Water Resources Management Plan 2024

Statement of Response

Annex 2: Our responses to questionnaire feedback and group action

May 2025

from Southern Water

Contents

List of Tables

List of Figures

Glossary

Acronym	Term	Definition
AMP	Asset Management Plan	Water company business plan over a 5-year period.
AMR	Automatic Meter Reading	Type of water meter that can be read remotely using drive-by technology.
ASR	Aquifer storage and recovery	A way of increasing the amount of water available by increasing the recharge of groundwater storage during wet periods so the water can be used sustainably in drier periods.
BVP	Best Value Plan	A Water Resources Management Plan which as part of its development considers a range of factors (alongside economic cost) with the aim of increasing the overall benefit to customers, the wider environment and overall society.
	Catchment	The area from which precipitation (rainfall) and groundwater would naturally collect and contribute to the flow of a river.
	Central area	Supply area comprising the Sussex North, Sussex Brighton and Sussex Worthing water resource zones.
Defra	Department of Environment, Food & Rural Affairs	The Government department responsible for setting both water and environmental policy.
DO	Deployable Output	The output of a source or bulk supply as constrained by licence (if applicable); pumping plant and / or well / aquifer properties; raw water mains and / or aqueducts; transfer and / or output main; treatment; water quality.
	Drought Permit	A statutory authorisation granted by the Environment Agency under drought conditions, which allows for abstraction/impoundment outside the normal conditions/schedule of existing licences on a temporary basis.
	Drought Order	A statutory authorisation granted by the Secretary of State during drought to modify abstraction / discharge arrangements, augment, use or to set other requirements on a temporary basis.
DWI	Drinking Water Inspectorate	The government's drinking water quality regulator.
	Eastern area	Supply area comprising the Kent Thanet, Kent Medway East, Kent Medway West and Sussex Hastings water resource zones.
dWRMP	Draft Water Resources Management Plan	
EA	Environment Agency	The government's environmental and water resources regulator
	Environmental Destination or Environmental Ambition	A strategy developed at a regional level to help enhance the natural environment through reduction to water resources activities and by sustainable abstraction.
ERP	Emerging Regional Plan	The draft least cost regional plan prepared by Water Resources South East under the National Framework as was consulted upon in January 2022.
fdWRMP	Final draft Water Resources Management Plan	
HRA	Habitat Regulations Assessment	Assessment to consider potential for significant effects (if any) of options and strategies on designated European sites
HWTWRP	Hampshire Water Transfer and Water Recycling Project	A Strategic Resource Option with two component parts including a water recycling plant that transfers to Portsmouth Water's consented Havant Thicket Reservoir for storage and a transfer pipeline from the reservoir to Itchen Surface Water WSW, being progressed as a collaboration between Southern Water and Portsmouth Water.
MAR	Managed aquifer recharge	A controlled way of increasing the amount of water in groundwater.
Ml/d	Mega litres per day	Millions of litres per day.
	National Framework	The Environment Agency's national framework for managing future water need for England by the means of regional planning introduced in March 2020.

Acronym	Term	Definition
NE	Natural England	The government's adviser for the natural environment in England.
Ofwat	Office of Water Services	The economic regulator of the water sector in England and Wales.
	Outage	Temporary loss of Deployable Output.
PCC	Per Capita Consumption	Average volume of water consumed by person in a household, generally expressed in litres per person per day (l/p/d) or litres per head per day (l/h/d)
PWC	Portsmouth Water Company	
RAPID	Regulators' Alliance for Progressing Infrastructure Development	The collaborative regulatory group of Ofwat, the Environment Agency and Drinking Water Inspectorate formed to accelerate development of new water infrastructure and design future regulatory frameworks.
RBVP	Regional Best Value Plan	The Best Value Plan for the region prepared by Water Resources South East - as consulted on in Autumn 2022.
	Source	A named input to a water resource zone where water is abstracted from a well, spring or borehole, or from a river or reservoir.
	Section 20 Agreement	The agreement signed by Southern Water and the Environment Agency during the Western Inquiry pursuant to Section 20 Water Resources Act 1991 (March 2018-2030) recognising the need to rely on drought permits and drought orders until long term infrastructure is in place to secure supply in Hampshire.
rdWRMP	Revised draft water resources management plan	
SRO	Strategic Resource Option	The large schemes intending to provide resilience future water supply determined as Strategic Resource Options by RAPID and being investigated through RAPID's gated process.
SEA	Strategic Environmental Assessment	Assessment to identify and assess any significant environmental effects of the Water Resources Management Plan.
SEMD	Security and Emergency Measures Directive	
SES	SES Water	
SESRO	South East Strategic Reservoir Option	A reservoir proposed for development in South East of England that could benefit customers of Affinity Water, Southern Water and Thames Water
SEW	South East Water	
	Sustainability Reduction	Reductions in Deployable Output required to meet statutory requirements and / or environmental expectation or to reach any regional Environmental Destination
SWS	Southern Water Services	The registered name for Southern Water
T2ST	Thames to Southern Transfer	An SRO enabling water from the South East Strategic Reservoir (a reservoir SRO) and/or the Severn to Thames Transfer (a transfer SRO) in Thames Water's Swindon and Oxfordshire water resource zone to be transferred to Southern Water's Western area, being progressed as a collaboration between Southern Water and Thames Water.
TUB	Temporary Use Ban	A drought restriction imposed by water companies on customers. Restrictions include not using water supply for leisure pursuits such as watering a 'garden' using a hosepipe, filling a pool, washing a car, among others.
TWUL	Thames Water Utilities Ltd	The registered name for Thames Water.
UKCP18	United Kingdom Climate projections 2018	
	Western area	Supply area comprising the Isle of Wight, Hampshire Andover, Hampshire Kingsclere, Hampshire Rural, Hampshire Southampton East, Hampshire Southampton West and Hampshire Winchester water resource zones.
	Western area Inquiry	A public inquiry into proposed changes to Lower Itchen, Test and Candover abstraction licences in Hampshire, held in March 2018.
WFD	Water Framework Directive	European Union Environmental Legislation (transposed and retained into English law) committing to achieving good quality and good quantitative status of all water bodies.
WINEP	Water Industry National	A list of environment improvement schemes that ensure water companies meet

Acronym	Term	Definition
	Environment Programme	European and national targets related to water.
WRMP	Water Resources Management Plan	Statutory plan produced by water companies every five years to plan to meet supplies over a minimum 25 year period.
WRP	Water recycling plant	A plant using advanced treatment techniques to convert treated wastewater into highly purified source water. Special membranes are used to remove salts and a range of other impurities.
WRPG	Water Resources Planning Guideline	The Water Resources Planning Guideline prepared by the Environment Agency, Ofwat and Natural Resources Wales.
WRSE	Water Resources South East	Partnership of water companies and regulators in South East England working together to make best use of available water resources.
WRZ	Water Resource Zone	The largest possible zone in which all resources, including external transfers, can be shared and hence the zones in which all customers experience the same risk of supply failure from a resource shortfall.
WSW	Water Supply Works	
WTW	Wastewater Treatment Works	

1 Introduction

We consulted on our revised draft Water Resources Management Plan 2024 (rdWRMP24) from 11 September 2024 to 4 December 2024. The consultation resulted in 1,176 representations. In order to respond to the feedback, we have divided it into the following categories and produced a separate document for each category as follows.

1. Feedback submitted via online questionnaire and as a result of a group action (Annex 2)
2. Feedback from members of the public (Annex 3)
3. Feedback from our regulators and other organisations (Annex 4)

This annex covers the feedback provided through the online questionnaire and as a result of a group action. We have taken account of the feedback in publishing our final draft Water Resources Management Plan 2024 (fdWRMP24).

2 Feedback through online questionnaire

Completing an online questionnaire was one of the ways for our customers and stakeholders to provide feedback on our rdWRMP24. The questionnaire consisted of 10 questions as shown in Table 1. Respondents were invited to provide additional comments as part of question 10.

Table 1: Questions included the questionnaire on our consultation website.

Question No.	Key actions
1	Our plan includes options to increase supply (e.g. building new reservoirs) as well as options to reduce demand (e.g. by reducing leaks and encouraging customers to use less water). Do you agree we have struck the right balance between supply and demand measures?
2	Our plan includes development of new storage options, such as the River Adur Offline Reservoir. Do you support more storage options to provide resilience to droughts?
3	To help protect the environment, our plan sets out how we intend to progressively reduce the volumes of water we take from the environment. Do you agree with our plans to reduce the amount of water we take from the environment by 2050?
4	Developing new, more sustainable and resilient sources of supply has a financial cost. Do you think we have struck the right balance between cost, resilience and protecting the environment in our plan?
5	Droughts and water scarcity are forecast to become more frequent and severe. Would you support more frequent restrictions, such as temporary use bans and non-essential use bans, on customers' use to improve resilience and reduce the amount of water we take from the environment during droughts?
6	By 2050, the government requires water companies to reduce the amount of water each person uses daily. Currently, each person uses an average of 128 litres per day. Do you support our target of an average of 110 litres per person per day in a dry year, by 2045, five years earlier than the Government requirement?
7	In order to meet demand for water in the Hampshire area, we may sometimes have to apply for drought permits/orders to abstract from the River Test during droughts. In order to protect the River Test do you support temporarily importing water from Norway via sea tankers first over the use and reliance on drought orders and permits, which may still be needed?
8	Our plan includes desalination. Do you support the use of desalination for public supply to improve resilience to droughts and reduce the amount of water we take from the environment?
9	Our plan includes schemes involving recycling of water. Do you support the use of recycled water for public supply to improve resilience to droughts and reduce the amount of water we take from the environment?
10	Do you have any other comments on our plan?

A total of 99 responses were received via online questionnaire. Of these, 16 were on behalf of organisations while the remaining were from individuals.

2.1 Analysis of feedback

This section provides a summary of the feedback received through the questionnaire. We have also provided responses to all additional comments that were submitted with the questionnaire.

We have reproduced the feedback as received, including any spelling or grammatical errors. We have however removed the names of the respondents as well as any titles that could be used to identify them. We have also redacted use of site names that could potentially be non-compliant with the Security and Emergency Measures Direction 2022 (SEMD).

2.1.1 Question 1: The balance between supply-side and demand-side options

In order to maintain uninterrupted supply of water to a growing population well into the future in all but the most extreme weather conditions, we are planning to reduce demand as well as increase supplies.

The Government requires leakage to be reduced by 50% and average Per Capita Consumption (PCC) to 110 litres per person per day (under dry year conditions) by 2050. We are aiming to exceed these targets by reducing leakage by 53% by 2050 and achieving the required PCC level by 2045.

In addition, we are planning to build a number of infrastructure schemes to increase supplies. These include five water recycling options in the 10 year period between 2025 and 2035 with a combined capacity of over 100 million litres per day (Ml/d). These options will be at Littlehampton (Central area), Sandown (Western area), Portsmouth Harbour (Western area), Sittingbourne (Eastern area) and Medway (Eastern area). The water recycling plant at Portsmouth Harbour will be completed by 2034; the remaining will be delivered by 2030. A number of groundwater schemes are also planned for delivery by 2030 as well as improvements to our network that will allow us to move water more easily within the company.

As part of Question 1, we asked whether we have struck the right balance between supply and demand options. The responses are summarised in Figure 1, which shows that 45% of the respondents did not think we had struck the right balance while 40% thought we had. The remaining either did not provide a response or were unsure.

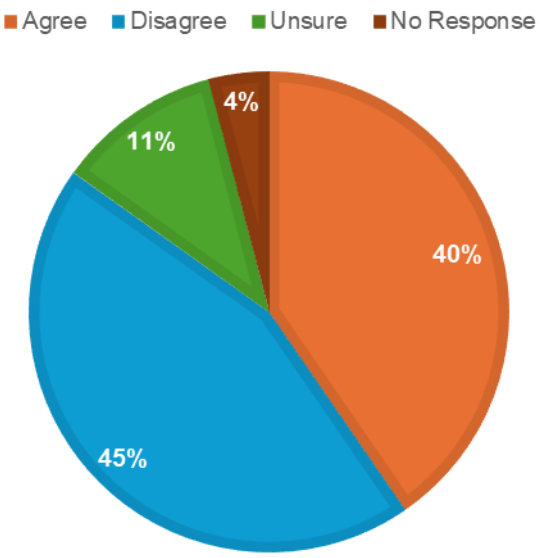

Figure 1: Breakdown of responses to question 1.

A number of respondents provided additional comments when answering the questions. The comments and our responses to them are provided in Table 2.

Table 2: Additional comments on question 1 and our responses.

Reference	Comment	Southern Water response
WRMPSV43	Southern Water is being reasonably ambitious in its plans for leakage and per capita demand reduction, so the balance is probably right.	We thank Steventon Parish Council for the feedback and are happy to note that the balance is considered to be right.
WRMPSV44	Or rather it is very unclear whether SW has achieved this from the consultation materials, but it appears not to be the situation. Some materials are missing (Annex 12, 13, 17 and likely many other documents) which may be very pertinent if a respondent is expected to make any informed judgement on the subject matters and sound comment or responses in return. Putting them under restricted supervised access on grounds of national security tells us a lot about SW's (and perhaps Defra's) lack of openness, honesty and integrity and we therefore look to this regulator who surely must have sanctioned this to explain why such restriction had been allowed. Regarding leaks, a lot more effort needs to be expended eliminating leaks and achieving an earlier deadline than is currently proposed of 53% reduction by 2050. This should be a lead strategy in the plan and especially when, as reported by Macquarie Southern Water's major shareholder and undoubtedly now the controlling and influencing entity, that SW leaks 19% of its total supply on the customer side (stated also by Gov.uk who add that a further 3.2% is additionally lost between raw source and SW treatment plants). But it is not really on 'customer' side of the process as seems implied by Macquarie's statement, but is in fact from the supply network before reaching customers, except of course for maybe those customers they don't know anything about because of lack of metering. Given Southern Water's well documented poor track record as again seems to be suggested by The Guardian article of 26th October 2024 concerning "no flows" on scheduled dates for FE testing and taking advantage of Defra's and EA's dubious practice in allowing this to be recorded as a 'pass result', and also the WASP (Windrush Against Sewage Pollution) lobby group blogs which invariably implicate SW in whatever they report, it is not unreasonable to assume it is possibly far greater than the stated 19% leak loss rate. But in view of this significant wastage how about changing the plan to 53% reduction in leaks by 2035, a 75% reduction by 2045 and maybe 95% reduction by 2050. If SW can so confidently and dubiously state they will finish Havant Thicket Reservoir and complete the build of a fully operational recycling plant, and also the 42 km pipeline to [redacted] treatment works by 2034, then what could SW achieve if they seriously applied their energies to eliminating leaks. Maybe by just stepping up the pace must surely deliver significant meaningful result. By 2035 SW say they estimate wastewater recycling would generate up to 127 million litres day, emphasis on only up to. But leaks currently as stated of 19% of total supply equates to 107.35 million litres per day (at least) being lost through leakage. So fixing leaks to eliminate wastage should, surely, be a more logical lead priority ahead of recycling using the proposed technologies. More effort also is indeed needed by government and SW to get consumers	We thank you for taking the time to review our plan and provide feedback. The consultation is aimed at soliciting feedback from our customers, regulators and wider stakeholders on our plan so that it can be taken into account when we are finalising it. We did not publish some of the documents online. These documents were listed in the statement of exclusions on our website (03-wrmp-consultation-statement-of-exclusion_2024). They were however available to view at our Durrington office. The reason we did not publish was to comply with the Security and Emergency Measures Direction 2022 (SEMD). We have published all documents related to our fdWRMP24 except Annex 1 (Problem Characterisation). This publication of this document is withheld in order to comply with SEMD. This document is however available to view at our Durrington office. The leakage reduction target set by the Government is 50% by 2050. Our planned reduction of 53% by 2050 exceeds the target set by the Government. We will be replacing all our existing meters with smart meters between 2025 and 2030. This will allow early detection of any leaks on customers premises and which can then be fixed much quicker. Some loss of water during treatment is inevitable. We presume that FE here refers to testing of final effluent before it is discharged from our wastewater treatment sites. We refer you to our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)) for details on the measures we are taking to improve our wastewater performance. Our leakage target is based on savings that can be realistically achieved with existing technologies. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward. We will need supplies for all schemes included in our plan along with leakage reduction to ensure that we can maintain uninterrupted supplies to our customers in all but the most extreme weather conditions. As part of our demand management plan, we will be engaging with non-household customers to explore ways in which we can help them reduce their consumption. We aim to reduce non-household consumption by 9% by 2038.

Reference	Comment	Southern Water response
	(private and industrial) to use less quality drinking water and to imposing compulsory meters to achieve 100% by latest 2030…and certainly not as planned 2045. This respondent is also not convinced from reading the material that industrial users have been adequately examined where their processes involve own (or potential own) purification methods, or maybe involves a fundamental chemical change product and/or requires a lesser supply quality than highly purified drinking water and, possibly, even where smaller recycling plants would be more appropriate as part of their own operational process. This needs further examination.	
WRMPSV46	We understand the pressing need to ensure water security in the face of increasing challenges, such as climate change, population growth, and droughts. We strongly support Southern Water's efforts to reduce leakage within the water supply system and continue to welcome Southern Waters ambition to half the number of leakages by 53% by 2050. We highlighted in our February 2023 response that Smart Metres are showing that leakage from supply pipes within homes and commercial buildings represent up to a third of all leakages. We urged Southern Water to look at more ways to support customers in finding and stopping these leaks. We continue to advocate this water saving intervention.	We thank the RSPB for taking the time to review our plan and provide feedback. We are pleased to note that it is supportive of our plan. Smart metering underpins our demand management programme. We are planning to replace all our existing meters with smart meters by 2030. This will help us proactively engage with our customers to promote water efficiency. It will allow early detection of any leaks on our customers' premises.
WRMPSV47	It appears to us that Southern Water is being reasonably ambitious in its plans for leakage and per capita demand reduction, and we therefore think the balance is probably right.	We thank Garford Parish Meeting for taking the time to review our plan and provide feedback. We are pleased to note that it is supportive of our plan.
WRMPSV56	Vale of White Horse District Council would like to see greater emphasis given to the efficient use of water and the minimisation of wastage. While the council recognises that water efficiency forms a significant part of the draft Water Resources Management Plan (WRMP) up to 2040, we are concerned that from that date forward Southern Water seems to rely more on proposed new sources of supply (including the Thames to Southern Transfer Project) rather than continuing to heavily focus on addressing leakages and waste. Our council would, therefore, request that Southern Water considers introducing more ambitious targets for leakages, reducing average daily water use and non-household water use. Our council would question the basis for the WRMP's conclusion that by 2075, Southern Water will need to find an additional 587 million litres of drinking water per day. As Southern is already supply 565 million litres of drinking water a day, this seems a very high expected additional need. We are, therefore, requesting that: • a further sense check is undertaken on the assumed future needs that underly many of the proposals within the WRMP, and • a greater emphasis is placed on demand management within the WRMP. Our council has also noted that under the worst-case scenario outlined on pages 18 and 19 of the WRMP the combined figure for the additional litres of drinking water needed per day in 2075 due to the effects of a growing population and the impact of climate change is 330	We thank South Oxfordshire and Vale of White Horse District Council for taking the time to review our plan and provide feedback. We have adopted a twin-track approach in planning for the future. This means developing supply-side schemes alongside delivering our ambitious demand management plan. We need to develop supply-side schemes as we cannot meet future supply-demand balance challenges by relying on demand management alone. Despite aiming to exceed the targets set by the Government on reducing leakage and consumption, we are committed to exploring options that will deliver either greater benefits and/or deliver them earlier. This includes exploring options that may not be in our current plan. The need for additional water in the future in our plan is not driven by increase in demand only. It's also driven by considering the impacts of climate change on our existing supplies and the need for us to reduce the amount of water we are currently taking from rivers and groundwater in order to protect and enhance the environment. • As part of our next plan (WRMP29), we will be reassessing all of the factors that influence future supply-demand balance scenarios. • We have an ambitious demand management plan, but we will continue to explore opportunities to go further where feasible.

Reference	Comment	Southern Water response
	million – a long-way short of the additional 587 million litres of drinking water per day that Southern Water says it needs to find. Consequently, we are concerned that Southern Water, in an effort to lessen the ecological impact that it has on catchments within its own area, are planning for unnecessary solutions (such as the Thames to Southern Transfer Project) that will have negative environmental effects on catchments within neighbouring regions. Vale of White Horse District Council has long-standing concerns regarding the use of new strategic reservoirs for meeting water needs. These projects damage the environment, significantly increase carbon emissions, reshape the natural landscape and disrupt local communities. We, therefore, do not see them as an effective way of ensuring future water resilience. Our preference would always be for an intensified focus on demand management including water efficiency (through the tackling of leaks and changes in consumer behaviour) and the increased use of nature-based catchment schemes which help to ensure that more water is retained. Vale of White Horse District Council would like to specifically caution against any assumptions regarding the Thames to Southern Transfer Project due to its dependency on the development and delivery of the South East Strategic Reservoir Option (SESRO) at Abingdon. While HM Government has recently made announcements regarding the SESRO, it still has to go through the Nationally Significant Infrastructure Project (NSIP)/Development Consent Order (DCO) process. As the future of the proposed reservoir remains uncertain, the council would, therefore, suggest that Southern Water considers alternative options. Our council also wishes to make clear its opposition to the other major feature of the Thames to Southern Water Transfer Project, the proposed routing of water pipelines across/through the North Wessex Downs National Landscape – the negative/adverse impacts of which cannot be justified. We would request that Southern Water gives greater emphasis in its WRMP to securing water supplies from within its own region. Transfers from outside should surely be a last resort, once other potential sustainable local solutions (reducing leakages, water recycling, desalination, introducing nature-based catchment schemes) have been exhausted.	As mentioned above, the need for additional water in the future is based on increase in demand due to growth as well as the impact of climate and reductions we need to make from our current sources to protect and enhance the environment. There is no attempt on our behalf to misrepresent the figure for future water needs in order to promote a particular scheme. The concerns of the Council on reservoirs are noted. Thames to Southern Transfer (T2ST) is part of our plan. SESRO is the most obvious source to feed this transfer but technically speaking there is no direct one-to-one relationship between T2ST and SESRO. T2ST can be supported by other options as well. The concerns of the Council on T2ST are noted. As part of scheme development, we will be conducting detailed Environmental Impact Assessments and hold public consultations at various stages. The concept of regional planning was introduced to encourage integrated planning across a wider region, regardless of water company boundaries, so as to deliver overall benefit to the region as a whole. We have worked with other member companies of the Water Resources South East (WRSE) to deliver a resilient water supply solution for south east England as a whole.
WRMPSV57	Sussex Wildlife Trust recognises that there are considerable challenges in maintaining an adequate water supply for a growing population in an area of high environmental sensitivity, which is already experiencing serious water stress. Whilst reducing demand should be prioritised as the long-term solution to the sustainable development of water resources in the South East, we acknowledge there will still be a need for new schemes to meet the supply shortfall. Sussex Wildlife Trust supports the use of supply side options that are the least environmentally harmful and ideally, where benefits to the environment can be delivered. A significant step-change in ambition and delivery is needed if we are to see England's rivers, lakes, estuaries and coasts returned to good ecological health by 2027, 30% of land and sea protected for nature's recovery and the decline of species halted by 2030. The ambition of	We thank Sussex Wildlife Trust for taking the time to review our plan and provide feedback. We agree with the Trust's view about a step change in ambition and delivery to deliver a plan that meets the needs of the environment as well as our customers. Our 2025-30 plan includes more investment than any of our previous plans over the 5-year planning period. Our demand management plan is already ambitious. However, we are committed to exploring options that will deliver either greater benefits and/or deliver them earlier. This includes exploring options that may not be in our current plan.

Reference	Comment	Southern Water response
	water company plans up to 2030 will play a central role in the achievement, or failure, of these Government targets for nature recovery. Overall, we would like to see even more ambition on the demand measures side.	
WRMPSV59	We consider that the measures to reduce demand should be much more ambitious. We understand that a recent Environment Agency (EA) report stated that in England an average of 19% of water is lost through leaks. That is nearly a fifth! That is presumably water that has undergone treatment and has been paid for by customers. The target to reduce leaks by 53%, a little over half, by 2050 seems inadequate. We understand that in Paris leaks were reduced from 20% to 5% in just ten years. We would like to see a similar level of ambition in SW's plans. An ambitious target of leak reduction and mains replacement is urgently needed. In the consultation document the paragraph on the disadvantages of reduction of leaks cites the costs and the disruption to local communities. It is clear that all of the proposals in this document will include some level of disruption, especially the miles of pipelines that are proposed, and schemes such as effluent recycling are likely to cost well over a £billion. All proposals will involve some disruption and some expense. These are unavoidable. What has to be found is the most sustainable option, the one that delivers the water we need and provides the best balance between the demands of climate change mitigation and adaptation, supporting nature and the cost to consumers. We consider tackling water leakage more proactively is a better approach. We do wonder if the greater profit that new infrastructure would bring to shareholders than the lower profits from repairing leaks could be one reason for this lack of ambition.	We thank the Chichester and Arun Green Party for taking the time to review our plan and provide feedback. Our plan to reduce leakage by 53% exceeds the 50% leakage reduction target set by the Government. Our leakage target is based on savings that can realistically be achieved with existing technologies. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward. Leakage reduction is one of our performance indicators with financial penalties attached to non-delivery. Apart from being the right thing to do, reducing leakage has financial incentives attached to it.
WRMPSV61	Demand - The success of the demand management initiatives outlined in the draft WRMP of course depends on behavioural change of local residents and businesses in relation to water usage. Targets need to be realistic and should be supported by robust evidence, as there is a clear challenge and deliverability risk in aiming for higher targets than those required by regulatory guidance. In terms of water efficiency, we note that the draft SWRMP24 includes interventions to achieve a Per Capita Consumption (PCC) of 110l/h/d by 2044-45; 5 years ahead of the target date in the National Framework and Southern Water is aiming to reduce non-household consumption by 9% by 2037-38 compared to 2019-20 and leakage by 53% by 2049-50 compared to 2017-18. As part of WDCs emerging Local Plan (published at the Regulation 18 stage, March 2024 the Council's draft planning policy on this issue (CC6: Water Efficiency) would ensure all new residential developments are designed to achieve a maximum use of 110 litres per person, per day. For non-residential development, all proposals should maximise water efficiencies under the mandatory water credit category in the BREEAM Water consumption assessment methodology. These ambitions will be tested as part of the production of the Local Plan, through evidence base collation and consultation. WDC has supported the draft South East	We thank Wealden District Council for taking the time to review our plan and provide feedback. We agree that the success of our demand management plan depends, in large measure, to behaviour change. That is why we have included initiatives that in our view will help us bring about the required change. We are however not underestimating the scale of the challenge in this regard. We advocate setting a Per Capita Consumption (PCC) target of 85 litres per person per day for new developments. We acknowledge that we our current leakage level is too high and we are working to significantly reduce it over 2024-25. Mains renewal helps reduce leakage by replacing pipes that are prone to frequent bursts. We are pleased to note that the Council is supportive of our demand reduction programme overall.

Reference	Comment	Southern Water response
	Water WRMP in its ambition to achieve this aim on water efficiency, given the significant savings predicted by 2050. Supply – The Council does question whether it is optimal and deliverable to implement a significant project of replacing old watermains between now and 2050, whilst at the same time embracing and delivering new technologies. The leakage issue remains a high priority for WDC residents (and indeed, most of the south east region) and is clearly a significant issue for South East Water as well. Whilst the targets set within the draft SWRMP24 are ambitious, there is a concern that in 2021-22 the reported leakage (94.9Ml/d) was marginally above the target of 93.9Ml/d and in 2022-23 leakage levels were above target, with an outturn of 108.47Ml/d against a SWRMP19 forecast of 91.3Ml/d. The Council is supportive of increasing the level of field detection resources, in line with the proposed action plan to reduce leakage, aiming to achieve the set leakage target by 2025. We welcome and support Southern Water's commitment to use learnings from its Asset Management Plan (AMP) 7 programme to develop the WRMP24 leakage reduction programme.	
WRMPSV64	However, it is important that the demand reduction programme focuses fairly on both aspects, i.e. leak reduction and lower consumption so that the burden isn't simply placed on the consumer. Preventing unnecessary losses through repairing leaks should be the first priority. Being able to use a higher proportion of the current resource reduces the need for the measures required to generate additional resources and consequent cost. Although repairs to pipes will result in higher initial costs, the benefits are available for many subsequent years making this a good value for money option. In addition, there needs to be significant investment in education to raise consumer awareness of the reasons why a reduction in water use is required and the benefits to themselves in terms of lower bills and greater certainty of supply.	We thank Southampton City Council for taking the time to review our plan and provide feedback. We are fully aware that we need to demonstrate to our customers that we are playing our part in reducing demand by significantly reducing leakage over time. Our plan to promote water efficiency among both household and non-household customers include educational and awareness campaigns as well as home/site visits to provide information and offer advice.
WRMPSV71	In GARD's opinion, Southern Water is being reasonably ambitious in its plans for leakage and per capita demand reduction, so the balance is probably right.	We thank GARD for taking the time to review our plan and provide feedback. We are pleased to note that GARD considers the balance between supply- and demand-side options to be right.
WRMPSV72	No, as the supply side does not do enough to kerb leaks, replace mains and develop better storage. The demand side may be overstated on population growth which is unclear on how the projection has been determined over what time period. The reduction in individual consumption is good and will mostly be achieved through more meters which should be reinforced with legislation wherever possible. Occasional drought orders are no bad thing in making us all realize there is a finite supply and to take care in use. The Isle of Wight was very used to it before the mainland pipe supply was added and a less onerous restriction on the water company may reduce the need for the high-tech risky solutions proposed.	We thank you for taking the time to review our plan and provide feedback. Our plan to reduce leakage by 53% by 2050 exceeds the 50% target set by the Government. Our leakage target is based on savings that can realistically be achieved with existing technologies. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward. Our plans include imposing restrictions on water use during droughts. These will be implemented before applying for drought permits/orders to increase supply.

Reference	Comment	Southern Water response
WRMPSV73	No. The supply side does not do nearly enough to kerb leaks, replace mains and develop better storage. The demand side may be overstated on population growth as it is unclear on how the projection has been determined over what time period. The reduction in individual consumption is encouraging and will mostly be achieved through more meters which should be reinforced with legislation wherever possible. Occasional drought orders are no bad thing in making us all realize there is a finite supply and to take care in its use. The Isle of Wight was very used to these orders before the mainland pipe supply was added and a less onerous restriction on the water company may reduce the need for the high-tech risky solutions proposed.	We thank you for taking the time to review our plan and provide feedback. Our plan to reduce leakage by 53% by 2050 exceeds the 50% target set by the Government. Our leakage target is based on savings that can realistically be achieved with existing technologies. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward. Our plans include imposing restrictions on water use during droughts. These will be implemented before applying for drought orders to increase supply.
WRMPSV99	No, SW should adopt much stronger measures to reduce demand. Given that in England an average of 19% of water is lost through leaks their target to reduce leaks by 53% by 2050 is inadequate. Other countries can manage it - Paris leaks were reduced from 20% to 5% in just ten years 1. A much more ambitious target of leak reduction and mains replacement is urgently needed. Your consultation document claims that reduction of leaks are costly, with disruption to local communities, yet all of your proposals involve disruption, especially the miles of pipelines that are proposed, and schemes such as effluent recycling are likely to cost well over a £billion. Tackling water leakage more seriously is a better approach than hyper expensive, environmentally damaging effluent recycling. I was horrified to learn that SW can make profit from new infrastructure so it is hard to escape the conclusion that you put shareholders before all other stakeholders and this elaborate scheme is SW's preference over the far more logical and sustainable approach to lessen leakage first.	We thank you for taking the time to review our plan and provide feedback. Our plan to reduce leakage by 53% by 2050 exceeds the 50% target set by the Government. Our leakage target is based on savings that can realistically be achieved with existing technologies. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward. Leakage reduction is one of our performance indicators with financial penalties attached to non-delivery. Apart from being the right thing to do, reducing leakage has financial incentives attached to it.

2.1.2 Question 2: Increasing resilience to droughts

Our plan seeks to improve resilience to droughts by building reservoirs. These include:

- The Havant Thicket Reservoir in Hampshire being delivered jointly with Portsmouth Water
- The South East Strategic Reservoir Option (SESRO) in Oxfordshire being developed jointly with Thames Water and Affinity Water
- The River Adur Offline Reservoir

Question 2 asked the respondents if they supported the building of additional reservoirs. 60% of the respondents supported our strategy of increasing storage capacity; 23% opposed it while the remaining either provided no response or were unsure (Figure 2).

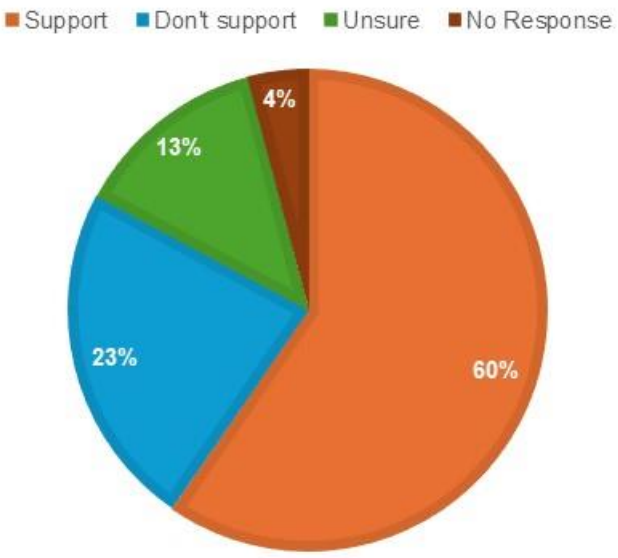

Figure 2: Breakdown of responses to question 2.

Additional comments provided in response to question 2 and our responses to them are given in Table 3.

Table 3: Additional comments on question 2 and our responses.

Reference	Comment	Southern Water response
WRMPSV43	Storage alone is a poor option for providing resilience in droughts, because reservoirs are vulnerable to longer-than-expected droughts and climate change. Desalination and effluent reuse are fully reliable in droughts and immune to climate change. The planned Portsmouth effluent recycling scheme combined with Havant Thicket reservoir provides good resilience to droughts. The [redacted] desalination scheme would also be fully drought resilient, unlike SESRO and the T2ST.	We thank Steventon Parish Council for the feedback. We agree that reservoirs do not provide resilience in the event of prolonged, multi-year droughts but they nevertheless provide additional resilience in droughts of shorter duration. We are pleased to note the Council's support our plans to build a water recycling plant in Hampshire.
WRMPSV44	Storage of the UK's significant annual rainfall should be a lead strategy to provide supply for the summer months, but it seems greater emphasis is being placed on wastewater recycling as the lead strategy. Justification for this technology is highly questionable and not proven in these Consultation materials as presented. I do however recognise the future need for recycling, but in relation to human consumption only as a final solution option and only once all other options and alternatives have been adequately and properly explored and implemented, and there are indeed more sustainable solutions still yet to be adequately considered. I also do not accept SW's statement that customers are indicating a preference for recycling over storage, and I can find nothing in the consultation materials supporting such a claim by SW. Past 'consultations' clearly showed that customers are far from happy about recycling what they passed just a few days ago and nothing much has changed. Even the Defra 'National Drought Group' reported meeting of 16th Oct 2024 emphasised on building more reservoirs and improving crumbling infrastructure to eliminate leaks and that water companies must deliver on their commitment to roll out smart meters. But said nothing at all about recycling wastewater. So where is SW's supporting evidence in making such statements? River Adur Offline Reservoir and many more reservoirs and surface or subsurface storage methods and aquifer recharging should also be higher priority strategies, and this has not been explored adequately it seems. Aquifer storage is a proven solution, and notably in fact even in California. So if SW is going to resort to quoting world-wide recycling locations, then why omit reference to California's own successful use of aquifer storage. Reduction in wastewater generated and flow rate to works owing to storming and eliminating cross infiltration will be important if not critical going forward, in addition to fixing wasteful supply leaks. But additionally, there is also need to enhance the wastewater works operational effectiveness to reduce and eliminate the continuing environmentally damaging chemical and bacteria currently still discharged in Final Effluent into our rivers or sea which unless improved will have potentially considerable relevance to the proposed recycling operational cost and effectiveness. I will return to this subject in more depth later. There appears a considerable lack of meaningful cost to benefit analysis evidence throughout these consultation materials surrounding the various options and likely this is only contained in the missing documents / sections. This therefore seriously compromises a respondent	We thank you for taking the time provide feedback on our plan and pleased to note that you support building additional storage. Annex 5 to our rdWRMP24 Technical Report described the outcome of our customer and stakeholder engagement exercise. Figure 2.2 in the document showed a ranking of water resource options in order of preference by our customers. Our household customers ranked reservoirs just above water recycling. We have considered a number of Aquifer Storage and Recharge (ASR) schemes for our plans over the years. Annex 8 to the SoR published we published in August 2023 described all such schemes and the reasons they were not taken forward. We will reassess these schemes as part of WRMP29. For the steps we are taking to improve our wastewater services, we refer you to our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)). Our plan aims to deliver overall best value to our customers and the environment. While the financial costs in a key element in selection of schemes, it is not the only factor. Additional factors such as resilience and customer preference are also considered. The decision-making process for this plan was described in detail in Section 7.1 of our rdWRMP24 Technical Report. We have considered ca. 50 reservoir locations in the past. We will reassess them for our next plan (WRMP29). Large infrastructure projects like reservoirs typically take 10-15 years to plan and deliver. The time when a scheme is first needed is also very important. We do not want to develop schemes before they are needed as that will result in sub-optimal investment and customers paying for schemes earlier than they need to.

Reference	Comment	Southern Water response
	giving any meaningful informed response …….either way….unless they journey to the authorised location for a supervised viewing which may not be practicable for many (if any) respondents. On the point of reservoirs, Havant Thicket and River Arun Offline Reservoir is not enough and there are likely many other locations that SW does not appear to have re-examined which Portsmouth Water identified decades ago. The original Portsmouth Water research identified up to 60 potential reservoir locations. Many are likely now unfortunately compromised having been built over or land redesignated, but still the remainder need to be re-examined and there appears no indication this has been properly undertaken. Also, why cannot River Arun reservoir be brought forward sooner than 2042 when SW profess, confidently it seems, they are able to deliver fully operational recycling new technology and a 42 km pipeline across Hampshire to [redacted] treatment works by 2034? Has anyone seriously examined the alternative of swopping these dates around and giving priority to the reservoir? Again, where is the cost/benefit analysis in these consultation materials?	
WRMPSV46	The RSPB recognizes the importance of improving resilience to droughts and ensuring water security, but we would strongly advocate for careful, environmentally sensitive planning. All options to provide new water sources have the potential to make significant contributions to drought resilience, river health and legal targets for nature's restoration, as well as providing a range of additional ecosystem services (such as flood prevention, additional water quality improvements, rewetting of lowland peat) as well as contributing to Local Nature Recovery Strategies, but these locations need to be considered sensitively as poor siting can do considerable environmental damage. In general terms however, reservoirs represent a lower carbon option compared with desalination and water recycling and if carefully sited have the potential to deliver multiple benefits for people and nature. If new storage options such as the River Adur Offline Reservoir are to be developed, the RSPB would seek assurances that environmental impacts are minimized, biodiversity is protected, and that mitigation measures are in place to safeguard sensitive habitats. As part of any future reservoir proposals nature should be built into the design from the start, options to enhance the wetted environment and deliver enhancement for species and habitats should be incorporated. We believe there is also value in looking strategically at the needs of both the community and wildlife in the landscape to identify solutions. This could include working with landowners to consider potentially more diverse water storage options, such as restoring historic ponds which could greatly benefit biodiversity as well as potentially providing a local water source.	We thank the RSPB for taking the time to review our plan and provide feedback. We fully agree with the RSPB that potential environmental impacts of all new supply schemes should be carefully considered along the benefits that the schemes are likely to deliver. Environmental Impact Assessments are a key part of the planning process and these will be carried out once the River Adur Offline Reservoir progresses to the planning stage. Our plan aims to deliver overall best value to our customers and the environment.
WRMPSV47	Storage alone is a poor option for providing resilience in droughts, because reservoirs are vulnerable to longer-than-expected droughts and to climate change. Desalination and effluent reuse are fully reliable in droughts and immune to climate change. The planned Portsmouth effluent recycling scheme combined with Havant Thicket reservoir provides good resilience to droughts. The [redacted] desalination scheme would also be fully drought resilient, unlike SESRO and the T2ST.	We thank Garford Parish Meeting for taking the time to review our plan and provide feedback. We agree that reservoirs do not provide resilience in the event of prolonged, multi-year droughts but they nevertheless provide additional resilience in droughts of shorter duration. We are pleased to note the support for our plan to build a water recycling plant in Hampshire.

Reference	Comment	Southern Water response
WRMPSV56	Storage in our opinion is not the most effective way of providing resilience during droughts. As they rely on rainfall and/or extraction from other water sources they have an inherent vulnerability if there is a longer than expected period of drought/low rainfall. Moreover, Southern Water's own WRMP (pages 26 and 27) suggests that both desalination and water recycling are more effective measures for addressing water resilience issues during periods of prolonged drought/low rainfall. Water recycling facilities and desalination plants can also more easily be enlarged if additional water resources are required.	We thank the South Oxfordshire and Vale of White Horse District Council for taking the time to review our plan and provide feedback. We agree that reservoirs do not provide resilience in the event of prolonged, multi-year droughts but they nevertheless provide additional resilience in droughts of shorter duration.
WRMPSV57	Yes. Sussex Wildlife Trust supports the use of supply side options that are the least environmentally harmful and ideally, where benefits to the environment can be delivered. If planned well, reservoirs can deliver biodiversity gains and natural capital enhancements, and are a lower carbon option than desalination and water recycling, providing multiple benefits for people and wildlife. Sussex Wildlife Trust would strongly support a commitment to delivering at least 20% BNG for any new infrastructure, with particular focus on supporting emerging Local Nature Recovery Strategies.	We thank the Sussex Wildlife Trust for reviewing our plan and providing feedback. We are pleased to note that the Trust supports our plan to build new reservoirs.
WRMPSV59	Once again, we consider there is a lack of ambition in these proposals. As far as we can see this proposes the new reservoir at Havant Thicket, which is already being built, but the completion date has been extended by two years. We are not clear why this is. What would be needed to move the project back to its earlier completion date? One other new reservoir is proposed, at Henfield, but we understand not until 2040. Why not sooner? Why are there not plans for more? We are expected increased winter rainfall because of climate change, and we do seem to be experiencing this already. Surely, we need to capture more of this "free" water. The consultation document cites the difficulty of finding suitable sites as one of the obstacles. Difficult is not the same as impossible. We understand that Portsmouth Water found eighty possible sites before they settled on the Havant Thicket. While further investigation would probably have excluded a number of them, this does seem to show that more new reservoirs can be an option. Moreover, more reservoirs would help mitigate the increased flooding we are going to experience in future winters.	We thank the Chichester and Arun Green Party for reviewing our plan and providing feedback. The date of the Havant Thicket Reservoir had to be delayed as previously unknow issues with slope stability in one area was identified during excavation. This is now being addressed. We have considered ca. 50 reservoir locations in the past. We will reassess them for our next plan (WRMP29). Large infrastructure projects like reservoirs typically take 10-15 years to plan and deliver. The time when a scheme is first needed is also very important. We do not want to develop schemes before they are needed as that will result in sub-optimal investment and customers paying for schemes earlier than they need to.
WRMPSV61	This is supported in principle, subject to there being no overriding environmental impacts.	We thank the Wealden District Council for reviewing our plan and providing feedback. We are pleased to know that the Council is supportive of our plan. Detailed Environmental Impact Assessments are carried out as part of major infrastructure schemes.
WRMPSV64	Collecting surplus supply of water during the winter months is a sensible approach to supporting supply during the summer when drought conditions may occur. However, it is important that there aren't adverse impacts on the natural environment as a result of this new storage.	We thank Southampton City Council for providing feedback on our plan and supporting the building of new reservoirs. Detailed Environmental Impact Assessments are carried out as part of major infrastructure schemes.

Reference	Comment	Southern Water response
WRMPSV71	In GARD's opinion, storage alone is a poor option for providing resilience in droughts, because reservoirs are vulnerable to longer-than-expected droughts and climate change. Desalination and effluent reuse are fully reliable in droughts and immune to climate change. The planned Portsmouth effluent recycling scheme combined with Havant Thicket reservoir provides good resilience to droughts (see Section 3.2 of response report). The [redacted] desalination scheme would also be fully drought resilient, unlike SESRO and the T2ST (see Section 6.3 of response report).	We thank GARD for their review of our plan and their feedback. We agree that reservoirs do not provide resilience in the event of prolonged, multi-year droughts but they nevertheless provide additional resilience in droughts of shorter duration.
WRMPSV72	Of course, but there are not nearly enough proposed to capture the more frequent intense summer and winter storms either in the form of reservoirs or aquifer recharge. We are presented with minimal consideration on the impact of those that are proposed or how much more they might cope with summer demand.	We thank you for taking the time to review our plan and provide feedback. We are pleased to note that you support our plan to build new reservoirs. We have considered ca. 50 reservoir locations in the past. We will reassess them for our next plan (WRMP29).
WRMPSV73	Yes, of course, but there are not nearly enough storage proposed to capture the more frequent intense summer and winter storms either in the form of reservoirs or aquifer recharge. We are presented with minimal consideration on the impact of those that are proposed or how much more they might cope with summer demand.	We thank you for taking the time to review our plan and provide feedback. We are pleased to note that you support our plan to build new reservoirs. We have considered ca. 50 reservoir locations in the past. We will reassess them for our next plan (WRMP29).
WRMPSV99	New reservoir completion dates are being extended eg Havant Thicket. One other new reservoir is proposed, at Henfield, but not until 2040. I don't understand why it cant be done sooner? Why are there not plans for more? Increased winter rainfall is expected due to climate change, so it's a no-brainer that we need to capture more of this "free" water. Apparently SW find it difficult to identify suitable sites however I understand that Portsmouth Water found eighty possible sites before they settled on the Havant Thicket. More reservoirs would also help mitigate the increased flooding we are going to experience in future winters.	We thank you for taking the time to review our plan and provide feedback. We have considered ca. 50 reservoir locations in the past. We will reassess them for our next plan (WRMP29). Large infrastructure projects like reservoirs typically take 10-15 years to plan and deliver. The time when a scheme is first needed is also very important. We do not want to develop schemes before they are needed as that will result in sub-optimal investment and customers paying for schemes earlier than they need to.

2.1.3 Question 3: Reducing the amount of water we take from the environment

We need to reduce the amount of water we abstract from rivers, streams and groundwater sources to protect and enhance the environment. Question 3 asked about our plans to reduce the amount of water we take from the environment by 2050.

52% of the respondents supported our approach while 36% opposed it. The remaining were either unsure or did not provide a response (Figure 3).

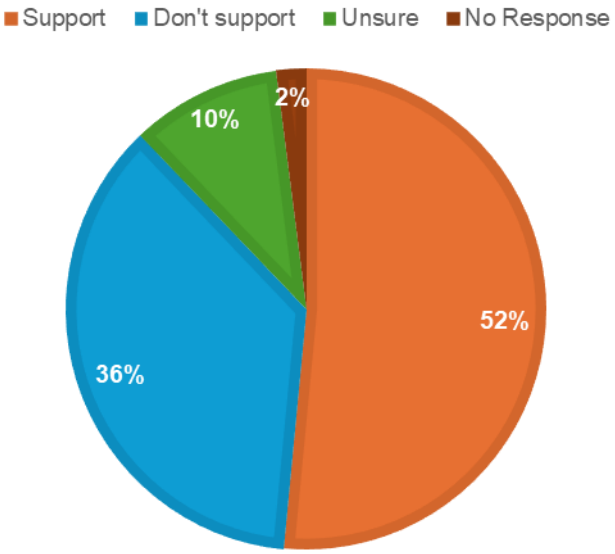

Figure 3: Breakdown of responses to question 3.

Additional comments on question 3 and our responses to them are provided in Table 4.

Table 4: Additional comments on question 3 and our responses.

Reference	Comment	Southern Water response
WRMPSV43	Steventon Parish Council strongly supports plans to reduce over-abstraction where genuinely needed, especially in chalk streams. It fully recognises the iconic status of the Rivers Itchen and Test as the crown jewels of England's chalk streams. However, the planned reductions in the Rivers Itchen and Test are not really needed, as shown by the EA's EFI analysis, Natural England's CSMG analysis and CaBA's A%R analysis. These reductions should not be a driver for the T2ST scheme. However, in view of the importance of the Rivers Itchen and Test, water from the Havant Thicket/recycling scheme should be used as much as possible and as soon as available to reduce abstractions. Southern Water's own reports show that the use of drought orders to allow abstraction from the Rivers Test and Itchen to continue in severe droughts (perhaps, once in 50 years), would have only minimal and temporary environmental impact. Steventon Parish Council does not agree the proposed cessation of the use of lower Itchen and Test drought orders that is driving the need for the Thames to Southern transfer.	We thank Steventon Parish Council for the feedback. The reductions in the amount of water we can take from the rivers Test and Itchen were implemented following an agreement we signed with the Environment Agency under Section 20 of the Water Industry Act 1991 in 2018. It is the Environment Agency's view, supported by Natural England, that these reductions are needed for compliance with the Habitats Directive and the Water Framework Directive. T2ST will not be available before 2040. The Havant Thicket Reservoir and the HWTWRP represent our long-term solutions to end the reliance on drought permits and orders in Hampshire.
WRMPSV44	SW needs to quicken the pace. 2050 is simply too distant and 'reduce' should start happening from latest 2030. Any changes to licenses must also be based on evidence of potential harm and possible adverse environmental impact, and it is noted in the consultation material that SW environment studies on their proposals are still in progress. So how do they know wastewater recycling is the way forward if they have not even finished their environmental and efficacy piloting studies? If SW really and truly wants to help the environment, then there are much more ideal sustainable solutions including the moving of the extraction and FE discharge points further down-stream and away from the header source to help river recovery.	We thank you for taking the time provide feedback on our plan and pleased to note that you support building additional storage. We acknowledge that a number of sustainability reductions in our plan are currently uncertain and unconfirmed. We are investigating the potential environmental impacts of our abstractions at a number of sites as part of the Water Industry National Environment Programme (WINEP). Most of the investigations are due to be completed by 2027. The wastewater recycling project in the Western area is progressing because the changes to our abstraction licences on the rivers Test and Itchen have already been implement. There is no uncertainty regarding these reductions.
WRMPSV46	We are supportive of Southern Water's plans to reduce the amount of water abstracted from the environment by 2050. We support plans to reduce leaks and incentivize consumers to use less water and are supportive of these initiatives being planned early in the WRMP timeline. We also support the company's wider strategy of using all feasible measures to reduce demand before implementing supply-side drought permits or orders. We are pleased that nature-based solutions will be part of the package proposed. We note that the WRMP states that some of the techniques available through this option are uncertain and need further investigation. We urge Southern Water to keep working with stakeholders, including ourselves, to reduce the level of uncertainty around nature-based solutions so that these options can be utilized to its full potential, both to safeguard water supplies, help mitigate flooding events and absorb carbon from the atmosphere. For engineering schemes such as water treatment plants, desalination plants, pipes etc, RSPB would seek assurances that environmental impacts are minimized, biodiversity is	We thank the RSPB for taking the time to review our plan and provide feedback. We are pleased to note the RSPB is supportive of our overall strategy to meet future supply-demand balance challenges through a combination of demand-side and supply-side measures. We will be happy to work with the RSPB and any other stakeholders to reduce the level the uncertainty associated with nature-based solutions. Environmental Impact Assessments are a key part of the planning process and these will be carried out for all infrastructure schemes.

Reference	Comment	Southern Water response
	protected, and that mitigation measures are in place to safeguard sensitive habitats. All opportunities to enhance nature through engineering schemes should be considered and favoured at the planning stage.	
WRMPSV47	Garford Parish Meeting strongly supports plans to reduce over-abstraction where genuinely needed, especially in chalk streams. We are lucky to have the Letcombe Brook flowing up to the boundary of Garford Parish. This chalk stream benefited from a reduction in abstraction 20 or so years ago and has now been restored to a good status. And whilst we recognise the iconic status of the Rivers Itchen and Test as jewels of England's chalk streams, the planned reductions in the Rivers Itchen and Test are in excess of what is needed, as shown by the EA's EFI analysis, Natural England's CSMG analysis and CaBA's A%R analysis. These reductions should not be a driver for the T2ST scheme. However, in view of the importance of the Rivers Itchen and Test, water from the Havant Thicket/recycling scheme should be used as much as possible and as soon as available to reduce abstractions. Southern Water's own reports show that the use of drought orders to allow abstraction from the Rivers Test and Itchen to continue in severe droughts (perhaps, once in 50 years), would have only minimal and temporary environmental impact. Garford Parish Meeting does not agree with the proposed cessation of the use of lower Itchen and Test drought orders that is driving the need for the Thames to Southern transfer.	We thank Garford Parish Meeting for taking the time to review our plan and provide feedback. The reductions in the amount of water we can take from the rivers Test and Itchen were implemented following an agreement we signed with the Environment Agency under Section 20 of the Water Industry Act 1991 in 2018. It is the Environment Agency's view, supported by Natural England, that these reductions are needed for compliance with the Habitats Directive and the Water Framework Directive. As the agreement currently stands, Southern Water cannot rely on droughts options in Hampshire post 2030. T2ST will not be available before 2040.i The Havant Thicket Reservoir and the HWTWRP represent our long-term solutions to end the reliance on drought permits and orders in Hampshire. We note Garford Parish Meeting's view on the cessation of drought options on the rivers Test and Itchen. We are bound by our agreement with the Environment Agency in this regard.
WRMPSV56	Vale of White Horse District Council agrees with the need to reduce the amount of water that is taken from the environment. The council strongly supports plans to reduce over-abstraction and to preserve/enhance chalk streams. We believe that it is incumbent upon all water companies to minimise their impact on the natural world and where possible improve the environment.	We thank the South Oxfordshire and Vale of White Horse District Council for reviewing our plan and providing feedback. We are pleased to note that the Council supports reduction in abstractions to preserve and enhance the environment.
WRMPSV57	It is vital that abstraction is brought down to environmentally sustainable volumes. Since around half of the 2050 national need for 'extra' water is in the South East, the challenges here are acute. If this need is not met by sufficient action to reduce demand, cut leakage and find alternative sustainable supplies, then the suite of globally rare chalk streams that provide much of Southern England's current water supply will continue to bear the brunt of the impact of our water use. We would like to see Southern Water stop using drought orders and drought permits as soon as possible and support 2040 at the latest date this will happen. Abstraction to a potentially damagingly low HoF must be considered a last resort measure and not routine. We urge Southern Water to accelerate a range of measures to reduce reliance on abstraction as quickly as possible.	We thank the Sussex Wildlife Trust for reviewing our plan and providing feedback. We agree that demand management has a very important role to play in reducing our reliance on water from rivers and groundwater. We are pleased to note the Trust considers our planned timeline for ending reliance on supply-side drought permits and orders to be reasonable but would like it to be achieved earlier if possible.
WRMPSV59	We approve of the principle of reducing the volumes of water taken from our rivers and streams. Abstraction from these is contributing significantly to the loss of wildlife in these.	We thank the Chichester and Arun Green Party for reviewing our plan and providing feedback.

Reference	Comment	Southern Water response
	However, we question the measures proposed to achieve this. Clearly, from our previous answer, we see more new reservoirs as one way of reducing the need to abstract from rivers. However, we believe there are other solutions, less expensive and less disruptive than either effluent recycling or even desalination. (To say nothing of the proposal to tanker water from Norway in times of drought!). We welcome the consideration of aquifer storage, especially as it has "a low carbon and environmental impact". However, we understand that only one scheme is proposed, and that the timing of this has been extended from six years to ten years. The forecast yield has also been reduced from 15Ml/day to 5.5Ml/day. Why? And why are there not more proposed sites for this? Surely if there were more sites for aquifer storage the amount of water that could be stored would increase. We understand this is an established and proven technology, that the technology is far less complex and expensive than others proposed, such as effluent recycling. Again, it has the advantage of making use of the "free" water in the winter rains and the additional advantage of no evaporation losses. Is this an example of choosing the option there the company can expect a greater profit? Another way to avoid the environmental harms of abstraction is to move the abstraction sites. At present these are often upstream in the catchments, so they reduce the amount of water available to wildlife along the course of the streams. Moving the abstraction sites downstream and close to the tidal limit will help restore the natural flows, but still enable similar volumes of water to be available. Why has this not been considered.	We note the Party's support for the reduction in the amount of water we take from rivers. The estimated benefit from the River Test MAR scheme has always been stated as 5.5Ml/d. There has been no change to that from the dWRMP24 published in October 2022. MAR and Aquifer Storage and Recovery (ASR) schemes require specific geological and hydrological/hydrogeological conditions to be viable. A longer lead-in time is needed to investigate and pilot test such options before full implementation. We have previously considered the relocation of our Itchen surface water abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not considered viable because of the potential impacts on Portsmouth Water's abstractions in the area and on migratory fish. We have also previously considered moving our abstraction from the River Itchen further downstream, close the tidal limit, and pumping the entire abstraction to Portsmouth Water's water supply works on the River Itchen. This would require a significant increase in the treatment capacity at Portsmouth Water's water supply works. This option was not carried forward because of the potential impact of such a large abstraction on the River Itchen's downstream ecosystems. We nevertheless plan to reassess relocation of abstraction points as part of WRMP29.
WRMPSV61	This is supported in principle. Along with the reduction in water taken from the environment, the draft SWRMP24 also identifies nature-based solutions, such as habitat restoration where there is no alternative solution to reduce or remove the emissions associated with options within the management plan. These nature-based solutions can contribute to delivering an effective Local Nature Recovery Network in Wealden and further afield, including the Sussex Local Nature Recovery Strategy (LNRS).	We thank the Wealden District Council for reviewing our plan and providing feedback. We are pleased to know that the Council is supportive of our plan and agrees that nature-based solutions have a role to play in protecting and enhancing the environment.
WRMPSV64	England contains 85% of the world's chalk streams which means that Hampshire's chalk streams are important on a global scale. Protection of the species which rely on these special waterways needs to be a priority. Maintenance of higher levels of water in the rivers will help to reduce the effects of other environmental pressures such as higher water temperatures/lower oxygen levels caused by climate change. This will ensure that populations of iconic species such as the Atlantic salmon will survive in the longer term.	We thank Southampton City Council for providing feedback on our plan. We note the Council's support for our plan and agrees that we need to protect, and where possible, enhance our aquatic environment.
WRMPSV71	GARD strongly supports plans to reduce over-abstraction where genuinely needed, especially in chalk streams. It fully recognises the iconic status of the Rivers Itchen and Test as the crown jewels of England's chalk streams. However, the planned reductions in the WRMP for the upper Rivers Itchen and Test are not needed according to the EA's EFI analysis, Natural England's CSMG analysis and CaBA's A%R analysis (see Section 3.6 of response report). These reductions should not be a driver for the T2ST scheme.	We thank GARD for providing feedback on our plan. The reductions in the amount of water we can take from the rivers Test and Itchen were implemented following an agreement we signed with the Environment Agency under Section 20 of the Water Resources Act 1991 in 2018. It is the Environment Agency's view, supported by Natural England, that these reductions are needed for compliance with the Habitats Directive and the Water Framework Directive. The agreement expires in 2030. We will therefore need to discuss any implications of our extended timeframes to use drought options

Reference	Comment	Southern Water response
	However, in view of the importance of the Rivers Itchen and Test, water from the 60-90 Ml/d Havant Thicket/recycling scheme should be used as much as possible and as soon as available to reduce abstractions (see Sections 3.2, 3.3 and 4.4 of response report). The Havant Thicket/recycling scheme can reduce the abstractions from the lower Test and Itchen at all times, not just in droughts. It will reduce the impacts on flows and salmon migration in normal and moderately dry years, as well as delaying or avoiding river flows falling below hands-off flows and triggering drought orders. The use of the scheme to minimise abstraction impacts should be detailed explicitly in the WRMP. The priority should be environmental improvements, not cost saving. These benefits can be realised by the early 2030s, 5-10 years earlier than the T2ST and SESRO. Southern Water's own reports show that the use of drought orders to allow abstraction from the Rivers Test and Itchen to continue in severe droughts (perhaps, once in 50 years), would have only minimal and temporary environmental impact (see Section 4.2 of response report). As explained at length in the response report, GARD does not agree the proposed cessation of the use of lower Itchen and Test drought orders that is driving the need for the Thames to Southern transfer. To a large extent, the continued use of the drought orders and permits will be mitigated by making best use of the 60-90 Ml/d of water that will be available to Southern Water through the Havant Thicket/recycling scheme. In addition, GARD proposes that part of the £1.6 billion cost saving should be spent on improvement measures for the Rivers Itchen and Test. Mitigation measures should focus on habitat restoration work, especially in areas that are used for spawning and juvenile nurseries for salmon and sea trout, removal of barriers to migration and water quality improvements (Section 6.1 of response report). The lower Itchen abstractions around [redacted] affect river flows for about 10 km downstream, all of which is heavily used for salmon spawning. These impacts could be entirely eliminated, in times of normal operation as well in droughts, by moving the lower Itchen abstractions around [redacted] down to [redacted]. As well as eliminating abstraction impacts on the salmon spawning, this would also remove concerns over impacts on flow-dependent plants and southern damselfly (Section 6.2 of response report).	in the Hampshire area beyond 2030 with our regulators. T2ST will not be available before 2040. Reductions to our abstraction licences on the rivers Test and Itchen are primary drivers for the Havant Thicket Reservoir and the HWTWRP; planned to be delivered in 2031 and 2034 respectively. T2ST is not being driven by the need to cease the use of River Test and River Itchen drought orders. It is however a key part of our plan for a resilient supply system going forward. We agree with GARD that the delivery of the Havant Thicket Reservoir and the HWTWRP will end the reliance on drought permits and orders in Hampshire. As part of the agreement we signed with the Environment Agency in 2018 under section 20 of the Water Resources Act 1991, we are also providing a suite of mitigation and compensatory environmental protection measures in Hampshire. We have previously considered the relocation of our Itchen surface water abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not considered viable because of the potential impacts on Portsmouth Water's abstractions in the area and on migratory fish. We have also previously considered moving our abstraction from the River Itchen further downstream, close the tidal limit, and pumping the entire abstraction to Portsmouth Water's water supply works on the River Itchen. This would require a significant increase in the treatment capacity at Portsmouth Water's water supply works. This option was not carried forward because of the potential impact of such a large abstraction on the River Itchen's downstream ecosystems. We nevertheless plan to reassess relocation of abstraction points as part of WRMP29.
WRMPSV72	I am not against taking less from the Hampshire chalk streams in our area, but the effect of the proposal is to ramp up the solution of wastewater recycling. I do not think that enough thought has been given to extraction much further down stream to preserve the flow in the upper reaches nor do I understand if enough effort has been put into aquifer recharge or other recharge methods when flows are high and can be recycled back; but not from WW recycling.	We thank you for taking the time to review our plan and provide feedback. We have previously considered the relocation of our abstraction from the Itchen surface water abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not considered viable because of the potential impacts on Portsmouth Water's abstractions in the area and on migratory fish. We have also previously considered moving our abstraction from the River Itchen further downstream, close the tidal limit, and pumping the entire abstraction to Portsmouth Water's water supply works on the River Itchen. This would require a significant increase in the treatment capacity at Portsmouth Water's water supply works. This option was not carried forward because of the potential impact of such a large abstraction on the River Itchen's downstream ecosystems.

Reference	Comment	Southern Water response
		We nevertheless plan to reassess relocation of abstraction points as part of WRMP29.
WRMPSV73	While I am not against taking less from the Hampshire chalk streams, the effect of the proposal is to ramp up the solution of wastewater recycling. I do not think that enough thought has been given to extraction much further down stream to preserve the flow in the upper reaches nor do I think that enough effort has been put into aquifer recharge or other recharge methods when flows are high and can be recycled back. If its is got right then it potentially negates the requirement for WW recycling.	We thank you for taking the time to review our plan and provide feedback. We have previously considered the relocation of our Itchen surface water abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not considered viable because of the potential impacts on Portsmouth Water's abstractions in the area and on migratory fish. We have also previously considered moving our abstraction from the River Itchen further downstream, close the tidal limit, and pumping the entire abstraction to Portsmouth Water's water supply works on the River Itchen. This would require a significant increase in the treatment capacity at Portsmouth Water's water supply works. This option was not carried forward because of the potential impact of such a large abstraction on the River Itchen's downstream ecosystems. We nevertheless plan to reassess relocation of abstraction points as part of WRMP29.
WRMPSV99	Reduced volumes of water abstraction from our rivers and streams is essential, especially as current levels are leading significantly to the loss of wildlife in these. However, effluent recycling or even desalination is not the way. Aquifer storage is sensible, especially as it has "a low carbon and environmental impact". However it seems only one scheme is proposed, and that the timing of this has been extended from six years to ten years. The forecast yield has also been reduced from 15Ml/day to 5.5Ml/day. Why? And why are there not more proposed sites for this? Surely if there were more sites for aquifer storage the amount of water that could be stored would increase. We understand this is an established and proven technology, that the technology is far less complex and expensive than others proposed, such as effluent recycling. Again, it has the advantage of making use of the "free" water in the winter and the additional advantage of no evaporation losses. Is this an example of choosing the option which will generate more profit for the company ? Another way to avoid the environmental harms of abstraction is to move the abstraction sites. At present these are often upstream in the catchments, so they reduce the amount of water available to wildlife along the course of the streams. Moving the abstraction sites downstream and close to the tidal limit will help restore the natural flows, but still enable similar volumes of water to be available. It seems this not even been considered?	We thank you for taking the time to review our plan and provide feedback. The estimated benefit from the River Test MAR scheme has always been stated as 5.5Ml/d. There has been no change to that from the dWRMP24 published in October 2022. MAR and Aquifer Storage and Recovery (ASR) schemes require specific geological and hydrological/hydrogeological conditions to be viable. A longer lead-in time is needed to investigate and pilot test such options before full implementation. We have previously considered the relocation of our Itchen surface water abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not considered viable because of the potential impacts on Portsmouth Water's abstractions in the area and on migratory fish. We have also previously considered moving our abstraction from the River Itchen further downstream, close the tidal limit, and pumping the entire abstraction to Portsmouth Water's water supply works on the River Itchen. This would require a significant increase in the treatment capacity at Portsmouth Water's water supply works. This option was not carried forward because of the potential impact of such a large abstraction on the River Itchen's downstream ecosystems. We nevertheless plan to reassess relocation of abstraction points as part of WRMP29.

2.1.4 Question 4: The balance between cost, resilience and protecting the environment

Our preferred Best Value plan solves the supply-demand balance by maximising the value of the best value metrics to the extent possible. We have also considered alternative plans which optimise on cost, environment and social value and resilience. When developing this plan, we also considered the carbon impact of all the options.

Question 4 asked if we have struck the right balance between cost, resilience and environmental protection.

53% did not think we had achieved the right balance, 23% thought we did while the remaining were either unsure or did not respond (Figure 4).

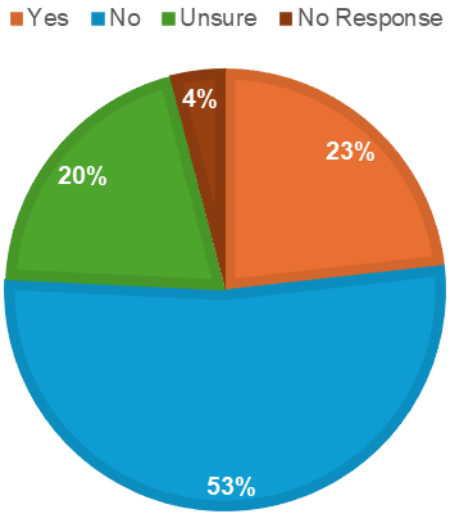

Figure 4: Breakdown of responses to question 4.

Additional comments provided in response to question 4 and our responses to them are given in Table 5.

Table 5: Additional comments on question 4 and our responses.

Reference	Comment	Southern Water response
WRMPSV43	The plan to spend £1.6 billion on T2ST to avoid rare, minimal and temporary impacts on the Rivers Test and Itchen is a huge waste of money, especially bearing in mind the substantial environmental impact of the T2ST itself. The balance between cost and protecting the environment is utterly wrong. The money would be better spent on mitigation measures including the moving of some of the [redacted] abstractions 10 km down the River Itchen to [redacted]. There has been no consideration of whether the small and very occasional ecological benefits of avoiding use of Test and Itchen drought orders justify the environmental impacts of constructing SESRO and the 75 km Thames to Southern transfer pipeline.	We thank Steventon Parish Council for the feedback note its view on the balance between cost, resilience and environmental protection. We have previously considered the relocation of our Itchen surface water abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not considered viable because of the potential impacts on Portsmouth Water's abstractions in the area and on migratory fish. We have also previously considered moving our abstraction from the River Itchen further downstream, close the tidal limit, and pumping the entire abstraction to Portsmouth Water's water supply works on the River Itchen. This would require a significant increase in the treatment capacity at Portsmouth Water's water supply works. This option was not carried forward because of the potential impact of such a large abstraction on the River Itchen's downstream ecosystems. We nevertheless plan to reassess relocation of abstraction points as part of WRMP29. We note the Council's view on the use of drought options on the rivers Test and Itchen. We do not necessarily disagree but are bound by our agreement with the Environment Agency in this regard.
WRMPSV44	I do not think the right and appropriate balance has been achieved. The principal and primary objective is to reduce substantially what is taken from the environment and yet meet future water demand and this may well result in higher costs to the consumer. But we also need to ensure that whatever options / plans we adopt represents best value and are properly evaluated, executed and operated diligently. This again is not properly presented in the consultation material. Aquifer or reservoir storage does not need operating machinery running 24/7, whereas recycling will need to maintain a constant 365-day operation 24/7 and will, therefore, consume a vast amount of energy and gives rise to higher maintenance cost just to keep the process functioning 365 which will ultimately fall on the customer bills. Again, where is the analysis examining the options?	We thank you for taking the time provide feedback on our plan and note your view on the balance between cost, resilience and environmental protection.
WRMPSV47	Southern Water's WRMP proposes to spend £1.6 billion on T2ST and Southern Water's 30% share of SESRO. This is to avoid rare, minimal and temporary impacts on the Rivers Test and Itchen and is a huge waste of money. This is especially true given the very considerable environmental damage caused by T2ST and SESRO. One of Garford's residents has done considerable work evaluating the environmental impact of both T2ST and SESRO – and found that the environmental impacts of both are materially understated in the WRMP and associated plans. He has identified that the T2ST pipeline would have adverse impacts on the North Wessex Downs AONB, several protected sites and a number of ancient woodlands. A quarter of the proposed pipeline corridor passes through areas identified by Natural England as SSSI high impact risk zones, including along the River Test. When combined with the adverse impacts of SESRO, we believe that the impacts would more than offset the minimal benefits achieved for the Rivers Itchen and Test.eWe note Ofwat's response to the emerging	We thank Garford Parish Meeting for taking the time to review our plan and provide feedback. T2ST is a key part of our plans to develop a resilient supply system but is not directly linked to reductions in abstractions from the rivers Test and Itchen. T2ST is also not solely dependent on SESRO. The end on reliance on supply-side drought options by 2041 in the WRSE Regional Plan as well as WRMP24s of its member companies is in response to the regulatory requirement of achieving resilience to droughts of up to 1-in-500 year severity as soon as practicable. As mentioned above, there is not a one-to-one relationship between cessation of drought options on the rivers Test and Itchen and T2ST. Under the agreement we signed with the

Reference	Comment	Southern Water response
	WRSE regional plan: "Ofwat noted the commitment to not use drought orders or permits as options after 2040, except for events in excess of the 1 in 500 year return period. WRSE should explore the cost, benefit and option selection impact of retaining the use of some drought orders and permits beyond 2040. It stated this was important to avoid unnecessary costs from resource development and to avoid the associated environmental impact that the additional developmentellikely to arise from ruling out the use of drought orders and permits could bringlGarford Parish Meeting consider the balance between cost and protecting the environment is utterly wrong. We note that WRSE's assessment of the sum of the benefits of achieving WFD good ecological status for the Test and Itchen are £42m, reduced to £29m on a risk adjusted basis.l Thus the costs of T2ST and 30% of SESRO (£1.6bn) are more than 50 times greater than the level of assessed benefits. Money would be better spent on mitigation measures including the moving of some of the [redacted] abstractions 10 km down the River Itchen to [redacted]. There appears to have been no consideration of whether the small and very occasional ecological benefits of avoiding use of Test and Itchen drought orders justify the environmental and financial impacts of constructing SESRO and the 75 km Thames to Southern transfer pipeline.	Environment Agency in 2018 under Section 20 of the Water Industry Act 1991, we cannot use these drought options beyond 2030. T2ST will not be available before 2040. We have previously considered the relocation of our abstraction from the Itchen surface water abstraction to a point nearly 11km downstream just upstream of the tidal limit of the River Itchen. This was not considered viable because of the potential impacts on Portsmouth Water's abstractions in the area and on migratory fish. We have also previously considered moving our abstraction from the River Itchen further downstream, close the tidal limit, and pumping the entire abstraction to Portsmouth Water's water supply works on the River Itchen. This would require a significant increase in the treatment capacity at Portsmouth Water's water supply works. This option was not carried forward because of the potential impact of such a large abstraction on the River Itchen's downstream ecosystems. We nevertheless plan to reassess relocation of abstraction points as part of WRMP29. We note the expressed view on the use of drought options on the rivers Test and Itchen. We do not necessarily disagree but are bound by our agreement with the Environment Agency in this regard.
WRMPSV57	The resilience of our natural environment and our water sector is fundamentally interconnected. All water company plans must prioritise action to deliver environmental improvements that restore and enhance our fragmented, polluted and degraded freshwater and coastal habitats. Working with nature at the catchment scale can address multiple stressors acting on the water environment effectively and efficiently, whilst also delivering wider benefits for people and wildlife. Nature-based solutions are often cheaper than traditional, concrete-based approaches and create opportunities for blended finance, further increasing value for money. We are therefore please to see that Southern Water's Environmental Destination for 2050 is aligned with the collaborative Catchment First approach, with ambition to go beyond protecting the environment to improving it. However, we would like to see greater commitment to the use and funding of catchment and nature-based solutions to deliver the scale and urgency of change required. Currently, the majority of the actions committed to in the DWMP involve hard engineering and this should be addressed.	We thank the Sussex Wildlife Trust for reviewing our plan and providing feedback. We agree with the Trust's view that nature-based solutions should be prioritised on hard infrastructure where possible.
WRMPSV59	It will be clear from our previous answers that we do not agree. In particular we think the plans for effluent recycling are both expensive and unsustainable. A recent report by Lewes District Council Southern Water Panel identified that the SW investment plan would raise customer bills by 91% over the next five years. The regulator OFWAT has put a ceiling of a 45% on bill increases. This is still a very large increase and leaves a 46% gap in their investment plans. Surely this raises important questions about the expense and financial viability of these plans. If there are cheaper alternatives, (which we think there are) they should be explored and	We thank the Chichester and Arun Green Party for providing feedback. We note the concerns expressed.

Reference	Comment	Southern Water response
	implemented first. We also have serious misgivings about the environmental consequences of these plans which we will discuss further down this submission.	
WRMPSV61	There will be an inevitable financial cost in developing more sustainable measures to deal with water supply. However, the resulting impact on estimated bills should be minimised as water supply should be affordable for all. In this respect, it is concerning that the estimated bill impacts escalate throughout each year of the AMP8 programme."	Thank you for taking the time to review our plan and provide feedback. The need to invest in our supply system to make it more resilient inevitably has an impact on our customer bills. We have measures in place to help customers who may find it difficult to pay their bills.
WRMPSV64	There should be lower profits for shareholders and more investment in the public good.	We thank you for providing feedback on our plan. Your comment is noted.
WRMPSV71	In GARD's opinion, the absurd plan to spend £1.6 billion on T2ST to avoid rare, minimal and temporary impacts on the Rivers Test and Itchen is a huge waste of money, especially bearing in mind the substantial environmental impact of the T2ST itself (see Sections 4.2 and 5 of response report). The balance between cost and protecting the environment is utterly wrong (see Section 4.5 of response report). Some of the £1.6 billion would be better spent on the mitigation measures described in our answer to Question 3 and the balance of the saving would reduce customer bills for generations to come. There has been no consideration of whether the small and very occasional ecological benefits of avoiding use of Test and Itchen drought orders justify the environmental impacts of constructing SESRO and the 75 km Thames to Southern transfer pipeline (see Section 5.8 of response report).	We thank Garford Parish Meeting for taking the time to review our plan and provide feedback. T2ST is a key part of our plans to develop a resilient supply system but is not directly linked to reductions in abstractions from the rivers Test and Itchen. T2ST is also not solely dependent on SESRO. As mentioned above, there is not a one-to-one relationship between cessation of drought options on the rivers Test and Itchen and T2ST. Under the agreement we signed with the Environment Agency in 2018 under Section 20 of the Water Industry Act 1991, we cannot use these drought options beyond 2030. T2ST will not be available before 2040. We note the expressed view on the use of drought options on the rivers Test and Itchen. We do not necessarily disagree but are bound by our agreement with the Environment Agency in this regard.
WRMPSV72	The preferred use of waste or salt-water recycling is the most expensive method, increases pollution in both emissions and residue and is at risk of breakdown requiring continuous running for some 30-50% of the time whether or not additional supply is needed. In the worst case if high demand is not needed, which will be more often than not, and the output cannot be used for recharge of rivers or storage then it will simply be recycled out to sea at a complete waste of resources.	We thank you for providing feedback on our plan. We acknowledge that desalination and water recycling plants have high operating costs. However, the inclusion of these options in our plan is out of necessity. We cannot take more water from rivers and groundwater in our supply area. In a number of cases, we are required to reduce the amount of water we take from the environment.
WRMPSV73	The preferred use of waste or salt-water recycling is the most expensive method, increases pollution in both emissions and residue and is at risk of breakdown requiring continuous running for some 30-50% of the time whether or not additional supply is needed. In the worst case if high demand is not needed, which I think will be more often than not, and the output cannot be used for recharge of rivers or storage then it will simply be recycled out to sea at a complete waste of resources.	We thank you for reviewing our plan and providing feedback. We acknowledge that desalination and water recycling plants have high operating costs. However, the inclusion of these options in our plan is out of necessity. We cannot take more water from rivers and groundwater in our supply area. In a number of cases, we are required to reduce the amount of water we take from the environment.
WRMPSV99	The plans for effluent recycling are both expensive and unsustainable. A recent report by Lewes District Council Southern Water Panel identified that the SW investment plan would	We thank you for taking the time to review our plan and provide feedback.

Reference	Comment	Southern Water response
	raise customer bills by 91% over the next five years. The regulator OFWAT has put a ceiling of a 45% on bill increases. This is still a very large increase and leaves a 46% gap in their investment plans. Surely this raises important questions about the expense and financial viability of these plans. If there are cheaper alternatives, (which we think there are) they should be explored and implemented first.	We note the concerns expressed.

2.1.5 Question 5: Frequency of water-use restrictions during drought

While we are aiming to eliminate reliance on measures to increase supplies in droughts of up to 1-in-500 year severity, we still plan to introduce restrictions on water use by customers during droughts. This is done so that we do not build schemes that will only be required during periods of drought and therefore do not deliver value for money for our customers under normal weather conditions. Question 5 asked if this was an acceptable approach.

81% of the respondents fully supported our approach. 12% did not support it and the remaining were either unsure or did not provide a response. (Figure 5).

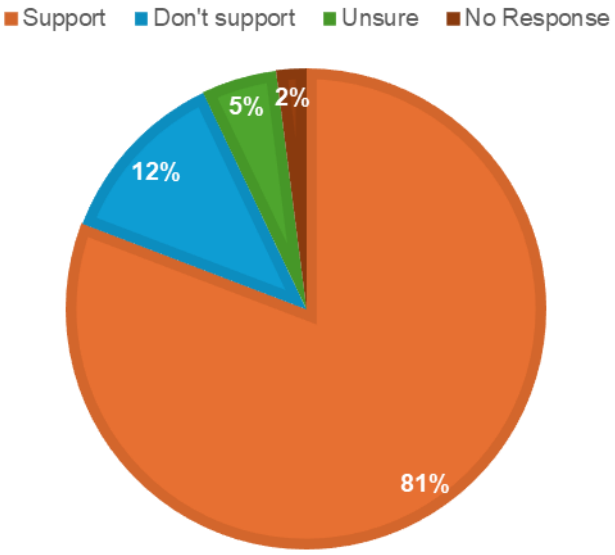

Figure 5: Breakdown of responses to question 5.

Additional comments provided in response to question 5 and our responses to them are given in Table 6.

Table 6: Additional comments on question 5 and our responses.

Reference	Comment	Southern Water response
WRMPSV43	The current levels of service are about right: temporary use bans 1 year in 10 and non-essential use bans 1 year in 20 (according to Southern Water 2022 drought plan).	We thank Steventon Parish Council for the feedback and note that it does not support more frequent use of water-use restrictions.
WRMPSV44	But this should be a statement of fact and a resulting consequence after all other options are exhausted, not a question at this time. If all the right actions are taken including consumers being properly educated (and disciplined) then the question and decision should be made when it becomes absolutely (last resort) necessary and not posed now. The chance of this being needed will undoubtedly be minimised or maybe even eliminated if indeed the right actions and measures are implemented fully and effectively, but if consumer behaviours do persist and they are not adequately responding to preserve precious water supply then shock restrictions might serve as a useful reminder from time to time. Water meters and consumption would also tell you where the problems are!	We thank you for taking the time provide feedback on our plan. We note your comments.
WRMPSV46	The RSPB would support more frequent restrictions on non-essential water use such as temporary use bans and non-essential use bans, as a necessary tool to improve drought resilience and reduce the environmental impact of water extraction during drought periods. However, these measures need to ensure that vulnerable communities are not disproportionately affected by restrictions. This initiative also needs to be part of a wider, long-term strategy that also looks at improved water efficiency, alternative water sources, and environmental protections to ensure sustainable water management in the context of climate change impacts.	We thank the RSPB for taking the time to review our plan and provide feedback. We note the RSPB's support for more frequent use of restrictions during droughts and agree that vulnerable communities will need to be protected.
WRMPSV47	The current levels of service are about right: temporary use bans 1 year in 10 and non-essential use bans 1 year in 20 (according to Southern Water 2022 drought plan).	We thank Garford Parish Meeting for taking the time to review our plan and provide feedback. We note that it does not support more frequent use of water-use restrictions.
WRMPSV56	We would support more frequent restrictions, such as temporary use bans and non-essential use bans, if it reduced the amount of water that was taken from the natural environment during droughts.	We thank the South Oxfordshire and Vale of White Horse District Council for its feedback. We note that the Council supports more frequent implementation water-use restrictions during droughts.
WRMPSV59	As a nation we tend to take water for granted and are generally fairly wasteful. There is a need for a culture change and this is difficult to achieve. Unfortunately, restrictions in water use will be necessary at times and as well as reducing water demand in times of shortage it would help encourage a change in culture. However, these restrictions should be implemented fairly. They also need to be applied to business as well as domestic users, and where new businesses have a high level of water use, this should be a material consideration in any planning process.	We thank the Chichester and Arun Green Party for providing feedback. We agree that the measures need to be implemented fairly.
WRMPSV61	This proposed measure is supported in principle.	We thank the Wealden District Council for providing feedback and note its support for the measure.

Reference	Comment	Southern Water response
WRMPSV64	At the present time, ahead of more water efficient buildings, temporary restrictions are acceptable. However, these should have strict terms for their use to avoid impacting residents and businesses. Pressure should be directed on government to improve building regulations to require new development to deliver 110 litres per person.	We thank Southampton City Council for providing feedback on our plan and note the comment on stricter terms for implementation.
WRMPSV71	In GARD's opinion, the current levels of service are about right: temporary use bans 1 year in 10 and non-essential use bans 1 year in 20 (according to Southern Water 2022 drought plan).	We thank GARD for providing feedback on our plan and note that it does not support more frequent use of water-use restrictions.
WRMPSV72	See answers above. Southern Water has already been offering water butts and rain gardens as part of it's CSO discharges pathfinder project on the Isle of Wight. This should be extended widely across the region with legislative backing to assist reduction in demand and reduction of rainwater into combined sewage systems which are also spread throughout the region.	We thank you for taking the time to review our plan and provide feedback. Your comment is noted.
WRMPSV73	See answers above. Southern Water has already been offering water butts and rain gardens as part of it's CSO discharges pathfinder project on the Isle of Wight. This should be extended widely across the region with legislative backing to assist reduction in demand and reduction of rainwater into combined sewage systems which are also spread throughout the region.	We thank you for taking the time to review our plan and provide feedback. Your comment is noted.
WRMPSV99	Restrictions in water use will be necessary at times and as well as reducing water demand in times of shortage govt should encourage a change in our wasteful culture. However, these restrictions should be implemented fairly and applied to business as well as domestic users, If new businesses have a high level of water use, this should be a material consideration in any planning process.	We thank you for taking the time to provide feedback. We note your support for increase in the use of this measure and the need for its fair implementation.

2.1.6 Question 6: Long-term PCC target

As mentioned earlier, reducing demand is a key part of our strategy to maintain supply-demand balance up to 2075. We plan to reduce average PCC to 110 litres per person per day by 2045 under dry year conditions. This is 5 years ahead of the 2050 date set by the Government to achieve this level of PCC. We sought views on whether we had set an appropriate PCC target.

There was broad support for this target with 63% of the respondents supporting it. 14% did not support it while the remaining were either unsure or did not provide a response (Figure 6).

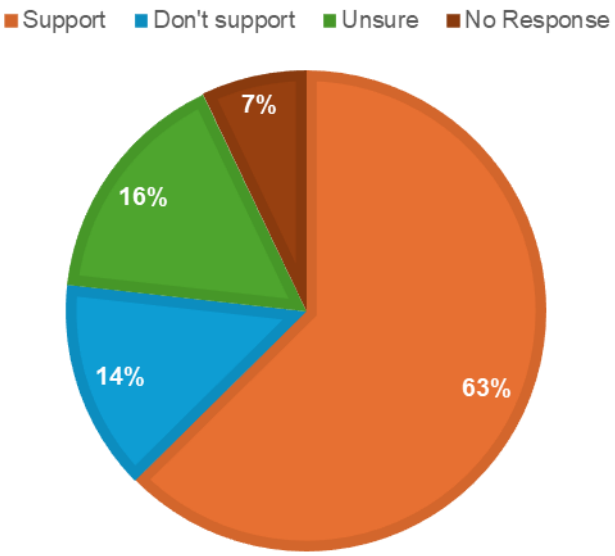

Figure 6: Breakdown of responses to question 6.

Additional comments provided in response to question 6 and our responses to them are given in Table 7.

Table 7: Additional comments on question 6 and our responses.

Reference	Comment	Southern Water response
WRMPSV44	Of course. Which is why all consumers need meters asap and by latest 2030 (and not 2045) to monitor consumer performance and thereby identify who is not attempting to conserve water. 2045 is way too far into the future.	We thank you for the feedback. Nearly 88% of our household customers and 93% of our non-household customers are metered. As part of our demand management programme, we aim to replace all our existing meters with smart meters.
WRMPSV46	The RSPB supported in the previous consultation the more ambitious target of reducing average personal daily use from 131 litres per person per day to 100 litres per person per day by 2040. Demand reduction is essential, the less water wasted as a result of leaks or inefficient use the fewer new schemes are required which have the potential to create further environmental impacts.	We thank the RSPB for providing feedback on our plan. We aim to achieve a PCC value of 110 litres per person per day by 2045 under dry year conditions. This equates to PCC of 100 litres per person per day under normal year conditions.
WRMPSV56	While Vale of White Horse District Council notes Southern Water's target of reducing the average amount of water used by a person per day from 128 litres to 110 litres, and suggests that consideration is given to introducing more ambitious targets – especially in an area/region classified as being 'water-stressed'. In our draft Joint Local Plan, we have developed Policy CE7 which requires that "All new homes must be designed to high water efficiency standards, with water use not exceeding 100 litres per person per day, or any future tighter standard that may replace this." By working similarly with local authorities in your region, you could also lower future demand, recalculate your future additional needs and cut back on high investment/ high environmental cost proposals in the draft strategy, like the proposed Thames to Southern Transfer Project. We would be happy to assist further in discussions with you and/or local authorities in your region by providing information about our Joint Local Plan policy and the technical studies that support it. Our local plan website is https://www.whitehorsedc.gov.uk/vale-of-white-horse-district-council/planning-and-development/local-plan-and-planning-policies/local-plan-2041/	We thank the South Oxfordshire and Vale of White Horse District Council for its feedback and sharing the link to the Joint Local Plan policy We are working with local authorities in our supply area and are encouraging them to promote a PCC standard of 85 litres per person per day for all new builds.
WRMPSV57	Sussex Wildlife Trust recognises that there are considerable challenges in maintaining an adequate water supply for a growing population in an area of high environmental sensitivity, which is already experiencing serious water stress. However, we strongly believe that managing demand should be the primary long-term solution to the sustainable development of water resources in the South East. We are therefore very supportive of Southern Water's industry-leading position on demand reduction and are pleased to see the WRMP exceeding the government's target of 110 litres of water per person per day by 2050. We were previously strongly supportive of Southern Water's more ambitious target of 100 litres per day by 2040. It is not clear if this target is being dropped, but we would strongly support a more ambitious target. We note that due to water neutrality, a number of planning authorities in Sussex are aiming for a target of 85 litres per day per person for new builds and conversions. Given Southern Water's involvement in this issue, we would like to see further investigation into this as a wider target for your supply area. Sussex Wildlife Trust believes	We thank Sussex Wildlife Trust for its feedback. We are pleased that it supports our PCC target. A PCC of 110 litres per person under dry year conditions equates to a PCC of 100 litres per person per day under normal year conditions. We are planning to reach this figure by 2045 instead of 2040 as was included in our previous plan. The slight revision in the PCC target was necessitated by high PCC during periods of COVID-19 lockdown and the fact that a large proportion of the workforce continues to work from home for at least a part of the week. However, we are committed to exploring options that will deliver either greater benefits and/or deliver them earlier. This includes exploring options that may not be in our current plan. We thank the Wealden District Council for providing feedback and note its support for the measure.

Reference	Comment	Southern Water response
	that the priority for all water company plans is to reduce the need for water resources as much as possible, and then secure those resources in the best way possible. This must be done in a way that meets the needs of the environment first, before considering how additional needs from businesses and households are met."	
WRMPSV61	Please refer to the Council's answer to Question 1 in relation to the demand for water.	We thank the Wealden District Council for providing feedback. Our response to the Council's comments under Question 1 is given in **Error! Reference source not found.** above.
WRMPSV64	It is a sensible approach to make homes and buildings more water efficient but delaying this for twenty years creates a legacy of non-compliant buildings which will place an unfair burden on other water consumers. Southern Water should strongly encourage Local Planning Authorities to include policies requiring the 110 litres per person standard in their Local Plans to ensure that new development in South Hampshire doesn't create additional water stress. The pressure on water supplies should be reviewed in light of the Government's requirement for additional housing in the SE.	We thank Southampton City Council for providing feedback on our plan. We are promoting water efficiency among our customers. The 20 year time horizon is for achieving our target PCC. We will be implementing a host of measures in the 2025-30 planning period, including replacing all existing meters with smart meters. We actively working with some local planning authorities and advocating a PCC of 85 litres per person per day for new builds.
WRMPSV71	Yes, GARD supports this and welcomes the planned further reduction to 105 l/person/day.	We thank GARD for its feedback and support for our PCC target.
WRMPSV72	It is achievable with meters and water butts and encouragement of grey water use externally whenever possible.	We thank you for your feedback and are pleased to note your support of our PCC target.
WRMPSV73	In my view it is achievable with meters and water butts and encouragement of grey water use externally whenever possible.	We thank you for your feedback and are pleased to note your support of our PCC target.

2.1.7 Question 7: Bulk import of water from Norway via sea tankers

Until the Hampshire Water Transfer and Water Recycling Project (HWTWRP) is delivered in 2034, we need to secure supplies during droughts in Hampshire. Our plan includes an option to import up to 45Ml/d from Norway via sea tankers in the event of a drought between 2031 and 2034 to reduce the water needed from the River Test drought option. Question 7 asked whether temporarily importing water from Norway via sea tankers was supported.

45% of the respondents supported this approach while 30% opposed it. The remaining were either unsure or did not provide a response (Figure 7).

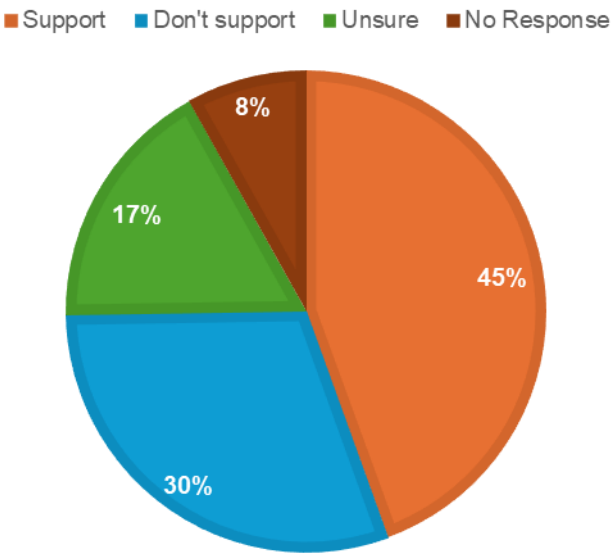

Figure 7: Breakdown of responses to question 7.

Additional comments provided in response to question 7 and our responses to them are given in Table 8.

Table 8: Additional comments on question 7 and our responses.

Reference	Comment	Southern Water response
WRMPSV43	If Southern Water is forced to stop using drought orders and permits, tankered water from Norway should still be considered as an alternative to T2ST plus SESRO, bearing in mind how rarely this would be needed.	We thank Steventon Parish Council for its feedback and note its qualified support for the option.
WRMPSV44	Maybe. I would support any proposal, however bizarre it might seem, to avoid taking water from, by then, an equally stressed River Test or aquifer if it were seriously practical. But getting snow melt fresh water from Norway by tanker is highly questionable and likely will not prove to be operationally, financially or environmentally viable, but perhaps might still represent an extreme action of absolute last resort. Norway is a very expensive country to do business in, and a nice attractive place to visit for those checking this idea out. This respondent does not have a problem with SW looking into this idea provided it doesn't distract SW or draw away key personnel from progressing and implementing the more obvious solutions"	We thank you for your feedback and note your qualified support for the option. The water resources we have identified in Norway is used for hydroelectric power generation. We will be working to resolve the technical, logistical and commercial challenges associated with the option.
WRMPSV47	If Southern Water is forced to stop using drought orders and permits, tankered water from Norway should still be considered as an alternative to T2ST plus SESRO, bearing in mind how rarely this would be needed.	We thank Garford Parish Meeting for reviewing our plan and providing feedback. We note the qualified support for this option.
WRMPSV56	Although Vale of White Horse District Council recognises the need to preserve, protect and enhance the River Test, we cannot support a scheme that temporarily imports water from Norway. Our council believes that the use of drought orders and permits, while not ideal, is still a more acceptable solution than transporting water from Scandinavia.	We thank South Oxfordshire and Vale of White Horse District Council for its feedback and note its opposition to the sea tankering option.
WRMPSV59	We also question that this proposal be put in such a way that it implies that saving water levels in the river Test is dependant on this. We are a country where it rains a lot, and our winters are getting much wetter. We need to collect and store this water. There must be water saving alternatives. Importing water from another country seems an extraordinary option. The carbon and energy costs would be very high and it would yet again increase customer bills significantly. This is not a sustainable solution. Moreover, there are likely to be additional complications. For instance, would berths for these tankers be readily available at the right time? We understand that there is a six week notice period needed for a berth at Southampton. If such water is stored before distribution, would it pose a threat to biosecurity?	We thank the Arun and Chichester Green Party for its feedback and note its opposition to the option. This option is proposed to be used on in the event of a drought between 2030 and 2034. There are technical, commercial and logistical challenges that will need to be addressed before this option can be implemented.
WRMPSV61	This proposed measure relates to the Hampshire area, and we therefore have no comment to make on this question."	We thank the Wealden District Council for providing feedback and note its response.
WRMPSV64	This should be an option of last resort. It needs to be planned thoroughly, with robust trigger points, to ensure that customers money is not wasted. There also needs to be strict controls on how it is stored, how it is processed and where it is released back into the environment.	We thank Southampton City Council for its feedback and agree that this option needs to be investigated thoroughly.
WRMPSV71	If Southern Water is forced to stop using drought orders and permits, tankered water from Norway should still be considered as an alternative to T2ST plus SESRO, bearing in mind how rarely this would be needed (see Section 6.4 of response report).	We thank GARD for its feedback and note its qualified support for the option.
WRMPSV72	I have already given my view on drought orders and the targets set, which I believe are over onerous.	We thank you for your feedback and note your opposition to this option.

Reference	Comment	Southern Water response
WRMPSV73	We thank you for your feedback and note your opposition to this option.	We thank you for your feedback and note your opposition to this option.
WRMPSV99	No this idea is preposterous. The carbon and energy costs would be very high and it would yet again increase customer bills significantly. In addition there are likely to be complications eg.if such water is stored before distribution, would it be a threat to biosecurity?	We thank you for your feedback and note your opposition to this option.

2.1.8 Question 8: Desalinating seawater for drinking water supply

Our plan includes four schemes after 2035 to provide drinking water by removing salt (desalination) from sea water in Sussex and Kent in order to improve resilience and reduce the amount of water we take from rivers and groundwater during droughts. Question 8 asked whether the use of desalination is supported.

64% of the supported building of desalination plants for public water supply. 27% 28% opposed it and the remaining were either unsure or did not provide a response (Figure 8).

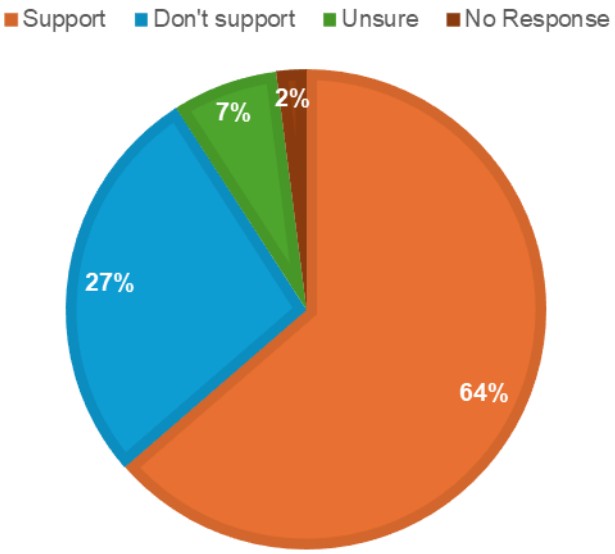

Figure 8: Breakdown of responses to question 8.

Additional comments provided in response to question 8 and our responses to them are given in Table 9.

Table 9: Additional comments on question 8 and our responses.

Reference	Comment	Southern Water response
WRMPSV43	Steventon Parish Council supports the use of desalination as a genuinely resilient source of supply that is not affected by climate change. As the electricity grid becomes de-carbonised, the carbon impacts of desalination will be much reduced. The 75 Ml/d [redacted] desalination scheme, which was in Southern Water's Defra-approved preferred plan in 2019, should not have been abandoned without a detailed and transparent justification, including a comparison with the costs and environmental impacts of the T2ST plus SESRO option.	We thank Steventon Parish Council for the feedback and note its support for the use of desalination for public water supply purposes. The proposal desalination scheme on the West Southampton coast and the alternatives were subject to a detailed assessment and consultation (Water_for_Life_consultation_brochure_2021). Our assessment of the desalination option suggested that it was not deliverable at the proposed site at the present time. The Quantitative Solution Risk Analysis carried out as part of the process showed water recycling and water transfers to be preferrable over desalination in Hampshire.
WRMPSV44	Desalination should be regarded as an absolute, absolute, last resort and only after all other options and strategies have been fully deployed and utilized. Desalination presents huge environmental, operational and cost implications and should only be considered when more sustainable and proven technology is available to significantly reduce its energy requirement and handling of the resulting waste without environment consequence. But with the UKs rainfall why on earth would we want to consider desalination?	We thank you for your feedback and note your opposition to use of desalination for public water supply until more efficient technologies are available to reduce power consumption and environmental impacts. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment.
WRMPSV46	Desalination is widely known to be an energy-intensive process which can have detrimental impacts to the environment. The RSPB have concerns that there are 4 remaining desalination schemes in the revised draft, 3 of which are located in Kent. All three of these proposed desalination sites in Kent – Isle of Sheppey, East Thanet and the Thanet Estuary have the potential to impact international designated coastal / marine sites (Ramsars, Special Protection Areas and Special Areas for Conservation) adjacent to or within close proximity. Changes in salinity, temperature and toxicity associated with desalination could impact benthic communities and the wildlife that relies on these due to the sensitive nature of these locations. It is critical that if desalination must be considered the location is key to avoid and minimise impacts on the environment. The high carbon emissions associated with these large-scale desalination plants and the impacts of desalination on coastal and marine habitats, especially in sensitive areas such as wetlands, estuaries, and marine protected areas means this should only be considered as an absolute last resort. Desalination schemes should be particularly avoided where they are likely to impact designated sites. Particularly in these areas, we strongly urge that other options for meeting water demands are explored. If desalination schemes have to be pursued, they should be implemented in a way that minimises environmental harm, such as by using renewable energy, adopting sustainable brine disposal methods, and ensuring the protection of sensitive habitats. The RSPB would also stress that desalination should be part of a holistic, sustainable approach to water management, rather than being relied upon as a primary solution.	We thank the RSPB for taking the time to review our plan and provide feedback. We note the concerns expressed by RSPB regarding desalination. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment. We acknowledge that desalination is an energy, and consequently, carbon intensive process and there are multiple environmental factors to consider in planning and building and desalination plant at a particular site. We have submitted a research proposal to Ofwat (Brine Recovery and Innovative Development for a Green Economy - BRIDGE), with Anglian Water and Irish Water as collaborative partners, to investigate improved ways of dealing with brine that results from desalination and water recycling.

Reference	Comment	Southern Water response
WRMPSV47	Garford Parish Meeting supports the use of desalination as a genuinely resilient source of supply that is not affected by climate change. As the electricity grid becomes de-carbonised, the carbon impacts of desalination will be much reduced. The 75 Ml/d [redacted] desalination scheme, which was in Southern Water's Defra-approved preferred plan in 2019, should not have been abandoned without a detailed and transparent justification, including a comparison with the costs and environmental impacts of the T2ST plus SESRO option.	We thank Garford Parish Meeting for the feedback and note its support for the use of desalination for public water supply purposes. The proposal desalination scheme on the West Southampton coast and the alternatives were subject to a detailed assessment and consultation (Water_for_Life_consultation_brochure_2021). Our assessment of the desalination option suggested that it was not deliverable at the proposed site at the present time. The Quantitative Solution Risk Analysis carried out as part of the process showed water recycling and water transfers to be preferrable over desalination in Hampshire.
WRMPSV56	Southern Water's WRMP suggests desalination offers an effective solution for addressing water resilience issues during periods of prolonged drought/low rainfall. Desalination plants can also be expanded to provide a greater degree of flexibility if additional water resources are required. Furthermore, with the continued decarbonisation of the UK's electricity system there are fewer concerns about the energy intensive nature of the process. We are, however, concerned about the potential impacts of desalination upon the marine environment. Safeguards would have to be put in place to ensure that the use of desalination did not have a retrograde impact on the marine environment.	We thank South Oxfordshire and Vale of White Horse District Council for its feedback. We note that the Council is generally supportive of desalination but would like safeguards in place for environmental protection. We agree with the Council that for desalination to be viable at a given location, the potential environment impacts will need to be appropriately addressed.
WRMPSV57	Sussex Wildlife Trust recognises the need to reduce the amount of water taken from the environment. Whilst the absolute priority should be ambitious demand-side measures, we acknowledge that there will still be a need for new schemes to meet the supply shortfall. Sussex Wildlife Trust supports the use of supply side options that are the least environmentally harmful and, ideally, where benefits to the environment can be delivered. We previously raised concerns about the use of desalination, which is energy intensive, costly to operate and likely to have significant environmental impacts on the marine environment. The most significant of these impacts is the release of brine effluent into the coastal environment and the consequent acute and chronic toxic effects on marine organisms. SWT also has concerns about potential dilution mechanisms used for brine effluent, with regards to the source of dilution solutions and the impacts of these solutions on water quality when released. We also note the potentially destructive impacts of the suction pipes delivering water to the proposed desalination plants, which have been estimated to kill billions of fish annually and are a particular risk for larval stages of aquatic fauna.e We note that desalination on the Sussex coast is no longer an option, with an alternative proposal for desalination on the tidal River Arun delayed to 2037-38 (at the earliest) to allow additional time for investigation and mitigation options. This delay is welcome, considering the environmental risks associated with desalination and the further work required to fully understand the ecological impacts. Sussex Wildlife Trust would expect to see a thorough and robust evidence-based assessment of impacts, risks and mitigation options to determine whether this approach is feasible, and firm commitments to ensure that proposals would not adversely impact the natural environment and would contribute to nature's recovery. Overall,	We thank Sussex Wildlife Trust for taking the time to review our plan and provide feedback. Our have an ambitious demand management plan and as part of the plan we will be exploring options that will deliver either greater benefits and/or deliver them earlier. This includes exploring options that may not be in our current plan. However, demand management by itself will not be sufficient to address the supply-demand balance challenges we face. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment. We acknowledge that desalination is an energy, and consequently, carbon intensive process and there are multiple environmental factors to consider in planning and building and desalination plant at a particular site. We have submitted a research proposal to Ofwat (Brine Recovery and Innovative Development for a Green Economy - BRIDGE), with Anglian Water and Irish Water as collaborative partners, to investigate improved ways of dealing with brine that results from desalination and water recycling.

Reference	Comment	Southern Water response
	we have the same concerns regarding the impacts of brine effluent and the use of suction pipes on the estuary.	
WRMPSV59	This is yet another high carbon, unsustainable and expensive solution, and we believe it has already been rejected in the previous incarnation of this plan. According to SW it as the highest carbon footprint of all their solutions, about 83 times as high as groundwater options! Capturing and storing more water in the winter months seems the logical and most sustainable way to improve water supply and resilience to droughts.	We thank the Chichester and Arun Green Party for its feedback and note its opposition to desalination. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment.
WRMPSV61	This proposed measure is supported in principle, subject to there being no overriding environmental impacts.	We thank Wealden District Council for the feedback and note its support for desalination subject to any environmental impacts being adequately addressed.
WRMPSV64	Desalination is a highly energy intensive activity and abstraction of water from the marine environment poses a risk to marine ecosystems. The concentrated salt waste by product needs to be dealt with appropriately. Create an expensive storage legacy which is an additional financial burden on customers.	We thank Southampton City Council for the feedback and note its opposition to desalination.
WRMPSV71	GARD supports the use of desalination as a genuinely resilient source of supply that is not affected by climate change. As the electricity grid becomes de-carbonised, the carbon impacts of desalination will be much reduced. The 75 Ml/d [redacted] desalination scheme, which was in Southern Water's Defra-approved preferred plan in 2019, should not have been abandoned without a detailed and transparent justification, including a comparison with the costs and environmental impacts of the T2ST plus SESRO option (see Section 6.3 of response report).	We thank GARD for providing feedback and note its support for desalination. The proposal desalination scheme on the West Southampton coast and the alternatives were subject to a detailed assessment and consultation (Water_for_Life_consultation_brochure_2021). Our assessment of the desalination option suggested that it was not deliverable at the proposed site at the present time. The Quantitative Solution Risk Analysis carried out as part of the process showed water recycling and water transfers to be preferrable over desalination in Hampshire.
WRMPSV72	Desalination, which uses the same reverse osmosis process as WW recycling, is even more expensive to run and more energy intensive. It produces an unacceptable brine output into the sea; which is, I understand, particularly a problem in shellfish areas such as the Solent and the north Kent coast where some desalination plants are proposed.	We thank you for your feedback and note your opposition to desalination.
WRMPSV73	No. Desalination, which uses the same reverse osmosis process as WW recycling, is even more expensive to run and more energy intensive. It produces an unacceptable brine output into the sea; which is, I understand, particularly a problem in shellfish areas such as the Solent and the north Kent coast where some desalination plants are proposed.	We thank you for your feedback and note your opposition to desalination.
WRMPSV99	This is yet another high carbon, unsustainable and expensive solution, which I thought was already rejected in a previous incarnation of this plan. According to SW it is the highest carbon footprint of all their solutions, 2 about 83 times as high as groundwater options! Capturing and storing more water in the winter months seems the most logical and sustainable way to improve water supply and resilience to droughts.	We thank you for your feedback and note your opposition to desalination. We have excluded the desalination option on the West Southampton coast that was included in our WRMP19. However, we have ruled out desalination completely as a viable option for public water supply.

2.1.9 Question 9: Use of recycled water for drinking supplies

We plan to use cutting-edge technology to produce drinking water by treating wastewater to very high standards (water recycling). The water will be either discharged into a river or temporary storage for before being put into supply after further treatment . Water recycling can provide a resilient water supply, including during severe, prolonged droughts. Our plan includes four water recycling schemes by 2035. Three more recycling schemes are included for later years.

Question 9 asked whether the use of recycled water for public supply is supported.

48% of the respondents supported it while 36% opposed it. The remaining were either unsure or did not provide a response (Figure 9).

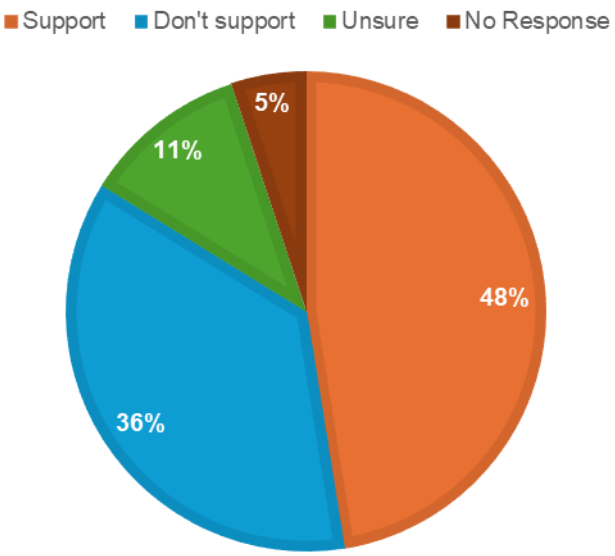

Figure 9: Breakdown of responses to question 9.

Additional comments provided in response to question 9 and our responses to them are given in Table 10.

Table 10: Additional comments on question 9 and our responses.

Reference	Comment	Southern Water response
WRMPSV43	Steventon Parish Council strongly supports the water recycling schemes and the planned scheme for reuse of Portsmouth's STW effluent, in conjunction with Havant Thicket reservoir. As for desalination, this is a genuinely climate change resilient option. The planned Havant Thicket/wastewater recycling scheme, delivering 60-90 Ml/d, is sufficient to meet all the future water supply needs in the Southampton and Portsmouth area. Provided its operating rules prioritise environmental benefits not cost saving, it will also allow early and substantial abstraction reductions in the Rivers Itchen, Test and other chalk streams at all times, not just in severe droughts like the T2ST. The scheme will be complete in the early 2030s, 5-10years before the T2ST and SESRO.	We thank Steventon Parish Council for the feedback and note its support for the use of water recycling schemes for public water supply purposes.
WRMPSV44	Not until all the other options / solutions have been fully explored and implemented. Better to expend energy and effort fixing leaks which SW could certainly do a lot better, educating and disciplining consumers, building more reservoirs, recharge aquifers, build underground storage and integrate these into developments and moving abstraction and discharge locations. These should all be done first and only then should we consider recycling for human consumption. Wastewater reverse osmosis recycling should strictly be a final solution, and only to be developed and implemented under strict discipline and supervision of Defra / EA or preferably a reliable independent entity. Unfortunately, SW's track record of treatment failures at works at conventional water treatment works (and perhaps also Defra/EA's track record) show they have a long way to go to regain consumer trust and therefore it cannot be allowed to go forward unless it is under very close supervision and monitoring by qualified experts in this field. If indeed this were to go forward, then its wastewater byproducts (liquid or solids) from microfilters and reverse osmosis should be fully land-based treated and not discharged into any waterway (river, sea, or harbour) as appears suggested in this and earlier proposal documents. This respondent is familiar with the technology and it should be deployed only when it becomes absolutely necessary as a final solution and only if done properly and reliably, and at this stage could not really be considered a best value solution. Again, where in the consultation material are the cost / benefit detailed analysis for the various options and proposals being put forward and of their supply and environmental assessments? How does anyone know wastewater recycling is the	We thank you for your feedback and note your opposition to use of water recycling for public water supply unless it is the option of last resort and does not include any effluent discharge into rivers or sea.

Reference	Comment	Southern Water response
	way forward if SW have not even finished their environmental and pilot purification efficacy studies, and the pilot results to date are known to be incomplete and far from satisfactory. Another likely unacceptable aspect of the proposed recycling strategy at Havant is the deep tunnel shafts needed through an old and likely contaminated landfill site which was used pre-records and therefore whatever is down there is totally unknown. Has this been adequately investigated and what research if any has been conducted to find a more suitable location?	
WRMPSV46	We welcome measures to ensure that less water is being taken from sensitive environments such the chalk rivers at the River Test and River Itchen and to ensure greater climate resilience. However, any new infrastructure should be located and designed to ensure that it will not impact other sensitive or important habitats and every opportunity is taken to maximise building in benefits for nature. RSPB are of the opinion that water recycling has less potential for environmental harm than water desalination. Therefore, if one or the other must be considered, after all efforts have been made to reduce leakage and demand, than we believe water recycling is likely the better option. However, we would like to be consulted on any plans or projects for additional water supply, and it will be essential to ensure that damage to designated sites is avoided, and any other damage to nature is avoided or mitigated.	We thank the RSPB for taking the time to review our plan and provide feedback. We note RSPB's preference for water recycling over desalination. All our water recycling plants will go through public consultation and we would welcome RSPB's input.
WRMPSV47	Garford Parish Meeting strongly supports the water recycling schemes and the planned scheme for reuse of Portsmouth's STW effluent, in conjunction with Havant Thicket reservoir. As for desalination, this is a genuinely climate change resilient option. The planned Havant Thicket/wastewater recycling scheme, delivering 60-90 Ml/d, is sufficient to meet all the future water supply needs in the Southampton and Portsmouth area. Provided its operating rules prioritise environmental benefits not cost saving, it will also allow early and substantial abstraction reductions in the Rivers Itchen, Test and other chalk streams at all times, not just in severe droughts like the T2ST. The scheme will be complete in the early 2030s, 10years before the T2ST and SESRO.	We thank Garford Parish Meeting for the feedback and note its support for the use of water recycling for public water supply purposes.
WRMPSV56	We support the use of recycled water for public supply. It is a resilient, flexible way of increasing water supplies as demand grows. As Southern Water's WRMP shows, the delivery of four water recycling schemes by 2035 could boost supplies	We thank South Oxfordshire and Vale of White Horse District Council for its feedback and note its support for water recycling for public water supply purposes.

Reference	Comment	Southern Water response
	by up to 127 million litres per day – with the potential for further projects going forwards.	
WRMPSV57	Sussex Wildlife Trust recognises the need to reduce the amount of water taken from the environment. Whilst the absolute priority should be ambitious demand-side measures, we acknowledges that there will still be a need for new schemes to meet the supply shortfall. Sussex Wildlife Trust supports the use of supply side options that are the least environmentally harmful and, ideally, where benefits to the environment can be delivered. Water recycling could be an essential component of a suite of measures needed to reduce the amount of water taken from the environment and improve resilience to drought, but it must be accompanied by a robust ecological risk assessment and contribute to nature's recovery. We are particularly concerned about the potential impacts of any reject water being released into the environment, along with the high carbon footprint of schemes.	We thank Sussex Wildlife Trust for providing feedback and note its support for water recycling subject to sufficient safeguards against ecological impact and contribution to nature's recovery.
WRMPSV59	This is another expensive, high carbon solution as can be seen in SW's table reproduced above. SW acknowledge that they are one of the highest energy users in the South east and that the carbon embedded in their proposed infrastructure will increase their carbon costs even further. While the carbon costs for recycling will be lower than those for desalination, they will still be very high. To mitigate their operational carbon costs SW propose using renewable energy tariffs and onsite generation. We welcome both these moves, but questions about the actual carbon costs remain. As we electrify more and more of our economy there are doubts as to whether we have the capacity to meet this increasing demand. So, while SW plan to use and pay for renewable energy it is possible that these high energy demanding plans end up being forced to use electricity generated by gas. This emphasises the importance of considering low energy solutions first. It is not only important in terms of these particular plans, but also in terms of national energy supplies and energy security. We do note that SW cite additional measures to achieve their net zero plans , but again we question the effectiveness of some of these. We welcome their measures to generate electricity on their own estates and also their commitment to employ nature-based solutions. However, it seems to us that their "efficiency savings" are likely to be outstripped by the energy demands of these plans. We understand their readiness to adopt "alternative solutions and technology change", but we consider any reliance of these is risky. For instance, the report describes hydrogen as a "green fuel", yet national plans for hydrogen production rely heavily on the	We thank the Chichester and Arun Green Party for its feedback and note its opposition to water recycling. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment.

Reference	Comment	Southern Water response
	production of “blue” hydrogen. This uses gas as a feedstock, (and much of this is likely to be imported LNG) relies on technology that is yet unproven at scale and has research which shows that it is likely to lead to more emissions rather than fewer. The strategy to “Offset any residual emissions, where there is no alternative solution in the short term, through the se of responsible carbon offsetting” is also subject to doubt.ss It is becoming increasingly clear that carbon off-setting often fails to actually reduce emissions and success in doing this “responsibly” and effectively is unlikely Moreover, whatever the source of energy, it still has to be paid for by the customers. We understand that the energy costs just for the treatment and pumping recycled water the Havant reservoir alone would cost in the region £3 million a year. Added to this, for just Hampshire, would be the cost (and disruption) of building the water recycling plant, three new pumping stations, and four additional pipelines. We understand that all this costs in the region of £1.2 billion. On top of this is the £350 million costs of the Havant reservoir itself. Surely building more reservoirs is a cheaper, more sustainable and a longer-lasting solution?	
WRMPSV61	This proposed measure is supported in principle, subject to there being no overriding environmental impacts. WDC understands that the recycling of water is being considered in the [redacted] Wastewater Treatment Works (WwTW) over the long term, with the potential for piping water to a future extension/additional reservoir at the Arlington Reservoir site in order to provide increased water quantity when required for the local area. The creation of piping to deliver this will inevitably have environmental impacts but would need to be justified based on the economic and wider gains from delivering this piece of infrastructure. As part of WDCs emerging Local Plan (published at the Regulation 18 stage, March 2024), the Council did publish a draft planning policy on safeguarding infrastructure (INF5: Safeguarding of Infrastructure) The South East Water WRMP identifies the extension of the Arlington Reservoir in the 2025 to 2045 timeframe to assist in addressing the projected increased shortfall for the water supply-demand balance. For this reason, the Council will seek to safeguard the land to enable this project to be brought forward.	We thank Wealden District Council for the feedback and note its support for desalination subject to any environmental impacts being adequately addressed. We also note the Council’s commenting regarding the proposed water recycling plant at Brighton Wastewater Treatment Works and transfer of treated water to Southern East Water’s reservoir.
WRMPSV64	However, there is likely to be anxiety amongst consumers regarding the safety of the drinking water. Information about water recycling, including the processing	We thank Southampton City Council for the feedback and note its support for water recycling.

Reference	Comment	Southern Water response
	measures that it will be subject to, needs to be readily available to generate consumer confidence	We agree with the Council that any concerns that the consumers may have about water quality will need be addressed.
WRMPSV71	GARD strongly supports the water recycling schemes and the planned scheme for reuse of Portsmouth's STW effluent, in conjunction with Havant Thicket reservoir. As for desalination, this is a genuinely climate change resilient option (see Sections 3.2, 3.3 and 4.4 of response report). The planned Havant Thicket/wastewater recycling scheme, delivering 60-90 Ml/d, is sufficient to meet all the future water supply needs in the Southampton and Portsmouth area (see Section 3.1.3 and 3.2 of response report). Provided its operating rules prioritise environmental benefits rather than cost saving, it will also allow early and substantial abstraction reductions in the Rivers Itchen, Test and other chalk streams at all times. The scheme will be complete in the early 2030s, 5-10years before the T2ST and SESRO.	We thank GARD for providing feedback and note its support for water recycling.
WRMPSV72	No for the various reasons set out above and that this is a premature solution until more certainty is available for forward projections. On the Isle of Wight the risk of upsetting the ecology of the relatively small Eastern River Yar for 'blending' is high. Maybe by 2050 such processes may be needed. When all natural storage and man-made storage has been developed, proper incentivized repair and renewal is working and demand is better managed it will be the adaptive pathway that emerges through regular monitoring and review; but until then these other options have not been explored or developed enough and there may well be other solutions in 30 years' time that have been developed.	We thank you for your feedback and note your opposition to water recycling, at least in the short term.
WRMPSV73	No, for the various reasons set out above. In my view it is a premature solution until more certainty is available for forward projections. On the Isle of Wight the risk of upsetting the ecology of the relatively small Eastern River Yar for 'blending' is very high. Maybe by 2050 such processes could be needed. When all natural storage and man-made storage has been developed, proper incentivized repair and renewal is working and demand is better managed it will be the adaptive pathway that emerges through regular monitoring and review; but until then these other options have not been explored or developed sufficiently and there may well be other solutions in 30 years' time that have been developed.	We thank you for your feedback and note your opposition to water recycling, at least in the short term.
WRMPSV99	This is another expensive, high carbon solution as can be seen in SW's table reproduced above. SW acknowledge that they are one of the highest energy users	We thank you for your feedback and note your opposition to desalination. We also note your comments about our net zero plan.

Reference	Comment	Southern Water response
	in the South east and that the carbon embedded in their proposed infrastructure will increase their carbon costs even further. While the carbon costs for recycling will be lower than those for desalination, they will still be very high. To mitigate their operational carbon costs SW propose using renewable energy tariffs and onsite generation As we electrify more of our economy there are doubts as to whether the capacity exists to meet this increasing demand. So, while SW plan to use and pay for renewable energy it is possible that these high energy demanding plans end up being forced to use electricity generated by gas This emphasises the importance of considering low energy solutions first. It is not only important in terms of these particular plans, but also in terms of national energy supplies and energy security. We do note that SW cite additional measures to achieve their net zero plans, but again we question the effectiveness of some of these. We welcome their measures to generate electricity on their own estates and also their commitment to employ nature-based solutions. However, it seems that their “efficiency savings” are likely to be outstripped by the energy demands of these plans. We understand their readiness to adopt “alternative solutions and technology change”, but any reliance on these is risky. For instance, the report describes hydrogen as a “green fuel”, yet national plans for hydrogen production rely heavily on the production of “blue” hydrogen. This uses gas as a feedstock, relies on technology that is yet unproven at scale and has research which shows that it is likely to lead to more emissions rather than fewer The strategy to “Offset any residual emissions, where there is no alternative solution in the short term, through the use of responsible carbon offsetting” is also subject to doubt. It is becoming increasingly clear that carbon off-setting often fails to actually reduce emissions and success in doing this “responsibly” and effectively is unlikely. Moreover, whatever the source of energy, it still has to be paid for by the customers. We understand that the energy costs just for the treatment and pumping recycled water the Havant reservoir alone would cost in the region £3 million a year. Added to this would be the cost (and disruption) of building the water recycling plant, three new pumping stations, and four additional pipelines. We understand that all this costs in the region of £1.2 billion. On top of this is the £350	

Reference	Comment	Southern Water response
	million costs of the Havant reservoir itself. Surely building more reservoirs is a cheaper, more sustainable and long-lasting solution?	

2.1.10 Question 10: Further comments on our plan

The final survey question invited any further comments on our plan. The additional feedback and our responses to them are provided in Table 11.

Table 11: Feedback as part of question 10 and our responses.

Reference	Comment	Southern Water response
WRMPSV01	I think your questions should allow more comment from individuals. Difficult to say at this point. I need to read your report more thoroughly.	We thank Brighton and Hove Council for taking the time to review our plan and provide feedback. We note the comment. The survey questionnaire allowed respondents to provide any additional feedback. There was also the option of emailing or writing to Defra to make representations on our plan.
WRMPSV02	More ambition needed on plan to address leakage.	We thank Brighton and Hove Council for taking the time to review our plan and provide feedback. The leakage reduction target set by the Government is 50% by 2050. Our planned reduction of 53% by 2050 exceeds the target set by the Government. Our leakage target is based on savings that can realistically be achieved with existing technologies. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.
WRMPSV03	Recycled water should not be used for public consumption, this will encourage people to buy more bottled water and increase environmental damage. Recycled water uses vast amounts of energy all year, this is not a way forward. We get plenty of rainfall in Hampshire, we need to take measures to store this water properly, reduce consumption, reduce leaks and wasted water rather than recycle water.	We thank you for taking the time to review our plan and provide feedback. We have an ambitious demand management programme and plan to exceed the targets set by the Government to reduce leakage and consumption. Demand management alone will however not be enough to meet the future supply-demand balance challenges. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment. We will use industry leading technology and best practice to ensure the water produced from water recycling meet the strict UK drinking water standards.
WRMPSV05	By using a forest will be better in the future plans	We thank for your feedback but do not follow it.
WRMPSV06	I feel that the plan should go further looking to support innovative water sources and management. This should include progress on dual pipe systems and reuse options. Additionally I feel that there should be greater clarification as to how water resources will be supplied to the SNZ as they come on line as it is not clear how they will be allocated.	We thank you for taking the time to review our plan and provide feedback. Dual supplies should be explored in new developments as they would allow used for bathing, flushing etc. to be recycled and reuse. This would reduce the demand for potable water However, this is not something we can implement as a water supplier. Typically, all customers in a WRZ is supplied by water produced in that WRZ. In the event of a deficit, water can be imported from a neighbouring WRZ or water company. In the case of a surplus it can either be exported to neighbouring that may need it or the production is reduced in line with the demand.

Reference	Comment	Southern Water response
WRMPSV07	I recognise the need for the fastest possible action to protect the Test and the Itchen . Our chalkstreams are incredible important. I would prefer to see more managed aquifer recharge if it were possible I the timescale and small reservoirs as alternatives to tinkering I. Water from Norway or effluent recycling…. It is really important to avoid carbon intensive measures where we can and ideally reducing consumption and fixing leaks ought to be the quicker and most cost effective ways to protect our rivers and water supplies. However, we might run out of time in negotiating sites for some of the least environmentally damaging solutions, and I fear that we reluctantly have to accept that the effluent Recycling option is nearer delivery than some of the less carbon intensive options…. It seems opportunities to solve this without building huge infrastructure has been missed and we are where we are…. But let's prioritise our chalkstreams and try to avoid carbon intensive building and tinkering wherever possible.	Thank you for taking the time to review our plan and provide feedback. We agree that we need to protect our chalk streams. Our plan includes a Managed Aquifer Recharge (MAR) scheme in Hampshire. MAR and Aquifer Storage and Recovery (ASR) schemes specific geological, hydrogeological/hydrological conditions to be viable. Annex 8 that accompanied our SoR following consultation on our dWRMP24 described the MAR/ASR schemes we have considered in the past. We will reassess them for our next plan. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment.
WRMPSV08	First fix the leaks, to help with this: - slowly over time replace all pipes over 35 year please. Southern Water is on track to meet our five-year target (who set the target? o yes you!) (+ how did you do over the privets 5,10,15,20 year target?) This one is for reducing leakage by two million litres a day to a total of OMG 86 million litres a day. Then with no costings in place how do you plan get to 75 million litres a day in 9 year time? With say 70m people in the UK that 1 liter each per day, how + where is the investment coming from? : - During 2016, (You call this up to date info please this is 8.5 year old and not the full picture) we identified and repaired more than 20,000 leaks on our network. How many leaks did you not identified and not repaired, or how many leaks per year are you having? If you have fix 20,000 BUT have 30,000 per year you will never fix the problem. (Over half (say 52 -48%) of these were found and addressed proactively by our leakage team.) With more than 120 people in Southern Water's leakage team in place, so that could be 121 then. So three rotors of 8h with 40 workers per shift for the tote network,13,700-kilometre network. So 300 Km per worker? How much new pipes Km per year are you fitting & with a work force of ? how many people? How much money are your shareholders/owners/pear ant companies going to put in? Last we the public heard was Thames Water ask there shareholders but they said No Money! In the UK we have a 10 year uk census this tell you of population growth in each water arear. This info can be use by you to put plans in place to make new reservoirs, JIT or put off till tomorrow will not work today, these need to be in place before catastrophe happens. Not forgetting climate change. Also with the net 600, 700 thousand new workers per year coming here to work, you are very lucky as the news about birth rate in now down to 1.4 children per lady. Male fertility the issue attracted media attention after a 2017 meta-analysis found that sperm counts had declined by 52.4 percent between 1973 and 2011.	Thank you for taking the time to review our plan and provide feedback. – The leakage target of reduction by 50% by 2050 has been set by the Government. We plan to reduce leakage by 53% by 2050 and it includes a mains replacement programme that will increase from replacing 20km of mains from 2026 to 200km of pipe per year by 2035. The cost for reducing leakage are included in our plan and were submitted to Ofwat as part of our 2025-30 Business Plan. – We provided up to date information on our leakage in Section 3.1.2 in our rdWRMP24 Technical Report as well as the accompanying Annex 14. We believe your quoting the 2016 from an older report. We commissioned an independent consultant to provide growth forecasts up to 2100. These projections have been used inform future planning.

Reference	Comment	Southern Water response
WRMPSV09	I am encouraged to see the plan to reduce extraction from the environment which I see as a massive priority - please don't give up on this	Thank you for taking the time to review our plan and provide feedback. We are pleased to note that you support our aim to protect and enhance the environment.
WRMPSV10	All things that you should have been doing in the last 30 years but instead profits came first along with employee bonuses.	Thank you for taking the time to review our plan and provide feedback. Our dividends and executive pay are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest. Southern Water is not making a profit, and has actually registered losses in the last two accounting years, as we invest more in our networks than we previously pledged to.
WRMPSV11	Totally against recycled water. Not a safe solution. Totally unacceptable.	Thank you for taking the time to review our plan and provide feedback. We will use latest technology and follow best practice in recycling water. The water we put into supply with meet strict UK drinking water standards.
WRMPSV12	You need to work even more closely with the Environment Agency, South Downs Authority and local conservation and amenity groups to balance demand, supply and environmental protection.	Thank you for taking the time to review our plan and provide feedback. The Environment Agency is one of our regulators and we work closely with it. We are collaborating with a number of stakeholders across our supply area and will be happy to work the South Downs Authority.
WRMPSV13	Demand for water needs urgently to be reduced. But this critical topic gets only very lukewarm mention in your papers.	Thank you for taking the time to review our plan and provide feedback. Demand management is a key priority for us and our targets for reducing leakage and consumption exceed the targets set by the Government. Annex 14 to our rdWRMP24 Technical Report described our demand management strategy in detail.
WRMPSV14	I think drinking recycled water with chemicals, medications and hormones is dangerous and quite frankly disgusting. I do not want to drink other people piss. I pay for my water and I should be able to use whatever I pay for. I do not want my water use limited. Stop building houses in the South of the resources cannot support them.	Thank you for taking the time to review our plan and provide feedback. We will use latest technology and follow best practice in recycling water. The water we put into supply with meet strict UK drinking water standards. Water is a finite resource and we need to use it efficiently to ensure there is enough for both our current and future customers. Southern Water has no control over housebuilding rates across its supply area.
WRMPSV15	The plan needs to be a lot stronger on environmental protections and putting in place much firmer measures against climate change.	Thank you for taking the time to review our plan and provide feedback. We have considered the impact of climate change in planning for the future. We will be reducing the amount of water we take from a number of our existing sources over time in order to protect and enhance the environment.

Reference	Comment	Southern Water response
WRMPSV16	Strongly object to the use of recycled water for potable supply. How are you able to guarantee the removal of highly soluble substances contained in waste water, e.g. hormonal products from the use of contraceptives, drugs and pharmaceutical contaminants. What is your proposed treatment method, does it include reverse osmosis?	Thank you for taking the time to review our plan and provide feedback. We will use latest technology and follow best practice in recycling water. The water we put into supply with meet strict UK drinking water standards. We refer you to our dedicated web page (Hampshire Water Transfer And Recycling Project) for more information on our water recycling project in Hampshire.
WRMPSV17	Your plans are behind the times with all the building going on in the Shoreham area. So how will this be achieved with no back up plan with the area? And how is it going to run with the age of the existing infrastructure? With new plan for more development in the future.	Thank you for taking the time to review our plan and provide feedback. Our forecast of future demand for water considers growth and includes all growth planned and approved by local planning authorities in our supply area.
WRMPSV19	I note the statements in Section 4 (page 15) under 'Protect and improve the water	Thank you for taking the time to review our plan and provide feedback. Your comment is noted.
WRMPSV20	The Plans to protect the Test and Itchen should focus on abstracting the water much lower downsream	Thank you for taking the time to review our plan and provide feedback. We have considered moving our abstraction on the River Itchen further downstream. We did consider it be beneficial but we will reassess it for our next plan due to be published in 2029.
WRMPSV21	Too big a risk to our water supply if virus/bugs get through the recycling process. It could make a lot of people very ill. Simple answer is more storage, and better management of existing infrastructure.	Thank you for taking the time to review our plan and provide feedback. We will use latest technology and follow best practice in recycling water. The water we put into supply with meet strict UK drinking water standards.
WRMPSV22	There needs to be more accountability on the public to stop wasting water. More water butts.	Thank you for taking the time to review our plan and provide feedback. As part of our demand management strategy, we will be proactively engaging with our customers to offer held and advice in reducing their consumption.
WRMPSV23	110 l/p/d by 2045 is far too high for 2 decades hence. 90 to 95 l/p/d should be the goal for then.	Thank you for taking the time to review our plan and provide feedback. Average daily consumption of 110 litres person per day by 2045 represents consumption under dry year conditions. This equates to 100 litres per person per day under normal weather conditions.
WRMPSV24	I object to the change of the reservoir from fresh water to treated water. particularly as it will become our drinking water.	Thank you for taking the time to review our plan and provide feedback. Your objection is noted. We will use industry leading technology and best practice to ensure the water produced from water recycling meet the strict UK drinking water standards.
WRMPSV25	Desperately need new reservoirs	Thank you for taking the time to review our plan and provide feedback.

Reference	Comment	Southern Water response
		Our plan includes building three reservoirs over the next 20 years. We will be exploring opportunities for additional reservoirs for our next plan which is due to be published in 2029.
WRMPSV26	The current proposal to recycle sewage and release it into Havant Thicket Reservoir is a badly conceived answer with company profits as the goal. The UK gets plenty of rain and at times it floods. We are not California or Lanzarote with little rain. Desalination and water recycling is energy-intensive and harmful to the environment. Reverse osmosis requires energy and is not a simple procedure. It must be monitored, and no one trusts Southern Water to monitor their treatment. In addition, the process results in a highly concentrated solution of toxicants that Southern Water plans on releasing back into the Solent. While they say it will be released offshore, Southern Water's own imaging of what happens to the offshore releases indicates that some of the releases reach bathing areas.	Thank you for taking the time to review our plan and provide feedback. We note your opposition to discharging recycled wastewater into the Havant Thicket Reservoir. Our area is classified as 'water stressed' by the Government. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment.
WRMPSV27	- A new reservoir at Arlington has been 'talked' about for many, many years, but nothing has happened !! We continue to talk about a water shortage, but Southern Water have not taken any action other than discuss. I appreciate that it does take many years to plan, but still nothing happens !	Thank you for taking the time to review our plan and provide feedback. Our plan includes building three reservoirs over the next 20 years. A reservoir at Arlington is proposed by South East Water. We are unable to comment on its progress
WRMPSV28	I think the highest priority should be given to ensuring old infrastructure is repaired or replaced to reduce or eliminate leaks before you start imposing bans on use.	Thank you for taking the time to review our plan and provide feedback. We plan to reduce leakage by 53% by 2050, which exceeds the 50% reduction target set by the Government. Replace old mains that are susceptible to frequent bursts is a key part of our leakage reduction programme.
WRMPSV29	A. Do not recycle water from sewage works. There are better and more acceptable methods to increase water supply. 1) The Lavant Stream to the West of Langstone has excessive water all year. It is at least 30cm higher than it was 15 years ago. Portsmouth Water had its extraction license reduced in 2008 by 16%. Take more water from this stream all year. 2) Instead of pumping recycled water from [redacted] to the Havant Thicket reservoir, take more fresh spring water from the Hermitage River/Stream and put the recycled water from [redacted] into the Hermitage to replenish the amount extracted. 3) The water table in Havant is very high all year, water bore holes should be a viable option to extract more water.	Thank you for taking the time to review our plan and provide feedback. 1) We cannot take water from the Lavant Stream as it does not fall in our area. 2) The Havant Thicket Reservoir is going to be filled with both spring water and recycled water from Portsmouth Harbour WTW. 3) We cannot drill boreholes in the Havant as it is not in our supply area. We have bulk supply agreements with Portsmouth Water which means that we can get water that is surplus to demand in the Portsmouth Water area.
WRMPSV30	I support building more reservoirs, as they have a long life, are fairly cheap to run, and offer the possibility of leisure facilities for swimming, walking, fishing, and habitats.	Thank you for taking the time to review our plan and provide feedback. Our plan includes building three reservoirs over the next 20 years. We will explore building further storage as part of our 2029 plan.
WRMPSV31	The proposal to recycle waste water to Havant Thicket reservoir is definitely not supported. This will inevitably reintroduce illegal narcotics and medication (e.g. contraceptive drugs) into	Thank you for taking the time to review our plan and provide feedback.

Reference	Comment	Southern Water response
	the water supply. Southern Water's poor record in discharged water contamination (sea pollution) gives no confidence that the proposed filtration will be effective or safe.	Your objection to use of recycled water is noted. We will use latest technology and follow best practice in recycling water. The water we put into supply with meet strict UK drinking water standards.
WRMPSV32	We pay for our water therefore I expect to receive as much water as I require without big brother trying to restrict the amount I use. It is up to you as my supplier to provide this water, even if the cost of supplying it has to rise.	Thank you for taking the time to review our plan and provide feedback. Our area has been classified as 'water stressed' by the Government. Water is a finite resource and we need to use it efficiently to ensure there is enough for both our current and future customers.
WRMPSV33	The proposed costs of the Havant Thicket water filtration scheme should be used to reduce the current high leakage/ wastage rate to improve delivered supply.	Thank you for taking the time to review our plan and provide feedback. We plan to reduce leakage by 53% by 2050 which exceeds the 50% reduction target set by the Government. We need schemes like the Havant Thicket Reservoir, in addition to reducing leakage and consumption, to meet future supply-demand balance challenges.
WRMPSV34	I object to the use of water recycling. i do not understand why we need to use this method when we are spending so much money on a reservoir which by itself was sold as a solution.	Thank you for taking the time to review our plan and provide feedback. Your objection is noted. The reservoir will be filled by a combination of spring water and recycled water.
WRMPSV37	Stop making individual homes life harder and focus on larger water waste solutions. Also sounds like to be able to meet your targets you will be damaging the environment even more, and costing individual households even bigger water bills.	Thank you for taking the time to review our plan and provide feedback. Protecting and, where possible, enhancing the environment is a key objective of our plan.
WRMPSV38	stop the leaks	Thank you for taking the time to review our plan and provide feedback. We plan to reduce leakage by 53% by 2050 which exceeds the 50% reduction target set by the Government.
WRMPSV39	Maidstone Borough Council has the following comments to make relating to water efficiency, water supply and water quality. In making its response the Council has used the following adopted strategies: Maidstone Borough Local Plan Review 2021-2038, Maidstone Biodiversity and Climate Change Strategy, Maidstone Biodiversity and Climate Change Action Plan, and Maidstone Infrastructure Delivery Plan.	We thank Maidstone Borough Council for reviewing our plan and providing feedback.
	Water efficiency The Council supports the reduction of the personal daily usage to 110 litres. In its recently adopted Local Plan Review 2021-2038 (adopted March 2024) the Council adopted policies with this limit within them - (Policy LPRSP14(C) Climate Change & LPRQD1 Sustainable Design).	Water efficiency We are pleased to note the Council's support for the 110 litres per person per day. We would like to point out that this is the target under dry year conditions whey demand is higher than usual. Under normal year conditions i.e. when the average temperature and rainfall are close to long-term average, we advocate a standard for 85 litres per person per day for new builds.
	Water Supply	Water supply

Reference	Comment	Southern Water response
	The Council notes that Southern Water is consulted as part of its Local Plan preparation process as well as on relevant planning applications. The Council is concerned that the response from Southern Water often do not reflect the complexities that are faced with supplying new and existing properties as a result of the levels of growth that are occurring; we would welcome stronger engagement between Southern Water and the Council, including water supply issues, to aid an approach to water resilience among other matters. The Council does not agree with the use of temporary restrictions due to the inconvenience caused to residents as a result. This is supported by the Maidstone Biodiversity and Climate Change Action Plan Action 5.3. The Council feels that the supply of water should be better managed and a greater role for water efficiency be followed to enable sustainable growth. To this end the Council has formulated policies in its Local Plan Review to improve water efficiency as mentioned above. The Council supports the use of water recycling to better support water supply. Within the Maidstone Local Plan Review 2021-2038 Policy LPRSP14(a) Natural Environment criterion 3 seeks new developments to guarantee water supply and minimise damage to groundwater sources. As such if water recycling projects can support this approach, then the Council supports this approach. We are also aware that abstraction of water is becoming more challenging and this likely to continue into the future due to periods of drought and resultant low flows, leading to potential supply risks to Borough residents. This challenge should be reflected within this the WRMP with appropriate resilience measures being put in place to accommodate this.	We note the Council comment about consultation on Local Plan process and have passed it on to relevant teams in Southern Water. Our forecast of future demand for water is based on growth projections which in turn are based on projections in local area plans. Water use restrictions are imposed under drought conditions where there are insufficient supplies to meet demand. The is one of expectations from our regulators before they will consider any applications to increase supplies through drought permits and orders. We are pleased to note the Council's support for water recycling.
	Water quality The Council would like to raise significant concerns that its residents have over water quality caused by wastewater contamination often combined with drought-induced low flows; especially the water pollution caused by misconnections and combined sewage systems overflows. These are pertinent to this supply consultation as the contamination caused by these leads to poorer water quality at abstraction locations. Any proposals taken forward should ensure that water quality and healthy aquatic habitats are maintained. Within the Maidstone Local Plan Review 2021-2038 Policy LPRSP14(a) Natural Environment criterion 3 that seeks to maintain water quality in the Borough.	Water quality We note the Council's concern about wastewater discharges. The steps we are taking to improve our wastewater performance are described in our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)).
WRMPSV40	Stop paying shareholders whilst not improving infrastructure. money grabbing over life. Cut their water, their sewage system. Flood their roads and houses. Hypocrites. Idiots. Water company leaders are Morons couldn't organise a piss up in a brewery unless some posho ordered them.	Thank you for taking the time to review our plan and provide feedback. Our dividends are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest.

Reference	Comment	Southern Water response
WRMPSV41	Although Telscombe Town Council support water restrictions during droughts, there should be tight regulations on how this is approached and those most vulnerable be supported. Southern Water and other water companies need to further reduce leakage, which has historically been under managed. We object to the use of desalination for public supply. This is costly and energy intensive, which harms the environment, assuming fossil fuels are used. We are concerned that desalination plants would not only damage the environment in terms of the energy used but the building of the necessary infrastructure, pipes, etc. The Town Council supports the use and development of grey water. Rainwater off roofs can be put back into the system (e.g. for toilet flushing) instead of going into the drains as wastewater. This could be progressed through new builds. The Town Council feel that water companies should thoroughly investigate this. Another option for recycling water could be the 85 million litres of water that passes through the [redacted] treatment works. Instead of pumping out the clean water to the sea at Friars Bay, could this instead be pumped into Arlington reservoir? Consideration would need to be given for costs, energy use and the environmental impact. It would be helpful if the consultation provided more details about working with neighbouring suppliers, e.g. South East Water, and how Southern Water plans to reduce personal usage of water. Lastly, we feel that Southern Water has a responsibility to ensure that there is regular checking of unlicensed abstraction of water (e.g. from wells), which can also affect the aquifers.	We thank Telscombe Town Council for its feedback. We note the Council's comment about tighter regulations on implementation of water-use restrictions during droughts. Regarding leakage, we plan to reduce it by 53% by 2050 which exceeds the 50% reduction target set by the Government. We note the Council's opposition to use of desalination for public supply. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment. We agree with the Council that grey water recycling in new developments will help reduce demand for potable water. We are happy to work with planning authorities and developers in this regard but as a water supplier, we are unable to enforce it. Our plan includes a joint scheme with South East Water to use recycled water from Brighton WTW and transfer to a reservoir in South East Water's area. A part of this water can be supplied to Southern Water. This scheme is currently selected in the 2060s. The initiatives we plan to introduce in order to reduce per capita consumption were described in Annex 14 to our rdWRMP24 Technical Report. It is beyond our remit as a water supplier to check for any unlicenced abstractions in our supply area. That responsibility for regulating abstractions sits with the Environment Agency.
WRMPSV43	Southern Water's plan fails to consider the strategic water resource impact of exporting water out of the Thames valley, where it is most needed for public supplies and for reducing abstraction in Thames valley chalk streams that are far more heavily abstracted than the Rivers Itchen and Test. The WRMP documentation fails to make clear that the T2ST plus SESRO has been proposed to achieve only an occasional small benefit to the Rivers Test and Itchen and it is not needed to provide resilient public water supplies in times of population growth and climate change. There is no consideration of whether the small benefits to the ecology of the Rivers Test and Itchen justify the impacts of construction of the T2ST plus SESRO on the local communities and environment in the SESRO area and along the pipeline route. There is no consideration of whether it is right to solve a perceived local environmental problem by creating other environmental problems elsewhere. These are topics that should have been raised in the consultation Questionnaire.	We thank the Steventon Parish Council for its feedback. Any exports of water from Thames Water into neighbouring water companies will only take place when there is surplus water to do so. T2ST is not solely dependent on SESRO. It can be supported by Severn Trent to Thames Transfer (STT) as well. While T2ST is a key part of our plans for a resilient water supply system, there is no one-to-one relationship between SESRO and our abstractions from the rivers Test and Itchen. The concept of regional planning is promoted by the Government so that efficient water resources solutions can be developed that benefit an entire region as a whole regardless of water company boundaries.

Reference	Comment	Southern Water response
WRMPSV44	YES. Lots!	Thank you for reviewing our plan and providing feedback.
	(a) The Technical Report and its accompanying available Annex documents omit key critical documents and thereby important information and substance which can only but therefore serve to compromise (perhaps intentionally) anyone trying to make an informed decision on the merits of each solution option being presented in this consultation….. and those that are not. So where is the detailed cost to benefit analysis of build, operational costs, supply benefit and environmental impact for each option in the 257-page consultation materials for each of the possible options? What, if any, ranking or scoring mechanism has been used by SW to determine which strategy should be priority as a best value option(s) in terms cost to build, cost to operate, benefit return on timeline, environmental consequence and its methodology if such a ranking or scoring mechanism has been applied. If SW is truly seeking to consult its customers, then shouldn't they be given the full facts. A lot of effort and energy has clearly been expended in preparing these consultation materials, but a takeaway from reading and studying every single page, unfortunately, is a feeling that it is an attempt to impress or overwhelm by its sheer magnitude of wording, tables and glorious graphics but not in meaningful substance and fact.	(a) We strongly refute any suggestions of trying to hide any documents during the consultation process. The documents that were not published were listed in the 'Statement of Exclusions' on our website along with other consultations documents. These were not published in order to comply with the Security and Emergency Measures Directive (SEMD). However, while they were not published, they were available for viewing, any note taking, at our offices in Durrington. This information was included in the Statement of Exclusions. The capital and operational costs for each option were included in the water resources planning tables that accompanied the plan. The selection of options is done through an investment model which considers economic costs, carbon costs as well as factors like resilience to climate change, customer acceptability etc to deliver overall best value. The best value objectives, metrics and criteria were described in Section 6.5 of our rdWRMP24 Technical Report and the decision making process was described in Section 7.1 of the same report. Information about each option considered in the plan was given in Annex 13 to the rdWRMP24 Technical Report.
	(b) SW really doesn't seem interested to be making any genuine effort to review all the options, but instead appears to be just looking to fill a gap until their obviously preferred and clearly 'predetermined' wastewater effluent recycling solution is completed. They should have examined/explained all the options more adequately, and especially the clearly obvious more sustainable ones in the light of climate change expectations. This is clearly deliberate.	(b) We note the comment. It is unclear as to which water recycling option the comment refers to. We are planning to build for water recycling plants over the next 10 years. These include Portsmouth Harbour WTW and Sandown in the Western area, Littlehampton in the Central area and Sittingbourne and Medway in the Eastern area. Sandown, Littlehampton and Medway were part of our WRMP19 preferred plan and were included in WRMP24 to comply with the Water Resources Planning Guideline issued by Defra, the Environment Agency, Ofwat and Natural Resources Wales. The Sittingbourne recycling option was included in the WRMP19 as a strategic alternative. Our WRMP19 preferred plant included a large desalination plant in Southampton. As part of the assessments carried out for the Regulators' Alliance for Infrastructure Development (RAPID) gated process, the desalination plant was considered to be undeliverable at the selected site at this point in time. The Portsmouth Harbour recycling option, which was included in WRMP19 as a strategic alternative was selected instead (RAPID_gate-2-submission-summary).
	(c) There are areas of inconsistency in methodology and resultant conclusions throughout the consultation material and especially in relation to population and household forecasting. In Annex 7a Demand Forecast (@June24) SW is projecting population estimates for time period range 2026-2071, but non-household demand and other analysis in this particular document is based on a different time period 2026-2075; Annex 7b (@June23) by WRSE however uses 6 analysis models covering 2021-2050 and then 2021-2100 [Portsmouth Water specific is page 8 and Southern Water specific is page 11]; But Annex 7c (@Jan2021) by Ovarro Connecting Technologies has some interesting information on human domestic activity and	(c) Section 4 in Annex 7a clearly provides growth projections for two time periods; 2020-2050 and 2050-2100. Demand forecast is given for the period 2025-26 to 2074-75 (2026-75) as this is the period covered by the plan. It is informed by the growth projections for the period 2020-2100. The outputs of demand forecast (Section 8 in Annex 7d) are again for the period 2020-2100 consistent with the original growth forecast. We do not see the inconsistency that is being referred to here.

Reference	Comment	Southern Water response
	water usage yet for a different time period 2019-2099 and is based largely on SW/WRSE earlier data; Then Annex 7d (2020) by Artesia Consulting forecasts over period 2019-2100 using again largely SW data; Finally Annex 7e (July2023) by Artesia Consulting is a update on non-household forecasting only but still appears largely based on SW's earlier research data. Annex 14 however, only has a single bullet point statement of "Population in our supply area is forecast to increase 17% from 2025 to 2050" but does not qualify whether this 17% is solely in relation Southern Water catchment, or, combined and inclusive of Portsmouth Water and it also does not explain its underlying methodology. Furthermore, SW's Consultation Summary page 18 part 5 simply states "the population will grow between 7% and 34% from 2025-75" which is rather vague and just regurgitates the absolute highest and absolute lowest values of any analytical model, and the full Technical Report page 81 SW is presenting forecast data in the same presentation analysis model manner as used by WRSE in Annex 7b but on page 80 uses timeline 2025-75 and shows very different values, which unlike Annex 7b, are combined and the narrative indicates these are the UK consolidated forecasts and not, per the Annex 7b, specific to SW's catchment area. The question therefore is which of these population and household forecasts is correct and relevant? And why is SW using so many varied timelines, methodologies and geographic data. And are these numbers really in accordance with the Office of National Statistics and agreed by OFWAT/Defra? [See also point (l) on page 6]. If these numbers are indeed in any way incorrect or overstated this could fundamentally distort any business case seeking to justify substantial operational or infrastructure solution costs, or in applying OFWAT's funding mechanisms. This most definitely warrants closer scrutiny.	We believe "Population in our supply area …." clearly indicates that the quoted numbers are for Southern Water area only. The range given in the summary consultation document comes from Table 5.2 in our rdWRMP24 Technical Report. The summary consultation document is intended to summarise the information in an easy-to-understand manner without going into details. There is little point in publishing a summary document if it is going to simply reproduce the details from the main technical document. Without specific examples of any inconsistencies noted in Southern Water data and WRSE data, we are unable to comment on this point. All of the growth projections described in our plan are relevant as they have been used come up with the growth projections that define the 9 different future supply-demand scenarios that have been considered in our plan (Figure 5.29 in rdWRMP24 Technical Report).
	(d) Southern Water are presenting the concept of wastewater recycling plants at Havant, Sandown and Littlehampton ([redacted]) as 'National Significant Infrastructure Projects' and in so doing so presumably hope to get around and bypass the Local Planning Authority and, thereby, apply directly to the Secretary of State and the Planning Inspectorate for a Development Consent Order for permission to start construction without further formality, even though more environmentally sound, economical and sustainable options appear to have been dismissed without it seems due consideration, and with environment studies still ongoing. This surely is not acceptable.	(d) This is not correct. The HWTWRP is being taken through the Development Consent Order (DCO) and the Littlehampton and Sandown recycling schemes are being progressed through the Town and Country Planning Act (TCPA). The DCO goes to the Secretary of State but requires a high degree of consultation and environmental assessments and engagement with the relevant local planning authorities on all aspects of the DCO application, including environmental assessments. The relevant local authorities also have a statutory role in providing a local impact report setting out how HWTWRP may impact their administrative area that will be considered as part of the process and they will be involved in discharging the post consent requirements (which are akin to planning conditions).
	(e) Missing documents were not omitted by accident and are confirmed to have been placed under restricted access on grounds of national security and viewable only under close supervision at SW Head Office, Worthing, Potential respondents are expected to apply for and have the mobility to travel to Worthing to see the missing documents. Irrespective of the reason in restricting access, which undoubtedly was sanctioned by Defra/OFWAT, the	(e) The reason behind restricted access to some of the documents has already been explained in response to (a) above. We have nothing further to add here.

Reference	Comment	Southern Water response
	missing parts likely contain much of the substance needed by respondents to make judgements …. and this can only but be interpreted by the customer as an attempt to conceal weaknesses and bias in SW's clearly preferred and pre-determined strategy. Was this their intention? To satisfy an obligatory consumer and regulator consultation protocol yet manipulating respondents towards an already 'predetermined' expected outcome? This essentially therefore makes the whole consultation process a bit of a waste of space and laughable and shows an organisation as clearly lacking in integrity, openness and honesty in relation its customers (and regulators), and especially when we now learn from those who did inspect these restricted documents that these are similarly terribly lacking, inaccurate and highly dubious at best and still do not provide the necessary substance. Unbelievable!	
	(f) SW's main and clearly obvious preferred strategy is to recycle wastewater for human consumption and especially via the new Portsmouth Water initiated reservoir at Havant which was originally only intended to store spring chalk stream water. Capturing and saving winter rainfall by building more reservoirs or using aquifers is, as it clearly appears, considered secondary by SW. The consultation materials do not seem to include much, if any, climate change modelling either. Climate change will cause far drier summers and much more wetter winters, so capturing and storing winter rain must surely be the more logical and environmentally sensible solution and especially also for flood control and storm spill reduction rather than looking to get more water supply through recycling waste.	(f) The HWTWRP is the core part of our strategy in the Western area but the Havant Thicket Reservoir is a key part of it. We are working with Thames Water and Affinity Water on another large reservoir (SESRO) and our plan includes River Adur Offline Reservoir in the Central area. Water recycling and desalination are not dependent on rainfall and therefore provide greater resilience, especially during prolonged, multi-year droughts. Reservoirs are more useful during droughts of shorter duration.
	(g) Market trading in 'water credits' is also mentioned in the material. This must be refused by Defra as it creates opportunity for water companies and developers to manipulate outcomes when they are failing to deliver on its required objectives.	(g) We have considered 'water credits' as an approach in the context of water neutrality in Sussex North WRZ but no final decision has been made.
	(h) It is noted that SW say this to be 'a once in a generation opportunity to develop more resilient supplies, but to take action now to make the right decisions and invest in more sustainable solutions'. But what comes down to us as rainfall is surely indeed the more ideal and undisputable sensible sustainable solution where it would be easily captured and stored and could be used with minimal processing ready for human consumption and at the same time reduce flood risk and stormwater spilling. If SW really is serious, then shouldn't storage therefore represent its primary and lead strategy rather than recycling wastewater. Where are the facts? Why are these facts not being shared with us in the consultation. What is so confidential it had to be placed under a restricted access?	(h) Our plan includes three reservoirs and we will be exploring additional reservoirs for our next plan (WRMP29). However, as mentioned above, reservoirs are more useful for droughts of shorter duration.
	(i) In the consultation material there is a very old and out of date Table from 2017 illustrating the then locations of wastewater recycling deployment world-wide, but most if not all (other than perhaps Chelmsford UK?) are in locations which have very little or hardly any rainfall. That's why those locations had to go the wastewater recycling route! But why present a 7-	(i) Given the amount of time (typically 10-15 years) it takes to build large infrastructure projects such as reservoirs, desalination plants and water recycling plants, we do not consider information from 2017 to be outdated or irrelevant. We have provided examples of where water recycling, as a technology for public water supply, has been

Reference	Comment	Southern Water response
	yearold table in the consultation material? Doesn't SW have any up-to-date information on this? And how can we in the UK seriously compare ourselves to California when we get so much rain in our country. It is also noted that the timeline for wastewater recycling has come forward in this new consultation material to 2034. But is this truly achievable and a realistic expectation to do all this within 9 or 10-years or are we to going to see revision and protracted delay and wasteful effort when the true logistics and cost is revealed. Was it not also revealed in a SW own Environment Information Report that Hampshire wastewater recycling strategy was likely to have significant adverse impact upon the marine environment, had the highest environment negative impact score and studies on this still ongoing? So how can we be leading with a strategy that has not yet established its credentials for deployment in the UK and which has yet to adequately progress through OFWAT's 'Regulator's Alliance for Progressing Infrastructure Development' [RAPID] funding protocol. Where are the facts?	successfully used and continued to be used. Local weather or climate is not relevant for this purpose. We recently carried a public consultation on the HWTWRP following an earlier one in 2022. We anticipate submitting our consent application for the project in 2025 which will include an Environmental Statement with assessments of the potential environmental impacts. We refer you to our dedicated webpage for the HWTWRP (Home - Hampshire Water Transfer and Water Recycling Project) for detailed documents that were published as part of the 2024 consultation. As part of our submission to RAPID Gate 1, WfLH programme reassessed the option of a 75Ml/d plant on the West Southampton Coast along with a number of alternatives. In total nine options were considered including three desalination options, five water recycling options and one water transfer option. We submitted our assessment in September 2020 (Southern-Water-accelerated-Gate-1-submission-summary.pdf). Further assessment post Gate 1 submission removed one desalination option and the Gate 2 submission dated November 2021 identified two options for further development. (Gate-2-submission-summary_redacted.pdf). The preferred option was a direct raw water transfer from Havant Thicket Reservoir to Itchen Water Supply Works (WSW) supplemented by the recycled water from a water recycling plant. This option is now known as the Hampshire Water Transfer and Water Recycling Project (HWTWRP). A Back Up option was also identified. This involved transfer of recycled water from a water recycling plant to Itchen WSW via an environmental buffer. Desalination options were removed from further consideration at this stage. This was supported by RAPID at Gate 2. Prior to the Gate 3 submission, as set out in the Interim Update for Gate 3 (rapid-gate-three-annex-8c-gate-three-interim-update.pdf) a decision was made to not take forward the Back Up option. Although both HWTWRP and the Back Up option were able to meet requirements of supplying 75Ml/d in the Western Area (as required by WRMP19), HWTWRP presented significantly better value for customers due to its shorter delivery schedule and was better able to meet long-term regional supply requirements due to improved adaptability. Therefore, all effort was focussed on progressing HWTWRP as the preferred option. In its recent Gate 3 draft determination of HWTWRP, Ofwat has decided to continue funding the development of this option (HWTWR-Gate-three-draft-decision.pdf). All documents we have submitted as part of Gate 1, 2 and 3 submissions can be found here: Water For Life – Hampshire Technical Documents

Reference	Comment	Southern Water response
	(j) It is not clear from these materials as to the interrelation of first stage wastewater treatment efficacy from a wastewater treatment works and representing the source wastewater Final Effluent that then will flow onwards to the recycling process has been fully examined. For instance, does [redacted] wastewater treatment works [WwTW] also require infrastructure capital investment to improve its process efficacy before its Final Effluent goes forward to reverse osmosis recycling technology? Does the business case consider this? [redacted]'s operational process efficacy in 2023 from crude influent to final discharged effluent [FE] was not very impressive and does not yet have UV disinfection on its FE or on storm discharges. What presenting FE values therefore need to be achieved before going onwards to a reverse osmosis recycling process and what in relation to this has been factored into the efficiency, operational performance and likely running and maintenance costs in the Havant recycling case financials? [redacted] WwTW is largely a biological process which removes a lot (but not all) of what goes down the sink, bath or toilet or from run-off at times of storming. During the winter months its operational process handles a far greater total volume because of stormwater ingress into the common sewer system. What is removed as 'waste' then goes off-site for further treatment to mainly convert into fertilizer. Importantly this waste doesn't go back into any river or the sea unless the farmer spreads more than the land can absorb, or spreads too closely to a water's edge, and it therefore gets into the storm runoff and onwards to the Solent or to a WwTW. However, in the Havant recycling model it will receive [redacted] FE from which it further extracts the remaining (but not all) contaminants and, using the SW example, would take 80 million litres of FE to generate 60 million litres of 'cleaned' raw water which it will then send onwards to the Thicket Reservoir to blend with spring water. But what does SW intend doing with the 20 million litres of now highly concentrate recycle process 'wastewater'? The available SW information on this is suggesting this would be piped directly out of the Long Sea Outfall without further treatment. So, 80 million litres of current FE less is discharged by [redacted] WwTW (which sounds impressive) but 20 million litres of recycle waste will still go into the Solent but now containing 4x fold concentration of equivalent waste contaminates. So, no improvement. If though it is indeed to go back to [redacted] WwTW for further processing then can this be clearly and absolutely confirmed, and that [redacted] will indeed be able to handle this increased concentration of contaminants and been properly factored into the business case design and cost-benefit analysis? It is also known that recycling does not cope well with high FE variability and the results to date from SW's [redacted] recycling pilot are far from encouraging and energy consumption required by recycling is known to be high.	(j) For details on the HWTWRP were refer to the dedicated web page for the project (Home - Hampshire Water Transfer and Water Recycling Project) which includes all documents that were published as part of the 2024 public consultation.
	(k) If we are all seeking to be more environmentally friendly, then SW should not expect, and Defra/EA should not allow, any further use of drought options orders and instead focus more firmly on getting other more sustainable energy efficient options implemented asap which work with change climate such as capturing winter rain to also reduce flooding and storm spills and then we wouldn't then need the likely hugely costly and high energy consuming reverse osmosis recycling technology so early in a proper structured strategic plan.	(k) A key driver for HWTWRP is eliminate reliance on supply-side drought options in Hampshire.

Reference	Comment	Southern Water response
	(l) Defra/OFWAT (or whoever) needs to examine very closely the population and water supply volume forecasts being put forward by SW for both household and non-household consumption. The presented numbers look dubious and questionable in relation to SW projected supply needs. SW consultation materials clearly state it currently supplies 565 million litres of drinking water per day (presumably inclusive of the 19% lost through leakage) and that by 2075 it will need to supply an additional 587 million litres per day. [Consultation Summary page 4]. The total by 2075 would then be 1,152 ml/day. Given the likely rounds of proof reading and sign-off prior to publication release this cannot be a typo or error! So how do we get to those numbers? We learn from the Technical Report (page 80) that by 2075 the SW catchment area population forecast is between 2.9 million (using 7% lowest forecast) and 3.6 million (using 34% highest forecast) and we learn further from Lawrence Gosden in his Consultation Summary Introduction that SW currently has 2.6 million customers. But 2.6 million increased by 7% equals 2.782m (not 2.9m) and a 34% increase would be 3.484m (not 3.6m). Not an insignificant inconsistency. Using alternatively the stated baseline of 23% per Page 81 Table 5.2, this still only gives us 3.198m population in 2075. Another inconsistency. Using, though, the highest possible 34% (3.6m) population growth and assuming 110 l/day target customer consumption is indeed actually achieved then SW would need to supply only 396 ml/d total all-in. If we assume that consumption remains at current 128 l/day then for 3.6m population we would still only need 450 ml/d all-in. But we are told that by 2075 SW needs to generate 565 ml/d PLUS 587ml/d totalling 1,152 ml/d. How come? Turning our attention now to the additional non-household [NHH*] forecasting, the Artesia report tells us that SW estimates in 2025 NHH will consume 115 ml/d (within a range of 71-142 ml/d) and by end of the planning period which is stated in this report to be 2100 it says SW will need to supply NHH of 122 ml/d (within a range of 107 – 207 ml/d). So…….the final numbers for 2075 would therefore likely be: (3.6m x 110 l/d) + 122 ml/d = 518 ml/d or (3.6m x 128 l/d) + 122 ml/d = 572 ml/d But by 2075 we are told by SW they will need to supply a total 1,152 million litres per day?? This is a very significant inconsistency which needs to be fully explained and/or corrected. If found to be incorrect and overstated as this analysis suggests, then this will fundamentally distort any operational and infrastructure solution costs and cost to benefit conclusions of most if not all business cases, and especially recycling. Perhaps also other government departments need similarly to be engaged in relation to the wider infrastructure implications of these projections [Non-Household NHH is defined as agriculture and other dependent	(l) The need for future water is not driven by demand only. It also takes into account the changes in our existing supply due to climate change and the reductions we need to make in the amount of water we current take from rivers and groundwater. The percentage increase in population the rdWRMP24 Technical Report are based on growth over the planning period. Under the maximum growth scenario, our total population in 2024-25 will be 2,721,830 which will increase to 3,646,270 by 2074-75 giving an increase of 924,440 or 34% by 2075. The 2.6 million figure in the consultation summary refers to the **current** population at the time of publication. Our reported 2023-24 population figure was 2.67 million which should have been rounded to 2.7 million, not 2.6 million in the consultation summary document. The error is regretted. Table 5.2 in our rdWRMP24 Technical Report gives a comparison of **household** population (as mentioned in the table caption) and excludes non-household population. The addition of the future needs figure (587Ml/d) to current volume of water put into supply (565Ml/d) to come up with total water need is fundamentally wrong. The total future water need is based on increase in demand due to growth along with changes in current supply due to climate change (Table 5.6 in rdWRMP24 Technical Report) and reduction in available supplies due to Environmental Destination (Table 5.10 in rdWRMP24 Technical Report). The calculations included in this comment are therefore misleading.

Reference	Comment	Southern Water response
	industries, non-service industries, service industries population driven, service industries economy driven and unclassified].	
	(m) This respondent is also concerned why Defra has not yet released its promised chalk stream recovery plan which was supposed to have been published last year (2023). The then Minister on 15th June 2023 said it would be published by end of 2023. What therefore has happened to this very relevant and important recovery plan in relation to this WRMP24 Consultation?	(m) The comment is directed at Defra. We are therefore unable to respond to it.
	(n) The Water (Special Measures) Bill now progressing through Parliamentary due process and the setting up of a special Commission to include also lobby groups and due to report back June 2025 will hopefully be very revealing in this respect as the measures (as stated in the House of Commons announcement and debate 23rd October) will include also forensic accounting. But only time will tell however whether this new government initiative will be any different from those which have gone before and which failed miserably to grasp and deliver anything meaningful and, if anything, could make matters even worse. But do we not already know exactly what needs to be done? Why therefore is more study, more investigation, more discussion needed in arriving at undoubtedly the exact same conclusions as last time?	(n) This comment is about a parliamentary procedure that we are unable to comment on.
	(o) As a final observation, it occurs to this respondent that what we are discussing, examining and commenting upon now, today, through this consultation should really have been presented decades ago. The Water Act of 2003 supposedly imposed upon water services companies an obligation in future to maintain a rolling 25-year plan to deliver water to a then obviously increasing consumer base and changing consumer behaviour. So why are we only now recognising and 'consulting' on the inadequacies in supply, of leakages occurring and why have we not already built those reservoirs to capture winter rainfall, eliminated stormwater ingress, built adequate storm tanks and taken forward all the other remedial actions. What exactly has SW, Defra and EA been doing (or rather not doing) these past 3 decades?	(o) Southern Water, along with other water companies in England and Wales, has been developing WRMPs since 2004. The plans have been previously published in 2004, 2009, 2014 and 2019. Thes plans have been scrutinised by the Environment Agency and signed off by the Secretary of State of Defra.
WRMPSV45	Our water supply needs to be more resilient and an increase in storage, along with a reduction in use and wastage is a positive move. The addition of recycled water into the drinking water supply is not a positive move with current management systems and technology available. Most importantly control and a reduction of waste water discharge to zero should be a priority over the next 10 years and sooner if possible.	Thank you for taking the time to review our plan and provide feedback. We note your support for building reservoirs and reducing leakage and your opposition to water recycling. We will be using the latest technology and best practice for water recycling to ensure that the water meets the strict UK drinking water standards. Regarding your concerns about wastewater discharges, we refer you to our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)) which describe the steps we are taking to improve our wastewater performance.

Reference	Comment	Southern Water response
WRMPSV46	We note the consideration of delivering BNG associated with proposed projects, we would highlight that the requirement is to deliver at least a 10% BNG and we would strongly encourage a more ambitious target (minimum 20% BNG). We would welcome a greater commitment to ambitious BNG, which aligns to delivering the priorities identified within the emerging Local Nature Recovery Strategies.	We thank the RSPB for its feedback. We note the recommendation to adopt a more ambitious BNG target for scheme delivery and will take it into consideration.
WRMPSV47	Garford Parish Meeting is extremely concerned that Southern Water's plan fails to consider the strategic water resource impact of exporting water out of the Thames valley, where it is most needed for public supplies and for reducing abstraction in Thames valley chalk streams that are far more heavily abstracted than the Rivers Itchen and Test. The WRMP documentation fails to make clear that the T2ST plus SESRO has been proposed to achieve only an occasional small benefit to the Rivers Test and Itchen and it is not needed to provide resilient public water supplies in times of population growth and climate change. There is no consideration of whether the small benefits to the ecology of the Rivers Test and Itchen justify the impacts of construction of the T2ST plus SESRO on the local communities and environment in the SESRO area and along the pipeline route. There is no consideration of whether it is right to solve a perceived local environmental problem by creating large environmental problems elsewhere. We note Southern Water's parlous financial state. Given this, we find it incredible that the draft WRMP proposes to spend £1.6bn on the unnecessary T2ST and 30% share of SESRO. This £1.6bn may well be the difference between Southern Water's survival and its bankruptcy. Furthermore, it is all the more incredible given that the perceived environmental benefits of the schemes are only assessed at £29m as noted above. We further note that Southern Water's customers would be the ones ultimately bearing the cost of T2ST and 30% of SESRO. This financial impact is made even worse by the Return of Regulated Asset Base model of water industry finances which means they would pay a multiple of £1.6bn over the years. Another of Garford's residents has developed a model of these costs to consumers and estimates that the cost to customers of the £1.6bn schemes would amount to approximately £5bn in today's money. The above are all topics that should have been raised in the consultation Questionnaire.	We thank Garford Parish Council for the feedback. We presume the comment about export of water from the Thames valley refers to T2ST. If our presumption is correct the we would like to point out the volume supplied through T2ST will be the water that is surplus to Thames Water's needs. It does not disadvantage Thames Water customers in any way. It is incorrect to suggest that T2ST and SESRO are primarily being developed to offset the sustainability reductions in our abstractions from the rivers. T2ST is a key part of our plans to develop a resilient supply network going forward but the reductions in our licences on the rivers Test and Itchen are being addressed through the development of the Havant Thicket Reservoir and the HWTWRP. We note your comment about Southern Water's financial position and respectfully disagree. We are financially resilient and maintain a strong liquidity position, with the strong backing of our shareholders who have injected more than £1.6 billion of fresh equity into the Southern Water group since they joined in 2021. This financing has allowed us to spend £3bn during 2020-25 (or £1,500 per household) and implement our Turnaround Plan, to deliver for our communities and the environment. We acknowledge the ongoing challenges and uncertainty faced by all companies operating in the UK water and wastewater sector, but we are confident in our ability to deliver what we have set out in our future investment plans. We are not privy to the work done by the Garford resident. We are therefore unable to comment on it. We would like to point out that the impact of all our schemes on customer bills is scrutinised by Ofwat as part of our Business Plan submission. We have not specifically consulted on SESRO as the scheme is being developed by Thames Water and is covered in its consultation (South East Strategic Reservoir Option (SESRO) - Thames Water Resources Management Plan). Our questionnaire invited the respondents to provide additional comments on any aspects they considered important as has been done here. There was also the option of sending an email or letter to Defra about about our plan. The relevant email and postal addresses were provided in the consultation documents.
WRMPSV48	Against the Abingdon reservoir, the location should be a flood storage. If TW wants to build a reservoir, such reservoir should be in the river flow and serve as storage for flood. In recent years, climate change has proven to bring more water than the opposite, Abingdon residente	Thank you for taking the time to review our plan and provide feedback.

Reference	Comment	Southern Water response
	have been flooded 3 times this year and the reservoir will reduce the water storage on the floodplain and further increase the flood risk.	We note your opposition to SESRO. We refer you to the webpage set up by Thames Water (South East Strategic Reservoir Option (SESRO) - Thames Water Resources Management Plan) for more information about the project.
WRMPSV50	The First Priority for you to obtain public support would be clear and obvious evidence that you are reducing the storm discharges of effluent into the Solent and have adressed major leaks in your system, which is wasting this valuable resource	Thank you for taking the time to review our plan and provide feedback. Regarding wastewater discharges, we refer you to our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)) which describe the steps we are taking to improve our wastewater performance.
WRMPSV51	I do not support the dangerous idea of building an enormous, above ground reservoir near Abingdon. There are many reasons. 1, it will raise the water table in an area where flooding is already commonplace. 2, you are still losing huge amounts of water to leaks. Sort that before getting distracted with other plans. It is too dangerous to store that volume of water ABOVE GROUND. It will one day leak. Even if in 100 years' time, it will leak, (especially with your record) TOO MANY PEOPLE WILL BE KILLED. 3. You have desalination plants which you are not using to their capacity. WHY NOT? You are behaving like spoiled children who get easily bored with an idea, wish to reject it and start on another (unproven) one. Grow up and show that you are capable of success before embarking on a new idea. Don't raise our water level, fix the leaks you already have to deal with, use your desalination plants that you have already, don't use experiments in storing water above ground on such a scale and endanger thousands of lives. "	Thank you for taking the time to review our plan and provide feedback. 1. SESRO will not be an 'above ground' reservoir. It will effectively a man-made lake (South East Strategic Reservoir Option (SESRO) - Thames Water Resources Management Plan). Flow to and from the reservoir will be via a tunnel deep in the foundation of the reservoir. Water into the reservoir will be transferred using a pumping station on the river Thames which can be controlled, and a draw-down tunnel will be installed to lower the reservoir when needed. 2. Storage reservoirs are designed and constructed so as to prevent leakage. Once build reservoirs are subject to a strict monitoring regime from qualified reservoir engineers. 3. We have not built a desalination plant to date but our plan includes building them in the future. We plan to reduce leakage by 53% by 2050, which exceeds the 50% leakage reduction target set by the Government. As mentioned above, we have not yet developed any desalination plant.
WRMPSV52	I have concerns that the duty of water companies to connect whatever the level of development, seems to be going unchallenged. This is a national issue. It is leading to energy intensive schemes such as the use of desalination and water transported from Norway - both with a high carbon footprint. I do not believe we can engineer our way out of every natural constraint. While SW has focused re-education on reduction in water use, I think that many people are unaware how inherently costly the water service is. The increase in water bills will be added to increases predicted for waste water bills - SW (and other companies) may well face a backlash on the cumulative impact on households. A more fundamental re-education will be needed to understand that water is a scarce resource that we all share and that the attitude 'I pay for it, so I can use what I want' has no place in the future. Keeping water in the environment is important. Will the monitoring programmes be sufficient to track impacts over the long-term?	Thank you for taking the time to review our plan and provide feedback. Our plans are scrutinised by our regulators (Environment Agency and Ofwat) and organisations such as Natural England to ensure that there is a well established need for the options we are proposing, the potential environmental impacts are identified and mitigated and the costs are appropriate. We are mindful of the impact of our proposed investments on customers bill. However, these investments are needed to ensure that we can maintain uninterrupted supplies of water in all but the most extreme weather conditions. We agree that more needs to be done to raise awareness about water as a scarce and finite resource. We are pleased to note that our consultation documents were considered useful and informative.

Reference	Comment	Southern Water response
	I appreciated being given a paper copy of the full technical report at a consultation event. I have read it with interest. I also appreciated the technical information given in the on-line consultation. I had not thought, for instance, about the problem of disposing of the salt from a desalination plant. It was salutary also to be reminded that only about one percent of the fresh water on the Earth is in lakes, rivers and other surface water.	
WRMPSV53	I feel that there has been a great emphasis on running Southern Water with a view to making huge profits rather than with a concern for the environment. We are still seeing so much water wasted through leakage and poor maintenance, and it appals me that re-cycling of waste water should be considered when there is absolutely no guarantee that this will be a completely safe process. Water is vital for all life, taking from rivers when we have no reserves speaks of being ill prepared, I'm sure there are other ways around this. Please do not recycle waste water for your consumers.	Thank you for taking the time to review our plan and provide feedback. The rate of return on investments that water companies can make is determined by Ofwat. Southern Water is not making a profit. We have actually registered losses in the last two accounting years, as we invest more in our networks than we previously pledged to. We will be using the latest technology and best practice to ensure that recycled water meets the strict UK drinking water standards.
WRMPSV54	More emphasis should be placed on reducing leaks, water storage, and improving the distribution system and less on expensive environmentally solutions like desalination and water water recycling	Thank you for taking the time to review our plan and provide feedback. We plan to reduce leakage by 53% by 2050, which exceeds the 50% leakage reduction target set by the Government. Our plan includes three storage reservoirs (Havant Thicket Reservoir, SESRO and River Adur Offline Reservoir) over the next 20 years and we are improving our connectivity with our neighbouring water companies. We have included options like desalination and water recycling in our plan as we are not able to take more water from rivers and groundwater. As we have explained in our plan, we are required to reduce the amount of water we currently take from the environment.
WRMPSV56	Vale of White Horse District Council wishes to make clear our vehement opposition to the proposed Abingdon reservoir (SESRO) and associated pipelines which, as part of the proposed Thames to Southern Transfer Project, would provide Southern Water with up to 120 million litres of water per day from 2040. The Vale does not believe that the case has been made for the SESRO to proceed. Consequently, as the necessity for the reservoir has not been proven, we do not believe that Southern Water should be including it or relying upon it within its own future plans. The reservoir at Abingdon would, under Thames Water's current proposals, create the second largest reservoir in England. This would have a profound impact on the surrounding landscape and environment of Oxfordshire, the negative effects of which cannot be mitigated. Moreover, the construction and operation of this reservoir will lead to a significant increase in carbon emissions – something that our council cannot support and would be counter to our target to achieve a carbon-neutral district by 2045. Vale of White Horse District Council also has safety issues regarding the SESRO. Thames Water has so far failed to provide adequate information regarding both the engineering and safety design of their proposals.	We thank South Oxfordshire and Vale of White Horse District Council for its feedback. We note the Council's opposition to SESRO and T2ST. We would like to point out that the Secretary of State for Defra has approved Thames Water's WRMP24, which includes SESRO and Thames to Southern Transfer (T2ST). Both SESRO and T2ST will be subject to further assessments and consultations. We are unable to comment on the adequacy of Thames Water's consultation on SESRO. There are no areas of abundant or plentiful water in our region. Regional planning encourages water companies to work together to develop options that benefit a region as a whole. The Council's view on the potential environmental impacts of the pipeline route from Thames Water to Southern Water, in view of the various policies and acts, is noted. All relevant legislative and planning requirements will need to be met for the project to proceed.

Reference	Comment	Southern Water response
	Furthermore, although the council in principle supports the concept of transfers between areas (the idea of creating a national grid for water), we do not see the reasoning behind taking supplies from one water-stressed region (Thames) to meet the needs of another water-stressed region (Southern). Any effective solution for meeting the future needs of Southern Water would, in our opinion, take water from areas with plentiful/abundant supplies. Our other main concern is that to transfer water from Abingdon to Hampshire will require the construction and routing of water pipelines across/through the North Wessex Downs National Landscape. This will have a negative/adverse impact upon the National Landscape including on natural habitats, ancient woodlands, historic environment, on tranquillity and public opportunity for quiet enjoyment. This is especially pertinent given the fact that we do not believe in the merits of the proposed reservoir or pipeline. We also do not consider that sufficient weight and focus has been given to national policy in the draft WRMP. National Landscapes are designated at a national level due to their natural beauty and are subject to the highest level of protection. It is essential that any development in or affecting a National Landscape, conserves and enhances its landscape and scenic beauty. The National Planning Policy Framework (NPPF) states that great weight should be given to conserving and enhancing their landscape and scenic beauty, and that the scale and extent of development within National Landscapes should be limited. Major development (which a water transfer pipeline clearly would be) should only be permitted in the National Landscapes in exceptional circumstances. With other strategies and demand management options available, we do not believe this threshold has been met. Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a legal duty to seek to further the purpose of conserving and enhancing the natural beauty of the National Landscape. This was strengthened in 2023 from a simpler previous requirement to 'have regard' to it. The duty applies to local planning authorities and other decision makers in making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers. Interim advice from Natural England is that the new duty to 'seek to further' is an active duty, not a passive one. It underlines the importance of avoiding harm to the statutory purposes of protected landscapes but also seeking to further the conservation and enhancement of a protected landscape, which goes beyond mitigation and like for like measures and replacement. Given the above, the council expresses strong concern about the merits and case for routing a water pipeline associated with the proposed Thames to Southern Transfer Project through the North Wessex Downs National Landscape. This project would be subject to the NSIP/DCO process. Relevant bodies, including Natural England, the North Wessex Downs National Landscape Partnership and Vale of White Horse District Council, should be engaged as stakeholders on the merits of this proposal and as well as any details on route options and construction methods.	

Reference	Comment	Southern Water response
	In addition, the construction and operation of the proposed pipeline would lead to an increase in carbon emissions – something that the council cannot support.	
WRMPSV57	In line with the request from the Blueprint for Water coalition in relation to Business Plans, we would like to see a clearer explanation of what environmental outcomes the DWMP will actually deliver. We recommend that the plan includes a summary page of environmental outcomes that sets out what the environment will 'look like' at the end of the plan period. In particular, what catchment-based solutions are being progressed as it is not at all clear from the current documents.	We thank Sussex Wildlife Trust for its feedback. We any queries regarding DWMP, we refer you to our DWMPs (Our Drainage & Wastewater Management Plans (DWMPs)) which describe the improvements we are making to our wastewater services.
WRMPSV58	General This consultation response is from the Test and Itchen Association which represents over 440 riparian owners, river keepers and individual members from the public, including anglers and those concerned for the general condition of the chalk stream rivers of Hampshire. The WRMP remains hard to follow in the plethora of annexes and supporting documents. It is hard to connect the strategy (at part 8) to each of the component parts of the plan. To the layman that is going to be even harder and ways to simplify and connect strategy and plan would be welcomed in future iterations.	We thank the Test and Itchen Association for its feedback. General We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 main technical report. In addition, we also published a non-technical summary that highlighted key features of our plan.
	Explaining Harm to the Rivers from Abstraction. Whilst acknowledging that other plans, in the suite of SW plans, may deal with environmental issues in more detail, there is a scant explanation on why abstraction is so damaging to nature: adverse effects of water temp on fish; flow for migration and macrophyte growth; pollution concentration etc. Continuing on the theme, there is little to no mention of the protections placed on the iconic and rare chalk stream rivers and the rare and unique metapopulation of Atlantic Salmon in the Test and Itchen Catchment along with the Meon; this is important to put the context of over abstraction in place. The general public do not understand these environmental effects. If they are to be motivated to change behavior in support of T100 consumption targets, then the golden thread of harms and risks to nature needs explaining to help understand better the problem facing the rivers and the sacrifices required from society as a whole. I would suggest a small explainer at the front of the document.	Explaining Harm to the Rivers from Abstraction A key driver for our plan is the reduction in the amount of water we currently take from rivers and groundwater. This should be clear to anyone reading our plan. We do not believe that it is up to us to detail the potential impacts of abstractions on rive ecology. The amount of water we have taken from the rivers Test and Itchen has not changed over the last 20 years or so. This is shown by figures 10 to 12 of this annex. Any harm to river ecology during this time cannot be directly attributed to our abstractions from the rivers.
	Delays The UK's lack of available water and particularly in the SE of England is assessed by many as a water emergency. It is thus very disappointing to see further delays to reduce abstractions and to continuing over reliance on Drought Orders and a mix of 'emergency mitigations'. Delays are not adequately explained. We would urge that the options chosen are expediated in the manner appropriate to the emerging crisis in the environment. Physical delivery of	Delays We agree with the Association that every effort should be made to deliver schemes on time. We acknowledge the risk of reputational damage with scheme delays. However, delays are not always due to factors in our control. For example, one scheme in WRMP19 involved a bulk import of water from Bournemouth Water. This was not viable because updated information from environmental investigations showed that this option was not in line with the

Reference	Comment	Southern Water response
	schemes supplying new sources of water, in concert with improvements in waste water management, are fundamental to building back trust with water consumers; further delays will erode trust, not something SW can afford. It is vitally important to deliver on such schemes given the collective ask of consumers to make changes to long held habits around water consumption.	Environment Agency's sustainable abstraction policies. Another scheme in WRMP19 had been intended to supply our customers in Hampshire that could not be delivered is the proposed desalination plant at West Southampton Coast. This was ruled out due to environmental concerns as well as the RAPID options process showing that there were more optimal solutions. We provide more detail on this option process in this RAPID gate 2 document wflh_7_gate-2_conceptual-and-detailed-feasibility_desalination-redacted.pdf
	The Hampshire Water Transfer and Wastewater Recycling Project (HWTWRP). We support this scheme, conditional on the environmental assessments being satisfactory, as fundamental to reducing damaging abstractions. More needs to be done, and possibly reflected in this WRMP's next iteration, to underline the proven technology of waste water recycling, as used in many other countries, in order to counter misleading views about a scheme that is safe, effective and for which there is no current alternative scheme in Hampshire in the near to medium term. The scheme is vital in the efforts to help save the chalk stream salmon. It is therefore equally vital that the Secretary of State signs the DCO; why it is going to take 18 months to process the DCO is bewildering. Efforts to do more, and to do so faster must be a top priority.	HWTWRP We are pleased to note the Association's support for this project subject to satisfactory environmental assessments. We agree that misleading views about the safety of recycled water need to be countered and we are doing that through engagement with our customers and stakeholder as part of our consultations on the HWTWRP. The DCO process requires a high degree of consultation and environmental assessments, which take time. Once the application is submitted it follows a statutory timescale that we are unable to influence.
	Other Water Transfer Schemes. Whilst the national solution to water scarcity is sensibly is to introduce a series of inter-connected water storage and transfer schemes, we remained concerned about the reliance this WRMP places on such schemes. This dependency on other WRMP's for water supply emphasises the need for in house solutions such as the HWTWRP and the need for DEFRA to approve and sign off on such dependencies if this plan is to succeed. I would suggest greater emphasis of the issue is made in the next iteration of the WRMP.	Other Water Transfer Schemes It is not always possible to develop solutions locally. A key aim of regional planning is to allow development of schemes that deliver benefits to a region as a whole, regardless of water company boundaries. We strongly believe that we can deliver better value for our customers by working collaboratively with our neighbouring water companies.
	Housing Targets. This iteration of the WRMP was prepared before the LPAs were issued new housing targets. This will need to be factored into the future iteration of this WRMP or acknowledged that this is within the envelope of the plan.	Housing Targets WRMP is refreshed very 5 years. We will take account of any revisions in housing targets in our next plan, due to be published in 2029.
	SAC Designations. Natural England have recently issued a policy decision on further mitigations to compensate for the continuing Drought Orders/Permits on the River Itchen SAC. This essentially directs LPAs to consider parts of the River Test as SAC as well as the whole of the River Meon. The implications of these will need to be reflected in the future iteration of this plan. Links to the housing targets above.	SAC Designations We are aware of the proposed changes to the status of River Test and its implications for use of drought permits and orders.
	ASR and MAR. Whilst Aquifer Storage and Recovery (ASR) and Managed Aquifer Recharge (MAR) are going to produce marginal solutions we support moves to do so as positive.	ASR and MAR We note the Association's support for such schemes.
WRMPSV59	We have a number of additional concerns about these plans. One is concerns about the reject water, which is to be deposited into the Solent, in the case of Hampshire, into the surrounding	We thank the Chichester and Arun Green Party for its feedback.

Reference	Comment	Southern Water response
	sea at Littlehampton and Sandown and some unclear destination at Horsham. This will still contain contaminants and will have acquired yet more chemicals from the recycling process. This will be more concentrated, and as it will be warmer than the seawater it will float on the surface for some time. This is likely to affet the local ecology and, in the case of the Solent, some protected wildlife areas.tWe are critical of the plans to use Havant reservoir as an environmental buffer. In order to build this reservoir an area of irreplaceable ancient forest was destroyed. We, like many other people and organisations, regretfully accepted this as an exceptional need, and the plans to provide a unique, spring fed reservoir and some alternative biodiversity gain, were seen as a compensation. We consider that much of this would be lost if these plans proceed. The quality of the treated water will inevitably alttr the quality of the water in the reservoir, and this will change the biodiversity within it. In times of drought the concentration of recycled water will be greater, adding to the stress of the whole ecosystem. An additional benefit of the original reservoir plans was that it would store and settle and gradually neutralise nitrates running off surrounding farmland. This would reduce the level of nitrates entering the Solent. This benefit would be lost if these recycling effluent plans are adopted.rWe are also seriously concerned about plans to build the recycling plant on the Broadmarsh landfill site. We understand that piles will have to be driven through this landfill. This site was unlined and contains a range of domestic and industrial waste. There is a serious danger of a large increase of this waste leaching into Langstone Harbour. Moreover, the construction period means that inevitably the internationally important populations of winter migrant birds will be disturbed. Another concern is the data that is used to justify such a major level of infrastructure. SW project a 25% population growth by 2050 in this area. However, the Office of National Statistics forecast a growth of 6-12%. While the need to increase our water security remains urgent, this does imply more time to develop long term solutions such as more reservoirs. Finally, we do have serious concerns about SW being able to deliver such complex plans safely and effectively. They have a history of fines, including a record £90 million fine in 2021 . Last winter residents in our area, in Barnham, suffered weeks of flooding and sewage overflow . Residents had to be supplied with water from tankers as their tap water was unsafe. In this area we suffer regular prolonged sewage overflows, and these are not decreasing . As we suggested earlier, we believe these plans are partly motivated by Southern Water's desire for projects that will yield higher profits for themselves. We believe this is why they have not explored more fully simpler, cheaper solutions. We would urge them to do so.	We note the Party's concerns around locations of reject water discharge associated with water recycling schemes. The reject water will typically be discharged through existing long sea outfalls for wastewater discharges. The proposed discharge locations for Sandown and the HWTWRP can be seen here (Isle of Wight Water Recycling Project - Southern Water and Home - Hampshire Water Transfer and Water Recycling Project). Southern Water and Portsmouth Water are working together to investigate the possible effects on water quality within Havant Thicket Reservoir based on various operational scenarios. This analysis is ongoing with further engagement on the results to come later. Our assessments will also be fully reported on in our Environmental Statement, which will be submitted as part of our application for development consent. Southern Water has purchased "Site 72", an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. The site drainage is to be designed such that surface water runoff will be diverted to sustainable drainage features that attenuate and improve the quality of the flow to environment, without soaking into the landfill, therefore reducing the leachate production attributed to rainfall. The potential impacts of the HWTWRP have been covered in the preliminary environment assessment report that was issued as part of the consultation in summer 2024 (HWTWRP_PEA). We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response. We held a further consultation on water quality for HWTWRP in Spring 2025. This included details of the likely impacts of the project on water quality in Havant Thicket reservoir and the Solent and potential mitigations. We have not based our WRMP24 on a single population growth forecast. As we have explained in our plan, we have considered 9 different supply-demand balance scenarios and different population growth scenarios have been considered for developing the 9 situations (see Figure 5.29 in our rdWRMP24 Technical Report). We acknowledge that our performance over recent years has sometimes fallen below expectations. We are working hard to rectify that. For issues with flooding and sewer overflows, we refer you to our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)) that describe the work we are carrying out to improve our wastewater performance.
WRMPSV60	Expecting to have water from SESRO IS an very expensive project. It puts more pressure on the Oxfordshire area where an enormous tank of water will have a terrible outcome for those living far around. Is Isn't sustainable and the huge cost to the environment is not justified. If built it could raise the water table by about a metre in an area which already floods easily into	Thank you for taking the time to review our plan and provide feedback. Your opposition to SESRO is noted. Our plan includes proposals to use recycling as well as desalination going forward. We are aiming to reduce leaks by 53% by 2050. This exceeds the 50% leakage reduction target set by the Government.

Reference	Comment	Southern Water response
	houses. This is unacceptable and cruel. Use recycling, desalination, transfer from the Severn and fix leaks first.	
WRMPSV61	Please refer to the general comments above, which relate to the wider functions of Southern Water in providing sewerage infrastructure in Wealden District. WDC consider that Southern Water's input into a water cycle study for Wealden District (with other relevant bodies) to better understand the operation of the river catchments of the Ouse and Cuckmere/Pevensey are invaluable, and we would support continued engagement with Southern Water as the emerging Wealden Local Plan progresses. We also look forward to the opportunity of working closely with Southern Water on the development of a Statement of Common Ground (SoCG), which will provide detail on the strategic planning matters of importance to both organisations in support of Wealden's emerging Local Plan. Thank you for consulting with WDC on the draft SWRMP24. I trust that the above representation is helpful at this stage. If you have any further queries, then please do not hesitate to contact us.	We thank the Wealden District Council for its feedback. We have responded to the Council's comments under each question. We are happy to have been of assistance with the water cycle study and would continue to work with the Council, where needed, going forward.
WRMPSV62	No amount of sanitization will make the water available without contamination of hormones and prescription drugs etc. The climate has nothing to do with the failure to manage a company and supply correctly and properly. The water in our area already tastes like bleach due to the amount of harmful chemicals added. You have failed in supplying drinkable water to the paying public for many a year. Just shoving a wordy document online does not excuse poor practices and fraudulent business ventures. Agenda 2050 is a con.	Thank you for taking the time to review our plan and provide feedback. Nowhere in our plan have we linked management of the company to climate change. The water we supply meets the strict UK drinking water standards.
WRMPSV63	I am concerned that Southern Water's track record of caring for our water proves inadequate. The Management Plan does not go nearly far enough to save the water that falls free from the sky. Use the money to save water, prevent leaks, prevent contamination, educate and consider the environment. The idea of tankering water from Norway is absolutely ridiculous.	Thank you for taking the time to review our plan and provide feedback. Our plan includes three storage reservoirs (Havant Thicket Reservoir, SESRO and River Adur Offline Reservoir) over the next 20 years and we are improving our connectivity with our neighbouring water companies. We plan to reduce leakage by 53% by 2050, which exceeds the 50% leakage reduction target set by the Government. Similarly, we aim to reduce PCC to 110 litres per person per day by 2045, five years ahead of the date set by the Government. Raising awareness about water use is one of the initiatives we will undertaking as part of our demand management plan. We note your opposition to importing water from Norway via sea tankers during droughts.

Reference	Comment	Southern Water response
WRMPSV65	CPRE Oxfordshire disagree with the plan to mover water from the Thames Valley to Hampshire. We believe this is not cost effective and is unnecessary - see our full text. (copied below) Dear Sir CPRE Oxfordshire – Response to Southern Water WRMP Below are comments on the Southern Water WRMP from CPRE Oxfordshire. We focus on the proposal for the proposed Abingdon Reservoir (SESRO) to supply Southern via a pipeline. SESRO will have a massive impact on the Oxfordshire countryside, and we feel strongly that other options have not been adequately explored. We do rely heavily on the professional analysis by the Group Against Reservoir Development (GARD) and refer the reader to their more detailed analysis. The Southern Water WRMP includes a proposal to transfer up to 120 Ml/day of water from the planned Abingdon reservoir (SESRO) to Hampshire via a new pipeline termed the Thames to Southern Transfer (T2ST). Southern Water would contribute 30% of the costs of SESRO. The primary purpose of the Thames to Southern transfer is to reduce abstractions for water supply which impact on the flows of the Rivers Test and Itchen, where drought orders and permits can be currently used to allow abstraction to continue in severe droughts. In contrast to Thames and Affinity Water's proposed use of SESRO, it is not needed to deal with public supply shortages, due to projected population growth or climate change in Hampshire areas. The cost of the Thames to Southern transfer and Southern Water's share of SESRO will be in excess of £1.5 billion. The water companies themselves have assessed the economic benefit of the transfer as only £29 million. In our opinion, the T2ST scheme should be abandoned due to its minimal benefit, its high cost, and the perverse plan to export a large amount of water out of the Thames valley, where it is most needed for public water supplies for London and elsewhere. Taking this much water out of the Thames catchment would clearly have an impact on the ecological health and water supplies in the lower Thames. The T2ST scheme is not needed to deal with public supply shortages due to population growth, climate change or chalk stream abstraction reductions, all of which can be met by the new Havant Thicket reservoir and Portsmouth effluent recycling schemes. (Southern Water should also redouble efforts to reduce leaks and water usage across their region.) The T2ST would then only be needed to prevent use of drought orders on River Itchen and Test supplies, perhaps once in 50 years (not once in 5 years as claimed by Southern Water). Indeed, records which show the drought orders and permits would last have been needed in the 1976 drought; they would not have been needed in the droughts of 1989, 1991, 1995-97, 2005-06, 2011, 2019 and 2022.y The T2ST scheme is not needed to deal with public supply shortages due to population growth, climate change or chalk stream abstraction reductions, all of which can be met by the new Havant Thicket reservoir and Portsmouth effluent recycling schemes. (Southern Water should also redouble efforts to reduce leaks and water usage across their region.) The T2ST	We thank CPRE Oxfordshire for the feedback and note the opposition to transfer of water from the Thames Vally to Southern Water supply area.

Reference	Comment	Southern Water response
	would then only be needed to prevent use of drought. Southern Water's planned Havant Thicket/wastewater recycling scheme, delivering 60-90 Ml/d, is sufficient to meet all the future water supply needs in the Southampton and Portsmouth area. Provided its operating rules prioritise environmental benefits not cost saving, it will also allow early and substantial abstraction reductions in the Rivers Itchen, Test and other chalk streams; action, which is urgent, should not wait until the SESRO becomes available, optimistically, in the late 2030s.gThe T2ST scheme gnd Southern Water's 30% share in SESRO would have a capital cost of at least £1.6 billion. Its assessed benefits for the Rivers Itchen and Test are only £29 million. The T2ST pipeline would have adverse impacts on the North Wessex Downs AONB, several protected sites and several ancient woodlands, which offset the minimal benefits for the Rivers Itchen and Test (where other, more cost effective, actions, such as water quality improvements, would have a far greater impact).aThe plan for a Thames to Southern transfer scheme should be abandoned because of its small benefits, excessive cost, environmental impact and the perverse proposal to export a large amount of water out of the Thames valley, where it is most needed for public water supplies, and the protection of much more heavily over-abstracted chalk streams than the Rivers Itchen and Test. The infrequent and short-term impacts of using drought orders could and should be mitigated by a programme of extensive habitat and water quality improvements, and, for example, by moving some lower Itchen abstractions 10 km downstream, using some of the £1.6 billion saved by scrapping the T2ST. The plan for a Thames to Southern transfer scheme should be abandoned because of its small benefits, excessive cost, environmental impact and the perverse proposal to export a large amount of water out of the Thames valley, where it is most needed for public water supplies, and the protection of much more heavily over-abstracted chalk streams than the Rivers Itchen and Test. The infrequent and short-term impacts of using drought orders could and should be mitigated by a programme of extensive habitat and water quality improvements, and, for example, by moving some lower Itchen abstractions 10 km downstream, using some of the £1.6 billion saved by scrapping the T2ST. The plan for a Thames to Southern transfer scheme should be abandoned because of its small benefits, excessive cost, environmental impact and the perverse proposal to export a large amount of water out of the Thames valley, where it is most needed for public water supplies, and the protection of much more heavily over-abstracted chalk streams than the Rivers Itchen and Test. The infrequent and short-term impacts of using drought orders could and should be mitigated by a programme of extensive habitat and waWhile CPRE Oxfordshire fully support the restoration and protection of chalk streams right across the SE it must be recognised that the construction and management of the SESRO will cause immense environmental and social damage. There are also huge risks, physical, financial and environmental, associated with the reservoir and we believe there are cheaper and more environmentally friendly pathways to improve the chalk streams (and other water courses) across southern Britain.a Yours sincerely Water Advisor, CPRE Oxfordshire	

Reference	Comment	Southern Water response
WRMPSV66	Too many leaks fixing the leaks would give us the water we need. Recycling sewage is dangerous and unacceptable with the risk of leakage into our harbours.	Thank you for taking the time to review our plan and provide feedback. We plan to reduce leakage by 53% by 2050, which exceeds the 50% leakage reduction target set by the Government. However, this will not be sufficient to meet future water needs. We will use latest technology and best practice to ensure that recycled water meets the strict UK drinking water standards.
WRMPSV67	Crap to tap is a horrendous solution when we still can do other fixes: — Separating water from sewage water everywhere, but especially in new homes — Using chalk stream water as a last resort — Southern Water, a privately held company, should not be dictating our drinking water options. DEFRA should have plans if it's own. —Southern Water has consistently failed to deliver on its current operations as proven by its fines and our contaminated waterways. It's scandalous.	Thank you for taking the time to review our plan and provide feedback. We need the opposition to water recycling. – We agree that grey water recycling in new homes should be encouraged but it is not up to Southern Water to enforce it. – Our plan looks to eliminate reliance on chalk streams during droughts once we have delivered the HWTWRP. – WRMPs are statutory plans that we are required to produce at least every 5 years under the Water Industry Act 1991 – We acknowledge that our performance in recent years has at times fallen below expectations. We are trying hard to rectify that.
WRMPSV68	I am concerned about the location of the recycling plant and the potential for contamination from disturbed elements below the plant. It would be interesting to understand how this risk might be mitigated.	Thank you for taking the time to review our plan and provide feedback. We are undertaking a range of environmental assessments, as part of the EIA process, to understand the potential effects of the Project on the environment. We have prepared a Preliminary Environmental Information Report (HWTWRP_PEA), which is a key part of the EIA process, and formed part of our Summer 2024 Consultation documentation. The Preliminary Environmental Information Report details the preliminary findings of our environmental assessments based on the information available to date. Our environmental assessments will continue to be updated and will be documented in an Environmental Statement that will be submitted as part of the Development Consent Order application. Pollution control measures will be used to mitigate the risk from contamination.
WRMPSV69	All of these are about customers bearing costs with no commitment by Southern to improve leakage, pipe repairs, or to stop dividends when leakage or sewage overflow targets are missed. Shareholders still make money whilst customers pick up the tab to pay interest costs to cover obscene loans taken out to pay more dividends.	Thank you for taking the time to review our plan and provide feedback. We plan to reduce leakage by 53% by 2050, which exceeds the 50% leakage reduction target set by the Government. Our dividends are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest.

Reference	Comment	Southern Water response
WRMPSV70	We have been following Southern Water's commitment to exploring alternative water sources to address the growing challenges of water scarcity in the UK, particularly in light of recent droughts and climate change. Norway is renowned for its pristine natural environment and abundant freshwater resources. Our glacial waters are among the purest in the world, untouched by human activity and pollution. Given the increasing demand for reliable and sustainable water supplies, we believe that Norwegian glacial water could offer a compelling solution for Southern Water. We propose a strategic partnership where we would supply Southern Water with bulk shipments of high-quality glacial water on a weekly basis. Our shipments would be transported in environmentally friendly vessels, ensuring a minimal carbon footprint. Key benefits of our proposal: Unmatched purity: Our glacial water is sourced from pristine, glacier-fed lakes, providing an exceptionally pure and refreshing product. Reliable supply: Norway's abundant water resources guarantee a stable and consistent supply throughout the year. Sustainability: Our operations prioritize environmental sustainability, from water sourcing to transportation. Economic benefits: By partnering with us, Southern Water can secure a reliable and long-term water supply, while contributing to the economic development of both nations. We would welcome the opportunity to discuss this proposal in more detail and explore how our Norwegian glacial water can address Southern Water's specific needs. Please feel free to contact me at your earliest convenience to arrange a meeting or call.	We thank Norwegian Premium Water AS for its feedback. Our plan includes the option of bulk import of water from Norway via sea tankers. As we have mentioned in our plan (Annex 20 to our rdWRMP24 Technical Report), there are technical, logistical and commercial challenges that need to be overcome but we are happy to talk to any supplier to discuss this further.
WRMPSV71	Southern Water's plan fails to consider the strategic water resource impact of exporting water out of the Thames valley, where it is most needed for public supplies and for reducing abstraction in Thames valley chalk streams that are far more heavily abstracted than the Rivers Itchen and Test (see Section 3.7 of response report). The WRMP documentation fails to make clear that the T2ST plus SESRO has been proposed to achieve only an occasional small benefit to the Rivers Test and Itchen and it is not needed to provide resilient public water supplies in times of population growth and climate change. There is no consideration of whether the small and short-term benefits to the ecology of the Rivers Test and Itchen in very occasional droughts justify the impacts of construction of the T2ST plus SESRO on the local communities and environment in the SESRO area and along the pipeline route. There is no consideration of whether it is right to solve a perceived local environmental problem by creating new environmental problems elsewhere. These are topics that should have been prominently raised in the consultation Questionnaire and the WRMP should have included transparent evidence of the ecological benefits of the	We thank GARD for the feedback. We presume the comment about export of water from the Thames valley refers to T2ST. If our presumption is correct then we would like to point out the volume supplied through T2ST will be the water that is surplus to Thames Water's needs. It does not disadvantage Thames Water customers in any way. It is incorrect to suggest that T2ST and SESRO are primarily being developed to offset the sustainability reductions in our abstractions from the rivers. T2ST is a key part of our plans to develop a resilient supply network going forward but the reductions in our licences on the rivers Test and Itchen are being addressed through the development of the Havant Thicket Reservoir and the HWTWRP. Reports regarding T2ST, submitted to RAPID as part of its gated process, are available on the Thames Water website (Water transfer from Thames Water to Southern Water).

Reference	Comment	Southern Water response
	T2ST. This would have allowed responders to the consultation to express informed views on whether the benefits justify the £1.6 billion cost and the environmental impacts of building the T2ST pipeline and SESRO. We note Southern Water's parlous financial state. Given this, we find it incredible that the draft WRMP proposes to spend £1.6 billion on the unnecessary T2ST and 30% share of SESRO. This £1.6 billion may well be the difference between Southern Water's survival and its bankruptcy. Furthermore, it is all the more incredible given that the perceived environmental benefits of the schemes are only assessed at £29m (see Section 4.5 of response report).	We note your comment about Southern Water's financial position and respectfully disagree. We are financially resilient and maintain a strong liquidity position, with the strong backing of our shareholders who have injected more than £1.6 billion of fresh equity into the Southern Water group since they joined in 2021. This financing has allowed us to spend £3bn during 2020-25 (or £1,500 per household) and implement our Turnaround Plan, to deliver for our communities and the environment. We acknowledge the ongoing challenges and uncertainty faced by all companies operating in the UK water and wastewater sector, but we are confident in our ability to deliver what we have set out in our future investment plans.
WRMPSV72	Only to point to the issue of governance in my opening remarks. This is not an issue just for the water company to solve. Government sets the parameters, and I do not think they are yet right. And we all have a part to play on the demand side, just like we do on wastewater management. While my focus has been largely related to the proposals on the Isle of Wight I also support the broader comments made by the Solent Protection Society and have also commented on some aspects of the overall Southern Water proposal.	Thank you for taking the time to review our plan and provide feedback. We agree with the view that we all have a role to play in ensuring that water is used efficiently in homes a businesses. We have responded to your additional comments in earlier sections of this document.
WRMPSV73	This is not an issue just for the water company to solve. Government sets the parameters, and I do not think that they are yet right. And we all have a part to play on the demand side, just as do on wastewater management. While my focus has been largely related to the proposals on the Isle of Wight I also support the broader comments made by the Solent Protection Society.	Thank you for taking the time to review our plan and provide feedback. We agree with the view that we all have a role to play in ensuring that water is used efficiently in homes a businesses. We have responded to your additional comments in earlier sections of this document.
WRMPSV75	The plan to source water from the Thames Valley is ludicrous. Fix your leaks and reduce consumption and store locally if you absolutely have to.	Thank you for taking the time to review our plan and provide feedback. We note your opposition to bulk import of water from Thames Water via T2ST. We plan to reduce leakage by 53% by 2050, which exceeds the 50% leakage reduction target set by the Government. Similarly, we aim to reduce PCC to 110 litres per person per day by 2045, five years ahead of the date set by the Government. We are building the Havant Thicket Reservoir in Hampshire, jointly with Portsmouth Water. Our plan also includes the River Adur Offline Reservoir in Sussex.
WRMPSV76	Use and store natural water which is in abundance not to use recycled waste water propose greener and more cost effective solutions high maintenance cost to run, monitor and maintain desalination and recycled waste water, explore option of more storage of natural water is the carbon foot print of importing water considered? support rainwater harvesting for new built residential and commercial schemes.	Thank you for taking the time to review our plan and provide feedback. Our plan includes three storage reservoirs (Havant Thicket Reservoir, SESRO and River Adur Offline Reservoir) over the next 20 years

Reference	Comment	Southern Water response
WRMPSV77	I support the Havant Thicket re-cycling scheme to help mitigate the need to abstract from rivers and acquifers.	Thank you for taking the time to review our plan and provide feedback. We are pleased to note your support for the HWTWRP.
WRMPSV78	The plan to import water from the proposed new reservoir in Thames Water area Steventon/Drayton is totally wrong. As propsed reservoir will according to TW will increase the water table by 1 metre. Since Sept i live in a nearby village where flooding has resulted in homes being damaged and local school closing for 2 days. This is before thereservoir is built. Dont see why we have to suffer for Souther Waters inefficiencies.	Thank you for taking the time to review our plan and provide feedback. We note your opposition to SESRO. Southern Water is not the only beneficiary of SESRO; customers of Thames Water and Affinity Water will benefit from the reservoir too.
WRMPSV79	Re. Question 1: It is claimed (Summary p. 26), without any cogent supporting evidence, that the option to reduce demand by reducing leaks has the disadvantage that 'The more leakage is reduced, the harder and more expensive it becomes to find the remaining leaks' so that 'Further reduction in leakage will be dependent on new technology being developed' - which would appear to impose an arbitrary limit on what can be achieved beyond the 2050 target. Reducing demand by encouraging customers to use less water is similarly claimed to have disadvantages in that it is 'reliant on people taking action and maintaining a lower level of water use' , whereas retrofitting homes with water-saving devices (such as flow-restricters) could ensure that reduced consumption levels are permanently secured by removing the need to rely on consumer behaviour. By contrast, it is claimed that the option of increasing supply by building new reservoirs not only can provide a resilient water supply but 'long-term benefits to communities and the economy such as new leisure and recreational facilities' - which would appear to be a justification of this option on economic grounds in the belief that this will succeed best with Government (as with other sectors arguing the need for new infrastructure).o Re. Question 2: The 'River Adur Offline Reservoir' is described as involving the 'construction of an earth embankment reservoir in Sussex with a proposed storage capacity of up to 4,600Ml' (Technical Report p. 186), from which it would appear that respondents are being asked to endorse storage options of a similar type (namely large, above-ground river-filled reservoirs), whereas lower land-take, more environmentally-sensitive alternatives could include underground storage and managed acquifer-recharge schemes. Re. Question 3: The delivery dates of several schemes in the Central and Western areas having been delayed so as to 'provide benefit' at later dates, it is admitted that these delays will necessitate taking more water from the natural environment up to 2033-34 (2041?) through 'continued reliance on drought permits and orders in Hampshire during periods of severe drought' (Technical Report p. 23), which would adversely impact the region's chalk streams and rivers should such droughts occur during the extended period.	Thank you for taking the time to review our plan and provide feedback. Re Question 1 We stand by the statements in the plan. We plan to hold leakage steady after 2050 despite increase in connections due to growth. Re Question 2 Our plan includes an MAR scheme we intend to explore ASR/MAR options for our next plan. Re Question 3 Yes, the delay in the delivery of the Havant Thicket Reservoir and the HWTWRP does mean that we will have to rely on drought options in Hampshire up to 2034 instead of 2030. We acknowledge that this is not a desirable outcome and we have tried to mitigate the risk. Re Question 4 We note your approval of developing option that benefit the wider region as a whole. Options will lower environmental metrics scores are selected when there is no alternative option with higher environmental metrics scores that can provide an equivalent volume at the same time. Re Question 6 We are pleased to note your support for our demand management strategy.

Reference	Comment	Southern Water response
	Re. Question 4: It is welcome that the draft WRMP has been informed by the WRSE regional plan which selects those options offering 'best value', taking into account the wider benefits that the options will deliver as well as their financial cost, with metric scores assigned to each option to ensure that 'a best value decision-making process is used to decide which options should be delivered for each Supply-Demand situation' (Summary p. 11). It is however evident that cost and resilience of supply are scored as more important objectives than protecting the environment, as indicated by the admission that, in order to 'achieve the projected supply-demand balance', the delayed delivery of several schemes in the Central and Western areas will until they become operational neccessitate continued reliance on drought permits in Hampshire 'as in terms of best value planning requirements this represents the best value option overall' (Technical Report p. 30). Re. Question 6: Although it is to be welcomed that it is sought to achieve the consumption reduction target five years earlier than the Government requires, it is evident that with greater domestic efficiency measures an even lower target could be achieved, given that in the North Sussex Water Resource Zone housebuilders are committed to building homes able to deliver an average 85 l/p/d (in order to help achieve the 'water neutrality' required of all new development there - with any exceedance compensated by retrofitting existing properties).	
WRMPSV80	I an strongly opposed to the proposal to take 30% of the water from the proposed sesro reservoir, to supply hampshire. The sesro plan was rejected previously because it was too big. The area is not suitable for a reservoir of 150bn litres, built on clay, with above ground walls up to 80 feet, metres away from properties. The area floods increasingly badly, yet Thames Water acknowledges that a reservoir of the size it is proposing will raise the local water table by a metre. The size of the proposed reservoir needs to be reduced significantly and/or other, cheaper, safer alternatives found. If supplying water to Hampshire is one of the reasons why the sesro design is now bigger and more dangerous than ever, then I object to the plan for southern water to take water from sesro in the strongest possible terms.	Thank you for taking the time to review our plan and provide feedback. We note your objection to SESRO in general and its use to supply Southern Water in particular.
WRMPSV81	I am unaware of the desalination project in the Havant area of Hampshire. I would like to fully understand the total package of proposals before I can commit to a decision about Southern Water's ""Revised Draft Water Resources Management Plan.	Thank you for your feedback. Our rdWRMP24 does not include any desalination plans in Hampshire.
WRMPSV82	My area of interest is the Test and Itchen catchments in Hampshire. I strongly agree with Southern Water's commitment, in line with government policy, to reduce water abstracted from our environment. The Test and Itchen (T&I) rivers are already over-licensed and over-abstracted, with insufficient resilience in times of drought. We need ""new"" water resources, such as that produced by wastewater recycling and desalination. When we	Thank you for taking the time to review our plan and provide feedback. We are pleased to note your support for water recycling in order to protect the rivers Test and Itchen during droughts.

Reference	Comment	Southern Water response
	consider that some 40% of our treated water is flushed down the toilet it seems absurd that this water is then lost to the catchment by discharge to the sea. With new housing and increasing population we are in a severely water-stressed situation in the T&I catchments. With a per capita water availability of around 500 m3/person/year we are classified as ""absolutely water scarce"", on a par with the Middle East and North Africa. Given this we need to adopt water supply and wastewater treatment and reuse technologies already proving in these and similar highly water stressed environments such as California and Australia. We CANNOT keep abstracting at current levels from the T&I catchments. It's a simple water balance exercise. The potential environmental damage during a drought period would be unacceptable. In addition, numbers of Atlantic salmon is declining due to low flow rates in the Test and Itchen rivers. We have to reverse this trend by leaving more water in these rivers and associated groundwater. The Hampshire Water Transfer and Wastewater Recycling Project (HWTWRP) is a major water resources project for Hampshire which needs to proceed on an expedited pathway. Delays to this and other planned schemes are not acceptable, and all measures should be taken to bring this project to fruition. Postulated alternatives by detractors are unquantified, uncosted and in many cases infeasible. These detractors fail to accept the seriousness of our water scarcity situation in Hampshire and the potential widescale damage to our aquatic environment that will result if Southern Water (SW) have to resort to Drought Order to meet human water demand during droughts. We know more droughts are coming, we need to act now to mitigate the harm they might cause. As noted in SW's 2024 WRMP alternative sources of new water are scarce, technically difficult (sometimes impossible) to develop, potentially costly and completely inadequate in quantity to address the anticipated 100 Ml/day water deficit in Hampshire. The limitation of MARS and ARS schemes is recognised in the document. Measures to reduce demand from 129 l/p/d to 110 l/p/d are dependent on a significant change in culture, such as has occurred in Australia and South Africa following recent severe droughts. Leakage reduction is possible up to the point of diminishing returns (probably around 20%). Cost considerations have to be a factor here - customers do not want leakage at any price, it has to be rational and cost-effective. In the longer term (2035-50) along with other water companies SW are relying on obtaining 120 Ml/d of ""new"" water resources from Thames Water's proposed Abingdon reservoir. The construction of this reservoir has been proposed and rejected several times over the years, and still faces significant hurdles. This uncertainty further highlights the need for the HWTWRP which in broad terms is a relatively straightforward engineering and management endeavour. The technology, originally developed in the UK, is tried and tested and management skills are available from international companies experienced in the development and management of these systems. It is likely that the HWTWRP will be a Build-Operate-Transfer project which will allay the concerns expressed by some that SW lack the skills at present to run such a scheme. To me there is NO reason why British engineers,	We will continue to explore ASR/MAR options for our next plan but the volumes available from any such schemes are likely to be much smaller than the volumes that can be obtained from recycling. Thames Water's WRMP24, which includes SESRO, has been approved by the Secretary of State for Defra. However, we agree that there still are challenges to be overcome. We welcome your support for bulk import from the Havant Thicket Reservoir.

Reference	Comment	Southern Water response
	managers and technicians should be any less able than Americans, Australians, South Africans, and French personnel to run such a scheme. The plan to transfer 21 Ml/d to SW from Portsmouth Water from the Havant Thicket reservoir by 2031 is welcomed, however this could/should be sooner. This transfer will enable SW to drop the Candover Drought Scheme (CDS) from their WRMP and forthcoming Drought Plan. This will be in accordance with the Section 20 agreement reached between SW and the Environment Agency in 2018. The CDS must be dropped from all planning and the scheme made redundant."	
WRMPSV83	Main issues of concern for me are: Discharges of dirty water into rivers and sea AND drinking water quality. Concerned these are not dealt with.	Thank you for taking the time to review our plan and provide feedback. Any water we put into supply will meet the strict UK drinking water standards. Regarding yours concerns about wastewater discharges, the steps we are taking to improve our wastewater performance are described in our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)).
WRMPSV84	I would like to see stronger measures to reduce the abstraction which continues to damage the iconic chalk Rivers Itchen and Test, and catchment groundwaters. This includes the Candover Augmentation pipeline. You need more urgency on projects to reduce abstraction, especially Havant Thicket / [redacted] Recycling schemes. Subject to assurances on the possibly more concentrated effluent to the Harbours from [redacted], I would strongly support SW on that scheme. As I read the WRMP, you are still relying on the use of drought orders to be able to abstract more in dry summers. Tankering from Norway, albeit meant as a back-stop, will be expensive and risks bio-security in our rivers. Aiming to reduce PCC is admirable, but alone it won't solve looming water shortages in our undeclared drought zone in SE England. Also urgently, Portswood WwTW and other infrastructure need to be upgraded to prevent the extinction of the remaining salmon in our rivers.	Thank you for taking the time to review our plan and provide feedback. We are trying to deliver the Havant Thicket Reservoir and the HWTWRP as soon as we can in order to eliminate the reliance on drought options in Hampshire. We note and welcome your support for HWTWRP. Our reliance on drought orders in Hampshire is only until the Havant Thicket Reservoir and the HWTWRP are delivered. We agree that reductions in PCC alone will not be sufficient. That is why we need to follow a twin-track approach using a combination of both demand-side and supply-side measures to meet future challenges. Regarding wastewater discharge from Portswood WwTW, the steps we are taking to improve our wastewater performance are described in our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)).
WRMPSV85	I do not agree with your plans to build effluent recycling plants at Havant, Horsham, Littlehampton and Sandown. This will be hugely costly (billions) and you will pass the costs to your customers. I am more concerned that this is a very carbon intensive way to treat water, since the plants will have huge energy requirements. This does not support Britain's net zero targets! They will also involve pipework across protected landscapes and release the recycled effluent into our already struggling rivers. I am particularly worried about the risks and environmental damage that will be caused at Langstone Harbour. It is hard to believe your plans to build on top of a landfill site and I very strongly object to this.	Thank you for taking the time to review our plan and provide feedback. We note your opposition to water recycling plants. We have recently launched a public consultation on the Sandown recycling project (Isle of Wight Water Recycling Project - Southern Water) having consulted the HWTWRP in summer 2024 (Home - Hampshire Water Transfer and Water Recycling Project). Southern Water has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. The site drainage is to be designed such that surface water runoff will be diverted

Reference	Comment	Southern Water response
	Whilst sympathetic to the problems of a water hungry public, I feel that you should not be using this unnecessary solution, but instead making clearing up the hugely wasteful leaks and replacing mains pipes your main priority; followed by use of small storage reservoirs, and river abstraction further downstream to protect the rivers. You should also reduce the earnings of top management and shareholders until results are achieved. Your plan has the right aims but the wrong solutions."	to sustainable drainage features that attenuate and improve the quality of the flow to environment, without soaking into the landfill, therefore reducing the leachate production attributed to rainfall. The potential impacts of the HWTWRP have been covered in the preliminary environment assessment report that was issued as part of the consultation in summer 2024 (HWTWRP_PEA). We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response. We held a further consultation on water quality for HWTWRP in Spring 2025. This included details of the likely impacts of the project on water quality in Havant Thicket reservoir and the Solent and potential mitigations. The Environmental Statement to the DCO for HWTWRP will report on the full EIA including water quality and contaminated land and this will be available to the public when the application is accepted and they can participate in the DCO process. We have an ambitious demand management programme. We plan to reduce leakage by 53% by 2050. This exceeds the 50% leakage reduction target set by the Government. Similarly, we plan to reduce PCC to 110 litres per person per day by 2045; 5 years ahead of the date set by the Government. However, demand savings alone will not be enough to provide the additional water we need in the future. We need options to increase supply as well in order to meet future supply-demand balance challenges.
WRMPSV86	Recycled water to drink is not right. There are other ways to get drinking water.	Thank you for taking the time to review our plan and provide feedback.
WRMPSV88	I totally object to any effluent recycling plants, especially ones built on contaminated land next to the harbour, which would need piling and create a massive risk of leaching. I totally object to a raw water fed reservoir being topped up with recycled effluent, accidents all too often happen, just like they have recently in Winchester and West Sussex where the water supply was contaminated, its not worth the risk, it could ruin the reservoir. I want all the 'parked' water sourcing options as a first resort, they are cheaper, quicker, and more environmentally friendly with much less risk. Please fix all leaks first, use water storage sites, extract at the lowest possible sites on rivers, build more naturally fed only reservoirs, and use desalination as a last resort, I realise it's energy heavy but no where near as bad as the energy required to pump recycled effluent 40kms uphill. If possible raise rates for water supply over the 110ltrs per person per day target, also offer the free water butt scheme to the whole region, it's crazy that we use drinking water to water gardens.	Thank you for taking the time to review our plan and provide feedback. We note your objections to water recycling plants. We do not understand your reference to ‘parked’ water. We have an ambitious demand management programme. We plan to reduce leakage by 53% by 2050. This exceeds the 50% leakage reduction target set by the Government. Similarly, we plan to reduce PCC to 110 litres per person per day by 2045; 5 years ahead of the date set by the Government. However, demand savings alone will not be enough to provide the additional water we need in the future. We need options to increase supply as well in order to meet future supply-demand balance challenges.
WRMPSV89	You all need to do better to increase sewage capacity and STOP DUMPING SEWAGE IN OUR WATERWAYS!	Thank you for taking the time to review our plan and provide feedback. We refer you to our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)) which describe the steps we are taking to improve our wastewater performance

Reference	Comment	Southern Water response
WRMPSV90	Some of these questions are clearly complex and require detailed knowledge to make a balanced judgement. This is true q nos 1,2,7,8. For example, i'd wish to see the carbon costs q 7+8, the pros + cons q 2; and sufficient data for 1. Thank you - v useful + helpful.	Thank you for taking the time to review our plan and provide feedback. Your comments are noted.
WRMPSV91	I strongly agree with Southern Water's commitment, in line with government policy, to reduce water abstracted from our environment. The Test and Itchen (T&I) rivers are already over-licensed and over-abstracted, with insufficient resilience in times of drought. We need ""new"" water resources, such as that produced by wastewater recycling and desalination. With new housing and increasing population we are in a severely water-stressed situation in the T&I catchments. With a per capita water availability of around 500 m3/person/year we are classified as ""absolutely water scarce"", on a par with the Middle East and North Africa. Given this we need to adopt water supply and wastewater treatment and reuse technologies already proving in these and similar highly water stressed environments such as California and Australia. We CANNOT keep abstracting at current levels from the T&I catchments. It's a simple water balance exercise. The potential environmental damage during a drought period would be unacceptable. vThe Hampshire Water Transfer and Wastewater Recycling Project (HWTWRP) is a major water resources project for Hampshire which needs to proceed on an expedited pathway. Delays to this and other planned schemes are not acceptable, and all measures should be taken to bring this project to fruition. Postulated alternatives by detractors are unquantified, uncosted and in many cases infeasible. These detractors fail to accept the seriousness of our water scarcity situation in Hampshire and the potential widescale damage to our aquatic environment that will result if Southern Water (SW) must resort to a Drought Order. 1 dry winter and we are in trouble, 2 successive dry winters would be catastrophic. As noted in SW's 2024 WRMP alternative sources of new water are scarce, technically difficult (sometimes impossible) to develop, potentially costly and completely inadequate in quantity to address the anticipated 100 Ml/day water deficit in Hampshire. The limitation of MARS and ARS schemes is recognised in the document. Measures to reduce demand from 129 l/p/d to 110 l/p/d are dependent on a significant change in culture, such as has occurred in Australia and South Africa following recent severe droughts. Leakage reduction is possible up to the point of diminishing returns (probably around 20%). Cost considerations have to be a factor here - customers do not want leakage at any price, it has to be rational and cost-effective. The Hampshire Water Transfer and Wastewater Recycling Project (HWTWRP) is a major water resources project for Hampshire which needs to proceed on an expedited pathway. Delays to this and other planned schemes are not acceptable, and all measures should be taken to bring this project to fruition. Postulated alternatives by detractors are unquantified, uncosted As noted in SW's 2024 WRMP alternative sources of new water are scarce, technically difficult (sometimes impossible) to develop, potentially costly and completely inadequate in quantity to address the anticipated 100 Ml/day water deficit in Hampshire. The limitation of MARS and ARS schemes is recognised in the document. Measures to reduce	Thank you for taking the time to review our plan and provide feedback. We are pleased to note your support for water recycling in order to protect the rivers Test and Itchen during droughts. We will continue to explore ASR/MAR options for our next plan but the volumes available from any such schemes are likely to be much smaller than the volumes that can be obtained from recycling. Thames Water's WRMP24, which includes SESRO, has been approved by the Secretary of State for Defra. However, we agree that there still are challenges to be overcome. We welcome your support for bulk import from the Havant Thicket Reservoir.

Reference	Comment	Southern Water response
	demand from 129 l/p/d to 110 l/p/d are dependent on a significant change in culture, such as has occurred in Australia and South Africa following recent severe droughts. The plan to transfer 21 Ml/d to SW from Portsmouth Water from the Havant Thicket reservoir by 2031 is welcomed, however this could/should be sooner. This transfer will enable SW to drop the Candover Drought Scheme (CDS) from their WRMP and forthcoming Drought Plan. This will be in accordance with the Section 20 agreement reached between SW and the Environment Agency in 2018. The CDS must be dropped from all planning and the scheme made redundant.	
WRMPSV92	Against the Abingdon reservoir, the location should be a flood storage. If TW wants to build a reservoir, such reservoir should be in the river flow and serve as storage for flood. In recent years, climate change has proven to bring more water than the opposite, Abingdon residente have been flooded 3 times this year and the reservoir will reduce the water storage on the floodplain and further increase the flood risk.	Thank you for taking the time to review our plan and provide feedback. SESRO is being developed by Thames Water with support from Southern Water and Affinity Water. Thames Water consulted on the project in summer 2024. More information about this can be found here (South East Strategic Reservoir Option (SESRO) - Thames Water Resources Management Plan).
WRMPSV93	Recycling treated water back into the reservoir being built at Havant gives me no confidence with your track record, also I feel that the water companies have no regard for the environment and only care about profit. You need to focus on leaks and dealing with sewage, you can not continue to exploit the environment. You submitted a plan to build a reservoir in Havant which basically will supply other parts of the county and fill it with treated sewage water! I would also like to print out that when you sold this to planners you advertised the reservoir as a destination and an improvement to the local environment which is not the case. Ultimately you only care about shareholders and profit, not customers or the environment!!!	Thank you for taking the time to review our plan and provide feedback. Our dividends are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest. Southern Water is not making a profit. We have actually registered losses in the last two accounting years, as we invest more in our networks than we previously pledged to. Protecting and, where possible, enhancing the environment is a key driver for our plan.
WRMPSV94	Brown water for flushing loos in new build. Water usage labeling on appliances.	Thank you for taking the time to review our plan and provide feedback. We are planning with local planning authorities and developers in our area to build water efficient homes. Our demand management plan incorporates savings from Government-led initiatives. Water-use labelling of devices is one of those initiatives.
WRMPSV95	Water metering should be mandatory for all, with much higher costs for those with excessive usage (eg. private pools in residential homes). The consumption reduction targets are not ambitious enough. Desalination and shipping from Norway are very energy intensive and are not compatible with a climate emergency. We must reduce consumption to a sustainable level. Wastewater recycling is fine so long as standards are maintained. I am not convinced limits and monitoring of chemicals (eg. drugs, flea treatment, PFAS) are adequate."	Thank you for taking the time to review our plan and provide feedback. We initiated a universal metering programme in 2010 which saw our household meter penetration increase to 87%. 93% of our non-households are metered. We note your comments about desalination and bulk import of water from Norway. We have an ambitious demand management programme. We plan to reduce leakage by 53% by 2050. This exceeds the 50% leakage reduction target set by the Government. Similarly, we plan to reduce PCC to 110 litres per person per day by 2045; 5 years ahead of the date set by the Government. However, demand savings alone will not be enough to provide the additional

Reference	Comment	Southern Water response
		water we need in the future. We need options to increase supply as well in order to meet future supply-demand balance challenges.
WRMPSV96	Reducing leaks by 50% is a pathetic and totally inadequate target. Climate change has given us milder wet winters, but there is totally inadequate storage facilities for water. Why are you not working with house builders and government to ensure that grey water is used for flushing toilets, all houses are installed with a water butt, domestic waste water can be channelled in to gardens for use there?	Thank you for taking the time to review our plan and provide feedback. The leakage reduction target of 50% by 2050 has been set by the Government. We plan to exceed it by reducing leakage by 53%. Our plan includes reservoirs (Havant Thicket Reservoir, SESRO and River Adur Offline Reservoir). We are working with local authorities and developers to build more water efficient homes.
WRMPSV98	More publicity please	Thank you for taking the time to review our plan and provide feedback. Your comment is noted.
WRMPSV99	Other Concerns: The reject water, which is to be deposited into the Solent, in the case of Hampshire, into the surrounding sea at Littlehampton and Sandown and some unclear destination at Horsham. This will still contain contaminants and will have acquired yet more chemicals from the recycling process. This will be more concentrated, and the increase in temperature means it will float on the surface for some time. This is likely to affect the local ecology and, in the case of the Solent, some protected wildlife areas. Havant reservoir should not be used as an environmental buffer. An area of irreplaceable ancient forest is already destroyed. The quality of the treated water will inevitably alter the quality of the water in the reservoir, and this will change the biodiversity within it. In times of drought the concentration of recycled water will be greater, adding to the stress of the whole ecosystem. One of the benefits of the original reservoir plans was that it would store and settle and gradually neutralise nitrates running off surrounding farmland. This would reduce the level of nitrates entering the Solent. This benefit would be lost if these recycling effluent plans are adopted. Building the recycling plant on the Broadmarsh landfill site seems very high risk. As piles will have to be driven through this landfill, which is unlined and contains a range of domestic and industrial waste, there is a serious danger of a large increase of this waste leaching into Langstone Harbour. Moreover, the construction period means that inevitably the internationally important populations of winter migrant birds9 will be disturbed. I feel data is being misused to justify a major level of infrastructure. SW project a 25% population growth by 2050 in this area. However, the Office of National Statistics forecast a growth of 6-12%.	Thank you for taking the time to review our plan and provide feedback. We note the concerns around locations of reject water discharge associated with water recycling schemes. The reject water will typically be discharged through existing long sea outfalls for wastewater discharges. The proposed discharge locations for Sandown and the HWTWRP can be seen here (Isle of Wight Water Recycling Project - Southern Water and Home - Hampshire Water Transfer and Water Recycling Project). Southern Water and Portsmouth Water are working together to investigate the possible effects on water quality within Havant Thicket Reservoir based on various operational scenarios. This analysis is ongoing with further engagement on the results to come later. Our assessments will also be fully reported on in our Environmental Statement, which will be submitted as part of our application for development consent. Southern Water has purchased “Site 72”, an industrial site which includes former landfill, near Portsmouth Harbour WTW as the proposed location for the water recycling plant. We intend to locate all of the process plant above ground on foundations piled down to firm strata below the landfill. The site drainage is to be designed such that surface water runoff will be diverted to sustainable drainage features that attenuate and improve the quality of the flow to environment, without soaking into the landfill, therefore reducing the leachate production attributed to rainfall. The potential impacts of the HWTWRP have been covered in the preliminary environment assessment report that was issued as part of the consultation in summer 2024 (HWTWRP_PEA). We have provided further insight into our decision-making on site selection, risk consideration and mitigation measures in our main report to the statement of response. We have not based our WRMP24 on a single population growth forecast. As we have explained in our plan, we have considered 9 different supply-demand balance scenarios and

Reference	Comment	Southern Water response
	Is SW really able to deliver such complex plans safely and effectively? They have a history of fines, including a record £90 million fine in 202110. Last winter residents near me in Barnham, suffered weeks of flooding and sewage overflow 11. Residents had to be supplies with water from tankers as their tap water was unsafe. This area suffers highly regular sewage overflows, and these are not decreasing12. "	different population growth scenarios have been considered for developing the 9 situations (see Figure 5.29 in our rdWRMP24 Technical Report). We acknowledge that our performance over recent years has sometimes fallen below expectations. We are working hard to rectify that. For issues with flooding and sewer overflows, we refer you to our Drainage and Wastewater Management Plans (Our Drainage & Wastewater Management Plans (DWMPs)) that describe the work we are carrying out to improve our wastewater performance.

3 Key outcomes from the survey

- The respondents were nearly equally split on whether or not we have struck the right balance between supply-side and demand-side options. However, there is strong support for demand management, reducing both leakage and PCC.
- Some respondents wanted us to go further on leakage. As we have stated in our response to these respondents, our leakage target is based on savings that can realistically be achieved with existing technologies. We will be looking at emerging and new technologies in this field with the aim of using them if they can deliver quicker and/or greater reductions in leakage going forward.
- There was also strong support for reducing demand during droughts through restrictions on use.
- Although there was strong support for building reservoirs to improve resilience, some respondents raised concerns about SESRO. While some respondents opposed it based on its potential environmental impacts and perceived flooding risk, a group of respondents additionally opposed it on the grounds that it is primarily being built to offset the sustainability reductions implemented on our abstraction licences on the rivers Test and Itchen by providing water to Hampshire through the Thames to Southern Transfer (T2ST).
- There was support for reducing our current level of abstractions. In terms of options to make up for the loss of water through these reductions, particularly during drought. Desalination was supported by over 60% of the respondents. High operating and carbon cost of desalination was the most frequently given reason for not supporting desalination.
- Water recycling was less preferred with 48% of the respondents supporting it. A major concern around water recycling was that the water produced would not be safe for human consumption.
- A number of respondents wanted us to look at MAR and ASR schemes and build more reservoirs to capture winter rain instead of building desalination and water recycling plants.
- Bulk import of sea tankering from Norway was the least preferred option with only 19% supporting it outright and 32% supporting it with reservations. A third (33%) of the respondents objected to it.

3.1 Changes to the plan in view of the survey responses

We are not planning to make any changes to the plan in terms of scheme selection to meet future supply-demand balance challenges. However, it is clear that we need to provide a more robust justification for the need of water recycling and desalination options in our plan and better address some of the concerns around these options, particularly around safety of recycled water. Most of the information is already in the public domain through dedicated websites for the HWTWRP and Sandown recycling option. It needs to be better signposted in our plan.

4 Feedback received as a result of group action

In total, we received 1,176 representations on our rdWRMP24. These included members of the public, councils, government bodies and interest groups. The members of the public who responded comprise two main groups:

- Group 1: Feedback from the members of the public as a result of a group action
- Group 2: Feedback from the members of the public in their individual capacities

We received 618 representations, as part of a group action coordinated by WildFish. This was mentioned by a few of the respondents. A standard text with six main points appears to have been circulated with recipients advised to individually submit it in response to Southern Water's consultation on its rdWRMP24. In addition to the six main points, there was also an option to insert additional comments before submission. There were 3 sub-groups of respondents in this group:

- Sub-group 1: This comprises of 163 respondents who submitted the standard response without adding any comments. As 17 of these respondents numbered their responses 1-7 without using the number 4, we have split into two further categories:
  a. Respondents who submitted the standard response with the six key points numbered from 1 to 6. There were 146 respondents in this group.
  b. Respondents who submitted the standard response with the key points numbered from 1 to 7 with the number 4 missing from the numbering. There were 17 respondents in this group.
- Sub-group 2: This comprises of 364 respondents who submitted the standard response without adding any comments. As 317 of these respondents numbered their responses 1-7 without using the number 4, we have split into two further categories. The difference between this sub-group and the one above is they however did not remove the text giving them the option to insert additional comments.
  c. Respondents who submitted the standard response with the six key points numbered from 1 to 6. There were 47 respondents in this group.
  d. Respondents who submitted the standard response with the key points numbered from 1 to 7 with the number 4 missing from the numbering. There were 317 respondents in this group.
- Sub-group 3: This comprises of 91 respondents who provided comment(s) in addition to the six main points.

In responding to sub-groups 1 and 2, we have reproduced the text of the feedback only once but have included references to all respondents who submitted the response. Our responses to customers in sub-groups 1a (**Error! Reference source not found.**), 1b (Table 13), 2a (Table 14) and 2b (Table 15) are identical but we have put them in separate tables for transparency and completeness.

In our responses to sub-group 3, we have responded to the additional comments, where needed, in addition to the standard six points (Table 16). A number of the comments mentioned the amount of water we take from chalk streams. Based on the comments, we believe these are primarily directed at our abstractions from the rivers Itchen and Test in Hampshire. In order to provide context to our responses to these comment, we have shown the recorded abstraction data from the two rivers in Figure 10, Figure 11 and Figure 12. Over the years, there have been changes in the way abstraction from the River Test is recorded. The data presented for the River Test in Figure 11 and Figure 12 is based on one set of meters up to 2017-18 and from a different set of meters from 2017-18 onward.

As can be seen from these figures, there has been no net increase in the volume of water we have taken from these rivers since 2003. A linear trend across the data shows a slight lowering in both cases.

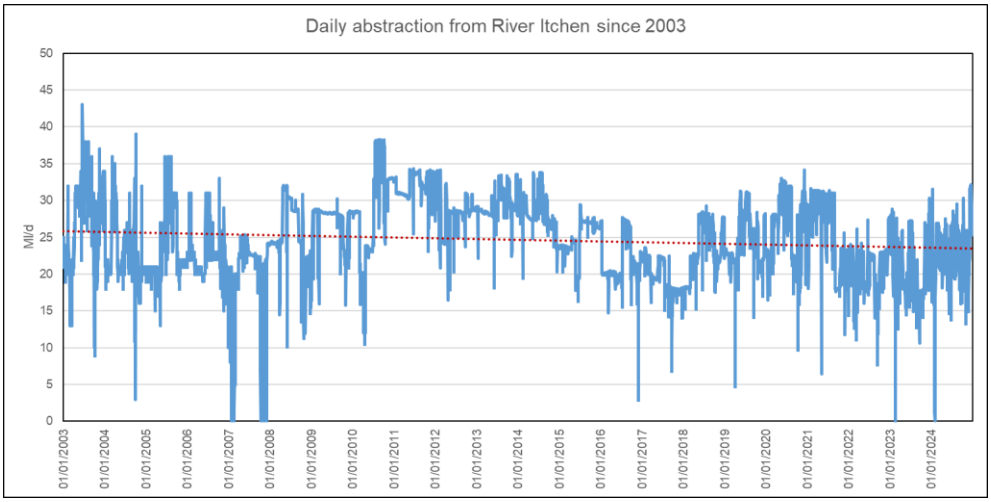

Figure 10: Recorded volume taken from the River Itchen, in million litres per day (Ml/d), for the period 01/01/2003 to 31/12/2024.

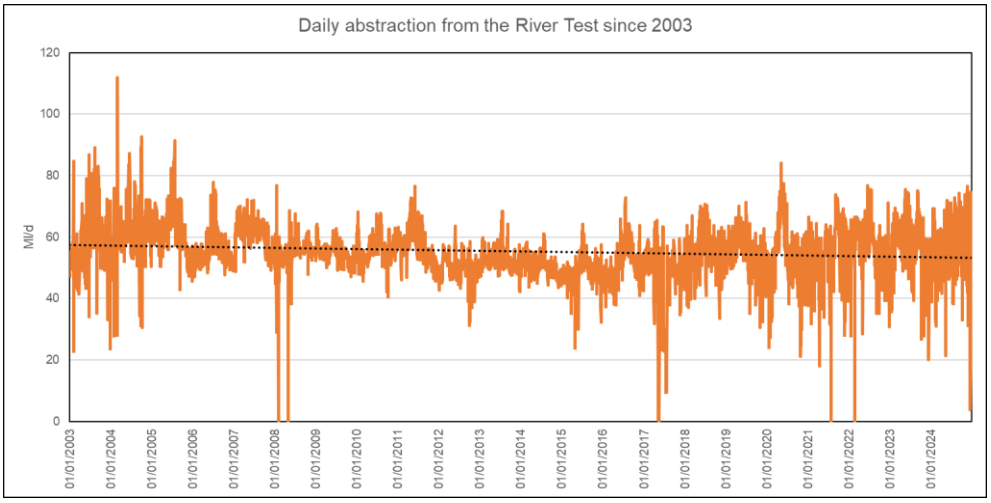

Figure 11: Recorded volume taken from the River Test, in million litres per day (Ml/d) for the period 01/01/2003 to 31/12/2024.

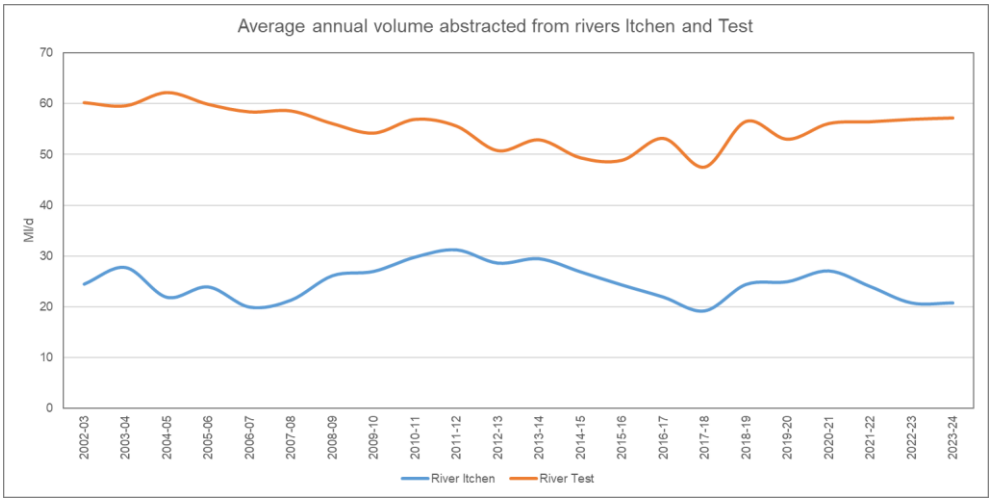

Figure 12: Average annual volume of water taken from the rivers Itchen and Test in million litres per day (Ml/d).

Table 12: Feedback from sub-group 1a and our response.

Reference	Feedback	Southern Water response
WRMP503; WRMP518; WRMP520; WRMP523; WRMP528; WRMP530; WRMP531; WRMP533; WRMP534; WRMP542; WRMP543; WRMP544; WRMP549; WRMP550; WRMP551; WRMP553; WRMP554; WRMP555; WRMP556; WRMP557; WRMP558; WRMP559; WRMP560; WRMP561; WRMP562; WRMP565; WRMP566; WRMP567; WRMP568; WRMP569; WRMP570; WRMP571; WRMP572; WRMP573; WRMP574; WRMP575; WRMP576; WRMP577; WRMP578; WRMP580; WRMP581; WRMP582; WRMP583; WRMP584; WRMP585; WRMP586; WRMP587; WRMP588; WRMP589; WRMP590; WRMP592; WRMP593; WRMP594; WRMP595; WRMP596; WRMP598; WRMP599; WRMP600; WRMP601; WRMP602; WRMP603; WRMP605; WRMP606; WRMP607; WRMP608; WRMP609; WRMP610; WRMP611; WRMP613; WRMP615; WRMP616; WRMP617; WRMP618; WRMP620; WRMP621; WRMP622; WRMP623; WRMP624; WRMP625; WRMP626; WRMP627; WRMP628; WRMP630; WRMP632; WRMP633; WRMP634; WRMP635; WRMP636; WRMP637; WRMP638; WRMP639; WRMP641; WRMP642; WRMP643; WRMP644; WRMP645; WRMP647; WRMP648; WRMP650; WRMP651; WRMP652; WRMP653; WRMP654; WRMP655; WRMP656; WRMP657; WRMP658; WRMP659; WRMP660; WRMP661; WRMP662; WRMP663; WRMP664; WRMP665; WRMP666; WRMP667; WRMP668; WRMP669; WRMP670; WRMP671; WRMP672; WRMP673; WRMP674; WRMP675; WRMP676; WRMP677; WRMP678; WRMP680; WRMP682; WRMP683; WRMP687; WRMP689; WRMP691; WRMP692; WRMP693; WRMP694; WRMP695; WRMP697; WRMP698; WRMP699; WRMP701; WRMP729; WRMP791; WRMP563; WRMP715; WRMP719	Dear Mr Gosden, I am responding to Southern Water Services' (SWS) consultation of its Water Resource Management Plan (WRMP). I have found the consultation documents opaque and it is my view that far greater transparency of information is required. It is difficult to understand SWS's reasoning for its long delays in finding alternative supplies of water to stop it abstracting from sensitive chalk streams and aquifers. In particular: 1. There is a lack of transparency in the consultation as the documents lack high-level figures to explain the way in which predictions on supply, demand and deficit are made. 2. There is a lack of real commitment to long-term projects needed to ensure environmental protection from abstraction. For instance, the Water Recycling schemes and the use of the Havant Thicket Reservoir need to be brought forward with tighter time-frames. Southern Water should not be relying on taking water from the rivers and the aquifer. 3. There are no long-term “Plan B’s” in case the recycling and reservoir options are delayed or abandoned. This means huge risk to important chalk streams and their wild fish populations. 4. The plan is not consistent with promises made by the water company to the Environment Agency in 2018 to use “all best endeavours” to bring forward long-term water resource schemes to avoid the use of damaging drought permits and orders. 5. The environmental assessments, which describe the impact of the water resource schemes, are full of errors. They do not properly consider the impacts of increased abstraction on the chalk streams and their aquifers. 6. The environmental assessments do not deal with the consequences of the Environment Agency’s conclusions that there is a salmon “metapopulation” of fish in the southern chalk streams. It is my view that the plan fails on all fronts: clarity, deliverability, environmental assessment and environmental protection.	Thank you for taking the time to go through our plan. We value your feedback. We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 Technical Report. In addition, we also published a non-technical summary that highlighted key features of our plan. 1. Figure 2.1 in our rdWRMP24 Technical Report provided a simple overview of the WRMP development process. It shows how our forecasts of future supply and demand determine the scale of the supply-demand balance deficit we need to plan for. Figure 5.2 in our rdWRMP24 Technical Report showed the key components of our supply and demand forecasts and the development of future supply-demand balance scenarios in view of the uncertainties that are inherent in these forecasts. 2. The need to protect and enhance the environment is a key driver for our plan. It is leading to significant investments that are needed to ensure sustainable and uninterrupted supplies of water in all but the most extreme weather conditions. Water recycling schemes and reservoirs are large infrastructure schemes with significant lead times. We are trying to deliver them as quickly as we can but delays in some cases are beyond our direct control. As part of our Water Industry National Environment Programme (WINEP), we are investigating a number of our sources to ensure that the amount of water we are taking from rivers and aquifers is sustainable over the long-term. This includes reducing or completely terminating supplies from sources where necessary. 3. We have a very ambitious demand management programme that aims to exceed the targets set by the Government. We are aiming to reduce leakage by 53% by 2050 against the 50% reduction target set by the Government. Similarly, we aim to achieve a Per Capita Consumption (PCC) level of 110 litres per person per day by 2045, ahead of the 2050 date set by the Government. However, the scale of supply-demand balance we face, which is driven in large part by the need to reduce the amount of water we take from rivers and groundwater, requires us

Reference	Feedback	Southern Water response
	I urge you to consider the unacceptable and avoidable environmental impact these plans will have if not revised.	to additionally develop large infrastructure schemes such as water recycling plants and reservoirs. These schemes require a unique set of geological, geographical, hydrological and hydroecological conditions to be viable. The choice of locations for these types of schemes in therefore limited. We do however consider multiple options and, as part of our adaptive plan, are able to switch to alternative schemes in a number of cases. Our 2019 WRMP (WRMP19) included a large desalination plant on the West Southampton coast. As further investigation showed the scheme to have an unacceptably high environmental impact, we replaced that with the Hampshire Water Transfer and Water Recycling Project (HWTWRP) that we are now in the process of delivering by 2034. The WRMP is updated at least every 5 years and we review all options, including those that have previously not been considered feasible, to ensure that we have sufficient supplies for the future. The selection of the option to import water from Norway via sea tankers was part of our mitigation against delays to delivery of HWTWRP. 4. As part of our 2018 agreement with the Environment Agency under section 20 of the Water Industry Act 1991, we remain committed to using all best endeavours to deliver a long-term solution in Hampshire as soon as possible. We are not planning to use the Lower Itchen drought option post 2030 and the Candover drought option post 2034. The River Test drought option will only be used in a drought of more than 1-in-200 year severity post 2034. We are not planning to use any drought permits and orders to increase supplies across our supply area beyond 2041. 5. In the absence of any specific examples of errors, we are unable to respond to this comment. 6. The Environment Agency, among other respondents, has provided us with detailed feedback, including on our environmental assessments. We are updating our environmental assessments in view the feedback. These will be included in our final plan. We have noted your comment but respectfully disagree. We have developed our plan with a view to ensuring that we are able to deliver uninterrupted supplies of good quality water to our customers well into the future in all but the most extreme weather conditions while protecting and enhancing environment.

Table 13: Feedback from sub-group 1b and our response.

Reference	Feedback	Southern Water response
WRMP76; WRMP77; WRMP79; WRMP99; WRMP108; WRMP112; WRMP120; WRMP136; WRMP138; WRMP144; WRMP147; WRMP151; WRMP161; WRMP423; WRMP1052; WRMP1065; WRMP1072	Dear Mr Gosden, I am responding to Southern Water Services' (SWS) consultation of its Water Resource Management Plan (WRMP). I have found the consultation documents opaque and it is my view that far greater transparency of information is required. It is difficult to understand SWS's reasoning for its long delays in finding alternative supplies of water to stop it abstracting from sensitive chalk streams and aquifers. In particular: 1. There is a lack of transparency in the consultation as the documents lack high-level figures to explain the way in which predictions on supply, demand and deficit are made. 2. There is a lack of real commitment to long-term projects needed to ensure environmental protection from abstraction. For instance, the Water Recycling schemes and the use of the Havant Thicket Reservoir need to be brought forward with tighter time-frames. Southern Water should not be relying on taking water from the rivers and the aquifer. 3. There are no long-term “Plan B’s” in case the recycling and reservoir options are delayed or abandoned. This means huge risk to important chalk streams and their wild fish populations. 5. The plan is not consistent with promises made by the water company to the Environment Agency in 2018 to use “all best endeavours” to bring forward long-term water resource schemes to avoid the use of damaging drought permits and orders. 6. The environmental assessments, which describe the impact of the water resource schemes, are full of errors. They do not properly consider the impacts of increased abstraction on the chalk streams and their aquifers. 7. The environmental assessments do not deal with the consequences of the Environment Agency’s conclusions that there is a salmon “metapopulation” of fish in the southern chalk streams. It is my view that the plan fails on all fronts: clarity, deliverability, environmental assessment and environmental protection. I urge you to consider the unacceptable and avoidable environmental impact these plans will have if not revised.	Thank you for taking the time to go through our plan. We value your feedback. We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 Technical Report. In addition, we also published a non-technical summary that highlighted key features of our plan. 1. Figure 2.1 in our rdWRMP24 Technical Report provided a simple overview of the WRMP development process. It shows how our forecasts of future supply and demand determine the scale of the supply-demand balance deficit we need to plan for. Figure 5.2 in our rdWRMP24 Technical Report showed the key components of our supply and demand forecasts and the development of future supply-demand balance scenarios in view of the uncertainties that are inherent in these forecasts. 2. The need to protect and enhance the environment is a key driver for our plan. It is leading to significant investments that are needed to ensure sustainable and uninterrupted supplies of water in all but the most extreme weather conditions. Water recycling schemes and reservoirs are large infrastructure schemes with significant lead times. We are trying to deliver them as quickly as we can but delays in some cases are beyond our direct control. As part of our Water Industry National Environment Programme (WINEP), we are investigating a number of our sources to ensure that the amount of water we are taking from rivers and aquifers is sustainable over the long-term. This includes reducing or completely terminating supplies from sources where necessary. 3. We have a very ambitious demand management programme that aims to exceed the targets set by the Government. We are aiming to reduce leakage by 53% by 2050 against the 50% reduction target set by the Government. Similarly, we aim to achieve a Per Capita Consumption (PCC) level of 110 litres per person per day by 2045, ahead of the 2050 date set by the Government. However, the scale of supply-demand balance we face, which is driven in large part by the need to reduce the amount

Reference	Feedback	Southern Water response
		of water we take from rivers and groundwater, requires us to additionally develop large infrastructure schemes such as water recycling plants and reservoirs. These schemes require a unique set of geological, geographical, hydrological and hydroecological conditions to be viable. The choice of locations for these types of schemes in therefore limited. We do however consider multiple options and, as part of our adaptive plan, are able to switch to alternative schemes in a number of cases. Our 2019 WRMP (WRMP19) included a large desalination plant on the West Southampton coast. As further investigation showed the scheme to have an unacceptably high environmental impact, we replaced that with the Hampshire Water Transfer and Water Recycling Project (HWTWRP) that we are now in the process of delivering by 2034. The WRMP is updated at least every 5 years and we review all options, including those that have previously not been considered feasible, to ensure that we have sufficient supplies for the future. The selection of the option to import water from Norway via sea tankers was part of our mitigation against delays to delivery of HWTWRP. This option is no longer included in our fdWRMP24. 5. As part of our 2018 agreement with the Environment Agency under section 20 of the Water Industry Act 1991, we remain committed to using all best endeavours to deliver a long-term solution in Hampshire as soon as possible. We are not planning to use the Lower Itchen drought option post 2030 and the Candover drought option post 2034. The River Test drought option will only be used in a drought of more than 1-in-200 year severity post 2034. We are not planning to use any drought permits and orders to increase supplies across our supply area beyond 2041. 6. In the absence of any specific examples of errors, we are unable to respond to this comment. 7. The Environment Agency, among other respondents, has provided us with detailed feedback, including on our environmental assessments. We are updating our environmental assessments in view the feedback. These will be included in our final plan. We have noted your comment but respectfully disagree. We have developed our plan with a view to ensuring that we are able to deliver uninterrupted supplies of good quality water to our customers well into the future in all but the most extreme weather conditions while protecting and enhancing environment.

Table 14: Feedback from sub-group 2a and our response.

Reference	Feedback	Southern Water response
WRMP465; WRMP497; WRMP498; WRMP499; WRMP500; WRMP501; WRMP502; WRMP504; WRMP505; WRMP506; WRMP519; WRMP522; WRMP524; WRMP526; WRMP532; WRMP540; WRMP705; WRMP706; WRMP707; WRMP708; WRMP709; WRMP716; WRMP717; WRMP718; WRMP721; WRMP722; WRMP723; WRMP726; WRMP730; WRMP733; WRMP784; WRMP785; WRMP786; WRMP788; WRMP789; WRMP790; WRMP792; WRMP793; WRMP794; WRMP795; WRMP796; WRMP797; WRMP807; WRMP808; WRMP834; WRMP710; WRMP711	Dear Mr Gosden, I am responding to Southern Water Services' (SWS) consultation of its Water Resource Management Plan (WRMP). I have found the consultation documents opaque and it is my view that far greater transparency of information is required. It is difficult to understand SWS's reasoning for its long delays in finding alternative supplies of water to stop it abstracting from sensitive chalk streams and aquifers. In particular: 1. There is a lack of transparency in the consultation as the documents lack high-level figures to explain the way in which predictions on supply, demand and deficit are made. 2. There is a lack of real commitment to long-term projects needed to ensure environmental protection from abstraction. For instance, the Water Recycling schemes and the use of the Havant Thicket Reservoir need to be brought forward with tighter time-frames. Southern Water should not be relying on taking water from the rivers and the aquifer. 3. There are no long-term “Plan B’s” in case the recycling and reservoir options are delayed or abandoned. This means huge risk to important chalk streams and their wild fish populations. 4. The plan is not consistent with promises made by the water company to the Environment Agency in 2018 to use “all best endeavours” to bring forward long-term water resource schemes to avoid the use of damaging drought permits and orders. 5. The environmental assessments, which describe the impact of the water resource schemes, are full of errors. They do not properly consider the impacts of increased abstraction on the chalk streams and their aquifers. 6. The environmental assessments do not deal with the consequences of the Environment Agency’s conclusions that there is a salmon “metapopulation” of fish in the southern chalk streams. It is my view that the plan fails on all fronts: clarity, deliverability, environmental assessment and environmental protection.	Thank you for taking the time to go through our plan. We value your feedback. We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 Technical Report. In addition, we also published a non-technical summary that highlighted key features of our plan. 1. Figure 2.1 in our rdWRMP24 Technical Report provided a simple overview of the WRMP development process. It shows how our forecasts of future supply and demand determine the scale of the supply-demand balance deficit we need to plan for. Figure 5.2 in our rdWRMP24 Technical Report showed the key components of our supply and demand forecasts and the development of future supply-demand balance scenarios in view of the uncertainties that are inherent in these forecasts. 2. The need to protect and enhance the environment is a key driver for our plan. It is leading to significant investments that are needed to ensure sustainable and uninterrupted supplies of water in all but the most extreme weather conditions. Water recycling schemes and reservoirs are large infrastructure schemes with significant lead times. We are trying to deliver them as quickly as we can but delays in some cases are beyond our direct control. As part of our Water Industry National Environment Programme (WINEP), we are investigating a number of our sources to ensure that the amount of water we are taking from rivers and aquifers is sustainable over the long-term. This includes reducing or completely terminating supplies from sources where necessary. 3. We have a very ambitious demand management programme that aims to exceed the targets set by the Government. We are aiming to reduce leakage by 53% by 2050 against the 50% reduction target set by the Government. Similarly, we aim to achieve a Per Capita Consumption (PCC) level of 110 litres per person per day by 2045, ahead of the 2050 date set by the Government. However, the scale of supply-demand balance we face, which is driven in large part by the need to reduce the amount of water we take from rivers and groundwater, requires us

Reference	Feedback	Southern Water response
	I urge you to consider the unacceptable and avoidable environmental impact these plans will have if not revised.	to additionally develop large infrastructure schemes such as water recycling plants and reservoirs. These schemes require a unique set of geological, geographical, hydrological and hydroecological conditions to be viable. The choice of locations for these types of schemes in therefore limited. We do however consider multiple options and, as part of our adaptive plan, are able to switch to alternative schemes in a number of cases. Our 2019 WRMP (WRMP19) included a large desalination plant on the West Southampton coast. As further investigation showed the scheme to have an unacceptably high environmental impact, we replaced that with the Hampshire Water Transfer and Water Recycling Project (HWTWRP) that we are now in the process of delivering by 2034. The WRMP is updated at least every 5 years and we review all options, including those that have previously not been considered feasible, to ensure that we have sufficient supplies for the future. The selection of the option to import water from Norway via sea tankers was part of our mitigation against delays to delivery of HWTWRP. This option is no longer included in our fdWRMP24. 4. As part of our 2018 agreement with the Environment Agency under section 20 of the Water Industry Act 1991, we remain committed to using all best endeavours to deliver a long-term solution in Hampshire as soon as possible. We are not planning to use the Lower Itchen drought option post 2030 and the Candover drought option post 2034. The River Test drought option will only be used in a drought of more than 1-in-200 year severity post 2034. We are not planning to use any drought permits and orders to increase supplies across our supply area beyond 2041. 5. In the absence of any specific examples of errors, we are unable to respond to this comment. 6. The Environment Agency, among other respondents, has provided us with detailed feedback, including on our environmental assessments. We are updating our environmental assessments in view the feedback. These will be included in our final plan. We have noted your comment but respectfully disagree. We have developed our plan with a view to ensuring that we are able to deliver uninterrupted supplies of good quality water to our customers well into the future in all but the most extreme weather conditions while protecting and enhancing environment.

Table 15: Feedback from sub-group 2b and our response.

Reference	Feedback	Southern Water response
WRMP81; WRMP83; WRMP85; WRMP86; WRMP87; WRMP88; WRMP89; WRMP90; WRMP91; WRMP92; WRMP93; WRMP94; WRMP95; WRMP96; WRMP97; WRMP98; WRMP100; WRMP102; WRMP103; WRMP104; WRMP105; WRMP106; WRMP110; WRMP113; WRMP114; WRMP115; WRMP116; WRMP117; WRMP118; WRMP121; WRMP122; WRMP125; WRMP127; WRMP129; WRMP130; WRMP133; WRMP137; WRMP139; WRMP141; WRMP142; WRMP143; WRMP145; WRMP146; WRMP149; WRMP150; WRMP152; WRMP153; WRMP154; WRMP155; WRMP156; WRMP158; WRMP159; WRMP160; WRMP162; WRMP163; WRMP164; WRMP165; WRMP166; WRMP167; WRMP168; WRMP169; WRMP170; WRMP171; WRMP172; WRMP173; WRMP174; WRMP175; WRMP176; WRMP177; WRMP178; WRMP180; WRMP182; WRMP183; WRMP185; WRMP186; WRMP187; WRMP189; WRMP190; WRMP191; WRMP192; WRMP193; WRMP194; WRMP195; WRMP196; WRMP197; WRMP198; WRMP199; WRMP200; WRMP202; WRMP203; WRMP204; WRMP205; WRMP206; WRMP207; WRMP208; WRMP209; WRMP210; WRMP211; WRMP212; WRMP215; WRMP216; WRMP217; WRMP218; WRMP219; WRMP220; WRMP221; WRMP222; WRMP224; WRMP225; WRMP226; WRMP227; WRMP228; WRMP229; WRMP230; WRMP231; WRMP232; WRMP233; WRMP234; WRMP235; WRMP236; WRMP237; WRMP238; WRMP239; WRMP240; WRMP241; WRMP242; WRMP245; WRMP247; WRMP248; WRMP249; WRMP250; WRMP251; WRMP252; WRMP253; WRMP254; WRMP255; WRMP256; WRMP257; WRMP258; WRMP260; WRMP261; WRMP262; WRMP263; WRMP264; WRMP265; WRMP266; WRMP270; WRMP272; WRMP274; WRMP275; WRMP276; WRMP277; WRMP278; WRMP279; WRMP281; WRMP282; WRMP283; WRMP284; WRMP286; WRMP287; WRMP288; WRMP289; WRMP290; WRMP291; WRMP292; WRMP293; WRMP294; WRMP295; WRMP296; WRMP297; WRMP299; WRMP301;	Dear Mr Gosden, I am responding to Southern Water Services' (SWS) consultation of its Water Resource Management Plan (WRMP). I have found the consultation documents opaque and it is my view that far greater transparency of information is required. It is difficult to understand SWS's reasoning for its long delays in finding alternative supplies of water to stop it abstracting from sensitive chalk streams and aquifers. In particular: 1. There is a lack of transparency in the consultation as the documents lack high-level figures to explain the way in which predictions on supply, demand and deficit are made. 2. There is a lack of real commitment to long-term projects needed to ensure environmental protection from abstraction. For instance, the Water Recycling schemes and the use of the Havant Thicket Reservoir need to be brought forward with tighter time-frames. Southern Water should not be relying on taking water from the rivers and the aquifer. 3. There are no long-term “Plan B’s” in case the recycling and reservoir options are delayed or abandoned. This means huge risk to important chalk streams and their wild fish populations. 5. The plan is not consistent with promises made by the water company to the Environment Agency in 2018 to use “all best endeavours” to bring forward long-term water resource schemes to avoid the use of damaging drought permits and orders. 6. The environmental assessments, which describe the impact of the water resource schemes, are full of errors. They do not properly consider the impacts of increased abstraction on the chalk streams and their aquifers. 7. The environmental assessments do not deal with the consequences of the Environment Agency’s conclusions that there is a salmon “metapopulation” of fish in the southern chalk streams. It is my view that the plan fails on all fronts: clarity, deliverability, environmental assessment and environmental protection.	Thank you for taking the time to go through our plan. We value your feedback. We provided detailed information on our rdWRMP24 through a technical report accompanied by 22 annexes. The WMRP, by its nature, is a highly technical plan. We need to demonstrate that our plan is legally and technically compliant with the regulatory framework and that makes the use of technical terms unavoidable. However, we do try to make the plan understandable to a broad audience and therefore included a detailed glossary at the start of our rdWRMP24 Technical Report. In addition, we also published a non-technical summary that highlighted key features of our plan. 1. Figure 2.1 in our rdWRMP24 Technical Report provided a simple overview of the WRMP development process. It shows how our forecasts of future supply and demand determine the scale of the supply-demand balance deficit we need to plan for. Figure 5.2 in our rdWRMP24 Technical Report showed the key components of our supply and demand forecasts and the development of future supply-demand balance scenarios in view of the uncertainties that are inherent in these forecasts. 2. The need to protect and enhance the environment is a key driver for our plan. It is leading to significant investments that are needed to ensure sustainable and uninterrupted supplies of water in all but the most extreme weather conditions. Water recycling schemes and reservoirs are large infrastructure schemes with significant lead times. We are trying to deliver them as quickly as we can but delays in some cases are beyond our direct control. As part of our Water Industry National Environment Programme (WINEP), we are investigating a number of our sources to ensure that the amount of water we are taking from rivers and aquifers is sustainable over the long-term. This includes reducing or completely terminating supplies from sources where necessary. 3. We have a very ambitious demand management programme that aims to exceed the targets set by the Government. We are aiming to reduce leakage by 53% by 2050 against the 50% reduction target set by the Government. Similarly, we aim to achieve a Per Capita Consumption (PCC) level of 110 litres per person per day by 2045, ahead of the 2050 date set by the Government. However, the scale of supply-demand balance we face, which is driven in large part by the need to reduce the amount of water we take from rivers and groundwater, requires us

Reference	Feedback	Southern Water response
WRMP302; WRMP305; WRMP306; WRMP308; WRMP309; WRMP310; WRMP312; WRMP313; WRMP314; WRMP316; WRMP317; WRMP318; WRMP320; WRMP321; WRMP322; WRMP323; WRMP324; WRMP325; WRMP326; WRMP327; WRMP329; WRMP330; WRMP331; WRMP332; WRMP333; WRMP334; WRMP335; WRMP337; WRMP338; WRMP339; WRMP340; WRMP341; WRMP342; WRMP343; WRMP344; WRMP345; WRMP346; WRMP347; WRMP348; WRMP349; WRMP350; WRMP352; WRMP353; WRMP355; WRMP357; WRMP358; WRMP359; WRMP361; WRMP362; WRMP363; WRMP365; WRMP366; WRMP367; WRMP369; WRMP370; WRMP373; WRMP374; WRMP375; WRMP376; WRMP377; WRMP378; WRMP379; WRMP380; WRMP381; WRMP382; WRMP383; WRMP385; WRMP386; WRMP387; WRMP388; WRMP389; WRMP390; WRMP391; WRMP392; WRMP394; WRMP395; WRMP397; WRMP398; WRMP399; WRMP400; WRMP402; WRMP403; WRMP404; WRMP406; WRMP407; WRMP408; WRMP409; WRMP411; WRMP413; WRMP414; WRMP416; WRMP418; WRMP419; WRMP420; WRMP424; WRMP425; WRMP426; WRMP427; WRMP428; WRMP429; WRMP430; WRMP431; WRMP432; WRMP433; WRMP434; WRMP435; WRMP436; WRMP437; WRMP438; WRMP439; WRMP440; WRMP441; WRMP442; WRMP443; WRMP444; WRMP445; WRMP446; WRMP447; WRMP448; WRMP449; WRMP450; WRMP451; WRMP452; WRMP455; WRMP456; WRMP458; WRMP459; WRMP460; WRMP461; WRMP1051; WRMP1053; WRMP1055; WRMP1057; WRMP1058; WRMP1059; WRMP1060; WRMP1061; WRMP1062; WRMP1063; WRMP1067; WRMP1069; WRMP1070; WRMP1071; WRMP1073; WRMP1077	I urge you to consider the unacceptable and avoidable environmental impact these plans will have if not revised.	to additionally develop large infrastructure schemes such as water recycling plants and reservoirs. These schemes require a unique set of geological, geographical, hydrological and hydroecological conditions to be viable. The choice of locations for these types of schemes in therefore limited. We do however consider multiple options and, as part of our adaptive plan, are able to switch to alternative schemes in a number of cases. Our 2019 WRMP (WRMP19) included a large desalination plant on the West Southampton coast. As further investigation showed the scheme to have an unacceptably high environmental impact, we replaced that with the Hampshire Water Transfer and Water Recycling Project (HWTWRP) that we are now in the process of delivering by 2034. The WRMP is updated at least every 5 years and we review all options, including those that have previously not been considered feasible, to ensure that we have sufficient supplies for the future. The selection of the option to import water from Norway via sea tankers was part of our mitigation against delays to delivery of HWTWRP. This option is no longer included in our fdWRMP24. 5. As part of our 2018 agreement with the Environment Agency under section 20 of the Water Industry Act 1991, we remain committed to using all best endeavours to deliver a long-term solution in Hampshire as soon as possible. We are not planning to use the Lower Itchen drought option post 2030 and the Candover drought option post 2034. The River Test drought option will only be used in a drought of more than 1-in-200 year severity post 2034. We are not planning to use any drought permits and orders to increase supplies across our supply area beyond 2041. 6. In the absence of any specific examples of errors, we are unable to respond to this comment. 7. The Environment Agency, among other respondents, has provided us with detailed feedback, including on our environmental assessments. We are updating our environmental assessments in view the feedback. These will be included in our final plan. We have noted your comment but respectfully disagree. We have developed our plan with a view to ensuring that we are able to deliver uninterrupted supplies of good quality water to our customers well into the future in all but the most extreme weather conditions while protecting and enhancing environment.

Table 16: Feedback from group 3 and our response.

Reference	Feedback	Southern Water response
WRMP78	It is utterly unacceptable for you and share-holders to be taking dividends and to profit from the abuse of the waterways that you should be protecting.	Thank you for taking the time to go through our plan. We value your feedback. Our dividends are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest. Southern Water is not making a profit and has actually registered losses in the last two accounting years, as we invest more in our networks than we previously pledged to.
WRMP82	Your company's performance has been dire in the past. I hope sincerely that you and your colleagues will turn over a new leaf and respond promptly to the real and legitimate concerns of the public. You have been aware of the concerns for many years but appear to have thought it acceptable to delay and obfuscate. Your customers and the general public expect that to change forthwith.	Thank you for taking the time to go through our plan. We value your feedback. We acknowledge that our performance has at times fallen below expectations in recent years. We are trying hard to address that.
WRMP84	Please,please,please stop your plans for water abstraction of our beautiful chalk streams and their aquifers., do you really want to see dried up river beds where once flowed crystal clear water and all the wonderful river inhabitants no longer. Come on …please don't take away that beautiful habitat so that our grandchildren can enjoy the countryside as we have	Thank you for taking the time to go through our plan. We value your feedback. We share your views on preserving the natural environment for future generations. We are not planning to increase the volume of water we can take from rivers and groundwater under existing licences. At a number of our existing sources, the volume of water we can take will reduce over time.
WRMP101	As someone who has fished the rivers for years, in southern England, I am deeply distressed of more damage to that already done to our precious chalk streams.	Thank you for taking the time to go through our plan. We value your feedback. Sustaining and, where possible, enhancing the environment is one of the key objectives of our plan. This is described in detail in Annex 9 that accompanied our rdWRMP24 Technical Report. The Havant Thicket Reservoir and the HWTWRP are primarily being delivered to protect the chalk streams in Hampshire by eliminating the need to rely on them for water during droughts.
WRMP107	It seems to me that the shareholders have extracted money from the company rather than invest in the basic services that the company is supposed to provide. Please do something about it before it is too late!	Thank you for taking the time to go through our plan. We value your feedback. We note the observation but respectfully disagree. Our dividends are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest.
WRMP109	I lived on (and owned) a stretch of the river Itchen for over forty-five years and your management of the resource has been inept and tragic; in fact, an utter disgrace. How you can continue to abstract water in the volume you do beggars belief. Water quality is atrocious. You should be ashamed!	Thank you for taking the time to go through our plan. We value your feedback. The volume of water we take from the River Itchen is governed by the abstraction licence issued to us by the Environment Agency. The licence specifies the minimum flow level in the

Reference	Feedback	Southern Water response
		river below which no water can be taken from it. Water taken from the river is treated to the strict UK drinking water standards before being put into supply.
WRMP111	Generally greater thought considerations and care need to go into protecting our water ways all the fish and animals and humans that use them. After all we all have a responsibility, only have one planet, must respect the environment and nature live as one with it.	Thank you for taking the time to go through our plan. We value your feedback. We fully agree with the statement and our plan aims to deliver overall best value, not just for our customers but the environment as well.
WRMP119	Thank you for taking the time to read this through. I am involved with a restoration project on the Upper River Frome catchment, in Dorset. Wessex Water, not Southern of course. But I have seen the devastating impacts of over abstraction on our chalk streams (not to mention all of the agri-pollution issues), particularly in the Piddle upper catchment.	Thank you for taking the time to go through our plan. We value your feedback. The observation is noted. We are unable to comment on another water company's operations. Our plan aims to sustain, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP123	I have been a fisherman and pro. Waterkeeper all my working life. I have been fighting abstraction for the last 60 years and have seen everything getting worse and worse more so in the last 20 years .I understand many of your difficulties in providing clean water for humans but the wildlife in our, once, beautiful rivers need clean water too to support their flows and millions of natural species. So I beg you to come up with sensible and sustainable plans and not just look at costs and profits.	Thank you for taking the time to go through our plan. We value your feedback. As can be seen from Figure 10, Figure 11 and Figure 12 above, there has been no net increase in the amount of water we have taken from the rivers Test and Itchen over the last 20 years or so. Any worsening of the river conditions observed over the last 20 years cannot be directly attributed to increased abstraction from the rivers by Southern Water. Although we currently have the option of taking more water from these rivers during droughts, we have not had to exercise this option to date. We are making significant investments in developing long-term solutions such as the Havant Thicket Reservoir and the HWTWRP. Once these solutions are in place, we will not have to rely on taking water from these rivers during droughts.
WRMP124	I run a fly fishing business on the chalk streams and my business has been badly affected by abstraction and pollution over the past 30 years. Please stop the greenwash and make sure the flows in these unique streams are better protected.	Thank you for taking the time to go through our plan. We value your feedback. As can be seen from Figure 10, Figure 11 and Figure 12 above, there has been no net increase in the amount of water we have taken from the rivers Test and Itchen over the last 20 years or so. Any worsening of the river conditions observed over the last 20 years cannot be directly attributed to increased abstraction from the rivers by Southern Water. Although we currently have the option of taking more water from these rivers during droughts, we have not had to exercise this option to date. We are making significant investments in developing long-term solutions such as the Havant Thicket Reservoir and the HWTWRP. Once these solutions are in place, we will not have to rely on taking water from these rivers during droughts. Our plan aims to protect and, where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP126	I fish the river Avon at Ringwood and it has deteriorated badly over the last 30 odd years. Please consider more deeply what abstraction causes to fish life.	Thank you for taking the time to go through our plan. We value your feedback.

Reference	Feedback	Southern Water response
		We currently do not abstract water from the River Avon. Any observed deterioration on any stretch of the river can therefore not be attributed to our operations.
WRMP128	I recently had the benefit of raw sewage running down my road thanks to you, your board and your owners (shareholders) prioritising your compensation packages and shareholder (owner) dividends over providing a fit for purpose infrastructure. I am also a fisherman and have personally experienced the decline of our wild fish stocks as a result of the greed of people and companies like yours. It's about time you proved that you personally, your fellow board members and your shareholders/owners are fit for purpose.	Thank you for taking the time to go through our plan. We value your feedback. We apologies for the inconvenience caused by sewer flooding in your area. The measures we are undertaking to improve our wastewater performance are described in our Drainage and Wastewater Management Plans, published in 2022 (Our Drainage & Wastewater Management Plans (DWMPs)). As you can see from Figure 10, Figure 11 and Figure 12 above, there has been no net increase in the amount of water we take from the rivers in Hampshire over the last 20 years or so. Our plan aims to sustain, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP131	Please would you get back to me regarding my concerns when you have time? Many thanks.	Thank you for taking the time to go through our plan. We value your feedback. We hope our responses in **Error! Reference source not found.** to Table 15 address your feedback.
WRMP132	Nature depletion is real and happening now, please please review this proposal.	Thank you for taking the time to go through our plan. We value your feedback. Your comment is noted.
WRMP134	Get a grip Lawrence. When you look back as an old man, you may very well regret it if you don't.	Thank you for taking the time to go through our plan. We value your feedback. Your comment is noted but we respectfully disagree.
WRMP135	You can possibly understand why the public opinion is that the water companies have been run solely for the enrichment of the shareholders and top management. Unless there is a noticeable change of attitude, it is inevitable that there will be pressure for nationalisation. This is contrary to many people's natural inclination but needs must.	Thank you for taking the time to go through our plan. We value your feedback. We acknowledge that our performance in some areas has fallen below expectations in recent years. We apologise for that and are working hard to address it. Our dividends and executive pay are firmly linked to performance. We only pay dividends to our shareholders when we're performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest. Executive bonuses are also linked to the delivery of improvements in our customer satisfaction and environmental performance. These are paid by shareholders, not customers.
WRMP140	Do the right thing, invest properly for the future and put the correct infrastructure in. Stop taking short term solutions that irreversible damage the environment and nature that relies upon it - rivers are our lifeblood, stop treating them as a voiceless commodity to be exploited.	Thank you for taking the time to go through our plan. We value your feedback. There has been no net increase in the volume of water we have taken from the rivers Test and Itchen over the last 20 years or so (see Figure 10, Figure 11 and Figure 12). Although we currently have the option of taking more water from these rivers during droughts, we have not exercised this option to date. We are making significant investments in building the Havant

Reference	Feedback	Southern Water response
		Thicket Reservoir and the HWTWRP. These schemes will eliminate the need for us to rely on additional water from the rivers Test and Itchen in the event of a drought in future.
WRMP148	Although I no longer live in the South of England, I have friends who do, and holiday there. And, to be honest, even if I didn't I would strongly support the revision of these plans as I care deeply about nature, and British wildlife in all its forms. Please listen and act. Thank you.	Thank you for taking the time to go through our plan. We value your feedback. Our plan aims to sustain, and where possible, enhance the natural environment. This is described in detail in Annex 9 to our main rdWRMP24 Technical Report.
WRMP157	This green and pleasant land that has been nurtured over the centuries by careful management is facing a terrible change due to the short termism of companies such as yours who are only interested in lining your own pockets. Shame on you, sir.	Thank you for taking the time to go through our plan. We value your feedback. We are unable to comment on land management practices in your area. Our plan aims to sustain, and where possible, enhance the natural environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP179	It is no longer acceptable for Southern Water to have a devastating affect on our aquatic environment through over abstraction and pollution of valuable habitats, you have got away with it for far too long. You have failed to invest in infrastructure since privatisation, instead paying out bonuses and dividends to managers and shareholders.	Thank you for taking the time to go through our plan. We value your feedback. There has been no net increase in the volume of water we have taken from the rivers Test and Itchen over the last 20 years or so (see Figure 10, Figure 11 and Figure 12 above). Although we currently have the option of taking more water from these rivers during droughts, we have not exercised this option to date. We are making significant investments in building the Havant Thicket Reservoir and the HWTWRP. The schemes will eliminate the need for us to rely on water from the rivers Test and Itchen during droughts. Our dividends and executive pay are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest. Executive bonuses are also linked to the delivery of improvements in our customer satisfaction and environmental performance. These are paid by shareholders, not customers.
WRMP181	As a member of Friends of the River Ems I see daily the impact that transfers from the Ems catchment to support water supplies in the SW supply zone has on base flow in the River. Currently the local aquifer which supplies springs and therefore River flow is 20metres below the level at the same time last year. The River Ems is in crisis with flows too low to support good ecological potential with siltation throughout the River and its tributaries. This will imminently compromise the spawning of the remaining trout that have somehow survived the devastation. No where in your WRMP do you acknowledge the specific damage being done to the River Ems and certainly there is no short term proposal to save the River pending possible longer term water resource interventions. Therefore in my informed view your Plan fails at all environmental levels.	Thank you for taking the time to go through our plan. We value your feedback. We do not take water directly from the River Ems and are therefore unable to comment on any impacts of abstraction in the area on river flows and groundwater levels.
WRMP184	Thank you for consulting and affording us the opportunity to share our thoughts with you.	Thank you for taking the time to go through our plan. We value your feedback.

Reference	Feedback	Southern Water response
WRMP188	Although the format of this letter is the one provided by WildFish I have been aware of much of the background information from my own reading.	Thank you for taking the time to go through our plan. We value your feedback. We recognise that your feedback is part of a group action. However, this does not lessen its value.
WRMP201	Can we not all pull together as members of the public and employees of Southern Water to urgently address the problems and save our environment. It is enough to hear of the wars and destruction happening all over the world it seems. We are being warned about raised temperatures in summer 2025 and potential drought. Please raise the game and ACT now. It is a national shame that we are in this situation.	Thank you for taking the time to go through our plan. We value your feedback. Public consultation on our plan and other engagement activities we carry out while developing the plan are designed to get feedback from our customers and stakeholders in order to inform our plan. The impact of climate change is one of the key factors we have considered in assessing the future need for water. This was covered in Section 5.5 of our rdWRMP24 Technical Report.
WRMP213	You are dealing with such a precious and irreplaceable habitat and landscape I would ask you to change your emphasis and priorities, put it first and find better ways to achieve your goals	Thank you for taking the time to go through our plan. We value your feedback. As we stated in our plan, our strategy is based on four key objectives: • Efficient use of water and minimal wastage across society • New water sources that provide resilient and sustainable supplies • A network that can move water around the region • Catchment and nature-based solutions that improve the environment we rely upon. We have noted your comment but are unclear on the objective(s) you disagree with and any additional areas that you believe we should be focussing on.
WRMP214	Is there any point in visiting areas of water controlled by Southern Water, even if of outstanding beauty, to be met by smelly, contaminated effluent and fishing is not the worthwhile pastime it should be. Licence investment is like backing a loser. I weep for my grandchildren not being able to see what I have seen and done in my formative years.	Thank you for taking the time to go through our plan. We value your feedback. We note your comment about effluent discharges in your area. The measures we are undertaking to improve our wastewater performance are described in our Drainage and Wastewater Management Plans, published in 2022 (Our Drainage & Wastewater Management Plans (DWMPs)).
WRMP223	From a personal perspective I have fished the River Test for more than 40 years and have witnessed a steady decline in water clarity, insect life and biodiversity, a decline that has accelerated over the last few years. This environmental degradation has had disastrous consequences, not only for fish and other aquatic populations but also non aquatic wild life, most obviously for insect eating birds such as swallows. Large flocks of swallows feeding over the river used to be a common sight but sadly no longer. There have also been serious consequences for the local economy and businesses which are dependent on revenue from tourism and fishermen in particular, many of whom used to come to the Test valley from all over the world. The destruction of this unique habitat is almost entirely attributable to the negligence of Southern Water, a terrible legacy for your company. I urge you to take urgent remedial action before it is too late.	Thank you for taking the time to go through our plan. We value your feedback. As shown in Figure 10, Figure 11 and Figure 12, there has been no net increase in the volume of water we have taken from rivers Test and Itchen over the last 20 years. Any degradation that you may have noticed in aquatic and non-aquatic wildlife or on the local economy cannot be attributed to Southern Water abstractions alone. Our plan aims to sustain, and where possible, enhance the natural environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.

Reference	Feedback	Southern Water response
WRMP243	As ever SWS is driven by a profit only approach with no consideration for the devastating impact caused to the environment. When will you accept responsibility and take the necessary steps to protect this precious resource?	Thank you for taking the time to go through our plan. We value your feedback. We respectfully disagree with the feedback. Sustaining and, where possible, enhancing the environment is a key driver for the investment we are proposing in our plan. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP244	As a passionate trout fisherman I have seen firsthand the damage that the mismanagement of waste water has done to our rivers. It is inexcusable to try to manage consumer habits whilst your company continually dumps waste into our streams and river systems. Your business is charged with the responsibility to deliver wholesome water to homes and businesses, our rivers and fish deserve the same.	Thank you for taking the time to go through our plan. We value your feedback. We apologise for any pollution incidents that you may have witnessed as a result of wastewater discharges. Such incidents occur during periods of heavy rainfall and the discharges are necessary in order to protect our customers' homes and businesses from sewer flooding. The measures we are undertaking to improve our wastewater services are described in our Drainage and Wastewater Management Plans (DWMPs) published in 2022 (Our Drainage & Wastewater Management Plans (DWMPs)).
WRMP246	I write this as one who was privileged to grow up near the banks of and fish the chalk streams around Salisbury in the 1960s and now witnesses the progressive destruction of this unique habitat as a result of your companies actions. You should hold your head in shame.	Thank you for taking the time to go through our plan. We value your feedback. We note your comment but respectfully disagree with it. Any decline in natural habitats that you may have witnessed in the chalk streams in Hampshire cannot be solely attributed to Southern Water abstractions. As shown in Figure 10, Figure 11 and Figure 12, there has been no net increase in the volume of water we have taken from the rivers Test and Itchen since 2003. Out plan aims to sustain, and where possible, enhance the natural environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP259	The UK consists of so many waterways, rivers, streams, canals and all are essential to my wellbeing, to access and enjoy. We are made up of rivers and all should be well maintained, clean and essentially healthy.	Thank you for taking the time to go through our plan. We value your feedback. We fully agree with the sentiments expressed in your feedback.
WRMP267	Global environments are increasingly under threat, and our only hope is to work as a collective to save all environments, large and small. This is your opportunity to show integrity and empathy for the environment and the people your company should serve. Do not take the easy route. Short-sightedness and short-termism is bringing about the end of the world and will continue to do so unless people in positions as powerful as yours join us and commit to care and empathy over profits.	Thank you for taking the time to go through our plan. We value your feedback. We agree that everyone has a part of play in protecting and sustaining the natural environment. Public consultation on our plan and other engagement activities we carry out while developing the plan are designed to get feedback from our customers and stakeholders in order to inform our plan. We are happy to work with our customers, regulators and other stakeholders in not only developing our plans but delivering them as well.
WRMP268	Water companies have been guilty of asset stripping and under funding water resources while lining their own pockets with excessive profits and bonuses. It is time this all stopped and the proper levels of investment into research and development should be encouraged to preserve these valuable resources for future generations.	Thank you for taking the time to go through our plan. We value your feedback. As part of our plan, we are investing heavily in large projects like the Havant Thicket Reservoir and the HWTWRP to eliminate our reliance on water from the rivers Test and Itchen during droughts.

Reference	Feedback	Southern Water response
		Our plan aims to protect, and where possible, enhance the natural environment. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP269	You have to think about the whole picture. Each action you take will have knock-on effects on the environment, some parts of which are already delicately poised. Please think carefully and holistically about your plans for the sake of all of us.	Thank you for taking the time to go through our plan. We value your feedback. Protecting and, where possible, enhancing the environment is a key part of our plan. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP271	I live in the north west, so what damage you inflict on the waters you control will not personally affect me - but I care deeply about the environment everywhere, and the precious non-human creatures who desperately need clean water. Please just look at the fish on the right. Is this acceptable to you?	Thank you for taking the time to go through our plan. We value your feedback. Any picture of a fish that accompanied your feedback did not come through to us. We respectfully disagree with the suggestion that our abstractions are the sole reason behind any decline in fish populations in the rivers we abstract from. As shown in Figure 10, Figure 11 and Figure 12, there has been no net increase in the amount of water we have taken from rivers Test and Itchen over the last 20 years or so. Protecting and, where possible, enhancing the environment is a key part of our plan. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP273	I have fished the rivers Itchen and the Meon for over 40 years and, over that period, witnessed the continual, unarguable and sad decline in both water quality and water flow. Your current plans provide no confidence that this trend will be slowed down, let alone reversed, and I implore you to replace them with plans which limit abstraction, and its detrimental environmental impact, from chalk streams and their aquifers.	Thank you for taking the time to go through our plan. We value your feedback. As shown in Figure 10, Figure 11 and Figure 12 above, there has been no net increase in the volume of water we have taken from the rivers Test and Itchen since 2003. We currently have the option of taking more water from the River Itchen in the event of a drought, but we have not exercised that option to date. The delivery of the Havant Thicket Reservoir and the HWTWRP will eliminate the need for us to take water from the river during droughts. Our plan aims to protect, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP280	Put the environment first put the people first ! Profit is essential in any industry for it to flourish which in turn benefits everyone but to achieve profits on the scale you want you propose to damage yours and mine environment to the point of no return!	Thank you for taking the time to go through our plan. We value your feedback. Our plan aims to protect, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP285	As someone whose family has dedicated over a century to safeguarding the River Test—as river keepers—my family has witnessed firsthand the impacts of water abstraction. Not least In the 1990s, my grandfather Mick Lunn brought national attention to this issue when he spoke out against Southern Water's over-abstraction of the Test. Given your 30+ years of experience in the water industry, I urge you to do more to protect our precious chalk streams. It is my sincere hope that you will take decisive action to preserve these vital ecosystems for future generations and ensure that my children don't have to write a similar letter in the years to come.	Thank you for taking the time to go through our plan. We value your feedback. As shown in Figure 10, Figure 11 and Figure 12 above, there has been no net increase in the volume of water we have taken from the rivers Test and Itchen since 2003. Our plan aims to protect, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.

Reference	Feedback	Southern Water response
WRMP298	Furthermore as a riparian owner myself I am passionate about water course care and all the life it supports. As a prolific water company your painful devotion to profit and shareholder greed makes me wonder how CEOs like you sleep at night. So finally do the right thing.	Thank you for taking the time to go through our plan. We value your feedback. We respectfully disagree with your views on our priorities as a water company. Our plan aims to protect, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail. Our dividends and executive pay are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest. Southern Water is not making a profit and has actually registered losses in the last two accounting years, as we invest more in our networks than we previously pledged to.
WRMP300	We need some real change to stop these devastating effects on our waters, our wildlife, our health and our environment.	Thank you for taking the time to go through our plan. We value your feedback. Our plan aims to protect, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP304	Southern Water needs to do a lot of work to make this country like them, they probably have one of the worst reputations in the world. It's time to step up and do some good for the environment.	Thank you for taking the time to go through our plan. We value your feedback. We note your comment. Protecting and, where possible, enhancing the environment is a key driver for our plan. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP307	Although I now live in northern Scotland, I grew up in East Sussex and am very aware of the harm to the beautiful and precious natural environment there that your company's actions have. Please change these actions and plans so that the natural environment is protected and enhanced, and is not further degraded as a result of what you do.	Thank you for taking the time to go through our plan. We value your feedback. Our plan aims to protect, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP311	Southern water has never had an adequate plan to increase water to supply housing already there, just read past water management plans. No housing development planned or currently being built has factored in the increased water supply required relying on Southern Water to maintain a supply which at times of stress cannot adequately do. The impact of this can only lead to lack of supply thus further abstractions causing degradation of the water ways and environment for fish, animals, invertebrates and other creatures relying on a healthy habitat.	Thank you for taking the time to go through our plan. We value your feedback. A key regulatory requirement for our plan is that it must not constrain future growth. Housing growth underpins our forecast of future water demand. We have considered multiple housing and population growth scenarios in developing our plan. This was described in detail in Section 5.2.1 of our rdWRMP24 Technical Report and in Annex 7 that accompanied the report.
WRMP315	I am sure that further failure to improve the situation will only increase the poor overall impression given by Southern Water to the public and the government.	Thank you for taking the time to go through our plan. We value your feedback. Your comment is noted.
WRMP319	As a keen freshwater angler and guide I urge you to act in the interests of anglers and the general public.	Thank you for taking the time to go through our plan. We value your feedback.

Reference	Feedback	Southern Water response
		Our plan aims to deliver overall best value to our customers and the environment. Protecting and, where possible, enhancing the environment is a key driver behind our plan. Annex 9 to the main rdWRMP24 Technical Report describes this in detail.
WRMP328	Take responsibility and do the right thing. Take in the bigger picture- you know the answer…	Thank you for taking the time to go through our plan. We value your feedback. Our plan is looking at building a resilient, sustainable supply system that can maintain uninterrupted supplies of good quality water well into the future in all but the most extreme weather conditions.
WRMP336	DEAR SIRPLEASE CONSIDER THE ENVIRONMENT AND HELP US TO PROTECT THE FISH AND THE HEALTH OF THE WATERS THAT YOU SUPERVISE	Thank you for taking the time to go through our plan. We value your feedback. Our plan aims to protect, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP351	Please consider your legacey and act for the good of our precious environnment that actually sustains ours and the next generation well being.	Thank you for taking the time to go through our plan. We value your feedback. Our plan aims to protect, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP356	You musst take action to save all the river species which you and others have taken no action to preserve of promote for our future generations.	Thank you for taking the time to go through our plan. We value your feedback. We note your comment but respectfully disagree. Our abstraction licences on the rivers Test and Itchen were modified in 2018 in order to better protect the chalk streams in Hampshire.
WRMP360	I agree with Wildfish' assessment of the WRMP. I have long been a stakeholder for SW and have seen over many years the failure to really get a grip on the supply issue. Also, SW and all the Water Companies should be lobbying government fiercely to make adequate water supply and waste water disposal a planning constraint to reduce demand pressure.	Thank you for taking the time to go through our plan. We value your feedback. We have a duty to supply water in our area of operation. One of the regulatory requirements for our plan is that it must not constrain housing growth. We are not a statutory consultee on planning applications and can only offer advice.
WRMP364	Please please give your support to this effort by Wildfish, it is absolutely shameful that a small charity has to make such requests, our country's entire natural habitat is being threatened by the behaviour of the water companies that have so poorly managed both our money and environment for their own profit. Thank you.	Thank you for taking the time to go through our plan. We value your feedback. We note your comment but respectfully disagree. Southern Water is not making a profit and has actually registered losses in the last two accounting years, as we invest more in our networks than we previously pledged to.
WRMP368	Whilst I live in Teddington outside your companies area I regularly fish in the area your company manages. Therefore this issue is relevant to me and many others across the country.	Thank you for taking the time to go through our plan. We value your feedback. Your comment is noted.
WRMP371	Personally see the impact of this on the River Frome which runs through my land. It runs nearly dry in the summer yet is so polluted that the stream bed is covered in algae and when it floods in the winter my fields are poisoned and I cannot graze them because the algae	Thank you for taking the time to go through our plan. We value your feedback. We note your feedback but are unable to comment further as we do not abstract from the River Frome.

Reference	Feedback	Southern Water response
	grows even in winter and leaves a poisonous layer over dead loosened grass. You should be ashamed of your company and its impact on my life. Your cost saving is my loss of revenue.	
WRMP393	Although I live in Thames Water's area, I am often in Southern Water's area as I lopve the rural environment there.	Thank you for taking the time to go through our plan. We value your feedback. We are committed to preserving the environment in our supply area. Our plan aims to protect, and where possible, enhance the environment across our supply area. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP396	Living on the upper reaches of the River Test for over 3 decades now, I am very passionate about and active in the preservation of our rare chalk streams, and the aquifers that feed them. Please work with me and people like me to find environmentally equitable solutions to our plight.	Thank you for taking the time to go through our plan. We value your feedback. We are committed to protecting the iconic chalk streams in our supply area, including the River Test. We are happy to work with all stakeholders at the local level to preserve the environment for future generations.
WRMP401	I have seen first hand the marked detriment caused to our rivers as a direct result of illegal sewage flows, and combining this with over abstraction will spell further disaster for our rivers and surviving wildlife and fauna. I watch with interest.	Thank you for taking the time to go through our plan. We value your feedback. As shown in Figure 10, Figure 11 and Figure 12 above, there has been no net increase in the volume of water we have taken from the rivers Test and Itchen since 2003.
WRMP405	We are one of the worst countries in the world for our loss of biodiversity, our rivers are in a terrible state and we must act now to reserve the damage we have done. Please act correctly with everything we know, we are custodians of this planet and we must do everything we can for future generations.	Thank you for taking the time to go through our plan. We value your feedback. Protecting, and where possible, enhancing the environment is a key driver for our plan. This is discussed in detail in Annex 9 to our main rdWRMP24 Technical Report.
WRMP410	I am particularly concerned about Southern Water's plans for Havant Rhicket Reservoir nearby. Southern Water are proposing to hijack Portsmouth Water's Havant Thicket Reservoir (HTR – currently under construction) for use as an environmental buffer lake. A volume of 12 Olympic size swimming pools (30Ml/day) of recycled effluent will be pumped to the reservoir everyday, with an equivalent volume of mixed water from the reservoir then being moved via a new 40+km pipeline from Havant to [redacted] Water Supply Works near Winchester, for final treatment into the Southern Water supply network.	Thank you for taking the time to go through our plan. We value your feedback. The Havant Thicket Reservoir was always meant to be a joint venture between Portsmouth Water and Southern Water. Any notion of Southern Water hijacking a Portsmouth Water scheme is therefore misplaced. Together with the HWTWRP, the main aim of the reservoir is to eliminate the need for Southern Water to abstract water from the rivers Test and Itchen during droughts.
WRMP415	As a fisherman of over 40 years standing having to watch the damage your company and others cause is heartbreaking. Instead of hiding behind deliberately opaque and meaningless statements-do something to restore the waters.	Thank you for taking the time to go through our plan. We value your feedback. We note your comment and respectfully disagree. We are investing a significant sum of money over the next 10 years to protect the iconic chalk streams in our supply area.
WRMP421	The combined effects of over abstraction and pollution caused by sewage discharges (legal & illegal) are disastrous for the fragile aquatic ecosystems. With over abstraction magnifying the effect of pollution much greater effort is required to address these issues.	Thank you for taking the time to go through our plan. We value your feedback. As shown in Figure 10, Figure 11 and Figure 12 above, there has been no net increase in the volume of water we have taken from the rivers Test and Itchen since 2003. We apologies unreservedly for any issues you may have faced due to wastewater discharges. The measures we are undertaking to improve our wastewater services are described in our

Reference	Feedback	Southern Water response
		Drainage and Wastewater Management Plans (DWMPs) published in 2022 (Our Drainage & Wastewater Management Plans (DWMPs)).
WRMP422	Urgent action is needed to restore our rivers before it is too late. We need you to act to prevent further pollution and restore our famous chalk streams. There is no time to be lost. Please act now and save our chalk streams and the fish and water voles and otters. We cannot afford to lose any more wildlife.	Thank you for taking the time to go through our plan. We value your feedback. We fully agree with the need to protect the chalk streams in our supply are and are making significant investments over the next 10 years to ensure that we do not take any water from the rivers Test and Itchen during dry periods when river flows fall below the thresholds defined by the Environment Agency.
WRMP453	Additionally there is no acknowledgement or any suggested remedies regarding current and future impact on rivers locally situtaed to the Havant Thicket Reservoir which are already heavily impacted by over-abstraction . Ensuring that the Havant Thicket Reservoir also is able to alleviate these local over abstraction pressures and impacts is essential as well as providing water to Southern water in Hamsphire.	Thank you for taking the time to go through our plan. We value your feedback. As shown in Figure 10, Figure 11 and Figure 12 above, there has been no net increase in the volume of water we have taken from the rivers Test and Itchen since 2003. The Havant Thicket Reservoir, along with HWTWRP, will eliminate the need for us to rely on water from the rivers Test and Itchen during droughts.
WRMP454	I think your behaviour is disgusting for a supposedly responsible person. How can you sleep at night when you are directing your people to act so irresponsibly? Maybe Power corrupts. How can you let this happen to world famous, beautiful rivers in the south of England, without planning to stop it before it's too late. Shortly our grandchildren will no longer be able to walk by these rivers, let alone fish them. How will it feel to have been responsible for such a dreadful action. No doubt when this happens, those responsible will be held to account, just like any common criminal. Fines would be too simple, long confinement would be just, for such a deliberate crime against nature, for the sake of money.	Thank you for taking the time to go through our plan. We value your feedback. We respectfully disagree strongly with the sentiments expressed in your feedback.
WRMP464	I have noticed that your lack of precision is either due to a lack of knowledge of your field or a deliberate attempt at concealment of intent. I and others interested in democratic accountability for water resource management and its lifetime implications for future generations are awaiting a more sound and informed report.	Thank you for taking the time to go through our plan. We value your feedback. We have published our detailed plan and consulted on it so that all interested parties can review them and comment on them. It the absence of any specific examples of lack of precision or perceived concealment of intent, we are not able to comment any further.
WRMP466	Stop killing our rivers!	Thank you for taking the time to go through our plan. We value your feedback. We respectfully disagree strongly with your comment.
WRMP516	It is a sad reflection on our Water industry that with the constant pressure on the south of England the water companies have made no effort to upgrade the supply, but have irresponsibly polluted our waterways by constantly discharging effluent into our rivers, SHAME ON YOU.	Thank you for taking the time to go through our plan. We value your feedback. According to Ofwat, Investment in the industry roughly doubled since privatisation in 1989 up to 2022. total expenditure by the water sector during this period has been around £10 billion a year since privatisation in 1989. Between £5 billion and £6 billion of this amount has been spent on assets (Investment in the water industry - Ofwat). Water companies in England and Wales delivered £9.2bn of capital investment in 2023-24 (Water companies deliver record

Reference	Feedback	Southern Water response
		levels of investment, with even more needed in the coming decades | Water UK). So it is incorrect to suggest that water companies have made no effort to upgrade the supply. There have regrettably been instances where untreated sewerage has been discharged into rivers. In the majority of cases, this has happened when sewer systems have been overwhelmed following periods of high rainfall and untreated sewerage has had to be discharged in rivers in order to prevent homes and businesses from sewer flooding. The measures we are undertaking to improve our wastewater services are described in our Drainage and Wastewater Management Plans (DWMPs) published in 2022 (Our Drainage & Wastewater Management Plans (DWMPs)).
WRMP517	I have fished English rivers all my life and over the past few years I have seen a dramatic decline in river fly life with the inevitable knock-on effect up the food chain. Recent analysis on our river and others in Hampshire have shown not only elevated levels of nitrates, phosphates and e-coli, but also a dangerous cocktail of pharmaceutical products that can only be getting into the rivers via the Sewage Treatment plants - either by omission (i.e. inadequate screening) or by commission via untreated discharges. We area also experiencing more frequent and severe flash floods that damage the river banks causing a serious increase in particulate deposition, clogging critically important gravel beds. The increased winter rainfall should have been anticipated and additional water capture infrastructure put in place to enjoy the increase as a benefit rather than an environment-damaging consequence of climate change.	Thank you for taking the time to go through our plan. We value your feedback. We refer you to our Drainage and Wastewater Plans (DWSPs) published in 2022 to for the measures we are taking to improve our wastewater performance (Our Drainage & Wastewater Management Plans (DWMPs)). We are currently working on developing two large reservoirs. We are building the Havant Thicket Reservoir in Hampshire together with Portsmouth Water by 2031. Together with the HWTWRP, the reservoir will be able to provide up to 111Ml/d during periods of peak demand. We are collaborating with Affinity Water and Thames Water to build South East Strategic Reservoir Option (SESRO) in Oxfordshire by 2039. This will provide up to 120Ml/d in Hampshire. Our plan also includes building a reservoir on the River Adur in Sussex by 2045 to supply up to 19.5Ml/d
WRMP521	I have watched over the years the depletion of the aquifers and little to no investment being made to to store water and the results on the local chalk streams from over extraction which must stop before its too late.	Thank you for taking the time to go through our plan. We value your feedback. We are currently working with Portsmouth Water to build the Havant Thicket Reservoir in Hampshire by 2031.
WRMP525	Over the years I have fished many of the south of England chalkstreams - Kennet, Avon, Itchen, Test, Dun, Lambourn etc - and it would be tragic if these wonderful rivers, already under so much pressure, were to be despoiled by Southern Water's plans. Please consider the alternatives. One such, mooted for many years, is moving water from the water-rich North of England to the drier South. The Victorians would have done it - why can't we?	Thank you for taking the time to go through our plan. We value your feedback. As part of our plan, we are planning to eliminate the reliance on chalk streams, such as the Itchen and the Test during droughts. While the idea of a national grid has been discussed since the early 1970s, the energy costs associated with pumping water over large distances are prohibitively high and there are also concerns around the environmental impact of such a grid.
WRMP527	And finally, as a 'mature' angler I have seen a huge change to our local streams and rivers - sadly non of them positive. It's time to consider our responsibilities to look after our environment, to contain and stem the negative impact water companies are having on our treasured, natural resources! Week by week we watch (and monitor) the riverside environments and see them deteriorate. The wildlife, particularly the invertebrates are having a really tough time - the water pollution caused by water companies releasing untreated sewage is killing (and inhibiting) invertebrate populations. Populations that once nourished	Thank you for taking the time to go through our plan. We value your feedback. We refer you to our Drainage and Wastewater Plans (DWSPs) published in 2022 to for the measures we are taking to improve our wastewater performance (Our Drainage & Wastewater Management Plans (DWMPs)).

Reference	Feedback	Southern Water response
	wild fish species - These species are now under threat. So imaging this.... SWS, In essence YOU, now wish to continue/extend the extraction of large volumes of water without a considered (and appropriate) plan. As YOU choose to remove clean water from the river (essentially the dilutant) and in place pump in untreated sewage what do you think will be the net result. Maybe you need to ask our children what they think - I'm sure they will understand YOUR 'wildlife v wealth' equation and arrive at the appropriate answer. Please understand our concerns and make a positive contribution to the safeguard of our environment. Many thanks.	We are building the Havant Thicket Reservoir and the HWTWRP to eliminate reliance on water from the rivers Test and Itchen during droughts. The Havant Thicket Reservoir is planned for completion in 2031 and the HWTWRP in 2034. Our licences to abstract water from these rivers were modified in 2018 to significantly reduce the volume of water we can take from these rivers. As shown in Figure 10, Figure 11 and Figure 12, there has been no net increase in the volume of water we have taken from the rivers Test and Itchen since 2003.
WRMP552	It was a sad day when water companies were privatised. Now, the main priority is to pay good dividends to the shareholders, many of whom probably have no interest in maintaining the quality of our waterways. And of course large salaries and bonuses for directors who are mismanaging the companies.	Thank you for taking the time to go through our plan. We value your feedback. According to Ofwat, Investment in the industry roughly doubled since privatisation in 1989 up to 2022. total expenditure by the water sector during this period has been around £10 billion a year since privatisation in 1989. Between £5 billion and £6 billion of this amount has been spent on assets (Investment in the water industry - Ofwat). Water companies in England and Wales delivered £9.2bn of capital investment in 2023-24 (Water companies deliver record levels of investment, with even more needed in the coming decades | Water UK).
WRMP564	I am a retired water engineer, I worked in the industry for 37 years, so I'm concerned that SWS has not built any new impounding/storage reservoirs in recent years. Bearing in mind that the gestation period for new reservoirs is currently running at between 15 and 20 years then there is an immediate urgency for your team to secure long term supplies ... but without plundering the chalk aquifers and depleting river flows.	Thank you for taking the time to go through our plan. We value your feedback. We are currently working on developing two large reservoirs. We are building the Havant Thicket Reservoir in Hampshire together with Portsmouth Water by 2031. Together with the HWTWRP, the reservoir will be able to provide up to 111Ml/d during periods of peak demand. We are collaborating with Affinity Water and Thames Water to build South East Strategic Reservoir Option (SESRO) in Oxfordshire by 2039. This will be able to provide up to 120Ml/d in Hampshire. Our plan also includes building a reservoir on the River Adur in Sussex by 2045 to supply up to 19.5Ml/d.
WRMP579	Protection of the environment is down to all of us for the benefit of Sustainability and reduction of harm to health of all your present and future customers as well as all the wildlife that depends on a clean natural habitat.	Thank you for taking the time to go through our plan. We value your feedback. We agree that we all have a part to play in preserving the natural environment for future generations.
WRMP597	Please help keep the Wildfish safe and the People Healthy Thank You	Thank you for taking the time to go through our plan. We value your feedback. Our plan aims to deliver overall best value, both for our customers and the environment.
WRMP619	Please take some personal responsibility for the environment rather than solely striving for profit maximisation for your shareholders.	Thank you for taking the time to go through our plan. We value your feedback. Protecting and, where possible, enhancing the environment is a key driver for our plan. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP649	Our rivers are becoming polluted like they were when I was a child, I remember helping my mum gather suffocating trout to try to save them from the poisoned stream. We need to cherish our waterways now.	Thank you for taking the time to go through our plan. We value your feedback. As shown in Figure 10, Figure 11 and Figure 12 above, there has been no net increase in the volume of water we have taken from the rivers Test and Itchen since 2003.

Reference	Feedback	Southern Water response
WRMP679	As a resident of West Sussex I'm am aware that your company has failed over recent years to provide a reliable water supply to customers. You were saved this summer by unusually high rainfall, but last summer you struggled and put in restriction to residents using the resource, water, that we pay you to provide. However, it is no answer to abstract high levels of water from our rivers so that you ruin our water courses in providing what we pay for.	Thank you for taking the time to go through our plan. We value your feedback. The summer of 2022 ranked third highest in terms of average summer temperature since 1910 and had the nineth lowest average summer rainfall. This necessitated the use Temporary Use Bans (TUBs) for a period of time to ensure there was no interruption to supply. We are planning to build water recycling and desalination plants across our supply area to provide greater resilience during warm and dry periods.
WRMP681	Strive to do no harm; business with a conscience.	Thank you for taking the time to go through our plan. We value your feedback. We agree with the sentiment expressed in your comment.
WRMP702	You will realise that what has been outlined so far is a cut and paste but that should not take away from how important I view this issue. Please do consider this email seriously as I have lived on/worked and enjoyed fishing rivers for 45 years and the state of them is so troubling. Please make sure your team make the effort to take on board the constructive criticisms as we really need you to listen and get this right for EVERYONE. Thanks a lot,	Thank you for taking the time to go through our plan. We value your feedback. We recognise that your response is part of a group action. This, however, does not mean that we consider your response to be of any lesser value. The purpose of this consultation and the engagement activities we have undertaken during development of this plan is to invite views from our customers, regulators and other stakeholders so that we can take their views, including any criticism, on board.
WRMP704	Like many others, I am not prepared to stand by and watch our precious chalkstreams destroyed. You are in a position to be a (major) part of the problem, or an equally major part of the solution. Which is it to be? Please examine your conscience first, your shareholder profits second.	Thank you for taking the time to go through our plan. We value your feedback. We are committed to protecting and, where possible, enhancing the natural environment across our supply area. We are seeking to end our reliance on taking water from chalk streams in Hampshire during droughts by 2034.
WRMP713	As private investment has only served the investors and achieved so little the least you can now do is to repair the damage done and start looking after environment for the benefit of all, including humans, that depend on it. If that means that shareholders have to draw in their belts for a change, so be it.	Thank you for taking the time to go through our plan. We value your feedback. According to Ofwat, Investment in the industry roughly doubled since privatisation in 1989 up to 2022. total expenditure by the water sector during this period has been around £10 billion a year since privatisation in 1989. Between £5 billion and £6 billion of this amount has been spent on assets (Investment in the water industry - Ofwat). Water companies in England and Wales delivered £9.2bn of capital investment in 2023-24 (Water companies deliver record levels of investment, with even more needed in the coming decades | Water UK). Our dividends are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest.
WRMP731	I am a professional ecologist of 45 years and was until recently the convenor for the Freshwater Special Interest Group of the Chartered Institute of Ecology and Environmental Management (CIEEM). I am also a passionate freshwater angler and a member of game and coarse fishing syndicates on the River Test and I live within 50 metres of the river. I want to	Thank you for taking the time to go through our plan. We value your feedback. We share your views of preserving the environment for future generations and are endeavouring to do that as part of this plan.

Reference	Feedback	Southern Water response
	see the River Test and its biodiversity conserved for future generations to enjoy as much as I enjoy it today.	
WRMP787	I hope our grandchildren can enjoy the benefits that our rivers bring to enrich ending our lives. If every shareholder agreed to a 1% deduction from their dividends you could make a significant contribution to saving our rivers and our environment for future generations. Imagine the positive PR you could attract at a time when water companies are being hammered in the press and on social media. And maybe then you can make a difference. Please reconsider your plans. Thank you	Thank you for taking the time to go through our plan. We value your feedback. Our dividends and executive pay are firmly linked to performance. We only pay dividends to our shareholders when we are performing well and meeting the expectations of our customers. No external dividends have been paid to shareholders since 2017 and we do not expect any to be paid until after 2030 at the very earliest.
WRMP1054	Our unique chalkstream rivers are under immense pressure from invasive species, sewage pollution causing elevated nitrate and phosphate levels. Allowing abstraction will enhance the concentrating effects of Nitrogen and Phosphate upsetting the ecological balance of the river catchments.	Thank you for taking the time to go through our plan. We value your feedback. Our plan set out our commitment to protect the natural environment, and where possible, to enhance it. We are seeking to end our reliance on taking water from chalk streams in Hampshire during droughts by 2034. Our plan analysed independently by our regulators the EA, NE and Ofwat. Their analysis looks at all aspects of the plan, including the options and risks. The options and risks are also assessed independently by RAPID through the Gated Process, and by Defra through the WRMP process. The Environment Agency ensure compliance of all discharges and abstractions.
WRMP1056	There are clear technological solutions to manage water demands it just needs investment. There were plans to develop a desalination plant by Southern Water over ten years ago. This is an efficient way of producing drinking water with less environmental impact than abstraction.	Thank you for taking the time to go through our plan. We value your feedback. We note you support for desalination. We had recommended removal of the desalination option on the West Southampton coast to due to the potential environment impacts. We are planning to build water recycling and desalination plants across our supply area to provide greater resilience during warm and dry periods.
WRMP1064	My attention was brought to this matter by wildfish.org, hence my email.	Thank you for taking the time to go through our plan. We value your feedback. We note your comment on the rdWRMP.
WRMP1066	I have fished the Test, Itchen, Bourne and Wylye for forty-five years and am heart-broken at the continuous, ever-increasing and never-ending damage caused to these beautiful, precious and historic waterways during that time.	Thank you for taking the time to go through our plan. We value your feedback. We share your enthusiasm to preserve and protect the environment. We are endeavouring to do that as part of this plan. Annex 9 to our rdWRMP24 Technical Report describes what we are planning, in detail.
WRMP1068	I have loved tje chalk streams for many yesars and am mourning their destruction at your hands.**	Thank you for taking the time to go through our plan. We value your feedback. We are committed to protecting and, where possible, enhancing the natural environment and we are seeking to end our reliance on taking water from chalk streams in Hampshire during droughts by 2034. Annex 9 to our rdWRMP24 Technical Report describes what we are planning, in detail.

Reference	Feedback	Southern Water response
WRMP1074	As a utilities provider you are an absolute disgrace and have been for so many years. Southern Water would have disappeared long ago had people been able to make a choice of provider, you are in the fortunate position that customers are unable to choose, and you disappoint them repeatedly. Your lack of responsibility for the environment disgusts me and everyone I speak to.	Thank you for taking the time to go through our plan. We value your feedback. We share your views of preserving the environment and are endeavouring to do that as part of this plan. We are committed to protecting and, where possible, enhancing the natural environment across our supply area. We are making significant investments over the next 10 years to ensure that we do not take any water from the rivers Test and Itchen during dry periods when river flows fall below the thresholds defined by the Environment Agency. Annex 9 to our rdWRMP24 Technical Report describes this in detail.
WRMP1075	The chalk streams are unique - a world heritage.	Thank you for taking the time to go through our plan. We value your feedback. Protecting and enhancing the natural environment, where possible is what we seek to commit to in our plan. We endeavour to end our reliance on taking water from chalk streams in Hampshire during droughts by 2034.
WRMP1076	Both water companies and the government have seen the dire consequences of the failure to make long term commitments to protect our precious environment. The public can no longer be fooled by the short term sticking plaster policies that have left the UK as the most nature depleted country in Europe.	Thank you for taking the time to go through our plan. We value your feedback. We are committed to preserving, protecting and enhancing the natural environment, which is what we set out to do in this plan, You can find details of our commitments in Annex 9 to our rdWRMP24 Technical Report. Our capital programmes are delivered in line with our regulatory commitments and operational needs.