to control current pollution from sewage, and inadequate investment to increase capacity.

I believe that there should be no new development until the projects to improve water treatment capacity are at least started.

Investment plans are not yet taking accelerating climate change into account.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

The plans for additional investment need to be agreed in conjunction with the other organisations involved. Southern Water cannot do it alone. Government should be pressurised to return the Pollution Monitoring budget to the Environment Agency.

Havant Borough Council should be supported in trying to reduce the development objectives in recognition of the poor water quality performance in both Chichester and Langstone Harbours (which are of course linked).

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Condition and Groundwater Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Separating surface water from sewage is going to be difficult and take a long time and a lot of investment. This needs to be prioritised now and for the foreseeable future.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Separating surface water from sewage is a strategic priority as important as leak reduction.

The current serious problems cannot be resolved by short term least cost solutions. There is a need for a robust long-term plan that is progressed consistently.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

The financial structure of the water companies should be constrained by OfWat to reduce the proportion of profits that can be distributed to the shareholders. This is a massive investment requirement.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

See above

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It tackles some difficult and important issues. The priority is now to turn the plan into actions and investments.

**What do we need to improve in our DWMP?**

There is inadequate focus on the Chichester/Langstone Harbour complex. The wastewater performance here is demonstrably poor, but is not the focus of specific actions.

ID 1050

**Organisation**

Individual

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

1. Emsworth & Chichester Harbour are on the boundary between two areas East Hants/Havant BC and Arun/Chichester DC. The challenge is for your two authorities to work together and with the two planning authorities to ensure that solutions work across these boundaries.
2. Lack of capacity to cope with sewage and other types of water e.g. rain water.
3. The DWMP does a good job of looking at the issue overall and providing guidance for the future however, some major issues are obvious (e.g. capacity at Thornham Treatment Works) and a start needs to be made now. This document must not be used as an excuse for short term action.
4. Improving your monitoring of coastal and inland waters/rivers and making the figures public so that the public can see your progress.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Yes you need to collaborate. However, it is essential that you do more than that and positively intervene. For example, when there is a housing proposal that would feed into and already overloaded treatment works (e.g. Long Copse Lane Emsworth 210 houses into Thornham Treatment Works).

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Condition and Groundwater Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

However, short term investments that address pressure points should not be automatically discarded.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

The shareholders have been receiving a very generous return for a low-risk investment over a number of years it is now time for them to make their contribution with profits being invested into the business.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

However, now you have a good planning framework, even if it needs a final update and then formal approval it is time to start the short-term planning for projects that must be started in the very near future. This process must not be used as a mechanism that gives "permission" for planning for the near future.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It provides a good overview of the issues involved and a framework to understand the separate strands of activity.

**What do we need to improve in our DWMP?**

1. Make mention of the separate areas ensuring that they will work together as problems and issues will not respect your boundaries.
2. When considering Chichester (Thornham) and Langstone (Budds Farm) harbours it needs to be realised that these do physically link and the tide flows between the two.
3. I realise that this is a long-term planning document that sets the direction but I think there should be some indication of what the thoughts are for the next 5 years.

ID 1051

**Organisation**

Individual

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

My concern is a lack of sewage capacity to meet gov house building plans the sewage system simply won't be able to cope with the increase in housing.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(4) Strongly disagree

**Please explain your answer:**

HBC have admitted they don't have the capacity to meet the targets. Southern water should support council by not accepting new connections while there is sufficient capacity.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Southern water should stop the pollution situation from getting worse by being realistic about household water usage and resist approval for new house building.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(3) Disagree

**Please explain your answer:**

Environmental issues should take priority over constant planning objectives.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(4) Strongly disagree

**Please explain your answer:**

Southern waters huge profits alongside Gov funding should be used to reduce wastewater risk.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

Government backing is needed for a national water network to tackle water shortages.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Look to invest in reducing sewage pollution must improve monitoring to improve the environment. Underinvestment by Southern Water is a huge problem must improve plants, pumping stations and sewer pipe infrastructures.

**What do we need to improve in our DWMP?**

More investment (see Above) must improve plants, pumping stations and sewer pipe infrastructures. More transparency.

ID 1052

**Organisation**

Concerned resident of Emsworth

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

The draft plan is welcome as an initial starting point for public debate. It is comprehensive and professionally presented. However, due to its focus being long term, it suggests that short term urgent items are being over looked.

A primary challenge will be to convince people that the plan as stated will deliver on time and will result in serious improvements, for example, reduced nitrate levels in local sea water, less polluted water for leisure activities and committed efforts to prevent chemical pollution harming sea life.

No doubt all the activities listed will have a positive impact but it is far from clear when results begin to show before 2040.

Also, it is far from clear that the funding for the plan is sustainable. The Sustainable Bond Impact report issued by Southern Water in 2021 indicates that they will fund improvements for water supply and drainage via ESG investor purchase of sustainable Bonds. The report also sets an ambition of zero pollution by 2040 but does not specify how this ambition is defined.

This means that improvements can only proceed at a rate that Southern Water dictates and as investor funding allows.

The public view is that a crisis point on water supply and drainage pollution has already been reached and SW response is inadequate and have an expectation that both short term and longer term improvements and standards should be defined by external bodies such as DEFRA, the environment agency, local councils and agriculture industries. The response to such requirements from SW should be available for public debate.

Funding should be a separate debate when needs and timing is agreed.

Specific examples are:

1. Have agreements been agreed on the requirements for a future water treatment facility that will meet the ever changing needs for the 21st century across all affected parties and is there a mechanism for adjusting the requirements as plans change. HBC local plan for housing changes on a planned schedule. Examples are:

a) Ever growing capacity to meet government imposed housing targets, which is already insufficient to prevent local beach and sea water pollution.

b) increased volumes of rainwater due to the impact of climate change

c) inadequate extraction of chemical pollution arising from commercial use of chemicals as well as personal use of drugs and medicines.

d) new scientific information on sources of pollution to be extracted

2. A short-term solution must also be found to avert the existing water and pollution crisis.

An example is the limited capacity at Thornham WTW quoted as 170 houses. Development of over 200 houses in Emsworth will exceed the capacity, developers can proceed with no regard to the limitations, and it appears that SW has no ambition to prevent this addition to the present crisis.

3. Where is the additional water supply coming from?

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Since SW has no control over the quantities of water for treatment or demand for water supply, SW should prepare to negotiate an agreement with Government on how to prevent adding to the current crisis. The current NPPF requires urgent amendment since developers can proceed with developments that exceed the capacity of a WTWs.

If SW is serious about fulfilling its commitment to ESG principles, then SW should take responsibility to engage with government bodies to agree the standards and requirements they must meet and highlight the legislation required to ensure that polluters and water consumers meet their obligations. Examples are local councils, housing developers, agriculture businesses, and waste disposal. Co-ordination of all parties is essential for success. Collaboration is only part of obtaining enforceable agreements.

Using current licence agreements to allow rising pollution levels and damaging depletion of water sources is unacceptable.

The plan hints that agreements have already been reached with EA but They are not visible in the plan.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Condition and Groundwater Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

This question refers to a possible solution to deal with increasing rainfall which is likely to be unrealistic on a country wide basis. We should expect to hear innovative solutions that can realistically be implemented at reasonable cost and which will alleviate the current situation. The plan discusses some potential affordable ways forward but do not appear to be a major thrust for the plan.

Since there seems to be a shortage of processing capacity, e.g. Thornham WTWs all options need to be considered that improve the situation in the short and long term.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

**Please explain your answer:**

This question is unclear and may have some relevance once an implementation plan is correctly specified. If an answer is expected for this question, then there must be some indication of what the options are expected to achieve. It would be reasonable to assume that the overall objectives are for example to protect the environment and for example, to protect rivers such as chalk streams, reduce pollution in sea water to the required standard, to protect sea life from damaging chemicals.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

**Please explain your answer:**

This is a vague and imprecise question and at worst a leading question that should not be used in any conclusions.

Is the question asking if domestic consumers should pay, or should polluters pay the cost or should governments contribute in cases where their policies have allowed pollution or should governments be prepared to invest in environment protection?

Funding of improvements is an important question that needs serious discussion.

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

Of course, the investment plans are worthwhile but are they enough? A first impression of the plan is that much more investment money is required if even the rather relaxed schedules are to be met.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

it is a good start and leaves many important questions open for public debate

**What do we need to improve in our DWMP?**

At the moment the plan appears to be an ad hoc set of actions that are no way tied to an overall set of objectives.

The overall requirements for the plan should be set by outside bodies such as DEFRA and the EA etc and should not be simply a set of actions that SW think they might be able to do.

Short term actions to alleviate the current pollution crisis need to be included and SW should be prepared to defend restrictive actions even if they are unpopular with Government bodies. E.g. if there is not enough capacity at Thornham for the proposed housing growth, then say so quickly and robustly. Don't not exacerbate the current situation on pollution levels in Chichester Harbour.

ID 1053

**Organisation**

Hamsey resident

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

You obviously have a lot of work to do to repair the chronically depleted sewage infrastructure in the South as well as your public image. I was surprised when reading through the DWMP (I'm not a specialist on wastewater as you are - I'm just a local resident) that there didn't appear to be any attempt on your part to acknowledge both the potential pollution from old communal septic tank outflows into river systems in the South, or to be honest about your negligence in upgrading this infrastructure. When our parish council in Hamsey, East Sussex enquired (EIR reference 1230) about the status of the communal septic tank on the Ouse in Hamsey you responded by saying you had acquired a permit in 1986 that exempted you from the EA's General Binding Rules or from locating any flow monitors at the site. There has been concern from the local community for some time that the septic tank is not functioning properly - strong smells coming up from the river and anecdotal evidence that the EA has tested the river and fined you for contamination. We consider the General Binding Rules should be binding and that the communication we have had from you has been at best, opaque. We feel strongly that you should revisit all the communal septic tanks in the South, check the rivers for pollution levels and upgrade them to aerobic and anaerobic systems. We are planning to make common cause with other communities that find themselves in a similar situation and will begin testing the river ourselves unless you commit to a full review of the licences and responsibilities you hold to local communities for this kind of infrastructure. We have all paid our wastewater rates in the expectation that waste water would be properly dealt with and we ourselves would not be responsible for damaging our environment and river systems.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The relationship between privatised water companies and the Environmental Agency has completely broken down. The EA should be given the legal power to force water companies to comply with environmental law - and that law should be revised with stronger regulation built in. Fines on water companies should be punitive not puny.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Condition and Groundwater Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

4 to 6? As I've said, I'm not a wastewater engineer. The other comment I'd like to make at this point is that this is hardly a plan which acknowledges the views or needs of customers. If you really care about your relationship with the public you should show that you do and develop a culture of transparency and honesty.

In my opinion, lacking expert knowledge on the subject, we are in need of stringent regulatory policies governing water companies to ensure that the natural environment and the ecosystem that sustains us is not further destroyed by a corporate system that favours shareholders over people and the planet.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(5) No opinion

**Please explain your answer:**

Please see my main point

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

Please see my main point

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

Please see my main point

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(e) I don't know

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

Please see my main point

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

Please see my main point

**What do we need to improve in our DWMP?**

Please see my main point

ID 1054

**Organisation**

Southern Water Customer

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

The lack of adequate previous investment in the drainage and wastewater infrastructure and funding necessary future investment in the infrastructure to meet increased demand from population growth, housing development, seasonal increases in demand due to tourism and weather fluctuations (drought, storms and floods). In my opinion, the law should be changed to make dumping sewage in our rivers and seas illegal, as this practice is unacceptable for both environmental and public health reasons. The Drainage and Wastewater Management planning should seek to eliminate this practice. Such planning should also seek to separate drainage and wastewater capture.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

It is important that water authorities take into consideration the wider impact of their drainage and wastewater management practices. Expertise from other organisations in environmental, housing development planning, highways and agriculture can be used to enhance the value and effectiveness of this draft plan. I do not think that it should be limited to the organisations that have been included in your draft. I think that those organisations that contribute to the pollution of the drainage and wastewater should be included to establish ways that they can contribute to stopping the pollution before it even gets into the system. I heard of the consultation via word of mouth. I think that the public should have been informed of the consultation via their household bills and given the web link.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

I think that everyone is responsible for helping to solve the issues that the water industry is facing. For the long-term planning, catchment wide and nature based solutions involving are my preferred solutions. However, I feel that it will be necessary to use all methods available depending on the particular circumstances of the issues faced in any one area. For me, prevention of pollution and ensuring public health should be the key aims.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

In principle, I agree with the statement. However, I have concerns about how the decision of what constitutes best value options is made. In the plan it says, risk-based evidence led with involvement from external stakeholders and partner organisations which sounds reasonable. My preference is that any solution aims to prevent pollution and ensure public health not just meeting current legislation requirements.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

I agree in principle with this statement. However, capping of charges to customers on low income/in receipt of benefits may be necessary to prevent public health issues. A suitable time scale of investment would be needed to ensure that customer bills remain affordable.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

I agree that all of the 5 areas need investment.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(3) Disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

The strategic environmental assessment of the DWMP public consultation has not been publicised adequately in my opinion. I am aware that there are a significant number of designated sites within the catchment areas, and I am concerned about the impact on the environment and wildlife of any works that will be done. I urge that adequate surveys and assessments of environmental impact are carried out prior to any works being approved.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

I feel strongly that a long-term programme of investment is needed and approve of the long term approach. I think that it is important to involve other organisations and stakeholders and would like to see it continue throughout the planning and implementation.

**What do we need to improve in our DWMP?**

I think that the consultation should have been broader and that it should have been notified to all customers along with their bills with the web site link.

There is suggestion in the consultation of the costs increasing customer bills. I did not see any comments about the impact on shareholders and profits. I think that the investment programme should give an indication of how the funding would be achieved and any impact on profits/shareholders. I think that shareholders should also shoulder some of the burden of these costs.

ID 1055

Organisation Customer

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?** Uncertainty arising from "climate change", eg rainfall intensity figures that were outliers may become the norm. How do you intend to forecast such variables to ensure designs are better future proofed.  
Poor public understanding of drainage and wastewater networks and treatment, ignorance of the true cost of water.  
General ignorance of the public and industry/agriculture of the potential of wastewater as a valuable resource.  
Poor ministerial guidance and local council decisions arising from short term political pressure and fleeting press and media interest.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The drainage and wastewater problems are varied and manifold and not all are Southern Water's responsibility. It is not sensible, effective or efficient to manage one small part of the hydrology of an area in isolation. It is of concern that Southern Water has felt it necessary to ask such a question.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Pollution is a catchment wide problem arising from diffuse sources as well as from Southern Water's assets. If only part of the problem is analysed and assessed then how can a comprehensive solution be developed, costed and implemented. Some traditional engineering approaches rely on good statistical data to ensure solutions are adequate, with increased uncertainty in the data due to rapid change in climate and weather patterns the risk of poor or inadequate design increases or solutions are oversized with increased safety factors to build in resilience just in case. Not an efficient approach. Catchment wide solutions will help mitigate this risk.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

The least cost solutions approach invariably solve little more than one specific problem, thus requiring multiple interventions across treatment works, systems or catchments which are rarely coordinated and slow to deliver the full set of required outputs and outcomes.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

A blanket reduction of all risks to Band 0 is probably unaffordable and requiring of increases to customer bills well over their willingness or ability to pay.

Catchment wide approaches and collaborative solutions should be able to attract additional funding and ease the burden on customer bills but the blind pursuit of Band 0 for all risks at any cost is not logical.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

I support them as far they go. They are traditional in approach and technology and low risk.

I also believe that additional investment is required in demand management, water use efficiency, rainwater use and effluent recycling to improve efficiency in the water cycle and in overall cost. Effluent recycling can provide a revenue stream in contrast to the current state of affairs where it is dumped and often in very inconvenient locations. Perhaps this actually means I would like to see more of the strategies currently shown as Improve to be marked as Change.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Finally there is a document that collates all elements of the drainage and wastewater investment needs and provides clarity on the underlying approach and methods used in preparing the company plans for the networks and treatment works.

**What do we need to improve in our DWMP?**

Efficiency and effluent reuse are woefully under utilised as possible solutions and often ignored in options studies. It is not clear why this is the case. The company WRMP is equally unambitious in these areas even though reuse is effectively a cheap resource.

The benefits of separating out flows in combined sewers need to be better represented and not downplayed as they appear to be in this draft. Separated out surface runoff drainage flows are an even cheaper resource than treated effluent.

A collaborative effort to educate consumers and developers to provide the necessary infrastructure to allow the exploitation of these cheap resources is required and yet both WRMP and this DWMP are relatively quiet on the matter. Customer education is required on all fronts not just in areas of high incidents of blockages. Education is required on most aspects of wastewater management - failure to address the high level of ignorance of the customer base will maintain the taboo surrounding foul waste and hinder the introduction and acceptance of holistic solutions to water resource deficits and non-polluting wastewater systems and treatment works.

ID 1056

**Organisation**

private client

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

The overdevelopment of the Southdowns, particularly the area between Littlehampton, Angemring and Goring by Sea.

You quite rightly identify urban creep as a challenge. However, if this is not addressed at the planning stage, with local authorities granting permission without due concern for the water supply and wastewater removal, then your plan will be redundant within the next 2-5 years.

How do you propose to challenge the councils and builders? Builders are currently planning 600 new homes in North Angmering. Have they contacted you about a risk assessment? Likewise, in Ferring, A259 corridor. It goes on..

We have already seen in Kent and Thakeham the results of overdevelopment. We have seen massive flooding in North Angmering due to over development and insufficient wastewater removal. Huge flooding in Tarring, West Worthing due to insufficient drainage and storm water having nowhere to run off.

Please make sure that you talk to the local councils and have your concerns listened to.

We have to address this issue urgently.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Builders and water authority should carry out a joint risk assessment to look at the impact of building. The report should be published in full, without fear or favour.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(3) Disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Catchment and nature-based solutions cannot occur where urban sprawl is removing the means by which any water could be safely removed. You will incur huge costs to your business model when any attempts you make to create a natural solution will be impossible due to demand and to rainwater runoff from previously green areas.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

You will have to place objections to continued building in the areas I specified. Otherwise, any future planning you so will be redundant.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

if you place objections to more building on the grounds of unsustainability and urban creep, your costs will remain manageable. Without this, your costs will remain higher than would be expected, and you will be responsible for the wastewater in developments where, for instance, there is shared drainage of multiple properties.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

I agree that the needs of the system are paramount and that it needs constant upgrading. However, as previously stated, no plan you make can foresee the effects of building on the local environment. Your plans will permanently be in a state of flux. This uncertainty can do nothing to protect your shareholders from worrying about their investment.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

You must seek risk assessment on the effects of urban sprawl. This must be published on your main website page.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

I like the idea that you are aware of the effects of urban sprawl on the infrastructure and that it is a concern for you.

This has a huge impact on the quality of life for your customers, and in the case of flood risk, reduces the chances of any claims against Southern Water for damage caused by foreseeable events such as claims for property damage.

It is a clear report, but please put it on your main page so that more people can have voice their opinions.

**What do we need to improve in our DWMP?**

Have a clear reference and link to any risk assessments undertaken in collaboration with building firms. Southern Water need a clean reputation,

ID 1057

**Organisation**

None

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

The scandalous dumping of sewage in rivers and the ocean by water companies and the lack of regulation due to government cuts and cronyism.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Southern water are one of the worst offenders in polluting our environment and failing to invest in proper infrastructure. More than collaborate they should be heavily penalised, and shareholders should be forced to return dividends that should have been invested in infrastructure. Salaries of CEOs should be cut immediately and be based on results.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Everything should be a priority. The scandalous performance of the water companies must change immediately on all counts

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(3) Disagree

**Please explain your answer:**

Words, words, words. Enough of words. Take action right away to stop this awful pollution.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

But only if shareholder dividends stop and those who run the companies stop receiving ridiculous salaries that they are not earning.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

I support action as I have already outlined

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

Everything as I already said



ID 1058

Organisation

NA

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

SORT OUT YOUR SHIT. IT IS CRIMINAL TO DUMP RAW SEWAGE SO CARELESSLY INTO THE RIVERS AND OCEAN

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(5) No opinion

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 1059

**Organisation**

Private Consumer

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Southern Water actually sticking to their future plans. This company record on environmental pollution is appalling and criminally negligent. Shiny plans, promising better behavior in the future will not cut it. It is time to renationalise water companies to work for the good of the people, not shareholders. This will be the most important challenge when it comes to water supply and wastewater management in the future.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Southern Water should supply all evidence for their illegal wastewater dumping to legal authorities and should closely collaborate with them, building a case for denationalisation of water companies.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

The most effective action water companies can take to "enhance the environment" would be stopping to dump untreated sewage and wastewater into our rivers, streams and seas.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(4) Strongly disagree

**Please explain your answer:**

Southern water should not prioritise best value options. It should prioritise whatever is necessary to stop these appalling practices from happening. 100% of all profits and grants should be reinvested into our water network. There must be no dividends, payouts, or any other form of siphoning off profits to shareholders, board members or the executives of this company. You are managing a common good and human right, not a market resource.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

Once all action has been taken to fully eliminate the privatisation of profits and the socialisation of losses and costs, then yes, should it be necessary to increase bills, this could be considered a last resort.

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

Again, a shiny plan is not going to cut it. Actions speak louder than words and so far, your actions have not matched up your promises.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(d) I do not support any of the policies

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(4) Strongly disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

Southern Waters track record is appalling. Illegal dumping of untreated sewage and wastewater has been going on for too long. The renationalisation of water companies is overdue. We must not continue with the ongoing privatisation of profits and socialisation of investment costs and losses. Water company privatisation has failed. In a private economy, consumers would be able to choose their provider. We have no choice but to pick the only provider available in our region. If I could, I would definitely not choose an environmentally criminal company like Southern Water.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Nice ideas, no trust in your ability to actually deliver on any of it.

**What do we need to improve in our DWMP?**

Not being given carte blanche to continue destroying our waterways, rivers, streams and seas to the profit of your shareholders and at the expense of the public and environment.

## Section 2: Responses from Community Groups

ID 2001

**Organisation**

Arun Countryside Trust

**Are you happy to be contacted about your feedback?**

No

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

The main challenge is political. The Guardian today leads with the fact that Liz Truss cut funding for proper environmental protection when she was in charge of DEFRA.

You must stop letting sewage into rivers and onto beaches. You must stop water leaks. But this needs more money and isn't entirely your fault.

However paying your bosses enormous salaries and bonuses must stop until the situation is much improved.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

This is so obvious it should hardly need putting into a 'strategy'.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

it's not clear which are questions 4 to 6 above since the questions are not numbered. I have put first, second, third and fourth priorities since that is what you have asked for, but in reality all are equally important.

You have not mentioned re-use of water from rooves and other areas to save water. This is going to be very important in coming droughts caused by climate change.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

'Least cost' is a misleading term as the costs may be passed on to customers. The best solutions should be used whatever the cost, and less money should be spent on enormous bonuses, huge salaries etc.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

See answer to previous question.

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

All are equally important.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Not much. You must stop pumping out sewage into rivers and onto beaches as soon as possible. You must stop giving enormous bonuses and huge salaries until the situation is rectified. You must mend massive leaks in water pipes.

**What do we need to improve in our DWMP?**

See above.

ID 2002

**Organisation**

Lewes District branch, CPRE Sussex

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

Southern Water should actually do the job it is paid to do, which is to collect and treat our foul sewage, releasing only safe and non-polluting discharges into our rivers, lakes and seas. It must start with the acceptance and recognition that its present performance is (a) completely unacceptable and (b), according to the EA, declining. This recognition MUST be the starting point for the DWMP.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

There is obviously no benefit in silo thinking. Unfortunately, privatisation seems to have led to a focus on profit (and management bonuses) rather than essential public service delivery.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

Silly to ask for prioritisation of four essential SW duties, when it is ESSENTIAL that ALL FOUR are achieved reliably. However, there is little point in ensuring that the discharges from a WWTW are absolutely policy compliant if that same WWTW is releasing untreated sewage for much of the time, as far too many are, because they have inadequate capacity to deal with expected loads in ordinary wet weather. Many WWTW release untreated sewage every time we get ordinary rain and calling these "storm overflows" is ridiculous. Alarmingly such situations are quoted as "Low Concern" to Southern Water. They are of high concern to everyone else, and completely unacceptable, but do not even appear on your priorities list. There is absolutely nothing proposed here that will achieve the declared objective of reducing "storm overflows" by 80% by 2030. That cannot be considered a commitment, or even a reasonable aspiration. On these proposals it is just an unrealistic pipe dream.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(5) No opinion

**Please explain your answer:**

Does this question have any actual meaning?

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

This is a matter for Southern Water and its regulator. However, at the moment Southern Water is charging its customers heavily for a service it is not providing to an acceptable standard. Does Southern Water seriously think that under present economic services the government or the public will accept another utility demanding large increases in payment from its customers?

**I support the range and type of investment needs identified in the five Investment Plans**

(4) Strongly disagree

**Please explain your answer:**

They may well all be needed, but so are the changes needed to prevent "storm overflows" (except in the few actual storms). Our catchment area (Ouse & Adur) has several examples of appallingly dysfunctional WWTW and a polluting third world sewage system, yet hardly figures at all in your priorities list.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Not a lot. It is far too unambitious and will not deliver what a reasonable member of the public would consider minimum service standards, or reduce storm overflows by 80% by 2030.

The DWMP considers "planned growth". Is this based on the adopted Local Plans or on the outrageous housing targets imposed on your area by the "Standard Method" algorithm, which are very different, and far higher, so leading to unplanned growth? If Southern Water cannot deliver an acceptable level of service for the existing population, which it evidently cannot, it should be insisting loudly and publicly that additional growth must be restrained until such time as the infrastructure is available to cope with it.

**What do we need to improve in our DWMP?**

You need to create a sewer network that does the job.

You need WWTW with the capacity to meet the demands on them in all but the most extreme circumstances.

You need to protect the environment.

You need to be honest, with yourselves, with your regulators, with the government and with your customers about your actual performance and about your capacity to achieve it.

Honest recognition of your present appalling performance is a necessary first step to improvement. Do you think this is apparent in the draft DWMP?

ID 2003

**Organisation**

Chairman, Pulborough Neighbourhood Plan Steering Group

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

All sewerage treatment works discharge foul material, with far too great a frequency. Firmer targets need to be set at a higher level, and there should be financial penalties unless there are measurable targets and outcomes. Southern Water should publish, on their own website, data for all sewerage treatment works, showing all dates when foul material was discharged into the surrounding environment, and the quantity of material discharged. A year-on-year target of a 10% reduction in discharges should be made, and no executive bonuses or share dividends should be paid if these targets are not met. Leaks from water supply mains should be similarly treated - the number and volume of leaks is scandalously large.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

There has been a lack of investment in infrastructure, and a significant lack of funding for the environment agency to monitor the environment. This must be remedied asap. It would be a good start to agree to double the holding capacity at every sewerage treatment facility. Pipework infrastructure in both drainage and sewerage is very poorly understood or monitored, and this must change. Some pipelines are approaching 100 years old. The pipework needs to be mapped, and we need to know where pipeline is under stress (through sagging for example) or where leaks are developing. Collaboration between councils and Southern Water on a more frequent and active basis is essential.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(4) Strongly disagree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

The pipework in place is still largely unknown. I have been called by Southern Water contractors several times to show them where best to look for the pipes!

Rainwater is an essential component of the infrastructure to move solid material through the existing pipe network. WE have had one instance where water efficient loos have been fitted, but where the sewerage pipe slopes at too shallow an angle to transport solid waste during drier periods. A bad storm comes along, and the solid material moves downstream and blocks the pipes, and there is resultant backflow.

Nature based solutions may be a long-term approach, but for the here and now traditional methods will give a reliable solution.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(5) No opinion

**Please explain your answer:**

This statement is so bland it ceases to be meaningful. A few musts:-

- a) leaks from the supply main and pipe network are huge. These should be reduced to no more than 10% of the current levels within 10 years (in Denmark 5% has been achieved...)
- b) Discharges from all treatment works must be measured and reported as a matter of routine. Sewerage plant holding tanks must (at least) double in size. The aim here should be to totally prevent any discharge into the environment, unless the weather circumstances are extreme (like during a 25 year storm)
- c) All pipework should be monitored so that Southern Water knows where there are problems on a real time basis (this is done in the oil industry as a matter of routine, and the necessary technology exists),
- .d) Modelling for planning purposes should be done using real data (flow during the morning flush hour during a heavy rainstorm would be a good baseline)

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

This is essential, and yes, the customer should make a contribution. This should be balanced by executive bonuses being banned, and dividends being banned if appropriate targets are not met

**I support the range and type of investment needs identified in the five Investment Plans**

(4) Strongly disagree

**Please explain your answer:**

Plan is not general enough, makes insufficient commitments at the top level, and essentially moves straight to the periphery of the problem.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

Again, top level targets need to be set and met. failure to meet these should lead to some appropriate financial penalties.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Some, but by no means all, of the lower-level targets have been identified.

**What do we need to improve in our DWMP?**

There are no meaningful long-term targets

ID 2004

**Organisation**

Sidlesham Neighbourhood Plan Group

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Water cycle - water neutrality- water conservation - water quality, water security

Environmental protection - nitrate neutrality- protection of wetland habitats

Sea level rise - future of coastal communities and coastal habitats -realisation at both economic and political level of impacts

Overall climate change - extreme weather conditions - fully recognising the irreversible impacts currently occurring

A rethink of operation of water companies in an integrated approach to essential services - move away from private market and profit driven system to a people driven needs based network ( to include health, energy, transport and communications)

Essential new legislation that enables water industry to decline new development based on a published and independently qualified assessment.

Legislation that bans non dissolvable sanitary and cleansing items.

Compulsory oil and fat traps in all commercial premises and where practical other users. User education and effective regulation and enforcement.

Integrated approach water companies, EA , LLFA to issues of flooding , both surface water and ground water

Increased provision of storm / rainwater storage

New technological approaches to water treatment - recovery of energy and unstable materials -overall update to wastewater infrastructure especially WWTW but also concentration on the linking mains system.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Without an integrated approach there is -as is demonstrated by current practice - a lack of a coordinated and direct pathway to solve problems of drainage / water supply and to address the crucial issues that climate change is presenting.

There is a substantial body of local community knowledge and expertise eg through flood and land drainage groups - that is unfortunately ignored in many instances that could contribute to addressing issues- Integration of the work of agencies such as National Flood Forum (NFF) should be used.

A greater collaborative working relationship across funding bodies is needed and a move away from market dividend driven investment motives by part of the delivery body.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Environmental protection and the impacts that water treatment has is the ultimate measure of how effective the systems and networks have been in their operation - the ultimate measure.

Sewer flooding is disastrous to those that experience it and so often solutions are not evident and individuals are left with the possibility it will happen again.

The impacts on mental and physical health are not recognised and their long term impacts on NHS etc will escalate.

The move to Individual property level resilience is not understood by many and the realisation that a comprehensive 'solution' to problems is not financially or in hard /green engineering terms will not come along is again not comprehended.

The future impacts on whether a property is incurable / mortgageable will be increasing issues that will far exceed the work that initiative such as 'insurance re' can accommodate.

There is a need for building regs / construction methods to address the needs of designing proper resilience into building construction.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(3) Disagree

**Please explain your answer:**

The adoption of best value leaves many particularly rural areas in a non-investment scenario but it is often these areas that are the environmental and biodiversity crucial sites.

The EA's approach to cost benefit has illustrated the failure of this system. Often rural coastal areas with a lack of investment because of low numbers of properties protected have suffered sea inundation and biodiversity degrading completely undermining environmental priorities. SW following this same route will simply compound a very bad situation.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Residents and commercial property operators should be able to expect a level of wastewater / potable water and flood protection that they can normally live with.

The cost of provision of these services must however be in balance with their own budgets. If costs are excessive it means that the structure of those providing services needs addressing in terms of their overheads and where applicable the commercial nature of their business model - provision of monopoly services may in reality be inappropriate to an open market delivery system and state intervention may be required - people must be able to afford to live in the country.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

But- the time frames for their implementation are far too long - meant of the catchment-based proposals where in previous plans and not implemented - the process of AMP's currently on "7" extending to 2050 are not going to address the crucial problems of for instance WWTW storm water outflows that are happening now. How the predicted £20 billion costs mentioned in the plan can be financed should now be central to your planning and not just pushing the issue 'into the long grass' of future AMPs.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

The impacts of your infrastructure and future infrastructure requirements can /will have significant impacts on local environments especially in or adjacent to sensitive /protected environments.

Development that will be required to have an SEA will link to your systems and there is in terms of continuity and need for a continuous 'line' of assessment.

Currently, the SEA in the plan does not Adequately consider the viability and implement ability of the downstream systems that will connect to your infrastructure - unfortunately very little scrutiny is place on connecting infrastructure and a greater coordinated and enforced scrutiny of individual drainage and surface water plans for development is needed - often the cumulative impacts of development are not considered and then have system impacts

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

The plan did address and explore the issues, but the process of solutions was far too extended.

**What do we need to improve in our DWMP?**

The plan is daunting in terms of the amount of information it contains and issues are often repeated but under different headings.

The use of the catchment based breakdown goes some way to simplify the extent of information.

Big question - who is the plan aimed at - it meets the professional assessment but from my conversations with individuals outside the water industry/ conservation community they have unfortunately often given up with the document.

A user friendly adaptation of the plan would be good on the lines of what the DWMP means for your community might be useful.

ID 2005

**Organisation**

Manhood Peninsula Action Group

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Clear environmental outcome

Fully integrate impacts of climate change in all future plans

Stop sewage discharge

Upgrade infrastructure

Change law so that new development can be refused, if infrastructure inadequate

Stop leakage

Work effectively with the Lead Local Flood Authority - WSCC

Co-ordinated approach to the management of drainage - surface water and ground water

Work effectively with Environment Agency, DEFRA, with a coordinated approach

All data based on dry-flow data - this must be changed to include the implications of increased rainfall

New innovation in treatment of sewage and recovery of substances from sewage

Seek ban on wet wipes etc

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

This is critical. I am surprised this question needs to be asked. Doesn't this happen already?

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Enhancing the environment means sewage discharges stop, rainwater is separated from foul sewage and nature-based solutions are put in place

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(4) Strongly disagree

**Please explain your answer:**

Prioritising on the basis of a cost benefit analysis based on the number of properties protected is a negative, failing approach, especially in rural areas. This contradicts your main objective to protect the environment. Fundamentally, greater investment is required across the board, rather than cost-cutting.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Approaching water supply on a profit generating basis will result in meeting the needs of shareholders rather than that of the general public.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

The proposals are duplicated across the five plans, which gives a false impression of activity.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

This is crucial, there has to be an integrated structure for environmental impact. This would need to be implemented in law, so that it can be enforced.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Does identify some infrastructure needs (e.g. Western Streams)

**What do we need to improve in our DWMP?**

The timescales are completely unrealistic if we are to address the pressing needs of an inadequate sewage system.

The specific needs of the low-lying Manhood Peninsula are not addressed

Storm water storage is essential for the Manhood Peninsula

ID 2006

**Organisation**

Friends of the Westbrook and Stonebridge Pond,  
Faversham

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

The Friends of the Westbrook agree with the analysis of challenges with the following comments:

- We have concerns that monitoring (by the Environment Agency as well as Southern Water) in some parts of the borough is inadequate and as such the extent and severity of some issues (eg pollution of the network of chalk streams including the Westbrook and tidal estuaries across the borough) may be underestimated. For instance, in August 2021 the Westbrook suffered a direct pollution incident when following a heavy storm sewerage overflowed from the combined sewer, washed over the road and green space next to the stream and into the Westbrook itself. We would be grateful to know if this incident has been recorded as has contributed to the evidence base for the DWMP. In relation to this, FAVE.PWO1.15 for Flood Storage in the Sewer Network for Davington Hill is scheduled for the long term which seems too long a horizon for a current issue.
- Reading the Draft Regional DWMP (Investment Needs) and the five Investment Plans it is clear that funding the potential £20 billion cost to reduce risk to the lowest band (Band 0) is going to present significant challenges. This should be recognised in the list of challenges and a range of creative options for funding this more clearly set out. Funding should not always be sought solely from customer bills, but also from company profits and general taxation due to the wider economic, social and environmental benefits.
- Public understanding of the issue of water quality and water resources is growing and public confidence in water companies nationally, and Southern Water in particular, has been knocked, especially following the recent water crises (water outages on the Isle of Sheppey, pollution incidents across the North Kent coast and across the country, drought conditions across the UK). One important challenge going forward is to rebuild public trust through openness and transparency, including details on the responsibility of funding of urgent and essential improvements. Ofwat clearly also have a role to play in this.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

The Friends of the Westbrook and Stonebridge Pond agree that collaborative work is essential. The Summary Plan states: 'Working together means we will be able to plan improvement schemes together, share the costs and coordinate any works to cause less disruption for our communities.' Bearing in mind the £20billion price tag for the necessary improvements we would ask for clarity on what is meant by 'share the costs', bearing in mind that in the North Kent Catchment, and across north Kent generally, the Drivers for the Very Significant Risks are overwhelmingly Hydraulic and Operational (with some Customer and Unknown following of from those) ie a consequence of the poor condition and performance of Southern Water's own assets not being able to meet the increasing pressures of climate change and growth.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

The Draft Regional DWMP sets out how Southern Water intend to work with local councils and others on SUDS and other nature-based solutions. This is a worthy intention which we support, but detail on how this might be achieved needs to be fleshed out, particularly as this is planned for the short term. Retrofitting SUDS into existing urban areas such as Faversham will be challenging and more detail on how this might be achieved should be set out in due course.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Funding should not be sought solely from customer bills, but also from company profits as well as from general taxation due to the wider economic, social and environmental benefits.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

The Investment Plans set out the huge scale of the issues with the wastewater system in Southern Water's area. The Friends of the Westbrook and Stonebridge Pond have some concerns that Eastchurch and Teynham zones have not been carried forward at present because the level of concern is deemed LOW, despite the Proposed Investment Strategy for these areas being IMPROVE.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

Clearly the Draft Regional DWMP is the result of a lot of work and background research which is very welcome. The risks are clearly set out and the ambition is also welcome. However, it is also clear that the challenges are great and the paths to success are not necessarily clear and certainly not easy.

**What do we need to improve in our DWMP?**

To more clearly set out and propose some solutions to the challenge of financing the aspirations of the DWMP and to set out even more clearly, the consequences for the environment and society if these challenges are not met.

It was clear from the workshops that we attended during the preparation of the DWMP that some of the engineers working up options had not visited the North Kent catchment. More emphasis on local knowledge and local geography (eg the difficulties of retrofitting SUDS into existing urban centres) should be integrated into the next iteration of the DWMP.

The Regional DWMP is a very difficult set of documents to get to grips with and is technically challenging for non-experts to read. It could be laid out more clearly with chapter numbers and paragraph numbers which would make the document easier to navigate and reference.

The website is sometimes difficult to navigate – eg to find specific documents. We would recommend Southern Water consider one evidence page on the website which lays out all the different documents in one place.

In the Investment Tables it is not always clear where locations are. Eg Where is Church Lane? Is this Church Lane, Newington? A simple addition of town or village name by every road name/location reference would make the Investment Plans much clearer to read and easier to navigate.

A word version of the consultation questions should be made available to assist consultees prepare their responses.

ID 2007

**Organisation**

Surfers Against Sewage (Brighton Chapter)

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

- 1 reducing sewage discharges and road drains to rivers and sea
- 2 higher environmental standards and expectations
- 3 climate change
- 4 population growth

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Southern Water cannot be solely responsible- business, Council's, the public and the Government have to play a bigger part.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Condition and Groundwater Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(3) Disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

In the short term (up to 2030) , better use of existing infrastructure such as the Brighton stormwater tunnel should be prioritised, followed by better maintenance, better back up loans eg generators and then new storm tanks.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(4) Strongly disagree

**Please explain your answer:**

Your website for the Adur and Ouse only shows Investment Needs for Adur and Western Streams, not the Ouse catchment including Peacehaven (Brighton) so it is not possible to comment. You need to restart your consultation.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

Peacehaven (including Brighton and most of Hove):

Options Appraisal: disagree with Reasons for 'Wastewater Transfer for treatment elsewhere' as the frequent use of the Portobello CSO clearly indicates that the system is beyond capacity at times and damaging the quality of marine waters and potentially affecting designated and non-designated bathing waters.

Disagree with reasons for 'Mitigate impacts on receiving waters' as receiving waters are adversely affected. Investment Needs: object to the approach in the Investment Needs for the following reasons:

- the identified investment needs do not address the issue of the Portobello CSO being used after light or moderate rain.
- there is a need for the Peacehaven WTW (and associated infrastructure) consent to be reviewed by the EA given that frequent use of CSOs and that SW are unaware of its design parameters.
- there is a heavy emphasis on meeting future development needs, but there is clearly a historic lack of capacity based on underinvestment to meet current development. Southern Water should object to planning application for new development unless there is proven capacity in the system at time of development.
- the investment needs seem mainly aimed at reducing surface water flooding, not the discharge from CSOs. I recognise the two are related but there is no obvious 'cause and effect'
- the issue of road drainage Surface Water Outfalls at King Alfred and Hove Lagoon is not addressed
- they need to have telemetry on them, be redirected into the Stormwater Tunnel
- there is no recognition that the Stormwater Tunnel could perhaps be used more effectively to smooth out peaks in flow, before pumping to Peacehaven WWTW
- the approach to surface water treatment is very much an 'old school' hard infrastructure led one relying on storage tanks.

You should learn from the BHCC SCAPE project which has installed SuDS in Carden Avenue, Hollingbury and was proposing to do the same in Norton Road, Hove. (This omission is surprising given that Southern Water was involved in this project). Green/blue infrastructure should be used first to store surface water.

- there is no recognition that electrical failures cause Portobello CSO to be used - you need backup generators and functioning pumps.

Support improvements to Marine Drive.

Shoreham Options Appraisal: disagree for stated reasons for same reasons as Peacehaven. In addition

- water quality in the Adur estuary is poor (see SAS Water Quality Report 2021 and Adur DC's testing ) and there are more CSOs and the houseboats as well as agricultural runoff and wastewater coming down the river.

Investment Needs: Similar comments as above for Peacehaven, except substitute Aldrington Stormwater Tunnel being used to smooth out flows.

Support review of review of consent for Shoreham WTW.

**I support the range and type of investment needs identified in the five Investment Plans**

(4) Strongly disagree

**Please explain your answer:**

Your assessment of needs is fundamentally flawed because

- 1) it is based on reporting of storm discharges in a period (2017-19) when Southern Water has been penalised for lying about the number of discharges - your Baseline Risk and Vulnerability Assessment cannot be trusted
- 2) there Annualised Incident Average underestimates the number of stormwater discharges eg 64 from Portobello in 2021
- 3) Storm Overflow Performance (SOP) is flawed - it doesn't apply to discharges to tidal or marine waters, only freshwater
- 4) SOP population growth assumptions don't take account of additional future growth over natural growth of existing population ie in-migration.
- 5) SOP urban growth should include assumptions about increased growth from non- residential development eg car parks
- 6) SOP assumes wastewater treatment plants are maintained properly which is patently untrue from criticisms / fines by the Courts and OFGEM
- 7) Risk Based Catchment Screening (RBCS) is unrealistic because it refers to permitted number of spills where this may not be defined and/or is increasing because of climate change, urban creep or poor maintenance. (eg pumps fail in NHS at Marine Drive Brighton in 2021)
- 8) risks to Marine Conservation Zones and non- designated bathing waters are not considered.
- 9) Southern Water do not know the design parameters of its largest works (Peacehaven) so cannot set a realistic expectation of how likely storm discharges are (this info given by SW in response to EIR request. Portobello has been used 64 times in 2021.
- 10) Portobello/ Peacehaven should be Category 1 for action because it affects so many, discharges into a MCZ/SSSI and is underestimated on other sites.
- 11) the proposal is not radical enough - should aim to reduce raw sewage discharges into rivers and sea by 2030 and to divert polluted road drains from rivers and to the sea by the same date.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

- (c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

- (2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

There is no indication of how effective the Identified Needs will be in meeting SW's own (vague) target of a 80% reduction in stormwater discharges, never mind a more ambitious SAS-preferred target of 100% by 2030. Which measures will have the greatest impact first?

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

It recognises the stormwater issue and causes and need for action by multiple stakeholders.

**What do we need to improve in our DWMP?**

More realistic assumptions

More radical solutions to end sewage and road drainage outfalls being used

End Stormwater releases by 2030

Identify stronger actions for partners

ID 2008

**Organisation**

Bishops Waltham North Pond Conservation Group

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Separating rainwater and flood water from sewage systems. This is essential so that treatment plants are not overwhelmed resulting in untreated sewage being released into rivers or the sea. This will become more and more important over the next few years with climate change resulting in extremes of weather and many more flash floods.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Collaborating with other organisations should result in a better coordinated plan to deal with wastewater and sewage, to lessen the possibility of pollution.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Road drains and building gutters and drains need to be totally separated from sewers to minimise flooding of sewers. Engineering has an important role in this. There are other catchment wide and nature based solutions which can make a difference such as green spaces and soakaways in places liable to flash flooding. Also, the introduction of beavers at the top end of streams and rivers has been shown to reduce the flood water

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Issues cannot be resolved by always going for least cost options. Only taking a best value option will have the best long term resolution of problems

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

Customers cannot expect to have pollution problems resolved without contributing to the cost

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

If all of the areas are addressed then it is much more likely that a more comprehensive resolution to current problems will be achieved

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(1) Strongly agree

**What did you like about our DWMP?**

The challenges that you identified that you need to tackle to overcome existing wastewater & drainage problems: optimising assets, preventing blockages, separating rainwater and enhancing treatment, and with climate change the areas to focus on to help address these challenges

**What do we need to improve in our DWMP?**

I think it is quite comprehensive and cannot immediately identify any improvements

ID 2009

**Organisation**

South Coast Sirens

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

1. Climate change means you have to do the following:

Immediately un-couple CSO systems as your system is killing our coastal environment! Within a few years our coast will be under water so you need to start to plan for that, now.

- a) install systems and collect greywater on every building and use it to flush toilets, water plants, etc
- b) only process water needed for drinking. make sure all processing is green, environmental systems and sell the proceeds
- c) reduce salaries and bonuses and link them only to the 'greening' of our water system
- d) campaign to Govt for regulation regarding agricultural run-off into rivers.
- e) Increase reservoir capacity
- f) investigate de-salination from saltwater options

PR campaign to reduce usage- ie clothes need to be aired, not washed. At the moment the feeling is so bad against Southern water, your advertising only enrages the public. SW need to get people on side with a proper 'green' plan before you advertise.

Shareholders, not bill-payers will pay for the above- 40 years of profits without much investment is the issue here- NOT just that SW have not planned for population growth whatsoever!

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(4) Strongly disagree

**Please explain your answer:**

The EA and Ofgem are powerless, and SW have exploited that to your advantage.

You need to look to Europe and other countries where proper systems are in action or developed.

Environmental organisations are crucial for the success of your plan- working together will help SW go further, faster, BUT NOT AS A PR exercise!!!

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Explained already.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Already done so

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(4) Strongly disagree

**Please explain your answer:**

Shareholders have had a free ride for too long. We are sick of it. No upcharges are acceptable after 40 years of privatisation and profits! Are you joking? People are livid.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 2010

**Organisation**

Lower Waites Lane (Fairlight) Road Maintenance  
Association

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

To actually upgrade our wastewater system that is polluting our area.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(4) Strongly disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(4) Strongly disagree

**Please explain your answer:**

They are vague in the extreme and appear to be mainly a box ticking exercise.  
As this form fails to support uploading documents, possibly deliberately, I have submitted a document to your "Contacts" site <https://www.southernwater.co.uk/help-advice/contact-us>, so please refer to this message and my request for you to send me an email that I can respond to with further attachments.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

Please see my earlier comment about the inability to download supporting documents to this questionnaire.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Not a lot really. It's too vague and seems to set out to confuse.

**What do we need to improve in our DWMP?**

Everything. For example, nothing has been properly costed and the priorities seem to have been set without any contact with residents.

I await your email to allow me to submit my carefully considered documents.

## **Section 3: Responses from Councillors**

ID 3001

**Organisation**

Barcombe Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

Maintenance of river flow rates and the cleanliness of our inland waterways barely get a mention. While we agree that they are not the 'most' important they are significant and deserve attention. Some of our wildlife relies on clean regular river flows and the current levels of neglect of these matters are putting our wildlife at risk. Once lost some species will not recover. Some of the Southern water maintenance budget MUST be directed towards securing the future health of our rivers and streams.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Working in isolation, Southern will miss out on the 'softer' benefits that can be derived from working with the conservation and 'recreation' groups within its community that rely on the good health of our inland waterways. Currently, Southern Water are considered a 'Couldn't care less' organisation that only wants to pay homage to the regulators rather than try to improve its reputation within its own community. (don't your employees care?)

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Rainwater cannot be 'planned' for. Sewage from businesses and households can be estimated with some accuracy and the size of the treatment works built accordingly. Rainwater is unpredictable and puts good planning at risk and discredits it. Rainwater is harmless to the environment. It must be channelled away from populated areas and roads.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Budgets are limited and should be used wisely with the long-term view in mind.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

We cannot continue to ignore the 'real' cost of our water usage.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

I didn't fully understand the plans.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(e) I don't know

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

We believe an honest attempt was made to describe in 'layman's' terms the extreme challenges that you face when trying to balance the increase in demands made on your services but without incurring extra cost.

**What do we need to improve in our DWMP?**

There needs to be a simplified version for consideration by your customers which ignores the regulatory bias. The cost of delivery of water and treatment of sewage needs to be expressed in terms of money and impact to environment. Collaborating with conservation groups will help you with this.

ID 3002

**Organisation**

Fairlight Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Improving an out dated system that was built for a far smaller population than currently exists in the south east especially with visitor numbers increasing.

The fact that CSOs are routinely in operation is not acceptable in the 21st century our Victorian predecessors would be horrified that their systems are not being updated.

In Fairlight we have more than one property that has had to have a one way valve fitted to their foul water outlet to prevent sewerage entering their property.

We also have manhole covers emitting raw sewerage at times on high rainfall into people's gardens, these are family homes!

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

the management of wastewater does not stop at the treatment plant. the discharge from these is causing pollution in local streams and damage to the ecosystem. the high volumes is also causing erosion to the banks of these streams.

that is not even to mention the health hazard of having raw sewerage running down the road sat times of high rainfall

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

In Fairlight we have issues with cliff erosion caused by ground water so surface water needs to be removed in a combined sewer to protect homes near the cliff

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Planning only looks at whether the new builds can be connected not at whether the existing system is already overloaded. Also in filling of one or two houses do not individually need to show capacity, however the cumulative effect of this is significant

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

we are not paying our bills so we can wade through or swim in sewerage

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

it is an obvious statement what Fairlight needs is a sewerage system that does not distribute raw sewerage round parts of the village several times a year and causing damage to local infrastructure, eco systems, and enjoyment of the local environment

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

if the system is robust, the environment doesn't suffer.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

The plan is good but it needs to be implemented within a reasonable time scale the problems facing locals are happening now and the solution should not be delayed

**What do we need to improve in our DWMP?**

time scale!

ID 3003

**Organisation**

Westbourne Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Separating surface water from foul and combined systems. Making the water industry a statutory consultee when it comes to development planning. Achieving water and nutrient neutrality.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Without collaboration, it is doubtful whether the proposed improvements can be achieved.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

It would seem that the failure to separate rainwater from foul sewage systems is the cause of the unacceptable number of 'storm overflows'.

Traditional engineering approaches have largely failed.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

This is a no-brainer. When it comes to the protection of an environment, no expense should be spared.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

The reduction of risks must be prioritised, but the cost must be proportionate to people's ability to pay.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

In view of the storm discharges which have impacted so disastrously on beaches in the south of the country in the last week or so, I am not convinced that enough investment is foreseen.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

The acknowledgement that things need to change. The listing of 12 significant challenges, followed up with the statement: "We realise the scale of the challenges and recognise that a radical step change is needed to ensure we have the right level of investment now and into the future to provide resilient wastewater systems."

**What do we need to improve in our DWMP?**

The document is good but it the proof of the pudding is in the eating.

ID 3004

**Organisation**

West Sussex Councillor

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

Lack of sewage capacity to meet Government house building plans. Three out of ten CDC area sewage works were beyond EA Q90 DWF limits in 2021. Within five years, and before Ofwat AMP8 funding round starts in April 2025, it is likely that seven out of ten CDC area sewage works will be out of permitted sewage capacity which causes immediate concern for current residents in the area and restricts any new housing to around 30% of Government required levels. There are serious limitation that impact sewage processing capacity and local water quality in the system of waiting five years for Ofwat funding rounds before suitable sewage treatment works and pumping station upgrades. Lack of EA powers, undersourcing of staff and apparent lack of political will to restrict housing developers from overloading sewage capacity. The Government NPPF policy requires immediate overhaul as it enables developers to challenge Council refusal for planning permission due to sewage or water capacity for free, and does not include any self-employed income in its affordability criteria (17% in CDC area are self-employed) and all of the predicted future housing numbers are based on out of date 2014 data. Issue with the permitted amount of money given to shareholders by all water companies that could be used more effectively for sewage treatment improvements, the underinvestment of water companies in stopping sewage pipe infiltration in high water table areas like Chichester, climate change creating both much greater storm sewage overflows into local seas harbour and rivers and the lack of sufficient storage at SW sites, not enough onsite storm water storage and processing capacity to be able to use storm rains to be processed for valuable drinking water, missing instrumentation to check Phosphorus to ensure nutrient neutrality, lack of coherent joint planning with Councils to ensure sewage capacity can meet Local Plans 10-15 years ahead, lack of Government enactment and implementation of the Environment Act to prevent the 10 times increase in hours of Storm Sewage overflows in West Sussex 2017-2021, lack of Defra legal power to force the Government to put in place legislation to reduce storm sewage overflows by 90% to return them to 2017 levels by 2025, likely shortage of drinking water in the Chichester area by 2025, over-extraction of fresh water from local chalk streams and rivers, lack of new reservoirs to fulfil demand for fresh water or take over from chalk bed extraction in West Sussex.

As regards Thornham the 6 storm overflows within the system spilled 111 times over the last three years. The international importance of Chichester Harbour and the current nitrate levels in the harbour mean that storm overflows are contributing

to the risk and Southern Water needs further investment to prevent this, including a second onsite storm tank at Thornham or suitable storm water storage system. Another key concern is only 172 houses capacity at Thornham against CDC Local Plan capacity criteria that uses 500 litres per household and Q80 DWF against EA permit levels. There is also a key concern that Ofwat and others may rig the system by changing capacity standards to say any sewage works is within permit if it meets its DWF Q90 EA permit level 3 years out of the last five, rather than seeking immediate action if DWF Q90 flow passes the EA limit in any single year.

Regarding Bosham, the major risks are groundwater pollution, nutrients being passed into Chichester Harbour as well as any potential impact from SW works on bathing water quality and shellfish waters. Currently the UK has less than 20% of its seaside bathing waters classed as good quality versus over 80% across most of Europe's coast. The international importance of Chichester Harbour and the current nitrate levels in the harbour mean that storm overflows are contributing to the risk and Southern Water needs further investment to prevent this, including a second onsite storm tank at Bosham or suitable storm water storage system.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

SW needs to collaborate with local Councils, Government, Ofwat, the Environment Agency and Natural England to ensure we have a clean, sufficient water supply for the future that is not burdened by new housing overdevelopment and lack of sustainability and enforced environmental standards and Policies. SW needs to push the Government to enact legislation already in place to improve water quality, sewage processing, water neutrality, nutrient neutrality, environmental protection. SW should support increased fines for all organisations that breach environmental and health standards. Ofwat should promote investment in sewage, sewer and water processing by water companies but not pass those costs on to consumers.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(3) Disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

SW needs to do both. It has not invested enough over the last decades in sewage processing capacity, works upgrades and maintenance and ongoing sewage site and pumping station improvements. More water quality monitoring is required onsite and all SW works should test for both Nitrogen and Phosphorus before discharge into receiving waters. All works should monitor hours and volume of storm sewage overflows as well as the contents of the overflows in real time. Nature based approaches are good in addition, as long as they are fully reviewed by the relevant statutory agencies and approved by them before implementation. SW should work with technology partners to create a network of real-time monitoring buoys and other measurement systems in Chichester Harbour and receiving waters. SW should also work more closely with Councils to ensure that Highways drains are cleared and that any infrastructure issues or failures relating to SSOs are regularly reviewed and resolved before the key period of October to March when 90% of storm sewage overflows occur. SW should work with local Councils and the Met Office to assess the future impacts of climate change and also create public information programs so people are aware of the issues of water pollution, paving over driveways, their responsibilities for house to road sewer pipes and maintenance etc.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

This question is incorrectly worded as it is focused on planning objectives rather than environmental objectives which should be the over-riding concern. The job of SW and other water companies is to safeguard water quality and water processing for existing users to a standard acceptable by both statutory bodies and residents. Until this is achieved the priority to create additional capacity for new housing or other requirements must be secondary. Cost is actually irrelevant in terms of safeguarding water quality from harmful bacteria and chemical substances and nutrient neutral water processing, and all funds required should be spent to achieve this.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(4) Strongly disagree

**Please explain your answer:**

The principle is correct but, given all water company debts were written off by Government when they were privatised in the 1990s, they should restrict any shareholder dividends first to pay for all works required before any consideration of increasing customer bills. In addition, Government should provide investment and introduce enacted standards on storm sewage overflows on a pro-rata basis to help ensure that this is delivered to the satisfaction of Ofwat, the EA and residents

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

The five core Investment Plans to improve internal Sewer Flooding, Sewer Condition and Groundwater Pollution, reduce Storm Overflows, ensure compliance, reduce pollution and create plans to improve the Environment are all suitable. However, what is not adequately addresses is plans to conquer future water source limitations and water neutrality due to the increasing effects of climate change. More money needs to be spent on joint water company, government and Council sponsored public education programs to reduce water use across the board, which will in turn reduce sewage processing requirements

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Aim to invest to reduce sewage pollution, improve monitoring, reduce storm overflows, improve the environment, and tackle underinvestment in SW assets in sewage plants, pumping stations and sewage pipe infrastructure

**What do we need to improve in our DWMP?**

Lack of evidence for where the biggest issues and locations are for sewage pipe infiltration. A major study is required on the South Coast around Chichester to validate the calculations and assumptions used in working out sewage per household, sewage pipe condition (much of it around Chichester being Victorian), key sources of storm overflows and sewage pipe infiltration, with rapid resolution plans as required.

ID 3005

**Organisation**

Amberley Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

Separate rainwater drainage from foul water drainage at its root. Many homes, especially in areas of older housing, still have rainwater discharging into sewers which are designed to take foul water from homes. This needs to be addressed at a very local level (even individual households) to reduce the need for storm water sewage discharges into seas and rivers.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

This is self-evident. Water companies have been unable to adequately address these problems since privatisation. Other organisations, including environment action groups, have the ideas to contribute, but they seem to be ignored. The public perception is that water companies prioritise profit and dividends above investment in infrastructure, and by doing so exacerbate the problems. We know what's wrong, listen to those with the answers, even if you don't like what you hear!

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

These solutions would have the least environmental impact, and probably be faster and cheaper to implement.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

But there needs to be a compensating contribution towards the cost by reducing water company executive pay, dividends and profits. You have had years of privatisation to get this right, but have failed. Your commercial model is not conducive to addressing these issues effectively.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 3006

**Organisation**  
Hamsey Parish Council

**Are you happy to be contacted about your feedback?**  
Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**  
(2) Agree

**What do you consider to be the most important future challenges?**  
Stopping raw sewage being pumped into our rivers, countryside and sea

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**  
(1) Strongly agree

**Please explain your answer:**  
And let others decide what is an 'acceptable' amount of discharge

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

Whatever approach (nature based/trad engineering) is most effective overall, whilst taking into account built and natural environment

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Cost alone should not be the greatest consideration. Are you able to put a price on the natural environment/human and wildlife health in order to weigh up investment vs value.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

No bill increases should happen whilst SW and shareholders are turning a profit.

'Not significant' also should be quantified and reassessed.

"storm overflows" and their consequent pollution are (other than in really exceptional weather) NOT of "low concern" and are unacceptable to SW customers.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

Many of these questions should allow for multiple choice answers, eg

(a) Protecting the environment

(b) Protecting public health in designated bathing waters

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

Last q: Should they draw on SW reports, yes but not be led by them, as SW have shown themselves not to be trustworthy in their reporting.

To reiterate: "storm overflows" and their consequent pollution are (other than in really exceptional weather) NOT of "low concern" and are unacceptable to SW customers.

Do whatever it is (all of the above) that you need to do to invest in and prevent sewage being pumped into our waterways and countryside

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Necessary ideas, but it should not be choose a/b/c or d- you should be doing all of these things, prioritising all of these places- bathing waters AND environment everywhere, investing in all these areas. Nowhere is dispensable.

**What do we need to improve in our DWMP?**

"storm overflows" and their consequent pollution are (other than in really exceptional weather) NOT of "low concern" and are unacceptable to SW customers.

Do whatever it is (all of the above) that you need to do to invest in and prevent sewage being pumped into our waterways and countryside. It should not be choose a/b/c or d- you should be doing all of these things, prioritising all of these places- bathing waters AND environment everywhere, investing in all these areas. Nowhere is dispensable.

ID 3007

**Organisation**

Birdham Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

**What do you consider to be the most important future challenges?**

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Local wastewater has to be pumped to Sidlesham Sewage works. After rain many residents, especially in new properties get sewage backing up in toilets and showers. SW know there is a problem as they station a tanker near the pumping station in Pinks Lane. Why is the system not upgraded. The WW treatment works at Sidlesham is hardly above sea level, and with sea level rising and more frequent storms, sewage would overflow into Pagham Harbour, an RSPB site and from thence into the sea.

Please spend some of what we pay you upgrading the system.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(3) Disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

All these are important in upgrading the sewage system. We would rather you GOT ON WITH THE JOB rather than get us to fill in forms

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

just get on with improvements. We face another winter of sewage back ups and overflows into the sea. Cut executive salaries, cut shareholder pay outs, but use income do the job we have to pay you to do. We can't do this ourselves !!

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Use some of your profits before you come to users of the system for more cash. We have all paid in for years while it appeared Southern Water did the least they could get away with.

**I support the range and type of investment needs identified in the five Investment Plans**

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

I saw it as a scheme for time filling rather than getting on with sorting out the problems.

**What do we need to improve in our DWMP?**

ID 3008

Councillor

**Are you happy to be contacted about your feedback?**  
Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**  
(4) Strongly disagree

**What do you consider to be the most important future challenges?**

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**  
(1) Strongly agree

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**  
Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**  
Enhancing the Environment

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

Should add lower bonus payments and shareholder dividends

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

too little too late

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

plans to do something

**What do we need to improve in our DWMP?**

doing it quicker



ID 3009

**Organisation**

Chichester District Council Councillor

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(4) Strongly disagree

**What do you consider to be the most important future challenges?**

There is clear evidence that there are serious issues with the network across the Western Manhood Peninsula served by the Sidlesham WTW. Calculations and surcharging evidence clearly show the network does not have the capacity during wet weather conditions and the situation has been further worsened by the large number of new connections over the past 8 years. Clear examples of mitigation not being undertaken can be seen at the Northfields development in West Wittering where an attenuation tank was not installed even though it was a planning condition. At the 110+50 new homes development at Clappers Lane Bracklesham the planning condition required lengths of the network to be upgraded with larger diameter pipework, again not undertaken. Whenever rain is forecast tankers are strategically parked in this area to prevent overload at the pumping stations. In fact, photos already sent to SW, during rain spell schoolchildren have to wade through the raw sewage surcharging from the manholes.

I raise this as there appears to be no plan in any of the attached documents to address these issues.

I would like also to refer you to Southern Water DAP Summary Report 2016 Final draft which identified many issues in this catchment area.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Having attended presentation on the state of Chichester Harbour and the coastline from the harbour to Pagham Harbour the situation is very serious. Some 100,000 chemicals have been found in the harbour most of which have passed through the treatment plants and many of these chemicals have had a serious impact on the marine life. I recommend you study the CHASM reports.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(4) Strongly disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

The environment has been seriously compromised through lack of investment by SW as can be seen with Chichester District. It should be noted that the situation has further deteriorated by allow large scale developments where the network is already overstretched. This has mainly happened because the Statutory Authorities will not admit to a shortfall in their systems due to financial implications.

Up until the late 1980's it was normal practice to direct rainwater into the network to cleanse it. However, the costs to rectify this are prohibitive.

Many of the pollutants being discharged from the WTW's are man-made chemicals, some 100,000 being identified in Chichester Harbour, it is very unlikely that these can be 'deactivated' using nature based solutions.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

To date there is clear evidence that for many years there has been no investment to maintain the capacity of the network to meet the ever-growing demand. There is clear evidence that shows the situation in the Sidlesham catchment area needs urgent action and I cannot understand why it appears to be in Risk Band 1.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

However, your current assessment for Sidlesham network does not reflect the true situation. If you read Southern Water DAP Summary Report 2016 Final draft it is clear serious problems existed then. Also, in SW Sidlesham drainage-strategy-report the delivery of new housing assumptions did not reflect reality.

**I support the range and type of investment needs identified in the five Investment Plans**

(4) Strongly disagree

**Please explain your answer:**

The timescales are not addressing the true situation. In the document you state:

Examples may include:

- (a) If environmental or technical constraints are forecast to restrict new development from being connected to an existing wastewater system then plans can be made to transfer wastewater to an alternative site for treatment
- (b) If sea level rise places too greater risks to a coastal treatment works in, say, 20 years' time, then a decision may be needed within the next 10 years on whether to plan to relocate the treatment works away from the risk
- (c) If flooding and discharges from storm overflows in a community is forecast to be very significant risk in 2040, then do we incrementally build additional network storage to keep pace with growth and climate change, or invest in providing a new separate surface water system.

This is the situation now at Sidlesham. The site, ref LIDAR mapping, is between 0 and 2m AOD.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

Too little, too late. The Southern Water DAP Summary Report 2016 Final draft did a far better job in addressing the local problems.

**What do we need to improve in our DWMP?**

Yes, bring it in line with Southern Water DAP Summary Report 2016 Final draft

ID 3010

**Organisation**

Bosham Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Tightening environmental permits to the point where no untreated or partially treated sewage is permitted to be released. This will involve considerable investment by the company and may well lead to some government shareholding of the company or even the nationalisation of such a strategic environmental asset.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

It is clearly important that SW collaborate with other organisations indeed, it would be preferable if SW were subordinate to government so that there was more power to regulate SW to maintain and invest.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

There are five main areas being considered on page 22 but only four areas to vote on in your questionnaire.

If you stop sewer flooding and improve sewer condition then you will have improved the pollution situation and enhanced the environment

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

This is a blinding glimpse of the obvious. Of course, we want the most effective wastewater treatment that is possible. Margins should be minimised to ensure the maximum investment by the company for the benefit of the population.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

But SW must be subject to overview to ensure that our money is being properly and efficiently spent and this will need a government watchdog with some proper teeth.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 3011

**Organisation**

Barcombe Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

To stop raw sewage being dumped into our precious sea and rivers

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Any collaboration with other organisations to prevent raw sewage being pumped into the sea and rivers will be a good thing

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

As explained briefly above, priority should be given to reducing the pumping of raw sewage into the sea and rivers

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Profits need to be reduced to provide more funding for all the requirements of the business to be met

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

Profits and shareholder dividends need to be reduced

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 3012

**Organisation**

East Chiltington Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

Separating rainwater drains from sewage drains. The rainwater should be reserved in reservoirs and the sewage treatment works would not be overwhelmed each time it rains

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Water companies should be consulted as part of the planning process

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Condition and Groundwater Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Just build adequate infrastructure to cope.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Years of neglect in the infrastructure has to be faced sooner or later. It's going to be costly to improve. We are all going to pay and that includes the water companies themselves.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Your draft plan doesn't seem to address the abhorrent nature of your actions each time you fail to fulfill your duty by polluting the waterways.

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

It does not go far enough. Low concern to you is definitely high concern to residents.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(3) Disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

You need to do more and sooner. We are going to endure this situation for years if your plan is followed through.

ID 3013

**Organisation**

Storrington and Sullington Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Clarification is required on pg 11 point 3 - Why are you only using the best available technology to achieve compliance at some of the- 24% sites that have challenging targets? what about the others and what about the other 76%?

There are issues with monitoring of bathing water quality as you only record pollutants that are persistent enough to exist when they reach the monitoring point, not at their discharge location.

Work should have started years ago to repair your sewer network but welcome the acknowledgement that this must be planned for now.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Why are you waiting for the Environment Agency to tighten environmental permits? you should all be working together now to protect the environment. Southern Water needs to work with Local Planning Authorities to robustly assess all planning applications and how they will impact upon water usage rather than just waving the development through and dealing with the stretched resources later.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Once again we would urge Southern Water to work with Planning Authorities to implement standards and regulations on development, road building, urban design etc. to safely deal with run-off

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

This work is welcomed but significant investment is well overdue and should have been earlier. Climate Change is not new. Previous comments regarding the need to object to Planning Applications if resources are stretched apply here.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

Not sure how Southern Water can even ask this question based in light of previous profits announced. Customers should not have to fund investment in wastewater systems which should have been budgeted for years ago.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

But not at a cost to customers

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

This consultation has not been widely publicised and a less detailed DWMP should be shared with your customers to inform them of your future plans to deal with all waste water management issues. Particularly in light of recent news reports of unacceptable numbers of discharges into our waterways and coastal waters.

Southern Water should also publish details and timescales to your customers for dealing with leaks from your pipes.

For transparency and to restore confidence amongst customers and other interested parties, Southern Water should include an undertaking that regular reports on progress to deliver the plan will be made public.

ID 3014

**Organisation**

Newick Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Climate Change

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

It is easier to find solutions that meet a variety of goals when working in partnership.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

I believe that it is difficult to education, influence and change people's behaviours if there are areas within the system which are out of their control and can therefore criticise the water company. Therefore, both sewer condition and ground water pollution and sewer flooding have to be a priority, so that when looking at compliance issues there is no come back. If all of the above are prioritised, then environmental enhancement will follow.

Question 5 - it is the most sustainable solution.

Question 6 - Climate Change and resilience measures as well as overall sustainability means we need to look at a whole picture i.e., the catchment and nature-based solutions, as opposed to just fixing one thing that may cause a issue further along the system.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

It is better to do a job right first time, than have to go back over and over again. With Climate change the best value option will need to reduce the risks across many planning objectives, otherwise it will cause more economic cost in the future.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

My answer to this question is a personal one and cannot be taken as a Newick Parish Council supported answer.

I believe that we must invest even if that means customer bills increasing, because the risks of do nothing is no longer an option. We must have investment that enhances and prepares for the future.

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

The Investment Plans are very comprehensive.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

By stating that Climate factors as just one of the SEA considerations misses the point that not only is Climate change one of the most complex issues facing us today, involving many dimensions but Climate change is a threat to everyone's physical health, mental health, air, water, food and shelter. I don't understand why on page 10 of the DWMP Climate Change is given as the top challenge, and yet in the SEA it is given as one consideration.

Climate change (or Factors) will have an impact on all the other consideration detailed in the SEA, Biodiversity Flora and Fauna, Soil and Geology, Cultural Heritage, Water, Air, Landscape, Population, Communities and Heath, and Material Assets.

Therefore, the SEA should be putting Climate Change at the forefront of any methodology. Climate change has never been just an environmental issue. It affects the economy, landscape, biodiversity, health and living standards too. There can be no trade-off between tackling climate change and building a resilient wastewater system based on adaption and mitigation.

The current methodology is difficult to disagree with, but I feel will inevitability end in a form of greenwashing where a tick box to show that economic and social desires (needs) outweigh those the environmental ones thus appearing socially responsible but continuing to operate as always.

A methodology that shows how each consideration can make the system more resilient to Climate Change, or the appropriate adaptation or mitigation would be more suitable.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It is well written, mostly easy to understand (although I took a while to get my head round the Band '0' information and very comprehensive.

**What do we need to improve in our DWMP?**

Where is the grey water recycling? I am assuming ti is not included as it is a supply area as opposed to a wastewater issue. If we improved our use of grey water recycling for toilets flushing, car washing etc etc, surely this would have an impact on the amount of wastewater?

ID 3015

**Organisation**

Earnley Parish Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

To finance major investment in order to manage climate change and to eliminate pollution of the environment, at the same time as preventing sewer flooding and associated public health issues.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Clearly SW has to work with central and local government and important statutory bodies, such as the Environment Agency and Natural England, if only to exchange information and co-ordinate plans. However, this should not be at the expense of ducking responsibility for the major investment needed to significantly improve sewerage infrastructure. Many of the 14 planning objectives listed on page 14 of the DWMP are solely the responsibility of Southern Water: for example, PO1, PO3, PO4, PO6 and PO8 It must also collaborate and consult with health authorities where appropriate, such as the UK Health Security Agency and the National Institute for Biological Standards and Control.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(4) Strongly disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Upgrading infrastructure (traditional engineering solutions) so as to prevent surface water ingress and therefore sewer flooding is fundamental and other priorities, to a large extent, depend upon it. This should be complemented by wider catchment-based approaches. We placed “enhancing the environment” (priority 4) last because the achievement of other investment priorities will mean that SW stop damaging the environment.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

A price has to be paid to significantly reduce damage to the environment and public health. Least cost is not an option.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

There may be other means of financing the much-needed investment. In addition, customer education to reduce water usage and blockages is important.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

Agreed, but the investments plans need to be more wide-ranging and comprehensive. A section of sewerage in our parish (including a pumping station) has been subject to hydraulic overload for some years and has caused great distress to residents, yet it is not included in the investment plans.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

No comments

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(4) Strongly disagree

**What did you like about our DWMP?**

The DWMP is comprehensive and clearly identifies many of the key issues.

**What do we need to improve in our DWMP?**

The DWMP needs to be far more radical in its approach. After examining all the issues, it seems inexplicable that the DWMP should conclude with the proposed overall core investment strategy of “Maintain”, a strategy the table on page 65 describes as: “Current performance is within acceptable limits and no major concerns for the future”. On page 12 of the DWMP you say “we have to change”. Clearly the overall adopted strategy should be to “Improve”, recognising that current performance is unacceptable. Southern Water needs to recognise that this radical improvement in its performance comes at a cost. On page 10 of the DWMP it is stated that: “Wastewater services are an essential service, so they need to be affordable, to protect and enhance the environment, to support tourism and enable economic growth.” This may not be possible. To achieve major improvements, it may be that bills have to increase significantly (or other funding secured), and that SW start raising serious objections to some major planning applications for new housing. To be effective, the latter action may require changes to the 1991 Water Industry Act, but Southern Water in concert with other water companies and interested parties could lobby for this.

ID 3016

**Organisation**

Lewes resident and Town and County Councillor (ESCC)

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

Climate change; Increasing non-porous surfaces including road-building and house-building; Numbers of new developments.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Southern water shows utter disregard for organisations that are desperately trying to maintain biodiversity in our rivers, lakes and seas, and those seeking to preserve human health. In addition to working with statutory authorities, SW must work with groups like Surfers Against Sewage, Greenpeace and the Wildlife Trusts.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

We have a lot of over-engineered drainage, but also not enough of it. Without scaling back on building (including roads to developments), our poorly invested-in existing drainage will be increasingly overwhelmed.

We need to ensure properties (whether businesses or homes) have some water resilience in the form of decent grey water recycling and water-butt collection for rainwater for gardens.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

This should be about how SW invests in its facilities, not about how to charge customers more. When the leaks are fixed and the sewage stops being dumped into the sea and rivers every time there's a bit of rain, THEN shareholders should be taking profits and CEOs might be entitled to a raise. Until then, it's stealing from the commons.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(3) Disagree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

Water needs to be renationalised. SW and other companies have shown repeatedly they are not to be trusted with the nation's water.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

Not much. It's a lot of green-wash and business as usual.

**What do we need to improve in our DWMP?**

Stop paying shareholders. Stop paying huge salaries to CEOs. Renationalise.



## Section 4: Responses from partner organisations

ID 4001

Organisation Wealden District Council

Are you happy to be contacted about your feedback? Yes

The main challenges for drainage and wastewater management are identified in the DWMP.

(2) Agree

What do you consider to be the most important future challenges?

While Wealden District Council (WDC) is in agreement with the 12 significant challenges identified within the draft Drainage and Wastewater Management Plan (DWMP), it is of concern that the level of housing development proposed through the current planning system under the National Planning Policy Framework (NPPF) (July, 2021) does not appear to have been identified sufficiently. Instead, projected population growth expectations (via Experian) and extant planning permissions are used to inform the main modelling work for the report. The 'Standard Methodology' under paragraph 61 of the NPPF identifies the approach that all local planning authorities (LPAs) should take with regards to calculating their need for new homes over their respective Plan periods. At the current time for Wealden District Council, this equates to 1,212 dwellings per annum (dpa), albeit that each LPA can consider a lower housing delivery target in its emerging Local Plan, if there are areas or assets of particular importance that provide strong reasons for restricting the overall scale, type or distribution. Even with this in mind, it is considered by WDC that the level of housing need for each local authority in Southeast England should also be carefully considered, alongside population growth and extant planning permission, in order to genuinely consider the cumulative impact this will have on existing water/wastewater infrastructure. There is a concern that if only population projections and extant planning permissions are used, this will understate the levels of growth across the region in the longer term.

It is noted that in the 'Population Growth and Urban Creep Technical Summary' accompanying the draft DWMP, only Experian population forecast data and extant planning permissions that are likely to be implemented are used to project housing development in any given area. Whilst it is acknowledged that Southern Water needs to have some level of certainty over where and when growth and development is going to come forward and are therefore unable to formally use data from emerging Local Plans, this approach is still likely to be underestimating growth and development. WDC would welcome continued partnership working with Southern Water around planned growth and population increases coming from work on our emerging Local Plan to ensure the right infrastructure and connections can be made.

WDC also agree that it is important that Southern Water understands major growth schemes across the region (for example, new garden cities and new villages) in order to forecast timing, location and scale of the development to enable Southern Water to plan for the investment needed to enlarge/upgrade wastewater treatment works (WTWs) and ensure future permit compliance. WDC is and will continue to engage with Southern Water through its emerging Local Plan to ensure that new housing development of all scales is shared with Southern Water, as its spatial strategy is firmed up for its Local Plan. Linked to increased population growth and development are the issues of treatment capacity at WTWs that are covered under multiple challenges, but specifically challenges 3 (tightening environmental permits) and 4 (nutrient enrichment). This is particularly acute in Wealden District (particularly in South Wealden) where the Pevensy Levels Special Area of Conservation (SAC) and Ramsar site is fed by discharges from the Hailsham North and South WTWs and relies on high water quality for its designation.

During the preparation of the Wealden District Core Strategy Local Plan (adopted in February 2013), it was apparent that additional discharges into the Pevensy Levels SAC and Ramsar site may become an effective limit to housing growth until

an acceptable solution for treating wastewater has been identified. We are aware that Southern Water have completed these works recently. However, there continues to be concerns around the ability of Southern Water to maintain the high-water quality standards into the Pevensey Levels, but also for water quality more generally. Depending on the direction and pace of new growth in South Wealden specifically, WDC will wish to proactively work with Southern Water and other associated statutory bodies (i.e. the Environment Agency/Natural England) in relation to sewerage capacity, particularly at Hailsham North and South WTWs to ensure that new housing growth can be accommodated without harm to water quality.

Of the remaining issues, several are also very important to the Council including climate change (challenge 1), carbon (challenge 9) water recycling and repurposing (challenge 11) and infrastructure (challenge 10). These are all key and important future challenges that need to be considered and fully addressed through this draft DWMP. WDC has declared a climate change emergency in July 2019. Under that climate emergency declaration, the Council committed to work towards achieving net-zero carbon emissions by 2050 for both the Council's own operations and the wider Wealden area, and to pursue efforts to bring this date forward if possible. The Council's emerging Local Plan will of course pursue efforts to achieve this (subject to financial viability work) and is also actively considering policy issues around surface water drainage (the use of SuDS) and water efficiency for new developments, including measures that will reduce water consumption that includes water re-use and recycling.

In terms of infrastructure, it is important, as discussed above, that Southern Water recognises the appropriate level of housing growth within the region through its discussions with LPAs and then to provide the right infrastructure at the right time to facilitate that growth. The Council will prepare an Infrastructure Delivery Plan (IDP) as part of its emerging Local Plan process and discussions with Southern Water on both housing growth and infrastructure requirements will continue to be needed to ensure that the emerging Local Plan is deliverable and that there is capacity at all relevant WwTWs in the future. In terms of other significant challenges, I can confirm that WDC has concerns around the low level of upgrading water systems both in terms of pipework capacity and treatment, for new development. These works are funded directly by developer contributions and is generally meant to be undertaken within two years; yet this is not always happening in practice.

Current government housing targets are requiring WDC to push developers towards the shorter implementation of planning permissions for new housing schemes (previously this used to be a maximum of three years for implementation but has now been reduced to only one year in many cases), emphasising the need for Southern Water to meet the 24-month timeline for when the first new homes are built and occupied.

There is also concern surrounding the advice given to the planning service at WDC by Southern Water, whose modelling work appears to be based on a perfect system, rather than the reality on the ground. The Council's planning service is largely advised as part of planning applications for new development that there is capacity for new development connections to a particular sewer, even where it is known Southern Water engineers are carrying out urgent remedial works in that very location. This issue has become an item of great importance to the Council and our community (as can be seen in our response to Question 7 below).

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

WDC agrees that Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment. The level of collaboration and the number of partner organisations seems extensive and far reaching. By working collaboratively with other relevant organisations, Southern Water will be able to understand the progress being made by those other organisations.

WDC currently works in collaboration with Southern Water as part of the Cuckmere and Pevensey Levels Catchment Partnership that includes a number of voluntary groups and other statutory bodies (including Southeast Water, the Environment Agency, Natural England and other affected LPAs) to consider issues relating to the Pevensey Levels SAC and Ramsar site amongst other issues in the catchment. The breadth of organisations that work in this partnership is beneficial and work through this partnership has been key in ensuring that the catchment is well maintained. WDC also works with the Pevensey and Cuckmere Water Level Management Board (that includes two WDC Members) who manage much of the drainage system within the Pevensey Levels SAC and Ramsar Site and the wider Cuckmere Valley.

The other key issue for the Council with collaborative working is to ensure that Southern Water understands the LPA's position on endeavouring to meet government housing targets (or at least as far as it is able given District's significant constraints) through its emerging Local Plan. Paragraph 20 of the NPPF (July, 2021) confirms that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for water supply and wastewater (amongst other matters). Further collaboration on this issue will enable Southern Water to understand how many additional customers they will need to provide water and wastewater services to, instead of basing this information on Experian population forecasts and extant planning permissions that will likely underestimate housing growth in the medium to long-term. This will allow Southern Water to have effective planning and investment decisions for the longer term. The Council would welcome more collaboration on this issue through the emerging Local Plan process and will provide further information on such issues through the plan-making process as it develops its Local Plan.

Paragraph 26 of the NPPF (July, 2021) confirms that effective and on-going joint working between strategic policy-making authorities and relevant bodies (i.e. infrastructure providers and statutory bodies) is integral to the production of a positively prepared and justified strategy. Therefore, LPAs are required in any case to collaborate with Southern Water as part of their emerging Local Plan process. Although not currently identified by the draft Regional DWMP, it would be helpful to understand how such collaboration between Southern Water and LPAs should be documented, as LPAs will require this evidence as part of any Local Plan examination process. Paragraph 27 of the NPPF (July, 2021) confirms that 'strategic policy-making authorities' should prepare Statements of Common Ground, although the NPPF is silent on how this could be dealt with for infrastructure providers and other statutory bodies. WDC will work with Southern Water on this issue and will consider the best method to evidence its collaboration for Wealden's emerging Local Plan.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

In relation to Question 4, from WDCs perspective, the three main investment plan priorities are ensuring sewer flooding is reduced/eliminated, sewer conditions are improved (to reduce sewer flooding) and wastewater regulations are complied with (particularly for the Pevensey Levels SAC and Ramsar site, which is discussed at length for Question 2 of our response). These are the key priorities for investment to enable WDC to confidently deliver housing growth in line with the current NPPF (July, 2021), whilst continuing to protect the natural environment including designated sites. It is known that Southern Water does receive significant levels of developer contributions to fund this very work. The first two issues surrounding sewer flooding have been ongoing for a number of years within Wealden District (particularly in South Wealden, but in other parts of the District too) and is a key concern for local residents who have experienced sewer flooding issues on various occasions.

Indeed, as recently as of 20th July 2022, WDC has passed a cross-party motion on sewage and drainage issues at its Full Council meeting that resolves to:

Recognise this Councils' obligation to protect its rivers and seas, including from the cumulative impacts of pollution, in line with its local strategy and the NPPF;

1. Recognise the deterioration of water quality occurs due to cumulative impact of multiple sewage discharge events, or 'sewage overload';
2. Ensure that the evidence base is compiled that assesses the cumulative impact of sewage discharge so that this is factored into decisions made in new iterations of the local plan, including the overall level of future development;
3. Seek to understand the cumulative impact of wastewater discharge including untreated sewage on our local rivers, wildlife and health of our residents;
4. Continue to take a lead on addressing this issue, working constructively with other agencies;
5. To invite the CEO of Southern Water, plus senior representatives from the Environment Agency and Natural England to attend the meeting to answer questions on the current levels of sewage discharge;

6. To ask Southern Water, from this date onwards, in its planning consultation responses for major development, to clarify which treatment works will be managing the sewage; whether it has information available to assess the impact on the number or duration of sewage discharges into local rivers or seas, and if it does have this information to share it (noting that this can only be requested, not required); and
7. Request that planning officers, from now onwards, include in all relevant reports relating to major development a specific section on the impact on watercourses, including the potential for the development to affect sewage outflow into watercourses

Given the above, it is clear that both sewer flooding and wastewater discharges are significant issues for the Council as a whole and will be scrutinised through its work on the emerging Local Plan and planning applications for major development. However, the enhancement of the environment is also important and although placed fourth in the priority list above, this should not be read as the issue not being important. The environment is both dependent on water quantity/quality and the control of pollution events, as well as being useful in addressing issues that can cause water quality to be compromised (i.e. slowing infiltration or runoff overwhelming sewers or leaking into groundwater systems). The issues are not mutually exclusive, and a holistic approach should be taken for all these priorities to ensure that development can come forward, whilst protecting the natural environment and existing/future residents in the District.

In relation to Question 5, WDC considers that in the backdrop of significant future development proposed for the region (including Wealden), the opportunity to remove additional rainwater from the sewage system should be embraced, to lower the risk of new development creating greater levels of surface water flooding. However, there needs to be some recognition of the divide between existing development and new development. For the latter, natural solutions can be implemented as part of new development and through the provision of SuDS that the Council will aim to support as part of its emerging Local Plan. However, in view of the current planning system, it is clearly not possible for an LPA to rectify past / current issues, where there are issues of surface water flooding. It also needs to be recognised that retrofitting SuDS to existing built-up areas to minimise the amount of surface water entering foul or combined systems is very difficult, and even if funding were available for this, due to a lack of physical space, this may not be implementable in some cases (e.g. Wren Close, Heathfield and Western Road, Crowborough).

In relation to Question 6, it is considered that catchment wide nature-based solutions are an important factor as they can help achieve environmental aims as well as being, in some instances, more cost effective in comparison to engineering solutions, which may require significant maintenance. Nonetheless, there will be cases (particularly for existing issues) where engineering solutions are required.

Lastly, Wealden is a large rural district with high levels of agriculture and large numbers of homes not connected to the mains network, so pollution from nitrates is the single biggest groundwater quality issue and tackling it is also of a high priority to the Council.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

WDC generally agrees that Southern Water should prioritise best value options that reduces risks across many planning objectives, rather than the least cost. Given the levels of housing growth expected across the region (as established through the NPPF), the draft DWMP clearly outlines that significant investment is required to ensure that water management is a high priority and the risks portrayed are minimised, if not eradicated. This clearly aligns with the aims of WDC. In terms of value, this should be based on the areas / properties / people that a solution benefits. Indeed, the most beneficial in terms of value is not necessarily the most expensive or the cheapest solution and is likely to fall somewhere between those two extremes.

This does however highlight another issue in that long term growth within local authority areas is not necessarily known (or is partly known) for local authority areas at this stage, (since this will be established through new Local Plans as they come forward). Given the above, this draft DWMP will need to be continually iterated upon in future years to ensure that investment decisions are genuinely located within the right catchment areas and continue to represent best value options. This is indeed critical for some investment decisions such as WTWs and their overall capacity, as the delivery of new homes is dependent on not exceeding the 'headroom' of specific WTWs.

However, WDC does question whether a "maintain" core investment strategy is enough (i.e. replace assets like for like when needing replacement; or accept that climate change and growth may cause slight deterioration in levels of performance), given the extent of climate change already prevalent, increasing development pressures and the difficulties already evident with sewage overflows etc. It should be emphasised that Southern Water does receive significant levels of developer contributions to ensure that such projects are delivered. WDC considers that there should be a greater emphasis towards an "improve" or "change" investment strategy to ensure that long term issues such as climate change and development pressures are planned for appropriately, rather than just dealing with short-term fixes.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Southern Water confirms that affordability for the customer is a significant challenge (challenge 12) for the draft DWMP, particularly given the current cost of living crisis and that Southern Water needs to carefully consider the costs of how to manage the future challenges and achieve its environmental ambitions. Although WDC agrees this is a significant challenge, it is considered appropriate that first Southern Water consider reducing profits and shareholder dividends, in order to increase investment, in conjunction with a greater level of central government funding to correct historic issues rapidly. Finally, it may be necessary for increased customer contributions, but only where it is evidenced that the step change in delivery is taking place on the ground. Simply 'maintaining' our water infrastructure in light of the identified challenges above is not a genuine option; investment to correct the mistakes of the past is clearly required. Developer contributions received by Southern Water also needs to be spent where growth is taking place, rather than putting the funding emphasis on existing bill payers in the first instance.

WDC does consider it necessary to update and upgrade current water infrastructure, to investigate new alternatives and futureproof the network. The Council's emerging Local Plan will of course pursue efforts to achieve this (subject to financial viability) and is also actively considering policy issues around surface water drainage (the use of SuDS) and water efficiency for new developments, including measures that will reduce water consumption, including water re-use and recycling. This should also assist Southern Water in achieving its objectives without significant detrimental impacts to customer bills.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:** WDC notes that the draft regional DWMP is supported by five Investment Plans that set out the investment needs for the region. This includes investment plans for internal sewer flooding, sewer condition and groundwater pollution, storm overflows, compliance and pollution and the environment. It is noted that these investment plans identify a wide range and type of investment in water infrastructure, including upgrades at WWTWs, which is to be supported.

However, it is clear that much of this investment is based upon Experian modelling information of what the population might be in 2050, which we have stated elsewhere might actually underestimate household growth during the period. This could impact decisions on investments in water infrastructure over the longer term.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

It is noted that a Strategic Environmental Assessment (SEA) has been undertaken for the draft DWMP in line with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This will be considered by the appropriate statutory bodies (namely Natural England and the Environment Agency) so we have no comments to make on this at this stage.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Both the 12 significant challenges identified by the draft DWMP at page 10 and the Planning Objectives set out in Box 1, Page 14 of the draft DWMP are clearly identified and WDC agrees with these at the general level. The aims of the draft DWMP are therefore relatively clear, albeit that this is not necessarily shown at the lower geographical area (i.e. the catchment area) as considered below.

### **What do we need to improve in our DWMP?**

WDC notes that this is a wide-ranging document and covers a vast geographical area (from the New Forest to the Medway/North Kent). Nonetheless, the useability of the document for customers and local authorities alike is not ideal and it would have been helpful to have been provided a brief summary of the main impacts of this report on the particular catchment areas that affect them (i.e. for WDC, this is largely the Cuckmere and Pevensey Levels catchment area).

As discussed throughout the response, there are also significant concerns around ensuring that the correct household requirements over the longer term for the geographical area are caught and that the emerging Local Plans that will require significant levels of new housing are considered by Southern Water. It is known that the NPPF (July, 2021) and the 'standard method' for calculating housing need has resulted in a step change in housing growth and this will need to be recognised within the draft DWMP (for example, the Wealden District Core Strategy Local Plan (adopted in February, 2013) only expected the delivery of 450 dwellings per annum (dpa) and the current 'standard method' calculation is 1,212 dpa). This would potentially result in both higher population growth and increased urban creep (i.e. more hardstanding and less infiltration). However, it is recognised that the planning system is inherently uncertain, so investment decisions will need to be taken on the current planning information available to Southern Water.

Finally, it is considered imperative for both the health of the public and state of the environment that this plan act as a catalyst to deliver the change necessary across our sewerage network. As can be seen from the Council's Full Council Motion on 20th July 2022, the Council and our community have lost faith in Southern Water to deliver the infrastructure needed for our area. All too often communities are promised action and investment, be that to remedy a historic issue or through upgrades to support new growth, only to find that action is not forthcoming and the situation is made worse. Over the last few years, the Council has been pressing for change, encouraging action, but seeing little. Staff at Southern Water will know well the issues at Station Road in Hellingly; Back Lane in Cross-in-Hand and Horebeech Lane in Horam, to name but a few. In all these cases investigation, investment and solutions have been promised, but been slow to materialise, all the while residents suffer with sewage backing up in their homes and gardens. Wealden is a willing partner, ready to work with Southern Water to make genuine improvements to the situation for residents and the environment, we hope that this plan will encourage Southern water to do the same.

ID 4002

**Organisation**

Rother District Council (Planning Policy)

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

The Council agree that the 12 challenges identified within the Planning for the Future section address the major pressures that will impact wastewater treatment. It is positive to see that ageing assets and infrastructure is considered a key issue as a large proportion of the sewer network in the urban areas of Rother District are from the Victorian era.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Planning Policy officers at the Council have been continually engaged throughout the DWMP process, which has allowed us to work with Southern Water from an early stage. The Council has been pleased to see a range of different stakeholders in meetings and we are keen to see these links continue through to the implementation of the DWMP to ensure that the best outputs occur. Rother District Council would also like to be engaged on particular investment options, as and when necessary.

The Council has previously engaged with Southern Water on cliff stability issues in the Fairlight area. It appears that this investment opportunity, that was identified in previous engagement sessions, has now been taken out of the DWMP. This is disappointing, and there is a further response on this in relation to question 10.

The Council will be preparing a Water Cycle Study (WCS) to support the production of its Local Plan. Whilst only at Scoping Report stage, the Council envisage that Southern Water will be a key stakeholder and partner in helping deliver the WCS, which will take on board the key water based planning issues for the Local Plan. This process will involve collaboration with many infrastructure providers and water based organisations, such as the Lead Local Flood Authority and the Environment Agency. Additionally, Southern Water will be a key consultee for the Council's Infrastructure Delivery Plan (IDP) to support the identification of infrastructure to support growth in the emerging Rother Local Plan (2019-2039).

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Response to Q4 – We found it difficult to rank the five issues as we feel they all play an equal and interrelated part in the future investment needs required. Nutrient neutrality has become a growing issue in England, with the announcement in March increasing the number of catchments impacted by the unfavourable conditions in protected sites. Nutrient neutrality was highlighted as a priority in the Baseline Risk and Vulnerability Assessment (BRAVA) analysis of a number of catchment areas, and in several areas of the country has resulted in a moratorium to development. Whilst the two catchments that are within Rother District Council (the Cuckmere and Pevensey Levels and the Rother catchments) are currently not impacted by this issue, it is the concern of officers that the protected sites that fall within the catchments, mainly Pevensey Levels and Dungeness European complex of sites, could deteriorate and trigger Natural England’s intervention. This is of particular concern for the Rother catchment as the WTWs across our authority drain into the Dungeness European complex of protected sites around Rye Bay and the English Channel which along the coastal strip is designated as the Dungeness, Romney Marsh and Rye Bay Special Protection Area . Whilst the Bexhill and Hastings WTW drains directly into the English Channel, it is our understanding that any surface water runoff resulting from development near to the Pevensey Levels could harm the condition of the Pevensey Levels and therefore could impact the whole catchment, and so that is also a concern, particularly as Bexhill is the largest town in the District.

Second is the wastewater compliance and pollution. This is because the Dry Weather Flow (planning objective 8) is contained, and it is important that there is enough capacity in the network. Rother District Council maintain significant concern over a lack of sewer capacity in the Bexhill area and its contributing impact to slowing the delivery of major allocated development. This issue is expanded on further in question 10 in relation to the identified investment needs. The interrelated issues on sewer condition and groundwater pollution, sewer flooding and storm overflows all have impacts on the people who live and work in the District, and we support the acknowledgement of the impacts that storm overflows and resulting wastewater discharge can have on bodies of water.

Answer to Q5 and Q6 - The Council consider that nature-based solutions should be prioritised, as well as separating surface water from sewers, and the Council has an adopted Local Plan policy which requires SuDS to be an integral part of new development. However, traditional engineering options should not be discounted as there are some issues that will likely require these solutions, such as to improve overall capacity at the WTWs.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

The best value approach allows for larger projects that might otherwise get discounted in a least cost scenario to be prioritised. If an investment option can address multiple issues this should be encouraged. However, any approach taken should ensure that the investment options made can meet future issues and have enough headroom, especially on investments that are addressing climate change, where the modelling is not definitive, such as is noted for planning objective 4 (risk of sewer flooding in a 1 in 50-year storm).

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

The Council has chosen not to answer this question as it does not have expertise on this issue.

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

Planning Policy officers are thankful to Southern Water for holding early engagement earlier in the year on the investment needs required and for allowing our input before this consultation.

As previously mentioned, nutrient neutrality is a key issue of concern for the Council. Therefore, the Council is pleased to see that nutrient budgets are to be explored for the three WTW that affect Rother District, namely Bexhill & Hastings, Rye, and Fairlight. As previously mentioned, the Council are keen for other stakeholders, such as Natural England, to be involved due to their statutory powers regarding the protected sites. In addition, the investments into surface water removal are also supported. The Lead Local Flood Authority will need to be engaged on this.

We would repeat our previous stance that any investment needs that may involve the Council would require further discussions and be subject to any resource and funding opportunities we might be able to offer.

We are disappointed that key investment needs that were identified in the spring early engagement have either not been carried forward at all or have been listed within the catchment page's investment needs, but not in the five investment needs plans that accompany the level 1 DWMP. We make our comments in relation to this below, for each WTW where investment is proposed:

**Bexhill and Hastings WTW**

We welcome and support the inclusion of previously identified investment needs in the DWMP's five investment plans. In summary, these are:

- Works to improve the resilience of the WTW (identified as Prioritised Investment Needs in the Investment Plan for Compliance and Pollution) alongside further works at the WTW to review the permits with the Environment Agency and deliver any associated works to increase the capacity of the works.
- Works to reduce spills at Peartree Lane WPS, Hartfield Road CSO, Galley Hill WPS, Chestnut Walk WPS, Bexhill Down CSO, and Brockley Road CSO.
- Plans to reduce the risk of flooding at the Galley Hill WPS by improving its resilience. Projects to reduce the risk of pollution from the Galley Hill WPS and Chestnut Walk WPS; and.
- A catchment-wide study to improve the modelling which will look at storm and dry weather flows.

We note that these projects represent a large investment into the Bexhill and Hastings area at over £17.8 million.

However, plans set out in the draft investment needs, in Spring 2022, identified a scheme of works across the WTW area to

attenuate excess flows in the sewer network through various additional means, of which two of the locations listed were within Bexhill (Terminus Road at £1.99 million and Ninfield Road at £2.7 million). These plans now only appear under the Cuckmere & Pevensey Levels investment needs on the Options Development and Appraisal page. The Council are concerned that the status of these works has been diminished. We consider that works to improve the capacity of the network in Bexhill are necessary to ensure the network is future-proofed for planned major development.

We reiterate our comments made in April 2022 regarding works in Bexhill. We are very disappointed that the limited foul drainage capacity in Bexhill is not clearly recognised or prioritised in your Investment Plan for Internal Sewer Planning. We note that other catchments have prioritised identified needs for Growth Drainage Area Plans (DAPS) in Table PO7 and we do not understand why Bexhill and Hastings does not. The limited capacity in Bexhill was initially identified, following consultation with Southern Water, in the Council's January 2007 North-East Bexhill Drainage Study. Since then the following actions have taken place:

- The Rother Core Strategy Local Plan was adopted in 2014, planning for housing growth of 3,100 dwellings in Bexhill between 2011 and 2028.
- Planning permissions for a significant proportion of these sites has been granted as well as permission for over 60,000sqm of employment floorspace in Bexhill,
- The Council has advised Southern Water that it anticipates that further significant growth will be planned for in Bexhill in its new Local Plan (2019-2039).

A series of high level meetings to discuss these issues with Southern Water, landowners, developers and senior Rother DC officers were held. Southern Water designed a Strategic Solution, through a North-East Bexhill Sewer in August 2019 and highlighted and confirmed the capacity issues.

This Strategic Solution appears to now not be recognised and yet the current capacity issues are delaying delivery of development. Documents relating to these meetings and planning decisions were submitted to Southern Water as part of our early engagement consultation in Spring 2022.

#### Rye WTW

The majority of investment needs that the Council were previously consulted on, in the Rye WTW catchment have been carried forward. These include multiple projects to the WTW itself to increase the capacity through a permit review and settlement tank improvements. Looking at catchment wide projects, works to improve the jetting of pipes, customer education projects, and an improvement to the models used. There are also several location specific projects that have been identified, such as works in the Old Town to reduce blockages and pollution incidents through pipe improvement works. There is also a project to reduce the risk of spills at the St Margaret's Terrace CSO through enlargement works, and also a more general resilience improvement at the Wish Street WPS. The projects identified in the investment needs total over £4.1 million and covers a large remit.

However, there was an uncosted project for upsizing the sewer near Jempson's Yard that has not been carried forward. Another uncosted option was to deliver surface water drainage schemes at Rye Primary School, Rye College and Car Parks. This project appears on the Rother catchment options development and appraisal page only. As such, we ask for confirmation of the status of these projects. The Council would like to reaffirm its position that any works to improve sewer capacity and surface water drainage would be welcome.

#### Fairlight WTW

Most of the identified investment needs from the spring have been identified in the DWMP. There are plans to reduce the number of spill events at the WTW by attenuating excess flows. There also include catchment wide projects to improve the jetting of pipes, customer education projects, and an improvement to the models used. Alongside the previously mentioned nutrient budget, these works are estimated to cost £1.3 million.

However, a project on Lower Waites Lane to monitor the integrity of the sewer, and a study to look into the surface water drainage onto the cliff at Channel Way both appear to have been only included within the investment needs found on the Rother catchment page. As with other projects that are only listed here (and not on the five company wide investment plans) the Council are concerned that the status of these projects has been diminished and require confirmation from Southern Water that this is not the case. The issues at Lower Waites Lane have been of interest to Councillors and residents, so reassurances that this work will continue is necessary. The removal of the Channel Way study from the investment plan is also of concern because the Council have been working to address the issue of cliff stability in Fairlight. In July 2022, the Council made two Article 4 directions (<http://www.rother.gov.uk/Fairlight>) to remove specific permitted development rights on certain properties on Sea Road, Cliff Way, Rockmead Road, Smugglers Way, Channel Way, and Lower Waites Lane. This means that any relevant works near the cliff require planning permission and allow for the proposal to be fully considered.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(e) I don't know

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

The Council do not consider it necessary to comment on the SEA of the DWMP.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

The Council would like to acknowledge the scale of work that has had to be undertaken to compile this DWMP and have been pleased to see that the areas that have been identified as needing investment broadly align with our views.

**What do we need to improve in our DWMP?**

The Council wishes to see all of the investment needs that were identified in previous workshops and engagement sessions carried forward and implemented, as we feel these issues remain of great importance to be addressed by the DWMP.

ID 4003

**Organisation**

Horsham District Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

You place all the emphasis on beaches and shellfish areas and neglect rivers. So my answer would have been 2 if not for that omission.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

SW are a statutory consultee in planning terms with authorities like mine. It is clear in view of water neutrality and the present-day issues and likely future issues that we work together.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

separate letter sent to Dr Mills by post.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

To remedy the aging assets and to improve in line with legislation more capex is needed. Part of this should be a reduction in dividend policies to shareholders and a tighter management approach to paying off loans to asset capital.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

the onus should be placed on the company first (see previous answer) but also some cost should come to users and industry.,

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

I do not have enough information, or it is not clear enough for me to judge the exact amounts. in principle yes but as i said not enough attention is paid to rivers and too much to the coast.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

no comment

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

I liked the clear explanation of the issues and problems in many of the pages and the catchment data too.

**What do we need to improve in our DWMP?**

The data in places is unclear or you provide it in a way that I cannot compare data. Eg page 37 spills 20,000 for 200,000 hours but for 2021 on page 39 I cannot measure up. A year-by-year table preferably by the highest 10 say WTW spills would be useful. The language at times is very dense and needs shorter sentences and clearer statements.

ID 4004

**Organisation**  
Horsham DC

**Are you happy to be contacted about your feedback?**  
No

**The main challenges for drainage and wastewater management are identified in the DWMP.**  
(2) Agree

**What do you consider to be the most important future challenges?**  
Zero wastewater discharges (river and sea)

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**  
(1) Strongly agree

**Please explain your answer:**  
You should be properly, and independently, monitored and regulated by a fully funded Environment Agency. Not sure if you'd call this collaboration, but it would be in SW's interest to collaborate.

**The priorities for future investment should be: My number 1 priority is:**  
Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Generally speaking, if you get them right then nature based solutions should be largely self maintaining.

However, in new large housing developments (say > 100 dwellings), the installation networks to separate sewage and rainwater should be a planning condition, with the full network and post treatment in place before the first dwelling is occupied.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Basically all water companies should never have been privatised - you are there as a monopoly supplier of what should be a public good, and you have a lot of catching up to do. Reducing risk should be #1.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

See answer above.

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

The range is OK, but maybe difficult to assess your perceived priorities?

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Structured analysis behind it.

**What do we need to improve in our DWMP?**

Better summary for policy makers, plus consider more radical action for new build housing.

ID 4005

**Organisation**

Isle of Wight Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

- Sea level rise and/or sea wall breach permanently inundating the Sandown WTW and it's surroundings as the sea reclaims the valley.
- Ageing seawalls deteriorating and failing affecting vulnerably located SW facilities and infrastructure around the IW coast.
- Vital to not put water into the ground in the known coastal landslide complexes of marginal and declining ground stability which underlie Ventnor, Bonchurch, St Lawrence, Niton, Blackgang, Cowes and Gurnard.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(4) Strongly disagree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

Whilst usually a good thing, separating out rainwater is the exact opposite of what is required in the vulnerable urbanised coastal landslide complexes on the Isle of Wight, affecting significant areas of the south (Ventnor Undercliff) and north (Cowes-Gurnard) coasts and the towns and villages there. There, all water should enter piped disposal systems, and be kept entirely out of the ground. It is also vital to fix leaks straightaway. Any water in the ground will reduce ground stability and help trigger ground movement which will damage SW infrastructure, both pipe networks and much larger fixed facilities, dependent on the scale of ground movement and landslide reactivation triggered. For information, see the Isle of Wight Council website, then choose Coastal Management and Landslides and Ground Movement.)

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Acknowledging a range of risks and that investment is needed.

**What do we need to improve in our DWMP?**

The section on the Isle of Wight reading as follows requires amendment:

'A summary of the investment needs for these systems is:

- Surface water separation
- Increase capacity of the Wastewater Treatment Works (WTW).
- Optimisation or extension of site to allow for a DWF up to 47371m<sup>3</sup> required due to growth in catchment (Permit Review Required)
- Construction of new gravity sewer and pumping station
- Upsizing of existing gravity sewers.
- Surface water separation
- Increase in online storage. '

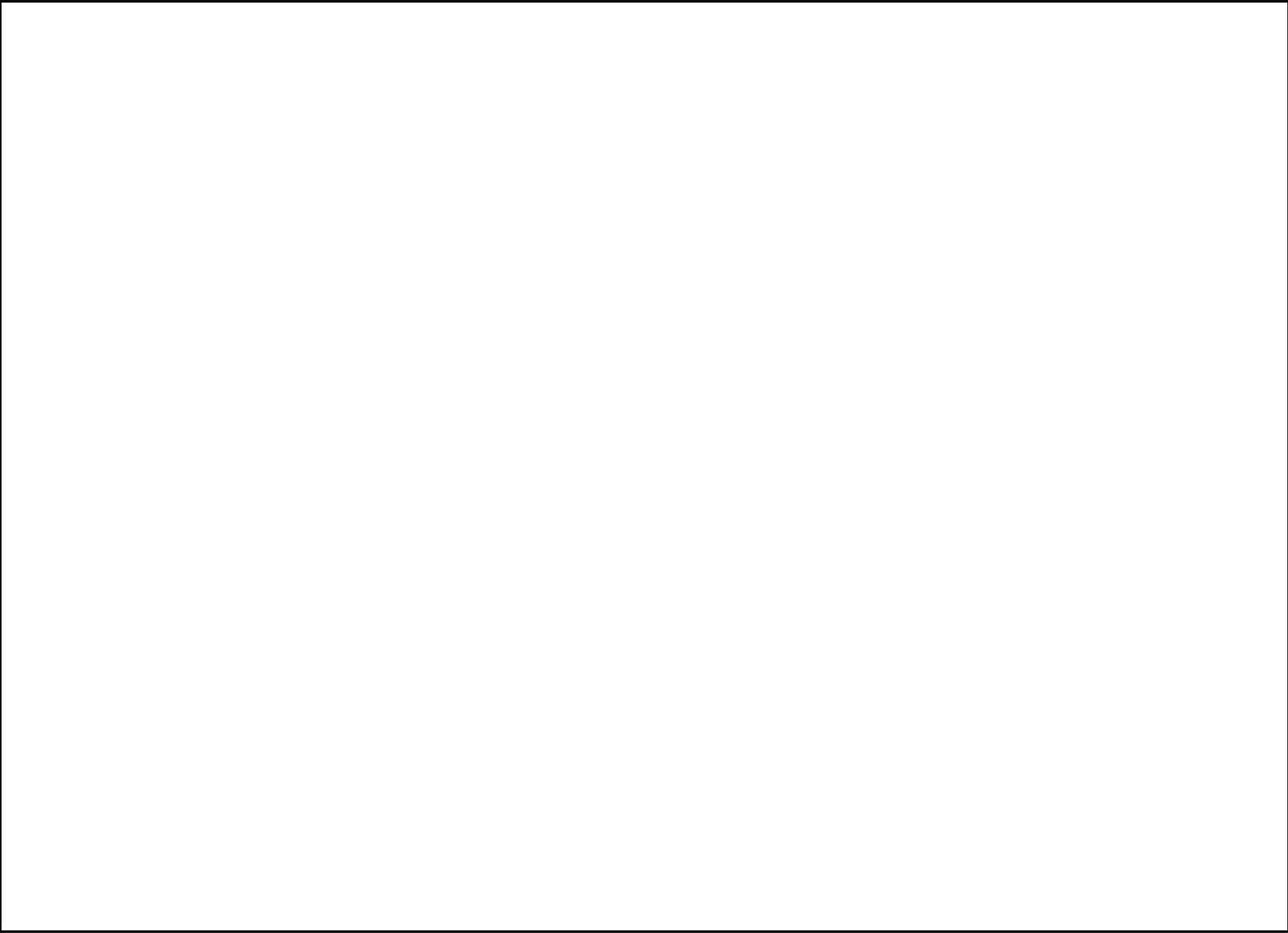
A bullet point should be added to the start of this list the need to: Prevent seawater flooding of the Sandown WTW and its surroundings, which is a significant risk already existing and which is increasing risk in the future, which can permanently change the area, which will occur when the seawall embankments at Yaverland and Bembridge Harbour breach and fail, and acknowledging that these require significant investment to maintain and raise currently and in the future.'

This investment need should be specifically added to the DWMPs investment plans.

Also at risk are SW facilities in Shanklin, Hope Beach/Shanklin Esplanade; Ventnor Bandstand and Flowers Brook in Ventnor; where current coastal schemes are being developed to reduce these risks which also require investment from those who would benefit from the schemes including Southern Water; and also planned works are needed along areas including the Cowes-Gurnard esplanade, which can breach and landsliding reestablish, in the area where the water connector cable link is linking the IW and the mainland.

Southern Water needs to actively engage with the Environment Agency (the EA PSO team for the IOW) and the Isle of Wight Council to discuss these vital coastal defence investment needs and increasing risks (erosion, sea flooding and landsliding). Thank you for all the engagement and discussions to date, which we are very keen to continue.

It is also essential that the DWMP also states specifically that Sustainable Urban Drainage Systems/SUDS/any works to encourage water to enter the ground not wastewater systems -are NOT appropriate in the two known areas of coastal landsliding on the Isle of Wight, in Ventnor, Bonchurch, St Lawrence, Niton, Blackgang, and also in much of Cowes (West Cowes) and Gurnard. There it is vital all water is kept out of the ground (which is of marginal and declining ground stability), and all water should enter piped disposal systems to be safely discharged away from the landslide areas. The increasing risk in those areas is to Southern Water's as well as their customers infrastructure, homes, roads etc. Further information on these areas of landslide risk underlying the towns is available on the Isle of Wight Council's website.



ID 4006

**Organisation**

Southern Water

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Health and environmental impact

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Collaboration is essential, it creates better understanding of connecting strategy & negotiations among key organisations.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

Priority differs from person to person, these are the options that I have provided that seem most sensible or appropriate. After reading a majority of that reports provide it still seems like there is a long way to go to support everyone's best interests.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 4007

**Organisation**

Southern Water

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Affordability of meeting ever increasing levels of service against a backdrop of customer, government and regulatory expectations of ever lower bills.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(4) Strongly disagree

**Please explain your answer:**

Southern Water will always be responsible for delivering the outcomes placed upon it by our environmental regulators. We cooperate and liaise with third party stakeholders all the time as part of the normal business as usual approach for delivering improvement schemes. However, these interested third parties very rarely have any "skin in the game" and cannot be relied upon to deliver the objectives that Southern Water are required to within the budgetary constraints and time scales needed.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(4) Strongly disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Catchment wide approaches rely upon third parties to change their activities, methods and behaviours. Third parties have different priorities and agendas to Southern Water. Farmers for example need to be incentivised by government and more heavily regulated by the Environment Agency to deliver more sustainable agricultural practices. It should not be up to Southern Water to have to undertake the "re-education" of other industries. We are a water and wastewater company, we are not the regulators or law makers.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

I agree up to a point but unfortunately the business and its owners always revert back to lowest cost. Similarly, the regulatory environment for water companies is contradictory; OFWAT demand ever decreasing bills in real terms whereas the Environment Agency demand ever increasing standards. It is that which drives the behaviours of the business and its owners.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

There absolutely needs to be an honest conversation with all of Southern Water's regulators and customers. Making that quantum shift to significantly higher standards of wastewater treatment and very low risk of spills to the environment is going to cost a lot of money. It is the green outcome that everyone wants but will they be willing to pay higher bills to have it?

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

Yes, these are the improvements customers want to see delivered.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

The cost of delivering the improvements that customers want us to is quite frankly HUGE. I like that we are laying out all the information and giving people a taste of what it would cost to them.

**What do we need to improve in our DWMP?**

I get that it is a document maybe aimed at our regulators more than our customers (?) but maybe a few more pictures would make it more easy on the eye.

ID 4008

**Organisation**

Southern Water

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Climate change and population growth

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Southern Water cannot do this alone - we need permissions from many other agencies to carry out the work needed and not be held up by other organisations red tape.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

I believe Compliance and Pollutions is that are we should look at most due to both our previous history and also as this is the area that can have the greatest effect on the environment. Sewer flooding is next for me as that is the next issue that causes the most issues in my experience. all in all there seems little point in prioritising enhancing the environment before we have fixed the issues that potentially destroy it.

With regards to rainwater separation this would have a huge impact on the issues we face as it would effectively reduce issues on our sites massively.

I do not know enough the differences between nature based solutions and traditional approaches to have an opinion either way on this.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

A question of value for money. There are many potentially quick, easy and relatively cheap wins that might solve an immediate issue but often these methods have solved the obvious problems but not looked at the reason behind the issue and often have to be looked at multiple times to solve the issue and ultimately costing more in the long term.

A strategic and balanced approach to understanding the problem and fixing it the best way (not necessarily the quickest or cheapest way) should be encouraged.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

Whilst we are criticised for making too many profits (a different argument for another day) we need to increase spending to allow us to make improvements now and we can only get that from increasing bills. A structured way of increasing bills over the next few years to allow for improvements over the next 10-20 years should be vigorously encouraged.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

It seems a sensible way of investing to secure a better future.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It sets out a clear road map for the future.

**What do we need to improve in our DWMP?**

For customers I believe it needs to be clearer as to what would happen if we do nothing - I think the Maintain route sounds safe and might seem to be a good option when it might not be the best option.

ID 4009

**Organisation**

Ouse & Adur Rivers Trust

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

We consider the most important future challenges to be centred around climate change and population growth. However, we consider the link between these two challenges and the health of our rivers, streams, lakes and coastal waters to be of upmost importance in the short, medium and long term.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

It is clear from the DWMP documents for the Adur & Ouse Catchment that there is a reluctance to move away from, investigate or consider the vast array of options for surface water or drainage management. This DWMP process (in our area) has disappointingly resulted in a long list of the same option, which we consider unsuited to deal with your challenges. Despite the wealth of experience and knowledge at your disposal through the consultation process to have maintained the line on grey engineered, storage tanks fails to move Southern Water into line with current knowledge or thinking. Only by working in collaboration with other organisations, considering new or emerging partnerships, will you be able to sustainably and cost effectively resolve the complex but serious issues within the drainage and wastewater system and have a measurable impact on improving the environment.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

These subjects should not be assessed in isolation but a joined-up thinking approach to tackling these issues. Investing in improving the environment would see the delivery of nature-based solutions which enabled wastewater compliance and reduced pollution. Separating or storing rainwater through the delivery of NBS would go a long way to tackling some of these issues. There must be a more integrated approach to these issues, and we are disappointed that the DWMP process has not picked up on this messaging which has been clear throughout the consultation.

We would therefore prioritise sewer condition as failing infrastructure is the only one of these options which cannot be positively impacted by another.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Sustainable, long-term solutions which provide resilience within the system beyond the normal periods will lead to reduced overall costs. Delivering multiple benefits should be the preferred option in all cases rather than an add on. Following the least cost path initially will inevitably lead to future, higher costs in re-engineering. The solution to your problems sits not just at specific sites but across the landscape as a whole and each site taken through this process should have investment which reduces as much risk as possible in one go.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

Yes, but you need much better clarity of messaging to customers and bills which reflect the investment being made and the improvements which are resulting. There is unlikely to be support for increased bills if the situation stays as it currently is but discernible improvement in operations will gain supportive momentum. However, as a business with shareholders you will always be criticised for payments going out from profits whilst bills increase. We believe that the aspiration should be all risks reduced to band 0 but this should be site specific where it is possible to do so.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

We see no place for Defer within the strategy, defer is a negative approach and is not necessary if the prepare option is followed

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

We believe that PO9 is unrealistic and does not reflect the extent of environmental improvement. Our number one priority is in getting the GES BUT our most important objective should be in no further deterioration of waterbodies.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

The concept of the engagement process was fantastic and the communication with Sally and David has been great.

### **What do we need to improve in our DWMP?**

We have found the documents for the Adur & Ouse Catchment which have come out of this process to be very disappointing and to have disregarded the input from the hours of consultation and document reading which has been undertaken as part of this process. The site selection for the catchment is unrepresentative of the information within the supporting documents and we can see no clarity of reasoning behind the decision-making process. There is a clear neglect of the impact of Drainage and WasteWater across the surface water bodies of the catchment and apparently a lack of appreciation of the WFD importance of these operations. 40% of the failings of surface waterbodies in the catchment are directly attributed to wastewater treatment and the sole focus on bathing water status within this plan is also disappointing considering both integrated catchment management and source to sea approaches form the heart of building resilience. We also find the options taken to be solely focused on grey engineering through building of additional storage tank capacity within the network (which won't mitigate the long term impact of climate change if you are working to a 1:50 year flood scenario) and it was suggested that this return period was elongated to provide for futureproofing of the investment, To have not included a single nature-based-solution within any of the catchment documents fails to understand the breadth of the toolbox available in providing resilience (and multiple benefits). In effect, this DWMP process has completely ignored any surface water catchment in the Adur & Ouse and this is unsatisfactory for the health of our water environment.

This consultation does not specifically allow for comment on the individual plans (which is where expertise exists in smaller geographical catchment areas) and specific questions about specific catchment areas would enable more constructive feedback to be given.

There needs to be a much clearer display of the decision making process (for our area - why is Goddards Green not included when it matches or is higher impact than sites that have been selected?) We can find no justification for this and it is of great concern that this site will be allowed to continue as normal until the next DWMP is produced for PR29.

We appreciate that this is the first one of these but considering the time and effort from ourselves as stakeholders which has gone into being involved in this it feels like the process was set from the start and we would consider the relevance of our future involvement in the development of these plans if the results will not reflect the input which has been given or seeks to go beyond traditional engineering solutions within the existing network of our catchment area.

ID 4010

**Organisation**

Chichester District Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

These are all important.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Agree that working with all of these partner organisations is important to ensure that wastewater provision is appropriately provided for, and that future population growth and associated development is taken into account.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

We have not ranked the priorities for future investment as they are all important.

Agree that catchment wide and nature-based solutions should be the priority as these will have wider benefits for the environment. However, there may still be a role for engineered approaches in some circumstances.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

This is the best way to secure multiple benefits.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

We agree in principle as reducing these risks is important for protecting the environment. However, it does depend on how much customer bills would increase by - bills still need to be affordable.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

Although we broadly agree there is a concern about whether some of the solutions proposed are deliverable and the long term timescales for schemes that would provide solutions in catchments already needing improvement.

The Council's responses to previous consultations set out concerns that the urgency of capacity issues at some of the wastewater treatment works had not been identified, appreciating this is partly due to the use of historic dry weather flow data prescribed in the DWMP process.

Whilst these concerns have been taken on board to some degree, which is welcomed, Chichester District Council remains concerned that treatment capacity will be reached or exceeded at many of the wastewater treatment works in the Chichester Plan Area in the short term, before the permits can be reviewed or other changes made that will have an impact on available treatment headroom.

As indicated in our response to the April 2022 stakeholder consultation:

Based on the latest Dry Weather Flow information (and tables produced by Southern Water's Strategic Planning Team) additional capacity will be needed at most works before 2030 and in some cases before 2025. Below are the dates we currently anticipate additional treatment capacity may be needed for each works, based on estimated build out rates of development that is already committed through planning permission or allocation. Additional information is sought on solutions to address this in the short term.

Sidlesham – 2021/2

Thornham – 2024/5

Pagham – 2024/5

Bosham – 2028/9

Tangmere – 2030/31

Lavant and Chichester both currently have no environmental capacity.

We are also concerned that there are no proposals for the northern part of the Chichester Plan Area as the works there will also need additional capacity:

Loxwood – 2020/21

Kirdford – 2026/7

Wisborough Green 2026/7

We would like to reiterate the urgency of finding solutions so that development can continue across the Chichester Local Plan Area.

Permit reviews must take account of sensitive receptors and ensure no adverse environmental impacts.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(e) I don't know

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

The Council previously commented (on the SEA scoping report in Oct 21), that there should be a separate SEA objective on assessing the impact of options on road transport movement (thinking of tankering as a solution). This was not incorporated into the SEA framework but tankering (along with pumping) is specifically mentioned as a mechanism of impact under the Climatic Factors assessment criteria, there would not be an objection to the SEA in that regard.

The assessment of the construction phase for the Arun and Western streams is 'minor negative' on 9 objectives and 'neutral' on the other 4. Only in operational phase do we see any benefits, and even then, carbon emissions remains as one of only 2 'minor negative' assessment for this phase (defined as an increase in carbon emissions of between 100 and 1,000 tonnes CO<sub>2</sub>e / year). Can anything more be done to mitigate this?

Mitigation will be key in construction phase. The SEA says "Prior to the start of construction impacts on the local community will need to be assessed, noise potential as well as disruption to traffic and public rights of way. Potential receptors include schools, medical facilities, open access areas, green spaces, residential areas." This issue is understated.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

We welcome the longer-term approach to investment planning being taken by the DWMP and the emphasis on catchment based and nature based approaches.

We support all 3 of the DEFRA scenarios relating to storm overflows above.

**What do we need to improve in our DWMP?**

Appreciate this is not within Southern Water's control but it would be better if the plan was able to use more recent data (including on Dry Weather Flow) to help inform the investment required. The use of more historic data means the urgency of the need for improvements to treatment capacity at many of the WwTW is missed.

We have answered disagree to the 1st question under Section 5 because of the concerns highlighted under Section 3 above in relation to Investment Needs. However, we do recognise that not all changes in response to previous consultations have yet been incorporated.

We will continue to liaise with Southern Water to ensure the best information on existing permissions and future plans can feed into the work to identify and deliver infrastructure requirements.

ID 4011

**Organisation**

Medway Council LLFA

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Climate change and the proposed level of development within regions. More development is being proposed within the Flood plain. currently during flood events the system can be overwhelmed. it is likely that this will get worse before better. Significant infrastructure changes re required

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Currently there are issues with some partnership working opportunities between partners. To ensure that this process is efficient this should be a priority

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Water should be dealt with at source with multiple solutions through the management train sought to be used. Ensuring the best quality of water is maintained.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

The most suitable options with the biggest pay off and influence on the public should be invested in

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

I think that more assessment will be needed to ensure that this is feasible, but this should be a future aim to reduce the overall risk.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

Band 0 needs to be the significant approach in the long term. Although any reduction is good, we need to be able to push this as much as possible

ID 4012

**Organisation**  
East Hampshire District Council

**Are you happy to be contacted about your feedback?**  
No

**The main challenges for drainage and wastewater management are identified in the DWMP.**  
(1) Strongly agree

**What do you consider to be the most important future challenges?**  
All are important in different ways.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**  
(1) Strongly agree

**Please explain your answer:**  
It is not just down to the Water Company, it involves permitting (EA), environmental regulations (EA and NE), wildlife trusts, local planning authorities (growth) etc.

**The priorities for future investment should be: My number 1 priority is:**  
Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**  
Enhancing the Environment

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Hard engineering solutions do not necessarily environmental and can be site specific therefore should be considered catchment wide and if possible, nature based solutions.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

It is not about monetary costs it should be about environmental costs too.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Need to consider customer bills alongside everything.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(e) I don't know

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**



ID 4013

**Organisation**

South East Water

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Meeting public expectation.

Achieving nutrient neutrality across the whole area and compliance if restrictions are tightened whilst meeting population growth.

Maintaining/replacing aged assets.

Public behaviour changes to 3 Ps only.

Increase in demand as a result of increased building and run off.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(4) Strongly disagree

**Please explain your answer:**

Other organisations such as highways both England and local council need to take responsibility for road run off.

Developers should ensure no additional run off/water capture system or permeable membranes.

Waste treatment should be retained by wastewater provider not private entities.

Regulators and planning should be firm where further development is not feasible.

We need to understand what is the limit an area can take.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(5) No opinion

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Enhancing Environment has regrettably fallen last, but I believe if 1-3 are tackled this will naturally benefit 4. Road run off being separated I am in two minds over, as this is likely to be difficult and costly and, in some areas, prohibitive due to it more likely being the older parts of towns. Solutions may be additional works, improvements in works capacity and improvements to hydrology but I feel the highways and council should provide funding for their share of wastewater entering the system via this route. It is not just simple separation, road run off needs treatment, control and regulation. It will be very complex to do respectively, but certainly new builds should be dealt with appropriately and not just added to the system. Catchment based and nature-based solutions are preferred where feasible and do not need over engineering. We should still bear in mind there is a limit to land pressure and disposal, and we should know when that limit is reached and protect the environment for the future.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Cost should not be the driver and regulators should support this. Budgets will never cover all needs and so difficult decisions have to be made, but you should be able to show how this decision has been made and the limitations that have made that point be reached.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

This should be the ultimate aim, but I'm not sure how achievable this will be a) if the regulators allow and b) customer affordability.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

I believe the SWS have considered the all-round needs and consulted with stakeholders and understand priorities and limitations and selected the key investment areas.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

The overall all-round approach and optioneering and developing the plans based on stakeholder engagement and internal knowledge.

**What do we need to improve in our DWMP?**

Perhaps think more outside the box. Do you need to build additional works in some areas? Do you need support for regulatory changes? Customer willingness to pay have you identified how much and then sort feedback. Direct developers towards what you really need. Public perception and education and regulatory changes to support things like wet wipes and no flush items.

ID 4014

**Organisation**

West Sussex County Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

**What do you consider to be the most important future challenges?**

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

Please explain the reasons for your answers to questions 4 to 6 above:

Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.

Please explain your answer:

The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase

Please explain your answer:

I support the range and type of investment needs identified in the five Investment Plans

Please explain your answer:

Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?

The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan

(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 4015

**Organisation**

West Sussex County Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Tightening Environmental permits

Nutrient enrichment

Ageing assets and infrastructure

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Mutually beneficial

Includes each other's concerns

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(3) Disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

If engineering approach is easier then that is preferable if more effective

The other answers should be guided foremost by reducing the negative amenity effects for residents

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Best outcome for residents and environment rather than least cost should guide option choice

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(3) Disagree

**Please explain your answer:**

I can only agree once the increase in costs to the customer is known and not before Bands 2 have been reduced to Bands 1. In other words, customers should not be bolstering SW finances prematurely.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

The five plans cover what needs to be done

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

SEA is Objective led as opposed to risk based

Considers cumulative effects

Repeats by River Basin the significant issues across the planning objectives

Provides investment needs summary

And looks at impacts all in one place

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

But: the draft is still quite top level

The task for SW is immense and I doubt it can have the necessary detail ready for OFWAT to assess and agree PR 24 in time for AMP8.

The demand for consultants and qualified contractors to put all this together and prioritise across eleven river basins and their catchments will be a huge effort over many years

**What do we need to improve in our DWMP?**

This consultation should not be a completed event but a continuing process leading to PR24 and the submission to OFWAT in which stakeholders remain involved

ID 4016

**Organisation**

Thames Water

**Are you happy to be contacted about your feedback?**

No

**The main challenges for drainage and wastewater management are identified in the DWMP.**

**What do you consider to be the most important future challenges?**

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

**Catchment wide and nature based solutions should be prioritised over traditional engineering approaches**

Please explain the reasons for your answers to questions 4 to 6 above:

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

Please explain your answer:

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

Please explain your answer:

**I support the range and type of investment needs identified in the five Investment Plans**

Please explain your answer:

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 4017

**Organisation**

Lower Medway Internal Drainage Boards

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Working with others and the context of differing priorities and funding criteria.

Managing flooding and drought.

Proactive rather than reactive asset management.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

This is key to success and although strides have been taken to engage at a strategic level, on a local level this is very challenging and I suspect does depend on the individuals.

Locally we have experienced.

- poor contact on local issues.
- consents not being applied for/works going ahead with no context and the only explanation was a series of poor photos.
- promises to be in contact that are not upheld.
- painfully slow progress on joint projects with little 'expectation setting' and communications along the way.

Solution: Have 'Flood/Partnership' officers at a local level, not just strategic that could work across your planning / development teams / guys/girls on the ground and LLFA's/EA/third parties.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

They should be, but not to the detriment of using traditional hard engineering methods. For any given problem the solutions should be prioritised based on a) wider objectives/impact b) funding availability (and timing) c) risk profile. A balance between local quick win hard engineering solutions vs soft/wider scale solutions.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(3) Disagree

**Please explain your answer:**

There needs to be a balance between the two which will be largely dictated by local and site-specific conditions in the main but of course need to be viewed in a catchment context. It will depend largely on how much time there is to deliver something, and the consequence of not delivering in that time. No organisation just looks at 100% quality or 100% quantity. More innovative solutions may need more time to come to fruition, but there is a danger that SW cost others out of the project by not balancing this with costs. Monitoring of contribution to the various elements (e.g. environmental enhancement) as a % goal rather than an absolute may assist with this.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Maybe review the profits first, and see what needs to give? Again, this needs to be a balance between taking profits and improving the service.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

I agree but there also seems to be sites missing in the Investment Programme which I would expect to see in there. There may be good reason to discount these but not sure?

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It is a very comprehensive document which explains the drivers and reasoning/priority.

**What do we need to improve in our DWMP?**

I know of sites that are vulnerable to foul flooding and which SW recognise as such, but are not listed? May be good reason for this but seems odd.

ID 4018

**Organisation**

Test Valley Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

The DWMP highlights multiple important challenges that need to be considered in parallel, including around protecting the environment and public health, while ensuring infrastructure is resilient and fit for purpose now and into the future. Some of the challenges are more pressing in the shorter term but this does not diminish the need to address these alongside some of those matters that will come into play to a greater degree in the future.

The work undertaken to prepare the draft DWMP, including at level 3, has highlighted the number of challenges within the catchment and specific wastewater systems. In many cases the causes and potential solutions overlap, which highlights the value of considering such challenges collectively.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

We are grateful for the opportunity to have been involved in the preparatory work for the DWMP to date, particularly with catchment scale discussions. This has highlighted the importance of a collaborative approach, both in sharing of knowledge and information and opportunities to work together to support the implementation of some of the identified measures. The role of multiple stakeholders has also been highlighted through other strategies and policies, like the River Basin Management Plans.

The Council would welcome ongoing engagement with Southern Water on this and other matters. We recognise the mutual benefit of such engagement, for example in relation to planning for future population growth and ensuring adequate infrastructure is available to support this without the risk of a detrimental effect to existing customers and the environment and that enables the delivery of the Borough's Local Plan objectives

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

It is challenging to prioritise the future investment areas as they all are important, and it is recognised the investment required to address the identified risks varies. Additionally, there will be variations on the importance of these issues at a more localised level based on the specific impacts they have.

We support opportunities to separate rainwater from foul sewer systems where it is possible to do so as a means of reducing sewer flooding and storm overflows. Similarly, we are supportive of the principle of prioritising nature based solutions, which can have a role in delivering multiple benefits. However, it is recognised that it may not always be possible to reply on such measures or be confident of their effectiveness. There may also be challenges with implementing such measures within existing built-up areas.

There are proposals for the regeneration of Andover town centre and land to the south of Romsey town centre that may present opportunities to introduce additional nature based solutions in the management of rainwater, including through incorporating additional green infrastructure and enhancing the River Anton corridor in this vicinity.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

We would support the prioritisation of best value options in principle; however, note there may be circumstances that mean this may not always be appropriate. For example, if an opportunity arises to co-deliver a project between organisations that may be time sensitive.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

A balance needs to be struck in addressing the identified challenges and ensuring the affordability of bills to customers. It is recognised that a significant scale of investment has been identified as needed to achieve Band 0 in all catchments. This will also need to be considered alongside water resource costs as part of the business planning process. Whilst recognising the timescales under consideration, there are particular, immediate pressures that will also need to be taken into account.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(e) I don't know

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

We are grateful for the opportunity to have been involved in the preparation of the DWMP, particularly the catchment scale discussions. It has also been welcome that local objectives have been considered to reflect specific challenges, such as around nutrient neutrality.

**What do we need to improve in our DWMP?**

In relation to the Investment Plan for the Environment, it would also be helpful if a nutrient budget study / investigation and the associated works were undertaken in relation to the River Itchen SAC in addition to the designations already identified.

ID 4019

**Organisation**

Surrey County Council Flood and Climate Resilience Team  
as LLFA

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

We consider the two most important challenges are “Changing climate” and “population growth”. The other 10 challenges are largely a result of these two challenges.

Can the last part of challenge 1 be updated to include “drought” i.e. “.....and the environment are not affected by flooding, pollution or drought”.

There may be solutions that meet both or a number of challenges.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Management of water falls to a group of RMAs with a varying degree of responsibility and statutory duties. Effective and efficient management will require collaboration and coordination. This can be done at the catchment level through a joint project board that coordinates works.

Through the planning process there is an opportunity to improve consultations on developments including minors and encourage developer led improvements?

Collaboration can contribute with aligning project funding to improve management of drainage and wastewater and additional benefits.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q.4 Improving the existing system first probably makes sense. This will then hopefully improve quality, pollution and flooding including storm overflows. A holistic catchment view of the whole system is needed including continued investment across all areas.

Q.5 Ideally separating the systems is the preferred solution. If rainfall events do exceed sewer capacity then flooding of just water is preferable to foul flooding. More consideration can then be carried out to manage surface water. Adoption and maintenance of SuDS systems by water companies could achieve this.

Q.6 The prioritisation of approaches depends on the location. Again, a holistic integrated catchment approach is needed. How does the funding of nature based solutions fit with long term maintenance?

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Again, a risk based & holistic catchment approach will allow prioritised “best value” options. This should also include alignment with other strategies in order to deliver partner RMA strategy and project objectives.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

This depends on other factors. Will affordability come into this? How will this be funded?

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

The 5 plans include SuDS. Can the plans include provision for future maintenance of SuDS by the water companies.

The investment needs section doesn't list of the 5 investment plans but includes a link to the plans on the website. Can the list be added to the main text?

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

The draft plans have adapted to include the Government's Storm Overflow management plan. Has this changed the priority of storm overflows within the DWMP?

We acknowledge the use of SuDS and NFM / nature-based solutions within the DWMP. The challenge will be how these are included within projects and wider infrastructure programmes. What maintenance regime will be put in place for the SuDS and nature-based solutions and who will have responsibility for this.

**What do we need to improve in our DWMP?**

The following includes a list of possible improvements:

- To put in place a "reserve fund" for ad hoc projects.
- To increase joint working at the local level (works, maintenance and enquiries) in order to improve delivery of projects.
- To include IDB engagement on Medway in the Surrey area.
- To review how to link flood risk mitigation / reduction, maintenance, investment / SuDS and water resources workstreams internally and externally.
- To look at methods on alignment with planning.
- Needs direct links to local and national highways in order to coordinate works.
- To look at ways to integrate drainage and wastewater management as part of upgrades and delivery of new infrastructure projects.
- The 5 investment plans are in a table format. Can this be displayed as a map? A map display would allow other RMAs to overlap their project areas and make it easier to see where the investments are being prioritised. It appears that in the 5

plans there are no allocated investment costings for any locations in Surrey. Can you confirm.

ID 4020

**Organisation**

Swale Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Ensuring the infrastructure to support and maintain sustainable water quality and quantity is identified and delivered at the appropriate rate to support the health and wellbeing of our communities.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

Southern Water should continue to collaborate with other organisations with responsibility for water and protection of the environment to improve the management of drainage and wastewater but not lose sight of the fact it is their primary responsibility.

**The priorities for future investment should be: My number 1 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

This question is not specific enough to answer properly. It could be interpreted that pumping raw sewerage into the rivers and sea is a "nature-based solution".

However, in the right context, nature based solutions are more likely to have wider sustainability and environmental benefits and could be likely to require lower levels of intervention and maintenance.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Southern Water should be taking a longer-term view on their approach that delivers best value and reduces risk overall.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

This is a priority, but the profits should be impacted and not customer bills because investment should be funded from profits

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

Investment needs to be delivered more quickly to secure a network that is fit for purpose

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Infrastructure requirements set out but there are concerns about the resources available to ensure the timely delivery of the items identified.

**What do we need to improve in our DWMP?**

Set out the commitment to resource the investment identified

ID 4021

**Organisation**

Chichester District Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

The only three challenges listed that I consider LESS important than the others are 6 (persistent biologically active chemicals), 5 (microplastics) and 9 (carbon). All the other 9 challenges are equally important challenges.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Southern Water cannot possibly solve so many problems on its own. It needs to work with flood risk management authorities, LPAs, neighbouring water companies (for supply as well as sewage) and organisations that protect the environment.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Catchment-wide and nature-based solutions are more durable and effective, even more readily accepted by the public, than artificially engineered solutions, even though the processes might be slower. There is still a place for engineered solutions.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Least value costs tend to be short-lived and need replacement.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Many of the issues in our River Based Catchment are already Band 2 and significant investment would be needed to get to Band 0. However, I consider that water is an under-valued and underpriced utility and the public have greater respect for something they pay more for. However, this is not a very good time to raise customer bills!

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

A detailed analysis has been carried out, treating all WWTW on an equal basis. I welcome the short/medium/long term horizons for the investment planning and the prioritisation score shows far too many Reference Prioritisation Scores below 0.00 and therefore unlikely to happen unless funding is increased during the remainder of my lifetime. I like the catchment solutions and nature-based approaches.

I like the progress that has already started with the 5 projects over the next 2 years, looking at ways to evaluate the most effective ways of reducing Storm Overflows. Personally, I hope that SW tackle the root causes of the problems: blockages caused by customer education eg wet wipes; separate the sewer and surface waters that causes hydraulic overload from roofs and roads; increase the use of SUDs and permeable surfaces, but use the engineering solutions of storage tanks and additional treatments as the last resort. Increasing the EA Permit to solve the real Q90 values that exceed the Permit number, does not solve the issue of under-capacity of the WWTW.

### **What do we need to improve in our DWMP?**

Please make the outline and stages simpler to follow and help the reader find what he is looking for. I used different colours for each of the WWTW in our District, onto the 'Prioritised Investment Needs Identified for All Planning Objectives' and then transferred the Prioritisation Scores onto the Individual 'DWMP Investment Needs sheets'. Only then did I discover that only half the items on my local WWTW sheet had any chance of being implemented (ie a score above 0.00). Blinded by statistics and obfuscation!

As an LPA, all we need to know with certainty, is that the WWTWs in our District have current and future capacity to cope with the demands of our pending Local Plan Review. As individuals, all we need to know is that CSOs will be ultimately be engineered out of existence and that local bathing waters plus the sea will be safe to swim in after rainfall. We are fast becoming a third-world country.

ID 4022

**Organisation**

Ashford Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

The Council considers that all the challenges within the DWMP are important, however the Council would like to highlight nutrient neutrality and planned housing/population growth as factors that are most important to the Council, in its role as a Local Planning Authority.

The nutrient neutrality issue is having a significant impact on the delivery of housing which has been sustainably planned through the Local Plan. As a significant portion of Ashford borough is covered by the nutrient neutrality requirement, it is causing impacts on the distribution of housing. Areas outside the catchment are seeing an increase in levels of development, as they do not need to demonstrate nutrient neutrality and therefore are more vulnerable to greater levels of development to 'overcompensate'. These levels of growth are not consistent with the Council's housing strategy, as this additional growth can directly and indirectly generate other negative impacts, such as pressure on the existing drainage system. This in turn leads to other impacts such as sewer flooding and groundwater pollution. It is therefore important to the Council to deliver a strategic response to nutrient neutrality, with assistance from Southern Water, to help alleviate the nutrient neutrality challenge and help sustainably planned housing growth to continue to be delivered within the borough.

The Council also agrees that housing/population growth is a challenge for managing wastewater sustainably. As the DWMP highlights, 'there is a need to continue to work closely with local planning authorities to build a greater understanding of growth risks and needs in the medium to long term'. This close collaboration will be valuable to ensure that growth within the borough can be sustainably accommodated into the drainage network. This includes future planning, through Local Plans. Additionally, the collaboration will help to ensure that any future additions, extensions, or improvements to the sewer network can therefore be planned timely and taken forward in tandem with new growth within the borough. This will then help to mitigate the impact of development growth on the existing drainage and wastewater systems – which will help to address some of the other challenges identified in the DWMP.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The Council agrees that it is important for Southern Water to work with the other organisations that have responsibility for water and the protection of the environment. For example, with regards to nutrient neutrality, the Council is working in collaboration with Southern Water in order to progress a strategic response to this issue. The Council considers that it is important that infrastructure, such as drainage and wastewater services, are planned and delivered through a strategic approach. This is to ensure that the housing growth within Ashford borough can continue, but without having a significant adverse impact on the environmental quality of the water resources within the area. The collaboration with Southern Water may also generate other secondary benefits for some of the other challenges and risks identified in the DWMP, such as sewer overflows and water quality. Any collaboration must ensure that future development and growth can be planned holistically, to ensure that growth within the borough is sustainable, including for drainage and wastewater management.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(5) No opinion

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

Question (5) explanation

The Council is neutral on whether surface wastewater should be separated from foul water. There would need to be further investigation about the impacts that this process would have on design and future development if the two types of wastewaters are dealt through separate systems, including whether additional infrastructure is needed and the timescales for delivery and implementation. It is noted that by separating these two types of wastewaters it will reduce the pressure on the wastewater networks and help to reduce the frequency of sewer flooding and storm overflows. Further information is required for the Council to make a judgement on this issue, as it could have larger implications for the Council's role as a Local Planning Authority and the impact that this could have on development growth within the borough.

Question (6) explanation

The Council has expressed a neutral opinion on this question as there are both positives and negatives towards the balance of catchment wide/nature based solutions compared to traditional engineering approaches. The Council considers that a mixture of approaches are required, and therefore a case-by-case approach should be taken on each type of solution to assess the cost-effectiveness and any secondary benefits that can be generated from such solutions.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Case by case assessment of the benefits generated from each of the solutions should be undertaken. Schemes which have multiple benefits can help towards strategically addressing the issues generated by drainage and wastewater. Therefore, there may be schemes which provide a range of benefits, which can in turn generate further benefits. In these circumstances, it may be more suitable to prioritise these schemes over those schemes which are lower in cost.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

The Council considers that there needs to be a robust justification for the solutions introduced by Southern Water in order to address drainage and wastewater risks. It is clear that some solutions are more effective at reducing wastewater risk than others, and therefore it is important that the best value approach is taken to minimise environmental impacts whilst ensuring the costs on customers does not significantly increase.

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

The Council notes that there are few investment opportunities identified within the borough of Ashford. It would be useful if the investment areas could be highlighted on a map to show the spatial distribution of the investment opportunities identified in the Investment Plans. This will help to identify if there are projects located upstream or downstream of the borough, which could have secondary benefits, which would help to inform the Council's opinion of investment projects identified.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 4023

**Organisation**

West Sussex County Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(3) Disagree

**What do you consider to be the most important future challenges?**

The focus of human settlement throughout West Sussex is the coastal floodplain. Much of the surface water drainage is reliant upon gravity outfalls to the sea or to estuaries. These outfalls are subject to tide-locking that creates backwater in the drainage network contributing to the risk of surface water flooding. This is a particularly over winter months when surcharged surface water drainage networks coinciding with significant storm events results in surface water flooding and inundation in the foul sewer system. This problem is going to be exacerbated with predicted sea-level rise that is forecast to increase between 2000 (baseline) and 2125 of between 1.2 and 1.6m. This problem has been identified and discussed in the DWMP workshops but does not currently feature in the 'Investment Needs' documents. Upgrading sewerage infrastructure to take into consideration tide-locking associated with sea level rise is a major challenge that has not been clearly identified in the DWMP documentation.

It is also suggested that specific reference is made to the fact that the south east region is under serious water stress and that there is currently a moratorium on development within North West Sussex due to the environmental impact of groundwater abstraction at Pulborough, and the negative impact this is likely having on the integrity of designated sites including Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site. Although it is referred to elsewhere in the DWMP, it should be referred to as an important challenge as a reduction in water demand would also impact on drainage and wastewater management as water resources should be planned and managed in an integrated way.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

A collaborative approach is essential as drainage and wastewater management and environmental protection are intrinsically linked to each other. Improvements can only be achieved through an integrated approach to water planning and management as many of the issues will be the same for each catchment. Collaboration between West Sussex County Council and Southern Water to improve management of drainage and wastewater needs to recognise the significant differential in financial resources between the sewerage undertaker that derives revenue for maintenance and upgrade of sewerage infrastructure and West Sussex County Council that currently has no similar source of revenue outside of commuted sums for newly developed drainage infrastructure associated with new roads.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(3) Disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q4. It is difficult to prioritise one issue over another as they are all important and will have direct and indirect impacts on each other. For example, addressing sewer condition and groundwater pollution will help to address wastewater compliance and pollution, sewer flooding and enhancing the environment.

Q5. The DWMP should be aiming to maximise surface water separation from foul water separation. West Sussex County Council support the introduction of Government policies and tightening of building regulations to achieve this as it will have a positive impact on drainage and wastewater infrastructure.

Q6. WSCC support nature-based solutions and a joined-up approach by aligning with drainage and wastewater management plans and flood risk management plans, however, this should be pursued alongside traditional engineered upgrades to sewerage infrastructure which has experienced severe underinvestment. Nature based solutions should be aligned with Local Nature Recovery Strategies and could be used to contribute to off-site Biodiversity Net Gain requirements.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

The DWMP should aim to address all planning objectives rather than the least cost. A least cost approach is likely to focus on short-term fixes that do not address the underlying issues rather than target large scale strategic investment that is needed to effect changes in drainage infrastructure.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

No comment

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

No comment. See response to Question 1.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

For the first time there is transparency of the scale of problems and environmental risks associated with the drainage and wastewater infrastructure that Southern Water is responsible for maintaining. The BRAVA assessment places this information in the public domain highlighting for the medium term 2050.

Overall, WSCC is supportive of the emerging plan and the need to tackle drainage and wastewater infrastructure as there are acute problems within the county. WSCC strongly support the approach to tackling water management in an integrated way particularly given the link between issues such as water efficiency and wastewater.

**What do we need to improve in our DWMP?**

The consultation questions were difficult to follow as they were not numbered. It would be helpful to see the consultation questions ahead of the completing the online response form, perhaps integrated into the document to help stakeholders form their responses while reading the document.

There should be greater focus on the opportunities to align with Local Nature Recovery Strategies and the potential for schemes to address drainage and wastewater management to contribute to Biodiversity Net Gain for developments to meet their requirements off site.

ID 4024

**Organisation**

Sussex Wildlife Trust (SWT)

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

We understand the focus on the future, particularly due to climate change, however there should be more acknowledgement that the current system is failing and has been for years. Page 10 of the plan states 'we need to start investing now for the future', however Southern Water also need to invest to rectify the chronic lack of investment in previous years. Similarly, this plan should not just be about 'protecting and enhancing the environment', it needs to be about restoring past damage, particularly to sites designated for their biodiversity value, which seem to have been undervalued in the plan. In particular, there appears to be little consideration of SSSIs and MCZs.

Whilst we support the additional objective of reaching Good Ecological Status, as mentioned later in this response, most of the planned investments do not appear to directly relate to this objective. SWT would like to see an objective that considers the risk of assets and operations contributing to existing failures within designated sites and of priority habitats.

The plan needs to acknowledge that we are already facing unacceptable impacts on the environment; this is not just a challenge for the future, but the reality now. As such, any solutions to these challenges need to benefit the environment with investment focused on interventions that bring multiple benefits and are future proofed. We encourage Southern Water to pursue nature-based solutions, working with Catchment Partnerships wherever possible to enable integrated catchment management.

Overall, we see the most important challenge being climate change, which will affect all of the other 11 issues listed and the solutions to these. For example, we note that larger storage tanks are being proposed for some coastal locations, but it is not clear if sea level rises and the likelihood of this resulting in tide-locking of outflows has been fully considered. Similarly, the plan recognises ageing assets and infrastructure, but not the location of infrastructure in coastal areas, which will likely be vulnerable to coastal erosion and flooding in the future

However, all the challenges are important and Southern Water should be seeking solutions that bring multiple benefits across multiple challenges.

SWT would like a challenge included in relation to Water Companies abilities to influence other sectors such as planning and agriculture. Southern Water have acknowledged repeatedly in its consultation that one of the major issues for sewage overflows is rainwater entering the system and that it needs to focus on a catchment based approach and greening the grey to help reduce this problem. However, in the large part this involves working at scale, on land in other people's ownership and in situations where Southern Water has no statutory or legal powers. SWT believe this is a significant challenge that has not been properly reflected in this section of the plan.

It is clear that Southern Water realise this, because frustratingly, the vast majority of interventions in the investment plan involve hard engineering and not any of the innovative nature-based solutions highlighted in the various consultation

sessions.

We see that nutrient enrichment is listed as challenge 4. Since the publication of the draft DWMP, the government has announced further requirements for Water Companies to upgrade treatment works in areas where nutrient neutrality is required. How will this requirement be integrated into the DWMP? Will it impact the investment plans?

Challenge 6 should acknowledge that none of the rivers in England are classed as having good chemical status by the Environment Agency. E.g. <https://theriverstrust.org/about-us/news/new-ea-water-quality-statistics-show-failure-at-a-national-scale>.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

As discussed above under Challenges, it is vital that Southern Water collaborate across sectors. However, it is not just about those that have responsibilities for water and protection of the environment, but also those that have the biggest impact on these things. Southern Water needs to work with businesses, the agricultural sector and vitally, local planning authorities to address fundamental issues with our drainage and wastewater systems.

Southern Water must also proactively work with organisations working to solve similar problems, such as those giving environmental advice to landowners. There seems to be some area of the county with many different organisations giving the same landowners slightly different advice. This needs rationalising through regular communication and collaboration.

We are concerned about the collaboration and communication within Southern Water. In our experience, there is excellent expertise within the company on the catchment-wide approach, nature-based solutions and environmental benefits. However, we do not always see this expertise reflected in Southern Water's day to day operations or the policies and strategies emerging from the company. For example, despite a repeated commitment from the staff members running the consultation events for the DWMP to a catchment-based approach, it appears very little innovation is actually committed to in this plan.

We are concerned about the level of collaboration with communities. To date, there appears to have been very little publicity about the DWMP or the live consultation to the wider public. Similarly, the conclusion from Customer Engagement that they 'think it is sufficient to know that there is a DWMP and to leave the detail to Southern Water and relevant agencies' is concerning.

In general, there needs to be better awareness from customers of how their behaviours impact water resources and wastewater. For example, the importance of slowing the flow of rainwater into drains and what substances causes blockages when put down sinks and toilets. Wastewater management is clearly an important issue to many people, this is most apparent in the outrage from the public when there are repeated sewage discharges into rivers and beaches (e.g. August 2022). If customers and communities are not interested in the DWMP, we see this as a failure by Southern Water to engage them in a meaningful way.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

SWT is concerned about the approach of ranking options in question 4. The priority for investment should be restoring the damage to the environment caused by past investment decisions. We also question the appropriateness of listing Wastewater Compliance as an option. There should be a basic level of investment from Southern Water to ensure legal compliance across the network. This is not a 'nice to have', but really, the most basic level at which the company should be operating. Therefore, we have chosen not to rank the remaining options. The priorities in question 4 need addressing in tandem, ensuring gains to the environment in all cases.

We strongly support the separation of rainwater in question 5 and the prioritisation of catchment wide and nature based solutions in question 6. Southern Water have highlighted that around 80% of the water in sewers during a storm is rainwater and therefore this is an obvious focus for improvement. We strongly encourage Southern Water to work collaboratively to influence decision makers when it comes to decisions on sustainable drainage systems and particularly retrofitting solutions. Water companies should be collectively lobbying government for greater powers when it comes to land use planning and particularly the decisions around new housing and infrastructure.

Sussex Wildlife Trust has demonstrated through the Sussex Flow Initiative and previous incarnations of this project, that nature-based solutions can make a big difference to flooding, water quality and quantity. Catchment based approaches are the most obvious way to ensure multiple benefits across objectives are delivered and that Southern Water actively contributes to restoring nature. This absolutely should be the priority for the plan.

It was Sussex Wildlife Trust's understanding from the conversations and presentations throughout the consultation events that nature-based solutions and 'greening the grey' were being focused on in the DWMP. However, now we have seen a draft plan, we are disappointed in the content. It appears that the investments in the plan focus very much on engineering solutions rather than anything innovative. This is despite there being very detailed information about the benefit of alternative approaches in the wording of the level 1 plan. It is not at all clear why this has not been translated into the investment plans. There seems to be a complete mismatch in what the plan says on pages 22 – 64 and what is being committed to through the five investment plans. This should be explained.

Overall, we would encourage much more investment into nature-based solutions at a catchment wide level.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

The Sussex Wildlife Trust agrees that Southern Water should be selecting options that deliver wider multiple benefits across many planning objectives. However, looking at the Investment Plans, it seems like some planning objectives have been prioritised over others. For example, it does not seem like achieving Good Ecological Status has been prioritised, despite this objective being specifically asked for by consultees.

We understand that investments on different objectives might also result in wider environmental benefits such as GES, but there is little information about how these wider benefits might be measured or monitored and therefore little certainty provided.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

The overall objective for Southern Water should of course be to get to Band 0 for all objectives. The company should be going beyond the minimum legal compliance and delivering a wastewater system that meets the needs of society and protects a restored environment. To have confidence in your ambition of investing in the future, we would expect to see you clearly communicate the level of investment required annually to keep moving your infrastructure towards Band 0 and maintaining the improvements made, within a changing climate.

It is not for Sussex Wildlife Trust to comment on the appropriate level for customer's bills, but we do not think it is correct to imply that reducing risks to Band 0 will automatically result in bill increases. Other mechanisms for funding should be considered. For example, the plan should present what the £20billion looks like when compared to the historic profits of the company. For example, what percentage of profits should have been invested annually to maintain infrastructure and meet legal obligations?

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

As mentioned previously, we do not think that the types of interventions listed in the Investment Plans reflect the presentations in the consultation sessions or in the rest of the plan. The majority appear to be focused on hard engineering rather than catchment wide nature-based solutions that we thought Southern Water were advocating.

In general, the Investment Plans are very hard to navigate, being word documents that cannot be sorted into catchment, intervention type or objective. There is little explanation of the summary tables and tables contain different information. For example, the Prioritised Investment Needs Summary Table Identified for Annualised Flood Risk (PO7) (Investment Plan for Sewer Flooding, Annex B) shows a risk band for 2020 and a risk band for 2050. However, it is not clear if the risk band for 2050 is with or without the intervention proposed. We assume without, as otherwise many of the interventions result in an increased risk band in the future, which surely is not a good use of resources. In contrast, the Prioritised Investment Needs Summary Table Identified for Good Ecological Status / Potential (PO9) (Investment Plan for the Environment, Annex A) includes a column on 'Band Reduction Achieved', however these show figures with decimal points rather than whole band figures, so it is not clear if this is just the reduction or the ultimate band figure.

It appears that the proposed storage tanks for many of the sewage catchments are based on 1 in 50 year floods. We assume this is due to the objective being set by national guidance, but it seems very short sighted. Most plans and projects look at 1 in 200 year floods as a minimum. We would think that Southern Water would want to future proof any investment made to ensure their resources are being used efficiently.

Sussex Wildlife Trust also question the sewage catchment selection. It concerns us that most of the interventions occur in coastal areas at the end of river catchments. In general, catchment-based work focusses in the headwaters as this usually has the biggest impact downstream. Of course, this is not always the case, but it is not clear how the effectiveness of interventions has been assessed. It is also apparent that sites designated for their biodiversity value have not been prioritised, even though there are several in Sussex where Southern Water operations are having negative impacts. As custodians of protected sites in Sussex, we are keen that the impacts of these proposed interventions address the relationship between water flow and water quality and their subsequent impact on favourable condition. In particular, we are concerned about the treatment works at Coldwaltham that discharge directly into Waltham Brooks SSSI and Arun Valley SPA/SAC. Similarly, the treatment works at Hailsham which impact the Pevensy Levels SAC. We believe there should be further consideration of sewage catchments that directly impact on designated sites.

We understand this was process driven, but we do not have confidence with the BRAVA methodologies that informed this process. We particularly question the catchments listed as band 0 for GES and do not think this reflects reality. We understand that this has been driven by EA guidance on the primary cause of the catchment's failure to meet GES. However, we believe that if Southern Water's operations are contributing to the problem, this should be addressed, regardless of the proportion of impact. Overall, we found the BRAVA methodologies quite unintelligible and confusing to follow. We feel that the process of choosing catchments for interventions has been done in such a complex way that it is not transparent or easy to navigate. Similarly, it is not clear how the options appraisal has worked.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

The baseline information set out in the SEA via the Scoping Report and its appendix C is extremely high level and therefore we are not clear of the value or purpose of it. This is concerning given many of the sites are in unfavourable condition and some of this is partially down to Southern Water activities, such as in the Arun Valley and Chichester Harbour. The baseline should set out the damaged state of our existing riparian, coastal and marine habitats, with the DWMP aiming to restore and rectify the previous harm done.

It is not clear how many of the Generic Option Categories are actually being delivered by the DWMP and therefore their relevance to the SEA. For example, Table 4 lists a generic option of 'control/reduce surface water runoff: natural flood management, rural land management, SuDS, blue-green infrastructure', but the majority of the interventions in the Investment Plans involve hard engineering.

Sussex Wildlife Trust would like to see the SEA comparing alternative intervention types, which does not appear to have happened. For example, an intervention using a nature-based solution is likely to achieve more biodiversity and climate change benefit than installing a larger storage tank. It is clear that Southern Water want to move to more catchment wide interventions, and we would hope that the SEA would help justify this.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

Sussex Wildlife Trust strongly supports the creation of a DWMP and appreciate that Southern Water have attempted to engage meaningfully with stakeholders throughout the process. We are pleased that there is a clear recognition that there needs to be urgent investment into wastewater systems and that Southern Water want to focus on Catchment based approaches, collaboration & partnership, grey to green and innovation & technology. We strongly support these proposals.

### **What do we need to improve in our DWMP?**

In relation to the question on the previous page about Defra considering changing the requirements on water companies to address storm overflows (no text box above) – Sussex Wildlife Trust thinks storm overflows should only be discharged in truly extreme conditions, taking account of climate change. 10 spills a year in each catchment is still too many.

Overall, the consultation seems more focussed on process rather than outcomes. The questions in this survey should be asking will this plan achieve the outcomes needed? The areas we have been asked to comment on seem limited. Similarly, the volume and complexity of documentation and maps is very hard to navigate and is not user friendly. For example, the investment plans cannot be sorted or interrogated. We would have liked to see a more interactive representation of the sewage catchments' geography and the potential investment options.

As stated previously, Sussex Wildlife Trust does not think that plan focuses enough on the environment and particularly restoring past damage. However, our biggest concern is that the very positive ideas around catchment wide nature based solutions and greening the grey do not appear to be prioritised for delivery in this plan. We do not think it is appropriate to wait until the next cycle of the DWMP to implement these projects and it is not clear if they will be delivered through other mechanisms.

We understand that some of this work may be happening through different work streams or as part of the WRMP or business plan. If this is the case, this needs to be made explicit. It is not clear to us how the DWMP fits with the other plans and projects being delivered by Southern Water.

As stated in the questions for section 3 we question the BRAVA methodologies and are not clear that all of the correct sewer catchments have been prioritised for action. It is also not clear how the options have been selected through the options appraisal or what some of the interventions actually entail.

ID 4025

**Organisation**

Thanet District Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

See other comments

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The commitment to joint working with other relevant organisations is welcomed, as is the commitment to continuing appropriate public engagement (p16 of the draft Plan).

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

TDC welcomes the recognition of the serious issues caused by sewer flooding and sewage release during heavy rainfall events, and the impact that has on the wider environment (Planning Objective PO5). The Council welcomes the measures proposed by SW in this respect; in particular, in relation to rainwater separation, the prioritised removal of existing surface water connections from the combined sewer network.

The Council acknowledges that Thanet is not unique in experiencing these problems (as is set out in the DWMP and Investment Plan), but would request SW to consider giving Thanet a higher priority in the proposed Investment Plan, for three reasons:

1. Thanet has the second highest population density in Kent (after Dartford) (source: <http://webdefence.global.blackspider.com>), and is also subject to high growth pressures over the next 10-15 years
2. Virtually the entire Thanet coast is identified as SSSI/SPA/SAC/Ramsar, possessing key habitats for significant wild bird populations. This means that the impact of sewage releases into the environment can be particularly high for the designated interests of those areas; and
3. Tourism is a vital industry for Thanet, with the highest proportion of tourism enterprises in Kent (in the top 20% of districts in England) and is responsible for 4.4% of the District's GVA (the highest in Kent, and higher than the SE and England averages). The tourism sector employs some 8,664 people in Thanet (20% of the workforce). Thanet's visitor economy was valued at £352 million in 2019 (Pre-Covid), after welcoming 4.6 million visitors in 2019.

Every release of sewage into the environment is damaging to both tourism activity and businesses at the time of the incident, and to the longer term reputation of tourism in the area.

Sources: <http://webdefence.global.blackspider.com>

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

The Council agrees with the identified Planning Objectives.

The Council is aware of measures already undertaken by SWS, and supports the Margate Pathfinder project set up through the Storm Overflows Task Force.

Nutrient neutrality - the Council supports the aim to achieve nutrient neutrality (p57) and the continued working with Kent Authorities to achieve this. The Council also notes the conclusion (p60) that "separation of rain water from the sewage system is advantageous for nutrient removal".

Pollution of groundwater - the Council supports the work being undertaken to reduce the pollution of groundwater and the chalk aquifer (p33). The Thanet Local Plan contains a policy (SE04), that seeks to protect vulnerable resources in the district.

**What do we need to improve in our DWMP?**

See other comments

ID 4026

**Organisation**

Hastings Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

For Hastings Borough (referred to as “Hastings” hereafter), there are a number of challenges that must be urgently addressed. These are:

Aging sewer system, subject to saline inundation in stochastic storm events (Identified in DWMP);

Management of surface water (partially identified in DWMP);

Bathing water quality (identified in DWMP);

Increasing water scarcity (partially identified in DWMP).

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

This should also extend to working more closely with developers. There are a range of bodies with varying levels of responsibility for management of drainage and wastewater to some extent and close partnership working is essential in order to avoid duplication and seek best value for money.

The proposals within the Levelling Up and Regeneration Bill will place a statutory duty upon utilities providers to work more closely with local planning authorities, including during the local plan making process and for individual planning applications.

With this in mind, there may be some missed opportunities within the DWMP for collaboration with Hastings Borough Council including, but not limited to:

- The pilot urban greening programmes being delivered under the Town's Fund capital programme, which will seek to better manage surface water in known areas with a high risk of flooding from all sources.
- Detailed contributions to the Infrastructure Delivery Plan for the emerging Local Plan up to 2039, including site specific design guidance for sites with critical drainage problems.
- Early involvement through joint working protocols in regeneration activities.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 4 priority is:**

Wastewater Compliance and Pollution

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q4: Please note the online version of Q4 differs from the downloadable response form. The downloadable response form includes 5 priorities. Our Number 1 priority is 'storm overflows' which is missing from the online form, and our 5th priority is 'Enhancing the Environment'. As a coastal region with critical drainage problems which is reliant on tourism (including access to clean bathing water) and with an active fishing fleet whose commerce includes access to shellfish populations, storm overflows and preventing discharge of untreated sewerage into local rivers and seas is a critical issue- as further prioritised through a council motion in July 2022. However, it should be noted that a 1-5 ranking is a challenge as none of the categories are mutually exclusive and controlling surface water further upstream will impact significantly upon this issue. The council is in the process of developing a green and blue infrastructure study and the recommendations coming out of this should be taken on board.

Q5: See answer to question 4 above. Surface water capture and storage/ gradual release/ separation is key to maintaining sea water quality.

Q6: The ideal solution based on the local surface water management plan and best practice nationally and internationally suggests a mix of grey-green solutions will provide the best possible results. This is already reflected well in the DWMP.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Interventions should provide best value in all cases. However, the current investment plans detail costs for the “lowest cost” and not the “preferred” option in many cases. This does not appear to reflect best value.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Whilst we agree that risks should be reduced and investment in this area is vital, we do not agree that this should be passed on to Southern Water's customers. Hastings is a deprived seaside town, the most deprived town in the southeast and the second most deprived seaside resort in the country, and we cannot support any suggestion that customers' bills should rise further. The cost of living for Hastings' residents is a key concern for Hastings Council.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

Survey and replacement/ repair of the entirety of the sewer between Galley Hill- Bulverhythe has been omitted and improving the condition and capacity is critical. The TN34 3 postcode has been identified as one of the worst for "fatbergs" and disposal of non-sewer items into wastewater but is not listed as an educational intervention area.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(b) Protecting public health in designated bathing waters

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

The Pevensey Levels and Cuckmere catchment appears to be deriving very little tangible benefit from the proposed interventions – the majority is potential as opposed to likely or major. Could more be done to increase to "likely"?

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

### What did you like about our DWMP?

### What do we need to improve in our DWMP?

Please note the downloadable version of the response form differs from this online version. Please see my response at Q4. And here in relation Q11 we are being asked to select policy scenarios(s) we support but only one is allowed online. We would like to confirm support for 3 scenarios - (i) Protecting the environment, (ii) Protecting public health in designated bathing waters and (iii) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere.

The Plan lacks ambition – for the most part it seeks to maintain things as they are. We need to see greater ambition to changing the status quo, which as recent events have proven is broken.

Specific points:

We would like to see Smart Sponges used as a method for purifying stormwater (Smart Sponge® | oil filtration & pathogen removal system (naylor.co.uk)

Q4 Hard to prioritise here, as we consider these priorities to be interconnected and should be considered as integrated rather than separate entities

Re Q9a and Q11 We query whether the investment levels cited in the draft is actually enough.

Re Storm overflow investment plan - Again we query the proposed investment levels in storm overfall for Hastings & Bexhill (£1,000K) and major urban area, in comparison with the rural settle of Fairlight which will receive the same amount.

Q11, p69 of Level 1 DWMP states investment for wastewater between now and 2050 is estimated to be somewhere between £8bn and £20bn, while page 4 of the summary report says wastewater investment will be £2.6bn over the next 25 years. This is confusing, can it be clarified?

We note the draft Plan states: "Our Storm Overflows Task Force will be reporting in Summer 2022 so we can update our DWMP before the final publication in March 2023". When will this learning be applied to Hastings issues?

And we also note: "We cannot deliver rainwater separation on our own. Collaborations with the EA, Councils, Planning Authorities, Highways Agencies and local communities are needed to co-create the solutions. Our DWMP is a long-term plan and, by working together, the issue can be tackled, step by step. Every separation scheme is progress towards this long-term goal"

We acknowledge the importance of rainwater separation and hope that Hastings can be targeted early in respect of known vulnerabilities.

ID 4027

**Organisation**

Historic England

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(5) No opinion

**What do you consider to be the most important future challenges?**

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(2) Agree

**Please explain your answer:**

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(5) No opinion

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

Historic England recommends the collection and assessment of specific baseline information which could include identifying the potential for buried, waterlogged archaeological and palaeoenvironmental remains of significant interest and fragility that can be associated with river valleys, floodplains, estuaries, coastal and wetland areas. In particular this exercise should take account of areas of archaeological importance and the potential for unrecorded archaeology (NPPF para.139) and seek to establish the following:

\* the significance of the archaeological remains?

\* its condition, the burial environment and state of preservation?

\* the likely impact of development activity (e.g. potential removal or dewatering from the proposed scheme) on that significance and state of preservation?

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

ID 4028

**Organisation**

Tunbridge Wells Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Climate change (1) and population growth (2) impose significant change so dealing with ageing assets and infrastructure (10) and tightening environmental permits (3) to protect important habitats are considered to be the most important future challenges

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Collaboration allows a range of interconnected and wider issues and any risks to be identified, data and information to be shared, as well as a collaborative approach to finding solutions – which should lead to better quality outcomes all round. Collaboration should also involve local Councils who are responsible for developing Local Plans for their areas so that solutions can be considered proactively in line with long term development strategies for an area.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(3) Disagree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q4. These are all important issues and therefore difficult to prioritise but, in this case, have been prioritised in terms of the risks and problems identified for catchments which fall within the Tunbridge Wells area (Tunbridge Wells North, Tunbridge Wells South, Paddock Wood and Horsmonden) within the Medway Basin.

Q5. Strongly agree as storm overflows are problematic in localised areas of the Tunbridge Wells catchment e.g. Horsmonden and Tunbridge Wells South (The Pantiles area) as discussed at previous DWMP workshops.

Q6. Nature based solutions should be encouraged as much as possible and Figure 11 on page 50 of the Plan shows that this can be successful. However, it is considered that a combined natural and traditional engineering approach e.g. increased storage tank capacity is needed to provide the right balance and maximise overall impact. Retrofitting natural solutions may also be restrained in some areas depending on site context.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Not investing enough now may lead to more problems in the longer term.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

Again, customers may have a bigger price to pay (more problems) in the long term if the required investment is not made now for the future. It is important that other methods of funding should be explored in advance of passing costs to customers, particularly during the current economic climate.

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

TWBC very much welcomes the proposed funding and investment for Tunbridge Wells North and South, Paddock Wood and Horsmonden.

TWBC generally supports the range and types of investment needs for Tunbridge Wells North and South and Horsmonden, but has concerns about Paddock Wood as set out in our previous response following the investment needs workshop of the Medway Basin on 17 March 2022 (sent as a separate email attachment), and set out below.

It is not clear whether the scale of growth proposed in the Tunbridge Wells Submission Local Plan October 2021 ([https://tunbridgewells.gov.uk/\\_\\_data/assets/pdf\\_file/0009/403587/CD\\_3.128\\_Local-Plan\\_Submission-accessible\\_reduced.pdf](https://tunbridgewells.gov.uk/__data/assets/pdf_file/0009/403587/CD_3.128_Local-Plan_Submission-accessible_reduced.pdf)) (which is currently subject to examination by an independent Inspector) with a plan period of 2020 to 2038 is realised.

There are two proposed strategic site allocations in the Tunbridge Wells Submission Local Plan at Paddock Wood and land at east Capel (proposed strategic site allocation Policy STR/SS1 (see page 138) including 3,490-3,590 houses (3, 590 by 2038)) and the new garden settlement at Tudeley Village (proposed strategic site allocation Policy STR/SS3 (see page 154) including approximately 2,800 dwellings (2,100 by 2038)).

TWBC and Southern Water (Sandra Norval, Future Growth Lead at Southern Water) signed a Statement of Common Ground (SoCG) in October 2021 under the Duty to Cooperate as part of the Local Plan preparation process and committed to working together on the future growth proposed in the Local Plan. Paragraph 4.10 (below) of this SoCG is of particular significance:

“4.10 DWMPs are a long-term planning tool looking forward for a minimum period of 25 years and involve consultation with all the statutory and water related bodies. DWMPs ultimately aim to encompass all drivers and investment, in drainage and wastewater services to manage risks and build resilience and are expected to become statutory plans and updated every 5 years. The outputs from these strategic documents will feed into the Business Plan and internal risk and value process which is designed to enable Southern Water to deliver the most efficient programme at best value to its customers. TWBC is working collaboratively with SW on producing the DWMP for the area, including around Paddock Wood and Capel where significant growth is proposed through Policies STR/SS1, STR/SS2 and STR/SS3...

b) Southern Water has confirmed that projects of a strategic scale that are required to increase the local sewer network and

treatment works capacity, in particular in the Paddock Wood/Capel area, will need to be planned for in its next AMP (AMP 8 - 2025-2030). This will cover the period from 2025-2030 and will be agreed by Ofwat, the Water Services regulation Authority. The delivery of any scheme that is planned for will be provided in line with the occupation of the developments. “

TWBC therefore has concerns that a significant number of the option proposals listed in your investment needs for Paddock Wood, particularly in relation to growth and flooding, have an indicative long term timescale (likely to be delivered 2040 to 2050), which conflicts with the agreement in the SoCG, that the work and investment required in meeting future growth at Paddock Wood will be delivered under the AMP 8 i.e. within the short term (2025 to 2030). We would therefore request that the DWMP re-considers the proposed timescales in relation to these options in order to appropriately respond to the growth proposed for this area of Tunbridge Wells Borough. The Borough Council would be keen to liaise with Southern Water in this regard, in accordance with the agreed commitment in the aforementioned Statement of Common Ground.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(e) I don't know

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

TWBC is pleased to note that on page 38 of the SEA that the need for investment has been identified for surface water separation, to tackle flooding in all priority wastewater systems and at Paddock Wood WTW. As explained in the answer to Q.10b above, it is considered that such investment should be realised in the shorter rather than longer term in line with the growth proposed for Paddock Wood in the Submission Local Plan.

TWBC would request to be consulted upon any proposed construction works (page 39) where:

1. There is potential impact on the visual setting of historic assets during construction, including Registered Parks and Gardens, Calverley Park and Calverley Grounds .
2. Impacts to landscape and visual amenity, particularly any proposals affecting the High Weald AONB
3. Likely temporary impacts during construction on roads and traffic from increased congestion and partial road closures; including the A26 and the A264
4. Potential for impacts to groundwater sources during construction including risk of pollution, including SPZs located at Tunbridge Wells North and Horsmonden

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(1) Strongly agree

**What did you like about our DWMP?**

Good structure and easy to read and follow with good graphics and presentation of key information - in identifying problems and risks, giving examples of solutions and identifying investment needs.

The input from others in developing the DWMP is apparent, but TWBC would request more investment in the Paddock Wood area in the shorter term (rather than the longer term) as outlined in the answer to Q.10b above.

**What do we need to improve in our DWMP?**

Reviewing the longer term investment strategy based on our comments above (and previously) regarding the development growth at Paddock Wood. TWBC and Southern Water have liaised closely in the preparation of the Local Plan ([https://tunbridgewells.gov.uk/\\_\\_data/assets/pdf\\_file/0009/403587/CD\\_3.128\\_Local-Plan\\_Submission-accessible\\_reduced.pdf](https://tunbridgewells.gov.uk/__data/assets/pdf_file/0009/403587/CD_3.128_Local-Plan_Submission-accessible_reduced.pdf)) which sets out the growth prepared in Paddock Wood and at Tudeley , and accordingly, this needs to be planned for in Southern Water's DWMP and forthcoming Business Plan .

ID 4029

**Organisation**

Affinity Water

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Affinity Water are a water supply only company serving customers in parts of Kent for which Southern Water provide wastewater services. As a water supply only company both water resources and water quality are important to us. Protecting groundwater quality is therefore important and we welcome reference in the draft plan of sewer condition in relation to potential groundwater pollution. We would welcome further engagement with Southern Water on investment plans for assets in our groundwater source protection zones in our Southeast supply region. Treated effluent returns from small local works are also often important from a catchment water balance perspective and again we would welcome further engagement on this as you develop the final plan.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

We are supportive of a collaborative holistic water cycle-based approach to the management of our catchments to ensure risks and opportunities are identified and addressed.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

No Response

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

A best value approach is consistent with regulatory expectations and long term strategic planning.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

No Response

**I support the range and type of investment needs identified in the five Investment Plans**

(5) No opinion

**Please explain your answer:**

No Response

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

No Response

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

No Response

**What do we need to improve in our DWMP?**

As a water only supply company operating in your wastewater catchments, we would welcome engagement with Southern Water regarding finalisation of their DWMP.

ID 4030

**Organisation**

Hampshire County Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

The most important future challenge for all authorities within the water management sector is changing mindsets to ensure that water is more widely regarded as a precious resource in its whole lifecycle and not solely as a risk (in the case of flooding) or a right (in the case of drought).

As the effects of Climate Change begin to become more and more apparent across the UK, including drought and surface water flooding, all organisations within the water sector need to work together to ensure that a constant, clean supply of water is not taken for granted, and everyone needs to work to protect it. Often Socio-economic change can be the greatest barrier to projects, even highly technical ones.

Once this challenge has been overcome it will tie together all the individual challenges which the draft DWMP effectively identifies as:

- Climate change.
- Population growth.
- Tightening environmental permits.
- Nutrient enrichment.
- Keeping rivers, lakes, reservoirs and coasts healthy and clean.
- Persistent and biologically active chemicals / pharmaceuticals.
- Public health.
- Plastics and micro-plastics.
- Carbon.
- Ageing assets and infrastructure. Water recycling and repurposing.

- Affordability.

Whilst all of the above challenges are of great importance, the County Council believes that with effective and collaborative strategic thinking and planning, all of these areas can be tackled together. They should not be seen as separate issues with separate solutions, but rather many challenges that can be addressed with a holistic approach. For example, challenging current thinking and designing truly inclusive water management systems which tackle both water quality and quantity.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

As explained in the above answer, collaborative and holistic solutions to the challenges presented is considered to be the most effective long term, strategic way of producing a sustainable water management system for the future which will encompass both water quality and quantity. All organisations with remits in the sector need to be involved and residents and other stakeholders with an interest need to be consulted to ensure all areas of expertise and different areas of priority are considered and taken into account.

However, it is recognised that an appropriate governance structure and a 'champion' needs to be in place to ensure that plans are advocated and taken forward.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(2) Agree

**Catchment wide and nature based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q4. The priorities for future investment - As Lead Local Flood Authority for Hampshire, our responsibility includes reducing the risk of surface water flooding. Any type of flooding is devastating to property owners: it can cause people to have to leave their home; it disrupts lives and businesses; it can cause physical and mental harm; and can cost tens of thousands of pounds and affect insurance premiums. Foul or sewer flooding increases the impact of all of these effects and massively increases the chances of injury or sickness relating to flooding.

Prioritising these issues is a difficult task, as they all significantly affect one another. Groundwater and river pollution, and sewer flooding obviously need to be reduced in order to enhance the environment. None of these are individual priorities. If aging or otherwise failing infrastructure which allows groundwater and surface water into foul systems is addressed, it will naturally address all of these points.

If long ranging, collaborative strategic planning of water management systems is produced, it will continue to reduce all of these risks well into the future.

Effective implementation of nature based solutions will reduce pressure on foul water systems and again address all of the above issues. Significant investment is required in these areas (along with immediate works on failing infrastructure) to ensure these issues do not continue.

Q5. Option Development and Appraisal - The County Council agrees that rainwater absolutely needs to be kept out of foul/combined sewer systems to reduce the risk of flooding and to reduce the amount of expensive, resource/carbon hungry processes for cleaning this water to allow it to return to the water cycle.

However, it is not as simple as saying, run off from roads needs to be reduced. The highway system in the UK conveys significant amounts of water, though this cannot all be viewed as highway runoff. The vast majority of surface run off from the highway does not fall onto roads, but on surrounding land – it finds its way to roads as these tend to be lower lying than surrounding areas, and are often the path of least resistance. Therefore, much more needs to be done to encourage water to re-enter the ground at source to reduce the runoff reaching roads and overwhelming drainage systems. When runoff contains silt etc from surrounding land – this compounds the issue by blocking drains.

The statement - Rainwater Separation. Prioritise the removal of existing surface water connections from the combined sewer network above building additional storage, and achieve year on year reductions in the amount of rainwater that is connected to the combined sewer – needs careful consideration – where will these existing surface water connections then outfall? A coordinated approach with other authorities is needed to ensure that the problem is not merely moved somewhere else.

Again, collaborative work with the LLFA, highways authority, planners, landowners and developers is needed to approach this issue holistically.

Innovative methods of reducing this runoff water need to be considered including green roofs, rain gardens, smart water technology, catchment land management etc.

Q6. Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches - Hampshire County Council believes that the correct approach should be determined on a case by case basis but agrees that nature-based solutions demonstrate significant advantages over traditional engineering techniques in delivering multi-beneficial outcomes and particularly for long range strategic planning of water systems.

However, traditional engineering will remain an appropriate approach to many challenges, in certain shorter time frames and more urgent works where flow control and risk reduction to customers and the environment is needed.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

The County Council strongly believes that significant investment is needed to sustain our water supply, improve our environment and continue to provide our residents with a holistic water management system that reduces the risk of flood and drought as much as possible.

Options that provide multiple benefits including improvements in mental and physical health, reduction of flood risk, improvement in water quality, increase in biodiversity, reduction of water wastage, improvement in customers' knowledge and appreciation of water as a resource, improvement in living conditions etc, should all be prioritised.

The County Council would encourage work to be undertaken into the funding mechanisms for large scale, strategic, catchment-based water management schemes, which would recognise the wide areas of sectors (including businesses) which would benefit from them.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

In principle, the County Council would agree that the risk should be reduced to the lowest band possible. However, this is obviously dependent on the percentage increase in customers' bills and the County Council is mindful of the current significant rise in the cost of living. Clean water, which is necessary for life, has to remain affordable for residents.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

The range of investment seems sensible to the County Council. We would highlight the need for investment in wider strategic plans in partnership with the Environment Agency and LLFA to increase the use of catchment wide solutions, nature-based and headwater attenuation techniques to reduce the peak flows and volumes of water moving throughout the entire water management system, thereby addressing virtually all of the issues highlighted above.

The County Council cannot comment at this stage on whether the scale of investment is sufficient for all potential projects.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

- General comment – the SEA document has no page numbers or paragraph numbers, the links in the contents page don't work so it's quite hard to navigate to specific sections in the report
- Section 3.5 Table 2 – Noise and vibration and traffic and transport effects should also be covered as part of the objectives, or text added to explain if they are covered within other objectives. Noise and vibration and traffic and transport have the potential to impact local residents during construction phases so should be considered.
- Section 3.5 – When construction impacts are not predicted but operational impacts are, it provides an unrealistic view that the works will only have a positive effect. Approximations should be made for construction impacts, including noise, air quality, vehicle numbers etc. as is suggested will be done for operational effects, this will give a more balanced indication of potential impacts of any works.
- 3.6 – Alternatives – the text doesn't discuss any decision making for 'feasible options'. The alternatives section in the SEA should include environmental factors included in decision making and for discounting alternative options.
- 3.7 – disagree with the decision not to review local plans only when a significant effect is identified within the area. This should be extended to any effect, two or more not significant adverse effects from the DWMP and local plans could combine on a single receptor to produce an impact which needs mitigating.
- Table 3 – should include noise Important Areas as SEA considerations.
- Table 4 – where disturbance / disruption to amenity is mentioned this should be more specific as to the types of effect expected, e.g. air quality, dust, noise and vibration, visual impact, traffic etc. to make the reader clear of what is anticipated.
- Table 10 – mitigation should be included for noise and vibration and traffic and transport.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

- Collaborative approach of management of DWMP and future actions
- Recognition of wider catchment issues and the positive impacts these can have on water systems
- Investment in innovative strategic land planning projects including headwater attenuation, NFM techniques, land management, urban SuDS, green roofs etc
- Recognition of the importance of the wider multiple benefits of effective, holistic water management

### **What do we need to improve in our DWMP?**

- Need to recognise that simply disconnecting surface water outfalls from sewers will cause further issues – solutions need to be found before these connections are removed
- ‘Road run off’ needs to be addressed carefully and accept that it is not all from the highway and that the majority comes from surrounding land, including from groundwater sources, and the roads are conduits for water to enter drainage systems.
- There needs to be an emphasis on data sharing (as part of partnership working) which has been an issue in the past, to produce clear plans/maps of systems and interactions of Southern Water assets with wider water systems/cycles.
- Work with other RMAs to create an effective framework to include all organisations within the sector and produce effective strategic long term partnership plans for water stewardship for the future.

ID 4031

Organisation Brighton & Hove City Council

**Are you happy to be contacted about your feedback? Yes**

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

The identified 12 challenges, in combination are all critical to the future resilience of the city's water supply – its quality and quantity and accord with the Greater Brighton Water Plan and the council's 2030 Carbon Neutral Programme. Recognising the effects of climate change are being experienced now is welcome and including as future challenges the need for water recycling and repurposing and the recognition of the carbon footprint of water and wastewater treatment is supported. The identified challenge of the ageing assets and infrastructure is critical, there needs to be a focused investment plan to ensure the network is appropriate, integrated, fit for purpose and resilient. Including in the challenges the public health and affordability issues is welcome. Given Living Coast Biosphere reserve, the Marine Conservation Zone, chalk aquifer and ecological assets the recognition of the need keep rivers, lakes, reservoirs healthy and clean is welcome. However, the council is concerned that Southern Water has not made significant progress on reducing discharges from storm outflows and greater priority needs to be given to this challenge.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Strongly agree that Southern Water should collaborate with relevant organisations. Collaboration is essential to ensure an integrated, resilient water environment. The examples of the Greater Brighton Water Plan, the Living Coast and The Aquifer Partnership all demonstrate the commitment of the council to promote awareness, share knowledge and expertise and ensure investment plans and projects are better aligned.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q.4 Storm overflows, flooding in a 1 in 50 year storm and sewer concerns are identified as the main concerns in the Adur and Ouse Catchment therefore with respect to Q.4 these issues are all considered critical investment priorities given the concerns with wastewater compliance and the impact that has on the environment.

Q.5. Recognise that tackling the risk of storm overflows as close to the source as possible can help to keep rainwater out to enable more wastewater to be kept in the system and to reduced number of storm overflows. However, system optimisation is also important. The government and water companies need to set and comply with more rigorous targets to eliminate ecological and public health harm from storm overflows.

Q.6 – catchment wide and nature-based solutions allow for multiple benefits – protecting/ improving ground water quality, biodiversity enhancements, climate change resilience and adaptation and also allow for less carbon intensive solutions.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

It is noted that as part of the drainage and wastewater management plan, the investment needs for each of the 61 wastewater systems were considered with preferred options identified for managing and reducing the risk in a way that Southern Water considered represented the best value for customers (those that reduce the risks to more than one of the 14 of the DWMP Planning Objectives, provide the best long-term outcomes and provide the best mix of social, economic and environmental benefits).

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

**Please explain your answer:**

Recognise that significant investment will be required to ensure a resilient drainage and wastewater system for the South East over the next 25 years and welcome the longer-term strategic investment plans.

It is noted that Southern Water have provided a calculation to look at the impact of the investment required to reduce risks to reach Band 0 on customer bills ie the investment needed to limit discharges to inland waters to no more than 20 per year, for bathing water to less than 10 per bathing water season and for shellfish waters to less than 10 per annum. That the scale of investment could mean an increase of customer bills in the order of £160 per annum for the next 25 years and a rise to £392 per annum if customers expect no sewer flooding to occur in a 1 in 50 year storm.

Recognise the need for a long-term programme of climate adaptation. The council would encourage Southern Water to ensure that all efforts towards lower cost, lower carbon, more sustainable solutions are prioritised so that bills are kept affordable.

**I support the range and type of investment needs identified in the five Investment Plans**

**Please explain your answer:** Investment Plan for Internal Sewer Flooding - note that within the Prioritised Investment Needs summary table identified for internal flooding you have included as a short term timescale investment the need for enhanced maintenance – customer education and proactive jetting in the Lanes, North Laine and Church Road locations  
Investment Plan for Sewer Condition and Groundwater Pollution – note that within the Prioritised Investment Needs summary table identified for ground water pollution (PO12) you have included as a medium to long timescale investment requirement for Pipe rehabilitation programme: CCTV surveys, sewer integrity checks and re-lining to reduce exfiltration within Special Protection Zones and Ground Nitrate Zones – in the Goldstone, Lewes Road, Patcham, Balsdean and Housedean locations

Investment Plan for Storm Overflows -note that within the Prioritised Investment Needs Summary table for Storm Overflows (PO5) you have included as a short term timescale investment the need to construct storage tank or separate surface water to reduce spill frequency from Marine Drive WPS CSO

Investment Plan for Compliance and Pollution – n/a

Investment Plan for the Environment – note that within the Prioritised Investment Needs Summary table for Bathing Waters (PO13) you have included as a short term timescale investment the need to construct storage tank or separate surface water to reduce spill frequency from Marine Drive WPS CSO.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

First three

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?** Welcome the recognition of the need to develop effective long-term solutions that deliver a natural capital approach, consider carbon reduction and biodiversity net gain, as well as catchment-level and nature-based solutions.

Agree that rainwater separation is the most sustainable long-term option for tackling the issues of storm overflows and flooding. The partnership work of TAP has been important in the city in demonstrating that there are natural ways to keep water out of the sewer system, protect water quality and provide ecological benefits. The council through its City Plan Part 2 (Policy DM43) and Sustainable Urban Drainage SPD and pilot projects (SCAPE) is requiring and demonstrating the benefits of SuDs and would we would like to see from Southern Water is further proactive engagement and investment from on future projects in the city.

Welcome the commitment to actively seek opportunities to work in partnership with others to provide 'green' infrastructure such as trees, hedgerows, parks, fields and forests and 'blue' infrastructure including rivers, canals, ponds, wetlands, reservoirs and floodplains within existing communities

Welcome the recognition of the need to tackling the problems at source – customer education to reduce blockages and reducing rainfall getting into the foul and combined systems.

Welcome commitment to investment and greater use of nature-based solutions and sustainable drainage systems and retrofit SUDs– this alongside water efficiency in new developments will help balance the needs of new developments, the requirements to invest in carbon-intensive infrastructure and ensure more water is left in the environment.

Welcome prioritisation of the removal of existing surface water connections from the combined sewer network and commitment to strengthen their advice to planning authorities to ensure new build properties and developments only connect foul drainage to our sewers.

Southern Water want to work with the highway authorities to tackle road run-off - to support and encourage them to improve surface water management and reduce pollution from the road network

**What do we need to improve in our DWMP?**

Southern Water need to make SuDS the first option not a preferred option (so traditional techniques are ruled out unless there are no other options)

Better information on long terms cost/savings factored in, better internal training so that SuDS is the first option not 'traditional' techniques, but a recognition there are times those are a 'preferred option.

Southern Water should be more proactive and lead projects to improve water quality and reduce flood risk, they are a major partner.

ID 4032

Organisation Fareham Borough Council

**Are you happy to be contacted about your feedback? Yes**

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

The Council considers all of the challenges identified by the DWMP process to be important and the DWMP should be looking to tackle each of them. It is considered that the most notable present challenges are: climate change (leading to increases in storm overflows and flooding), population growth (increased burden on existing infrastructure) and aging assets and infrastructure (given climate change and population growth, existing aging assets and infrastructure are more likely to be overwhelmed). The Council also considers the presence of micro plastics, persistent and biologically active chemicals / pharmaceuticals and nutrient enrichment of receiving waters to be challenges that the DWMP working alongside other organisations and industries should also be attempting to address.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

In order to carry out their legal duties and obligations, Southern Water should be collaborating with other organisations with responsibilities for water and protection of the environment to improve the management of the drainage and wastewater network.

Collaborative working with organisations responsible for water, the protection of the environment, and organisations responsible for planning and development such as Local Planning Authorities will provide opportunities to achieve several positive outcomes and help promote nature-based solutions for the benefit of local communities, nature and the wastewater network.

**The priorities for future investment should be: My number 1 priority is:**

Storm Overflows

**The priorities for future investment should be: My number 2 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 3 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 4 priority is:**

Sewer Flooding

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

(4) The Council considers all five options to be highly important and believes that each need adequate investment. It is considered that they are all interrelated and achieving improvements to all will result in a cleaner and healthier water environment.

The Solent Region is an area that is being impacted by high levels of nutrients. Whilst it is appreciated that there are several sources that contribute to the nutrient issue, the release of untreated/partially treated sewage during storm overflow events, WwTW compliance failures alongside sewer condition and groundwater pollution are contributing factors to the deteriorating marine environment which also poses risks to human health. It is for these reasons that the Council chose those to be the top three in terms of highest priority. Sewer flooding is also important and needs to be addressed whilst enhancing the natural environment is key to promoting more sustainable nature-based solutions which would help improve and alleviate the other identified priorities.

5) The Council supports the idea that rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows. Policy CC2 Managing Flood Risk and Sustainable Drainage Systems in the emerging Fareham Local Plan 2037 seeks to permit development where certain conditions around run-off rates from proposed development and the management of onsite surface water run-off are met. The Policy makes it a requirement of all relevant development to provide Sustainable Drainage Systems (SuDs) in recognition that SuDS are able to reduce the impacts of flooding whilst also removing pollutants and providing recreational, amenity and wildlife benefits. Southern Water have been involved in the creation of this policy having been consulted numerous times throughout the preparation of the Local Plan and as signatories of a Statement of Common Ground with the Council.

6). Whilst the Council agrees that nature-based, catchment wide solutions form an integral part of resolving some of the significant risks identified in the DWMP, providing additional benefits to the environment, there will be instances where hard engineering and physical upgrade works to WwTWs will be necessary. For example, to ensure WwTW compliance with permit limits, tackling key nutrients such as nitrogen and phosphorus, and to reduce instances of storm overflow events, it is likely that physical upgrades to several WwTWs and the wider sewer network will form a key part of the overall solution. From the Council's awareness of how Peel Common WwTW operates, improvements to tackle key nutrients linked to

adverse impacts on designated sites can only be achieved by investing in infrastructure rather than employing nature-based solutions due to the high volume of wastewater this treatment works has to handle.

The Council would highlight a recent Written Ministerial Statement made on 20th July 2022 which states that there will be instances where engineering operations and physical upgrades are going to be required in addition to catchment wide nature-based solutions. Within the Written Ministerial Statement, the Secretary of State for Environment Food and Rural Affairs announced a proposed amendment to the Levelling Up and Regeneration Bill which would place a new statutory duty on water and sewerage companies in England to upgrade wastewater treatment works to the highest technically achievable limits by 2030 in nutrient neutrality areas. The Solent region is an area impacted by high levels of nutrients and it is understood that several WTWs that operate in the region do not have permit limits on key identified nutrients.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(5) No opinion

**Please explain your answer:**

The Council considers it important that Southern Water prioritise any options that reduce the most significant risks identified by the DWMP process across several planning objectives whilst also delivering wider benefits to people and the environment such as the improvements to wastewater treatment works by 2030 as highlighted above. This is to ensure that issues associated with poor water quality are addressed effectively and quickly. Least cost options that do not deliver the best outcome for residents and the environment would not be supported by the Council.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

The Council agrees that the risks identified by the DWMP process should be reduced to band 0 (not significant). However, the impact on customer bills should be fair and proportionate. For example, customers should not be expected to pay additional costs to account for any previous historic failings by the wastewater company, or to pay for measures which should already be required or will be required in future to ensure legal compliance with the relevant water and/or nature legislation.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

The Council is broadly supportive of the Investment Plans for example those covering the Planning Objectives PO3, 5, 6, 12, 13 and 14 and welcomes measures such as increasing WwTW capacity, increasing storage tank volumes, creating new storage tanks, surface water separation etc. to reduce identified significant risks.

However, the Council is concerned that elements of the Investment Plans do not go far enough in terms of actually delivering measures that are capable of successfully reducing some of the identified risks.

It is appreciated that studies and investigations are needed to fully understand the scale of the issue and identify solutions to some of the risks identified by the DWMP process (as set out in the Investment plans covering Planning Objectives PO9 and 11 in particular). However, the Council believes that the identified solutions or investment needs that will arise from those studies and investigations should not be left to subsequent DWMPs but should be included with appropriate (even if approximate) investment allocated within this DWMP in order to effectively demonstrate a reduction in the identified risk. We believe that this is required to meet obligations on public bodies under the Habitats Regulations where there needs to be a degree of certainty that mitigation is in place and will be effective. Prioritised investment need for Nutrient Neutrality (PO11) is one such example where the Council considers a study/investigation does not go far enough to reduce any of the risk associated with this particular planning objective.

For example, the Council notes the timescales for achieving the Planning Objective PO8 for Peel Common WwTW as medium meaning for the period 2030-2040. The Partnership for South Hampshire Integrated Water Management Study (2018) indicated that due to forecasted growth in the catchment served by this WwTW, increased capacity at the treatment works may be needed as early as 2025 (paragraph 3.4.14). Reassurance is sought that the timescales for the investment in capacity at Peel Common WwTW is appropriate.

Southern Water may be aware that the Council has undertaken work to establish the nutrient loading from development contained within its emerging Fareham Local Plan 2037, as have many planning authorities within South Hampshire. The Council would be willing to share this work with Southern Water to help the investigation/study with regards the nutrient neutrality (PO11).

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(e) I don't know

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP? No**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

The Council is grateful for being involved in the DWMP process and being able comment on and provide feedback to Southern Water at each stage. The workshops held by Southern Water were useful in understanding the process and how each of the planning objectives, risks, identified options and investments needs have been derived. The Council considers that DWMP correctly identifies the most important planning objectives and associated risks and welcomes the investment intended for Peel Common WwTW and its catchment which serves households in Fareham, although we have significant reservations about the pace of change as the Solent is experiencing significant issues now which need to be addressed in the short term.

**What do we need to improve in our DWMP?**

The DWMP highlights the use of nature-based solutions, however within the Investment Plans there appears to be minimal options presented that involve such nature-based solutions. The investment plan for the environment in particular would present a good opportunity to include more nature-based solutions to tackle some of the planning objectives particularly those around nutrient neutrality and bathing waters such as by creating habitats and other natural features that will help to improve the water quality of receiving waters whilst delivering other benefits for nature. However, it is also appreciated and recognised that nature-based solutions can only go part of the way to addressing some of the issues at this scale.

In addition, if the proposal is for the Water Industry National Environment Programme (WINEP) to draw upon information in the DWMP then nature-based solutions should form a greater part of this DWMP to help inform the WINEP.

ID 4033

**Organisation** Eastbourne Borough Council and Lewes  
District Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

There are coastal change risks as well as uncertainties around changing climate and long-term funding. In terms of funding, for example, it is often reported that high premiums accorded to shareholders may decrease the level of funding that can be utilised to ensure the maintenance and/or improvement of existing services as well as seeking to adapt to new challenges that arise. Overall, these issues may be assisted by the sector's regulator taking a firmer approach.

The evidence used to assess the impacts of climate change and the increased risk of flood risk is noted. This summer we have experienced long, hot, dry spells. In both the Newhaven East and Eastbourne systems there are stretches of sewers which have limited fall. These stretches are prone to 'drying out' and stagnation, which was experienced in 2003 and again this year. The result of 'drying out', or very low flows, is that sewage can become stagnant and anaerobic. This can create hydrogen sulphide, which is noxious and toxic. This may impact upon the effectiveness of the yeast/ bacterial/ microscopic cultures that operate in wastewater treatment works, resulting in a failure in their ability to treat sewage.

The 'drying out' can produce a crust or cake that can physically block sewers. In addition, the drying and heating of the ground can cause sewers to fail. It is noted that this risk has not been identified in the consultation documents provided. It is also noted that at certain locations in Eastbourne and in Seaford, Southern Water Services (SWS) would appear to be using tankers to remove sewage from the sewerage system. This may indicate that the situation described above has occurred. Repair work should be carried out on sea defences at Portobello Pumping Station in Peacehaven. Long term, 2050 to 2090, the undefended section of the coast between East Saltdean and Portobello may result in the sewage network being at risk of being severed by coastal erosion. Such a situation would place the Brighton Network at risk. The consultation Plan document does not appear to discuss how SWS will need to work with East Sussex County Council Highway Authority, Lewes District Council and the Environment Agency to seek a coordinated approach to coastal erosion risk management along this stretch of coast. Such work would need to be planned into the Asset Management Plan process.

Similarly, the sewerage assets between Seaford and Newhaven, including the Newhaven Works, could be at risk as the coast changes and sea levels rise. This is particularly the case for the Newhaven Works, where the Tidal Mill section of the Shoreline Management Plan identifies this as an area where the policy will seek a managed realignment in the next decades. The Drainage and Wastewater Management Plan should have regard to how SWS will work with the relevant agencies to explore the implications of the Shoreline Management Plan policies, and how the risks posed could be assessed and managed.

Correspondingly, finding a united method of working among stakeholders should be sought, with combined joint goals to assure there are no contradictions. Nature and the environment should be considered as a priority.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The sharing of information, in an open and transparent, positive and timely manner is important. Good communication is key to successfully working towards common goals. This should go beyond sharing information to sharing resources and data.

Given how many relevant issues are interrelated, there is a need for a firm, long-term, top down commitment so that resolutions can be found to the issues we face. Shareholders also need to be committed to this approach. A good example of working together is provided by Brooklyn Road in Seaford. However, lessons can be drawn from local residents regarding their distrust, associated with a loss of confidence, which led to many hours of officers' time. See also the response to Q3a above.

It is of note that there is reference to storm water storage systems, but there does not appear to be discussion of where these exist (should this reference Lewes and Brighton and Hastings?) Information concerning where such storage facilities would be required in future appears to be missing - Eastbourne, Newhaven or Seaford, for example.

In terms of flooding, it is noted that data for only three years is included. The data is provided for number of properties flooded by sewage. Is a longer data set data available? Such data that includes, for example, years 2000/01, 2007, 2012, 2013/14, 2014/15 and 2015/16, when there was extensive flooding or prolonged storm patterns dominating the weather would be useful.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Concerning Question 4, all the options are considered equal and are mutually connected, so including a response in terms of priority would not be appropriate.

Reason for response to Question 6: Nature-based solution should be a priority and should be incorporated wherever appropriate and the opportunity exists. Nature-based solutions offer numerous benefits to people, wildlife and the environment and can be used to benefit/help multiple areas. These include natural flood management, habitat creation, health and wellbeing benefits, education resources, formation of part of nature corridors, carbon storage opportunities, use of traditional methods, improvement of other natural services/natural resilience, cost effectiveness, multiple other land owner benefits, and longevity.

Resolving these issues will require a firm steer from central government. Such issues are strongly influenced by the permissance of development, and will require long term education of developers and tradespeople for example, in terms of new approaches/nature-based solutions, and the education of consumers. Leading by example would be beneficial, with the provision of case studies assisting the process.

To be effective, it will also require a regulator that is appropriately resourced and supported.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

Least cost may mean that wider and real cost and benefits of a waste management systems are not incorporated, and consequently not appropriate and resilient for the future. In effect, the cost may be borne by the environment and future generations.

Therefore, a longer-term view, resulting in multiple benefits (including ecological and environmental benefits) that results in sustainable and environmentally conscious results would be beneficial.

The Investment Strategy (Figure 16, page 65) should not be to 'maintain'. The years of deferred maintenance challenge resiliency of the entire network, not only the areas which are assessed with high potential risk. The overall Investment Strategy should be to 'sustain' the network.

When a Sustainable Investment Strategy is applied, there will be many more 'best value' options, because the threshold for intervention (investment) will be changed.

Delivering wider multiple benefits over the longer term should be the focus, concentrating on sustainable approaches and longevity.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

There may be a justification for considering the economic model of wastewater providers including who may bear the cost. The foregoing years of South East Water management have caused much deferred maintenance; reparation should not be financed by current and future customers.

Similarly, there have been issues at Brooklyn Road, Seaford, albeit improved, and repeated sewage discharge in Martello Fields, Seaford, although again improved. It is noted there was sewage discharged from a manhole in Vale Road, Seaford, during the storm of the 17 August 2022. In Lewes there have been issues with sewage discharging in the vicinity of Victoria Hospital, again recently improved.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:** There appears to be limited exploration of how and what the changing coast will impact upon, in terms of wastewater treatment facilities and long outfalls, and how these issues would be accommodated within the investment programme. The way investment is planned appears logical. However, it seems this is based on incomplete data (of numbers of properties at risk, for example). Is there any control of the register for this data? Over which timespan are wastewater issues registered? - This should be for longer than the previous two years.

Why, for instance, is the water treatment works in Ringmer (Lewes District Council) not mentioned while its capacity is at the limit and problems exist with internal flooding?

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(5) No opinion

**What did you like about our DWMP?**

**What do we need to improve in our DWMP?**

In further response to Question 11, it is not thought that the options are mutually exclusive. However, there is a need to ensure that homes, communities and business are not flooded with sewage with resulting cost and public health impacts. Given the nature of the Adur and Ouse catchment, there are a number of rural sewage works. Consideration could be given to opportunities for the DWMP to seek an additional level of treatment before final discharge to rivers and other water courses.

The additional treatment would preferably be nature-based, using lagoons and reed beds. This would improve treatment before entering the water courses, removing nutrients responsible for eutrophication of Sussex rivers and the near shore coastal waters. Reducing algae blooms and increasing biodiversity at the water column would be clearer. In addition, such lagoons would provide additional capacity during storm events, and so reduce the volume of untreated sewage entering a water course. Such lagoons would enable some treatment prior to entering watercourses.

Finally, it is difficult to verify your data on (population) growth combined with capacity of water treatment works. Which plant covers which area? What is the capacity of the plant? What is the condition of the plant? Are there results of the assessment for each plant and network? What is the resiliency of each plant/network? It is therefore not possible to comment on this aspect of the investment plans as fully as we would have wished to.

ID 4034

Organisation CCW – Consumer Council for Water

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

The company has identified the major challenges its DWMP must address now and in the future. Climate change and its impact on weather patterns – particularly more extreme rainfall patterns – is likely to exacerbate many of the other factors that the company's Plan will need to take into account both in managing wastewater and minimising its impact on the wider environment. The company will also need to deal effectively with customers' expectations and consumers' growing concern about safeguarding of the environment.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The company holds a vital place within the community in effectively providing both water and wastewater services. It must work in collaboration with other organisations and stakeholders to ensure that it can benefit from advice and guidance from relevant experts and regulators as well as working with consumers and local communities to understand their priorities and to gain and maintain the trust of the people they serve. While the company operates in a discrete area, it does not work in isolation and so must collaborate with others to ensure any national wastewater strategies are reflected in its plans. We are pleased to note that the company has engaged widely in the development of its Plan.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q4. It is difficult to prioritise the options as this seems to indicate some can be of less priority when in reality all are important. They are also inter-linked and an improvement in any of the first four may also enhance the environment. Storm Overflows and sewer flooding are the most visible to some customers and are seen as priorities by them. But the company needs to draw on the findings of customer research to establish what are priorities for the wider customer base. Internal sewer flooding is unacceptable in any circumstances because of its impact on the individuals and families who suffer. Minimising storm overflow discharges and wider sewer flooding can be seen as directly affecting the level of trust consumers have in the company. This will directly impact the level of their satisfaction with the company, the services they receive and the prices they pay

Q5. Agree in principle subject to costs being reasonable and supported by customers. Separation of rainwater and foul sewage can have a major impact in reducing storm overflow discharge and sewer flooding. With more frequent severe rainfall events becoming more likely with Climate Change, separation of these systems is increasingly more important in mitigating against pollution incidents occurring. It will also allow the company to treat foul sewage more efficiently without the variable dilution and volumes caused by rainwater. We would expect the company to work with developers to ensure separation in all new developments. Other separation schemes need to consider areas at high risk of sewer flooding opportunities for collaboration and should be paced to spread the cost.

Q6. In general, 'best value' solutions should be sought given the impact of any works on customers' bills. Nature based and catchment wide solutions can represent the best value long term solutions, and we would encourage the company to look to the long-term outcomes that can be achieved rather than adopting traditional engineering solutions that might offer an earlier output but come at a cost to the environment.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

We would encourage companies to look at long term 'best value' solutions that provide lasting and wider ranging beneficial outcomes. While there is an attraction to 'least cost' options, these can result in shorter term solutions that need to be revisited to provide longer term resilience, ultimately at potentially higher cost to customers and the environment.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(1) Strongly agree

**Please explain your answer:**

Ultimately, there has to be a compromise between the company's ambition and the impact of investment costs on customers' bills. This should be informed by engagement with customers to establish their priorities and their willingness to pay – on bills – the costs of proposed work, and the pace with which they want to see improvement. It must also run in tandem with measures to protect financially vulnerable customers who may face affordability issues with increasing bills. The single water affordability scheme, which Defra is considering, is key to unlocking investment by protecting those least able to pay.

**I support the range and type of investment needs identified in the five Investment Plans**

(1) Strongly agree

**Please explain your answer:**

The investment plans reflect the holistic approach necessary for the company to deliver an effective DWMP and strategy that will protect and enhance the environment and deliver the services and priorities that customers increasingly expect wastewater companies to provide.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

CCW is not an Environmental regulator.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It is comprehensive and addresses the need for a holistic approach to improving drainage and wastewater management in the region and in working collaboratively to achieve this. It is logically set out and supported by appropriate appendices. The company has clearly given much consideration in the development of its plan and carried out extensive engagement with stakeholders and other groups including customers. It is also clear how these groups have influenced the plan and importantly how the company has responded to the comments made. The issues the company and its region faces are clearly set out along with the actions the company proposes to address them.

**What do we need to improve in our DWMP?**

The draft DWMP is, by its nature, a technical and complex document that is not very accessible to a wider audience. It is important that customers and non-technical stakeholders can understand and contribute to the company's plans. We are therefore encouraged that the company provided an easy to understand summary of the draft plan and of the priority areas for this wider audience. The company has a comprehensive suite of webpages about the DWMP. This sets out what a DWMP is and the process of its development. The site is broken down into its 11 river catchment areas catchments, which will help focus attention of local interest groups.

We would like to see the company develop these further in the final plan to include likely bill impacts and the use of videos and clips to make them easy to access and understand.

ID 4035

Organisation Environment Agency

**Are you happy to be contacted about your feedback? Yes**

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Addressing the lack of investment in the drainage and wastewater network over the last 20-30 years. The current poor state of the infrastructure is largely responsible for non-compliance with discharge permits, pollution incidents, far too frequently spilling overflows and sewer and surface water flooding. Climate change and growth present significant future challenges as both will place significant additional pressures on what is currently an inadequate drainage and wastewater network, in terms of capacity and the state of the infrastructure. The DWMP, looking 25 years ahead facilitates the planning to manage and mitigate the risks that have been identified. You have correctly identified that future solutions need to focus on removing stormwater from combined systems, rather than constructing ever bigger STWs and storm tanks to handle greater flows. Such future challenges need to be met by technological advances in surface water separation techniques.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

We strongly agree with the principle. A co-created plan with co-created solutions will more easily gain stakeholder and community acceptance. Also Southern Water does not have all the answers and will benefit from the knowledge of others, also enabling integrated solutions to drainage and wastewater problems which are likely to be better economically and environmentally. We recognise that Southern Water's approach to stakeholder engagement was very good for this first DWMP and we are aware that Southern Water has made changes to its plan following stakeholder comments in several areas, but some of our operational staff were left disappointed because some of their suggestions, and those of other stakeholders hadn't been taken up, particularly co-funded solutions. Future collaboration is essential and will only work if stakeholders feel some sense of ownership.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q4. All these priorities are important, but legal compliance must take precedence. Legal compliance needs to be covered in the DWMP but should also be taken as read, with the DWMP further focusing on going beyond legal compliance for the benefit of people and the environment. The focus needs to be on managing/mitigating the risks in priority order which will most likely require a mix of the investment plans with the development of options addressing the risks and providing social and environmental benefits across the range of priorities. The challenge for all water companies is to plan to address the infrastructure underinvestment of the past, whilst at the same time account for future impacts arising from growth and the impacts of climate change. To do so will require the optimum combination of the five investment plans.

Q5. In a water stressed part of the country consideration needs to be given to harnessing the rainwater from roads, roofs and other areas for non-potable uses. Any Water Resources benefits would need to be included in best value assessments. Catchment wide and nature based should be prioritised over traditional engineering approaches, but we recognise that in some cases, traditional engineering approaches will be the most appropriate solution. Catchment wide and nature-based solutions should be the first choice solutions (in accordance with your solutions hierarchy) and only rejected if infeasible or prohibitively expensive (after the social and environmental benefits have been taken into account). Separation of surface water and catchment wide solutions will most likely be better economically and environmentally, although we recognise there could also be less certainty of outcome. We understand that the Plan is open to nature-based/surface water separation solutions depending on the results from the five trial areas. We suggest that if interim results are positive Southern Water needs to put more emphasis on Nature Based solutions than is currently in the Plan. Southern Water needs to lead and be bold

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Social and environmental costs and benefits need to be included in the assessment of schemes to manage the risks, using either the Green Book approach and/or some form of multi criteria analysis as you have done in this iteration of the plan. The options hierarchy (Source-Pathway-Receptor model) is also prioritising best value solutions. A least cost (to the water company) approach is unlikely to derive the best plan for people and the environment.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

The plan does need to address the risks with the goal of reducing the risks to Band 0, but the question is too simplistic. The objective of this DWMP and future DWMPs should be reduce all the risks to Band 0. However, the timescale for achieving that must be balanced against bill impacts and how important these issues are to customers, linked to their willingness to pay. We expect Southern Water to explore these issues with customers in the development of its Business Plan, where drainage and wastewater objectives need to be considered alongside other areas of water company expenditure.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

We like the approach enshrined in the source-receptor- pathway model. A hierarchy of solutions that places source options first: that must be the way forward. But while the company is open to nature-based solutions/surface water separation it appears that in much of the plan 'grey' solutions have been selected. Also we were left feeling the Level 2 and Level 3 plans were still fairly strategic which didn't allow us to see what solutions were being proposed in specific locations. How does the Plan get properly costed with elements progressing to the company's Business Plan without this step?

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

First three.

The Environment Agency supports all three scenarios. They are not independent of each other. For example, ensuring storm overflows operate only in unusually heavy rainfall events will also protect the environment and public health in designated bathing waters.

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

The WINEP needs to be strongly linked to the DWMP and WRMP with information flows in both directions. Existing WINEP schemes need to be reflected in the DWMP as part of the evidence base, but we would also expect the DWMP evidence base to identify solutions that would be appropriately funded through the WINEP. The DWMP has confirmed the poor state of much of the sewerage infrastructure. However, the WINEP is not the vehicle to address these problems, as its focus is the meeting of new obligations.

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP? Yes**

**Please explain your answer:**

Please see Annex 1 of our consultation response

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

Please refer to our Executive Summary

**What do we need to improve in our DWMP?**

Please refer to our Executive Summary

ID 4036

Organisation RSPB

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

All challenges raised within the Draft DWMP have implications for the environment and must be addressed to ensure the damaging impacts on the environment from Southern Water's operations cease. In addition to putting in place measures to restore habitats impacted by past activities and creating opportunities for environmental enhancement, particularly increasing resilience to climate change.

It is inappropriate for the challenges identified to be considered as future issues, these are existing challenges that require urgent action.

We consider that climate change (1) is the most concerning issue, with nutrient enrichment (4), keeping rivers, lakes, reservoirs and coasts healthy and clean (5), plastics and micro plastics (8), carbon (9) and aging assets and infrastructure (10) also of significant concern for wildlife and the wider environment. Several of these issues act synergistically e.g. climate change, nutrients, pollution (aging assets) on the environment, together with changes in water availability as a result of abstraction, and therefore it is essential that a holistic approach is taken to tackling these challenges.

The focus should also extend to reversing the damage caused by legacy issues and ensuring that designated sites that have, and continue to be impacted by Southern Water's activities, are functioning for their designated purpose and are in favourable condition.

The damage caused has been significant and it is vital that Southern Water work with stakeholders to address impacts to the environment.

The RSPB would strongly encourage Southern Water to focus on solutions to these challenges that have multiple benefits. Utilising catchment-based partnerships and nature based solutions, particularly those that build resilience and address the future needs of our changing climate.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

The RSPB believe it is vital for Southern Water to collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater, as well as other areas of their business. Collaboration should also not be limited to those with responsibilities for water and water protection. To provide sustainable solutions for drainage and wastewater management, that effectively protects the environment and provides best value for customers a diverse range of stakeholders should be engaged with, particularly farmers, large landowners, developers, house builders, industry and local planning authorities.

Southern Water should ensure that any collaboration is effective and delivering for the environment. For example, there are many different advisory bodies / organisations, Southern Water must ensure a joined-up approach that delivers real tangible outcomes.

The current Draft DWMP lacks ambition in terms of the use of catchment-based partnerships and nature-based solutions. Southern Water could look to collaborate outside of their geographic area to strengthen the research into nature-based solutions and implement this within their operational area.

Southern Water should ensure transparency in terms of impacts to the environment and make it clear what these are, and what is being done to address these issues, to build trust and support collaboration.

It is also important that Southern Water does not rely on other partners and collaborators to deliver for them but understands the value in working together to achieve greater and wider outcomes.

Some points below highlight the importance of collaboration and some areas of focus:

- It is apparent that lack of communication between water companies and local authorities causes issues relating to sewer capacity, that can result in flooding events and the use of storm overflows, that allow sewage to impact the environment. Southern Water should work closely with Local Planning Authorities to ensure new developments have effective drainage and wastewater provisions and target SUDS and other innovative mechanisms for existing developments to divert rainwater out of the sewer systems.
- Close collaboration with eNGOs to ensure the environment is prioritised within future plans and to identify opportunities to restore habitats damaged by previous operations, achieve multiple benefits from infrastructure projects and build environmental resilience for the future.
- Working with statutory bodies to ensure that the correct course of action is taken, particularly in the case of SSSI's
- Widely consulting and working with landowners to promote more proven nature friendly and catchment-based approaches to land management, that also benefit the management of water and water bodies.
- Working with other water companies to develop an evidence base for nature-based solutions. Utilising approaches and successes outside of Southern Water's area.

Finally, it is apparent that collaboration must include Southern Waters customers, particularly as many of the issues relating to wastewater management stem from existing developments and run off as Southern Water suggests within its consultation. Therefore, there should be enhanced effort to bring customers on a journey to protect the environment, through their attitude and behaviour towards water. Working at a local level with communities is clearly an important aspect of this.

**The priorities for future investment should be: My number 1 priority is:**

Enhancing the Environment

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

The RSPB would like to highlight that all of the priorities are important, and some are a legal requirement, therefore prioritisation is not considered appropriate, and we stress concern at this approach. Instead, all the issues highlighted by the future investment should be addressed in tandem, with a focus on the impacts to and restoration of designated sites. The outcome that needs to be achieved should be prioritised rather than individual interventions. By adopting a holistic approach to issues, ensuring legal compliance is a minimum in terms of wastewater and pollution, environmental impacts should be limited.

A further point to address, Southern Water uses the term 'Enhancing the Environment', however it equally needs to focus on protecting and restoring the environment, where damage has occurred. For example, in the Eastern Solent and Arun Valley where there are extensive issues relating to water quality and quantity.

Southern Water emphasises that 80% of the water in sewers is from rainwater, therefore it makes sense to divert this resource. Southern Water should work with stakeholders, landowners, and Local Authorities to address this issue on existing developments, installing SUDs particularly in vulnerable locations in proximity of designated sites. Pilots or path finder's have been implemented; however, the prioritisation of designated sites has not been included within these working areas. It is advisable that for effective SUDs management and its wider application Southern Water must work with the industry to lobby the use of SUDs within building, development and planning.

Southern Water should be ambitious when considering catchment and nature-based solutions, harnessing nature to improve water quality. Particularly working with the agricultural industry and prioritising protection and restoration of designated sites.

The RSPB is surprised and disappointed that the Draft DWMP investment plans have failed to incentivise and identify nature-based solutions and instead focus on traditional methods and hard engineering.

If this approach is due to the lack of evidence, Southern Water should look to support the evidence gathering from other catchment and nature-based projects outside of Southern Waters geographical operation. It is essential that outcomes generate a sustainable approach which is often not the case with hard engineering. It is important that a comprehensive evaluation of the cost and benefits of different solutions is considered that places appropriate weight on environmental

values, for example, the carbon footprint of both construction and operation, additional benefits that can be delivered through alternative solutions including community benefits.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(2) Agree

**Please explain your answer:**

The RSPB agrees that delivering multiple benefits is positive, rather than assessing options purely on financial cost. However, we would like to see the prioritisation of options that restore the environment and achieve good ecological status. We welcome the inclusion of good ecological status as a planning objective as part of the consultation, but do not consider that it has been given sufficient weight.

It is important that there is transparency on how options are assessed against the planning objectives, especially those that deliver multiple benefits, and how this will be monitored.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

The RSPB do not consider it is our place to comment on customer bills, however Southern water have an obligation to be legally compliant as a minimum. We would like to see no impacts to the environment and risks should be reduced to Band 0 as a minimum.

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

The interventions focus on hard engineering and not on catchment and nature-based solutions, that have been suggested within the consultation presentations. There seems to be a mismatch between what has been promoted through the consultation process, and what has been identified within the draft DWMP for investment.

We do not consider that investment has been prioritised enough towards interventions to protect, restore and enhance designated sites.

The RSPB are concerned in terms of the geographic spread of interventions, and the lack of prioritisation of designated sites. We also consider that by adopting a catchment-based approach other interventions may be prioritised such as those upstream in catchments. However, we would raise the lack of clarity within the information and a future request for an interactive map, to create a visual representation of project and place. This would have made it more user friendly and easier to get a clear understand of where interventions are planned and how they relate to each other

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Yes

**Please explain your answer:**

There is insufficient information within the SEA on the current context of the water environment that the DWMP will impact (either positively or negatively). For example, the current condition of the designated sites is not detailed, which is very relevant given that many sites are in unfavourable condition, and for some this is as a result of poor water quality / high nutrient levels partly resulting from Southern Waters operations e.g. Arun Valley SPA, Chichester and Langstone Harbours SPA.

The indicative HRA (Appendix F) is limited in its ability to assess the impacts of the DWMP on protected habitats as the detail of the projects that will come from the DWMP is not currently available. However, it is clear that there is considerable potential for the DWMP to impact protected habitats given that for half of the investment needs the construction activities have been assessed as having the potential to result in temporary or permanent changes. We strongly urge, that consistent with the requirements of the Habitats Regulations, that consideration of how projects can be delivered and adapted to minimise or remove any impact to these habitats must be a priority.

Given the large number of investment needs which have a potential to impact protected habitats there clearly is

opportunity to benefit protected habitats and we would urge that Southern Water prioritises (i) reducing / removing impacts from their operations on these designated sites (ii) restoring damage caused by past/ current impacts (iii) opportunities to enhance and build resilience for these protected habitats.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(3) Disagree

**What did you like about our DWMP?**

The RSPB is very supportive of the creation of DWMPs and understand that there is a need for investment in the drainage and wastewater system to make it suitable for the future (and now), particularly regarding climate change. We welcome Southern Water's consultative approach and the attempts that have been made to engage around the DWMP. It has been helpful to have a range of information presented including presentations and more concise documents.

**What do we need to improve in our DWMP?**

Although the accessibility has been improved since the last consultation, it would be great to break this detail down even further. For example, having separate consultations for eNGOs and customers, and setting out time for the issues relevant to separate stakeholders. Again, there is a great deal of reading which is time consuming, and this is often at a high level and not necessarily all relevant.

We found the categorisation of sewerage catchments hard to navigate and do not necessarily consider that the most important sewer catchments have been prioritised for urgent action.

The consultation presentations contrast with the proposals within the Draft DWMP. Greening was a key feature of the presentations; however, this is lacking in the draft DWMP, which is very disappointing, the resulting risk is that proposals and actions are not aligned.

A major concern is the lack of catchment and nature-based solutions within the plan and an emphasis on hard engineering options, which have a history of impacting the environment, particularly when infrastructure becomes dated and fails and has a significant carbon footprint. Nature-based solutions should be a standard approach e.g. SuDS and treatment wetlands to reduce surface water inputs into the sewage systems, whilst improving the quality of surface water.

It is important that the wider benefits of shifting to more nature-based solutions are captured in decision making. The creation of more sustainable drainage solutions would not only have environmental benefits but also has the potential to benefit the community by providing resources that can enrich their local area and enhance health and wellbeing. This has the potential to facilitate engagement with customers and communities around the water environment.

There is not a clear roadmap for the future interventions, and we would strongly urge that there is plan for future investments into catchment and nature-based solutions. Land will need to be identified and available for these types of measures, and therefore the lead in time for this type of project may be longer than more traditional hard engineering projects. It is essential that a timeline for nature-based solutions is established to ensure there is a timely delivery. We would like to see future planning and investments in nature-based solutions to avoid hard engineering.

It is important that a holistic approach is taken to wastewater management which covers CSOs, wastewater treatment

works and septic tanks. We welcome the positive ambition to prevent damage from storm overflows, but it is essential that measures are implemented to achieve this with urgency.

Critically we would like to see Southern Water prioritising the natural environment within its work, particularly designated sites and sensitive catchment areas

ID 4037

Organisation Basingstoke and Deane Borough Council

**Are you happy to be contacted about your feedback? Yes**

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

It is difficult to prioritise (and this might vary with location) and many of the challenges are interrelated.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Important for Southern Water to collaborate with the Environment Agency, Natural England, Lead Local Flood Authorities, as well as local authorities, Partnership for South Hampshire, local catchment partnerships to address issues such as flooding, nutrient neutrality, projected growth and wider environmental objectives that could be achieved through nature-based solutions.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

With regards to Q.6, more information would be needed on the particular benefits/disbenefits of each approach in terms of costs, environmental impacts and wider environmental objectives, timescales for implementation, effectiveness etc. This may vary for individual WTWs.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

**Please explain your answer:**

Priorities will need to take into account other matters than just costs. Whilst best value options may offer wider benefits, sometimes more expensive options that only meet one objective may be necessary if that is an overriding priority.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

**Please explain your answer:**

Whilst measures to reduce drainage and wastewater risks are supported, funding mechanisms/impact on customers' bills and the acceptability of this will need to be considered further.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

The growth projections for WTWs in Basingstoke and Deane Borough are likely to be below that expected for the period up until 2050. It would appear that this is based on Experian population forecasts supported by local Plan allocations and planning permissions. Given that BDBC's adopted plan goes up to 2029 and planning consents will have expired by then, the projected growth beyond 2029 is presumably just based on population projections. The Water Cycle Study for the period up to 2039 indicate that there may need to be permit reviews/infrastructure upgrades for all relevant WTWs – Barton Stacey, Oakley, Overton, North Waltham and Whitchurch with growth expected to be above that projected in the DWMP for the whole period.

The Investment Needs priority in respect of nutrient neutrality (PO11) refers to study/investigation and only includes Whitchurch WTWs in the borough. In light of the recent Ministerial announcement, it is presumed that the DWMP will need to be updated to take into account enhanced treatment for nutrient at all affected WTWs – so Oakley, Overton and North Waltham should also be included – and this should be for more than just study/investigation work.

Whilst it is recognised that investment needs to be prioritised, and there is a lot of investment/infrastructure required, the DWMP doesn't seem to go beyond to improve water quality.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

All are important

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(1) Strongly agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

**What did you like about our DWMP?**

Whilst the DWMP provides a lot of info on the methodology and prioritisation process, it is clear that ultimately there is a need for a lot of infrastructure improvements/investment to meet the minimum requirement without even seeking to achieve improved water quality.

**What do we need to improve in our DWMP?**

Consider potentially higher growth projections and implications for wastewater treatment and environmental objectives, as well as revisiting nutrient neutrality objectives and investment requirements. Basingstoke and Deane's Water Cycle Study identified a need for permit revisions/potential infrastructure upgrades to many WTW, as well as further work on the impact of WTW discharges to groundwater and nearby protected sites (such as the River Test SSSI).

ID 4038

**Organisation**

Horsham District Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Horsham District Council are of the view that the document correctly identifies the key issues for the future in overall terms. However it is noted that some of the challenges will be addressed in other documents – it will therefore be necessary to ensure that the documents and strategies are fully aligned to operate effectively.

From Horsham District Council's perspective, the two most important challenges are considered to be:

- Aging assets and infrastructure. This is a particular issue for Horsham District Council, and we are aware that this is causing issues in our area – future investment is therefore vital. We therefore welcome the investment strategy to improve the wastewater systems in the District (Horsham, Billingshurst, Faygate, Mannings Heath, Pulborough, Slinfold, Storrington, Colgate, Warnham) to ensure they are fit for purpose both now and in the future.
- Water recycling and re-purposing. We understand that this will be addressed in a separate document (the Water Resources Management Plan). As Southern Water will be aware, the issue of water neutrality is currently inhibiting development in the District which is having significant economic and social impacts in the area. We welcome the proposal to recycle treated water so it may be abstracted again as this would contribute to the solution of this issue. It is vital that such schemes are progressed as quickly as possible.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

Horsham District Council has welcomed the opportunity of ongoing collaboration during the preparation of this strategy and considers that this has been critical in establishing the key issues, priorities and next steps in terms of implementing any strategy. We recognise that much of the work undertaken to date is technical in nature but consider that going forward to potential for a range of organisations have in helping to deliver the solutions going forward should not be underestimated. The environment is important to all our residents, and it will be important to ensure that going forward the strategy works with our communities who often understand the local complexities with drainage and have a role to play in both potentially informing and delivering the wider solutions.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(5) No opinion

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q4: Horsham District Council does not agree that these priorities for investment should be ranked as all are of critical importance to ensuring that the environment is protected and enhanced. The matters identified above are interlinked and the infrastructure that is needed to remove and treat wastewater in normal and flood conditions are all critical, and in doing so will help protect and enhance the environment. This is particularly important when factoring the impact of climate change and severe weather events – both drought and flooding events can equally impact wastewater quality and has potential to cause adverse environmental impacts. Any solutions must therefore be considered holistically.

Q5: It is agreed that this is a sensible proposal. Horsham District Council have included in their emerging Local Plan a policy to ensure new developments make appropriate provision for surface water drainage to ground, water courses or surface water sewer in this respect. New development will not be allowed to drain to the foul sewer.

Q6: We support the consideration of nature-based solutions. However, the effectiveness of NBS and the wider impacts are not necessarily fully known. There is therefore some uncertainty that whilst these schemes deliver clear environmental benefits they may not deliver the required level of water management alone. Furthermore, land in the South East is at a premium, and it is unclear whether the amount of land required for NBS is available, although it is recognised that many landowners do see the benefit in participating in such schemes. Therefore, at this stage, it is considered that there is likely to remain a need for a mix of nature based and traditional engineering solutions for the foreseeable future, and therefore both types of solution will need to be considered.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Horsham District Council agree that short term financial considerations should not be the driving factor in any prioritisation. Consideration of a wide range of benefits the environment considered in a strategic and long-term manner, is considered to be a more holistic and sustainable approach to risk reduction is the best way to ensure the environment is protected.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(2) Agree

**Please explain your answer:**

Horsham District Council agree that drainage and wastewater risks should be reduced as low as reasonably practicable. However, Southern Water is a private company operating for profit and is an effective monopoly in the areas that they serve. Therefore, the cost of delivering infrastructure and environmental enhancements should come prior to delivery of financial dividends to shareholders, and not simply passed on to the consumer to pay for.

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

Horsham District Council does not have the in-house hydrological, engineering or ecological expertise to comment on each of the detailed schemes set out in the investment plans and whether they go far enough or are sufficiently timely to deliver the necessary solutions. Nevertheless in general terms we would question whether some of the objectives and targets are sufficiently challenging and whether they go far enough and quickly enough. Eg Every effort should be made to reduce pollution incidents to zero considerably sooner than 2040, which is 18 years away. Furthermore, the consultation makes reference to environmental enhancements, but generally then focuses on retaining the status quo (eg ensuring nutrient levels do not further deteriorate, rather than delivering enhancements). Greater consideration should be made to delivering more ambitious targets and more quickly.

Nevertheless, we welcome the indicative proposals to invest in model improvements, attenuation of excess flows, increased capacity and improved resilience of wastewater pumping stations for the “Horsham New” catchment (P02, P05, P06, P07, P10). We also particularly welcome the inclusion of a study on the sources of risks to good ecological status in the source of the River Arun near Horsham Town. (P09)

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(a) Protecting the environment

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

It is encouraging to note that the proposed measures in the DWMP will have an overall net positive effect on the SEA topics

Q11: As identified in question four, environmental matters are closely interlinked. Given the overarching nature that protecting the environment will bring, it is considered this would as a matter of course also deliver the vital protections to public health and limit storm overflows. It should be noted that within Horsham District we have relatively few bathing waters (as these are primarily, albeit not exclusively, coastal); however, protecting and enhancing inland waters will ultimately ensure that bathing waters in coastal areas remain high quality.

Q12: Horsham District Council agree that as much information as possible should be gathered and assessed holistically by qualified experts. Their recommendations should then be acted upon to ensure the environmental quality of all water sources is sustainably protected and enhanced for future generations. However, this should not prevent any national scheme also utilising other key sources of evidence or strategies from beyond water companies, nor be used as a reason to slow or 'frustrate' processes.

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(1) Strongly agree

**What did you like about our DWMP?**

Horsham District Council would like to thank Southern Water Services in inviting us to participate over the past 2 years with yourselves and other partner organisations in helping develop the draft regional Drainage and Wastewater Management Plan

The council considers that the strategic context, planning objectives and baseline risk and vulnerability assessments that form the plans for each of the River Basin Catchment areas within District's boundary (Adur & Ouse River Basin and Arun & Western Streams River Basin Catchments) fully reflect and provide an overview of the drainage and wastewater systems in the areas and summarises the current performance of the sewerage systems.

In conclusion the Council supports Southern Water's actions and approaches to tackling the challenges of drainage, flooding and protection of the environment within the Drainage and Wastewater Management Plans for the River Basin Catchment areas that fall within Horsham District Council area.

The evidence base is comprehensive and the process by which the draft plan has been arrived at is clear. Although the plan is by definition a highly complex document the language used is as clear as can be reasonably expected.

**What do we need to improve in our DWMP?** The addition of a non-technical executive summary in each of the five Investment plans would be helpful for the general public.

ID 4039

**Organisation** Kent County Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(2) Agree

**What do you consider to be the most important future challenges?**

Many of the challenges cover a similar field, challenges 3, 4, 5, 6, 7 and 8 all relate to the quality and impact of wastewater discharges on the environment. This section might have more impact if these were consolidated into one challenge. It is not clear how these challenges translate into the rest of the DWMP or how the DWMP helps to address them. The DWMP frequently references the impact of surface water on the performance of your sewers, however surface water and surface water removal do not feature as a challenge. Managing surface water effectively and sustainably appears to be a significant challenge.

One of the challenges is water recycling and repurposing, however this appears to be a water resource challenge, and whilst we understand that it needs to be incorporated into the management of wastewater, it doesn't appear to be a specific challenge in this field and there is very little reference to it in the rest of the DWMP, in respect of the recycling of water at WTW.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

We strongly agree that collaboration is important in the development and delivery of DWMPs. However, the involvement of other parties in the development of the DWMP has been in the form of consultation and the input they have had to the development of the DWMP and its objectives have been similar to that of any other plan you would develop, such as your business plan, whereas the DWMP states that it has been developed collaboratively. Whilst the consultation on the various stages of the DWMP development have been good, we do not consider it appropriate to say that the inclusion of wider socio-economic and environmental outcomes is a result of collaboration, this has come from consultation. Collaboration would be indicated by the identification of measures that other parties would lead or participate in and are happy to have these included at this stage having been involved in their identification and prioritisation. Whilst joint delivery is identified in the DWMP for the delivery of some measures, we understand that none of these has been agreed yet and there is much

further work to be done to agree any collaborative measures. We hope that future rounds of DWMPs can be undertaken in a genuinely collaborative way and lead to a plan that includes specific commitments from partners.

**The priorities for future investment should be: My number 1 priority is:**

**The priorities for future investment should be: My number 2 priority is:**

**The priorities for future investment should be: My number 3 priority is:**

**The priorities for future investment should be: My number 4 priority is:**

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(2) Agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

KCC cannot decide on the relative priorities of these very important aspects of wastewater management, we consider them to be of equal importance and many of them are related.

The separation of surface water from foul and combined sewers appears to offer a number of significant benefits to Southern Water across many of the challenges it faces. We regard this as very important.

We support the use of nature-based-solutions, investment decisions should be made on the basis of the most cost-effective option available across the whole-life of the scheme. There are many multiple benefits to NBS and we hope that these are properly accounted for in the whole-life benefit-cost assessment.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

KCC strongly agrees that best value options should take priority. Best value should be considered over the whole lifetime of the investment, not just the capital investment or the costs over the AMP it is delivered in. It is also important that Southern Water fully accounts for the wider benefits to the environment, communities and the economy as a whole in the whole life value assessment.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

It is difficult to answer this question, as it is not clear what each band means, and presumably these differ for each planning objective. As a consequence, we cannot be certain that a “not significant” impact is sufficiently insignificant to be an objective that we can support. Similarly, what may be assessed as not significant may change over time as the catchment changes, more monitoring becomes available or standards and expectations change.

**I support the range and type of investment needs identified in the five Investment Plans**

(3) Disagree

**Please explain your answer:**

There isn't sufficient detail in the plan to be able to understand investment needs properly. Many of the actions that are identified are to do additional modelling to understand the risks and options better. There appears to be a significant level of uncertainty and it is not clear how the risks and investment needs may change as the catchments are better understood through this modelling.

Many of the actions that are indicated to be delivered in the short term, appear to be of the old-fashioned type, eg more storage to prevent CSOs. Whereas we were hoping that the DWMP would move away from this approach and utilise nature-based-solutions. We would be grateful for more explanation about how some of these investments were determined to be best value, especially given the commitments in the DWMP to moving away from short-term engineering solutions and to adopting a whole-life approach. We appreciate that there is a need to meet certain targets, which may be in the short-term, however, we would be appreciate more detail about different scenarios.

There are also no commitments to collaborative delivery in the DWMP. We would be grateful for more details about how the objectives of the DWMP will be met through collaboration and how you plan to work with partners to deliver the plan. KCC is not in a position to support the investment needs at this stage and we do not feel enough information is presented that the proposed options represent the best scenario to deliver the objectives of the DWMP. We would be grateful for more details on alternative options and how this set of options was determined as the preferred option.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

(c) Ensuring storm overflows operate only in unusually heavy rainfall events everywhere

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(2) Agree

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

We are pleased to see the commitment to wider objectives, value based investment and collaborative working.

**What do we need to improve in our DWMP?**

We would like to see more details about alternative investment scenarios presented so that we can see how these compare to the proposed investment plan.

We would like to see how you intend to deliver on these commitments, we cannot see any commitments to collaborative delivery, and the investment options that have been prioritised appear to be similar to the sort of options we would have expected prior to the DWMP.

ID 4040

Organisation East Sussex County Council

**Are you happy to be contacted about your feedback?**

Yes

**The main challenges for drainage and wastewater management are identified in the DWMP.**

(1) Strongly agree

**What do you consider to be the most important future challenges?**

Accommodating growth in the south east whilst adapting to climate change and improving aging infrastructure presents a set of considerable challenges to Southern Water.

It is, therefore, essential that the data underpinning the assumptions in the draft DWMP are accurate and up to date. The County Council, working with its colleagues in the Districts and Boroughs and utilising latest ONS data, develops population projections which serve as a sound foundation for service planning and local plan development.

It would appear that Southern Water, in developing its projections up to 2050, has not sought the advice of the Local Authorities even though they are best placed to provide relevant and accurate demographic data for their areas. This has implications for the accuracy of the assessment of need and, consequently what measures will be required to meet the challenges set out in this draft plan and to prepare for what will be increasingly higher standards set by government for the water companies over the coming decades.

Southern Wealden, Eastbourne and Bexhill form an area of growth for East Sussex local planning authorities and these areas drain to varying extents to the Pevensey Levels. Impacts on the freshwater protected habitat are of concern to the local authorities, and Natural England. As a Lead Local Flood Authority, we have seen an increase in the use of package treatment works to enable development on individual sites in this catchment. Meanwhile key wastewater treatment plants seemingly struggle to meet the demands of new development. Our concern is that these local treatment works are susceptible to failure and therefore sites should be connected to mains sewerage services as a matter of priority.

Whilst growth is an important influence on the investment decisions of Southern Water, the additional households it generates still only represent a relatively small percentage over the existing demand for waste water services in the region. A great deal of work is needed to manage current stresses on wastewater infrastructure let alone the additional challenges of growth and environmental change.

The County Council is delivering a Defra sponsored project – the Blue Heart – which is one of the twenty five Flood and Coastal Risk Innovation Projects (FCRIP) underway in the country. Focusing on Eastbourne and Southern Wealden, the county council is working with a range of stakeholders including Southern Water to deliver an integrated approach to water management with overarching objectives of mitigating flood risk and improving the resilience of communities. As a partner to this project Southern Water will be aware of detail, so it is unnecessary to rehearse them here. Suffice to say that the Blue Heart project seeks to secure a more cohesive approach to water management in the catchment, this will be achieved by a number of means but will include improving and refining hydraulic models and asset monitoring with the aim of better integration.

A key issue in this part of East Sussex is the combined nature of the public sewer, it is not possible to simply retrofit a

separated system in a densely developed urban area so innovative engineering and technological responses to the problem are essential.

However, this is a problem which affects all of East Sussex to a greater or lesser extent and given the level of investment required in this single area of Southern Water's operations we cannot see how the DWMP will address this issue without prioritisation. This means that our rural communities' risk being left behind.

Whilst the separation of surface water from the foul network is the DWMP's preferred option over the construction of holding tanks to manage the frequency of CSOs (as set out in the investment plans for the Region), there is no indication of how this can be delivered despite the commitment to improve quality and integrated nature of hydraulic modelling Southern Water's catchments. Although the Blue Heart offers a significant level of partnership support from the public sector, this is unlikely to be replicated elsewhere in the region given the unique level of investment provided by Defra to support the project.

However, for this project to be a success it requires genuine engagement on the part of its key partners.

**Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

(1) Strongly agree

**Please explain your answer:**

In principle collaboration and partnership working are to be welcomed. The East Sussex Local Flood Risk Management Strategy 2016 – 2026 promotes this as a way in which the Risk Management Authorities can overcome the increasing resource constraints facing us all. This does not, however, mean that such an approach is without obstacles and whilst the draft DWMP can see the positives of collaboration it does not appear to recognise the very real difficulties in making it a reality.

Such obstacles include the necessary commitment, and in turn resource, of the Risk Management Authorities. Developing and delivering projects in partnership often need more time to set up, more resources to manage and often operate under tighter deadlines due to the reporting requirements of each partner. In addition, staff resources are limited in RMAs meaning that engagement in one or more partnership project means that work is not done elsewhere.

This may appear to be at odds with our response to Question 3a and inconsistent with our own Local Flood Risk Management Strategy, but we feel that support for partnership working should be tempered by experience.

Nevertheless, what the draft DWMP seeks to achieve over its twenty-five-year lifespan can only be considered to be transformative and as such it will require the assistance of others to help identify and deliver demand side, catchment scale and innovative projects that are needed. Moreover, such transformation requires a significant change in how Southern Water interacts with Risk Management Authorities and communities.

**The priorities for future investment should be: My number 1 priority is:**

Sewer Flooding

**The priorities for future investment should be: My number 2 priority is:**

Sewer Condition and Groundwater Pollution

**The priorities for future investment should be: My number 3 priority is:**

Wastewater Compliance and Pollution

**The priorities for future investment should be: My number 4 priority is:**

Enhancing the Environment

**Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

(1) Strongly agree

**Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches**

(1) Strongly agree

**Please explain the reasons for your answers to questions 4 to 6 above:**

Q4 asks priorities to be ranked but this rather assumes that each priority for investment is independent of the others. But if pressed, officers consider sewer flooding as the primary issue. There are many communities in the county that have been adversely affected by foul networks being rapidly inundated during storm events. There are many reasons for this: infrastructure provision not keeping pace with growth and change, conversely other licensing and permitting regimes not understanding the limitations on the sewer network, “misconnections” to the foul water network by householders and businesses, the use of the sewer network as a general waste disposal system and asset failure, to name but a few. Whatever the reason, it is clear that storm water plays a significant part in a problem that manifests itself in either internal foul water flooding, foul water flooding of the public realm or untreated discharges to the freshwater and marine environments.

Due to the interconnectedness of water management a degree of repetition in our response is inevitable as are references to the Blue Heart project. Nonetheless, in developing a comprehensive understanding of water management in the Eastbourne and Southern Wealden Catchment, the Blue Heart project has the potential to assist Southern Water in its own work of developing smarter more innovative approaches to management of its own assets – the Network Digitalisation programme.

The Blue Heart also serves to provide an example (albeit an exceptional one) of how Risk Management Authorities need to be adequately resourced if they are to engage in meaningful partnership working to address waste water issues. The learning derived from the project will help inform national responses to flood mitigation and resilience, it will also provide a legacy including the evidence base necessary to develop business cases for works to improve complex urban flooding in the catchment.

This will take time and is only one catchment in hundreds that the company has to manage.

As well engaging in flagship projects such as the Blue Heart, Southern Water must reappraise its approach to engagement in the development process. Whilst, we have noted that effective partnership working requires resources and commitment to deliver change, this area of work can be considered as “low hanging fruit”, as all parties in the process wish to see that the infrastructure necessary to serve development is in place, and that unsustainable development does not proceed. We feel that a great deal can be done together in achieving more sustainable development when all parties engage at the right time and are able to understand each other’s priorities.

In response to Q6 we agree that a broader palette of solutions should be considered in managing wastewater. This will involve nature based and catchment wide techniques as well as more traditional approaches. Each catchment or location will have its own set of constraints and issues which in turn will determine the management response.

We are not aware of studies which can readily identify the benefits, locations, techniques, and costs either at the catchment or neighbourhood scale. Without this evidence base it is difficult to say that placing a uniform prioritisation on catchment and nature-based solutions will be a practical response.

**Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost.**

(1) Strongly agree

**Please explain your answer:**

Given the interconnectedness of the water environment and the scale of the challenges before it, it is difficult to see why Southern Water would consider least cost options. It could be argued that such an approach has been a significant element of the business plans of the privatised water utilities for many decades. As we have mentioned earlier in this questionnaire, the scale and breadth of challenges require an innovative response from Southern Water.

**The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase**

(5) No opinion

**Please explain your answer:**

This is a commercial decision to be made by Southern Water in consultation with its customers and Ofwat

**I support the range and type of investment needs identified in the five Investment Plans**

(2) Agree

**Please explain your answer:**

It is noted that the actions identified in the five investment plans are only deliverable subject to funding being secured, and consequently there is some doubt that the full range of actions necessary can be implemented. Nevertheless, the ambition of this draft DWMP can be supported.

**Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

First two

**The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan**

(5) No opinion

**(This question is optional for customers, but we would like environmental regulators to respond). Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

No

**Please explain your answer:**

**Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan**

(2) Agree

**What did you like about our DWMP?**

It provides a clear and comprehensive narrative on the nature and scale of the challenges the region faces.

**What do we need to improve in our DWMP?**

The issues of concern to the County Council are outlined in this questionnaire.

## Section 5: Written Responses

**ID 1060**

**REF: DM LCL 06092022**



Commenter type:

Stance: Object

**Comments**

I wish to make a further objection to APP/21/00893 based upon the recent guidance from Natural England regarding nutrient neutrality sent to Havant Borough Council in February 2022.

In NE's document "Nutrient Neutrality Mitigation Principles", section 3 says that "Spatially, consideration will need to be given as to the location of any mitigation relative to where the development will have its impact on the habitats site...". The section considers cases in which the wastewater discharge may be direct or indirect to the habitats site. However, in both cases the mitigation site and habitats site are both required to lie in the same catchment.

APP/21/00893 does not satisfy this condition in its updated nutrient neutrality statement (10<sup>th</sup> March 2022). The ramifications of not following NE's rule are outlined below.

Fig. 1. 2

The proposed development site for APP/21/00893 is at A in fig. 1. Wastewater from the development would be treated at Thornham Wastewater Treatment Works in West Sussex.

Thornham is reaching its volumetric capacity and needs to be upgraded to support future housing growth [1]. Its outfall (B in fig. 1) lies in the Thorney Channel in Chichester Harbour.

The Thorney Channel (C in fig. 1) is a habitats site which is under threat. Seawater flowing through the Channel floods a significant area (5 sq. km.) of intertidal zone (fig. 2). This intertidal zone suffers from problem growths of macroalgae, as with other intertidal areas in Chichester Harbour. Winter concentrations of dissolved inorganic nitrogen (DIN) in the Thorney Channel have exceeded the EA's Water Framework Directive good-moderate boundary for DIN on 5 of the 7 years in the period 2012-2019 [1].

In order to mitigate nitrogen produced from the development, the developer plans to plant woodland on Horsepasture Farm (D in fig. 1) on the Stanstead Estate. Horsepasture Farm is in a different catchment (Lavant (Hants) catchment) to the habitats site in the Thorney Channel. The small Ham Brook catchment drains to the Thorney Channel. These two catchments are not even adjacent to each other, as the Ems catchment lies between them.

In this case, it must be necessary to check that the coastal tidal system can move the water of low nitrogen content from the mitigation site coastal outfall to the habitats site, so that nutrient neutrality is achieved there.

Fig. 2.

The mitigation site outfall is at Langstone in Langstone Harbour (E in fig. 1). Water of lower nutrient content from the outfall may travel west into Langstone Harbour or east into the Emsworth Channel. The proportion travelling east is not known, but in order for it to influence the Thorney Channel, it would have to move from Langstone to Emworth (3 km), south down the Emsworth Channel for 3 km, travel east past Thorney Island for 2 km, then flow 3 km back up the Thorney Channel to reach the Thornham outfall, a total distance of 11 km (fig. 2). 3

It could certainly move down the Emsworth Channel on the ebb tide, but then it would meet a large body of water ebbing out of the Thorney Channel and the rest of Chichester Harbour, which would force it into the Solent (fig. 2). There it would be mixed with the general Solent waters. The same would be true for the water of low nutrient content that ebbed from Langstone Harbour. I surmise that the water flowing back into the Thorney Channel on the rising tide would be unlikely to have a lower nutrient content than before the mitigation took place. Meanwhile the nutrient outflow from Thornham WwTW would have increased if the Long Copse Lane estate was built. The nitrogen budget for the Thorney Channel would therefore be positive, which is what the law arising from the Dutch Case is designed to prevent [1].

In contrast, Havant Borough Council's approach is to treat the East Solent and Langstone and Chichester Harbours as a single unit which must be nutrient neutral. But this ignores the possibility that hot-spots for nitrogen could build up, as could happen in this case in the Thorney Channel, which has a significant intertidal zone of 5 sq. km. The law arising from the Dutch case does not specify a minimum area below which the law cannot be applied.

As justification for their approach, HBC rely on the statement in ref. [1] that it is possible to treat “Langstone and Chichester Harbours and the East Solent as a hydrological unit that has a level of exchange, predominantly at high tide”. It is indeed likely that there is exchange between Langstone Harbour and the Emsworth Channel (part of Chichester Harbour), but it is an untested assumption that the exchange extends to the Thorney Channel.

These two scenarios could be compared by undertaking a modelling study to check whether or not a hot-spot would develop in the Thorney Channel. This would involve a computer-based hydrodynamic tidal model driving a water quality model predicting concentrations of nitrogen in the Thorney Channel over many tidal cycles. It should include point sources of nitrogen from Thornham WwTW and the mitigation site outfall. The tidal model would simulate the currents moving the nitrogen around the Solent and Chichester Harbour. If, as I believe, the nutrient budget predicted in the Thorney Channel due to the proposed mitigation was positive, this would show the sense behind NE's rule that the mitigation site and habitats site should both lie in the same catchment.

I am a Senior Research Fellow in a University Department of Geography and Environment Science. In my work I have gained substantial experience working with tidal models in coastal areas.

Yours faithfully,

[Redacted Signature]

07/May/2022

*Reference*

1. Review of the Warblington Farm Mitigation Option for Nutrient Neutral Development in the Havant Borough. Report

ID 4052

REF: HDC CL 050922



**Horsham  
District  
Council**

Southern Water Services Ltd.  
Southern House,  
Yeoman Road,  
Worthing,  
West Sussex,  
BN13 3NX.  
dwmp@southernwater.co.uk

Our ref:  
Your ref:

Date

5 September 2022

### **Drainage and Wastewater Management Plan Consultation**

Dear Sirs,

Thank you for the opportunity to comment on the above consultation. Horsham District Council have been involved in stakeholder discussions with you and other partner organisations over the past two years to help inform the development of these proposals. We therefore recognise that this is the culmination of a good deal of detailed work. We have been grateful for the opportunity to be involved to date.

Our detailed responses to the consultation questions are attached. Overall, it is considered that the strategic context, planning objectives and baseline risk and vulnerability assessments that form the plans for each of the River Basin Catchment areas within District's boundary (Adur & Ouse River Basin and Arun & Western Streams River Basin Catchments) generally reflect and provide an overview of the drainage and wastewater systems in and accurately summarises the current performance of the sewerage systems. We are also generally supportive of the range of actions and approaches identified in the plans to ensuring that the challenges of drainage, flooding and protection of the environment are addressed. However we would question whether the targets are sufficiently challenging and whether they go far enough or fast enough in delivering environmental benefits and solutions.

As a general comment, would hope that it is made clearer in the final report as to how progress towards the objectives and targets will be measured or monitored. We would welcome the opportunity for further involvement in due course.

Yours faithfully,

[Redacted signature]

[Redacted signature]

**Horsham District Council**

ID 2011

REF: MNHPen 050922



### **Manhood Peninsula Action Group**

*Campaigning to protect the Manhood Peninsula from over development*

Website: [www.manhoodpag.co.uk](http://www.manhoodpag.co.uk)

Email: [manhoodpag@gmail.com](mailto:manhoodpag@gmail.com)

#### **Feedback on the Southern Water DWMP – 5 September 2022**

The Manhood Peninsula Action Group is extremely concerned at the current performance of Southern Water. We had hoped that the DWMP would address concerns over pollution and inadequate infrastructure as a matter of urgency. This is not the case. Additionally, the questionnaire appears to be structured without reference to qualifying text. This makes meaningful answers well-nigh impossible.

The document lists many proposals but lacks a positive delivery plan. Until that is in place, we are at risk of continual sewage discharges polluting our environment.

Our first concern is that local issues under Level 3, will not be addressed until Levels 1 and 2 are completed. This means unnecessary delays and that priorities will be diminished. Additionally, there is no mention of working with local community groups who understand the situation on the ground. This should be addressed urgently.

Throughout the document reference to time scales is concerning as many 'current issues' need immediate attention, but the DWMP process will consign them at best to the next 5yr business plan process, if they are approved. This is set against a problem/issue that the DWMP has acknowledged, and that further stress is being placed on by Southern Water's acceptance of more user pressure for drainage.

At Level 3 - Waste Water System Planning - it is stated that 97% of 'sewage' flow at storm event is in fact rainwater. This raises a significant point that has been stated many times to both yourselves, the Environment Agency and the Local Planning Authority on the effective capacity of WWTW and the mains system - calculations are as you know based on dry flow capacities that are invariably totally unrealistic not only to accommodate 'storm' events but any period of prolonged rainfall. These rainfall increases are to be expected as in many areas properties have combined drainage; and highway drainage is also directed to the sewer system. There is of course also inundation from groundwater. The figure of 97% rainwater content of storm overflows is grossly misleading as it can only be possible under very specific, short term circumstances – this claim must be deleted from any documentation or presentations as it is generally completely untrue. It is therefore unrealistic to base operational predictions of capacities on dry flow rates.

Whilst it is stated that consultation is made with the Tourist Board in respect of accommodation the basic units of static holiday caravans have changed radically in the last decade and in many areas are best described as chalets with amenities equal to a three bedroomed house and the wastewater flows that such a property would produce. Additionally, because the accommodation is typically occupied for most of the day usage is higher than a property where the residents are at work/school etc, and not using water in the property.

Greater reference needs to be made of the impacts of tourist accommodation in areas where often large concentrations of tourist use take place.

In the DWMP Summary it is stated that you have a long-term plan and sets out the process from Asset Management Plan 8, 2025-2030 and the next four AMP's for the period up to 2050. Whilst it is appreciated forward planning is essential, a much more detailed description of where SW intends to be throughout this period is required as issues such as climate change and the need for a comprehensive strategy to address the demands of the complete water cycle need explanation.

We are very aware of what can be achieved by an innovative approach and a move away from systems and practices that essentially date from Victorian engineering. The DWMP at least should indicate the direction of Southern Water but except for works within the scope of the current infrastructure the DWMP does not look to address the demands of a rapidly changing future.

The summary makes statements on costs - "to undertake planned works on just 61 of your 381 wastewater systems will cost £2 billion - address all 381 would cost an estimated £20 billion."

These figures would suggest a massive change in investment and moving dividend payments into capital works. It is concerning that what is needed is outside the scope of the industry as presently constituted and indicates a lack of adequate levels of investment since privatisation.

There is a significant backlog of investment in the current infrastructure which has never been completed and which this DWMP completely ignores. Much more investment is urgently needed NOW in the antiquated infrastructure to bring it up to the required capacity to meet the current loading. All this DWMP will do is to superimpose new investment on top of an inadequate infrastructure – and thereby making the current poor situation considerably worse.

**Investment Plan for Sewer Flooding:**

The three solutions are supported but in respect of "Customer Education", wet wipes and other items that are not broken down in water, should be banned in agreement with manufacturers. Additionally, the banning of disposal of oils and fats partly from domestic but mainly from commercial premises could be more actively addressed.

Improvements to critical wastewater pumping stations and WWTW are crucial as it would appear that in many areas e.g. Sidlesham, WWTW network the infrastructure installed in 1987 was a minimum specification and installed within very tight budget limits. Increased pressure from additional connections and the decline of the efficiency of plant are now significant factors in the failures of the system. Specific mention should be made of the size/capacity and condition of the connecting mains system.

**Risk of sewer flooding in a storm:**

Within the scope of addressing this issue a calculation of storage volume that can be contained within a drainage system is postulated - there are 121 systems this applies to. It also stated that the calculation of volume can also be used as an indication of how much rainwater needs to be removed to achieve the same effect.

You indicate the main purpose of storm overflows is to prevent property being flooded - there is therefore a predictive correlation that where the storage capacity within a system and/or how much rainwater needs to be removed is known to avoid homes flooding. It would appear therefore that, unless at least within the 121 systems mentioned, containment or extraction is possible, that exclusion of excess water will always occur via the storm overflow. This suggest that their use is not an exception but part of 'normal' operational practice and would explain the excessive number of instances of discharges of 'untreated' although diluted sewage that are occurring when there has been no exceptional rainfall. These overflows are illegal and must be treated as such.

**Groundwater Pollution:**

This section mentions pollution from leak out from sewers, however our local issue concerns inundation that is not covered elsewhere. The discharge to wetland is of particular concern. It is stated that where deep sewers closest to the groundwater zone are sealed, their land drain function is removed, which may cause more nearby surface sewers to flood. You say you are investigating alternative approaches such as discharging excess, very diluted flows to be treated by natural based solutions such as wetlands. In what areas are you proposing to apply this solution?

In areas such as the Manhood Peninsula where groundwater is constantly high, the problem of sewer inundation is an on-going problem, however its exclusion will possibly lead to significant surface water flooding. Additionally, discharge of excess water through wetlands raises significant issues of further pollution of highly sensitive wetlands increasing, for instance, increased nitrate deposits. The only solution for the Manhood is the storage of storm water (rainwater generally) with the retention of a degree of inundation. This calls for a collaborative and integrated approach on the surface water groundwater and sewage system management between yourselves and the Lead Local Flood Authority?) that unfortunately does not currently operate well. An effective LLFA is seen as a critical need by local communities across the Manhood.

**Overflows:**

The proposals you mention need integration with other parts of the plan where storm overflows are a central point of concern in the overall drainage system. It will be essential

that the work of your “Storm Overflows Task Force” reflects the issues of problems that exist in complete systems. Government targets for solutions offer time scales that are far too extended and the environmental damage from their continued operation will be irreversible. More immediate action is required: often the discharge is an end result of a failing drainage system which requires coordinated action amongst a number of authorities – where is this being proposed?

**Environment:**

It is very apparent that current EA permits are producing pollution levels from WWTW that are having damaging and if Natural England’s studies for areas such as Chichester/Langstone Harbours and partly completed for Pagham Harbour are considered the impacts may be irreversible. Greater integration of SW’s operation into the wider water cycle and the impacts of climate change is urgently needed.

Whilst it is appreciated SW have a specified range of responsibilities and functions the overall structure of the ‘Water Industry’ lacks an integrated approach and the tendency to work in ‘silos’ needs to be ended.

Specific proposals for works within the Arun and Western Streams Catchment for the Manhood Peninsula and for adjoining areas are supported, particularly storage proposals. However, the time scales for implementation need condensing with, in many instances, immediate implementation.



ID 2012 - 15

REF: IWLMA CL 02092022

**LOWER WAITES LANE ROAD MAINTENANCE ASSOCIATION**

02.09.2022

I am writing in response to the public consultation in Summer 2022 in relation to Southern Water's **DRAFT Drainage and Wastewater Management Plan** (the DRAFT DWMP).

I am doing so in my capacity as the Chairman of the Lower Waites Lane Road Maintenance Association which comprises more than 100 households in the Cove area of the village of Fairlight in East Sussex. We are a voluntary association which primarily exists to repair and maintain the surface and infrastructure of Lower Waites Lane and its spur roads, all of which are unadopted. For several years our members, have become increasingly concerned at the appallingly inadequate state of the sewerage and drainage system for Fairlight being provided by Southern Water. This problem has led to extensive correspondence and several meetings with engineers and senior management of Southern Water.

The history of those dealings to March 2022 is summarised in a letter dated 25 March 2022 which I submitted to the Planning Inspectorate in relation to a recent planning appeal concerning a proposed new housing development in Fairlight. We objected to that new development of 43 additional houses in part on the grounds that it would only make worse the existing sewerage system which requires comprehensive repair and investment. I attach a copy of that document for your information: re Planning Inspectorate APP/U1430/W/21/3283287: Land East of Waites Lane at Wakeham's Farm, TN35 4ED. I am pleased to report that the appeal by the proposed developer was dismissed by the Inspector on 4 August 2022, in large part in recognition of the severe problems that we face in Fairlight with the current sewerage and drainage system supplied by Southern Water. A copy of that Decision is attached for your information.

**Background**

The main sewer for Fairlight runs the length of Lower Waites Lane and is meant to be maintained by Southern Water in a proper condition.

There have been sewage overflows on numerous occasions in recent years and whenever there is heavy rain - with raw sewage escaping on to the roadway and footpaths and discharging into the stream which runs along the side of Lower Waites Lane and into Stream Lane, which itself joins up with the Pett Level Road. That stream is thereby heavily polluted and represents in our view a serious health hazard. The pollution has been shown to be having a major adverse impact on biodiversity in Fairlight and the surrounding areas. Southern Water have known about these problems for more than a decade and yet nothing of any substance has been done to improve the system.

**Comments on the DRAFT DWMP**

1. I note that the DRAFT DWMP is written in extremely general terms. It gives the appearance of a box-ticking exercise rather than a comprehensive analysis of the problems in any particular location. I will illustrate this by reference to the sparse references made to the need for improvement works in Fairlight.
2. The section on developing the DWMP indicates that the process ought to have included a risk-based catchment screening (RBCS), which should have been completed at the "outset of developing a DWMP". I understand that the RBCS is used to identify where a sewer catchment has a current and/or potential risk or vulnerability, so that effort can be focussed on understanding the risk and why it is likely to occur. The timetable shows that in autumn 2021 there should have started early consultation with customers on the

catchment based DWMP. However, it is clear that in Fairlight this crucial early-stage consultation to develop the DWMP was not carried out with local customers. There has been no explanation provided as to why this is the case.

3. The Report on the 2021 DWMP Stakeholder Consultation written in January 2022 admits that the previous draft Plan in 2021 did not include any consultation with customers. This is admitted at paragraph 3.3.3. Indeed, it is apparent from page 8 of that Report that of their 4.7 million customers SW received responses to the then draft Plan from only 10 customers – all of whom were critical of the Plan and of SW's performance. The Report in Part 5 acknowledges that the customers who responded were *“disappointed with [SW's] recent performance in protecting the environment and are not confident in [SW's] ability to meet and address the future challenges of growth and climate impacts.”* Recent events provide strong justification for this conclusion.
4. The alleged reason for the lack of consultation with customers in relation to the contents of the then draft Plan was that the matter *“is highly complex so we did not actively invite responses from customers for this mid-term consultation”*. The result of this deliberate failure to consult means that we are now faced with an inadequate Draft DWMP which has been drawn up without reference to the views and needs of customers and in ignorance of local knowledge. The assumption that customers are all too stupid to understand the issues (as explained in paragraph 3.3.3 on page 8 of the document) is wholly unacceptable. To produce a comprehensive Plan that makes sense, the input from customers who use the system is essential. The excuses provided by SW are reprehensible: see e.g., the suggestion in that paragraph that focus groups *“have told us that our customers: think it is sufficient to know that there is a DWMP and to leave the detail to Southern Water and relevant agencies”*.
5. These paragraphs provide no excuse for the lack of proper consultation by a company whose track record in relation to these wastewater management issues is notoriously bad. Indeed, that is reflected in the fines imposed on Southern Water by OFWAT.
6. Regarding the specific position of Fairlight, this association in its dealings with Southern Water have been informed on several occasions that they recognise the need for urgent action to rectify the sewage problems we currently face. There have been at least four meetings with senior engineers and their staff and two with a main Board Director, Dr Toby Willison, SW's Chief Environment and Sustainability Officer, to discuss the need for rapid improvements to the system - which everyone we have dealt with admits lacks the capacity to service the existing number of homes in Fairlight.
7. I quote from a letter sent to me on 27 September 2021 by Ian Parsons of the SW Executive Review Team who wrote:

***“It's been identified that we need to upsize the sewer to stop flooding, however, this would require major investment. Unfortunately, when substantial investment is required, a fast resolution isn't possible. We approach our Engineering Team, to look at possible repair techniques. We look to understand the method and cost of repairing the asset. We prepare a final business case to understand the priority of this, against other sewer replacement needs across the business and if funding is available for such a solution. At present, I'm unable to advise on a timescale for the development of the area, due to the above processes we must follow.”***

8. Subsequent meetings with SW have taken place since this letter, at each of which SW have admitted that the existing system is inadequate and lacks sufficient capacity to cope with the sewerage and surface water of the area.
9. The most recent meeting took place on Friday 10 June 2022 when we met once again with Dr Willison and Phil Ritchie, County Engineer, to discuss what were promised to be SW's proposals for improvements to the system. Such improvements we know will involve:
  - (1) Replacing the piping in Lower Waites Lane – which is only 175mm in size- with larger pipes
  - (2) Replacing the storage tanks at the top of Lower Waites Lane to increase their capacity
  - (3) Expanding the capacity of the local sewerage plant at the Fairlight/Marsham Treatment Plant, which is located along the Pett Level Road just outside the village on the road to Pett Level and Rye Bay.

10. These discussions and the acknowledgement by SW of the inadequacy of the current system are completely ignored in the various references made to Fairlight in the DRAFT DWMP. I have been able to locate only 3 references to our village:

- 1) **FAIR.PW01.3:** On page 9 of the Investment Plan for Storm Overflows refers to a figure of £1,000,000 for Fairlight WTW to *“Attenuate excessive flows in sewer network using storage tanks to reduce the risk of spill event. (Cost based on storage but surface water separation is the preferred option)”*

The reference is included in Risk band 2 on a short to medium indicative timescale. It is claimed in the table that the average spills in the period 2017-2019 are only 49. That figure is way below the actual figures and does not reflect the current situation. Indeed, it is unclear why the report is based on figures which run from 2017-19 when SW should have had more up to date ones. The reason for both errors is probably because the recording equipment wasn't working properly and failed completely after 2019 as was admitted by SW at our last meeting. This has placed Fairlight much lower in the list of priority cases in the Summary table. That is most unfair.

As regards the indicative costs of £1,000,000 no comfort can be derived from this figure as it is used as the indicative costs for the vast majority of schemes listed. That shows that there has been no credible, precise analysis of the precise needs of Fairlight. Moreover, the work described in the DRAFT DWMP does not reveal or reflect what has been widely discussed with SW in the various meetings that this association has held with their engineers. I can find no reason for this discrepancy.

- 2) **FAIR.OT01.2:** On page 17 of the “Investment Plan for Sewer Flooding” document, under reference FAIR.OT01.2 in the Prioritised Investment Needs summary table for annualised flood risk (PO7), Fairlight is shown as needing a “Study: Model improvements, including flow surveys for storm and dry weather flow, and model calibration”.

This study has an indicative cost of £125,000 on a “Short” timescale, but this is yet again just a standard form of wording used throughout this table. There is no indication that the figure has been based on any analysis rather than just being plucked out to the air. More importantly, once again the insertion in the table does not reflect current reality. We were informed by Dr Toby Willison of SW when we met him in June 2022 that Stantec had been engaged by SW to carry out an immediate study of the sewage system in the Fairlight catchment area. Our committee has been asked to meet with representatives of

SW and Stantec, SW's consultant engineers, at a meeting on Thursday 8 September 2022 so that we can show them the area and explain the problems to them in detail. Our next follow up meeting with Dr Willison and his team is fixed for Monday 19 September 2022 in Fairlight. We are expecting from those meetings some immediate progress towards the construction of improvements to the current system as the present situation is intolerable. We assume that the DRAFT DWMP has yet to catch up with these developments.

- 3) **FAIR.SCO3.1** A further sum of £150,000 has been designated for Fairlight in the Annex A: Prioritised Investment Needs for Pollution Risk (PO2) section. On page 12 under reference FAIR.SCO3.1 an indicative cost of no less than £115,000 is to be applied for "Enhanced maintenance: *customer education*" and in FAIR.PW01.2 the sum of £35,000 is indicated for jetting the pipes. The first figure is an irrelevance in the context of a system which has resulted in regular discharges of raw sewerage into the road, streams, and surrounding land whenever there is a heavy storm. The local population is fully aware of the pollution that has been taking place and needs to see action by SW rather than "customer education" on this issue. The second figure of £35,000 appears to be hopelessly inadequate and also no substitute for the investment in new sewerage pipes and storage tanks which SW has recognised as essential.
11. The other problem which has been entirely overlooked in the DRAFT DWMP is the lack of capacity at the Marsham/Fairlight Treatment Works at Marsham Farm, which lies close to the village. We have been informed by our former local councillor, Chris Saint, that on a visit to the Treatment Works in 2018 he was informed that the plant has a capacity to cope with wastewater from a village with 1,500 inhabitants. The residents of Fairlight now number close to 2,000 people, hence the lack of capacity at the plant. Cllr Saint gave a statement to the recent Planning Appeal referred to above in which he explained the adverse impact that the lack of capacity and frequent discharges were having on the neighbouring village and surrounding areas of Pett Level which he represented. A copy of Mr Saint's statement is attached.
12. Accordingly, there is an urgent need for substantial investment by Southern Water in the Fairlight Treatment Works, the capacity of which must be increased to cope with the existing and growing population of the area.

#### Conclusion

The DRAFT DWMP in so far as it refers to the problems of Fairlight is wholly inadequate, out of date and lacking in particulars. It omits specific detail and underplays the acknowledged sewerage and drainage problems of the area. Southern Water should have spoken to local customers in advance of producing such a report. Instead, they have produced a hopelessly inferior document, simply for the purposes of meeting the statutory requirements.

Please acknowledge receipt of this response.

Yours sincerely

[REDACTED], Lower Waites Lane Road Maintenance Association

ID 4049

REF: EA Anx 050922

## Environment Agency response to Southern Water's Drainage and Wastewater Management Plan

### Annex 1 Further Commentary

#### A1 Stakeholder engagement

The (Water UK) framework for the production of a DWMP and Defra's guiding principles place significant emphasis on engaging and collaborating with stakeholders on the development of the DWMP, with the additional expectation of co-created solutions. The plan states Southern water collaborated with over 180 individuals from 75 organisations, and experts from across the industry to develop the draft DWMP. The company ran eight sets of engagement workshops and webinars as well as hosting 41 meetings to identify the unconstrained options for 61 wastewater systems (Level 3). Southern Water's engagement has been impressive and has been of the Engage, Deliberate, Decide (EDD) variety as opposed to Decide, Announce, Defend (DAD). SWS created strategic planning groups (SPGs) for each Level 2 strategic planning unit, as suggested by the Water UK framework, involving all the principal stakeholders. SPGs were engaged for each Strategic Planning Unit (river catchment) at RBCS, BRAVA and ODA. Each Level 2 plan contains a section on the organisations that were engaged with during the process. Overall, there is a level of transparency in the detail of the engagement documentation. We were also pleased to have the opportunity to contribute to more strategic webinars and we have valued the regular meetings that the company has held with our Southern Water Account Manager. EA teams have been engaged with the development of BRAVA methodologies for the bespoke planning objectives again emphasising Southern Water's willingness to collaborate.

Despite the very good engagement there was some disappointment from EA teams with the final product, that some recommendations and comments made in the ODA workshops don't seem to have been incorporated into the plan. In particular we note the company's reticence in proposing blue/green solutions.

Looking forward, Southern Water also needs to consider the maintenance of the stakeholder relationships that have been formed in the development of this DWMP. We suggest that progress with the delivery of the plan, and the improvement being made to the company's performance will need to be shared at regular intervals with the stakeholder community. There needs to be more than the annual update to Defra and will be essential to producing a high quality DWMP in five years' time. We would encourage Southern Water to keep this draft DWMP as a "living document", to enable more solutions to be taken on board over time.

#### A2 Planning Objectives

Southern Water has adopted the six national planning objectives plus an additional eight bespoke planning objectives covering a wide range of environmental outcomes. We commend the company for developing, through stakeholder engagement, this wider range of socio-economic objectives enhancing the range of the plan. PO9 (Achieve good ecological status/potential) and PO12 (Reducing groundwater pollution) were proposed by the Environment Agency and a further four were 'partner proposed'. Four planning objectives (PO: 9, 11, 13 and 14) are dedicated to environmental improvement and identifying investment needs to reduce the risks from the drainage and wastewater system that could impact waterbodies, including bathing waters, shellfish waters and environmentally

designated sites. The development of the suite of additional bespoke planning objectives is testament to the company's constructive approach to engaging with stakeholders.

### **A3 Programme Appraisal and Investment Needs**

Although SWS has followed the source pathway receptor model and has evaluated financial costs to reduce the risks to Band 0 for all 381 wastewater systems by 2050 of £20bn there is no clarity on the type of solutions at summary (company) level. The detail does exist in the L2 plans where it goes to a level of detail of specific schemes. We couldn't see much evidence of nature-based solutions. The expenditure is dominated by addressing CSOs – many of these schemes were 'grey' but some were 'foul/surface water separation or build storage tank'.

The document clearly explains for this first cycle Southern Water has only represented its own investment needs. It will be important that subsequent cycles of the DWMP reflect the ambition and enthusiasm shown in the external engagement workshops, by detailing shared solutions and projects. Appendix A shows how the environment has been considered in multi-criteria analysis for option selection.

While we note the desire for nature-based solutions/surface water separation, there is no commitment to these in the Plan. It appears that despite the emphasis on the source-pathway-receptor model most of the schemes identified appear to be to attenuate excess flows in sewers through upsizing and/or the construction of storage tanks. We expected to see greater consideration of Nature Based Solutions applied across the catchment scale including natural flood management (NFM) and sustainable drainage (SuDS) for attenuation and possibly treatment (where evidenced appropriate), especially in areas where we are also undertaking investigations.

Southern Water presented multiple investment scenarios (their 61 highest priority wastewater systems/all their 381 systems, reducing risk bands/reducing risk bands to Band 0 and with/without planning objectives 4 & 7). To reduce risk for all Planning objectives to Band 0 for all 318 wastewater systems a cost of £19.6 billion has been identified. It is not clear to us what is Southern Water's preferred plan. It is interesting to see the costs broken down by Planning Objective (Figure 20, page 70) but we would also have liked to have seen the costs broken down by option type. We assume that company's final DWMP will include its preferred plan.

### **A4 Stormwater overflows**

Southern Water has provided a limited level of transparency and detail for how risks of storm overflow spills (especially future risk with climate change, growth and urban creep) have been reached. The plan provides the outputs for the baseline risk and vulnerability assessment (BRAVA) to reduce total spills; however, the Defra Storm Overflow Discharge Reduction Plan targets provided by Southern Water in the initial assessment of options did not translate into their final investment plan and lacked detail on how these targets would be obtained through an achievable trajectory over asset management plan periods. This was particularly noted for the third target where overflows must not discharge above an average of 10 rainfall events per year by 2045 (for high priority sites) and 2050 (for the rest of the total overflows), with screening of all overflows.

It was also disappointing to see a lack of consideration for nature-based solutions to address storm overflows within the investment plan, which are only referred to meeting the 20-spill standard, not those detailed in Defra's Storm Overflow Discharge Reduction Plan.

A greater level of transparency around Southern Water's appraisal method (both for option development and overall programme) would provide a greater insight into the cost and benefit

calculations for different options that inform best value plans. It seems for storm overflows this has been driven by capital costs without capturing the multiple benefits and synergies across planning objectives green infrastructure could provide. However, it was noted that following company engagement with the EA, groundwater pollution issues were developed and assessed as a bespoke objective which we welcome. It would be appropriate to include a section on risks from storm overflows to the groundwater environment too.

Finally, companies were expected to include details of how they would implement a robust monitoring programme (both continuous water quality and event duration monitoring) to inform adaptive management, this detail has not been provided by Southern Water.

#### **A5 Flood and Coastal Erosion Risk Management**

*This reflects Southern Water's Drainage and Wastewater Management Plan (DWMP), principally in relation to consistency with the National Flood Coastal Erosion Risk Management Strategy (FCERM) 2020 and flooding interests. This is comprised of National and Area views from Partnerships and Strategic Overview teams*

We welcome reference to the National Flood and Coastal Risk Management Strategy within the strategic context references made in the draft DWMP and can provide good feedback on the proactive engagement that our local Partnership and Strategic Overview teams (PSO) had in the early stages of the development of the plan. We also agree with the BRAVA risks identified for the planning objectives assessed within the plan.

DWMPs are Strategic 25-year planning documents however our expectation was that more detail would have been available, to enable comments to be made on the programme appraisal stage. A lack of detail within the plan makes it difficult to understand how options that deliver multiple benefits are being considered or how the outcomes will be realised. For example, for the IoW catchment, within the 'specific investment need' section you identify where works should be prioritised in Ryde, Cowes and Newport. Costs are provided to show the level of investment required. However, it is not clear how this will be achieved i.e., through SuDs features. At what point will this level of detail be shared with stakeholders/partners?

The investment needs documents are helpful, but again do not contain necessary detail. Within the Adur and Ouse plan there is recognition the hydraulic overloading can be tackled at source. However, this is not reflected in the measures identified within the investment plan. Whilst there is acknowledgement of surface water separation and this is an important strategic solution, it would be helpful to see more reference to catchment wide measures such as land use change, payment for ecosystems service or upstream natural flood management options within the investment plans. Investment options appear to be very network focused, looking at attenuation of excess flows in the sewer network, without consideration of wider catchment flood alleviation measures which may be best value options for both customers and the environment.

The draft plan commits to being collaborative and strives to achieve multiple benefits when identifying measures. Within the level 1 plan we can see the positive intent with reference to the use of the evidence base in the BEST tool. We expected to see greater consideration of Nature Based Solutions and natural flood management (NFM), especially in areas where we are also undertaking investigations. For example, in the New Forest catchment as part of the options development generic options of NFM, land management and SuDS are included however, at Brockenhurst NFM as a measure was not carried forward into the investment needs. It has been highlighted at previous events, that the Environment Agency will be undertaking an NFM study at Brockenhurst, so it would

be helpful to see this option listed. For Slowhill Copse, the programme appraisal identifies suitable locations for NFM, and wetland creation is referenced. However, these are not referenced or referred to in the investment needs. It is positive that NFM, land management and SuDS are all included as generic options to mitigate flood risk, although these options do not appear to have been taken forward into the investment needs.

There is a strong ethos within the DWMP framework of collaboration and engagement with other RMA's. The development of bespoke planning objectives PI-10 on Surface Water management provides good evidence of you taking onboard partners views and adopting a whole systems approach., aiming to gain a better understanding of where there is a risk of flooding from both water company drainage and the systems owned and managed by others. We are interested to understand the detail of the 36 catchments that require further investigation, specifically the risk and the investment needs, as part of your DWMP development and how this will be included in your PR24 business Plan.

Water companies should undertake a high-level evaluation of wider resilience issues, specifically fluvial and coastal flooding, across all catchments. Southern Water reference their 'Resilience Action Plan'; however, no further detail is contained in the draft DWMP and we would have expected to see more granularity. We understand local discussions are being held between the Environment Agency and Southern Water, regarding the need to protect key assets from risk of landslips/coastal erosion and flooding. We feel this should be recognised within the draft DWMP. We will continue to work with Southern Water to ensure that key assets, such as Sandown and Eastbourne WwTW are resilient to climate change and sea level rise in the future.

One aspect not covered in sufficient detail within the plan is the increased future risk due to climate change and sea level rise, in-particular tide locking of outfalls discharging to estuaries or the sea. Taking an adaptive approach to making the right investment choices now for customers and the environment is crucial. Tide locking will be a significant risk with climate change. This risk doesn't appear to have been addressed in any detail and is of relevance in coastal areas where the tide locking of systems will become an increasing issue. The 'Hurst to Lymington' and 'Redbridge to Lymington' FCRM Strategies should provide useful information on this specific issue. Future DWMP development should draw from these strategies, and we would like to see this considered for the second cycle.

Table 1 specific detail

SPU	Area	What the EA is doing
New Forest	Pennington	attenuation and reducing surface water flows into the wastewater systems should be investigated where applicable – road runoff attenuation, SUDs, NFM & WwNP. EA road runoff project.  EA Hurst to Lymington FCRM Strategy which is currently under development. This could have particular relevance to nature-based solutions to reduce runoff into wastewater systems
	Slowhill Copse	It would be beneficial for the current DWMP phase to work closely with the EA at Calmore. The fluvial flood risk at this location has been recently remodelled which may be of benefit to the DWMP process.

	Brockenhurst	The EA will be undertaking a two-year NFM study in the Brockenhurst catchment and there may be benefits to the DWMP process in identifying areas where surface water runoff into the wastewater system could be reduced.
Test and Itchen	River Itchen Flood Alleviation Scheme (RIFAS)	is currently under development and I would recommend that this cycle of the DWMP process be involved with this large FCRM scheme in Southampton to determine whether mutual benefits could be identified and delivered.
IoW	Binstead and Gurnard	Here detailed options are being looked at for urban suds and reducing the amount of surface water entering the CSO. It is likely that lessons learnt will follow on from the projects.  When separating surface water from the combined sewer it will be important for Southern Water to show that this will not increase the risk of flooding to third parties. The EA are currently working with SW to agree a methodology on how this can be done at Gurnard.

## A6 Water Resources

### Demand forecasting

We welcome the clear linkages between the DWMP and WRMP in respect of demand forecasting. The DWMP takes account of Local Authority Growth projections (in line with regional WRSE plan and then WRMP and WRPG) but it would be good to know if SWS has included any sensitivity testing around this projection. WRSE has also looked at ONS, and a Housing max scenario, assuming all houses planned are built. The technical note references the WRPG for WRMP and aligning with the Local Plan forecasts and states some trend-based forecasting is also being undertaken (but limited details on this) and will look to develop further for future DWMPs.

The company states that *We have aligned our DWMP with our Water Resource Management Plan (WRMP), and used common planning assumptions and data, for example on growth and climate change.*

Page 24 (Technical summary) – We welcome the reference to PCC targets and ‘Target 100’ and impact on future domestic sewage flows. SWS could state when it plans to meet Target100 (by 2040). The DWMP could link more strongly to the WRMP and SE regional plan here especially as demand management is such a big part of the first 5 years of the regional plan (and therefore expect to see that in the DWMP too). SWS needs to ensure the DWMP is updated with latest demand forecasts for WRMP/Regional plan we are aware that SWS has been looking at providing updates for that for WRSE and WRMP24.

### Water Re-Use

Page 25 – It states a proposal *to further align with water resources and wastewater strategic planning to explore additional opportunities for greater recycling and re-use of water in the South-East.* We would expect the 2 plans to be in **full alignment** for re use schemes.

Rainwater separation – encouraging customers to capture and store more rainwater for water quality reasons makes sense, but we would be interested in seeing more detail about how this would work in reality (and the linkages to the WRMP and demand management options)

#### Catchment schemes

Page 49 SUDs, we would be interested in seeing more detail on catchment schemes and where they could have multiple benefits. This is especially relevant as water companies have been having discussions with the EA and Ofwat over which plan is appropriate for catchment schemes to reside. The wording in WRSE is as follows:

*We are supportive of catchment schemes within the WRMP. It would need to have a link to a supply/demand benefit (for example DO benefit, providing BNG for an option, or increasing resilience of a scheme or option) and be clear as to why it is relevant to include within a WRMP and not more suitable in a different plan. Companies should ensure they seek the appropriate funding route for the catchment schemes. In addition to details of catchment management schemes that provide a supply/demand benefit and are detailed in the WRMP planning tables, the WRMP narrative should clearly set out the benefits and the justification of inclusion within the WRMP.*

#### **A7 Climate Change**

We acknowledge the integration of climate change in the company's DWMP. Namely:

- The recognition of more intense rainfall events due to climate change impacting the frequency and duration of storm events resulting in storm overflows and sewer/surface water flooding.  
The desire to pursue blue-green solutions. One of the environmental benefits of blue-green solutions is that they are not carbon intensive options like their 'grey' alternatives
- Proposals to separate rainwater from 25 % of paved areas to offset climate change (rainwater separation, the most sustainable action long term)
- The Technical summary explaining in some detail how climate change has been assessed, considering a wide range of factors.

And we suggest the following areas for improvement:

- SWS applied the standard uplift of 20% for 2050 rainfall. Is there a more regionally specific figure to apply to Southern Water's drainage area?
- We could not find any reference to assessing the impact of climate change of the performance of WWTWs and suggest that this needs to be included in the DWMP.
- Although there is a reference to greenhouse gas emissions and the water industry's pledge to reach net zero by 2030, we couldn't find any specific commitment from Southern Water in the DWMP and what that means specifically for its drainage and wastewater planning.

#### **A8 Strategic Environmental Assessment**

The Southern Water Drainage and Wastewater Management Plan (DWMP) SEA Draft Environmental Report (ref080622v1) (Draft Report) sets out, as the Report states, 'some initial findings from assessment work on the Draft DWMP' and that the Environment Report will be updated and published alongside the final DWMP. As such, it is very much a 'work in progress' with some aspects that have not yet been addressed at all (e.g., cumulative and synergistic effects assessment) with other key areas which are still in development, e.g., establishing the environmental baseline which the Draft Report states (in Section 1.4) is 'a high-level review of conditions within the Southern Water area of operation'. The Report cannot be read as a stand-alone document as many details require

cross reference to other documents, including to the Scoping Report e.g., for details on which plans, policies and programmes have informed the assessment.

In several sections of the report there is reference to action being needed to update information in the Scoping Report on these aspects i.e.

- Environmental baseline (section 3.3).
- Plans, policies and programmes (section 3.4) - the Environment Agency provided comments on additional information for this which it is not clear has been addressed in the Draft Report.

In addition to these, the Draft SEA Report also sets out, in Section 7.2, other areas which it is acknowledged need further development i.e.

- Further work to identify likely significant effects (Level 2)
- Completing other assessments and using the outputs to feed into the SEA findings
- Undertaking the cumulative assessment
- Identifying mitigation measures to address likely significant effects and developing proportionate monitoring proposals

As the Draft Report is 'work in progress' it is not clearly set out how the assessment has informed the development of the Draft DWMP.

With the above in mind, it is difficult to determine the significant effects of the draft plan, how these effects will be mitigated and monitored, and how the SEA has influenced the development of the preferred plan. Please can we be updated during the development of these aspects, prior to the finalisation of the final DWMP and SEA Environmental Report.

#### **A9 Groundwater**

We welcome the inclusion of groundwater as a risk that needs to be addressed by the DWMP and the inclusion of the Planning objective that provides that focus. Where there is loss of sewer integrity high groundwater levels will result in sewer ingress risking premature operation of storm overflows. But also, leakage from sewers into the environment can contaminate groundwater and it is pleasing to see this recognised as a risk to be managed/mitigated. We have a few additional comments which we hope you will find helpful:

- When considering "groundwater sources at risk from wastewater" it is important to consider all water companies abstractions from Southern Water's drainage area equally rather than just those operated by Southern Water.
- We welcome the flagging up of emerging concerns and considering future needs for first time sewerage.
- The section on enhancing the environment includes work to enhance the ecology of streams and rivers (PO9), solutions for nutrient neutrality (PO11), improving bathing water quality (PO13) and improving the quality of shell-fish waters (PO14). It would be worth looking through the proposed work programme to see how many of the sites identified for these planning objectives could also help protect the groundwater itself, or other water receptors via groundwater too, to add further weighting.

We also have some more detailed technical comments related to groundwater which we will send through to you after this consultation response.

ID 4044/5

REF: WBC 050922

**Southern Water DWMP Response from [REDACTED] and [REDACTED] for Worthing Borough Council**

<https://www.southernwater.co.uk/dwmp>

[dwmp@southernwater.co.uk](mailto:dwmp@southernwater.co.uk)  
[REDACTED]

Thank you for consulting us on Southern Water's Draft Regional Drainage and Wastewater Management Plan (DWMP). We are grateful for the opportunity to be involved throughout this process.

Our local water environment is valued as an environmental and recreational asset as well as a critical resource. SustainableAW is a shared climate and nature plan between Worthing Borough and Adur Councils and the wider community, to create a more sustainable future for our area, this recognises water as a key action area with a commitment to improve water quality and reduce consumption.

For wastewater purposes both Adur and Worthing fall within the Adur and Ouse catchment. Worthing Borough Council welcomes Southern Water's admission of failures on pollution and wastewater management (p23). We agree that causing our environment no harm through pollution incidents is the bare minimum we should expect from Southern Water. We are committed to working proactively with Southern Water to prevent issues occurring that could harm our environment.

We are pleased to see that the impact of growth and planning has been identified. As you will already be aware through our discussions with you the emerging Worthing Local Plan is nearing adoption and as set out on page 24 of the Draft, we would expect that the DWMP is updated to reflect the allocations within this document once adopted.

We agree with the list of main challenges on starting on page 10 of the DWMP. However, under Challenge 2: Population Growth we would expect the text to recognise the role of Local Plans in allocating development sites and the presence of significant shortfalls in meeting local housing needs across the area. Furthermore, the text notes that '*development... leads to more frequent overwhelming of our sewer systems and an increase the risk of flooding.*' Whilst we recognise that more homes and more people will increase flows to the sewer network, the text should recognise that national planning policy requires that development does not increase the risk of flooding.

Planning for the Future - Challenge 5: Keeping rivers, lakes, reservoirs and coasts healthy and clean (pp11). We are pleased to see recognition of coasts in the heading. However, we would recommend that reference to bathing waters is included in the text. Residents and visitors to Adur and Worthing value our coastline and bathing waters. Adur & Worthing Councils have previously committed to improving the quality of bathing waters and have worked with Southern Water on the Bathing Water Enhancement Program and include as a commitment in SustainableAW to obtain and maintain Blue Flag awards for the foreshore which requires 'Excellent' bathing water quality. Worthing Borough Council's intention is to increase the number of designated bathing waters to help achieve this and is currently pursuing a second application, with a third identified for the future.

We support the intention in the DWMP to move towards integrated and cross sector water management planning and the greater use of nature-based solutions and sustainable drainage systems.

The BRAVA results detailed in the Investment Plan for Sewer Flooding (pp.16-50), highlights the very significant risk identified in East Worthing (WOEA) with issues relating to the majority of Planning Objectives. Specifically; PO4 (sewer flooding), PO7 (flooding due to hydraulic overload) and PO10 (surface water management).

Information presented in the Strategic Environmental Assessment Draft Environmental Report (June 2022, pp.28), identifies investments Needs to address these issues;

- Control / reduce surface water run-off: Surface water separation, particularly at storm overflows in Worthing and Worthing Wastewater Treatment Works (WTW) (WOEA)
- Improve quality of wastewater: Customer education programmes (WOEA)
- Improve sewer network: Enhanced maintenance (WOEA)
- Improve sewer network: Attenuate excess flows, including new storage in Goring and Sompting
- Improve treatment quality: Review permit for the WTW for WOEA
- Studies: Drainage model improvements for WOEA

A key ambition of the new administration at Worthing Borough Council is to help separate rainwater from the foul sewer network, mitigating issues that impact storm overflows and risk sewer flooding.

We understand that collaborative relationships are the foundation to deliver rainwater separation and look forward to a detailed plan that brings key stakeholders together to start in earnest to achieve this in Worthing. We seek greater involvement with projects including SW Pathfinder projects to enable this.

Our expectation is that improvement work to existing models (including flow surveys for storm and dry weather flow, and model calibration to better model both sewer flooding and surface water flooding) at the BRAVA locations highlighted in the DWMP, are developed with a clear timetable, clearly communicated with regular updates from SW to the Councils.

We regret that the risk of drought has not been factored into the draft DWMP and see this as a missed opportunity. The draft DWMP only makes passing reference to drought in terms of climate change but offers no method of managing that risk. We would value a more holistic approach seeking to manage flood and drought risk together.

Retrofitting SuDS or separating combined systems is a new approach for the WBC and may be problematic but we are committed to separating rainwater at our public buildings, enhancing the urban environment with sustainable drainage solutions and encouraging and supporting residents to do the same. We aim to help mitigate climate change where we can by enabling sustainable water capture. Our Public Realm design work in and around our town center will focus strongly on this new ambition. We seek further detailed information to identify optimum and additional areas where SuDs and nature-based solutions can be implemented in a scalable way to implement bio-retention systems and look to Southern Water to significantly advise and financially contribute to this shared ambition.

Separating systems is very expensive and disruptive to our already occupied communities. Southern Water has indicated that they will be expecting contributions from LPAs, LLFA, EA

etc. Worthing Borough Council looks to Southern Water to financially assist this effort - including the provision of water butts for public buildings and domestic properties that will capture and harvest rainwater that can, in turn be used to sustain parks and green spaces. Inclusion of target sites in Worthing would make an ideal Pathfinder project to enable this. Engaging with householders to use water butts could be very successful.

We welcome and await the coming analysis to improve understanding of the investment needed into reducing CSO (Combined Sewer Overflows) spills and we will hope to see an outline for how Southern Water will fund this vital work in order to reduce the impact of CSOs through surface water management and separate foul and surface water drains in the most sustainable manner possible.

Increasing capacity of sewers may be the only deliverable option in some locations, this should be recognised and Southern Water should put funding in place for this.

In terms of future development, we recommend that Southern Water should align with the LLFA Surface Water Drainage Policy. In particular when considering proposals for development to utilise existing combined sewer connections we recommend Southern Water should require compliance with the SuDS hierarchy and where the combined sewer is the only option requiring greenfield QBar where possible, or as close to this as achievable with a minimum of 50% betterment.

We note with disappointment that a 1-in-50 year Annual Exceedance Probability model has been applied to the risk of flooding in storms (p44). Given the effects of climate change and the increase in prevalence and intensity of storms, we believe that an Annual Exceedance Probability model operating on a 1-in-75 year storm (or 1.333%) would be more suitable and sufficient in terms of operating within a sound risk based approach.

Where future development is located within areas of known high groundwater levels it would be sensible for Southern Water to request higher standards for sewers which reduce infiltration potential. It would also help collaboration if Southern Water's criteria for adoption of SuDS is also aligned with the LLFA policy.

On pages 52 and 53 it is stated that existing housing stock and infrastructure is the problem, and that future development should not be. In terms of existing housing, it is unclear how Southern Water can deliver improvements to existing housing and infrastructure.

We support the investment plan for storm overflows (Planning Objective 5). It is noted that a number of storm overflows have been highlighted as requiring investment in the Shoreham and East Worthing catchment areas in the short to medium term, between now and 2040. A clear timeline of deliverables is welcome to help improve reputation moving forward.

The draft DWMP acknowledges the recent media attention received as a result of storm overflow discharges which are stated as a yearly average of 45 for Shoreham and 43 for Worthing East catchment areas. The Council is understandably deeply concerned about the number of discharges and the negative impact this has on public health, the environment and designated bathing waters. The extent of recent discharge to coastal areas does highlight the need for more effective working with the LLFA and LA's to ensure a more robust approach towards SUDs and standards for new sewers as mentioned previously.

Worthing has one designated bathing water and has aspirations to have further areas designated in the future including at Sea Lane, Goring. An application for bathing status is

currently in progress for Beach House in Worthing.

Worthing Borough Council seeks to additionally sample water and make routine, daily observations along its 12 miles of coast to help monitor the functionality of the outfalls - following advisory guidance from Southern Water.

We welcome DWMP commitment to co-develop and co-deliver schemes. As such, Worthing Borough Council expects the continuation of quarterly meetings with Southern Water - the first of which resumed in June 2022 - to update on the Misconnection programme and outfall EDM and operational health across all outfalls in Worthing.

We hope these comments are helpful and we look forward to continuing to work with you on our Local Plans and other shared projects. If you have any queries or require further information please do not hesitate to contact us.

**ID 4050/51**

**REF: ADURDC 050922**

**Southern Water DWMP: Response from Adur District Council**

[dwmp@southernwater.co.uk](mailto:dwmp@southernwater.co.uk)  
[REDACTED]

Thank you for consulting us on Southern Water's first Drainage and Wastewater Management Plan (DWMP). We are grateful for the opportunity to be involved throughout this process.

Our local water environment is valued as an environmental and recreational asset as well as a critical resource. SustainableAW is a shared climate and nature plan between Adur District and Worthing Borough Councils and the wider community to create a more sustainable future for our area, this recognises water as a key action area with a commitment to improve water quality and reduce consumption.

For wastewater purposes both Adur and Worthing fall within the Adur and Ouse catchment. We are pleased to see that the impact of growth and planning has been identified. You will be aware that work is starting on the review of the Adur Local Plan (2017) and in particular the potential for higher numbers to be accommodated within the Shoreham Harbour Regeneration Area Western Arm (currently allocated for a minimum of 1,100 dwellings, but with potential for more). As a result, significantly higher housing numbers could result within the lifetime of the Plan. We would expect the DWMP process to take account of the plan-making process and ensure emerging proposals are taken into account.

We agree with the list of main challenges on starting on page 10 of the DWMP. However, under challenge 2: population growth we would expect the text to recognise the role of Local Plans in allocating development sites and the presence of significant shortfalls in meeting local housing needs across the area. Furthermore, the text notes that 'development... leads to more frequent overwhelming of our sewer systems and an increase the risk of flooding.' Whilst we recognise that more homes and more people will increase flows to the sewer network the text should recognise that national planning policy requires that development does not increase the risk of flooding.

Challenge 5: Keeping rivers, lakes, reservoirs and coasts healthy and clean. We are pleased to see recognition of coasts in the heading. However, we would recommend that reference to bathing waters is included in the text. Residents and visitors to Adur and Worthing value our coastline and bathing waters. Adur and Worthing Councils have previously committed to improving the quality of bathing waters and have worked with Southern Water on the Bathing Water Enhancement Program and include as a commitment in SustainableAW to obtain and maintain Blue Flag awards for the foreshore which requires 'Excellent' bathing water quality.

We support the intention in the DWMP to move towards integrated and cross sector water management planning and the greater use of nature-based solutions and sustainable drainage systems. However, we consider further evidence is needed to establish where opportunities best exist to accommodate these. Within Adur it is certainly unclear where any nature-based solutions could be implemented which will deliver the improvements necessary to reduce CSO use and flooding.

On pages 52 and 53 it is stated that existing housing stock and infrastructure is the problem, and that future development should not be. In terms of existing housing, it is unclear how Southern Water can

deliver improvements to existing housing and infrastructure. Retrofitting SuDS or separating combined systems is problematic. There is often insufficient space for SuDS. Separating systems is very expensive and disruptive to our already occupied communities. Southern Water has indicated that they will be expecting contributions from LPAs, LLFA, EA etc. Why funding should be provided by others, and how it can be is unclear. Increasing capacity of sewers may be the only deliverable option in some locations, this should be recognised and Southern Water should put funding in place for this.

In terms of future development, we recommend that Southern Water should align with the LLFA Surface Water Drainage Policy. In particular when considering proposals for development to utilise existing combined sewer connections we recommend Southern Water should require compliance with the SuDS hierarchy and where the combined sewer is the only option requiring greenfield QBar where possible, or as close to this as achievable with a minimum of 50% betterment.

Where future development is located within areas of known high groundwater levels it would be sensible for Southern Water to request higher standards for sewers which reduce infiltration potential. It would also help collaboration if Southern Water's criteria for adoption of SuDS is also aligned with the LLFA policy.

We support the investment plan for storm overflows (Planning Objective 5). It is noted that a number of storm overflows have been highlighted as requiring investment in the Shoreham and East Worthing catchment areas in the short to medium term, between now and 2040.

The draft DWMP acknowledges the recent media attention received as a result of storm overflow discharges which are stated as a yearly average of 45 for Shoreham and 43 for Worthing East catchment areas. The Council is understandably deeply concerned about the number of discharges and the negative impact this has on public health, the environment and designated bathing waters. The extent of recent discharge to coastal areas does highlight the need for more effective working with the LLFA and LA's to ensure a more robust approach towards SUDs and standards for new sewers as mentioned previously.

Shoreham is designated for bathing waters and the Council has aspirations to have further areas designated in the future including the river Adur. The Council already undertakes extensive water quality sampling on the river Adur in Shoreham and levels of Escherichia coli and Intestinal enterococci have been recorded at levels that are considered high and would have public health implications.

We would welcome the opportunity to set up a group to push forward river quality improvements for the Adur and ultimately achieve bathing water designation.

We hope these comments are helpful and we look forward to continuing to work with you on our Local Plans and other shared projects. If you have any queries or require further information please do not hesitate to contact us.

**ID 4042**

**REF: ADC 280722**

FAO:-  
DWMP Team Southern House Yeomans Road Worthing  
BN13 3NX

Arun District Council Civic Centre Maltravers Road Littlehampton  
West Sussex. BN17 5LF Tel: [REDACTED]

web: [www.arun.gov.uk](http://www.arun.gov.uk)  
email: [localplan@arun.gov.uk](mailto:localplan@arun.gov.uk)

28 July 2022

Please ask for: [REDACTED]

[REDACTED]  
Planning Policy &

Directorate of Place

Direct Line: [REDACTED]

Conservation

Dear DWMP Team

**RE: Drainage and Wastewater Management Plan (DWMP) consultation between 13 June and 5 September 2022:**

**Arun District Council response**

Thank you for providing Arun District Council the opportunity to comment on the documents forming the proposed Drainage and Wastewater Management Plan (DWMP) consultation.

This letter makes high level comments with respect to the above consultation, broadly based around the order of topics and consultation questions that are on your web site (<https://southernwater.co.uk/dwmp>), rather than necessarily, providing a detailed response to every question.

**Planning for the future**

The main points considered to be important currently, and going forward, from the Council's perspective, within the catchments falling into Arun District are set out below.

As an overarching point, it is considered that, the key priorities in the Arun Wastewater catchments, are addressing groundwater and surface water infiltration, associated with the high groundwater level and Arun's location on the coastal plain; in addition, maintaining and improving the chemical, biological and ecological statuses of the protected water bodies and nature designation sites in Arun District.

Addressing the issues identified above, will also be critical to reducing the occurrence and frequency of discharges from storm overflows from the network, so that existing and future designated bathing waters retain or improve to excellent standard.

Finally, and not least, is that progress on any of the above is not compromised through the accommodation of future growth within and cumulatively, adjacent to Arun. Indeed – Southern Water must align its capital forward planning for investment in the WWTW network in a transparent way with respect to the phased accommodation of housing growth set out in existing and emerging development plans; including allowances for cross boundary and windfall and background growth. Although the overall growth levels are set out in terms of each Wastewater catchment, the note containing this does not set out the exact housing figures this has been based on. For the purposes of transparency, this information must be included. This should be on the basis that the DWMP sets out a specific section on an ‘enabling role’ supporting development plan deliverability (and infrastructure viability) including through subsequent Statements of Common Ground. Currently, there are still barriers to this alignment, evidenced by significant time and resource expended by Southern Water and adjacent Local Authorities on resolving forecasting methodologies and confirmed timescales for investment.

The roles and responsibilities for water, protection of the environment and improving the management of drainage and wastewater infrastructure, cover a wide number of organisations, from the national, regional or local level down to individual landowners. It will therefore, be essential for Southern Water to collaborate with all stakeholders. Some suggestions for coordination of responsibilities are included in the following sections of this letter.

### Creating Resilient Wastewater Systems

In terms of future investment priorities, it is felt that these should be directed in the following order of priority:

1. Focusing on the outcomes of the Storm Overflow Force Taskforce, to ensure no reoccurrence of the discharges to bathing waters - as occurred during 2021 along the coast of Arun District
2. Detailed investigation of appropriate separation solutions and exact design (i.e. size and scale) of new storage tanks to be delivered within the towns of Bognor Regis and Littlehampton;
3. Prioritisation of investigating the practicalities of locating storage tanks in the Lidsey catchment to attenuate flows and reduce spill events
4. Reviews of permits for all treatment works within Arun District, especially the Summer Lane, Pagham works to ensure no detrimental impacts on the water environment of Pagham Harbour
5. Joint education programme and/or implementation of grant schemes directed at businesses in Arun around improvement of FOG (the industry acronym for Fat or Grease) management and installation of grease traps
6. Consideration of the scope to increase the design capacity of any further extensions or provision of replacement pipes, as needed to increase the network’s overall ability to accommodate growth

### Options and Development

The overall principle set out in this section is around separation of rainwater from the foul sewerage systems, where possible, to reduce sewer flooding and storm overflows and is roundly endorsed and supported. The issue of the frequency of storm overflow discharges particularly, has been bought up in repeated correspondence from this Council to Southern Water since December 2021. In answer to the previous question of priorities, it can be seen that this remains

a top priority for this Council. Furthermore, a number of the other priorities listed above are also linked to this issue. The Council would especially wish to direct Southern Water to priorities 2 and 3 listed above, which are connected to providing the confidence that the solutions to be delivered to address these issues, will be robust into the future. This needs to take into account the characteristics of the district, such as the high groundwater level resulting from its location on the coastal plain, and the known issues connected to groundwater penetration into the wastewater network that occurs.

The majority of Littlehampton and Bognor Regis are served by combined sewers, many of which have the majority of surface water flows coming from highway drainage. Experience of the Council, when it was involved with separating a small section of Littlehampton's network, was of it being complex and only dealing with a very small part of the system. Although it is appreciated that looking at a wider catchment level can help, this Council do not consider that it is appropriate for this approach to always be prioritised over traditional hard engineering solutions. The Council considers that the exact local characteristics and circumstances need to be factored in at the design level, particularly when dealing with predominantly existing built-up areas such as the Ford catchment.

It would, however, be suggested that a wider catchment approach may be appropriate, along with actions such as Permit Reviews, for new large scale proposals for example, within the Lidsey catchment and opportunities for integration of the Rife into the BEW development (because there will be less of the combined outflows and more space for delivery). The most appropriate collaboration that could be done in conjunction, would be providing specific technical input with both developers and case officers over site or catchment level actions to be taken, as a scheme/proposal progresses through the planning system. The Council would be glad for a pilot to be done focused on this approach. The pilot could then be used as a case study for others, either in a similar location on the coastal plain or where groundwater and surface water ingress is especially acute.

With respect to groundwater ingress/penetration, The Council would urge Southern Water to consider the cost/benefits of preventative action e.g. via a financial inducement /recompense scheme for landowners, including local authorities, to introduce infrastructure that reduces rainwater runoff into combined sewers. This would not only encourage of delivery of such measures but also potentially reduce cost of future corrective action so that it could be covered by savings (i.e. invest to save).

It has been identified that blockages can be one of the main reasons contributing to internal sewer flooding and the main actions to address this, being at source, best achieved through changing customer behaviour. It is suggested that Southern Water, in collaboration with the local authority (Arun) do a specific education programme targeted at food businesses generally within Arun district and/or consider grants for delivering improvements in FOG management e.g. through installation of grease traps etc. for existing businesses.

### Investment Needs

Though it is agreed that Southern Water should prioritise those options that provide multiple benefits, this should not be at the expense of ensuring that to last into the future long-term.

The Council is glad to see that many of the projects for the 3 catchments (Ford, Lidsey, Pagham) within its boundaries, are scheduled for the short-term period of 2025-2030, but would also wish Southern Water to consider and set out within the DWMP, those areas for collaboration and the further actions suggested in the previous section of this letter. Further, Arun would suggest that the comments made above in relation to collaboration, means that the DWMP should be referred

to in terms of partnership working and be given the same weight as other documents such as the Water Resource Management Plan. Specifically, the DWMP document needs to make it clear where the linkages are with intended actions triggered by planned growth in Arun, being addressed in these other plans (i.e. water recycling/treatment works extension at Ford; as set out in the Statement of Common Ground between Arun District Council and Southern Water in 2017).

The DWMP sets out the 3 DEFRA scenarios of; protecting the environment; protecting public health in designated bathing waters; and ensuring storm overflows operate only in unusually heavy rainfall events. Arun are glad to see this specific inclusion in the document and would wish this to be continued in the final DWMP. As an authority however, rather than disagree with any of the options as the questions ask, the Council would strongly agree that all of these aims are required.

Taking the above into account, it is important to address the frequency and incidence of discharges from storm overflows and in particular, the higher number of combined sewer overflows arising in the urban areas, impacting the number of existing and any future bathing waters. In his regard, the Council would prefer that Southern Water propose planning for and addressing all of the scenarios. It is recognised that there is still high uncertainty over the cost figures included within the DWMP on this topic, including with respect to associated impact on household bills. However, the following approach should be taken into account:

- Due to the number of chalk stream in its district, spillages should be minimised, taking account of the cost range in sensitive areas (chalk streams));
- That the 10 per year average may have to be moderated in order to reduce increases to household bills;
- That where storm overflows are recognised as the cause of reduced GES, that Southern Water take responsibility and through the DWMP, tackles this issue while ensuring that the impact to household bills is curtailed at the lower cost on the basis that the chief responsibility rests with Southern Water.

In summary, the Council welcomes that catchment wide options are being considered but would not wish this to be at the expense of traditionally engineered solutions, when taking local characteristics/circumstances into account at the detailed design stage. Arun Council's priority remains connected to the need to reduce the incidence and frequency of spillages from storm overflows. It has tried to provide some suggested areas of collaboration within this letter and to reflect its local knowledge and experience on key issues that could help improve the situation or delivery of the DWMP objectives.

This letter responds to the current DWMP consultation – however, in October and November 2021 the Council also set out key considerations as part of its early response. This is included as an appendix to this letter.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours Sincerely,

 (Team Leader Planning Policy & Conservation)

Arun District Council

CC:-

[REDACTED] Arun District Council

**Appendix 1: Letter 26 October setting out Arun early Comments on DWMP Process**

[REDACTED]  
Fax:

[REDACTED]  
[REDACTED]  
26 October 2021

Please ask for: [REDACTED]

Your Ref: "[Your Ref]"

Our Ref: DWMP Autumn 2021

Dear DWMP Team

**RE: DWMP Consultation**

Thank you for the opportunity to respond to the consultation on the Drainage and Wastewater Management Plan (DWMP). It is understood that this is intended to be the longer-term strategic plan covering drainage, wastewater and environmental water quality and the comments that are provided in this letter are given in this vein. I also understand that a formal consultation will take place next year (June 2022).

Officers from the Council's planning policy and engineering teams attended workshops on 28 and 30<sup>th</sup> September and the 19<sup>th</sup> October, related to the 3 specific drainage catchments or systems within the District. It is hoped that the input made at these is captured along with this informal response letter in the further development of these plans (this letter is a provisional response subject to confirmation after 30 November). The letter addresses the issues in order of the consultation questions subject matter.

It is appreciated that the 14 planning objectives used are based on those set by Water UK, which were then supplemented i.e. Nutrient Neutrality, and it is appreciated that all 3 works within Arun District have been identified through the screening and BRAVA exercises to require improvements. However, the Council does have some concerns over the reasons behind these, as set out in this letter.

Problem characterisations

The most obvious point on this aspect is how little the existing issues are dealt with i.e.

flooding and discharges at outfalls, including lack of urgency/clarity on when these are scheduled to be dealt with. The approach merely identifies the standards that have been set and consequently, the standard that will be applied. This does not explain the reasons or assumptions behind these to give any confidence that the specific issues will be resolved. An obvious example has been the recent discharges at the outfalls, from the Consented Storm Water Overflows in the Littlehampton area and why these were so significant. It is not obvious from the content of the existing workshop documents whether this is temporary and will not continue in the future because there is a lack of capacity/resilience in the system. Repeated internal flooding of basements at properties along South Terrace, Littlehampton occurs but does not seem to have been picked up. With the increase in volume caused by the torrential rain there was a) surcharging manholes (lifting cover(s) of in the road) and b) backing up inside property (flowing out of WCs & shower trays. The issue of impact on bathing water both at Bognor Regis and at Littlehampton is a current issue which was acknowledged in the workshops. The solutions or remedies are difficult because of the range of factors which impact – however, Arun District Council would urge that specific solutions be found in the short and intermediate term.

Groundwater flooding is a significant issue for Arun District not fully explained by its topography, with only 3 small areas of the District not affected by this. Attention should therefore, be given to the relative variance of susceptibility of flooding from this source. For example, this variance is specifically known to be high across a large proportion of the area and significantly impacts the Lidsey area. The information relating to this can be seen within the Arun SFRA Update 2016 Appendix F<sup>1</sup>. Due to this characteristic, it is not fully understood why planning objectives 4 and 7 (in the short term) have not been classed as very significant for all the systems within Arun District. The Lidsey system in particular has had long standing historical problems not just any that may be anticipated in the future. This is particularly relevant when inundation is so prominent in Arun resulting from the impact of the run-off from the chalk spring line (e.g. South Downs) onto the impermeable clay around Lidsey, Barnham, Elmer and other villages. More detailed discussion on the exact issues for this area can be found in the Lidsey SWMP and the associated ones around Elmer can be found in the Elmer SWMP.

Although not a currently a direct issue for any of the systems within Arun, officers are acutely aware of the emergent issues around nutrients and water neutrality that neighbours are facing. While it is encouraging that nutrient neutrality has been recognised and added to the planning objectives, Southern Water are reminded that there are designated sites (e.g. Arun Valley SPA), which partially overlap with the Arun District area which are hydrologically and cumulatively linked to the planning authority area. The Council is therefore, deeply concerned at being the only sub-regional area not to have the ability to demand the required water neutrality standards through planning decisions through default, purely based on the boundaries of the relevant catchment. Arun District Council would therefore, urge that a comprehensive coordinated and cumulative approach be applied to this topic in Arun going forward with policy solutions and recommendations.

#### Option Development and Appraisal

As was raised within the workshops, there is a need to ensure that the modelling and forecasting reflect the latest EA sea level projection, peak river flow and rainfall intensities at the relevant catchment and medium ranges, unless otherwise advised by the Agency.

The Council would wish to see a consistent and coordinated methodology applied across all systems and catchments to the establishment of development headroom within connected

planning authority areas. This should clarify the impacts on and of Dry Water Flow calculations, using a comprehensive database of existing, planned and unplanned developments to establish headroom for discharge consents. It must be emphasised that this must go across local authority boundaries to fully account for the cumulative impacts of development. This is particularly important when focusing on Pagham Harbour where the authority boundaries cut through the middle of it and includes associated issues such as the location of water quality testing or access. To this extent, Arun officers would like to meet with you to discuss setting up a liaison meeting to refresh and update the previous Statement of Common Ground (2017)<sup>2</sup> – as Southern Water have similarly been coordinating with Chichester District Council and the Environment Agency.

Linked to this, the Council wish for more guidance to be produced (e.g. to ensure robust construction of foul drainage connections where the groundwater is high) and strongly enforced to prevent future infiltration, which is a significant issue for a large proportion of Arun District as discussed above. Additional to this, tide locking and high-water levels will mean that certain solutions (e.g. extra storage via SUDs) may not always be appropriate in their present form or standard requiring other solutions or standards to be identified and proposed.

For overall development of options, it is recommended that to address some of the problem characteristics, consideration be given including the role of recommissioning redundant plant/equipment and infrastructure for pumping, treatment or storm storage and short to intermediate term remedies. It seems that there are assets that could potentially be reused in an active way to help towards some solutions.

It is suggested that a full assessment of the risks posed by climate change be taken into account, especially looking at the role and location of existing assets related to sustainable growth and whether larger scale consolidation/augmentation or relocation maybe needed for any assets. This may be especially pertinent to the Manhood peninsula and/or coastal locations once the impact of climate change coastal flooding and any erosion is accounted for.

In particular, it is evident in Arun that a combination of ground water flooding susceptibility and tidal water tables limit the current scope of SUDs to attenuate flooding and surface /ground water infiltration in their current form. The council urges a more holistic and strategic approach be investigated including objectives that decarbonise the WwTW infrastructure in terms of renewable energy and in particular the scope for pumped water storage on a inter-catchment basis looking at the South Downs National Park and coastal plain including river Arun. Manmade water bodies, uphill in the Downs must be feasible option provided that sensitive landscape considerations are accommodated given the urgency of the climate emergency.

Similarly, the Council would wish to see that there is consideration of the scope for larger scale – i.e. catchment or landscape scale – nature based solutions, that may be appropriate for any specific locations in Arun or the connected catchments. If found appropriate through further stages and refinement, then a mechanism for coordinated engagement with all relevant stakeholders (e.g. local authorities and developers or land promoters) should be prioritised and reflected in the investment programme in order to align other documents or plans.

### Investment Programme

It is appreciated that there is not going to be one simple solution required but a combination throughout each, however the Council consider all of the objectives of the DWMP should be considered as a priority for investment within Arun District, as is detailed through the above

points in addition to the existing designation of 'Improve' for each of the systems (Ford, Lidsey and Pagham) falling in the district.

As signalled under comments on the Option Development and Appraisal section above, the Council would wish more work to be done on responses to proposals for connection to the systems, along with guidance and specifically enforcement of high standards for design details to ensure robust construction of foul drainage in areas with high groundwater to prevent future infiltration. This can be achieved in short term through direction towards existing information that is available from West Sussex County Council (WSSC) and the Districts and Boroughs. This could then be addressed more comprehensively through the creation of stand-alone or coordinated documents with WSSC or respective authorities that can be used in determining applications as material considerations until entrained in Supplementary Planning Documents following plan making and testing at examination.

The issue of the high groundwater level and associated high susceptibility to groundwater flooding will be essential during the detailed work on solutions for those systems in Arun District. There should be clear direction provided over the appropriate roles and actions to be taken by each party.

Finally, a clear set of comprehensive documents need to be issued on wider strategic issues that affect the whole region, such as that of nutrient neutrality, particularly nitrates although phosphates and others also apply. The Council do not wish to be left as the only area not being able to apply high standards when all it's neighbours are being required to apply such. This would also be counter to the Council's overall priorities to address the climate emergency declared in January 2020 and the intention to raise standards of new developments wherever possible.

Overall in summary, Arun District feel that:

- there needs to be greater content on the existing issues and how and when these are to be dealt with;
- consistency in the methodology used (climate change allowances and DWF calculations);
- significantly greater enforcement of high design details for the robust construction of foul drainage in areas of high groundwater;
- possible recommissioning of redundant assets;
- identify where natural solutions would be expected to occur and engage with all needed in their development; and
- believe there should be investment in the production of standalone or coordinated guidance documents.

I would be grateful if you could contact me at [REDACTED] or phone 07908919397 in order to coordinate possible meeting dates (for the purposes set out and underlined above under 'Option Development and Appraisal') week beginning 8 November. Yours sincerely

[REDACTED] (Team Leader Planning Policy & Conservation)

**Appendix 2: Planning Policy Committee Item 8 Drainage and Wastewater Management Plan (DWMP) Consultation - further points email 15 December 2021**

From: [REDACTED]

**Sent:** 15 December 2021 17:52

**To:** [REDACTED]

**Cc:** [REDACTED] <[REDACTED]>

**Subject:** FW: Planning Policy Committee Item 8 Drainage and Wastewater Management Plan (DWMP) Consultation - further points

Dear [REDACTED]

Apologies for the delay in forwarding this updated response.

Further to the interim letter response on 26 October, below are Arun member's additional points made at the meeting of Planning Policy Committee (PPC) on 30 November 2021. I have grouped these under the appropriate letter topic headings :-

#### **Problems and Characteristics**

- Southern Water needs to set out via the DWMP how the company can be interventionist and proactive on combatting the impact of blockages in the sewer network and consequent storm related back surges within properties (e.g. in the Pagham and Yapton catchment areas). E.g. consider appropriate penalties/charges to deter inappropriate flushing of wet-wipe and fatty waste products as well as a public information/guidance and campaigns; including Southern Water's operational response to such incidences.

#### **Option development and appraisal**

- Southern Water to clarify in the DWMP action to address East of Arun catchments surface run of capacity – e.g. impact of development within Arun and Worthing e.g. on Ferring rife incidence of storm water discharges
- Southern Water to consider and clarify their role in the DWMP for assisting with nature based water storage (e.g. SUDs, wetlands etc.) solutions – including in terms of design policy standards, operation and offsetting infrastructure planning to serve developments and collaborating with other stakeholders and agencies in delivering 'nature based' water storage solutions e.g. wetland habitats which deliver both biodiversity net gains and carbon sequestration
- Opportunities for water storage needs to be balanced with the need to remove water from the land quickly out to sea because of the high coverage of surface water flood risk across Arun
- In the scoping the feasibility of recommissioning of redundant/disused assets (e.g. for pumping, treatment or storm water storage) to attenuate current and emergent problems - due care be given to ensure that this does not lead to inadvertent issues e.g. resumption of pumped outfalls to sea at Pagham etc. This includes assessing measures to address carbon reduction and renewable energy solutions e.g. pumper water storage etc.

#### **Investment Programme**

- Southern Water's supporting evidence for the DWMP identifies Ford WwTW bottom of the list for capacity/performance and therefore, needs priority investment urgently (given its strategic significance for facilitating planned growth in the adopted Arun local Plan).
- Arun is a key tourist destination with a dependent visitor economy reliant on clean bathing beaches – consequently, there needs to be urgent action to prevent the incidence of licensed and unlicensed combined storm/foul waste water discharge to the sea at outfalls affecting Arun's key bathing facilities with climate change likely to increase storm rainfall

The meeting agreed that comments should only relate clarifying the above points actually raised at the meeting - I would therefore, be grateful for any editing clarifications by Friday 3 December please.

I hope that these are helpful and aid clarification of the provisional response letter.



ID 4053

REF: Cant CC 050922

Canterbury City Council  
Military  
Road  
Canterbury  
CT1 1YW

5 September 2022

FAO [REDACTED]  
Southern Water

BY EMAIL ONLY

Dear [REDACTED],

**Re: Canterbury City Council response to Southern Water DWMP Consultation, focusing on issues in the Stour Catchment**

Thank you for your invitation to provide feedback on the draft Drainage and Wastewater Management Plan. Canterbury City Council welcomes the opportunity to provide input and appreciates the constructive involvement in the workshops on approach, options and participation in the briefings for the DMWP and for the WINEP study.

Although elements of the draft DMWP are encouraging, as below, we have some serious concerns regarding the absence of specific measures to address nutrient pollution in the Stour and the Stodmarsh protected site which we consider **must be addressed within the DWMP**.

Alongside the development of the DWMP, the Water Industry National Environment Programme methodology (WINEP) study on the causes of poor water quality caused by high nutrient levels in the Stour Catchment (and other catchment areas within the Southern Water operational areas) has been ongoing. The task of reducing the nutrient levels in the Stour catchment has been clearly identified and prioritised for action by Natural England. The WINEP study has been completed and clearly identifies Canterbury WWTW as a major nutrient load entering Stodmarsh. There does not appear to be investment priorities listed for the DWMP that will address the nutrient levels in the Stour Catchment within the short timescale and at the scale required: **It is imperative to add short-term investment priorities to tackle the nutrient levels in the Stour Catchment DMWP.**

The DWMP identifies the high priority issue of nutrient enrichment in the Level 1 plan and the expectation that investment will be required to reduce nutrients from Wastewater Treatment Work effluent:

***'Nutrient enrichment.** There are urgent concerns regarding nutrients enriching our coastal and inland waters and affecting the ecology of the natural environment. We are already deploying the best available technologies at many of our larger Wastewater Treatment Works (WWTWs),*

*and expect further investments to be needed in the future to help restore internationally designated Habitat sites to favourable condition where we have identified the need for improvement.'*

It is therefore **highly disappointing** that Southern Water has not prepared for or incorporated actions to address the causes of high nutrient levels within the DWMP. It appears that this is because the risks associated with nutrients were characterised as unknown in the BRAVA assessment and that this has informed the problem characterisation and prioritised options. **The findings of the WINEP study must now be used to update the BRAVA assessment and the current risks in the Stour Catchment accordingly; a recent briefing from the Nutrient Neutrality Working Group indicated that interventions at WWTW will be planned for delivery in AMP8 (2025-30) and these need to be represented in the DWMP.**

**Canterbury City Council expects to see clear investment priorities in the short term in the DMWP that will reduce nutrients in the Stour Catchment.** If Southern Water is able to demonstrate that actions already planned in the DWMP will contribute to quantifiable nutrient reduction in the Stour Catchment during the current and next AMP period, then we invite you to set this out clearly.

Otherwise, the DMWP appears to be well-structured and comprehensive in its approach to long term planning for the improvement of the systems, infrastructure and reducing risk to the environment and property.

Canterbury City Council welcomes the opportunity to review the detailed prioritised investment needs for the Stour Catchment and the prioritisation methodology generally seems sound. **It is good to see the projects to separate and hold storm water to reduce Storm Surge Overflows for Westbere, Canterbury and Swalcliffe included as high priority for action in the short term.** Similarly, the rehabilitation work to the high-risk sewerage and rising mains across the Catchment including Swalecliffe and Chartham are welcomed.

We would like to see the prioritised investment needs planned with more specific target delivery dates in the next iteration of the DMWP.

Yours sincerely,

[Redacted signature]

[Redacted signature]

Canterbury City Council

ID 4054

REF: GosBC 020922



**GOSPORT**  
Borough Council

[REDACTED]  
DWMP Stakeholder  
Engagement Project Manager,  
Southern

Please ask for:

Direct dial:

E-mail:

Water

2<sup>nd</sup> September 2022

By e-mail

Dear [REDACTED]

### **Southern Water's draft Drainage and Wastewater Management Plan**

Thank you for this opportunity to comment on Southern Water's draft Drainage and Wastewater Management Plan.

As you will be aware Gosport Borough Council together with our neighbouring local authorities as part of the Partnership for South Hampshire (PfSH) have expressed our significant concerns on how Southern Water have managed their wastewater activities in the Solent area. This includes the findings outlined in the '*Notice of Ofwat's proposal to impose a penalty on Southern Water Services Limited,*' which highlighted unpermitted and premature spills of wastewater from its treatment works released into our environment and that these spills have been widespread with '*deliberate measures*' taken by the company including former senior management to misreport data about the performance of its wastewater treatment works. This activity has led to convictions and record fines. These actions and subsequent wastewater releases have caused a deterioration in the water quality in the Solent area and has contributed to the nitrates issue which has had a number of implications for development in the Gosport area.

The Council welcomes the draft Drainage and Wastewater Management Plan (DWMP) and the opportunities it provides to improve forward planning for the industry including investment to address some of the issues mentioned above. The Council also acknowledges the scale of the twelve challenges identified in the 'Planning for the Future' section and where applicable the Council will like to work with Southern Water to help find solutions.

Please accept this response on behalf of Gosport Borough Council, and

please contact me or my colleague Owen Devine if you have any queries (or responses) to our comments and suggestions below.

- Page 11 states that the quality of “groundwater drinking water supplies are being gradually degraded by poorly maintained sewers and septic tanks, and from discharges direct to ground in areas that are not connected to our mains sewerage networks.” While these assets may not be Southern Water’s responsibility, are you please able to confirm to us what action is being taken (and by whom) to tackle this serious and ongoing problem?
- Consultants working on behalf of the PfSH authorities are preparing a Strategic Flood Risk Assessment which take into account the latest climate change allowances and modelling for flood risk within the PfSH area working with the Environment Agency and other stakeholders including Southern Water. It would be helpful to include reference to this piece of work in the ‘Working with others’ section on pages 13 – 16.
- We support the 2040 zero pollution incidents target listed on page 27.
- Gosport Borough Council supports the greater use of pollution and rainwater source control, especially through Natural Flood Management approaches, such as wetlands, tree planting and SuDS.
- Pages 50 -54, Main Report SuDS welcome the role SuDS can play in reducing and managing flood risk as well as providing opportunities to deliver biodiversity and amenity benefits. It is helpful for Local Authorities to be able to understand what type of SuDS can be adopted by Southern Water.
- We also support the ambitious ‘Target 100’ and would welcome comments on our emerging local plan on this basis.
- We support the creation of more nutrient resilient WTWs. As the company knows, nutrients caused a significant backlog in development across the South Hampshire area, and although this backlog has been lifted, primarily through land offsetting, we are working towards more sustainable long-term solutions.
- The document states that you want to work with the EA ‘to understand and plan for long-term future permits changes so the next cycle of the DWMP can set out adaptive pathways for future investment in our WTWs, including the relocation of assets or investment in new technology to meet tighter environmental permits.’ Is it not possible to incorporate this within this DWMP?
- We request enhancement to the bathing water quality near Lee-on-the-Solent and Stokes Bay beaches, which are popular recreational and tourism areas and very important to the local economy. We understand this would require increased investment to both Peel Common WTW and Budds Farm WTW, both of which are listed on page 67 as priorities. This article (<https://www.theguardian.com/environment/2022/aug/22/seaside-sewage-monitors-england-environment-agency>) highlighted concern

that swimmers at these locations could be interacting with raw sewage, so request that additional monitoring is also conducted in these locations.

- We note the concern over 'urban creep' and the increasing level of paving within urban areas. As a local planning authority, we try to encourage permeable surfaces and green spaces wherever possible.
- The level of estimated investment needed over the next 25 years is £8.1bn - 19.6bn, which would, respectively, lead to a £160 to £392 increase in customer bills per annum. We welcome Southern Water's concern about rising customer bills, particularly during this period of high inflation and rising living costs. We therefore support cost effective interventions, which nonetheless deliver substantial environmental improvements.
- With regards to estimations of population growth, would Southern Water be able to confirm which data sets they are utilising, and whether it would be updated in light of the new Census?

Thanks again for this opportunity to comment on your draft

DWMP. Yours sincerely

  
Manager of Planning Policy

**ID 4056**

**REF: GravBC 020922**

Via email only to  
[dwmp@southernwater.co.uk](mailto:dwmp@southernwater.co.uk)

**Planning Policy**

**Ask for:** [REDACTED]

**Telephone:** [REDACTED]

**Email:** [REDACTED]

**My ref:** N/A

**Your ref:** N/A

**Date:** 02/09/2022

## Consultation on Southern Water Drainage and Wastewater Management Plan

Thank you for consulting Gravesham Borough Council (GBC) on your draft regional Drainage and Wastewater Management Plan (DWMP).

Whilst you have provided a response form, GBC wishes to make some specific points relating to future development in the area and the provision of the infrastructure necessary to support it.

As your response form does not facilitate this approach, we are submitting our points via this letter and ask that the content is taken into consideration when finalising the DWMP. Please note that this is an officer level response only.

Whilst the DWMP focuses on key investment decisions for the period 2025 - 30 (AMP8) it also looks forward to future actions that might be required to improve performance, capacity and resilience over a longer period to 2050. This document will sit alongside your Water Resources Management Plan (WRMP) covering the same investment period. The Business Plan that supports delivery will be submitted for approval by OFWAT in due course, as part of the 2024 Price Review (PR24).

The overall aim of the DWMP is to put in place a strategic long-term plan that addresses wastewater drainage issues, with interventions prioritised according to risk and managed in such a way as to maintain affordability to the consumer.

The DWMP uses as its starting point a national framework developed by Water UK. This has been refined to have regard to the particular circumstances facing the Southern Water region. GBC officers have participated in previous stages of consultation and stakeholder events, including work on the initial Risk Based Catchment Screening (RBCS) and the development of the Baseline Risk and Vulnerability Assessment (BRAVA).

The DWMP seeks to achieve 14 planning objectives:

- PO1: Reducing the risk of internal sewer flooding
- PO2: Reducing the risk of pollution
- PO3: Addressing the risk of sewer collapse
- PO4: Addressing risk of sewer flooding in a one in 50 year storm

- PO5: Improving storm overflow performance
- PO6: Reduce risk of WTW compliance failure
- PO7: Reduce the risk of flooding due to hydraulic overload
- PO8: Ensure dry weather flow compliance
- PO9: Achieve good ecological status/potential
- PO10: Improve surface water management
- PO11: Secure nutrient neutrality
- PO12: Reduce groundwater pollution
- PO13: Improve bathing waters
- PO14: Improve shellfish waters

Southern Water is seeking to achieve these objectives having regard to the challenges posed by climate change and carbon reduction. The DWMP recognises the need to work collaboratively in identifying optimal solutions based on individual catchments, including the potential to separate out surface water from combined sewers and direct it where possible to sustainable green alternatives. This may also have wider benefits in terms of ecology, biodiversity and the recharge of aquifers. Education will also play a key part in the DWMP, in particular by preventing materials entering the drainage system that may cause blockages or pollute the water environment. This issue is likely to become increasingly important in terms of optimising system performance and reducing micro plastics.

The area covered by Southern Water is very large, covering most of Kent, Sussex and Hampshire and 11 River Basin Catchments. You are responsible for 381 wastewater systems and 367 wastewater treatment works (WTW) within this area. You estimate that you will need to invest some £2.6 billion over the next 25 years to improve 61 of these wastewater systems. However, these represent the largest systems with the greatest number of risks and provide wastewater services to 78% of the area's population.

Gravesham is located within the Medway River catchment, area. However, most of the wastewater arising in Gravesham is treated at the two WTWs at Northfleet and Gravesend. Wastewater from the rural area around Higham flows to the WTW at Whitewall Creek in the Medway Council area. There are also small treatment works at Harvel and Luddesdown run by Southern Water that serve localised catchments. The following information is taken from your strategic context report for the Medway catchment at

<https://www.southernwater.co.uk/media/3860/medway-dwmp-strategic-context.pdf>

Table 1: Sewer Catchments Serving the Gravesham Area

Sewer Catchment Name	Communities Served (Catchments also include communities outside Gravesham where wastewater flows to treatment works)	Population Equivalent Served	Length of Sewers (Km)
Gravesend	Gravesend, Cobham, Meopham, Northfleet, Green, Northfleet, Shorne, Southfleet, Vigo	59,928	417,286
Northfleet	Gravesend, Cobham, Northfleet Green, Northfleet, Sole Street Southfleet, Greenhithe, Hodsall Street, Swanscombe, Istead Rise, Meopham, Longfield, Luddesdown	56,944	430.219

Whitewall Creek	Rochester, Hoo, Lower Upnor, Medway City Estate, Strood, Upnor, Wainscott, Cliffe Woods, Higham, Chattenden, Shorne, High Halstow, Cliffe	35,114	322.019
Harvel	Meopham	55	0
Luddesdown	Luddesdown	103	1.035

The DWMP seeks to take into account population growth resulting from new development planned within the area and the effect of 'urban creep' due to increased areas of hardstanding and associated surface water run-off. However, the population increase you assume appear to be

largely trend based Experian projections and only have regard to adopted Local Plans. This is set out in your Technical Summary: Population Growth and Urban Creep (August 2021) paper at <https://www.southernwater.co.uk/media/5257/technical-summary-growth-and-creep-final.pdf> .

GBC has concerns that the figures you have used may significantly underestimate population increase within the catchments of the WTW serving Gravesham and Medway in particular given the quantum of new housing we are being pressed to deliver under the Government's 'Standard Method'. The figures you have used are set out in the table below.

Table 2: Population increases within catchments used within the DWMP modelling.

Catchment	Pop Eq.2020	Pop Eq.2050	Additional Pop (2020 - 50)	Pop Growth (2020-50)
Gravesend	65,468	76,523	11,054	17%
Northfleet	60,105	71,017	10,912	18%
Whitewall Creek	38,842	47,790	8,948	23%

Appendix B to the document also includes the following information on wastewater systems with limited spare Dry Water Flow (DWF) capacity as follows.

Table 3: Wastewater Systems with Limited DWF Capacity

Catchment	DWF permit (m <sup>3</sup> /d)	Pop. equiv 2020 actual	Forecasted Population Equivalent (PE)		Spare DWF capacity	
			2020	2050	2020 based on actual population	2050
Gravesend	10,886	63,731	65,468	76,523	13%	-2%
Northfleet	9,300	55,440	60,105	71,017	-1%	-24%
Whitewall Creek	5,000	31,173	38,842	47,790	1%	-44%

Given possible discrepancies between emerging Local Plan population increases resulting from the Government's requirements in terms of housing need and the trend based Experian

projections you have used, GBC has concerns regarding investment in new capacity to meet demand in a timely fashion.

Whilst GBC is aware of on-going discussions with the Ebbsfleet Development Corporation regarding improvements at Northfleet, it would welcome an assurance that the DWMP will be sufficiently flexible within AMP8 to deliver required infrastructure investment to meet demands arising from and impacts of new development over and above dealing with existing issues and shorter term climate change impacts.

Whilst GBC is still progressing toward publication of its Regulation 19 Submission Version Local Plan, it would welcome further meetings with you to ensure that both water supply and wastewater issues arising from planned development are addressed in a timely fashion.

In particular, we would wish to ensure that water infrastructure does not act as a constraint on delivery of development or its timing or, if it does, we would want to know what the implications are. Setting aside the issue raised above, Southern Water has identified the most pressing need for improvements in Gravesham based on its assessment criteria is within the Gravesend WTW catchment - see table at <https://www.southernwater.co.uk/media/4254/medway-wastewater-systems.pdf>.

As such, a programme of interventions in the short, medium and long-term are proposed. These timescales are as follows:

- Short Term - before 2030 (AMP8)
- Medium Term - between 2030 and 2040 (AMP9 & 10)
- Long Term - between 2040 and 2050 (AMP11 & 12)

For ease of reference, the plan and tables setting out the proposed interventions and their locations are appended.

As highlighted above, the DWMP raises the issue of urban creep where more paved areas, hard standings and the roofs of house extensions are connected into the foul or combined drainage system and increase the demand on the sewer system during storms. The Council is developing driveway and dropped kerb guidance, and this includes that, in extreme downfalls, pollutants from hardstanding, petrol, oil, and brake dust are transported with the surface water run-off via the roadside drainage directly into the sewage network, our streams and rivers. The aim of our guidance is to address the potential loss of biodiversity and increased flood risk through facilitating good design.

GBC would support measures to educate customers in respect of what should or should not be disposed of through the drainage system. This is likely to be cost effective at £115k for the AMP8 period and would assist in optimising network performance whilst minimising potential for incidents due to sewer blockage. We also wonder whether the plan should be more proactive about grease management for domestic customers by, for example, highlighting that households can install small domestic kitchen biomass grease / fat traps under their kitchen sink.

It is noted that increasing storage capacity at the Gravesend WTW under GRAV.PW02.1 at a cost of £1,650k is scheduled for AMP7 which is before 2025. It is assumed that this is already in hand and we would ask therefore why this appears in this particular DWMP, as it is intended to cover the 5 year period beyond this.

The remainder of the short to medium term measures scheduled for AMP8 are relatively limited. These include:

- **GRAV PW01.2** - enhanced maintenance and jetting of sewers at Darnley Road, High Street WPS and Mark Lane WPS. This is for the period to 2030 but presumably would need to continue unless there was an upgrade?
- **GRAV PW01.4** - targeted CCTV/electroscan surveys and proactive sewer rehabilitation to reduce risk of sewer collapse at Hazells/Windmill Hill to protect groundwater. This is for the AMP8 to AMP10 periods, so through to 2040.
- **GRAV PW02.1** - Increase capacity at Gravesend WTW and review DWF permit to reduce risk of non-compliance. This again is for the AMP8 to AMP10 periods, so through to 2040 and beyond the emerging Gravesham Local Plan period to 2038.
- **GRAV.OT01.1** - identify areas where tidal infiltration may be an issue within the Northern Area (River Front). This is a short term measures within AMP8 to 2030.
- **GRAV.OT01.6** - Catchment wide study based on modelling of improvements, including flow surveys for storm and dry weather flow and model calibration. This is a short term measures within AMP8 to 2030.

All the remaining interventions appear to be long term - i.e. they would only be delivered between 2040 - 50.

Some of these involve diverting surface water from combined sewers to more sustainable options (**GRAV.SC01.1 and GRAV.SC01.2**). The feasibility of such interventions needs to be understood given the limited areas of greenspace etc. to which such water could be diverted - although there could be nature conservation/green infrastructure benefits as part of a design package.

However, retrofitting existing drainage systems so that surface water is diverted to SUDS is likely to be expensive, disruptive and would not be without on-going revenue cost implications that need to be factored in - who would be responsible for maintenance of such features?

At the riverside, how surface water is finally discharged to the River Thames also needs to have regard to increased frequency of tide lock due to sea level rise, depending on the invert level of outfalls.

A number of the longer-term interventions relate to the drainage system serving the town centre, riverfront and the area east of the town centre. There is currently a considerable amount of development being progressed in this area, whilst more is either permitted or likely to come forward through the emerging Local Plan.

As with the points made above regarding population projections, it will be important that the DWMP has regard to these and that consideration is given to whether some of these will need to be brought forward to ensure that new development is supported in a timely fashion.

The final point we would wish to raise as a result of this consultation is the recent joint announcement made by DLUHC and DEFRA referred to in the Chief Planner's letter on nutrient neutrality at

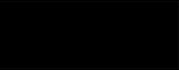
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1093278/Chief\\_Planner\\_Letter\\_with\\_Nutrient\\_Neutrality\\_and\\_HRA\\_Update\\_-\\_July\\_2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1093278/Chief_Planner_Letter_with_Nutrient_Neutrality_and_HRA_Update_-_July_2022.pdf)

Given this implies prioritisation of investment on infrastructure to deal with nutrient neutrality in

areas that are adversely affected and where development is being constrained, will this have implications for the investment programme set out in the DWMP to be submitted to OFWAT for the AMP8 period? If so, will Southern Water re-consult on any changes that need to be made?

Yours Sincerely

  
Assistant Director (Planning)

Phone   
Website [www.gravesham.gov.uk](http://www.gravesham.gov.uk)



Gravesham Borough Council, Civic Centre, Windmill Street, Gravesend, Kent DA12 1AU

ID 4057

REF: HavBC 300822

**Havant**  
BOROUGH COUNCIL

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Via email only

**Enquiries to:**

**Direct line:**

**Email:**

**My reference:**

**Your reference:**

**Date:** 30 August 2022

Dear Sir or Madam

## DRAINAGE AND WASTEWATER MANAGEMENT PLAN CONSULTATION RESPONSE FOR THE EAST HAMPSHIRE CATCHMENT

I am writing on behalf of Havant Borough Council in my capacity as Cabinet Lead for Local Plan, Environment and Water Quality in response to the consultation on the draft Drainage and Wastewater Management Plan (DWMP) for the East Hampshire catchment.

### Budds Farm WWtW

Havant Borough Council recognises the need for the DWMP to provide a long-term investment plan for drainage and wastewater management to ensure the sustainability of drainage infrastructure and systems so that they meet the needs of customers and the environment now and into the future. However, we have concerns that the draft DWMP does not adequately reflect the level of investment needed in the Budds Farm Wastewater Treatment Works (WWtW).

In November 2021 Southern Water announced an £18 million investment<sup>1</sup> to cut pollution incidents by 80%, including a £12 million upgrade to storm tanks, pipework and infrastructure. This followed a visit to Budds Farm WWtW by Alan Mak MP to view its progress towards its upgrade.

The council would have expected to see proposals to upgrade Budds Farm to feature forefront and centre of the draft DWMP but alas it does not. Whilst the reference to optimise or extend the Budds Farm site in the DWMP Investment Needs document is welcomed, this is extremely difficult to find and there is very limited detail on what this would entail.

Furthermore, there is concern that the extension and optimisation of Budds Farm WWtW is only an 'option', and that this project may not be subsequently implemented. As a priority<sup>1</sup> project, it is surprising that it is only identified as a 'medium term' project to be implemented between 2030 and 2040. This is extremely concerning particularly given that Budds Farm is a WWtW with one of the highest level of risks in the south-east.

<https://www.southernwater.co.uk/the-news-room/the-media-centre/2021/november/southern-water-announces-major-investment-at-budds-farm-treatment-works>

Budds Farm WWtW serves nearly 410,000 people living in and around Havant, Portsmouth and the wider area, and has an identified six 'very significant' risks through Southern Water's Baseline Risk and Vulnerability Assessment (BRAVA). Specifically, the wastewater treatment system is identified as being at very significant risk from rainfall related flooding, and storm overflows that discharge during these times. In this respect, it is noted that climate change, growth and urban creep could increase sewer flood volumes by 67% by 2050. As such, there is concern that that the identified "improvements" to Budds Farm WWtW would only at best address the increase in growth, and not the other factors.

Whilst the need to increase storage or separation of surface water as an investment need is welcomed, this only seeks to reduce spill frequency below 20 spills per annum. This is not acceptable – the focus should be on ending the use of Combined Sewage Outfalls (CSO) altogether. Investment should be directed towards upgrades to the sewer system to divert rainwater away from CSOs during times of heavy rainfall.

### Feedback on the consultation

Overall, it is felt that the draft DWMP and supporting documents are unduly technical to understand. An unergonomic process, the way in which the proposals are presented across a series of documents means that the material is convoluted and time consuming to navigate. The documents seem to outline the process to arrive at the draft DWMP, rather than identifying the problems and a clear set of planned improvements with timeframes and costs. As a result, there is a lack of clarity and transparency with regard to what is actually proposed by Southern Water.

For residents in this borough, they are already wary of Southern Water due to the reputational impact of the record £90 million fine that it received for 6,971 unpermitted sewage discharges. Whilst the company says that it has changed, residents in this borough need to be able to clearly identify Southern Water's plans to understand how this may affect service delivery, and ultimately how the DWMP will help to protect the environment especially our rivers, harbours and seas.

Yours faithfully

Cllr [REDACTED]

Cabinet Lead for Local Plan, Environment and Water Quality

ID 3017

REF: HORPAW 050922

9 Riverside  
Codmore Hill  
Pulborough RH20 1FJ  
27/08/2022

Head of Storm Overflow Task Force Southern  
Water  
Yeoman Road Worthing  
BN13 3NX  
FAQ: Dr N  
Mills

RECEIVED  
SOUTHERN WATER SERVICES  
- 5 SEP 2022  
DURRINGTON

Dear Dr Mills,

Drainage and Wastewater Management Plan response

Before responding on the plan in detail I want to make four general comments.

First: I am surprised that Southern Water limited the list of consultees to such a small number (75 Exec summary page 5). This is an important exercise and should warrant a higher profile. Southern Water (SW) did not publicise this exercise until very recently despite starting it Monday 13th June. I find the customer engagement comments on page 15/16 unclear. I am sure with a wider consultation, that a number of members of the public would have engaged, as difficult as it might be.

Second: the issue of water neutrality hardly appears in the report and only reference is on page 25 in "off setting". In view of the importance of this issue at a strategic level I would have expected a higher profile.

Third: SW seemingly is more concerned with high profile issues such as bathing water at the seaside and shellfish areas and not so much about the rivers. In the foreword it is said for inland waters only 14% judged to be in good ecological status by the EA (page 4). The statement in the foreword about bathing waters scoring the highest ever quality ratings is a surprise in the context of 1949 sewage discharges in the 2021 bathing season. Box 1 planning objectives on page 14 makes no mention of rivers, nor of the impact of SSIs or RAMSAR areas.

Four: Based on the information in this document it is rather hard to comment sensibly on or to assess the outcomes of AMP7 and also AMP8. Perhaps the next draft will be clearer on these items with clear measures and results of the former.

The statement on page 11 relating to 24% of WTW already have challenging quality permits... and the use of best available technology on some sites. The statement in the paragraph is unclear what does it mean? Does it mean that SW is only using the best technology at 24% of its WTW sites which raises the question of why not the other sites. Why is SW not seeking to meet the compliance of all the sites inclusive of those that don't have challenging quality requirements? If SW's major objective is to do no harm to the environment this is a peculiar way of doing it. The report states "we have a duty to protect and improve the environment in which we operate and we recognise that causing it no harm through pollution instances the minimum our customers should expect." (the underline is my addition)

Paragraph 5 page 11 " ..... is keeping river lakes reservoirs and coasts healthy and clean". On the face of it this statement seems reasonable. However reading through the report most of the emphasis of the remedial work is linked to coastal waters and shellfish production areas. If you read through the Arun and Western Streams Catchment plan it is clear that there are number of issues on WTWs in the area and spills. To reduce pollution incidents to zero by 2040 raises the question of how challenging is that as an objective? It is clear water flowing from the Arun into the sea suffers from pollution, especially from plants like Horsham new, Ford, Billingshurst, and Petersfield as outlined in the BRAVA papers and others statistical data. So I question the logic of the concentration on coastal waters whilst much less attenuation is being brought to the rivers. It was outlined only 14% reach EA approval. There is a logic challenge there of taking pollution to the seaside and then trying to deal with pollution at the seaside. Therefore I find it difficult to link the catchment area comments and BRAVA data to this strategic cover all study. In the case of the catchment in question there are a number of important SSIs and Ramsar.

A risk based approach to deal with spill related pollution would seem sensible. What is unclear in the document is how the decision was made to allocate the WTW sites to either Band Zero - One - Two. What was the criterion used? I find it difficult to understand how the Arun valley sites and Western Rother sites would have been classified. This is because there are number of SSIs and a RAMSAR site in that catchment area presumably making the risks allocation much more sensitive. This doesn't seem to be the case as these are in Band 0 hence my comments on rivers (see above).

In Box 2 page 17 there is a bullet point on 517 million to improve the standard of bathing waters and 537 kilometres of rivers. There is no detail about the work being undertaken on rivers. It would be useful to know what work is being undertaken under AMP7 and whether these are on track to be finished before being able to comment on objectives for AMPS.

Storm overflows: these are endemic and have been around a long time and of course today attract a lot of press publicity and public attention. This is not you. Storm overflows provided SW ensures discharges from wastewater systems do no harm to the environment. The report talks about a dilution ratio of eight. This is justified is being similar to water released as treated effluent. The other issue is the frequency of discharging. Emphasis is placed on the fact that not allowing storm overflows would result in flooding and sewage back up into premises. If capital expenditure was no issue all the company would need to do is to increase storage capacity. A comment on storage is made on page 37 para 2. Bingo

What is not clear from the document is the pollution caused by run off from hard surfaces such as roads car parks etc. Whilst water from rooftops and gardens etc is cleaner in theory run off from hot surfaces can be heavily polluted. Any measures put into place such as filtration systems or sump tanks would be welcome.

Sewers: Clearly in modern developments where rainwater is not harvested or partly harvested then

planning authorities need to help reduce sudden water rushes by ensuring that surface water/ rainwater is kept separate from sewers: Restrospective remedial work is much more difficult and tricky. We often see sewers in Pulborough overflowing due to the high load of rainwater plus sewage in the pipes. This is despite the fact that SW claim they are separate systems locally but in reality surface water is getting into sewers. It would be worth SW exploring with planning authorities access to S 106 monies in order to retrofit or re-equip some of the local areas with a better segregation of sewer and rainwater.

SW does cooperate with planning authorities applying regulations etc and provides advice. This should incorporate the highest standards of SUDs and other ways to improve the handling of rainwater and runoff, outlined in pages 52-53. This is outlined but needs more emphasis in the report.

Why on page 55 does SW seek to develop it's own system for the valuation of ecosystem services to be used across its plans. These systems already exist why does SW feel the need to reinvent the wheel?

PO11: nutrient neutrality is outlined from page 57. It is disappointing but in this consultation SW only considers neutrality and not in fact improving the situation by looking to reduced nutrient impacts on the water system. Nutrient neutrality is a stay in business condition but if there is already harm there surely SW should be looking to reduce the levels not just maintain them in the status quo ante. In fact this part of the report especially comments on page 58 help underline my earlier comments about improvements at WTW plants on the Western Rother and on the Arun in relationship to the SSIs and RAM SAR sites locally. The good ecological potential and ecological status PO 9 is an important objective. One could comment that it is disappointing that it is number 9 in the hierarchy not higher up the list of priorities.

One thing missing from this report though it may be the plan to incorporate it in the final draft report is no mention of monitoring or measuring SW against the targets and objectives of set out here. It is necessary that this monitoring/ measuring be outlined and consulted upon with the public at some stage. This is due to the public's lack of confidence in SW management and its handling of its assets and our water systems. SW should undertake regular reports on progress against plan providing it not only to the regulator and the EA but also to local councils in SW operating areas.

These should be Open Access documentation

Yours sincerely

PR Clarke

Horsham District Councillor for Pulborough Amberley and Coldwaltham.

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CT: Cllrs Jonathan Chowen – Leader, Lynn Lambert – Cabinet Member Barbara

Charles - Director of Place HOC

Catherine Howe – Senior Planner

**ID 4055**

**REF: NE 020922**

Date: 02 September 2011  
Our ref: DAS/ UDS A003457, case ref 399644  
Your ref: SW DWMP Jul 2022



NATURAL  
ENGLAND

**BY EMAIL ONLY**

Customer  
Services  
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Dear [REDACTED]

Discretionary Advice Service (Charged Advice)

**Development proposal and location:** Southern Water Drainage and Wastewater Management Plan (DWMP) consultation 2022

Thank you for your consultation on the above dated 13 June 2022, which was received on 29 June 2022.

This advice is being provided as part of Natural England's Discretionary Advice Service. Southern Water have asked Natural England to provide advice upon:

- Drainage and Wastewater Management Plan public consultation

This advice is provided in accordance with the Quotation and Agreement UDS A003457. The

following advice is based upon the information within:

- Draft regional DWMP
- SEA Draft Environmental Report & Appendices
- SEA Scoping Report & Appendices
- Level 2 DWMPs (including strategic context, working with others, risk-based catchment screening, BRAVA, problem characterisation, options development and appraisal, programme appraisal)

We have considered the draft plan against the full range of Natural England's interests in the natural environment. Our response is attached in Annex 1 and 3 and a summary is given below for ease of reference. Policy and legislative context relevant to the advice is set out in Annex 2 to this letter. We have added the completed response form provided by Southern Water in Annex 4.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. More information on our role in advice to the water sector can be found in Annex 5 to this letter.

#### SUMMARY OF NATURAL ENGLAND'S ADVICE

- The dDWMP has been partially considered under the Conservation of Habitats and Species 2017 Regulations as amended, known as a Habitats Regulations Assessment (HRA).
- The dDWMP has only carried out an HRA screening. The screening does not identify all the Habitats sites within the zones of influence and the full HRA has not yet been completed so we cannot fully determine the likelihood of significant effects on Habitats sites. No appropriate assessments have been completed therefore not all adverse effects have necessarily been identified and/or mitigated to be sufficiently certain to remove adverse effects on integrity. Due to this, it is also uncertain whether the tests of no alternatives and imperative reasons for identified adverse effects on integrity are required, and whether any compensatory habitat for identified adverse effects on integrity should be secured. These deficiencies in the HRA must be rectified before the final plan is published.
- The dDWMP has been partially considered under the UK legislation by The Environmental Assessment of Plans and Programmes Regulations 2004 SI No.1633 (Strategic Environmental Assessment (SEA) process). The SEA has been completed including the scoping stage which NE were consulted on, however it is not complete.
- The dDWMP has mostly appropriately prioritised wastewater catchments which pose threats to the environment. Please see comments in Annex 3 regarding the BRAVA process in terms of prioritisation of wastewater catchments and in particular the application of the nutrient neutrality objective.
- The dDWMP has on most occasions appropriately selected options for wastewater catchments which are less damaging to the environment. We would advise further use of nature-based solutions to address the issues identified, and more detailed consideration of impacts to the environment in the proposed solutions to the issues identified. Please see Annex 3 for further comments on options appraisal.
- The dDWMP SEA contains options that potentially affect designated sites, Marine Protected Areas, protected landscapes and/or habitats of principal importance for the conservation of biodiversity. These potential impacts on important environmental receptors have been adequately assessed. However, these impacts on important environmental receptors have not been adequately mitigated. The details are set out in Annex 1.
- The dDWMP has not yet been assessed for the potential of net gain in biodiversity. At this stage it is not possible to comment on the likelihood of the dDWMP resulting in a net gain in biodiversity as the Biodiversity Net Gain Assessment has not yet been completed.
- The natural and social capital of the dDWMP options has been partially assessed. At this stage of the dDWMP it is difficult to comment on the likelihood of investments resulting in enhanced natural capital.
- The identified deficiencies in the SEA content and process should be addressed before the final plan is published.

If you have any queries relating to the advice in this letter, please contact [REDACTED] on [REDACTED]

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the

competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Yours

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## Annex 1

### Natural England's Advice on Southern Water's Draft Drainage and Wastewater Management Plan 2022

The legislative and policy context for Natural England's advice is set out in Annex 2 to this letter.

#### 1 Habitats Regulations Assessment (HRA)

The plan has partially complied with the policy and legislation set out in Annex 2 due to the reasons provided below.

At this stage an indicative Habitats Regulation Assessment has been provided in the SEA appendix F, with the full HRA still in progress.

Habitats sites screened in:

- General comments
  - A clearly defined methodology of how designated sites have been screened in/out should be included. Table 4.4 is useful to identify how many designated sites are identified as linked to each wastewater treatment works, however it is not clear which sites are included in these numbers as, for most of the wastewater catchments, only those described as intersecting are listed in Tables A1 & A2 (further comments on specific catchments below). The screening methodology should for example, identify how sites have been screened in for all catchments including the methods of which sites are 'intersecting' and which sites are 'solely hydrologically linked' and the area/ distance use in relation to the zone of influence.
  - There are significant errors in the methodology for screening designated sites in, for

example, the only WwTW listed as interconnecting with Stodmarsh Ramsar site is Pennington (New Forest catchment) – this does not seem correct as is very far away. It is advised that the screening assessment is checked across all catchments to ensure there are no other errors of this nature.

- Proposed European sites should also be included, these include pSPA, pSAC and pRamsar sites.
- Below are some examples of where NE have reviewed designated sites screened into wastewater catchments. It is advised that this advice is followed for all catchments where appropriate, we have not had capacity to review them all to this level of detail.
- Stour Catchment
  - Swalecliff WwTW
    - Agree with the designated sites included as intersecting with the wastewater catchment.
    - Only the designated sites intersecting with wastewater catchments are included. Those listed as being solely hydrologically in table 4.4 (appendix F) are not named so it is unclear what methods have been used to identify these – not included in table A2. It would be advisable to add these to table A2 or if they have already been mentioned in table A1 clarify which of the sites are relevant for this WwTW (and include distance in relation to zone of influence).
  - May Street Herne Bay WwTW
    - Only 3 designated sites are listed as linked to this WwTW in tables A1 & A2. Additional designated sites are included in table 4.4 but it is unclear which additional sites have been identified as being linked to this WwTW. Additional designated sites that should potentially be listed as intersecting (depending on methods used as per comments above) are Thanet Coast SAC, Thanet Coast Marine Conservation Zone (MCZ) (listed in table A1 for other wastewater systems but not included for May Street Herne Bay), Margate & Longsands SAC, Blean Complex SAC (upstream but may be impacted), Stodmarsh SAC, SPA, Ramsar (upstream but may be impacted).
  - Westbere WwTW
    - No designated sites are listed as intersecting. This WwTW is located adjacent to Stodmarsh SPA, Ramsar, SAC. It would seem these sites are linked and should be included. Justification (with evidence) should be provided if there is a reason these sites have not been screened in and clarity around how this has been assessed (as per the screening methodology issue raised in comments above).
    - No inclusion of this WwTW in table A1 or A2, it is therefore uncertain which designated sites have been included.
    - Designated sites that should be included intersecting or hydrologically linked: Stodmarsh SPA, SAC, Ramsar, Thanet Coast SAC & MCZ, Thanet Coast & Sandwich Bay SPA & Ramsar, Outer Thames Estuary SPA, Margate & Long Sands SAC.
- Arun & Western Streams Catchment
  - Summer Lane Pagham WwTW
    - Same comments as above apply; designated sites screened in as solely hydrologically linked in table 4.4 are not listed in tables A1 or A2.
    - Solent & Dorset Coast SPA and Pagham Harbour MCZ should be included as intersecting designated sites.
  - Thornham WwTW
    - Solent & Dorset Coast SPA should also be included as intersecting designated site.
    - Not all designated sites listed as linked in relation to bat species have been

included in table A2.

- Cuckmere & Pevensey Catchment
  - Hailsham North WwTW
    - Only one Habitats site has been screened in as intersecting – it does not specify in table A1 which site this is. Pevensey Levels Ramsar & SAC should be included as intersecting.
    - Same comments as above apply; designated sites screened in as solely hydrologically linked are not listed in tables A1 or A2.
  - Hailsham South WwTW

Hailsham South is included in table A1 for both Pevensey Levels Ramsar and SAC but not in table 4.4 (only mentions one intersecting Ramsar site) –

- should be included in this table as intersecting site.
- Zone of influence for both Hailsham North and South WwTWs is likely to be the same, so the same Habitats sites should be screened in for both.

In regard to interest features of Habitats sites, not all interest features have been identified correctly, some examples are provided here:

- Beachy Head West MCZ – Ross worm reefs and peat clay exposures are not interest features of this site and have been incorrectly included; infralittoral muddy sand, infralittoral rock and thin sandy sediment and infralittoral sandy mud are missing from the list of interest features.
- Dover to Deal MCZ – missing the following designated features: native oyster (*Ostrea edulis*), and subtidal chalk.
- The Needles MCZ – missing the following designated features: high energy infralittoral rock, moderate energy circalittoral rock, and moderate energy infralittoral rock.
- Pevensey Levels SAC – wetland invertebrate assemblage and wetland plant assemblage are listed incorrectly. The designated feature is S4056 Little ram's-horn whirlpool snail, *Anisus vorticulus*.

There is no mention of whether designated sites are failing their conservation objectives and/or current condition status or uncertainty around this – this should be included and considered in the assessment as it is important to understand resilience, for assessing likely significant effect and whether mitigation is sufficient or appropriate.

In regard to mitigation measures, it is positive that there are in depth descriptions of the specific mitigation measures to be followed for the various pressures identified. It is noted that the full HRA and wider environmental assessment has not yet been completed (e.g. for SSSIs, MCZs), this section should be updated (or refer to the relevant sections) to include the specific mitigation required in relation to designated sites.

Appropriate assessments have not yet been completed – this is a requirement for all plan options unless, on the basis of objective information, a likely significant effect can be excluded by the screening of relevant Habitats sites (activities listed in table 6.3).

- Unable to provide comments on whether adverse effects on integrity have been avoided or mitigated as the appropriate assessments have not yet been carried out.
  - The appropriate assessment must identify all relevant adverse effects on integrity and uncertainties.
  - All mitigation aimed at addressing likely significant effects or/and removing adverse effects must be covered within the appropriate assessment.
  - Any options with residual adverse effects identified or where adverse effects are uncertain must have assessments under Regulation 64 (to determine that there are no alternatives with less or no adverse effects and demonstrate Imperative Reasons of Overriding Public Interest).

- All options with adverse effects that cannot be excluded must have secured compensatory habitat such that the coherence of the Habitats sites series is maintained.
- The HRA of the plan should include an assessment of the in combination and cumulative impacts of the plan with other plans and projects – this has not yet been completed, NE seek clarity on when this will be undertaken.
- The review of pressures on designated sites (section 6.3) is useful to identify where activities might have LSE's. Those that are listed as amber would in NE view require appropriate assessment.
- It is not clear how the HRA has influenced the plan's options' selection (the full unconstrained list is not included and there is no detailed methodology or evidence showing how the feasible options lists was decided).

## 2 Strategic Environmental Assessment (SEA)

The plan has failed to fully comply with the policy and legislation as set out in Annex 2 due to the comments provided below.

- The consultation process with statutory bodies has been appropriate, with NE being consulted at relevant stages. The outcomes of previous responses and how these have been incorporated into the DWMP reports have been considered.
- There is a large degree of uncertainty of how the options/ investment needs will impact on the environment as the specific locations of the investment options have not been finalised yet. It is understood that once specific options and locations for DWMP interventions are known, additional datasets will be collated to inform the assessment process. We support this.
- It is not clear how the SEA has influenced the plan options' selection (the full unconstrained list is not included and there is no detailed methodology or evidence showing how the feasible options lists was decided).
- Assessment of cumulative effects – this has not yet been carried out. The plans that will need to be considered to identify these effects seem appropriate but does seem to be missing some crucial plans/programs such as the WINEP, EA Shoreline Management Plans and other water company drought plans.
- Potential impacts for all pathway measures (section 4.2.3):
  - Agree that the majority of impacts come from the construction phase of the option, and that during operation the effects are likely to benefit the environment/ communities and increase resilience of the wastewater systems.
- Level 2/3 impacts (section 4.3):
  - High value environmental receptors have been identified in the impacts listed for each of the catchments area options, however there is a lack of consideration of other designations such as MCZs and Sites of Special Scientific Interest (SSSIs).
  - It is positive to see that the list of impacts for each catchment is specific to the areas, however this does not go into detail on some of the potential impacts to high value environmental receptors (e.g., loss of habitat, spread of invasive species, disturbance to designated features/ priority species).
- Mitigation and monitoring (section 5):
  - Table 10 outlines some of the general mitigation measures that will be considered. The measures to control impacts to biodiversity, flora and fauna are thorough, however could include further detail on the best practice methods such as measures to reduce noise/ physical disturbance to species, reduce spread of INNS and pollution prevention (INNS risk assessment section 6.2.3 could be included in the table).
  - It is positive to see consideration of requirements to deliver Biodiversity Net Gain in the design process.
  - The section on monitoring is not detailed enough/ unfinished. A timetabled plan to

address any of the evidence gaps will need to be included in this section.

- Agree that when this is completed this should focus on mitigation measures where significant environmental effects have been identified from the SEA and HRA – this will be required and must be sufficient to avoid any significant effects in order for the SEA and HRA to be compliant.
- The outcomes of the SEA and HRA are consistent, but both require significant further development and assessment.
- SEA Scoping report:
  - The scoping report includes a good cover of other plans and projects that will be assessed in combination with the dDWMP. However, there is no mention of the WINEP programme which should be considered as well.
  - As well as identifying in-combination effects and cumulative impacts, opportunities to achieve wider gains and synergise in terms of environmental improvement/enhancement, such as options put forward via WRSE, should be aligned and identified in the dDWMP.

### 2.1.1 Protected landscapes in the SEA

The plan has failed to fully comply with the policy and legislation as set out in Annex 2 due to the points raised below.

- Protected and recreational landscapes have been well considered in the SEA, which is an SEA objective in the dDWMP.
- Protected landscapes:
  - Arun & Western Streams – there is no mention of the Surrey Hills AONB.
  - North Kent – there is no mention of the Kent Downs AONB.
  - The catchment area summaries in the SEA do not include all protected landscapes for some of the catchments (though these are listed in the strategic contexts for the catchments not listed above).
- Impacts on protected and recreational landscapes have been carefully considered and mitigated appropriately. Further detail could be added in the general mitigation measures for protected landscapes; however, we understand this may come later in the process when specific locations and more information is available on the investment options.

### 2.1.2 SSSIs in the SEA

The plan has failed to comply with the policy and legislation as set out in Annex 2 due to the reasons stated below.

- An assessment of impacts on SSSIs has not been conducted.
- SSSIs have been included in the baseline information within the scoping report but it is not clear how these have been assessed within the plan.
- All SSSIs that are potentially impacted by the plan will need to be identified and screened for likely impacts. There should also be information of the designated features and condition of these SSSIs included in the SEA, as well as any relevant threats and adverse condition reasons listed for the sites such as those related to water quality and water quantity/resources (and/or any that are linked to land use/drainage issues).
- Once impacts to SSSIs are identified, sections on mitigation and monitoring will need to be updated accordingly within the SEA (and linked, made reference to any other subsequent environmental assessment sections within the plan documentation such as the HRA).
- Effects to SSSIs have been considered in the proposed SEA framework, this should be applied to the SEA assessment.

### 2.1.3 Biodiversity in the SEA

The plan has failed to comply with the policy and legislation as set out in Annex 2, please see comments below for this justification.

- Impacts on priority habitats and species have not been assessed. All relevant priority habitats and species that could be impacted by the catchment options and subsequently any potential impacts affecting them should be identified. Monitoring and mitigation will also need to be considered/included.
- There is limited regard to restoration of priority habitats and species, this should be considered as well as the focus on protecting and enhancing existing priority habitats and species.
- Effects to priority habitats and species have been considered in the proposed SEA framework. The assessment questions covered within the proposed SEA framework (table 6, SEA scoping report) for priority habitats and species are well considered. This should be applied to the SEA assessment.

### 1.2.4. Climate change in the SEA

The plan has partially complied with the policy and legislation as set out in Annex 2 due to the reasons set out below.

- The technical summary on climate change provides a useful overview of how climate change has been considered. It provides a clear outline of how climate change has been factored into the BRAVA methodology.
- It is unclear how adaptation and resilience of wildlife (in particular water dependent protected habitats and species) has been considered, such as the need to enable wildlife to adapt and move upstream or inland from the coast.<sup>1</sup>
- Climatic factors have been well considered in the high-level assessment of impacts within the level 2 plans.
- The risk assessments for 2020 and 2050 are useful in identifying where investment needs may change and require adaptive planning with regard to the effects of climate change (and predicted growth).
- The monitoring is incomplete at this stage within the SEA, we would expect to see how climate change will be monitored and consideration to this in the mitigation in later versions of the draft DWMP.

### 1.2.5 Protected species

Please see Annex 2 with regard to Natural England's advice on protected species. The plan in the proposed SEA framework clearly identifies where potential risks to protected species will be assessed, with specific questions to evaluate these. We understand that this aspect will be done in later stages of the SEA when options are identified and when further details on locations/ potential impacts of these are known. The SEA will not be compliant without this assessment.

### 1.2.6 Marine Conservation Zones (MCZs) in the SEA

The plan has failed to comply with the policy and legislation as set out in Annex 2, as per the detail set out below.

- Impacts on MCZs have not been assessed. All MCZs that are potentially impacted by the plan will need to be identified and screened for likely impacts. There should also be information of the features of these MCZs included in the SEA. Monitoring and mitigation will also need to be included where necessary.
- The least hinders assessment will need to be carried out using the conservation advice and conservation objectives for the relevant MCZs. This should include Natural England's advice

on seasonality, for instance regarding breeding birds and migratory fish species.

- The assessment of impacts to MCZs has been considered in the proposed SEA framework but lacks some specificity. For example, impacts could be changes to inputs to estuaries and transitional habitats and other coastal priority habitats such as saltmarsh. This should then be applied to the SEA assessment.

## 2.2 Water Framework Directive Assessment

Comments on WFD are a matter for the Environment Agency however Natural England notes that interventions to improve water quality by reducing pollution and spills to the environment or to improve wastewater treatment will go towards good ecological status. This will be beneficial to designated sites and environmental receptors.

1 Natural England's climate change risk assessment and adaptation plan [Natural England's climate change risk assessment and adaptation plan \(2021\) - NE761](#)

Natural England's Climate Change Adaptation Manual [Climate Change Adaptation Manual - NE751 \(naturalengland.org.uk\)](#)

### Annex 2

#### **Policy and Legislative Context to Natural England's Advice on Southern Water's Drainage and Wastewater Management Plan 2022**

At present, the completion of a DWMP is not a legal requirement for UK Water Companies as part of PR24. However, due to DWMPs supporting plans during the 2024 Price Review, as well as providing the opportunity to influence prioritisation of improvements to wastewater assets of environmental concern, Natural England have engaged throughout the process where possible, and view these plans as a positive step towards securing better environmental outcomes.

Where Natural England have given non-statutory advice, and accordingly charged using the Discretionary Advice Service (DAS), it is recommended that this is considered within the current DWMP and future statutory DWMPs.

## 2 Habitats Regulations Assessment and Duties to Habitats Sites

Regulation 9 of the Conservation of Habitats and Species Regulations 2017 (S.I. 2017/1012) as amended (referred to as the Habitats Regulations) requires every competent authority, in the exercise of any of its functions, to have regard to the requirements of the Habitats Directive. This requirement includes restoring favourable conservation status. Regulation 10 places a duty on a competent authority, in exercising any function, to use all reasonable endeavours to avoid any pollution or deterioration of habitats of wild birds. In addition, regulation 63 places obligations on competent authorities in respect of plans or projects likely to have a significant effect on a protected site. The [Government guidance](#) now refers to sites covered by the provisions of the Habitats Regulations as 'Habitats sites' in line with the wording in the National Planning Policy Framework and we have followed that nomenclature throughout this letter. Note that for Marine Protected Areas that are also Habitats sites and Ramsar sites the legal tests are the same as terrestrial/freshwater Habitats sites. In England, as a matter of policy, sites listed or proposed under the "*Ramsar Convention on Wetlands of International Importance*" receive the same level of protection as Habitats sites.

Water Companies are encouraged to prepare Drainage and Wastewater Management plans and so they are the Competent Authority for Habitats Regulations Assessment (HRA) of the dDWMP. The HRA should be clearly distinguishable document or section of the DWMP. The HRA should include:

- A list and/or map of all relevant Habitats sites.
- An appropriate assessment of the plan options unless, on the basis of objective information, a likely significant effect can be excluded by the screening of relevant Habitats sites.
- The appropriate assessment must identify all relevant adverse effects on integrity and uncertainties.
- All mitigation aimed at addressing likely significant effects or/and removing adverse effects must be covered within the appropriate assessment.
- Any options with residual adverse effects identified or where adverse effects are uncertain must have assessments under Regulation 64 (to determine that there are no alternatives with less or no adverse effects and demonstrate Imperative Reasons of Overriding Public Interest).
- All options with adverse effects must have secured compensatory habitat such that the coherence of the Habitats sites series is maintained.
- The HRA of the plan should include an assessment of the in combination and cumulative impacts of the plan with other plans and projects. The HRA should have regards to relevant caselaw and should take account of whether the site is meeting its conservation objectives for relevant features and attributes to the plan options.

## 2.1 Strategic Environmental Assessment (SEA)

The European Commission Directive 2001/42/EC “*on the assessment of the effects of certain plans and programmes on the environment*” is known as the ‘SEA Directive’. It requires “*an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment*” (EC, 2001; Article 1).

### 2.1.1 Wildlife and Countryside Act 1981 as Amended

Section 28G of the Wildlife and Countryside Act 1981, as inserted by section 75 of and Schedule 9 to the Countryside and Rights of Way Act 2000, places a duty on public authorities, including water companies, to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of SSSIs. These duties are mirrored in the general recreational and environmental duties placed on relevant undertakers in the Water Industry Act (1991) as amended. These duties not only apply to companies to remove their impacts but also to contribute to maintaining or achieving SSSI favourable condition.

The rate of improvement going forwards is set out in the Defra 25 Year Environment Plan which aims to restore “*75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term*”.

### 2.1.2 Natural Environment and Rural Communities Act and Net Gain

Under Section 40 of the Natural Environment and Rural Communities Act 2006, every public authority, including water companies, must in the exercise of its functions have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity in this context includes restoring or enhancing a population or habitat. Section 41 of the same act requires a list of habitats and species that are of principal importance for the purpose of conserving biodiversity (to which Section 40 duty applies) to be published. This list is referred to as Section 41 or priority habitats and species list.

The Defra 25 Year Environment Plan states “*We will achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife this includes[...] creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits.*”

In addition, there are requirements for net gain in biodiversity in national planning policies.

### 2.1.3 Protected landscapes

Relevant Authorities (including water companies as a Statutory Undertaker) are to have regard to the purposes of National Parks (Section 11A (2) of the 1949 Act) and the similar duties towards Areas of Outstanding Natural Beauty (AONBs) (Section 85 of the Countryside and Rights of Way Act 2000) and the Broads (Section 17A of the Norfolk and Suffolk Broads Act 1988). Duties to further the natural beauty and rural amenity are also included within the general recreational and environmental duties placed on relevant undertakers in the Water Industry Act (1991) (as amended).

Protected landscapes are central to the delivery of aspirations in the Defra 25 Year Environment Plan to enhance the beauty, heritage and engagement with the natural environment. In addition, there are requirements to consider protected landscapes in national planning policies.

### 2.1.4 Climate change

The Climate Change Act 2008 sets the legal framework for adaptation policy in the UK, preparing for the likely impacts of climate change. The 2nd Climate Change Risk Assessment (2017) identifies risks to water supply and natural capital, including coastal communities, marine and freshwater ecosystems and biodiversity, as among the highest future risks for the UK relevant to the water industry. The Defra 25 Year Environment Plan aspires to “*take all possible action to mitigate climate change, while adapting to reduce its impact*”.

In addition, there are requirements for considering impacts of climate change and ability for the environment to adapt in national planning policies.

### 2.1.5 Protected species

[Natural England Standing Advice for Protected Species](#) is available on our website to help local planning authorities and others including water companies better understand the impact of their operations and development on protected or priority species should they be identified as an issue at particular developments or plans. This also sets out when, following receipt of survey information, the authority (or the undertaker in regards of the exercise of permitted development rights) should undertake further consultation with Natural England.

### 2.1.6 Marine Conservation Zones

Section 125 of the Marine and Coastal Access Act (MCAA) (2009) applies a general duty to public authorities to exercise their functions in a way that best furthers the conservation objectives of a Marine Conservation Zone (MCZ) or, where that is not possible, least hinders them. There is also an obligation to notify Natural England where a public authority’s function might significantly hinder the MCZ’s conservation objectives or significantly affect an MCZ. The relevant public authorities must take account of this duty in the assessment of the water company statutory plans.

The Defra 25 Year Environment Plan states “*We will achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife this includes[...]*

- *Reversing the loss of marine biodiversity and, where practicable, restoring it, [...]*
- *Increasing the proportion of protected and well-managed seas, and better managing existing protected sites.”*

## 2.2 Water Framework Directive

The Water Framework Directive<sup>2</sup> sets specific objectives for the protection of the water environment which include for surface water bodies the prevention of deterioration and achievement of good ecological status/potential. For groundwater bodies the objectives are to prevent deterioration and achieve good chemical and quantitative status.

The Defra 25 Year Environment Plan has ambitions to achieve a clean and plentiful water supply including “*improving at least three quarters of our waters to be close to their natural state as soon as is practicable by:*

- *Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies.*
- *Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans.”*

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<sup>2</sup> [Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy](#) is referred to as the Water Framework Directive or WFD and is enacted into law by The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003

### **Annex 3**

## **Natural England’s Advice on Southern Water’s DWMP Level 2 and 3 plans**

### **4.1 General comments**

The strategic context WwTW location maps are very useful however the quality is quite low, and it is difficult to see clearly where they are located at finer scale. This also has resulted in uncertainty in reviewing the screening of designated sites, for example it was difficult to understand connectivity.

### **4.2 Planning Objectives**

It is unclear how SSSIs and MCZs are considered. These are not referred to in the national guidance and this omission does not appear to have been rectified in Southern Water’s assessments of planning objectives except in so far as where they overlap with Habitats sites. We understand that the risk to SSSIs and MCZs has been considered in WwTW performance and storm overflow performance, however it is not clear if impacts to these sites have been fully considered as part of these planning objectives. We maintain our recommendation that a new planning objective is added linking the risk of assets contributing to existing failures of, and/or preventing recovery towards, 25 YEP targets for designated sites, biodiversity and protected landscapes.

#### **4.2.1 Nutrient Neutrality**

The BRAVA methodology for securing nutrient neutrality is useful in providing the information behind this planning objective. It is positive to see a map of the Habitats sites included. Please note that Nutrient Neutrality does not specifically apply to the Solent and Dorset Coast SPA at the current time. This only applies to the Solent Maritime SAC and Solent and Southampton Water SPA. This should not significantly affect the results as most of the WwTW in the Solent are covered within Nutrient Neutrality for those sites.

Appendix B – this is a useful table in pointing out where there are water quality impacts or risks. In the table it says ‘Nitrogen (usually TP)’ – this should be TN.

### **4.3 Options Appraisal**

It is positive to see that investigations into nutrient budgets has been picked up in many of the

options, however we would advise this to be considered wider in any catchments where there are water dependent designated sites (and/or priority habitats, species), as a minimum where they are identified within the environmental assessment as being at risk of impact. This will be significantly important where the nutrient neutrality planning objective is flagged as moderately or very significant. We would recommend Southern Water contributes towards and undertakes these investigations collaboratively and at a catchment scale, sharing knowledge and information from projects already completed or emerging within catchments (e.g., Diffuse Water Pollution Plans).

We recommend and strongly encourage wider use of nature-based solutions in the options list, especially around holding water back in terms of drainage and flood resilience, and carbon storage (e.g., natural flood management and wetland creation). We understand that Southern Water are limited in what can be achieved but where possible we encourage partnership working to achieve greater outcomes and that you advocate/ support the priority of using more nature-based solutions as methods to make improvements as they have many additional benefits.

We could not find a full unconstrained lists of options or justification as to how and why different options were rejected or put forward and whether any estimated cost analysis was factored into these decisions. It is not clear what stage this aspect is currently at.

Options appraisals should have regard to the existing extensive work in various catchments and look to add value, working strategically with other plans/projects to strive towards achieving greater improvements and enhancement.

#### 4.4 Level 2 Catchment Specific Comments

##### 4.4.1 Adur and Ouse

###### Nutrient Neutrality

Table 1: Specific comments based on PO11 (nutrient neutrality). Comments from Natural England's previous response which have not been addressed.

Wastewater catchment	PO11 – Nutrient Neutrality	Discharges/ flows into designated site	NE comments
Ashington	Very significant	No	Unclear why very significant for NN as no clear connection to Habitats sites – please confirm why very significant.

##### 4.4.2 Arun and Western Streams

###### Nutrient Neutrality

In the BRAVA analysis for the catchment, nutrient neutrality is flagged as either moderately or very significant for most of the wastewater systems. WwTW that are of particular concern for this area, including Thornham, Bosham and Chichester, are all flagged as priority red for improvement which is positive.

Table 2: Specific comments based on PO11 (nutrient neutrality). Comments from Natural England's previous response which have not been addressed.

Wastewater catchment	PO11 – Nutrient Neutrality	Discharges/ flows into designated site	NE comments

Billingshurst	NA	Yes – into/ upstream Upper Arun SSSI Upstream of Arun Valley SPA, SAC and Ramsar Pulborough, Amberley and Waltham Brooks	Moderate sized works upstream of Habitats sites, likely to fail condition assessment (CA) underway – should be moderately significant?
Bosham	Moderately significant	Yes – Chichester and Langstone Harbours SPA and Ramsar, Dorset and Solent Coast SPA, Solent Maritime SAC and Chichester Harbour SSSI and AONB	This is directly into designated sites failing conservation objectives and in unfavourable declining condition with existing NE NN methodology - move to very significant.
Clapham	Moderately significant	No	Does not appear to discharge into a designated site so it is unclear why NN was selected for this works
Coldwaltham	Moderately significant	Yes – Waltham Brooks SSSI, Arun Valley SPA Ramsar SAC	Should be very significant and improve for investment strategy – direct into ditch on Waltham Brooks SSSI, site is failing for conservation objectives and likely to fail CA. Small works but is direct into ditch. There is a possibility this may move to prioritisation red as a result of the no deterioration investigation into the southern water abstractions impacting this site and the ongoing CA.
Poling	Moderately significant	No – upstream of Climping beach	Very small works unclear why this is moderately significant.
Pulborough	NA	Yes? Check connectivity to Arun Valley designated sites including Pulborough Brooks SSSI	Likely to have connectivity to Arun Valley designated sites. Needs to be reviewed and changed to moderately significant if connected but keep as improve.
West Stoke	NA	Yes – appears to be upstream of Chichester & Langstone Harbours SPA etc	Unclear why NA as appears to be connected to Chichester Harbour – check connectivity?

#### Options appraisal

This should include regard to existing and emerging strategic solutions on climate change adaptation around Chichester Harbour and the emerging nutrient neutrality strategic solutions for the water supply neutrality strategy for the Sussex North WRZ (part of the Arun and Rother Valley).

There are also a number of catchment and other partnerships such as the Manhood peninsula partnership and the Arun and Western Streams Partnership as well as projects such as the CHaPRoN project, which should be factored in, collaboration will help expand the delivery of nature-based solutions.

#### 4.1.1 Cuckmere and Pevensy Levels

##### Nutrient Neutrality

Table 3: Specific comments based on PO11 (nutrient neutrality). Comments from Natural England's previous response which have not been addressed.

Wastewater catchment	PO11 – Nutrient Neutrality	Discharges/ flows into designated site	NE comments
Catsfield	Moderately significant	NA	NE unsure why flagged for NN as unsure which site it connects to.
Hailsham South	Not flagged/ NA	Yes – Pevensy Levels SAC, Ramsar and SSSI	Change to moderately significant as although there will be upgrades to TP limits, there is also a need to consider TN (flows into Pevensy Levels SAC, Ramsar, SSSI)? - Need to have an option to look at TN with the upgrades (will be added on for medium term)
			- Would be useful to have a nutrient budget option as it would be useful to get an indication of other WwTWs in the catchment for the designated site – point/ diffuse sources, apportionment
Hailsham North	Not significant	Yes – Pevensy Levels SAC, Ramsar and SSSI	Change to moderately significant as although there will be upgrades to TP limits, there is also a need to consider TN.
Bodle Street	Not significant	Yes – Pevensy Levels SAC, Ramsar and SSSI	Change to moderately significant

##### Options Appraisal

Limited use of nature-based solutions, opportunities for these are high in the catchment so these should be considered.

#### 4.1.1 East Hampshire

##### Nutrient Neutrality

It is unclear why some WwTW are classified as moderately significant and others very significant for nutrient neutrality in this catchment. The classification should be consistent across all WwTWs that are within the boundary of any catchments where nutrient neutrality in the Solent already applies.

Table 4: Specific comments based on PO11 (nutrient neutrality). Comments from Natural England's previous response which have not been addressed.

Wastewater catchment	PO11 – Nutrient Neutrality	Discharges/ flows into designated site	NE comments

Droxford	Not taken through to BRAVA	Yes – Titchfield Haven SSSI, Lee on Solent to Itchen Estuary SSSI, Solent and Southampton Water SPA and Ramsar, Solent and Dorset Coast SPA	This should be reviewed in light of the NN objective, and a BRAVA assessment undertaken if needed. This works discharges to a priority river habitat.
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#### Options Appraisal

It is positive to see that nutrient budgets have been included in the options list for both wastewater treatment works taken forward for further investment. It is also positive to see investigations into natural flood management and use of SuDS are considered.

#### 4.1.1 Isle of Wight

##### Nutrient Neutrality

It is unclear why some WwTWs are classified as moderately significant and others very significant for nutrient neutrality in this catchment, as many of them discharge into the Solent and therefore are included within the boundary of where nutrient neutrality already applies.

Table 5: Specific comments based on PO11 (nutrient neutrality). Comments from Natural England's previous response which have not been addressed.

Wastewater catchment	PO11 – Nutrient Neutrality	Discharges/ flows into designated site	NE comments
Blackwater	Moderately significant	Medina Estuary SSSI/ Solent and Dorset SPA / Solent and Southampton Waters SPA and Ramsar, Solent Maritime SAC	Unclear why not very significant for NN due to discharging to the Solent catchment.
Calbourne	Moderately significant	Newtown Harbour SSSI / Solent and Southampton Water SPA / Solent and Southampton Water Ramsar / Solent Maritime SAC	Unclear why not very significant for NN due to discharging to the Solent catchment.
Chale	Moderately significant	Cridmore Bog SSSI / Solent and Dorset SPA / Maritime SAC	Unclear why not very significant for NN due to discharging to the Solent catchment.
Chillerton	Moderately significant	The Wilderness SSSI / Medina Estuary SSSI / Solent and Dorset SPA / Solent and Southampton Waters SPA and Ramsar, Solent Maritime SAC	Unclear why not very significant for NN due to discharging to the Solent catchment.

Newlands Merstone	Not taken through to BRAVA	Medina Estuary SSSI / Solent Maritime SAC / Solent and Southampton Waters SPA and Ramsar Solent Dorset Coast SPA	Unclear why this site is not flagged for nutrient neutrality objective (or any POs) as the site discharges to the Solent catchment. This must be put into the NN methodology.
Newtown IOW	Moderately significant	Newtown Harbour SSSI / Solent Maritime SAC / Solent and Southampton Water RAMSAR / Solent and Dorset Coast SPA	Unclear why not very significant for NN due to discharging to the Solent catchment.
North View Thorley	Moderately significant	Yar Estuary SSSI / Solent and Southampton Water SPA / Solent and Dorset Coast SPA / Solent Maritime SAC	Unclear why not very significant for NN due to discharging to the Solent catchment.
Shalfleet	Moderately significant	Newtown Harbour SSSI / Solent Maritime SAC / Solent and Southampton Water Ramsar / Solent and Dorset Coast SPA	Unclear why not very significant for NN due to discharging to the Solent catchment.
St Helens	Not significant	Brading Marshes to St Helen Ledges SSSI / Solent and Southampton Water Ramsar / Solent and Southampton Water SPA	Unclear why not very significant for NN due to discharging to the Solent catchment.

#### Options Appraisal

For the wastewater system taken forward for investment it is good to see the option of a nutrient budget investigation. We would like to see more options of nature-based solutions in this catchment.

#### 4.1.1 Medway

##### Nutrient Neutrality

Overall, the proposed investment strategy looks mostly accurate for these WwTW catchments, with many WwTWs proposed for improvement.

Table 6: Specific comments based on PO11 (nutrient neutrality). Comments from Natural England's previous response which have not been addressed.

Wastewater catchment	PO11 – Nutrient Neutrality	Discharges/ flows into designated site	NE comments
Biddenden	Moderately significant	No	Unsure why this has been flagged for NN as does not discharge into designated sites – please confirm.

Copthorne	Not significant	No	This treatment works is not in figure 2 of the map of Medway catchment (strategic context doc)
Gravesend	Not significant	South Thames Estuary and Marshes SSSI and Thames Estuary and Marshes SPA, Ramsar.	This should be changed to moderately significant.
High Halden	Very significant	No	Unclear why very significant for NN – please clarify (not connected to Habitats sites).

#### Options Appraisal

Aylesford WwTW scored as moderately significant for 8 of 14 POs, has expected growth of >20% and serves a population of 126,630 but has not been taken forward for investment and is low concern – further justification for this decision is required, it is NE’s view that this should be added.

Investigations into nutrient budgets is not used widely in the options for this catchment (only in one wastewater system options list) – we would recommend wider use of this option to better understand sources and pathways of nutrients into Habitats sites. Additionally, we would recommend wider use of nature-based solutions in the options lists (including natural flood management and SuDS).

#### 4.1.1 New Forest

##### Nutrient Neutrality

It is unclear why some WwTW are classified as moderately significant and others very significant for nutrient neutrality in this catchment, they all discharge to the New Forest and Solent catchment and therefore are all covered by Solent nutrient neutrality. Minstead and Bank WwTW were not taken through to BRAVA, this should be reviewed in light of the NN objective, as it will apply to these sites also.

#### Options Appraisal

It is good to see that developing a nutrient budget has been included in the options for all of the wastewater systems taken forward for investment in this catchment.

#### 4.1.2 North Kent

##### Nutrient Neutrality

NE agree with the conclusion that all wastewater systems in this catchment are very significant for the nutrient neutrality planning objective as all discharge into The Swale / Medway Estuary & Marshes Habitats sites.

#### 4.1.3 Stour

##### Nutrient Neutrality

The Stour catchment already has nutrient neutrality in place, due to Stodmarsh SPA, SAC, Ramsar and SSSI being in unfavourable condition where water quality (nutrients - N and P) Common Standard Monitoring Guidance (CSMG) targets are not being met. This site is also currently under water resource pressure. WINEP investigations are currently underway to understand the source apportionment and attribution of Southern Water’s assets and associated existing water quality impacts to Stodmarsh Lakes. For this reason, all treatment works which discharge to or upstream of Stodmarsh should score very significant for PO11.

Table 7: Specific comments based on PO11 (nutrient neutrality). Comments from Natural England's previous response which have not been addressed.

Wastewater catchment	PO11 – Nutrient Neutrality	Discharges/ flows into designated site	NE comments
Chilham	Moderately significant	Stodmarsh SAC/SPA/Ramsar/ SSSI.	This should be very significant. This WwTWs is included in nutrient neutral methodology for development in the Stour.
Dambridge Wingham	Moderately significant	Possibly – back of tide to Stodmarsh.	This should be very significant. This WwTWs is included in nutrient neutral methodology for development in the Stour.
Good Intent Cottages Egerton	Not taken through to BRAVA	Stodmarsh SAC/SPA/Ramsar/ SSSI is downstream.	This should be very significant for nutrient neutrality – why not flagged in the risk-based catchment screening? This WwTWs is included in nutrient neutral methodology for development in the Stour.
Lenham	Moderately significant	Stodmarsh SAC/SPA/Ramsar/ SSSI is downstream.	This should be very significant. This WwTWs is included in nutrient neutral methodology for development in the Stour.
Margate and Broadstairs	Moderately significant	Unknown	This treatment works is not in figure 2 of the map of Stour catchment (strategic context doc)
May Street Herne Bay	Moderately significant	Stodmarsh SAC/SPA/Ramsar/ SSSI.	This should be very significant. This WwTWs is included in nutrient neutral methodology for development in the Stour.
Nats Lane Brook	Moderately significant	Stodmarsh SAC/SPA/Ramsar/ SSSI. Also, Wye and Crundale Downs SSSI.	This should be very significant. This WwTWs is included in nutrient neutral methodology for development in the Stour.
Westbere	Moderately significant	Stodmarsh SAC/SPA/Ramsar/ SSSI.	This should be very significant. This WwTWs is included in nutrient neutral methodology for development in the Stour.

#### 4.1.1 Test and Itchen

##### Nutrient Neutrality

It is unclear why some WwTWs are classified as moderately significant and others very significant for nutrient neutrality in this catchment, as they all discharge to the Solent catchment where nutrient neutrality already applies.

Table 8: Specific comments based on PO11 (nutrient neutrality). Comments from Natural England's previous response which have not been addressed.

Wastewater catchment	PO11 – Nutrient Neutrality	Discharges/ flows into designated site	NE comments

<p>Barton Stacey, Canterton Lane Brook, Chilbolton, Dunbridge, Ivy Down Lane, Ludgershall, New Alresford, Overton, Redlynth, Romsey, Sadlers Close Sutton Scotney, Stockbridge, West Wellow, Whitchurch</p>	<p>Moderately significant</p>	<p>River Test SSSI, Lower Test Valley SSSI, Solent Maritime SAC, Solent and Southampton Water SPA and Ramsar, Solent and Dorset Coast SPA</p>	<p>Unclear why NN is classed as moderately significant and not very significant due to the lack of nitrogen permits on the Test and Itchen WwTW that are in the Solent catchment. Suggest NN is increased to very significant.</p>
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**Options Appraisal**

It is positive that nutrient budget investigations have been picked up widely as an option in the wastewater systems requiring investment.

**Annex 4**

**Natural England’s Advice on Southern Water’s DWMP Public Consultation Response Form**

**Consultation Questions**

Please read the statements below then select an answer that best reflects your views on the draft DWMP.

**Section 1: Planning for the Future**

**Q.1 The main challenges for drainage and wastewater management are identified in the DWMP.**

Please refer to the section on page 10 in the draft Regional DWMP

Strongly Agree    Partially Agree    Neutral / No opinion    Partially Disagree    Strongly Disagree

X

**Q.2 What do you consider to be the most important future challenges?**

Climate change (to include risks to water resources/supply and water quality) Nutrient enrichment  
Population growth  
Keeping rivers, lakes, reservoirs and coasts healthy and clean

Additional challenges (as well as those included in the list) should also consider impacts to water dependent designated sites, priority habitats and species – not just rivers, lakes, reservoirs and coasts, such as peatland, fen marsh, mire, wetlands, etc. Invasive Non-Native Species should be covered under this list.

In regard to climate change, Natural England has also developed the ‘[Climate Change Adaptation Manual](#)’ which assesses the vulnerability of priority habitats to climate change. This is based on a climate change adaptation principle for biodiversity. This tool may be useful to identify why an area of priority habitat is vulnerable to climate change

and the interventions to consider in terms of wider gains to provide the most impactful increases in climate change resilience building.

**Q.3a** **Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater.**

Please refer to the section on page 13 in the draft Regional DWMP

Strongly Agree    Partially Agree    Neutral / No opinion    Partially Disagree    Strongly Disagree

X

**Q.3b** **Please explain your answer:**

Working with other organisations is vital in management of drainage and wastewater, to ensure we get the most out of investment, tackle the challenges identified to the greatest capacity, and enhance resilience. The responsibility of managing wastewater and drainage does not sit only with water companies so it is important to take a collaborative approach by including other organisations. We think that these have been considered well within the dDWMP. It will be important to consider in combination effects with other plans and projects outside of Southern Water's plans to determine the full effects of plans on the environment.

## Section 2: Creating Resilient Wastewater Systems

Please refer to the section on page 22 of the draft Regional DWMP

**Q.4** **The priorities for future investment should be:**  
Please rank these from 1 (highest) to 5 (lowest):

### Investment Plan Priority Order

Wastewater Compliance and Pollution	Sewer Condition and Groundwater Pollution	Storm Overflows	Sewer Flooding	Enhancing the Environment
4	3	2	5	1

**Q.5** **Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows.**

Strongly Agree    Partially Agree    Neutral / No opinion    Partially Disagree    Strongly Disagree

X

**Q.6 Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches.**

Strongly Agree	Partially Agree	Neutral / No opinion	Partially Disagree	Strongly Disagree
X				

**Q.7 Please explain the reasons for your answers to questions 4 to 6 above:**

Nature based solutions should be prioritised as methods to make improvements as they have many additional benefits for the environment. NBS typically provide huge opportunity in adaptation to climate- related risks, whilst also delivering multiple benefits for nature, and also economic and social benefits. We understand that Southern Water is limited in what they can do but where possible we would like to see more of these options taken forward. Catchment wide solutions are also pivotal in enhancing the resilience of wastewater systems at a local and regional level.

Natural England encourage that the regional plans look to

### Section 3: Investment Needs

Please refer to the section on page 64 of the draft Regional DWMP

**Q.8a Southern Water should prioritise *best value* options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer- term, rather than least cost.**

Strongly Agree	Partially Agree	Neutral / No opinion	Partially Disagree	Strongly Disagree
X				

**Q.8b Please explain your answer:**

This is an approach that Natural England support, particularly if this can involve identifying innovative ways to work in partnership, through nature-based solutions, to address issues relating to the plan but

also with the aim of enhancing and restoring catchments, from the agricultural to urban landscape, to help improve infiltration and hydrological function. The plan should look at how catchment-based solutions could help to weave hydrological and environmental resilience into systems. This will contribute towards achieving many targets/goals set within the Environment Act.

**Q.9a The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase.**

Strongly Agree	Partially Agree	Neutral / No opinion	Partially Disagree	Strongly Disagree
X				

**Q.9b Please explain your answer:**

**Q.10a I support the range and type of investment needs identified in the five Investment Plans.**

Strongly Agree	Partially Agree	Neutral / No opinion	Partially Disagree	Strongly Disagree
	X			

**Q.10b Please explain your answer:**

Generally, the range and types of investment needs are well considered with clear options for reducing impacts. We would like to see more nature-based solutions in addressing the investment needs, especially in the investment plan for the Environment. We would recommend wider use of nutrient budget investigations to better understand the effects of wastewater systems on sensitive water dependent designated sites and protected habitats.

**Q.11 Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated (see page 69 of our Level 1 DWMP). Which policy scenario(s) would you most support?**

Protecting the environment	Protecting public health in designated bathing waters	Ensuring storm overflows operate only in unusually heavy rainfall events everywhere	I do not support any of the policies	I don't know
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X

**Q.12 The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan.**

Strongly Agree	Partially Agree	Neutral / No opinion	Partially Disagree	Strongly Disagree
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X

Section 4: Strategic Environmental Assessment

**Q.13a This question is optional for customers, but we would like environmental regulators to respond.**

**Do you have any comments on the Strategic Environmental Assessment of our DWMP?**

Please read the Strategic Environmental Assessment (SEA) draft Environmental Report before answering this question.

Yes

**Q.13b Please explain your answer:**

Please refer to our response in Annex 1 of this response.

Section 5: Final Thoughts

**Q.14a Overall, I support the approach set out in Southern Water's first Drainage and Wastewater Management Plan.**

Strongly Agree	Partially Agree	Neutral / No opinion	Partially Disagree	Strongly Disagree
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X

**Q.14b What did you like about our DWMP?**

Please refer to comments in Annexes 1 and 3 for further information.

**Q.14c What do we need to improve in our DWMP?**

We agree that there is further work to do on the SEA and HRA and wider documentation where the environment should be regarded and appropriately considered. Please refer to comments in Annexes 1 and 4 for further information.

**Annex 5**

**Natural England's Role in Advice to the Water Sector**

Natural England was established under the Natural Environment and Rural Communities Act 2006 ("2006 Act"). It is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has responsibility for ensuring that landowners and public bodies deliver objectives for European protected sites (Habitats sites) Ramsar sites (internationally important wetland sites) and the requirements for achieving and managing favourable or recovering condition for Sites of Special Scientific Interest (SSSI). Of particular note to water companies are the objectives introduced through the Water Framework Directive 2000/60/EC ("WFD") for Habitats sites protected areas, to achieve compliance with the standards and objectives (conservation objectives) of the water-dependent features of those sites by December 2015 (Article 4.2 WFD) unless derogated to a later date.

Natural England is also charged with helping to deliver objectives to biodiversity and landscape in Defra's 25 Year Environment Plan in addition to the statutory duties toward biodiversity under the 2006 Act. The 25 Year Environment Plan has themes relevant to water and biodiversity throughout the key objectives. Complementary to these objectives Natural England published '**Conservation 21: Natural England's conservation strategy for the 21st century**', setting out how to support the government's ambition for a healthy natural environment on land and at sea that benefits people and the economy. Underpinned by our focus on delivering better long-term outcomes for the environment by working towards shared visions with partners, Conservation 21's three guiding principles are: 1) creating resilient landscapes and seas; 2) putting people at the heart of the environment; and 3) growing natural capital. In support of this, our response therefore provides advice, where appropriate, on how the plan can embrace an ecosystem approach, enhance natural capital and can support the conservation of biodiversity at a landscape scale.

Natural England continues to aim to work with the water sector to ensure that requirements for the protection and enhancement of the natural environment are met and that there is adequate opportunity for the development of more sustainable solutions. Protection and enhancement of the natural environment including biodiversity depend critically on delivering improved, integrated and sustainable land and water management.

ID 4043

REF: NFCP 050922



By email: [dwmp@southernwater.co.uk](mailto:dwmp@southernwater.co.uk)

Dear Consultation Coordinator

### **Draft Drainage and Wastewater Management Plan Consultation**

This response summarises views from a range of stakeholders represented in the work of the New Forest Catchment Partnership, co-hosted by the New Forest National Park Authority in collaboration with the Freshwater Habitats Trust. It is based on liaison with partners, knowledge of their strategic objectives for the catchment and shared vision expressed within the New Forest Water Environment Improvement Plan produced by the Partnership (which at that time received representation from Southern Water) and which constitutes the 'catchment plan' for the area.

Individual partners are likely to respond separately in addition to these comments, in order to address the wide-ranging concerns of partners the response is necessarily strategic but focusses on particular areas of concern which are best made via a bespoke response rather than the online tool.

The Partnership has been pleased to engage with Southern Water regarding the DWMP and we feel the sessions we have been involved with have been well run and aided stakeholder's understanding of how the national process operates, and the approach Southern Water were taking to it, which allowed some recognition of regional issues. The web-based information provides some transparency to the process and rationale and has been an aid to us in engaging with the process.

Consideration of future climate change and growth is welcomed as well as recognition of the need for more joint action to address nutrient neutrality. Broadly, we feel appropriate future challenges have been identified.

The steps have been outlined and rationale explained for prioritisation, although as you will see from later comments, we feel lack of data locally related to nature recovery/designated site issues may be a limiting factor and generally the framework

water companies must work within does not allow for the necessary rapid response and investment in solutions issues considered to be contributing to the nature crisis (e.g. combined sewer overflows).

Given the importance attached to environmental quality in the New Forest catchment by stakeholders, and the statutory duties that apply to bodies operating in such highly designated nature and landscape areas, it is no surprise that the Catchment Plan and views of stakeholders support the enhancement of the environment being key for DWMP in the New Forest and its surroundings and the key priority. If this is to be achieved, the impacts of CSOs must be addressed as a matter of urgency and that would therefore be similar priority (or if your consultation does not allow, a major and linked second priority). There are certain urban areas of the catchment where sewer condition is a concern and that would be recognised in our third priority.

We consider that there is a strong case for risks which have potential impacts on biodiversity such as CSO to be reduced to 0 (zero) and would invite regulators, operators and partners to work together to achieve this and put in place systems that facilitate it, even if these represent a change from the status quo. Many would actually say the definition of 0 still have environmental impacts as impacts are still allowed through a significant number of discharges. Nationally and internationally important landscapes and habitats should not be exposed to environmental risk and we would support Southern Water in advancing such a case to regulators. We would also support the urgent need for investment which is not necessarily the least cost.

The overall DWMP should acknowledge that catchments such as New Forest merit particular approaches and focus for delivery, which mean that whilst multiple objectives are desirable, there is value and benefits for investment in certain priorities such as enhancing environmental quality and contributing to nature recovery. Whilst the New Forest may have lower population compared to some other parts of the Southern Water operational area, its special environmental qualities generate over 13.5 million person visit per year with associated interest in the performance of those managing the environment, and it is highly prized by residents as well as being a natural asset of national importance.

As we have expressed in the DWMP workshops, we feel a particular weakness of the DWMP is the lack of targeted and qualitative data relating to environmental quality. The WFD and SSSI condition assessments on which the process is based are necessarily limited in their scope and relate to specific objectives, they therefore do not fully represent the threats operations pose to wider biodiversity and nature recovery. Research shows that potentially 50% of invertebrate species are lost from waterbodies in good condition as compared to high, the WFD target is therefore hardly one that will delivery nature recovery.

In particular we feel the interaction of CSO with the new Forest's riparian, wetland and terrestrial habitats is not well represented and would urge regulators and those involved in DWMP to consider ways of the metrics incorporating precautionary

strategic measurements and allowing for local expert opinion to help drive prioritisation and investment, whilst maintaining a robust level of strategy. National and local stakeholders have undertaken significant investment to improving the physical WFD and SSSI quality of waterbodies in the catchment and this has achieved significant benefits for nature, however the quality of water which is connected to the floodplain is also of prime importance and this is now a cause for significant concern in the local community.

We note the DWMP proposals in reducing the burden on WWTW by separation of flows and catchment/nature based solutions. The former is of benefit as it would provide long term solutions that are more robust in the face of climate change effects and represent very welcome targets for investment, however in the New Forest context we consider here is an exigent case for Southern Water to also be prioritising urgent investment in WWTW infrastructure to address immediate problems which compromise nature recovery. The highest level of investment is merited, and we therefore support investment measure that prioritise the protection of the environment.

As we have expressed in the DWMP workshops, regulators, water companies and those involved in the process should be mindful that stakeholders on the ground are already working on catchment scale solutions and enhancements, particularly in the New Forest to address the need for nature protection and recovery. In our experience the poor performance of water companies and past practices can represent a significant barrier to landowner/managers and individual voluntary involvement, and their willingness to contribute time and their own financial investment into projects. The DWMP and WINEP processes therefore need to be afforded the ability to achieve the highest level of investment possible and demonstrate urgent action to address issues is underway. A short-term pressure for investment may then be rewarded by greater collaborative working and catchment scale solutions that may be capable of minimising costs in the longer term.

Thank you for seeking feedback on the process, the Partnership would be willing to provide further clarification as required. We look forward to building on the collaboration the DWMP has facilitated to aid joint working. We would suggest Southern Water puts in place opportunities and resources for ongoing collaborative working at a catchment scale as part of its business response to the DWMP strategic challenges. This is particularly important in an area such as New Forest where Southern water have legislative duties to have regard to nature conservation designations and National Park purposes in its operations. Moreover, there are significant opportunities for Southern Water to be a part of making the New Forest one of the most important exemplars for Nature recovery in the UK, with associated benefits to its business. We would welcome the opportunity to work with Southern Water to make nature recovery a reality in the New Forest through improvement to water quality.

Your faithfully



Ecologist  
New Forest National Park Authority  
(acting in role as co-host of the New Forest Catchment Partnership)

ID 4041

REF: NFPA 070922



By email: [dwmp@southernwater.co.uk](mailto:dwmp@southernwater.co.uk)

7 September 2022

Dear Consultation Coordinator

### **Draft Drainage and Wastewater Management Plan Consultation**

The New Forest National Park Authority welcomes the engagement undertaken by Southern Water in the development of the draft Drainage & Wastewater Management Plan. The Plan-preparation process is complex and the stakeholder events and supporting web-based information have provided opportunities for consultees to understand the key considerations that have been taken into account.

It is noted that Southern Water has produced an accompanying Strategic Environmental Assessment draft Environmental Report - [Strategic Environmental Assessment \(southernwater.co.uk\)](#) – and this is supported. We would query whether the Drainage & Wastewater Management Plan should also be subject to a Habitats Regulations Assessment, as a ‘plan or project’ which would impact on the integrity of internationally designated sites (Special Protection Areas and Special Areas of Conservation). This is particularly relevant for the New Forest and Solent coast areas – the New Forest National Park includes over 25 miles of the Solent coastline – which are designated as being of international importance for nature conservation. We would be interested to understand whether Southern Water discussed this matter with Natural England, given the range of designations in the region.

#### Draft Regional Level 1 DWMP and the New Forest catchment

The draft DWMP document identifies 12 significant challenges as the focus for Southern Water and partner organisations. These include climate change, tightening environmental permits and nutrient enrichment and we consider the key challenges have been appropriately identified.

(i) *Nutrient enrichment*

The draft Plan states, “*We are already deploying the best available technologies at many of our larger Wastewater Treatment Works (WTWs), and expect further investments to be needed in*

*the future to help restore internationally designated habitat sites to favourable condition where we have identified the need for improvement.”*

Recent amendments to the Levelling Up & Regeneration Bill would – if ultimately enacted in 2023 – place a new legal duty on water companies in England to upgrade wastewater treatment works by 2030 in ‘nutrient neutrality’ areas to the highest achievable technological levels. The performance of existing Southern Water wastewater treatment works (WwTWs) varies considerably based on the current limits in environmental permits issued by the Environment Agency. It is proposed that the new statutory obligation from 2030 would require WwTWs to operate at the technically achievable limit - for phosphates this is 0.25mg/l and nitrates 10mg/l.

A new statutory obligation for upgrading WwTWs to ensure that treatment works in nutrient neutrality catchments such as the Solent are operating at the highest level of performance would reduce the pollution from not only new development, but also from the majority of existing dwellings in affected catchments. Page 60 of the draft DWMP states, “*Many of our wastewater systems, but not all, are already using the best available technology so, currently, we cannot strip further nutrients from discharges at these WTWs. However, innovations in technology are ongoing and will be deployed to address the issues if the necessary funding is secured.*” It should be noted that the smaller treatment works in the New Forest National Park do not have the best available technology for nitrate stripping and so the proposals set out in the draft Bill would be a significant improvement for WwTWs in the New Forest, where discharges currently average 27 mg/l for nitrates.

It is appreciated that: (i) this proposed amendment to the Levelling Up & Regeneration Bill was only recently made; (ii) therefore Southern Water has not had the opportunity to reflect the proposed requirement in the draft DWMP currently out for consultation; and (iii) it will require the Bill to be legally enacted before it is given full weight. However, in taking the draft DWMP forward, in preparing the Business Plan for submission as part of the Ofwat Price Review 2024 (PR24), and to support the development of the Water Industry National Environment Programme (WINEP) for 2025-2030, we would call for Southern Water to give further coverage to this matter for the Solent (and Stodmarsh) catchment.

(ii) *Working with others*

The consultation undertaken for the river basin catchments (including the New Forest) has helped a range of stakeholders engage with Southern Water. This includes the National Park Authority and the New Forest Catchment Partnership, who have responded separately. It is essential that Southern Water continues to work effectively with partner organisations and stakeholders to address the significant challenges identified in the Plan.

For example, it is clear that nature-based solutions should be the focus for investment, implemented in conjunction with new technology where appropriate. Such an approach is consistent with the Government’s agenda on tackling climate change, nature recovery and increased access to nature for the public. The Authority therefore strongly agrees (Option 1) in response to the consultation question regarding ‘catchment-wide and nature-based solutions should be prioritised over traditional engineering approaches’ and would welcome an opportunity to work with Southern Water to identify potential schemes in the New Forest catchment.

(iii) *Environmental Enhancement*

The draft DWMP recognises that ‘receiving waters’ in the Southern Water region may be rivers and streams, ponds, wetlands or coastal waters, many of which have national and international designations. These include SSSIs, Special Areas of Conservation, Special Protection Areas and Ramsar sites – all of which are designated within the New Forest National Park. We therefore support the inclusion of the Planning Objectives relating to ‘Achieving Good Ecological Status / Good Ecological Potential (PO9) and ‘Securing Nutrient Neutrality’ (PO11). The draft DWMP rightly references the work of the Catchment Partnerships on delivering against these objectives.

Given the importance attached to environmental quality in the New Forest catchment by stakeholders and statutory designations, we support the call for environmental enhancement to be a key priority for the DWMP for the New Forest catchment area. No other part of the Southern Water region is covered by such a broad range of national landscape and international nature conservation designations. Southern Water’s future plans for the New Forest catchment must reflect its environmental status. Nationally and internationally important landscapes and habitats should not be exposed to environmental risk and we would support Southern Water in advancing such a case to regulators. The overall DWMP should acknowledge that catchments such as New Forest merit particular approaches and focus for delivery, which mean that whilst multiple objectives are desirable, there is value and benefits for investment in certain priorities such as enhancing environmental quality and contributing to nature recovery.

We hope these comments are helpful to Southern Water as you continue to develop the Drainage and Wastewater Management Plan and please get back to us if you require further clarification or would like to discuss any of the points raised in this response.

Your faithfully

██████████  
Policy & Conservation Manager  
New Forest National Park  
Authority  
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Ofwat: - DWMP consultation response letter\_SRN



Centre City Tower, 7 Hill Street, Birmingham B5 4UA 21 Bloomsbury  
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By email to

██████████@southernwater.co.uk  
dwmp@southernwater.co.uk

30 September 2022

Dear ██████,

## Ofwat's consultation response on the Southern Water draft drainage and wastewater management plan 2022

Thank you for the opportunity to comment on your draft drainage and wastewater management plan (dDWMP) published for consultation in June 2022.

The purpose of your plan is to cover how you will manage and develop your drainage and sewerage system so you are able, and continue to be able, to meet your relevant obligations under the Water Industry Act 1991<sup>1</sup>. We expect you to challenge yourself to produce high-quality, long-term plans covering all the aspects necessary for your wastewater business to be effective in line with your legal obligations.

While DWMPs themselves are still relatively new, understanding wastewater network risks and investment planning are not new. This is core to you fulfilling your general duty to provide and maintain a sewerage system and relevant licence obligations. As such you should be able to build on the data, models and suite of options that are available to you as a result of this previous planning activity.

This letter sets out our consultation response on your dDWMP. Below we provide our comments on the quality and robustness of your plan, and reiterate our expectations for final DWMPs, including how these could provide the background evidence for your long-term wastewater delivery strategy and investment requirements for PR24. We have set out where we consider you need to make improvements between now and final plans.

In assessing companies' dDWMPs, we have considered our statutory duties and the UK and Welsh Governments' strategic priorities statements for Ofwat<sup>2,3</sup>. We have also considered the

<sup>1</sup> Specifically Part IV including section 94 as supplemented by the Urban Waste Water (England and Wales) Regulations 1994.

<sup>2</sup> Defra, '[The government's strategic priorities for Ofwat](#)', updated March 2022

<sup>3</sup> Welsh Government, '[Strategic Priorities and Objectives Statement to Ofwat](#)', July 2022

(Water UK) Framework for the production of a DWMP,<sup>4</sup> and the DWMP Guiding Principles,<sup>5</sup> which

set out the priorities and expectations for DWMPs of the UK and Welsh Governments and the environmental and economic regulators. We have also considered them in light of our expectations for strategic planning frameworks for PR24,<sup>6</sup> and our final guidance on long term delivery strategies.<sup>7</sup>

We would like to reiterate that we will not endorse any parts of your DWMP in advance of the PR24 process. Where we have previously set out expectations, for example in our pre-consultation / early engagement feedback to companies<sup>8</sup> ('pre-consultation feedback'), but these have not yet been addressed, you should address our comments for your final DWMP. All our comments in this letter and our industry overview letter (to follow) regarding dDWMPs 2022 are without prejudice to any subsequent decisions that we make during PR24 in connection with your business plan and Ofwat's ongoing enforcement cases and wider investigations into companies' operation of their wastewater treatment works.

Should we still have concerns that your final DWMP does not present the right investment decisions, or that the quality of plan and evidence presented is unsatisfactory, we reserve the right to treat such plans as not having sufficient and convincing evidence for your long-term delivery strategy or your PR24 investment cases. Companies should reflect our comments when finalising their DWMPs so that the plans support the evidence required for PR24 (noting the synergies in the work), rather than developing PR24 business case material separately in parallel.

We strongly encourage you to take on board the comments that we make and that you work to improve your DWMP ahead of the final submission. We will continue to work closely with companies, governments and other regulators in England and Wales to maintain and improve the wastewater services through PR24 and beyond to future planning cycles.

## Feedback on key aspects of your draft plan

### 1. Overall DWMP plan quality: planning objectives and risk assessment

As part of our assessment, we have considered the overall quality and accessibility of the published consultation material, how companies have considered common and bespoke planning objectives, how adaptive planning approaches have been used to provide visibility of how preferred interventions consider current needs while allowing for future flexibility, and how risks have been identified over the planning horizon.

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<sup>4</sup> WaterUK, '[A framework for the production of Drainage and Wastewater management Plans](#)', September 2021

<sup>5</sup> UK and Welsh Governments and the environmental and economic regulators (including Natural Resources Wales, Environment Agency and Ofwat), '[Guiding principles for drainage and wastewater management plans - GOV.UK \(www.gov.uk\)](#)', August 2022

<sup>6</sup> Ofwat, '[Ofwat's expectations for strategic planning frameworks at PR24](#)', November 2021

<sup>7</sup> Ofwat, '[PR24 and beyond: Final guidance on long-term delivery strategies](#)', April 2022

<sup>8</sup> Ofwat, DWMP Pre-consultation / early engagement feedback issued to companies, April/May 2022.

We consider that your dDWMP was generally well structured and technically well developed. It closely follows the technical framework and includes the expected documentation. We note that your plan indicates six common and eight bespoke planning objectives and explains your collaboration with stakeholders in developing those.

- Your dDWMP includes a 2020 baseline and a 2050 planning horizon as part of BRAVA. However, it is unclear whether you have undertaken the same assessments for intervening planning horizons (5- or 10-years).
- We consider that your plan demonstrates an awareness of adaptive planning and the need to prioritise low-regret investments, and your dDWMP assesses what elements of your system require future investment and prioritisation to reduce risks. However, it is unclear what scenarios and pathways are being used to inform this analysis.
- We note your ambition regarding investment in technology to create smart networks to maximise the use and capacity of your existing drainage system. We welcome this and you should set out clearly in your final plan how this will be used to address some of the risks you have identified. You should clearly set out how asset management and optimisation (base expenditure activities) can address some risks, such as, providing additional hydraulic capacity headroom in the system, as part of a hierarchy of options, before recommending enhancement schemes. You should ensure that you continue to be able to meet all legal obligations, both now and in the future.

## 2. Decision making and option appraisal

As part of our assessment, we have considered the level of ambition around prioritising improvements from base expenditure allowances and prioritising nature-based or partnership solutions. We also assessed whether companies have provided sufficient and convincing evidence that the right best value options for customers and the environment are put forward.

- In determining options to manage current or future uncertainties, our pre-consultation feedback to companies recommended that evidence for their preferred best value solutions is presented alongside alternative options, such as least cost. This was to demonstrate the incremental benefits and associated costs that a range of solutions could deliver and to understand the basis for pursuing certain solutions while rejecting others. In your dDWMP you have presented a set of preferred, prioritised options with high-level indicative costs to deliver against your planning objectives, but you have not clearly provided a comparison of alternative scenarios or options such as a least cost plan, to demonstrate to us that you are proposing the right long-term best value plan.
- As DWMPs look holistically at a range of risks and mitigations at catchment levels, we expect you to provide more evidence in respect of costs and benefits of solutions, particularly schemes that deliver multiple benefits. We consider that there is insufficient convincing evidence in your dDWMP on why alternative options were discounted. We note you consider that a best value approach includes interventions that reduces the risks to more than one of the 14 planning objectives and provides the best mix of social, economic and environmental benefits. However, you should provide further detail in your final plan to quantify the multiple benefits of options.

In our pre-consultation feedback, we stated the importance of considering where nature-based or green solutions could address the risks identified. This is a key consideration in the DWMP Guiding Principles<sup>9</sup> and the Defra storm overflow discharge reduction plan.<sup>10</sup> We asked that companies clearly explain why green solutions would not be feasible. We note that your plan is ambitious in terms of exploring nature-based solutions, but there is insufficient evidence to demonstrate that you have prioritised green solutions as your preferred options. We consider that there is insufficient convincing evidence on why alternative options were discounted, and you should explain why green options are not being pursued in your final DWMP.

- The DWMP technical guidance<sup>11</sup> and the DWMP Guiding Principles<sup>12</sup> state that companies cannot develop plans which deliver their full potential without the input of other stakeholders. Some risks and solutions identified in the DWMP planning process, such as surface water removal or separation, rely heavily on joint working with local authorities and other risk management authorities (RMAs). You mentioned how partnerships and co-funded schemes will be created as you secure funding and focus on delivering your DWMP in AMP8. However, it is unclear at this stage what opportunities you are actively pursuing and prioritising for us to understand your ambition and the likelihood that these schemes will materialise. In your final DWMP you should provide further detail on the likelihood of your partnership schemes going ahead, including timelines for delivery and the split in funding contributions, and be clear on the rationale for not progressing such schemes, where applicable.

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<sup>9</sup> UK and Welsh Governments and the environmental and economic regulators (including Natural Resources Wales, Environment Agency and Ofwat), [Guiding principles for drainage and wastewater management plans - GOV.UK](#), August 2022, Principle 2 - Resilient.

<sup>10</sup> Defra, '[Storm Overflows Discharge Reduction Plan](#)', August 2022

<sup>11</sup> WaterUK, '[A framework for the production of Drainage and Wastewater management Plans](#)', September 2021, pg 13

<sup>12</sup> UK and Welsh Governments and the environmental and economic regulators (including Natural Resources Wales, Environment Agency and Ofwat), [Guiding principles for drainage and wastewater management plans - GOV.UK \(www.gov.uk\)](#), August 2022 Principle 4 - Collaboration.

### 3. Storm overflow reduction plan

As part of our assessment, we have considered whether companies' plans aim to address Defra's storm overflow discharge reduction plan, how well companies understand and plan to address the root causes of storm overflow spills, and how clearly they have set out options and timelines for reducing the risks.

- We expect companies in England to make rapid progress in addressing storm overflow spills and meet the targets in Defra's storm overflow discharge reduction plan. Companies must ensure that they are complying with their obligations under section 94 of the Water Industry Act 1991 as supplemented by the Urban Waste Water (England and Wales) Regulations 1994. With regards to Defra's storm overflow discharge reduction plan, we are concerned that, although you explored Defra's storm overflow targets and provided indicative costs to meet some of them, your dDWMP focuses on an average of 20-spills which does not meet the Defra requirement. Other elements of the storm overflow targets appear to be missing from your dDWMP, including the requirements for screening storm overflows, eliminating environmental harm caused by storm overflows, and meeting bathing water targets for storm overflows. You also do not describe plans for engaging with customers (for example on sewer misuse) or ensuring assets are proactively maintained. We are therefore unclear on the scale of the requirements to deliver against these targets and what benefits they will deliver. Your final plan should take into consideration the storm overflow reduction plan targets in line with what companies were asked to incorporate. We also expect to see a more detailed and robust timeline (showing milestones and prioritisation) and evidence on the costs for these storm overflow schemes in your final DWMP.
- The DWMP Guiding Principles and the Defra's storm overflow discharge reduction plan state that companies are expected to consider green infrastructure, nature-based and low-carbon solutions to mitigating risks, where possible. In your plan, you discuss how significant rainfall attenuation (using different types of SuDs) will be required to address risks in your region. However, many of your prioritised investment needs describe storage

/ storage tanks or surface water separation as the preferred options, particularly to reach your own target of less than 20 storm overflow spills per year. It is unclear to us how ambitious and committed you are to prioritising nature-based solutions. In your final DWMP you should compare the costs and quantify the benefits of green and grey options, provide clarity on your decision-making approach for choosing one over the other, and explain the rationale as to why green options have been discounted.

#### 4. Costs, funding and affordability considerations

As part of our assessment, we have considered the maturity of companies' costs and benefits and how well they have been evidenced. We also considered whether affordability and bill impacts have been included for consultation, what the likely split is between base and enhancement expenditure, and whether opportunities for partnership funding have been fully explored.

- In line with the DWMP Guiding Principles, and the UK Government's strategic policy statement for Ofwat,<sup>13</sup> we expect your plan to be affordable and take account of customers' priorities. Costs should indicate the impact on affordability of bills. We note that you have provided cost options for the five investment plans, detailed by planning objective and a breakdown of indicative costs by site. However, we did not see sufficient and convincing evidence for the comparison of your best value and least cost options. For your final plan you should explain the range of costs and bill impacts associated with addressing customers' priorities for your overall preferred best value plan.
- We expected by this stage in the planning process that companies would have set out information on affordability and bill impacts so that we have a clearer understanding of how future risks would be addressed through base expenditure allowances and what would require enhancement funding. We note that you have provided costs for your preferred solutions only and it is not clear in your dDWMP if you have reviewed alternative solutions to compare costs and the impact on affordability.
- We asked companies to provide details of significant, material investment requirements, such as tackling storm overflows, in draft and final DWMPs and PR24 business plans. We are aware of two specific treatment works compliance schemes that you consider to be significant and you will have large programmes of works, such as addressing storm overflows, that will be material. However, your DWMP does not yet represent the requirements of the Defra storm overflow plan and so your investment needs will change as you rework your plan. Your final plan will need to reflect government, company and customer priorities and should provide clarity around the timeline and costs required to deliver against these targets.

#### 5. Stakeholder engagement

As part of our assessment, we have considered the ambition around the quantity of stakeholder engagement carried out, and how effective it has been in explaining the importance of DWMPs and helping companies to shape their plans.

- We note your approach to "Working with Others" to co-create your dDWMP in order to engage with a wide range of strategic partners and stakeholders. You state how stakeholder engagement has influenced your dDWMP and planning objectives. However, we note the feedback you have received on the difficulties communicating technical detail to your customers and so we would like to understand the measures you have taken to improve this ahead of your consultation and how effective your consultation has been.

<sup>13</sup> Defra, '[The government's strategic priorities for Ofwat](#)', March 2022

In our pre-consultation feedback, we recommended that companies considered following up with stakeholders to ensure they understood the information being presented to them, and that companies continued to engage effectively with stakeholders throughout the remainder of the planning process. You should consider the responses to your dDWMP consultation and explain how these have influenced your final DWMP.

## 6. Assurance and governance

As part of our assessment, we have considered whether there has been effective engagement with companies' Boards throughout the process and as part of their formal sign-off of the dDWMP. Also, whether there have been any audits (internal or external) of DWMP processes, modelling approaches or the data sets used.

- As set out in a joint letter to companies,<sup>14</sup> we requested an assurance statement from companies' Boards that the dDWMPs published for consultation followed the DWMP Guiding Principles,<sup>15</sup> and the DWMP technical framework (which amongst other things says that companies must take account of legal requirements) met all defined planning objectives, linked to partnership opportunities that will be put forward in PR24, addressed the storm overflow reduction plan, and gave best value options based on robust evidence. We note that you did not provide a full Board assurance statement for your DWMP, but you did provide statements of support from your Board confirming that the appropriate processes have been followed and that your plan sets out your proposed long-term investment needs. Your Board felt that it could not 'offer up' a best value plan in advance of the external consultation with your customers and partner organisations. It was also unclear whether you have undertaken additional assurance including independent / external reviews of your dDWMP submission or component parts. You should ensure that a full Board Assurance statement is provided as part of your final DWMP submission, and we would welcome confirmation of any additional assurance provided on your final plan.

We value ongoing dialogue with you to discuss this consultation response and the development of your final DWMP. A joint regulators' meeting has been offered during October 2022 to discuss the feedback you have been given. We would be happy to arrange further conversations with you between now and when final DWMPs are submitted via [dwmp@ofwat.gov.uk](mailto:dwmp@ofwat.gov.uk).

<sup>14</sup> Letter to companies from Defra, the Environment Agency and Ofwat, 'Expectations for assurance of cycle 1 draft and final drainage and wastewater management plans', February 2022.

<sup>15</sup> UK and Welsh Governments and the environmental and economic regulators (including Natural Resources Wales, Environment Agency and Ofwat), '[Guiding principles for drainage and wastewater management plans - GOV.UK \(www.gov.uk\)](#)', August 2022 Principle 5 Leadership.

**Yours sincerely**

**[REDACTED], Director, PR24 and Beyond**

ID 3018

REF: Ringmer 092022

## Response of Ringmer Parish Council to the Southern Water DWMP consultation September 2022

We would like to thank the members of your staff who recently attended a meeting with Ringmer Parish Council to discuss the unacceptable performance of the Ringmer (Neaves Lane) WWTW. Unfortunately, Ringmer Parish Council learned of your 12 week DWMP consultation only shortly before the consultation deadline, but we hope that our response below will nevertheless be taken into account.

### Ringmer Parish Council recognises:

- That where (as at Ringmer Neaves Lane) Southern Water WWTW accept rain water as well as foul sewage, there will inevitably be “storm overflows” in truly exceptional weather.
- That exceptional weather may become more frequent because of climate change.
- That these problems are historic in nature, in that much 20<sup>th</sup> century and earlier development was allowed to discharge both rain water and foul sewage into the same sewers.
- That while in most 21<sup>st</sup> century development rain water is separated from foul sewage and discharged separately via SUDS systems, it is extremely challenging, perhaps impossible, to retrofit such systems to existing high-density development. This is especially true where, as in Ringmer, the existing housing is largely built on impermeable gault clay.

### Ringmer Parish Council expects Southern Water to recognise:

- That the incidence of “storm overflows” at many of its Sussex WWTWs has been allowed to increase over the years to far higher levels than the incidence of weather that can reasonably be considered a storm.
- Despite significant investment at the Ringmer (Neaves Lane) WWTW in 2019, the 2021 data provided by SW to the Environment agency reported that there were 68 releases during the year, with an average duration such that this WWTW was discharging untreated sewage into our watercourses for more than 10% of the time.
- During 2021 the number of such discharges was far higher than the number of occasions on which Ringmer experienced anything that could reasonably be considered a storm. The reality is that “storm overflows” from Neaves Lane occur every time there is even moderate rain.
- It is of little benefit to make expensive investment in reducing phosphate discharges during the periods when the WWTW is working normally, if for over 10% of the time all the phosphate produced by a community of almost 5,000

people is being discharged without treatment.

- That if the EA permits “storm overflows” with such astonishing frequency, then that should be a cause of shame for the EA. This is certainly not the service that your Ringmer customers believed they were paying for through their substantial water bills, and it is not a level of service that they consider acceptable.
- That in the past SW has been guilty of perpetuating and exacerbating the problem by keeping secret the frequency and magnitude of these “storm overflows”, of which SW must surely have been aware, and by giving misleading advice to planning authorities about the consequences of additional development in the areas served by malfunctioning WWTW such as Neaves Lane. It appears that the decision to monitor and report publicly the extent of these “storm overflows” was made only in response to new central government requirements.
- That SW claims that the discharge of untreated sewage during “storm overflows” is immaterial because it is highly diluted, typically 95-97% rainwater, are as sensible as claims that beer can be considered non-alcoholic, because it is typically 95-97% water. This claim is especially misleading for those WWTW that most frequently suffer “storm overflows”, where the sewage content is likely to reach wine or even spirit levels.
- That while the Ringmer (Neaves Lane) WWTW is one of your poorer performers, there are at least a few others that are even worse!
- That in your current (AMP7) investment period, covering the period to 2025, there appear to be no plans for further investment at Neaves Lane to ameliorate the current situation.
- That your published objective of reducing storm overflows by 80% by 2030 will not be achieved without substantial investment during the forthcoming AMP8 investment period that runs to 2030, to which your recent consultation relates.

Ringmer Parish Council therefore makes the following comments for your consultation:

- You should have **consulted far more widely** about your future DWMP investment plans. This consultation should have included all Town and Parish Councils in your area. This would have improved the response rate, and brought this important project to the attention of a much wider audience.
- To achieve your stated target it is essential that there should be substantial investment before 2030 in reducing “storm overflows” from all those WWTW, including specifically the Ringmer (Neaves Lane) WWTW, that discharge untreated sewage other than in truly exceptional weather. Ringmer Parish Council is outraged by the table in your consultation papers that reports accurately the very poor performance of this WWTW but then assesses this as of “Low concern”. **We regard this as astonishing and completely unacceptable complacency.** No performance bonuses should be paid to any members of SW senior staff until this target has been met.
- **It is essential that in future SW is open and honest** about its performance with all its customers and with other authorities and partners. Ringmer Parish Council has

seen in 2022 an assurance from Southern Water to Lewes DC that there is “adequate headroom” at the Ringmer (Neaves Lane) WWTW to accept additional sewage from a proposed new Ringmer development. Questioning your staff at our recent meeting, it was established that this statement was based only on dry weather sewage flows to the WWTW. That crucial qualification does not appear in your comment, and was not understood by the planning officers that received it. As rainwater and foul sewage are separated in new development, the new development will not increase significantly the frequency of “storm overflows”, but it will increase the amount of pollution that is released at each event. This is a material planning consideration under both national and local planning policy and Southern Water should in future be open and honest about the consequences.

- There is a second, small, WWTW in our parish, the Ringmer (The Holdings) WWTW. This appears from the tables in the DWMP consultation papers to be operating perfectly, with no “storm overflows” at all. Most of the other very small WWTWs have similar perfect performance. This table should distinguish between those WWTW that are in fact operating perfectly, and those whose performance is unknown, because it is not currently being monitored.

ID 4046

REF: WinCC 050922



**Winchester**  
City Council

Southern Water Services Limited  
*DWMP Consultation* Southern House Yeoman Road Worthing  
West Sussex BN13 3NX

Contact: [REDACTED] Direct Line: [REDACTED]  
Email: [REDACTED]@winchester.gov.uk

5 September 2022 Dear Sir/Madam,

### **Southern Water – Drainage and Wastewater Management Plan**

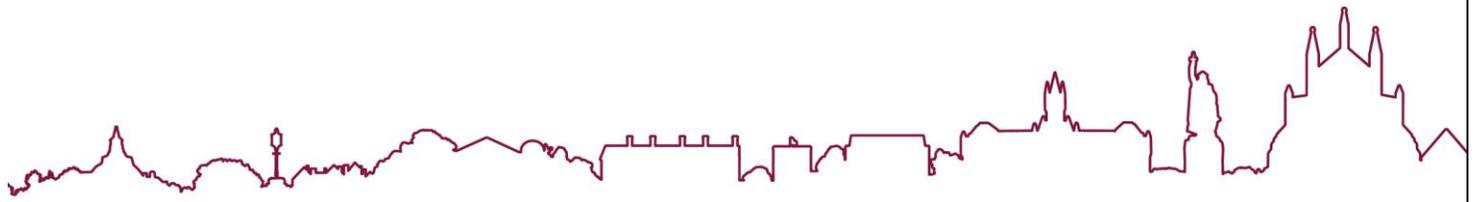
Thank you for your consultation regarding the above proposal.

As you will be aware the Council is a Member of the Partnership for Urban South Hampshire (PfSH), and there has been significant correspondence and political interest regarding the adequacy of the existing waste water treatment systems, and the impacts that this is having on the sensitive environment of the Solent, Itchen, and other water environments.

PfSH is responding to this consultation and the Council agrees with that response. As a member of PfSH, we look forward to working with you on this important strategic issue to ensure all parties are doing all they can to improve the situation and the working relationship with Southern Water.

In Winchester District, as well as this strategic scale issue, we have a number of totally unacceptable local issues which relate to the capacity of the existing wastewater treatment systems (for example, tankers that are on a daily basis removing sewerage from Sutton Scotney) which is having a significant impact on the lives of local communities. The Council needs assurance that issues like this will be prioritised in the emerging investment plan.

Southern Water also needs to set out a detailed and transparent programme and start entering into a much more proactive dialogue with City Council/Town/Parish Councils on when there will be planned investment to the existing waste water treatment facilities in the district in order to meet the Government's timetable of 2030. At the moment this dialogue is not happening.



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Given the ongoing issues regarding wastewater in Winchester and the political interest in this pressing issue, we would like to give you advance notice that Southern Water will be asked to attend a meeting in the coming months to discuss these concerns. Southern Water will be asked to outline how these issues being dealt with and what mechanisms they are intending to put in place to ensure that there is a much better engagement process on these important issues.

It is noted that the DWMP refers to population growth and additional homes being one of the significant challenges ahead. The Council will shortly be publishing a draft Local Plan for a 6-week public consultation (covering the period to 2039). The draft Local Plan including details of proposed location and phasing of individual site allocations to meet the development strategy. Southern Water will be formally consulted on the draft Local Plan and we look forward to receiving comments from you in terms how future growth will be managed and what future investment will be needed so that we can include this information in our Infrastructure Delivery Plan. One of the main areas of tension is that Local Plans look over a period of at least 15 years from the date of adoption, yet Southern Water only look over a much shorter time period. We believe that there also needs to be some flexibility built into the investment plan to deal with any unforeseen circumstances.

We look forward to hearing from you in terms of how we can work together in a much more of partnership way in order for us to do our part in helping to deliver the Government's 300,000 homes per year.

Yours faithfully,

██████████

Strategic Planning Manager Winchester City Council 01962 848353

Cc ██████████, Cabinet Member for Place and the Local Plan

ID 4058

REF: WSCC PM 250822

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## Southern Water-Draft Level 1 DWMP Consultation response

### 1. Introduction

The draft document, referred to as the Regional (Level 1) DWMP, is supported by five Investment Plans. Level 2 Planning and the strategic context for the 11 River Basin Catchments is set out. Proposed Level 3 Prioritised Investment Needs are presented for 61 catchments-out of a total of 381-considered by Southern Water in its first 5-year cycle for its region. DWMPs are expected eventually to extend up to a 25-year horizon.

Twelve significant challenges are set out, and the fourteen agreed Planning Objectives (POs), intended to address these challenges and issues, are also shown. Backed up by Risk Based Catchment Screening and a Baseline Risk and Vulnerability Assessment for each of the River Basins in Level 2 plus further technical notes including the ODA approach, this large amount of information, the challenges and issues (many interdependent), the range of Planning Objectives leading to the Prioritised Investment Needs options presented are complex-DWMP draft document page 15: "granular detail too much information for them (*focus groups*) to engage with". The document and the associated material reflect amount and depth of work carried out and thus reflects the extent of the task ahead. However it is not easily accessible or to understand-if the public are aware of it at all.

The on-line 'Have your say' consultation questionnaire and response form does not do any justice to the breadth and complexity of this material and does not allow for any depth of reply or comment.

The more detailed response below covers the Arun and Western Streams and the Adur and Ouse River Basins with their selected wastewater systems (10 and 4 respectively) and their associated Prioritised Investment Needs as of interest in West Sussex. These do not feature in SW's list of systems of the highest level of concern which is based only on the highest number of applicable planning objectives in Band 2 and does not necessarily include those systems with the most pressing and longstanding issues.

**This response is intended to provide a more detailed and constructive commentary to Southern Water than 'Have your say' responses are able to. It is hoped that this can contribute to the further development of the DWMP and formulation of the PR24 business plan for the AMP8 period and beyond in West Sussex.**

## 2. General

Clearly, the scope of work ahead for Southern Water and the other water companies now and over the foreseen 25-year horizon is immense. As this is to become statutory for the first time and with companies entering a whole new operating regime subject to an unaccustomed level of scrutiny, water companies should nevertheless be prepared to accept stretching and ambitious business plans in their negotiations with OFWAT and in their AMP8 undertakings.

The organisational effort, prioritisation and marshalling of limited financial, contractor, and human resources across the operating regions will be very demanding not only for the water companies and their contractors, but also for OFWAT, for the Environment Agency, and for the Lead Local Flood Authorities.

To ensure this can be successfully and consistently applied over the long term will require constant scrutiny. Major stakeholders and consumers will need convincing that the goals are achievable and be reassured that this effort will be applied not only now, but in the years to come with the inevitable turnover of personnel, with the increasingly pervasive effects of climate change and sea level rise, and as conditions and priorities change.

**In the immediate term it will not be sufficient only to reply to this consultation and thereafter leave matters to SW and OFWAT to agree the PR24 business plans and the ultimate form of the Level 3 DWMPs by 2024. The main stakeholders must be given the opportunity to remain involved in SW's detail business planning stage before any agreement with OFWAT on PR24 and AMP8, rather than being consulted after the scene is set.**

## 3. Discussion

### Regional (Level 1) Planning

SW's Guide to the Structure and Content of our DWMP: "Our draft Level 1 DWMP sets out our approach for how we will manage our drainage and wastewater services into the future, **as well as our needs-led long term investment plans that will secure the outcomes and resilience expected by our customers and the environment**"

This is further reflected in the DWMP Summary document: "**We aim to prevent our customers' homes and businesses from flooding while protecting our precious environment from pollution. These are the things our customers have told us are important to them**".

**These statements should be guiding principles.**

On Pages 10, 11, and 12 of the main DWMP document twelve significant challenges for SW and its partners are set out. The list may prove not to be exhaustive. **The consultation asks to consider the ranking of these challenges.**

This is not a satisfactory way to decide priorities: something will end up bottom while all are important and inter-related. Taking the two guiding principles above, the preference should be to look first to those that embody the concerns for the environment and of homeowners. These are: Nr 1 Climate Change, Nr 3 Tightening Environmental Permits, Nr 4 Nutrient Enrichment, Nr 10 Ageing Assets and Infrastructure.

Nr 2 Population Growth must be included as it translates into housing numbers and development planning. This is an important and high priority issue for local people. Existing sewer systems have been and still are regularly overwhelmed. Allowing for additional housing by continually making cumulative and piecemeal least-cost additions to the foul network cannot continue: a more radical and forward-looking approach to planning, financing, and implementing of waste infrastructure before future development takes place, will need to be adopted.

**Major housing growth requires wider system upgrades if future flooding within systems is to be reduced and ultimately eliminated. Up front funding of system upgrades will need to be addressed and can no longer be avoided.**

**If the automatic right for developers to connect-currently under review by Gov't- is to continue, then SW needs to be much more explicit as to the 'how' in its responses to major planning applications. Permitting incremental occupation of new developments in step with sewer improvements has too often been unsatisfactory. Adherence to and enforcement of conditions must be more rigorous during construction. If this right is curtailed, this will result in more onerous up-front demands on water companies and developers before waste connections are made.**

**The Technical Summary document for population growth and urban creep-see pdf attached for reference- is therefore highly relevant to the population growth challenge Nr 2 referred to above: consideration of the impact of development in each wastewater system as part of the Baseline Risk and Vulnerability Assessments (BRAVA) against the following planning objectives is imperative: (a) PO4: Risk of flooding due to a 1 in 50-year storm event  
(b) PO5: Storm overflow performance (c) PO7: Flood risk due to hydraulic overload.**

**Technical Summary Appendix B: Wastewater systems with future limited spare Dry Weather Flow capacity-in West Sussex these are Sidlesham, Lidsey, Loxwood, and South Ambersham. Although some may lie in the longer future, these must be addressed-not put off until faced with surcharges and overflows. See page 66 of the main document-modelling for future risks: example (b) sea level rise (Sidlesham WTW is an obvious candidate with future tide locking a pressing issue).**

**Wastewater Systems with the highest level of concern:** Figure 17 on page 67 of the main DWMP document makes no mention of the Arun and Western Streams or of the Adur and Ouse River Basins Catchments, nor of any of their wastewater systems. **Systems considered to be of a low level of concern, but with the highest number of risks which were taken through the ODA stage, must remain included and be properly addressed at the business planning stage and in the final DWMP for the two West Sussex River Basins. These must not be sacrificed in future budget setting.**

The wastewater systems considered in the two River Basin Catchments are:  
**Arun:** Ford, Horsham, Chichester, Sidlesham, Lidsey, Thornham, Pagham, Tangmere, Bosham, Lavant (10)  
**Adur:** Peacehaven Brighton, East Worthing, Newhaven East, Shoreham (4)

#### 4. Level 3 Prioritised Investment Needs for the Arun and Western Streams & Adur and Ouse Basins by Planning Objective-see two pdf attachments attached for ease of reference (AWS inv needs and AO inv needs)

The risks and challenges (page 22) and related Planning Objectives (Pages 23 to 63) are:

- Wastewater Compliance and Pollution PO2, 6, 8
- Sewer Condition and Groundwater Pollution PO3, 12
- Storm Overflows PO5
- Sewer Flooding PO1, 4, 7, 10
- Enhancing the Environment PO9, 11, 13, 14

##### **Detail:**

##### **PO6 and PO8 Wastewater treatment compliance and Pollution:**

PO6-Arun **why are Sidlesham WTW and Pagham WTW not included?**

PO6 Adur **none included: are we sure?**

PO8 Arun **Sidlesham WTW should be in Band 2 for short term**

**Pagham WTW should be in Band 2 and short term as both discharging into Pagham Hrbr; medium term is too long to wait as Harbour is deteriorating**

PO8 Adur **no WTWs in the Peacehaven Brighton catchment included-OK?**

##### **PO2 Risk of Pollution:**

Arun **included in several systems-any missing?**

Adur **only at Newhaven East WTW and Lewes WPS-nowhere else?**

##### **PO3 and PO12 Sewer Condition and Groundwater Pollution**

PO3-Arun **Sidlesham-Itchenor: sewer survey in Itchenor is listed but why is Birdham not shown for integrity checks?**

**- Electroscan surveys were carried out in Itchenor and Birdham Feb 2022: Results? actions in AMP7?**

PO3- Adur **only at Newhaven East Lewes Southover -sewer surveys:**

PO12- Arun **pipe rehabilitation/CCTV surveys-Bosham and Tangmere shown-nowhere else in Arun River Basin? Itchenor.Birdham?**

PO12- Adur **all four catchments are included**

##### **PO5 Storm Overflow Risks**

Arun **most WTWs or CSOs are included**

Adur **Peacehaven Brighton not included-should it be?**

**See also pages 38, 39, and 40 of main DWMP document for new statutory duties and for three DEFRA Storm Overflow reduction scenarios. The Storm Overflows Task Force will be reporting in Summer 2022 so the DWMP will need to be updated before the final publication in March 2023.**

**Options arising from the Sidlesham DAP should be included -see section 5 below**

**PO1, PO4, PO7, PO10 Sewer**

**Flooding**

**PO1 Risk of Internal Sewer Flooding**

- PO1- Arun locations in Ford, Thornham and Chichester catchments included for jetting/maintenance/education; **any other locations omitted?**
- PO1- Adur East Worthing-catchment wide-maintenance, education Peacehaven Brighton-three roads-education, jetting **anywhere in Newhaven East/Shoreham catchments?**
- PO4, PO7 Risk of Flooding in a Storm**
- PO4- Arun risk of sewer flooding 1/50 storm -several locations Chichester and Ford; **growth related: no investment in Tangmere/Bosham/Thornham/Manhood Peninsula?**
- PO4- Adur several locations in East Worthing; **growth elsewhere not considered?**
- PO4&7- Arun several locations: modelling and flow surveys in short term: **can this be initiated in AMP 7 thus expediting and preventing pressing improvements sliding into AMP 9. Can there not be any investment?**
- Adur modelling and flow surveys in locations in all four catchments: **sufficient?**

**P10 Surface water management**

- Arun included in the Horsham and Ford PO4/7 catchment wide
- Adur included in all four catchments with PO4/7-modelling and flow surveys

**PO9, 11, 13, 14 Enhancing the Environment**

- PO11-Arun 8 locations-**develop nutrient budgets** to understand risks and sources impacting Habitat sites (in line OT01.4 Sidlesham/Pagham Harbour **add: Solent and Dorset Coast-** same as Lidsey and Tangmere)
- PO11-Adur no applicable coastal sites or harbours with Habitat sites shown-
- PO13-Arun- Improving bathing water-reduce spills from seven CSOs in Ford catchment
- PO13-Adur ditto - reduce spills from two CSOs-Marine Drive Brighton in Peacehaven catchment and East Worthing WTW CSO.
- PO14-Arun protecting shellfish waters-Chichester WTW CSO-reduce spills
- PO14-Adur no shellfish waters-no measures referred to

**Discharge reduction and prevention into rivers and tributaries upstream e.g. Arun, Adur, and Ouse must be clearly included.**

**5. Sidlesham Drainage Area Plan (DAP)-2017 (pdf attached)**

Page 45 of the main DWMP document includes a section on Drainage Area Plans (DAPs): SW developed Drainage Area Plans (DAPs) for 103 of its wastewater systems: this includes the Sidlesham catchment. Its DAP (page 4) says: "SW prioritises the production of DAPs with the highest priority being those catchments with existing issues such as sewer flooding and where there are proposals for future development which may impact on the performance of the sewerage system. **Sidlesham was selected as a priority DAP for these reasons**". This system is the fourth largest by population out of 60 in the Arun and Western Streams Basin.

The DAPs identified options to reduce flood risks to properties on its DG5 flood register. SW states: "This has put us in a good position in terms of knowing the location and preferred options for many internal flooding problems across our

operating region. “We have imported these options, where they are yet to be funded and delivered, into our DWMP.” The DAPs were developed for specific properties or clusters of properties that have been flooded once or several times”.

SW’s 2017 DAP Summary draft for the Sidlesham catchment on page 18 Figure 5, and Page 19 Table 6 shows **DG5 flooding clusters on the Manhood Peninsula**. These and associated proposed improvement options have been known about for years and **most are still outstanding**. See summary of needs Table 8 page 26, and Flooding and Growth Options: Sections 10.4, 10.5, 10.6, 10.7, 10.8, 10.9 on pages 32 to 37. Also pages 43, 44 and 45 referring to 2040 Catchment wide conveyance option: **most developments shown for 2040 were already built by 2020**.

These flooding clusters are located around the waste pumping stations at the Memorial Hall in Itchenor, in Birdham at Pinks Lane, in West Wittering, in East Wittering, at the WPS in East Drive in Bracklesham, and at the WPS in Almodington.

The clusters in Selsey on page 18 in the DAP and options shown have been largely dealt with for now. With future development and in view of the “Hold the line” coastal policy envisaged by CDC and the Southern RFCC, this will need to be revisited-DAP Section 10.3 and options pages 28 to 31, including East Beach CSO-tide locking?

At times of rainfall (more frequent than 1 in 50 event) flooding of homes and backflow from drains has been experienced for years. Tankers are routinely used to deal with the overwhelmed network and pumping stations at Itchenor (Shipton Green), West Wittering (Pound/Beach Road), Pinks Lane in

Birdham, East Wittering (Church Road), in Highleigh Road in Sidlesham, and at the Clappers Lane WPS in Earnley.

Flooding events at the East Drive WPS in Bracklesham have necessitated the closure of the Caravan and Boat Club site for cleaning up. The large Holdens static caravan park at Bracklesham Lane has suffered sewage backing up from the Clappers Lane/Bracklesham Lane sewer.

Relief pumping by tanker over several years at the Pinks Lane WPS cluster in Birdham is now so frequent that earlier this year a permanent 20 x 4 metre hard pad for tanker parking was laid. While this deals with flooding symptoms experienced by residents, this doesn’t suggest early resolution of the underlying causes. **See image attached**.

**Options to deal with these issues were developed years ago and are reflected in the Sidlesham DAP. Given this prominence, it is of concern not to see more specific mention and urgency of growth-related actions for this catchment’s infrastructure - Clappers Lane (Earnley), Shipton Green (Itchenor), Pinks Lane (Birdham), East Drive (Bracklesham), and Almodington. Needless delay will result if the entry in the Prioritised Investment Needs as shown at the bottom of page 11 (AWS investment needs pdf) is adopted: any action will move into AMP 9- (Sidlesham-PO4/PO7-Study, model improvements, including flow surveys for storm and dry weather flow, and model calibration).**

Meanwhile the threat of flooding remains and tankering will continue with house values blighted. Network upgrades proposed in the Sidlesham DAP have not materialised and in places residents experience the consequences. **Can actions not be initiated in the current AMP7?**

**Electroscan surveys** of the main sewers were carried out in **Itchenor and in Birdham** in February 2022 over 11.8 kms - will this lead to any local sewer remediation in AMP7? This does not cover lateral connections nor other infiltration sources. Itchenor is listed against PO3 for the Sidlesham catchment, but there is no reference to integrity/infiltration checks at Birdham-see reference to Pinks Lane WPS above which receives all flows from Itchenor and Birdham before onward transport to the Almodington WPS.

[REDACTED]

[REDACTED]

August

2022 Birdham, Itchenor, West Wittering, East Wittering,  
Bracklesham, Earnley, Sidlesham

Attachments:

- Technical Summary document for Population Growth and Urban Creep pdf
- Arun and Western Streams Basin Prioritised Investment Needs pdf
- Adur and Ouse Basin Prioritised Investment Needs pdf
- Sidlesham Drainage Area Plan Summary Report 2017 pdf
- Pinks Lane tanker parking pad jpg