

# Drainage and Wastewater Management Plan (DWMP)

## Public Consultation Report

Summer 2022

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from  
**Southern  
Water** 

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# 1 Executive summary

The draft Drainage and Wastewater Management Plan (DWMP) explores the risks to customers and the environment from our drainage and wastewater systems, and identifies actions and investment needed to create resilient systems for the next 25 years.

We published our draft DWMP and our draft Strategic Environmental Assessment (SEA) for the DWMP on Monday the 13th June 2022 for a 12 week public consultation that closed at midnight on Monday 5th September 2022. This is the report on our public consultation for our draft DWMP. The consultation report for the draft DWMP's SEA is published separately at <https://www.southernwater.co.uk/dwmp/strategic-environmental-assessment>. We will publish the final version of our DWMP by 31 May 2023.

We received a total of 153 responses to our consultation. This document assesses and summarises the quantifiable responses we received via the on-line consultation of the draft DWMP from 127 of our customers and the partner organisations we worked with in developing the DWMP. A further 26 written responses from customers and stakeholders are not analysed in this report as they did not include the quantifiable responses that were in our on-line consultation. However, all responses to our consultation are equally important and are fully taken into account in our [Register of Stakeholder Comments](#) and used to inform the DWMP as it is finalised.

The aim of our consultation was to assess how important the issues in the Plan are to our customers and stakeholders, and how much support there is for the draft proposals. We also used the consultation to assess support for the Defra scenarios for addressing storm overflows.

## Key issues

We received responses from customers, community groups, local Councillors, and partner organisations. We analyse and present the findings on the responses within this report for these groups.

62% of all responders agreed or strongly agreed that the DWMP captures the main challenges for drainage and wastewater management across our operating area. They want to see a holistic approach taken to all the issues raised and equal weighting given to all the solutions proposed. Responders want to see more commitment to partnership working at both a strategic and local level and more alignment with, and emphasis on, local nature recovery strategies.

Most partner organisations:

- agreed that the challenges, aims and objectives had been clearly identified
- liked the acknowledgment of the range of risks and the investments that will be needed to address these
- were pleased that, for the first time, there is transparency of the scale of problems and environmental risks associated with the drainage and wastewater.

Local Councillors responded that

- the Plan is well written, mostly easy to understand and very comprehensive
- we have not done enough to publicise the consultation to our customers
- the DWMP should be far more radical in its approach.

Our customers have differing views on the draft DWMP:

- Just under half appreciate that it provides a systematic approach to considering major issues such as storm overflows, flooding and pollution
- Our focus should be preventing sewage releases into rivers and coastal waters
- Many think our DWMP should be much shorter and clearer
- Many are disillusioned with our performance over the last decade and see the DWMP as far too little and too late.
- Some think we should be re-nationalised as our focus is profits rather than caring for the environment.

Half of the community groups did not find much in the DWMP to support and felt that it was far too unambitious.

## Storm Overflow policies

We asked the question “Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated. Which policy scenario(s) would you most support?”

The most popular scenario for all responses is “to protect the environment from the impact of spills”, with 47% of responders choosing this option.

- 94% of all responders agreed or strongly agreed that rainwater should be separated from foul wherever possible to reduce flooding and overflow spills
- 70% of all responders agreed or strongly agreed that nature-based solutions should be prioritised over traditional engineering approaches to reduce the wastewater risks. Only 12% disagreed or strongly disagreed (18% had no opinion).

Many organisations are disappointed that we seem to be relying on traditional storage tanks to solve storm overflows and flooding rather than the more sustainable separation and nature-based solutions.

## Overall view of our draft DWMP

We asked if responders supported the approach set out in our first DWMP.

- 54% of all responders agreed or strongly agreed that they supported the approach set out by the DWMP.
- 50% of the Councillors agreed with the approach set out in the DWMP
- 50% of the community groups did not agree.

There is overwhelming support, though, from partner organisations. 75% agreed or strongly agreed that they supported the approach, but this contrasts to 46% the responses from customers who do not agree (disagreeing or strongly disagreeing).

## 2 Introduction

Ofwat, the water industry economic regulator, requires all water companies in England and Wales to publish and update Drainage and Wastewater Management Plans (DWMP) every five years. This is designed to improve the water sector's approach to long-term drainage and wastewater planning and to provide greater transparency, robustness, and clarity towards investment decisions. These plans are being developed using common national guidelines that set out the same planning objectives for each water company. The first DWMPs will be published on a non-statutory basis in the first half of 2023.

We developed the first draft of our DWMP for consultation by working with internal experts and collaborating with external organisations that have responsibilities for water, flooding, and drainage as well as for land use planning and environmental protection. Throughout the process, we listened to feedback and took on board as many views as possible. For example, we incorporated six additional planning objectives, over and above those set out in the national guidance, because these are considered vitally important for our stakeholders, our customers, and the environment. These additional planning objectives strongly influenced and shaped the development of our DWMP. We want to demonstrate our commitment to protecting and improving the environment while serving our customers with integrity.

We published our draft DWMP on Monday 13 June 2022 for a 12 week public consultation that closed at midnight on Monday 5 September 2022. The draft DWMP set out the main issues that affect the sewerage and drainage systems across our entire region, and how these impact on our customers, communities and the environment. It identified the types of actions and investments that are needed to manage the risks and improve and maintain robust and resilient drainage and wastewater systems over the next 25 years. We will publish the final version of our DWMP by 31 May 2023.

This document assesses and summarises the quantifiable responses we received via the on-line consultation of the draft DWMP from 127 of our customers and the partner organisations we worked with in developing the DWMP.

We received a further 26 written responses from customers and stakeholders which are not analysed in this report as they did not include the quantifiable responses that were incorporated in our on-line consultation. However, all responses to our consultation are equally important and are fully taken into account in developing our final DWMP.

The Annex to the report provides the on-line and written responses in full. Our ['Register of Stakeholder Comments'](#) sets out how we have considered and responded to material comments and views as we finalised the DWMP. This will be updated and published alongside our final DWMP in May 2023.

### 3. The DWMP website

Our website is the online platform for the DWMP. It is found at: <https://www.southernwater.co.uk/dwmp>. It serves two main purposes:

1. It is the repository of all DWMP materials and information:
  - a. At a regional level, the materials explain technical aspects of the DWMP such as:
    - Our draft DWMP and five supporting investment plans
    - A guide to the DWMP website and where to find things
    - The background to the programme
    - Who we've been working with which includes and our Register of Stakeholder comments
    - Our methodologies for assessing the risks to our infrastructure:
      - Risk Based Catchment Screening (RBCS),
      - Baseline Risk and Vulnerability Assessment (BRAVA)
      - Our Planning Objectives
    - Technical Summary reports, for example:
      - Factoring in climate change and growth
      - Our approaches to uncertainty, modelling, scenarios and adaptive planning
      - The selection of wastewater systems for the first cycle of the DWMP
      - How we undertook the Problem Characterisation (PC), the Options Development and Appraisal (ODA) and the Programme Appraisal (PA) processes
    - A DWMP glossary
    - Our 'Have your say' public response portal page.
  - b. At a river basin catchment level, there are subsections that present materials and information specific to each river basin. These include:
    - An overview of the river basin and its main characteristics
    - Risk Based Catchment Screening
    - Baseline Risk and Vulnerability Assessment results
    - For each wastewater system within a river basin:
      - Problem Characterisation of the system's issues and risks
      - Options Development and Appraisal to address system issues and risk
    - The overall Programme Appraisal for the river basin
    - The links to our 'Have your say' page.
2. The website is the online platform for our DWMP. It incorporates all the information developed as part of the DWMP so that it is accessible and transparently available to all. We updated the website as each stage of the DWMP was completed and it formed the basis for the 2022 public consultation.

## 4. The DWMP public consultation

### 4.1 The DWMP consultation process

The public consultation on the draft DWMP ran for a 12 week period from Monday 13 June to midnight on Monday 5 September 2022. Our website acted as the main mechanism to receive and log responses via the 'Have your say' page as well as through written submissions.

There were two parts to the consultation:

- a) The draft DWMP
- b) The draft Strategic Environmental Assessment (SEA)

The consultation on the draft DWMP asked our customers, communities, regulators, statutory and partner organisations about a range of aspects set out in the draft document and on the website. It was designed to assess how important the issues in the Plan are, and how much support there is for the draft proposals. We also used the consultation to find out which of the Defra scenarios for addressing storm overflows they supported based on the outline costs provided. The findings from the consultation have allowed us to adjust the DWMP according to customer's and partners' views and opinions.

The draft SEA appraises the proposed options to address wastewater risks identified by the DWMP against social, economic and environmental criteria and was used to inform our decision making. The consultation on the draft SEA asked statutory consultees to comment on the draft options presented. The consultation report on the SEA is published separately to this report at <https://www.southernwater.co.uk/dwmp/strategic-environmental-assessment>

### 4.2 Pre-consultation activities

#### 4.2.1 Working with stakeholders and partner organisations

We have been working with a wide range of partner organisations across the region and in each river basin catchment to develop the DWMP. These include:

- Statutory bodies - such as County Councils and Unitary and Local Planning Authorities
- Regulators - the Environment Agency, Natural England, Consumer Council for Water and Ofwat
- Neighbouring water companies
- Catchment Partnerships.

Several hundred representatives have participated in a range of workshops and webinars with us throughout the process of developing the DWMP.

We commenced the active engagement of others in our DWMP programme in Spring 2020. Since then, we have held:

#### **Three workshops in each River Basin Catchment (RBC) – a total of 33 workshops:**

- The first set of workshops, September 2020, explored the RBCS (Risk Based Catchment Screening) and considered POs (Planning Objectives). It resulted in incorporating an additional six partner organisation proposed POs into our DWMP, over and above the

six mandatory Water UK and our two bespoke POs, ensuring environmental and social issues were considered.

- The second set of workshops, April and May 2021, explained the Problem Characterisation and the Options Development and Appraisal stages of the DWMP.
- The third set of workshops, March 2022, discussed the investment needs across all the systems in the River Basin and agreed, in principle, that these seemed appropriate.

**Four sets (x2) of webinars** providing opportunities to answer questions in an open forum:

- August/September 2020 – webinar to explain the DWMP process and background
- December 2020 – webinar to update and explain the findings of the BRAVA (Baseline Risk and Vulnerability Assessment) for the six national POs as explained on our webpage on our [Planning Objectives](#)
- March 2021 – webinar to disseminate the findings of the BRAVA for the additional two Southern Water ‘bespoke’ POs to identify Annualised Flood Risk and Dry Weather Flow risks to our systems, and the six partner organisation proposed POs, again as set out on the Planning Objectives page.
- December 2021 – webinar to discuss how we are funded to generate a wider understanding of where funding comes from and what it needs to be used for providing a context for our draft DWMP investment programme.

In addition, in January 2022, we hosted a webinar by the Environment Agency. This was designed to help potential collaborators understand the Agency’s flood and coastal risk management funding schemes and the process of applying for its partnership funding.

**We held a further 41 meetings covering 61 of the wastewater catchments** during the ODA (Options Development and Appraisal) stage. These meetings brought together internal experts and external partners to discuss the key issues for specific wastewater systems in depth and identify potential options to address these. This number of meetings per County breaks down as:

- Kent: 16 meetings covering 21 wastewater systems
- Sussex: 14 meetings covering 20 systems
- Hampshire and the Isle of Wight: 11 meetings covering 20 systems

The outcomes of these meetings informed and shaped our draft investment plans for each system covered during the Options Development and Appraisal stage of the DWMP and are published for the relevant system and river basin catchment.

#### 4.2.2 The preliminary consultation

In October 2021, we held a preliminary consultation, to help shape our initial draft DWMP before engaging with the wider public. At this early stage we only consulted with the partner organisations we are working with to develop the DWMP. We wanted to:

- a) Consult on our Strategic Environmental Assessment (SEA) Scoping Report which set out how we intended to appraise the benefits of the proposed options and the potential impact on the environment; and
- b) Seek agreement on our proposed selection of wastewater systems to take through the Options Development and Appraisal (ODA) stage of the DWMP. The cycle 1 timetable meant we would not be able to complete a level 3 DWMP for all 381 of our wastewater systems

The preliminary consultation helped us to understand what our partners thought of the way we were organising the programme, the stages we had followed, whether we had captured the right issues, how we worked with them and check if and where there were areas that need improving.

We published the findings of the preliminary interim consultation which ran between 21 September 2021 and 26 October in January 2022. The report summarising stakeholders' and partners' views is available on our website at: <https://www.southernwater.co.uk/dwmp/have-your-say>

#### 4.2.3 Engaging customers and the customer insight programme

Keeping our customers informed of our developing DWMP is important to us. We shared all our work on the DWMP on our website as we developed the plan.

We have a range of customer insight panels which are asked to consider a range of issues in 'waves' of insight gathering. The panels are:

- Water Futures 2030 (household customers)
- Water Futures 2050 (future customers)
- Water Futures and vulnerability (vulnerable customers)
- Water Futures Business (non-household audiences)
- Water Futures and diverse cultures (customers from harder to reach audiences and diverse cultures)

Our approach to engaging customers was initially guided by insight undertaken with customer focus groups for PR19 which told us that our customers:

- Think it is sufficient to know that there will be a DWMP but think the detail is best left to Southern Water and relevant agencies.
- Find it reassuring that multiple organisations are talking to each other to ensure there is a cohesive strategy to manage wastewater and limit environmental damage.
- Are pleased to have a wider picture of the issues for the whole of the SE of England.
- Welcome the consideration of macro factors like urban creep, peoples' behaviours and climate change when planning for wastewater management.

Since 2021, the DWMP has been introduced to the panels and this told us that our customers think that the DWMP:

- Feels like a considered, comprehensive and robust plan that has been produced to tackle some massive challenges over the long term and provides a real sense of the scale of the challenges
- Is forward looking, comprehensive and, with the 25-year view reviewed every 5 years, has capacity to evolve over time
- Takes the challenges of drainage and wastewater seriously and recognises the extent of the challenges with planning that goes into the very long term.
- Has some unanswered questions around funding implications and how specifically it will all be delivered, but they are pleased that it plans to tackle the issue of CSOs at source.
- Has welcome and reassuring references to keeping costs down for customers showing that we have considered and have empathy with the economic environment they are coping with
- Sets out our commitment to supporting tourism and economic growth in the region

- Are reassured to know ABOUT the DWMP, but the granular detail provides too much information for customers to engage with as it doesn't always feel particularly customer facing, is jargon and word heavy and lacks explanation, for example, on the BRAVA results by catchment area

## 4.3 Promoting the public consultation

To promote responses to the consultation, we:

- Issued a press release on 9 August 2022 publicising the public consultation: <https://www.southernwater.co.uk/the-news-room/the-media-centre/2022/august/customer-opportunity-to-advise-future-of-wastewater-management>. This was designed to encourage our customers to engage with our consultation. This was published in both local and trade media.
- Engaged with Twitter (3,379 followers) and LinkedIn social media users through Southern Water channels throughout August 2022
- Notified all our partner organisation representatives and individuals (280+) two weeks in advance of the opening date of the consultation
- Circulated an email to all partner organisations on the go-live date asking them to complete the online questionnaire via the link to the 'Have your say' webpage
- Followed this up with two further reminders during the period the consultation was open for responses.
- Presented information regarding the DWMP and the consultation at a number of County Council and Local Authority Committee meetings between June and August 2022
- Provided staff updates via internal communications channels throughout the consultation period.

In addition, we sent the DWMP to Natural England, Historic England and the Environment Agency as statutory consultees for the Strategic Environmental Assessment.

## 4.4 Overview of responses

During the public consultation, visits to the website peaked at 45 views in the week of 22 August with several smaller peaks of around 30 visits in early July, just after the consultation opened, and just before it closed in early September. Overall, there were 944 visits to the consultation landing page and 684 unique page views.

A total of 153 responses were received. The table below sets out the numbers and totals of responses received. These are grouped into four segments: customers, community groups, councillors and partners organisations, and show whether the responses were on line or via written letters. A full set of responses are provided in the Appendix.

Category	Online response	Letter	Total
Customers	60	0	60
Community groups	10	6	16
Councillors	17	1	18
Partner	40	19	59
<b>Total</b>	<b>127</b>	<b>26</b>	<b>153</b>

All material responses have been logged in the ['Register of Stakeholder Comments'](#). This captures all comments and challenges we received by email, during meetings, via the online consultations or by letter since we began developing the DWMP, and sets out our response. We have taken all comments and information provided into account wherever possible as we have developed the DWMP. This will be updated and published alongside our final DWMP in May 2023. The content of the Register is also being used to identify further development of the DWMP for cycle 2.

A full set of responses are provided in the Appendix to this report.

A report on the draft Strategic Environmental Assessment consultation is published separately on the ['Have your say'](#) webpage.

## 5 Analysis and summary of the consultation responses

This analysis reports on the responses received via the online consultation. There were 127 online responses out of the total 153. The remaining 26 responses were received as letters and we are unable to accurately quantify written responses or summarise the contents. However, the content of the letters is being taken into account in the [Register of Stakeholder Comments](#) and used to inform the DWMP as it is finalised. It will be published with our final DWMP in May 2023.

In the on-line consultation, we asked three questions to enable us to assess the priorities for our customers, community groups, Councillors and partner organisations and provided a total of ten statements to allow us to assess and quantify their views. There were associated free text fields beneath most of the statements to enable a qualitative overview of opinions and support. These can be read in full in the Appendix. These statements, questions and responses to them are set out below.



### 5.1 Questions to assess priorities and high-level views on the draft DWMP

#### *1: What are your priorities for future investment?*

The draft DWMP has published five future investment plans:

- Sewer Flooding
- Sewer Condition and Groundwater Pollution
- Storm Overflows
- Wastewater Compliance and Pollution
- Enhancing the Environment

The business has already committed to fully delivering the investment plan for Storm Overflows by 2030. We asked customers and stakeholders to prioritise which of the remaining four future investment plans is the most important to them.

*Note: Although the importance of addressing storm overflows is a given, a question relating to Storm Overflow preferences as set out under the Defra scenarios and options was asked separately: Statement 8 on page 50 below.*

All responses to this question have been aggregated and the investment plans ranked according to priority ratings (1st priority though to 4th) identified by consultees .

**Table 1: Aggregation of all responses**

Groups	Total			
Numbers	1st	2nd	3rd	4th
Sewer Flooding	28	18	28	28
Sewer Condition	15	47	34	9
Compliance	43	31	24	12
Environment	19	9	19	55
Percentages				
Sewer Flooding	27%	17%	27%	27%
Sewer Condition	14%	45%	32%	9%
Compliance	41%	30%	23%	12%
Environment	18%	9%	18%	53%

Across all responding groups the highest priority is 'Wastewater compliance and Pollution', followed by sewer flooding. This was followed by Sewer Condition, with the majority of responders placing this as their second or third highest priority. The lowest priority for most respondents is 'Enhancing the Environment'.

## Customers

**Table 2: Aggregation of customer responses**

Groups	Customer			
Numbers	1st	2nd	3rd	4th
Sewer Flooding	11	12	18	14
Sewer Condition	7	22	19	7
Compliance	30	16	9	5
Environment	7	6	10	29
Percentages				
Sewer Flooding	20%	21%	32%	25%
Sewer Condition	13%	39%	34%	13%
Compliance	55%	29%	16%	9%
Environment	13%	11%	18%	53%

For customers, compliance is the highest priority, and the second highest priority is sewer condition. Once again, enhancing the environment is seen as the lowest priority for most respondents.

Customers written responses explained why the environment was mostly their fourth choice. Investing in compliance and preventing flooding are seen as the most important options as these will reduce pollutions and nutrients and this will have consequent positive impacts on the environment. Some also commented that all options are of the highest priority and need addressing with equal urgency.

## Community Groups

**Table 3: Aggregation of responses from Community Groups**

Groups	Community Groups			
Numbers	1st	2nd	3rd	4th
Sewer Flooding	3	1	3	1
Sewer Condition	2	5	2	1
Compliance	1	3	3	3
Environment	3	0	1	4
Percentages				
Sewer Flooding	33%	11%	33%	11%
Sewer Condition	22%	56%	22%	11%
Compliance	11%	33%	33%	33%
Environment	33%	0%	11%	44%

Community groups are evenly split between choosing sewer flooding and enhancing the environment as their highest priorities. More than half have chosen sewer condition as their second highest priority and just under half have picked looking after the environment as their fourth priority.

As with customers, the community groups said that, in reality, all are equally important and asking for them to be ranked did not make sense. It is essential that all options are achieved. An improving environment will be the ultimate proof that the risks caused by our wastewater systems have been reduced. Given the predicted climate impacts, an equally important issue is effluent recycling which was not included as an option.

## Councillors

**Table 4: Aggregation of responses from Councillors**

Groups	Councillors			
Numbers	1st	2nd	3rd	4th
Sewer Flooding	5	3	2	4
Sewer Condition	3	8	3	1
Compliance	6	2	6	1
Environment	1	2	4	9
Percentages				
Sewer Flooding	33%	20%	13%	27%
Sewer Condition	20%	53%	20%	7%
Compliance	40%	13%	40%	7%
Environment	7%	13%	27%	60%

Compliance is seen as the highest priority, with sewer condition as the overall second highest priority. Enhancing the environment is again, the lowest priority for Councillors.

Councillors tend to agree that equal weighting should be given to all the options. A view was expressed that customers are unlikely to change their behaviours regarding sewer misuse if we are not compliant or it can be seen that we have not done everything possible to prevent pollutions and flooding. Sewer condition and groundwater pollution, sewer flooding and compliance should all therefore be prioritised.

## Partners

**Table 5: Aggregation of responses from partner organisations**

Groups	Partners			
	1st	2nd	3rd	4th
<b>Numbers</b>				
Sewer Flooding	9	2	5	9
Sewer Condition	3	12	10	0
Compliance	6	10	6	3
Environment	8	1	4	13
<b>Percentages</b>				
Sewer Flooding	35%	8%	20%	36%
Sewer Condition	12%	48%	40%	0%
Compliance	23%	40%	24%	12%
Environment	31%	4%	16%	52%

Preventing sewer flooding is the highest priority for partner organisations closely but Compliance scores highly as a first and second priority, closely followed by Sewer condition. Once again, enhancing the environment is the fourth choice overall for partners in terms of importance but it is of note that a significant number of respondents put enhancing the environment as their top priority.

For many partner organisations, ranking the issues is not sensible as all play an equal, interrelated and vital part in the future investment needs required. They should not be assessed in isolation. A holistic approach to all the issues is needed. Compliance and preventing pollutions can have the greatest effect on improving the environment and are likely to have the most beneficial impacts for our customers. For many, reducing the risks to compliance, sewer flooding and sewer condition are vital to provide confidence in the ability of our infrastructure to cope with growth and enable housing targets to be met.

## 2: What do you like about our DWMP?

*Note: this question was a “free field” response, so qualitative summaries are provided below.*

### Customers

Our customers clearly have different views on the draft DWMP. Just under half appreciate that it provides a systematic approach to considering major issues such as storm overflows, flooding and pollution. Although it is technical in its nature, it is clearly set out, provides a good overview of the issues and is a framework for understanding the separate strands of activity, all moving in the right direction. The right organisations have been working with us to develop the plan although we should be moving faster to tackle the issues earlier than proposed under the 20 – 30 year delivery timeframe.

However, many customers are disillusioned with our performance over the last decade and see the DWMP as far too little and too late. Some think the DWMP consultation is merely a public relations exercise in response to pressure from environmental and health groups. We should have ensured our waters were clean and safe rather than looking for ‘cheap fixes and profits’. If shareholders dividends had instead been invested in our wastewater systems these would, by now, be world class and the rivers and sea would already be clean and healthy.

### Community Groups

Half of the community groups did not find much in the DWMP to support. It was thought far too unambitious and would not deliver what the public would consider minimum standards of service. It is too vague and seems to set out to confuse.

However, others thought the draft DWMP the result of a lot of work and background research with the risks clearly set out. For these, the ambition was welcomed and, although it is clear that the challenges are great, the solutions are not necessarily clear and certainly not easy. Action is needed by multiple stakeholders.

### Councillors

Councillors responded that the Plan is well written, mostly easy to understand and very comprehensive. An honest attempt has been made to describe in layman’s terms the extreme challenges we face in trying to balance the demands made on our services.

They like many things about the DWMP including the acknowledgment that a radical step change is needed to ensure there is the right level of investment now and into the future. The investments are needed now to reduce pollution, improve monitoring, reduce storm overflows and improve the environment. It all needs to be implemented within a reasonable timescale as the problems facing our customers and communities are happening now. The solution should not be delayed

However, there is a view that the Plan is too little, too late, is simply green-wash and that we will continue with business as usual.

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## Partners

Most partners agreed that the challenges, aims and objectives had been clearly identified and liked the acknowledgment of the range of risks and the investments that will be needed to address these. They recognise that we have carried out extensive engagement with stakeholders and other groups and welcomed the additional Planning Objectives, incorporated at their request. These additional objectives help to consider wider issues and the links between them over and above the national planning objectives.

The proposition to tackle the root causes of the problems at source, such as for blockages, is recognised as the most effective and sustainable way to address the issues. There is strong support for tackling wastewater management in an integrated way particularly given the link between issues such as water efficiency and wastewater.

Partners were pleased that, for the first time, there is transparency of the scale of problems and environmental risks associated with the drainage and wastewater. The BRAVA assessment supported by the structured analysis that underpins the DWMP places this information in the public domain.

The longer term approach to investment planning being taken by the DWMP and the emphasis on catchment based and nature based approaches sets a clear road map for the future. However, the challenges will be how these are included within projects and wider infrastructure programmes, establishing responsibilities for maintenance regimes, and ensuring the resources are available to deliver within the timescales set out.

Stakeholders thought the structure of the plan is logically set out, as easy to read and follow as could reasonably be expected of a highly complex document, and is supported by appropriate appendices. There are good graphics and presentation of key information, particularly when identifying the problems and risks, giving examples of solutions and identifying investment needs.

### 3: What do we need to improve in our DWMP?

*Note: this question was a “free field” response, so qualitative summaries are provided below.*

## Customers

Many customers think our DWMP should be much shorter and clearer. It seems to be written to deter customers from reading it. It needs to clarify what specific issues have been identified and needs an action plan setting the specific things that need to be done to mitigate the risks. Some think that the risks will only increase as more and more houses are built and so we need to be strongly proactive in objecting to extensive developments where the infrastructure cannot support it.

Some customers don't like prioritising the risks as everything needs investment to prevent pollution and protect the environment.

However, a few recognise that it has taken a great deal of time, deliberation and input from a wide range of experts to develop the DWMP.

## Community Groups

Community groups also think the plan is daunting in terms of the amount of information it contains. It is technically challenging for non-experts to read. The issues are often repeated but under different headings. The website is sometimes difficult to navigate, and it is not always clear where particular locations are so this needs more detailed information.

They do not think we are being honest, with our customers, regulators or ourselves, about our performance. We should focus on having sewer networks that are fit for purpose and have the capacity to deal with all but the most extreme climate conditions. More emphasis on local knowledge and local geography should be integrated into the next iteration of the DWMP. Meaningful long-term targets and realistic timescales should be incorporated.

We should more clearly set out the proposed solutions to the challenges and how these will be financed. We also need to set out even more clearly the consequences for the environment and society if these challenges are not met.

## Councillors

Councillors say we have not done enough to publicise the consultation to our customers and there needs to be a simplified version to share with them to inform them of our future plans which ignores the regulatory bias. The costs of delivery of the Plan should be expressed in terms of money and impact to environment.

Councillors think the DWMP should be far more radical in its approach, for example, more plans for recycling wastewater effluent as a new source of water supply. We need to invest enough in our infrastructure to prevent sewage being released into waterways and the countryside, classing every wastewater system as 'improve' and prioritising every issue rather than picking a few. More needs to be done and sooner as the timescales set out in the plan are too long. The environment is not dispensable.

To restore confidence amongst customers and other interested parties, we should include an undertaking that regular, transparent progress reports on plan delivery should be made public.

## Partners

Partners acknowledge that the DWMP is a wide-ranging document and geographically covers a vast area. However, it would have been helpful to have a brief summary of the main impacts on smaller catchment areas of interest to customers, communities, local authorities and policy-makers. The addition of a non-technical executive summary in each of the five Investment plans would be helpful for the general public. Overall, there seems instead to be an emphasis on meeting the expectations of our regulators.

Some would like us to be more radical in our approach. For example, we could be considering the potential to build additional treatment works and systems in some areas or looking for regulatory changes. A financial inducement / recompense scheme could be considered for landowners, including local authorities, to introduce infrastructure that reduces rainwater runoff into combined sewers. Developers should be directed to abide by sustainable policies. There

could be more explanation of what ‘do nothing’ or alternative investment strategies would look like.

The data used to underpin the BRAVA (Baseline Risk and Vulnerability Assessments) should be more up-to-date, particularly relating to growth, as this could affect the risk bands identified and better inform investment decisions. Emerging Local Authority Plans should be taken into account for investment planning. There needs to be greater transparency around the appraisal methods to provide a greater insight into the cost and benefit calculations for different options and multiple benefits that inform best value plans.

Partners have expressed a desire to better understand the interactions of our assets with the wider environment. They have requested that we enhance our hydraulic modelling capability and provide greater transparency of predicted surface water and sewer flooding. Partners have also asked that more data should be shared with them, using clearer plans and maps and a better collaborative GIS mapping system.

Some partner organisations have expressed disappointment that issues discussed during the workshops were not represented in the investment tables. A few have requested some clarifications or amendments to be made to information in the document. Some think our focus has been on bathing and shellfish waters and are disappointed that water quality and achieving Good Ecological Status in inland waterbodies seems to have been overlooked. However, many are pleased to see that studies to better understand the impact of nutrients in our effluent have on designated sites in our region, in the context of wider contributions, are included in our investment needs. Several have also said they are pleased to see groundwater pollution, infiltration and exfiltration considered and incorporated. The DWMP should be subject to the Habitats Regulation and an assessment carried out for the designated sites across the region.

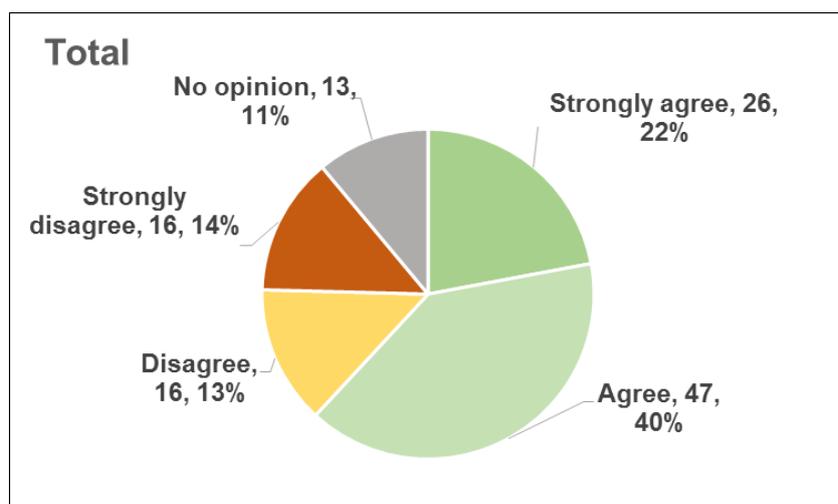
It has been noted that consultation should not be viewed as a single event but the start of an ongoing process of engaging with our communities on the issues that affect them. They want to see more commitment to partnership working at both a strategic and local level and more alignment with, and emphasis on, local nature recovery strategies. Assurance should be provided that the goals outlined in the DWMP will be attainable within the specified delivery timescales. The DWMP should be used to create an effective framework to include all organisations within the sector and produce effective strategic long term partnership plans for water stewardship for the future.

★ ★ ★ ★ ★ ★

## 5.2 Statements to quantify and assess customer and stakeholder views

*Statement 1: The main challenges for drainage and wastewater management are identified in the DWMP.*

A total of 118 responses were received to this statement.



Strongly Agree	
Agree	
No opinion	
Disagree	
Strongly Disagree	

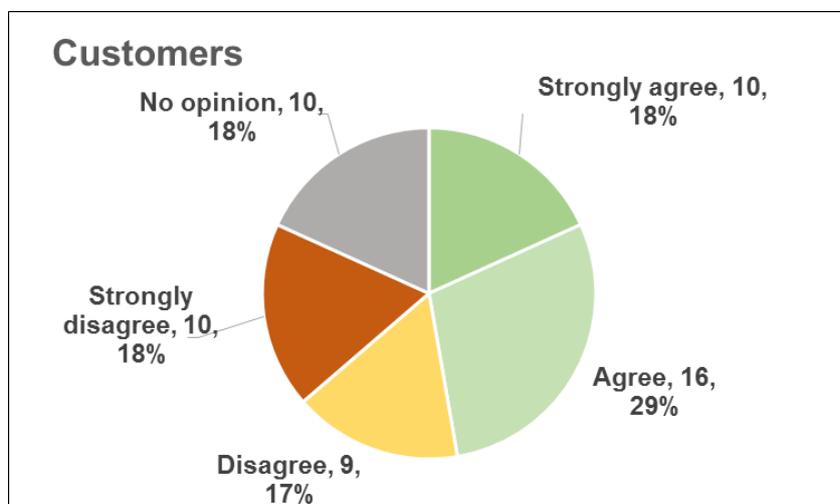
62% of responders agreed or strongly agreed that the DWMP captures the main challenges for drainage and wastewater management across our operating area. 27% either disagreed or strongly disagreed and 11% had no opinion on the issue.

The responses to this question broken down into the four participant segments is set out below:

Category	Strongly agree	Agree	Disagree	Strongly disagree	No opinion	Total responses
Customers	10	16	9	10	10	55
Community groups	1	3	1	3	2	10
Councillors	2	6	4	3	0	15
Partner	13	22	2	0	1	38
<b>Total</b>	<b>26</b>	<b>47</b>	<b>16</b>	<b>16</b>	<b>13</b>	<b>118</b>

## Customers

55 customers responded to this statement.



29% of these agreed and a further 18% strongly agreed that the DWMP identifies the main challenges for drainage and wastewater management, an overall total of 47% of the customers who responded. 17% disagreed and 18% strongly disagreed with 18% having no opinion.

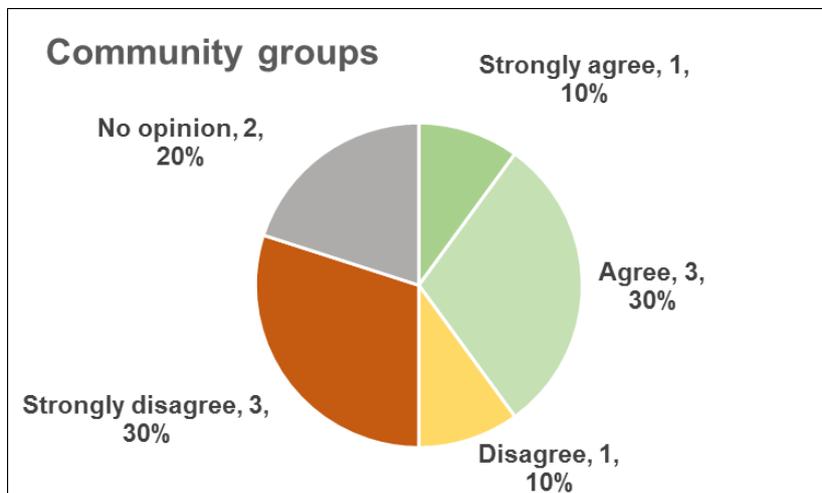
The consultation responses from customers told us there should be a focus on preventing sewage releases into rivers and coastal waters. There is a recognition that investment is urgently needed in our infrastructure and that climate change is exacerbating flooding and spills. Some customers think we should be re-nationalised as our focus is profits rather than caring for the environment. At the least, Ofwat should have more oversight of our operations and dividends to our shareholders should be suspended until these issues are fully addressed.

Some think the lack of sewage capacity to meet Government house building targets is the most important challenge and that new connections to the sewage network should be restricted until there is adequate capacity - either by upgrading the existing wastewater treatment plants or by building additional capacity. There are also concerns that the draft DWMP did not acknowledge the potential pollution from old communal septic tank outflows into river systems.

Some customers think one of the main challenges is the urgent need to address the significant level of biodiversity depletion. The expanding population is increasing demand on shared, finite resources and education is needed so that there is less waste that contributes to the environmental crisis we are facing. We should be working to ensure that there is no further deterioration in the health of aquatic environments.

## Community Groups

10 community groups responded to this statement.

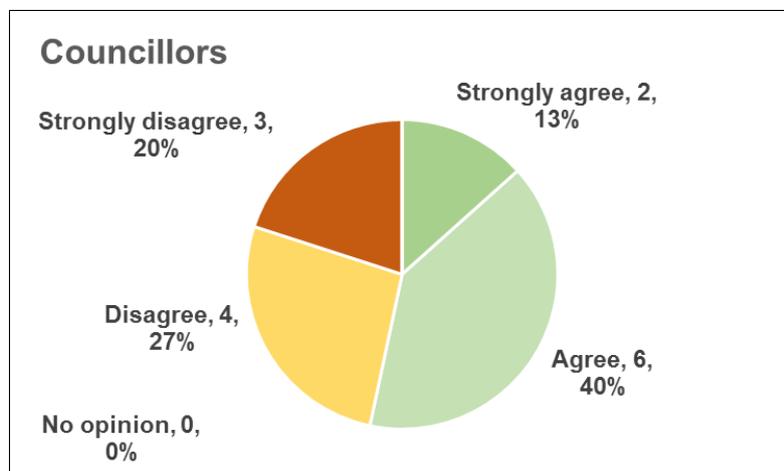


Of these, 40% either agreed or strongly agreed that the DWMP identifies the main challenges for drainage and wastewater management. However, 50% disagreed or strongly disagreed with a further 10% offered no opinion.

Some community groups think that the main challenge is political. Regulations should be changed so that we are able to refuse connections to new development where there is not enough capacity. Products labelled as flushable that are non-dissolvable should be banned. There should be compulsory oil and fat traps in all commercial premises and, where practical, domestic settings, to prevent blockages from taking place. Higher environmental standards and expectations are required along with stricter monitoring of compliance and enforcement. Most think that preventing storm overflows from spilling and polluting the environment is the most important challenge ahead.

## Councillors

15 Councillors responded to this statement.

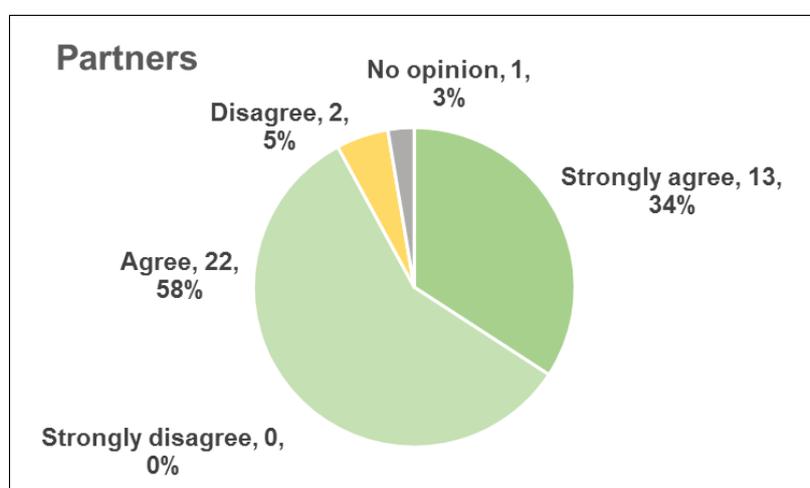


53% of Councillors agreed or strongly agreed that the DWMP identifies the main challenges for drainage and wastewater management. However, 47% disagreed or strongly disagreed and 20% had no opinion.

For Councillors, separating foul from rain water systems wherever possible is a top priority to prevent flooding and routine spills from storm overflows. Integrated catchment-wide planning to address multiple issues and addressing underinvestment in our ageing assets to ensure these can cope effectively with rapid population growth is urgent. Some want to see the water industry made a statutory consultee when it comes to development planning. Tackling water and nutrient neutrality and tightening of permits in designated sites such as Chichester Harbour and the Arun Valley is critical.

## Partners

38 of the partner organisations we have been working with to develop the DWMP responded to this statement.



92% agreed or strongly agreed that the DWMP identifies the main challenges for drainage and wastewater management, with only 5% disagreeing. 3% had no opinion.

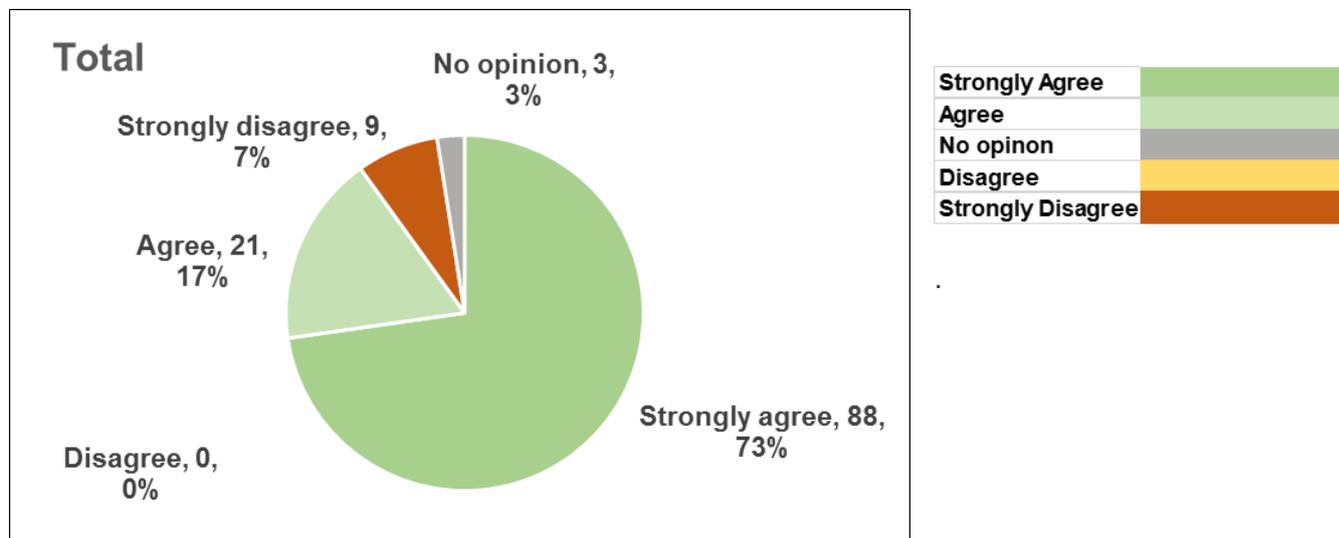
Partner organisations want issues connected to aging assets addressed to ensure these can cope with the proposed levels of growth across the region. There is a concern that our estimation of growth, based on Experian data, is underestimated. It falls short of their own growth forecasts particularly when it comes to the development of new garden cities and villages. The locations and associated delivery timescales are vital to meet the requirements of Nutrient Neutrality.

Some are concerned that our focus is on coastal and bathing waters rather than inland rivers and waterbodies. They believe that we have not thoroughly considered the impacts of droughts, flooding, coastal erosion and sea level rise on our assets. It is seen as vital that the deteriorating ecology of inland waters is addressed as well as protecting groundwater from pollution. Issues need integrated, nature-based solutions and collaborations, particularly when tackling separation of foul and surface water systems which holds the key to multiple benefits.

Others have highlighted the importance and challenges of keeping customer bills affordable whilst meeting government, regulatory and customer expectations.

*Statement 2: Southern Water should collaborate with other organisations with responsibilities for water and protection of the environment to improve the management of drainage and wastewater*

We received 121 responses to this statement.



90% of the total responders strongly agreed or agreed that we should collaborate with other organisations to improve the management of drainage and wastewater. No one disagreed although 7% strongly disagreed and 3% offered no view.

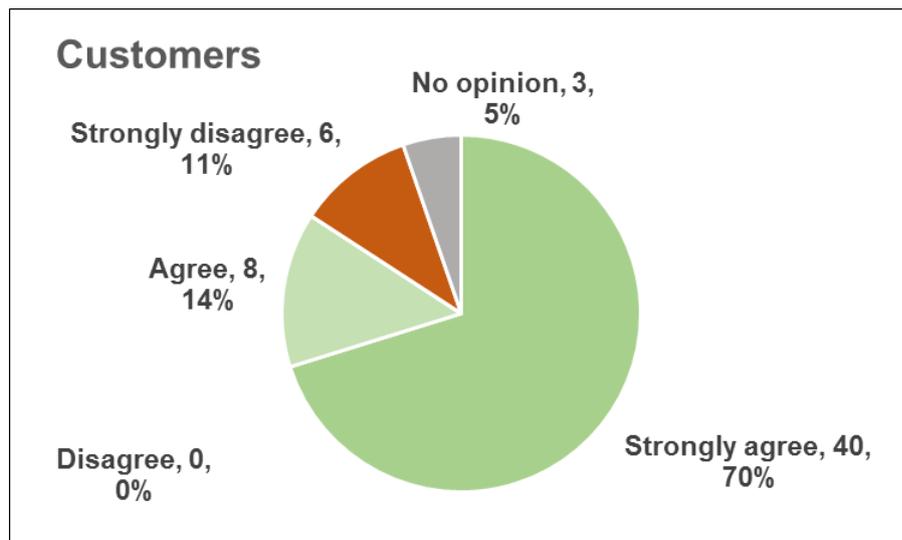
The responses to this question broken down into the four participant segments is set out below:

Category	Strongly agree	Agree	Disagree	Strongly disagree	No opinion	Total responses
Customers	40	8	0	6	3	57
Community groups	8	1	0	1	0	10
Councillors	12	4	0	0	0	16
Partner	28	8	0	2	0	38
<b>Total</b>	<b>88</b>	<b>21</b>	<b>0</b>	<b>9</b>	<b>3</b>	<b>121</b>

## Customers

57 customers responded to this statement.

Of these, 70% strongly agreed that we should collaborate with other organisations to improve the management of drainage and wastewater and a further 14% agreed. Although no-one disagreed, 11% strongly disagreed and 5% offered no opinion.

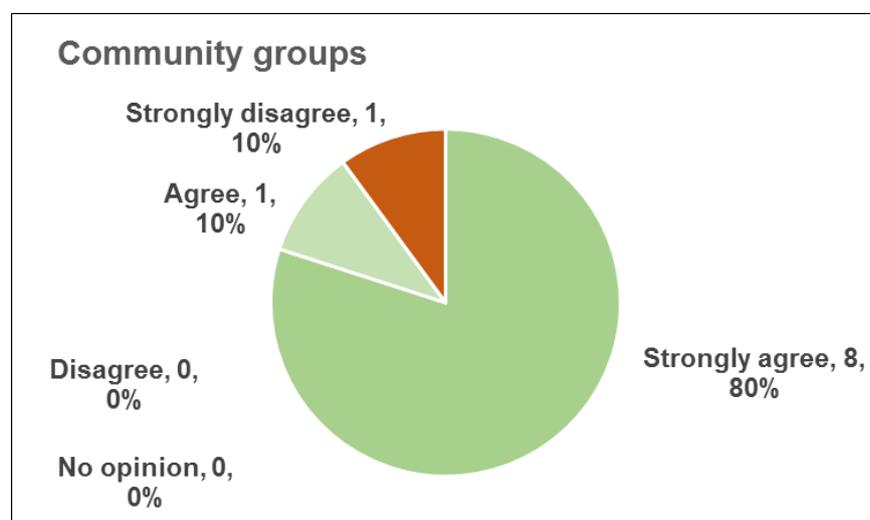


Overall, our customers agree that a co-ordinated approach to managing complex issues is more likely to yield long term and beneficial outcomes. Solutions cannot be managed in isolation by any one organisation. Working together will hopefully save time and money and create synergies by sharing resources.

There is recognition that all sectors have a role in protecting the environment, including developers. Our customers understand that we have a legal responsibility to connect services to new housing development. However, some expressed a view that we should be able to refuse connections on capacity grounds or, at least, work with local councils, the Environment Agency and other agencies to ensure that such housing is not permitted.

Some expressed a view that a previous lack of proper and timely investment alongside short-sighted, profit driven policies has led to the dumping of raw sewage into our sea and rivers, resulting in environmental damage and potential diseases. Collaboration does not absolve us of the responsibility to ensure that sewage is not pumped into the sea. If this continues, we should face “harsh penalties” if the practice continues with performance bonuses cut and jail sentences handed down to senior management.

### Community Groups



10 Community groups responded to this statement.

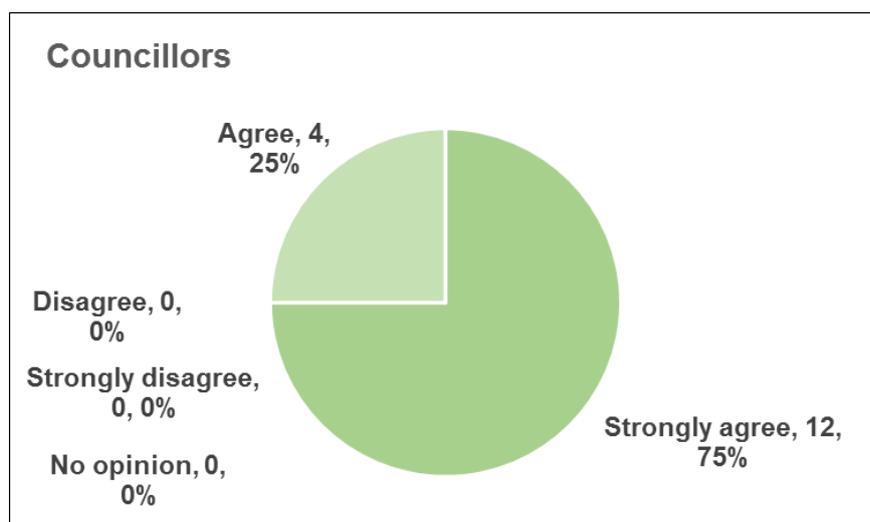
90% strongly agreed or agreed that we should collaborate with other organisations to improve the management of drainage and wastewater and, although no-one disagreed, 10% strongly disagreed.

A view was expressed that the EA and Ofwat are powerless in terms of protecting the environment and that we have exploited this to our advantage by not having effective wastewater systems. Unfortunately, privatisation seems to have led to a focus on profit and management bonuses rather than on essential public service delivery. A greater collaborative working relationship across funding bodies is needed and a move away from market-driven dividend motives.

We are not seen as solely responsible for solving all the issues as Councils, businesses and the Government all have roles to play. However, working collaboratively with environmental organisations is crucial for success and could help us go further and faster to deliver the improvements needed.

## Councillors

16 Councillors responded to this statement.



75% of Councillors strongly agreed and a further 25% agreed that we should collaborate with other organisations to improve the management of drainage and wastewater. No-one disagreed or strongly disagreed.

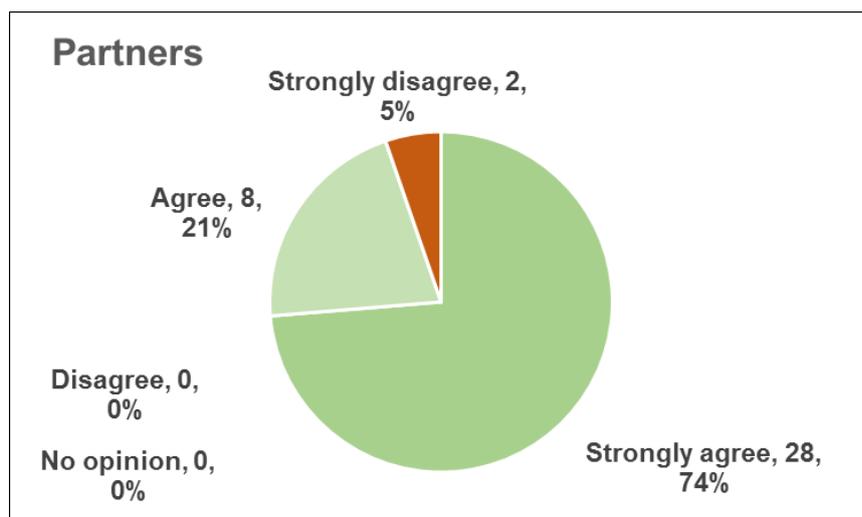
Councillors agree that the proposed improvements will only be achieved through collaborations and that environmental organisations can help deliver the softer benefits. Political alliances with local Councils, Government, Ofwat, the Environment Agency and Natural England are needed.

We should be a statutory consultee in the planning process to ensure the region is not overburdened by new housing and development. It is seen as part of our responsibility to push the Government to enact legislation to improve water quality, sewage processing, water

neutrality, nutrient neutrality and environmental protection with robust environmental standards and policies enforced. Costs should not be passed on to consumers and there should be increased fines for all organisations that breach environmental and health standards which should help fund investments.

## Partners

38 organisations we worked with to develop the DWMP responded to this statement.



74% partner organisations strongly agreed that we should collaborate with other organisations to improve the management of drainage and wastewater with it and a further 21% agreed, a total of 95%. Although no-one disagreed, 5% strongly disagreed.

There is overwhelming support for collaborative working. Working with many other agencies will be needed to carry out the improvement and enhancement work required. The DWMP could be transformative over its twenty five year lifespan if it works with others to identify and deliver the catchment scale and innovative projects that are needed. This requires a significant change in how we interact with the Risk Management Authorities and communities.

A point was made that we will always be responsible for delivering regulatory compliance outcomes within budgetary and timescale constraints no matter what collaborations and partnerships are developed.

Many organisations are disappointed that we seem to be relying on traditional storage tanks to solve storm overflows and flooding rather than the more sustainable, although longer term, separation and nature-based solutions.

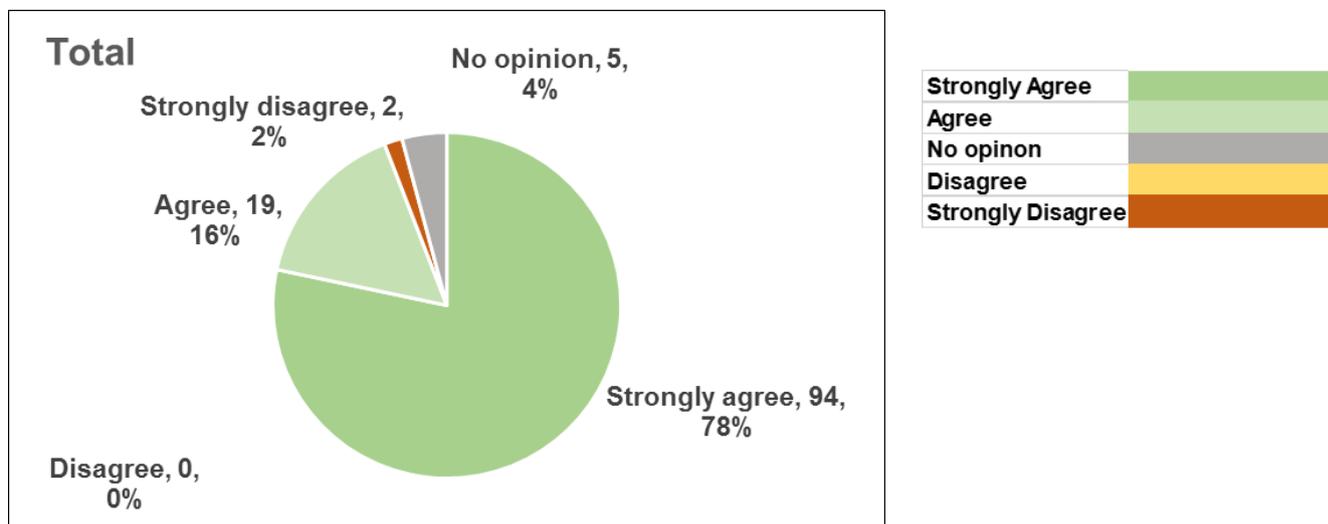
Developing coordinated and integrated plans for managing growth, the impacts of climate change and protecting and enhancing the environment at a catchment scale are key considerations. Partners agree that organisations such as highways (England and local council) need to take responsibility for road run off. Developers to ensure there is no additional run-off into our systems. The regulators and planners need to be more robust in terms of refusing development where it is not feasible. Agriculture and business should be responsible for

reducing their impacts on the environment.

We need to communicate more effectively to support collaboration and must continue to be open and transparent about the issues and our plans. More emphasis is needed on working with community groups to understand their perspectives and develop shared visions and goals.

*Statement 3: Rainwater from roads, roofs and other areas should be separated from the foul sewage systems, where possible, to reduce sewer flooding and storm overflows*

A total of 120 responses were received.



78% of responders strongly agreed that rainwater should be separated from foul wherever possible to reduce flooding and overflow spills. A further 16% agreed whilst 2% strongly disagreed and 4% had no opinion.

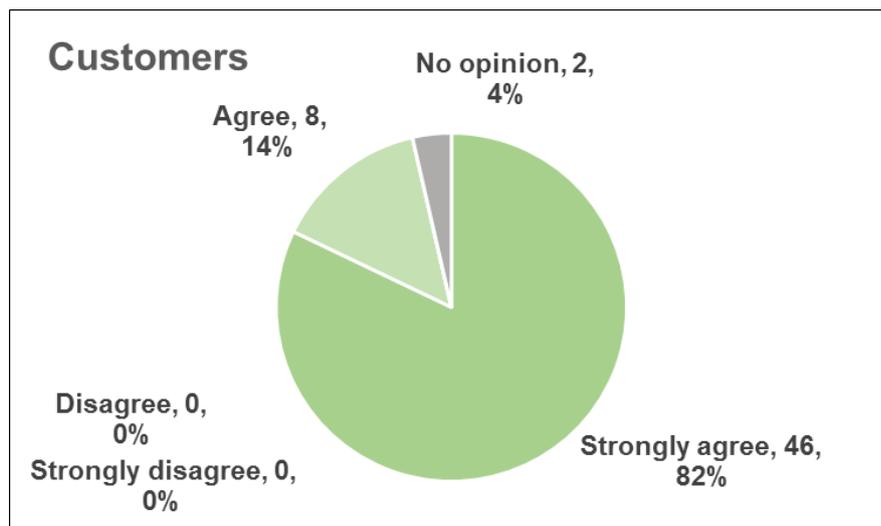
The responses to this question broken down into the four participant segments is set out below:

Category	Strongly agree	Agree	Disagree	Strongly disagree	No opinion	Total responses
Customers	46	8	0	0	2	56
Community groups	8	1	0	1	0	10
Councillors	13	3	0	0	0	16
Partner	27	7	0	1	3	38
<b>Total</b>	<b>94</b>	<b>19</b>	<b>0</b>	<b>2</b>	<b>5</b>	<b>120</b>

## Customers

We received 56 responses to this statement from our customers.

Of these, 82% strongly agreed with separating rainwater from the foul system and a further 14% agreed. 4% had no opinion and no-one disagreed or strongly disagreed.

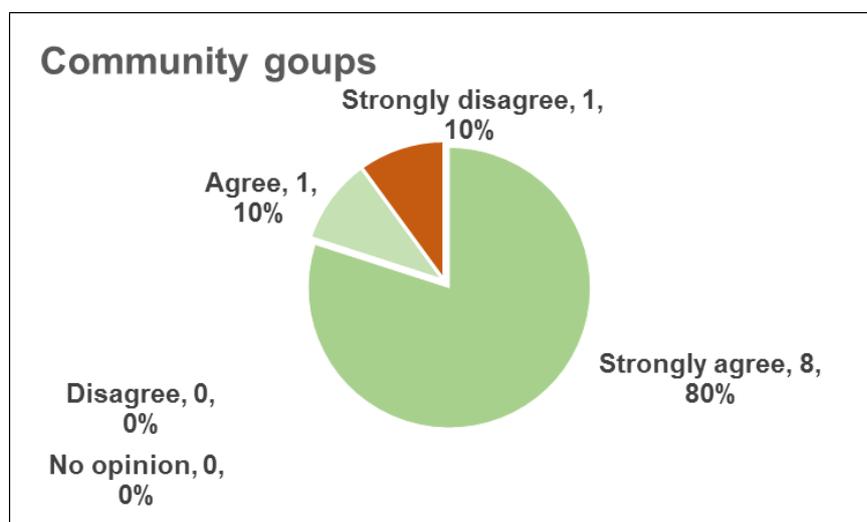


Customers think we must protect the environment, save and recycle effluent and not pollute. Some customers said that they pay their bills and expect us to sort out the issues to protect human health and the environment rather than use their charges to pay our shareholders large dividends. One customer thinks that we use rainfall as an excuse to get rid of sewage under the false pretence that it's due to storm conditions.

Despite this, some recognise that our wastewater systems are mostly old and were not built to cope with current and future population numbers or the weather patterns we are now experiencing. They agree that separating rainwater from foul systems is the sustainable route forward. The use of catchment wide and nature-based solutions will deliver additional environmental and social benefits for the communities to enjoy that will not be derived from purely traditionally engineered solutions.

## Community Groups

10 community groups responded to this statement.



80% of the community groups strongly agreed that rainwater needs to be separated from the foul system and a further 10% agreed. However, 10% strongly disagreed.

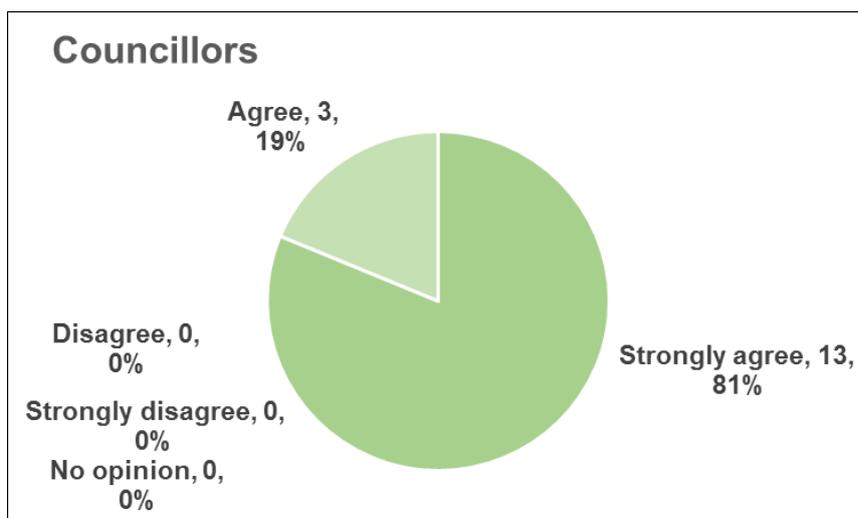
Separating rainwater at a property level from roofs and other areas is seen as a potential way of saving water to use in the garden during future climate change induced droughts.

However, communities have expressed great concern that many treatment works release untreated sewage every time it rains rather than only in storm conditions. Nature based solutions may be a long-term approach, but traditional storage methods will give a reliable solution. Separation through SuDS (Sustainable Drainage Systems) and other nature-based solutions is a worthy intention but the detail on how this might be achieved, especially in existing urban areas where it will be challenging, needs to be explained.

The impact of sewer flooding on a property and its mortgageability will be an increasing issue, as will the mental and physical health impacts on homeowners, but this is not recognised in the DWMP. There is a need for Southern Water to work with local councils to ensure building regulations and construction methods address the needs of designing effective resilience into new properties.

## Councillors

16 Councillors responded to this statement.



100% agreed or strongly agreed with the statement that rainwater should be separated from foul wherever possible to reduce flooding and overflow spills.

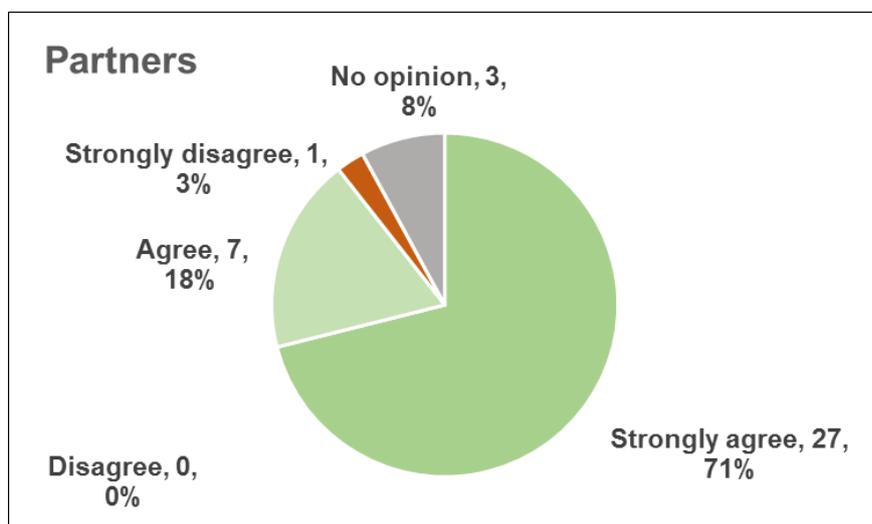
Councillors view combined sewer systems as the cause of the unacceptable number spills from storm overflows. Traditional engineering approaches have largely failed, and so separation is needed wherever feasible. Rainwater is seen as harmless to the environment and should be channelled away from populated areas and roads.

However, some think we need both traditional tank storage and separation through SUDS and nature-based solutions to prevent overflow spills, as long as they are fully reviewed and approved by the relevant statutory agencies before implementation.

We should work with local councils on public information programmes to raise awareness of the impact of urban creep, building wrongly connected extensions and paving over driveways.

## Partners

38 partner organisations responded to this statement.



71% strongly agreed that rainwater should be separated from foul wherever possible to reduce flooding and overflow spills and a further 18% agreed, a total of 89%. None disagreed although 3% strongly disagreed and 8% left no opinion.

Partners think separation will reduce the pressure on the wastewater networks and help to reduce the frequency of sewer flooding and storm overflows. New development must not be allowed to add to existing problems. There should be collective lobbying of the government for greater powers when it comes to land use planning and particularly on decisions around new housing and infrastructure. There needs to be further investigation about the impact separation would have on design and future development, including whether additional infrastructure is needed. The timescales for delivery and implementation need to be clearly set out.

Separation is likely to be a real challenge in existing urban environments, particularly those of a historic nature. Removing existing surface water connections from the combined sewer network to achieve a year-on-year reduction needs a coordinated approach to ensure the problem is not merely moved elsewhere. However, retrofitting solutions to reduce the impacts of flooding, remove pollutants whilst providing recreational, amenity and wildlife benefits should be pursued. The costs must be acceptable to customers. Collaborations are needed to influence decision-makers regarding sustainable drainage systems.

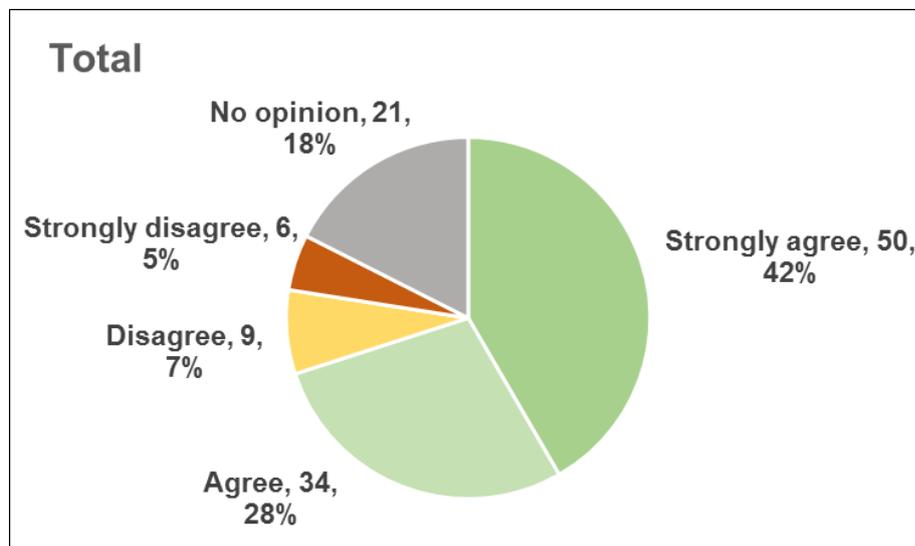
Other third parties must also accept they have a part to play, making separation even more complex. Farmers may need to be incentivised to deliver more sustainable agricultural practices. Highway agencies need to control and treat road runoff and should be strongly regulated.

Traditional engineering options should not be discounted. Solutions should be prioritised based on achieving wider objectives, funding availability, timing and the risk profile. A balance between

local quick win hard engineering solutions versus soft and/or wider scale solutions must be considered. There are some areas that are likely to require hard engineering approaches, for example to improve overall capacity at the WTWs or in towns and villages in vulnerable coastal landslide complexes. There, all water should enter piped disposal systems, and be kept entirely out of the ground as any water in the ground will reduce ground stability and help trigger ground movement, damaging our and other's infrastructure and properties.

*Statement 4: Catchment wide and nature-based solutions should be prioritised over traditional engineering approaches*

A total of 120 responses were received.



42% of responders agreed that nature-based solutions should be prioritised over traditional engineering approaches to reduce the wastewater risks and a further 28% agreed making a total of 70% support. 7% disagreed and another 5% strongly disagreed with 18% not offering an opinion.

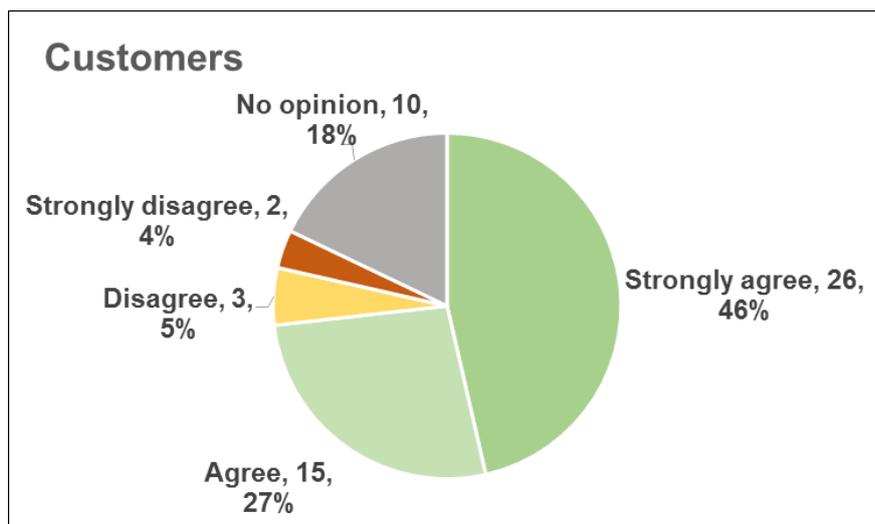
The responses to this question broken down into the four participant segments is set out below:

Category	Strongly agree	Agree	Disagree	Strongly disagree	No opinion	Total responses
Customers	26	15	3	2	10	56
Community groups	2	4	1	1	2	10
Councillors	7	3	2	2	2	16
Partner	15	12	3	1	7	38
<b>Total</b>	<b>50</b>	<b>34</b>	<b>9</b>	<b>6</b>	<b>21</b>	<b>120</b>

## Customers

56 customers responded to this statement.

18% had no opinion and 9% either disagreed or strongly disagreed that nature-based solutions should be prioritised over traditional engineering approaches to reduce the wastewater risks. However, a total of 75% strongly agreed or agreed, 46% and 27% respectively,



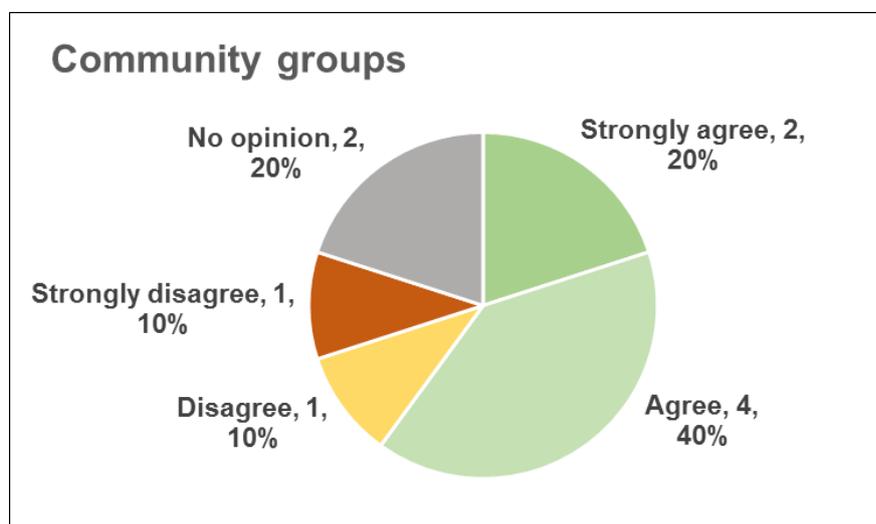
Customers want to be assured that the decisions made today will still be fit for purpose in 30 years' time. There are views that we need more stringent regulatory policies to ensure that the natural environment and ecosystems are not further destroyed by a corporate system that favours shareholders over people and the planet.

Others think that everyone is responsible for helping to solve the issues that the water industry is facing. Nature based solutions are seen as best in the long term and will deliver additional environmental and social benefits that would not arise from traditional engineering solutions. Additionally, they are likely to be less costly. However, the most appropriate solution should be used. Sometimes this might be traditional engineering and sometimes, catchment wide or nature-based solutions. Prioritising one over the other makes no sense.

Rainwater should be diverted to reservoirs to be made available to augment water supplies. A priority must be protecting drinking water by preventing pollution of groundwaters.

## Community Groups

10 community groups responded.

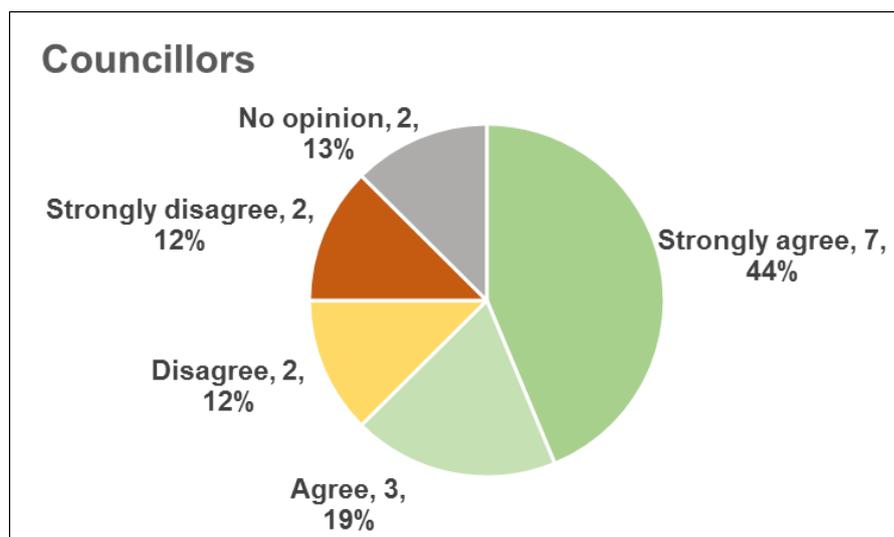


20% strongly agreed that nature-based solutions should be prioritised above traditional engineering solutions and a further 40% agreed. A total of 20% disagreed or strongly disagreed whilst 20% offered no opinion.

We received very few comments from community groups specific to this statement other than that nature-based solutions may be a more sustainable long term approach, but for the here and now, traditional methods may provide a more a reliable solution.

## Councillors

16 Councillors responded to this statement.



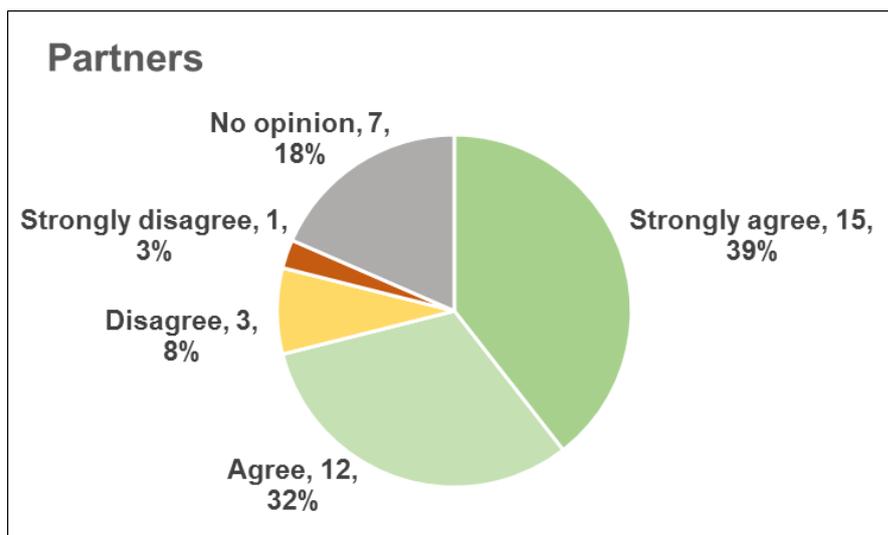
13% had no opinion, 24% either disagreed or strongly disagreed that nature-based solutions should be prioritised over traditional engineering approaches to reduce the wastewater risks. However, a total of 63% agreed or strongly agreed.

Councillors' comments include that we should invest in whichever systems are the most effective in preventing flooding and pollutions. The environment has been seriously compromised through lack of investment, and traditional engineering approaches have largely failed. Climate change and overall sustainability means we need to look at catchment and nature-based solutions to develop resilient systems as opposed to fixing one thing at a time that may cause an issue further along the system.

## Partners

38 partner organisations that we worked with to develop the DWMP responded to this statement.

Of these, 39% strongly agreed and 32% agreed that nature-based solutions should be prioritised over traditional engineering approaches to reduce the wastewater risks. 18% had no opinion and 8% and 3% disagreed or strongly disagreed respectively.



Partner organisations are supportive of the principle of prioritising nature-based solutions (NBS). There is ample evidence that NBS is the most obvious way to ensure multiple benefits are delivered across a range of objectives. They can make a big difference to flooding, water quality and quantity, actively contributing to restoring nature, protecting and improving groundwater quality, providing biodiversity enhancements, climate resilience and adaptation and offer less carbon intensive solutions. In some instances, NBS can be more cost effective in comparison to engineering solutions, which may require significant maintenance.

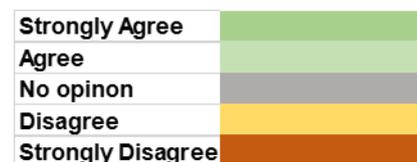
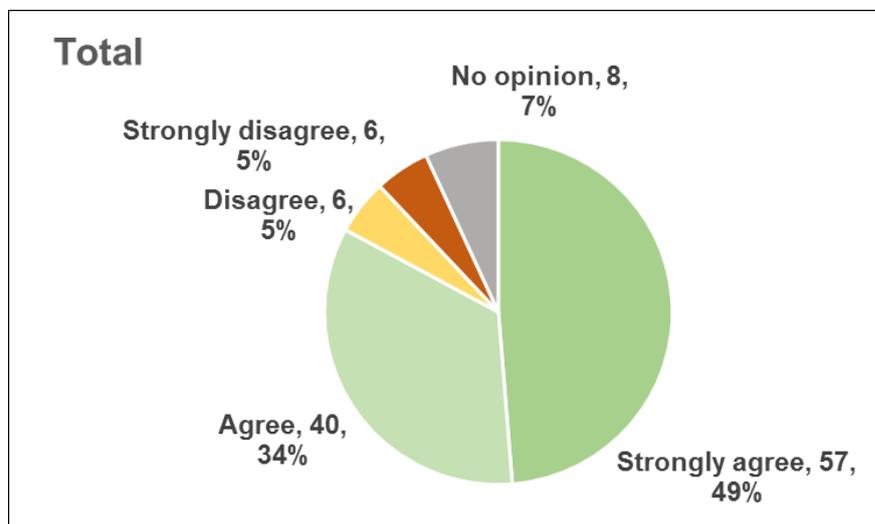
However, there are both positives and negatives in the balance of NBS compared to traditional engineering approaches. A mixture of grey-green approaches may be required to provide the best possible results. For example, engineering solutions will be needed to ensure wastewater treatment works are compliant with permit limits, tackling key nutrients such as nitrogen and phosphorus, and to reduce storm overflow events. It is likely that physical upgrades to the wider sewer network should form a key part of the overall solution.

Land in the South East is at a premium. There are multiple pressures on it and it is unclear whether the amount of land required for NBS is available. It is also recognised that many landowners do see the benefit in participating in NBS schemes. A holistic integrated catchment approach is needed with NBS aligned with Local Nature Recovery Strategies and used to contribute to off-site Biodiversity Net Gain requirements. There has to be awareness of when environmental limits are reached so that the environment is protected for the future.

The prioritisation of approaches depends on the location and a case-by-case approach should be taken to assess the cost-effectiveness and any secondary benefits that can be generated from either type of solution. Appropriate weightings must be applied. Examples could be weighting the carbon footprint of both construction and operation, or the additional benefits that can be delivered through alternative solutions including for local communities and their wellbeing. Cost effectiveness should include the funding available for NBS, the whole-life cost of a scheme and how much is available for long-term maintenance.

*Statement 5: Southern Water should prioritise best value options that reduce risks across many planning objectives and deliver wider multiple benefits over the longer-term, rather than least cost*

We received a total of 117 responses to this statement.



49% of the total responders strongly agreed that we should prioritise best value options to reduce the risks across the planning objectives rather than least cost. A further 34% agreed. 7% offered no opinion whilst the opinion of the remaining 10% was equally split between disagreeing or strongly disagreeing.

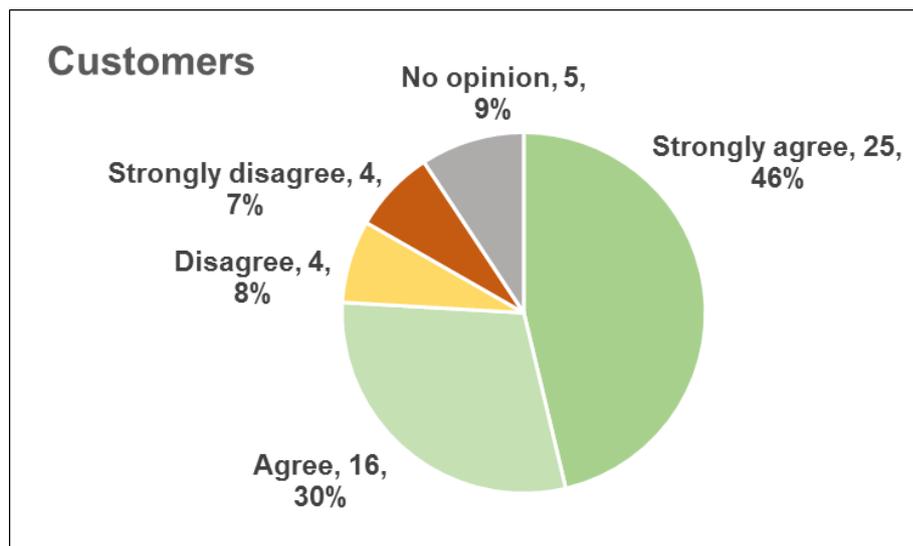
The responses to this question broken down into the four participant segments is set out below:

Category	Strongly agree	Agree	Disagree	Strongly disagree	No opinion	Total responses
Customers	25	16	4	4	5	54
Community groups	5	0	1	2	2	10
Councillors	10	6	0	0	0	16
Partner	17	18	1	0	1	37
<b>Total</b>	<b>57</b>	<b>40</b>	<b>6</b>	<b>6</b>	<b>8</b>	<b>117</b>

## Customers

We received responses from 54 customers to this statement.

46% strongly agreed that we should prioritise best value options to reduce the risks across the planning objectives rather than least cost and a further 30% agreed. 8% disagreed, 7% strongly disagreed and 9% expressed no opinion.



In general, our customers think that least cost is likely to prove least satisfactory. They think our priorities should be our customers, quality and the environment. Cost should not come into decision-making. Focusing on cost usually ends up being more expensive and 'least cost' solutions do not work in the long term. Cheaper options fail to meet their objectives, introduce additional problems further along the line, cause more environmental degradation and loss of biodiversity as well as impacts on human health and well-being. However, least cost investments that address pressure points should not be automatically discarded. They suggest we should change our investment approach to stop taking the low cost route although there are concerns about how the decision of what constitutes best value options is made. Evidenced, risk-based, best value decisions made with involvement from external stakeholders and partner organisations sounds reasonable.

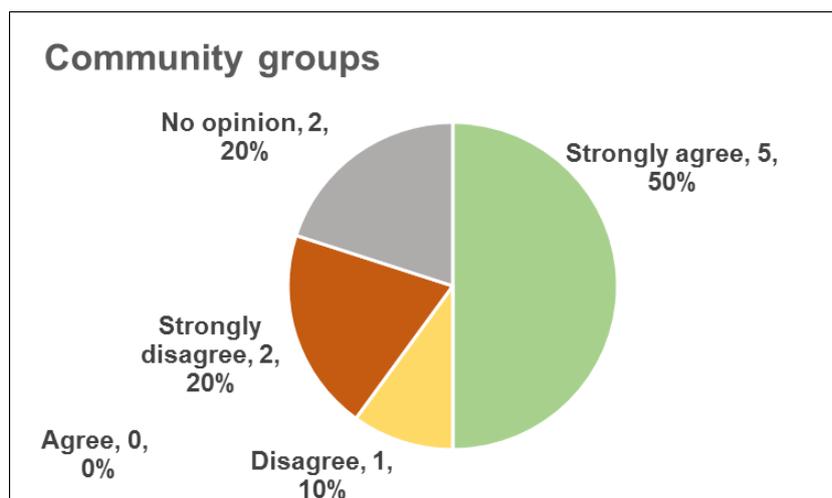
Customers want us to use the funding from their bills to ensure our systems are fit for purpose. They think unacceptable to expect them to fund the estimated costs of the solutions given the profits the company has made and the dividends paid to shareholders over the years. Shareholders will still benefit financially from longer-term planning. Return on investment should be measured decades rather than years.

## Community Groups

10 community groups responded to this statement.

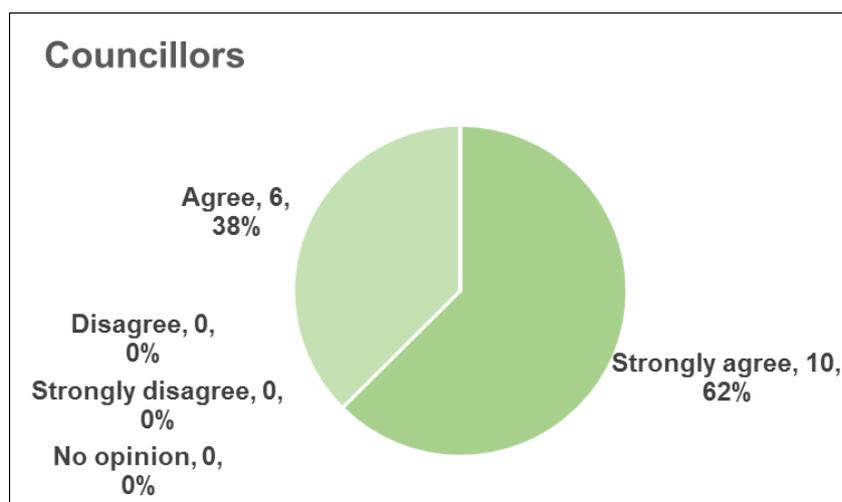
Half the responders, 50%, strongly agreed that best value options that reduce risks across many planning objectives should be prioritised over least cost. However, 20% strongly disagreed and a further 10% disagreed.

There are views that 'least cost' is a misleading term as the costs will still be passed on to customers. Further concerns expressed are that best value will mean many environmentally and ecologically critical sites will not benefit from investment as they have low population density. Decisions should be based on implementing the most effective solutions rather than cost-cutting, with greater investment across the board. Less money should be spent on bonuses and executive salaries.



## Councillors

16 Councillors responded to this statement.



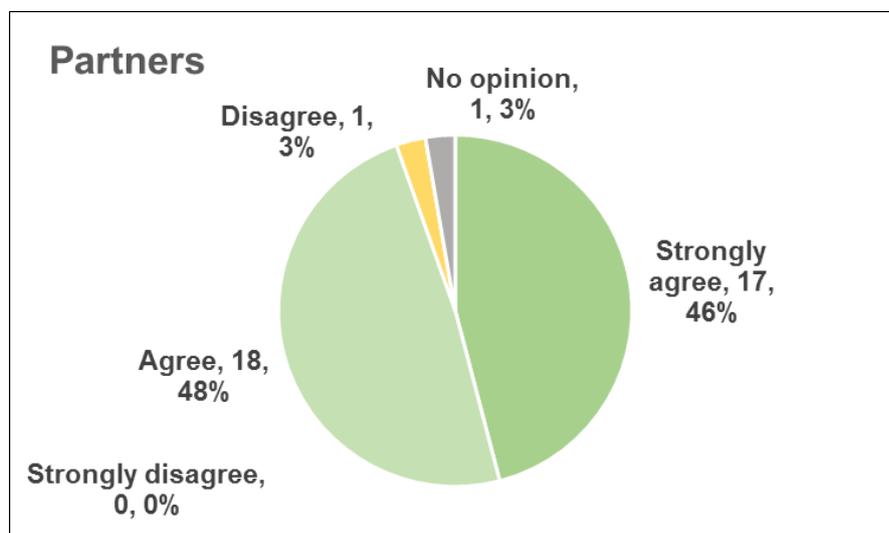
All the Councillors agreed or strongly agreed that best value options that reduce risks across many planning objectives should be prioritised over least cost.

When it comes to the protection of an environment, no expense should be spared. Cost alone should not be the greatest consideration. A price cannot be put on the natural environment and cost is not relevant in terms of safeguarding water quality from harmful bacteria and chemical substances and nutrient neutral water processing. Councillors recognise that our budgets are limited and should be used to best effect with achieving the long-term environmental objectives in mind. All funds required should be spent to achieve this.

Significant investment is well overdue. Profits need to be reduced to provide funding for all the requirements to be met. The income received from customers should be used do the job they pay us for rather than for executive salaries and shareholder pay-outs. A price has to be paid to significantly reduce damage to the environment and public health. Least cost is not an option.

## Partners

37 partner organisations responded to this statement.



A total of 94% of the organisations we worked with to develop the DWMP thought that best value options that reduce risks across many planning objectives should be prioritised over least cost. 46% strongly agreed and 48% agreed. Whilst no partners strongly disagreed, 3% disagreed and 3% expressed no opinion.

There is a view that least cost is continually chosen as the water industry regulatory environment is contradictory. Ofwat expects bills to decrease in real terms whereas the EA increasingly expects higher standards. The draft DWMP clearly outlines that significant investment is required and it is a high priority to minimise, if not eradicate, the risks to wastewater management. Budgets will never cover all the needs and difficult decisions will have to be made, but decisions and limitations on the eventual approach must be transparent. Any approach must ensure that the environment, future climate change and growth are addressed, especially where the modelling outputs are not currently definitive.

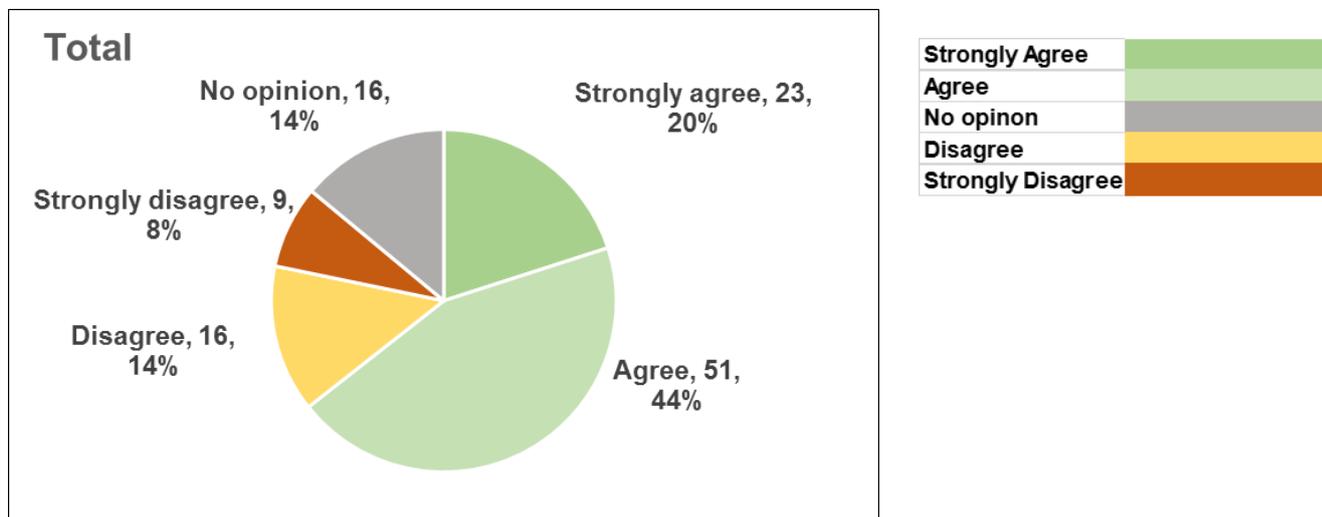
In general, partners agree that we should prioritise best value, sustainable and long-term solutions that reduce the risks across many planning objectives, address multiple issues and provide resilience within the system beyond the normal timeframe. A strategic and balanced approach to understanding the problem and fixing it in the best way, rather than the quickest or cheapest way, should be the approach. However, there may be circumstances where this is not appropriate, such as an opportunity to co-deliver a partnership project that is time sensitive.

A case by case assessment of the benefits of any proposed solution must be taken. In reality, the most beneficial solution is not necessarily the most expensive or the least cost but is likely to fall somewhere between the two extremes. Best value allows for larger, longer-term projects that might otherwise get discounted in a least cost scenario.

In general, best value solutions should be sought given the impact of any works on customer bills. NBS and catchment wide solutions are likely to represent the best value long term solutions and outcomes rather than traditional engineering solutions that might provide a faster, short term outcome but which come at a cost to the environment.

*Statement 6: The drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase*

We received 115 responses to this statement.



The responses to this question broken down into the four participant segments is set out below:

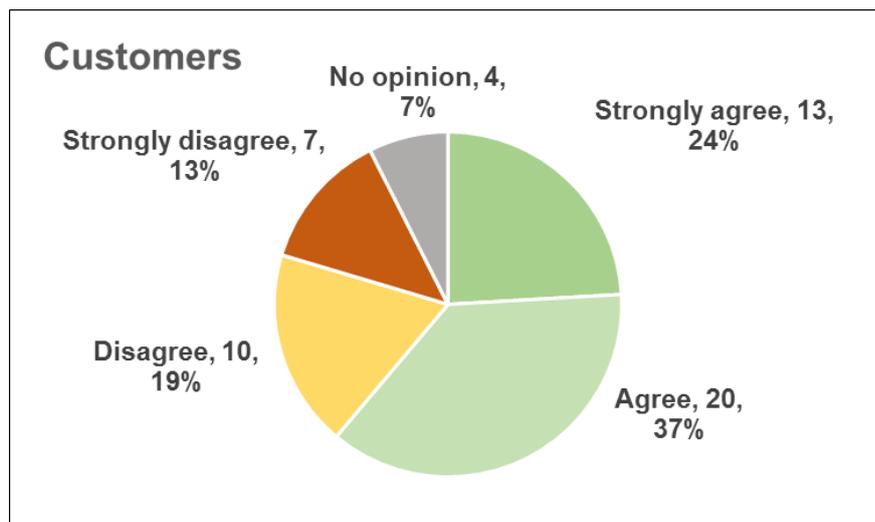
Category	Strongly agree	Agree	Disagree	Strongly disagree	No opinion	Total responses
Customers	13	20	10	7	4	54
Community groups	3	5	0	1	1	10
Councillors	3	8	4	1	0	16
Partner	4	18	2	0	11	35
<b>Total</b>	<b>23</b>	<b>51</b>	<b>16</b>	<b>9</b>	<b>16</b>	<b>115</b>

44% of responders agreed that drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase and 20% strongly agreed. 14% disagreed and a further 8% strongly disagreed. 14% offered no opinion.

## Customers

We received 54 responses from our customers to this statement.

37% of our customers agreed that drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase and 24% strongly agreed. However, 19% disagreed and a further 13% strongly disagreed. 7% offered no opinion.



The views customers expressed tend to contradict the answers given in the statistical analysis. Customers think we have exploited them to fuel shareholder dividends and that Band 0 should be achieved without significant bill increases. Director bonuses should not be paid and dividends must be reduced before customer bills are increased. Paying dividends is not seen as acceptable when customers are not receiving the services they pay for.

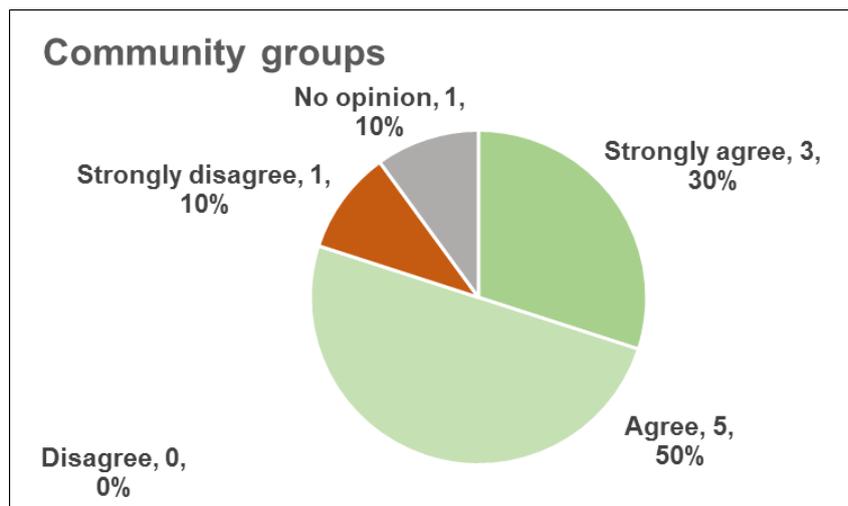
Some customers recognise that we have to make choices but say we must be transparent about the options being considered and the costs. Some may find the costs unacceptably high, although some will be fine with moderate increases as long as they can see tangible improvements and progress being achieved. Capping of charges to customers on low incomes or in receipt of benefits may be necessary. A suitable timescale for investment will be needed to ensure that customer bills remain affordable.

A blanket reduction of risks to a negligible level is probably unaffordable and may require bill increases over and above customers' willingness or ability to pay. Investing in reducing the risks to Band 0, which may be unachievable even if it desirable, may mean not being able to invest in other issues. It is a case of being proportionate. Catchment wide approaches and collaborative solutions could attract additional funding from outside agencies and ease the burden on customer bills but the blind pursuit of Band 0 for all risks at any cost is not logical. There must also first be a consensus as to what Band 0 means and especially required is a definition of 'not significant'.

## Community Groups

10 community groups responded to this statement.

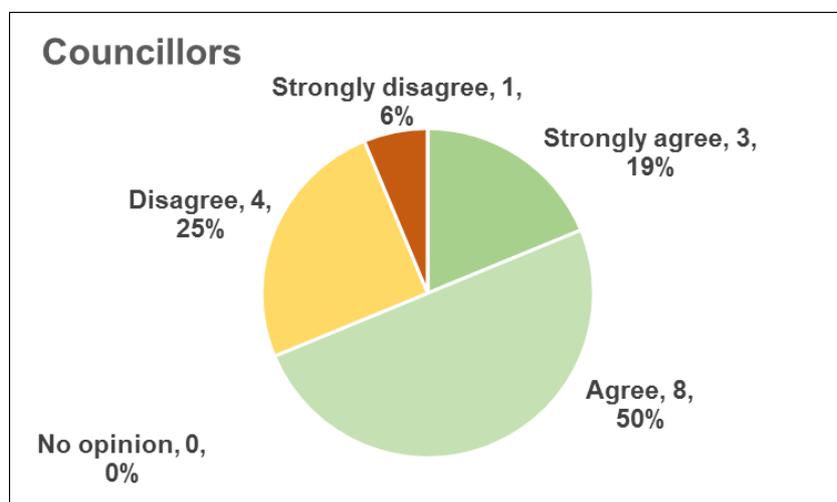
50% agreed that the risks should be reduced to Band 0 even if this means that customer bills would increase, and a further 30% strongly agreed. Although no responders disagreed, 10% strongly disagreed. 10% had no opinion.



Community groups think costs and pricing is a matter to be determined between us and our regulators. However, we are charging our customers heavily for a service we are not providing to an acceptable standard. The polluter pays principle means that customers should expect to contribute to the costs of managing pollution issues, but funding should not be sought solely from our customers. A proportion should be met through reducing the company's profits, executive bonuses and shareholder dividends, as well as from general taxation to reflect the wider economic, social and environmental benefits.

## Councillors

16 councillors responded to this statement.



50% of the Councillors agreed that drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase and a further 19% strongly agreed, a total of 69%. 25% disagreed and a further 6% strongly disagreed.

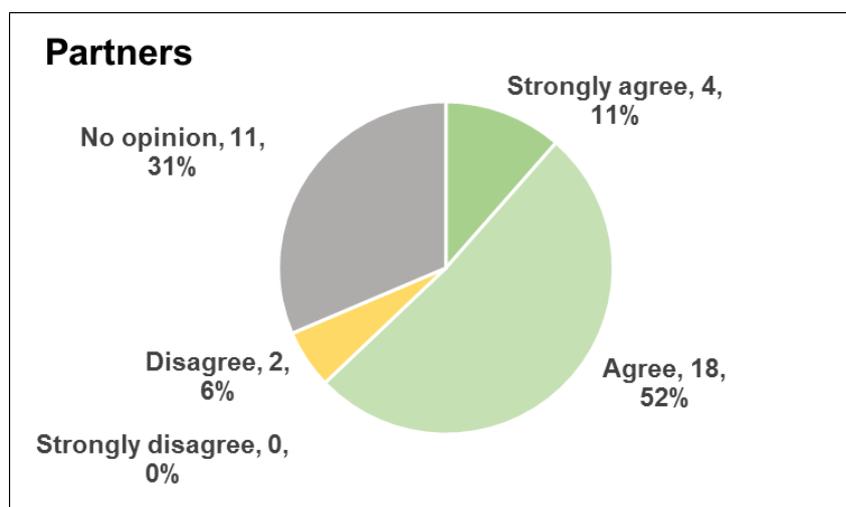
Councillors think that society cannot continue to ignore the 'real' cost of our water but shareholder dividends should be restricted to pay for the work required before any increase in customer bills is considered. Customers should not have to fund investment in wastewater systems which should have been budgeted for years ago. However, investments are a must even if that means increasing customer bills because the risks of doing nothing is no longer an

option. The reduction of risks must be prioritised but the cost must be proportionate to people's ability to pay. Any investments must ensure we are prepared for the future. In addition, customer education to reduce water usage and prevent blockages is important.

The Government should enact standards on storm overflows and provide investment to ensure this is delivered to the satisfaction of our customers and regulators. We should be subject to overview from a government watchdog with 'proper teeth' to ensure that customers' money is being properly and efficiently used.

## Partners

35 partner organisations responded to this statement.



52% agreed with that drainage and wastewater risks should be reduced to Band 0 (not significant) even if this means that customer bills would increase and a further 11% strongly agreed. 31% offered no opinion and 6% disagreed. No one strongly disagreed.

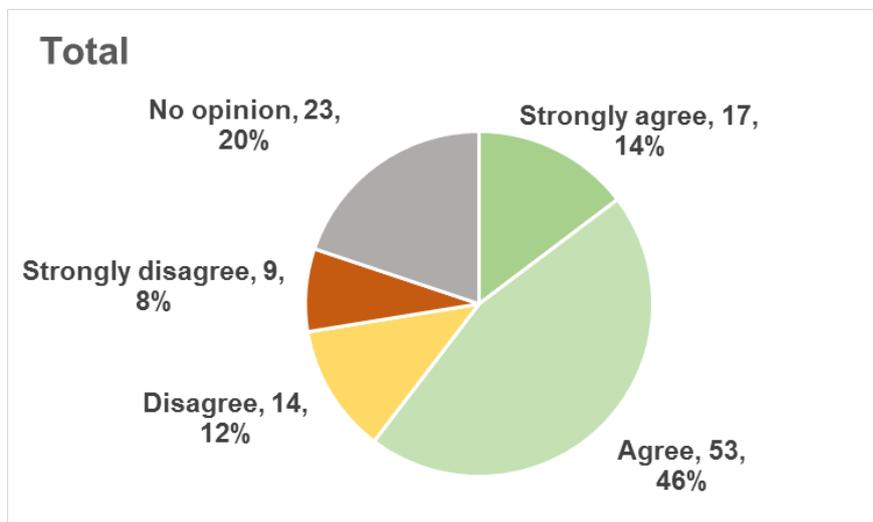
Of the 31% 'no opinion' responses submitted, there was a view that this should be a commercial decision between ourselves and Ofwat. Commenting was not appropriate. It was noted that we have an obligation, as a minimum, to be legally compliant with the law and regulations.

Of the 63% that agreed or strongly agreed, there was recognition that making the shift to significantly higher standards of wastewater treatment and very low risk of spills to the environment is going to cost a lot of money. A balance needs to be struck between addressing the identified challenges, making profits and ensuring customers' bills are affordable, a significant challenge particularly given the current cost of living crisis.

Some did not agree that costs should be passed on to our customers. Profits and shareholder dividends should be reduced and used to increase investment back into the infrastructure. A greater level of central government funding to correct historic issues should be pursued. Developer contributions should be spent where growth is taking place, and other sectors such as highways, agriculture and industry should pay a fairly calculated proportion of the costs. Other partners thought it may be necessary to increase customer contributions, but only where it is evidenced that the step change in delivery is taking place on the ground.

*Statement 7: I support the range and type of investment needs identified in the five Investment Plans*

A total of 116 responses were received to this statement.



Strongly Agree	
Agree	
No opinion	
Disagree	
Strongly Disagree	

46% of responders said that they supported the range and type of investment needs identified in the DWMP and a further 14% strongly supported it. 20% had no opinion, 12% disagreed and 8% strongly disagreed.

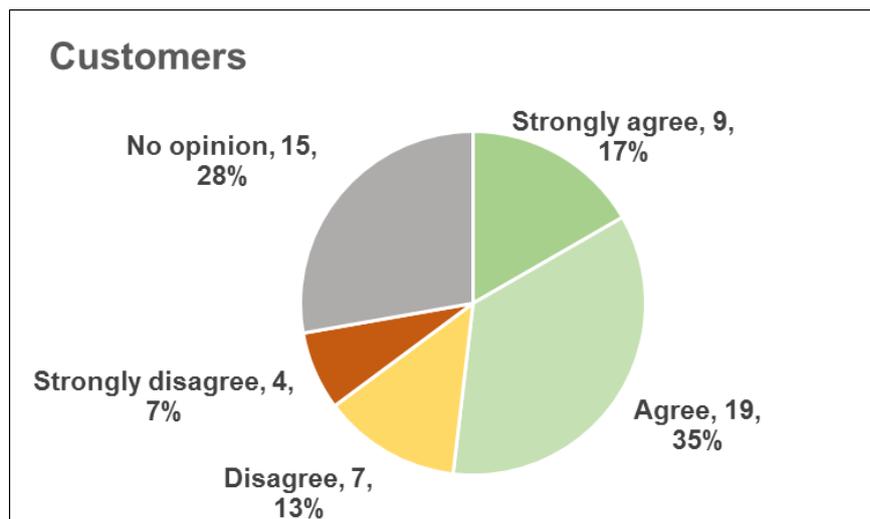
The responses to this question broken down into the four participant segments is set out below:

Category	Strongly agree	Agree	Disagree	Strongly disagree	No opinion	Total responses
Customers	9	19	7	4	15	54
Community groups	2	3	0	4	1	10
Councillors	3	7	2	1	2	15
Partner	3	24	5	0	5	37
<b>Total</b>	<b>17</b>	<b>53</b>	<b>14</b>	<b>9</b>	<b>23</b>	<b>116</b>

## Customers

We received 54 responses from our customers on this statement.

28% offered no opinion regarding the range and type of investment needs identified in the DWMP. A total of 20% of customers either disagreed or strongly disagreed with the range and type of investment needs identified in the five Investment Plans, at 13% and 7% respectively. However, 35% of customers agreed that they supported the range and type of investments identified and a further 17% strongly agreed, a total of just over half.



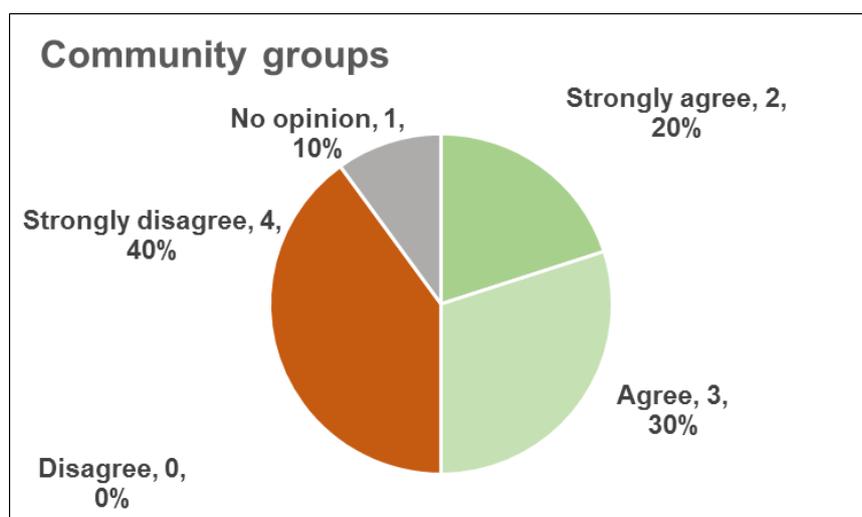
Our customers are very concerned about pollution and contamination. Many think the investment plans published in the draft DWMP will not sufficiently address these issues within an acceptable timeframe. Mistrust has been expressed in both our ability to address the issues as well as our intention to do so. They feel let down that our actions have not matched our promises. Because of this, many think there needs to be state intervention and profits reduced. Some think we should be renationalised.

Customers want more money spent more quickly to correct the pollution and overflow discharge problems from our systems as well as to increase capacity to cope with rising population.

They have also found the information provided in the draft DWMP overly complicated and the website confusing to navigate.

### Community Groups

We received 10 responses to this statement from community groups.



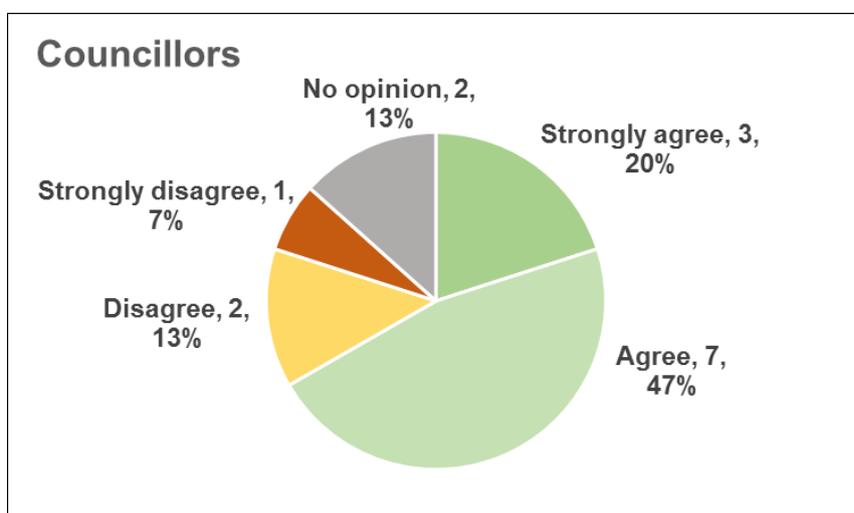
30% of the community groups responding agreed with the range and type of investment needs identified and a further 20% strongly agreed. However, although no group disagreed, 40% strongly disagreed and 10% offered no opinion.

Many community groups expressed similar views on trust as our customers. Some are concerned that we are under-reporting spills from storm overflows and do not think there is sufficient high-level commitment to action. They felt that the investment plans will not address the issues quickly enough. Storm overflows need to be tackled now rather than waiting for future funding periods. They expect our plan to be more radical.

However, if we implement the solutions outlined in the investment plans, a comprehensive resolution to current problems could be achieved.

## Councillors

15 Councillors responded to this statement.



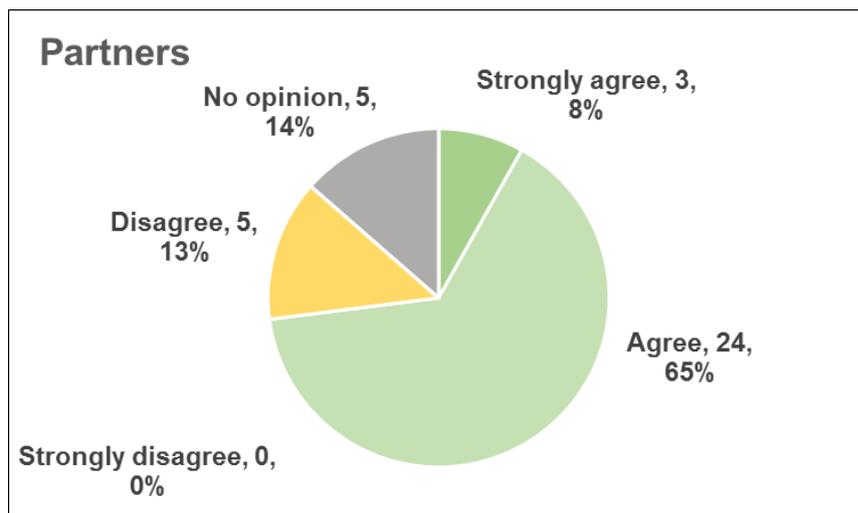
47% of Councillors agreed with the range and type of investment needs identified in the five Investment Plans and a further 20% strongly agreed, a total of 67%. Whilst 13% offered no opinion, 13% disagreed and 7% strongly disagreed.

Although the majority of Councillors support the investment plans saying they are wide ranging and comprehensive, a few think it is too little too late. Some are concerned that their local issues are not incorporated into the plan, or that the local issues that are recognised in the DWMP have been assigned a low priority status even though these are a very high priority to their residents.

## Partners

37 partner organisations responded to this statement.

65% of our partner organisations agreed with the range and type of investment needs identified and a further 8% strongly agreed. 13% disagreed but no one strongly disagreed. 14% offered no opinion.



Partner organisations are broadly supportive of the range and types of investment outlined in the draft investment plans. There is support for the source-receptor-pathway approach. The hierarchy of solutions that prioritises tackling the issues in this order is definitely seen as the right way forward.

However, partners are concerned the data we used to forecast and plan for growth means that the scale of development may be underestimated, particularly given Local Authority (LA) plans for new garden cities and villages in our region to meet government housing targets. This could have major implications for our infrastructure between over the coming decades so some are concerned that we will not be ready to support this level of growth.

The investment plans appear to have more emphasis on traditional engineering and storage tank approaches rather than SuDS (Sustainable Drainage Systems) and Nature Based Solutions. Many find this disappointing, especially as the need to restore and enhance deteriorating habitats and address nutrient issues are seen as a vital part of the DWMP. Some think we have focused more on improving coastal bathing and shellfish waters rather than inland waterbodies and rivers, also disappointing, as both should have equal weighting.

Partner organisations have picked up on the need to improve our models so that we can better understand the risks and choose the most effective solutions to address these, particularly for flooding and surface water drainage. The number of proposed studies to identify the contributions and impacts of our discharges on nutrients, ecological status and bathing and shellfish waters has been noted with concerns that this delays action. Stakeholders are looking for us to go further and faster to address these issues. However, they understand much of this will depend on gaining an enhanced understanding of the issues as well as the funding streams we rely on to finance the work required.

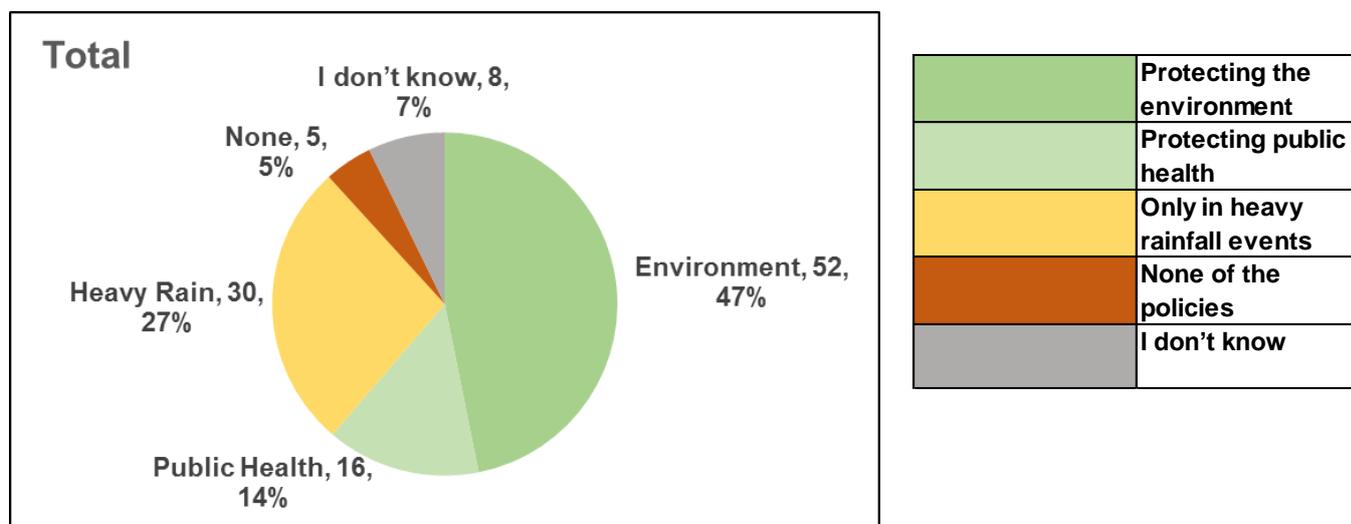
Many have also expressed that they are willing to work with us to co-develop and co-deliver partnership schemes that will benefit their communities, residents and interest groups and meet their own objectives as well as our own.

Statement 8: Defra is considering changing the requirements on water companies to address storm overflows. The cost of the three Defra scenarios is estimated. Which policy scenario(s) would you most support?

We received a total of 111 responses to this statement.

Note:

- A response of 'none' does not mean 'no response' but means 'does not support' any of the Defra scenarios.
- There was no free text field for this statement so only the statistical analysis is available below.



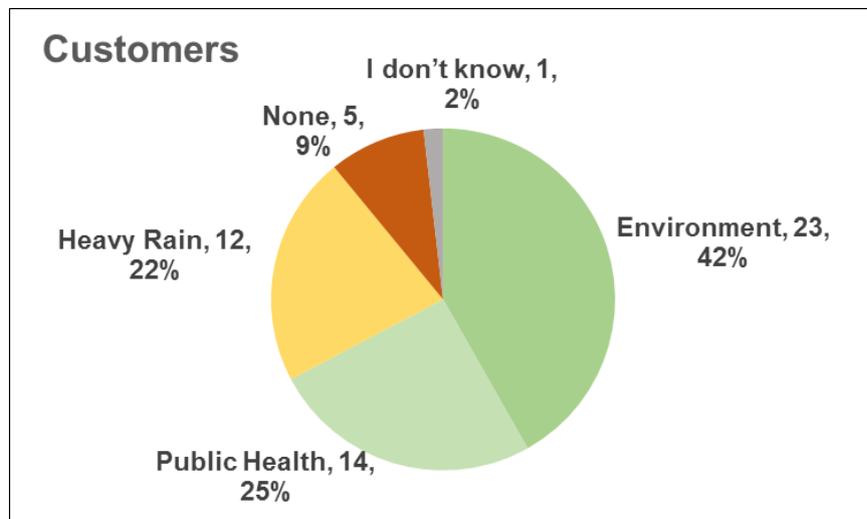
It is clear from the statistical analysis of the responses that the greatest level of concern is to protect the environment from the impact of spills with 47% of responders choosing this option. This is followed by 27% that think the policy should be to prevent spills from taking place only in heavy rain, then by 14% expressing concerns over public health. 5% did not support any of Defra's policy scenarios and 7% had no opinion.

The responses to this question broken down into the four participant segments is set out below:

Priority concern	Impact on Environment	Public Health	Only in Heavy Rain	None of these	I don't know	Total
Customers	23	14	12	5	1	55
Community groups	6	0	4	0	0	10
Councillors	9	0	6	0	1	16
Partner	14	2	8	0	6	30
<b>Total</b>	<b>52</b>	<b>16</b>	<b>30</b>	<b>5</b>	<b>8</b>	<b>111</b>

## Customers

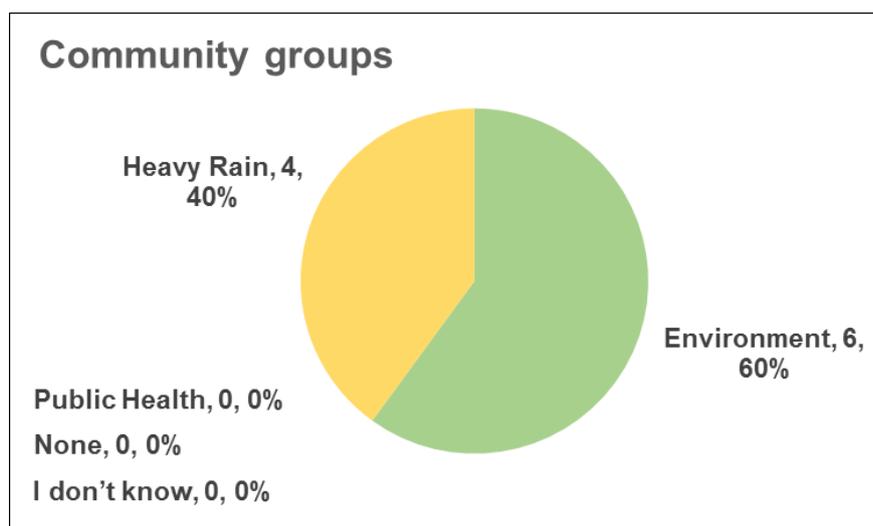
55 customers responded to this statement.



42% of our customers want the environment protected and 25% want to ensure there are no impacts on public health. 22% think storm overflows should only operate in heavy rainfall whilst 9% did not agree with any of the scenarios and 2% did not have an opinion.

## Community Groups

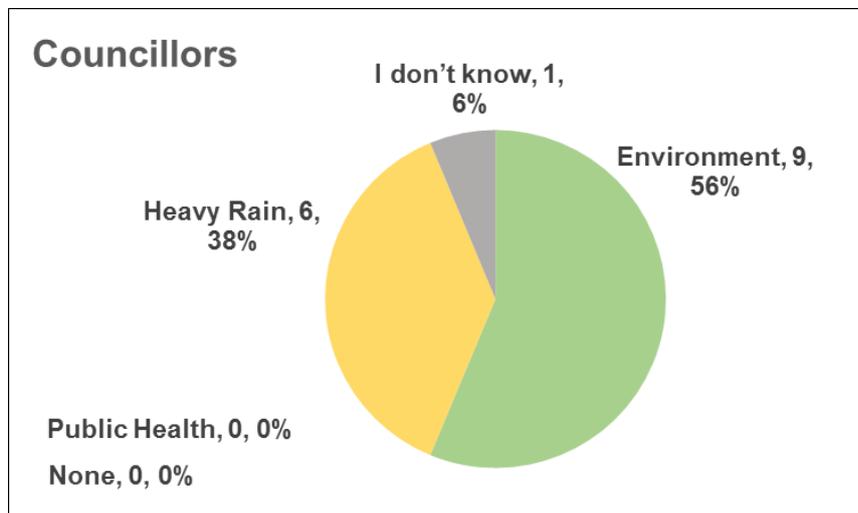
We received 10 responses to this statement from community groups.



60% of the community groups want spills prevented to protect the environment and 40% thought they should only operate in heavy storms. We received no views on preventing spills to protect public health and none chose the 'I don't know' or 'I don't support any of the scenarios' options.

## Councillors

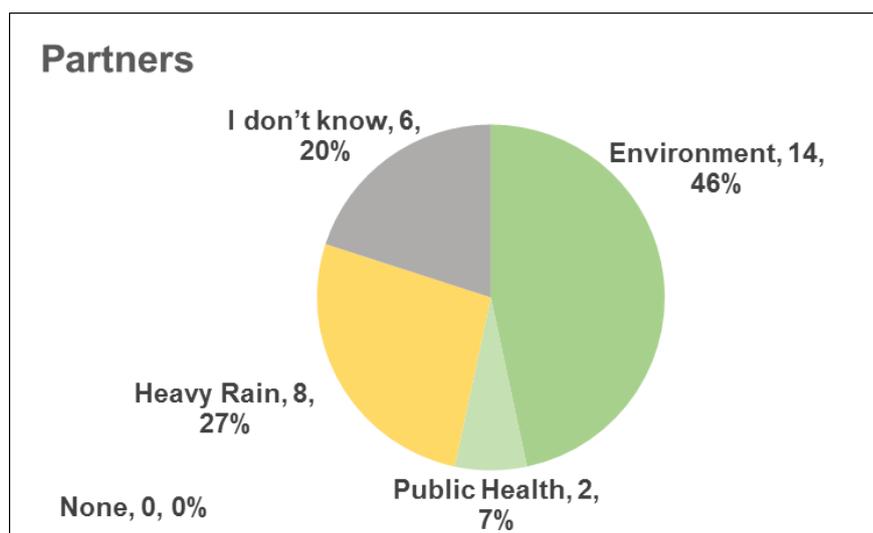
16 Councillors responded to this statement.



No Councillors chose the options to protect public health or said they did not support any of the Defra policy scenarios. 6% did not know which option was the most effective whilst 56% want the environment protected and 38% thought overflows should only operate in heavy rain.

## Partners

30 partner organisations responded to this statement.

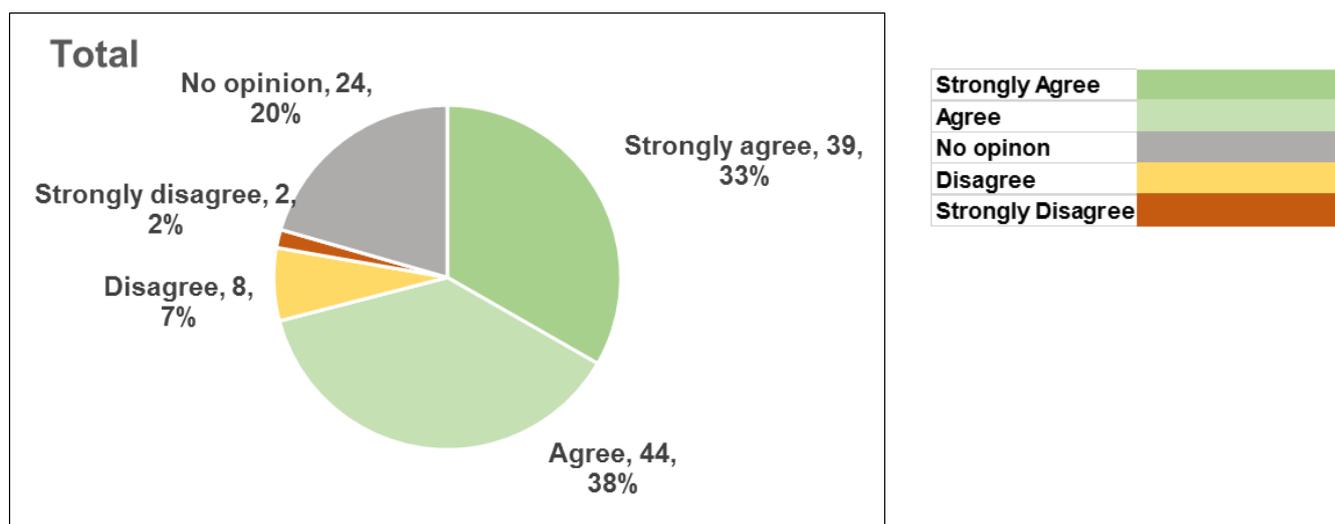


46% of partner organisations want the environment protected and 7% thought protecting public health was the most important issue. 27% thought overflows should only operate during heavy rainfall and 20% could not choose between the options. None chose the option of not supporting any of the Defra scenarios.

*Statement 9: The Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan*

We received a total of 117 responses to this statement.

*Note: there was no free text field for this statement so only the statistical analysis is available below.*



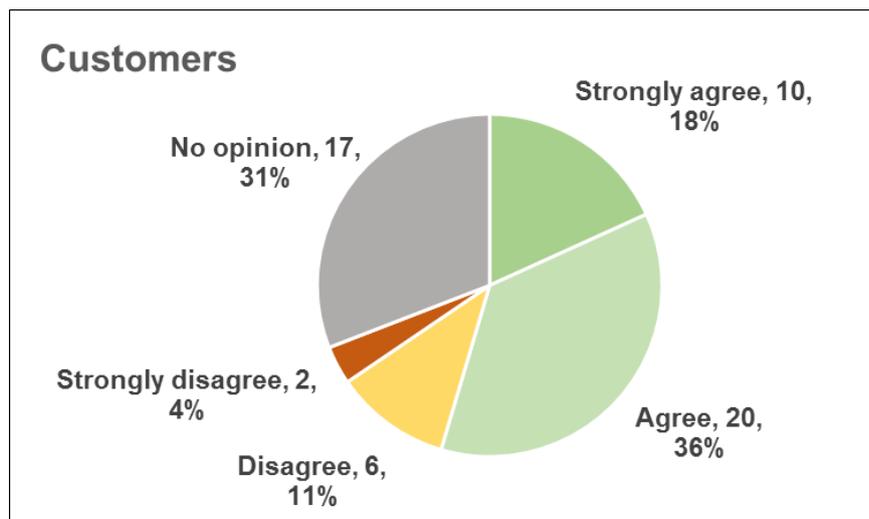
38% of responders agreed that the Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan, and a further 33% strongly agreed with it. Whilst 20% expressed no opinion, 7% disagreed and 2% strongly disagreed.

The responses to this question broken down into the four participant segments is set out below:

Category	Strongly agree	Agree	Disagree	Strongly disagree	No opinion	Total responses
Customers	10	20	6	2	17	55
Community groups	6	3	0	0	1	10
Councillors	5	5	2	0	3	15
Partner	18	16	0	0	3	37
<b>Total</b>	<b>39</b>	<b>44</b>	<b>8</b>	<b>2</b>	<b>24</b>	<b>117</b>

## Customers

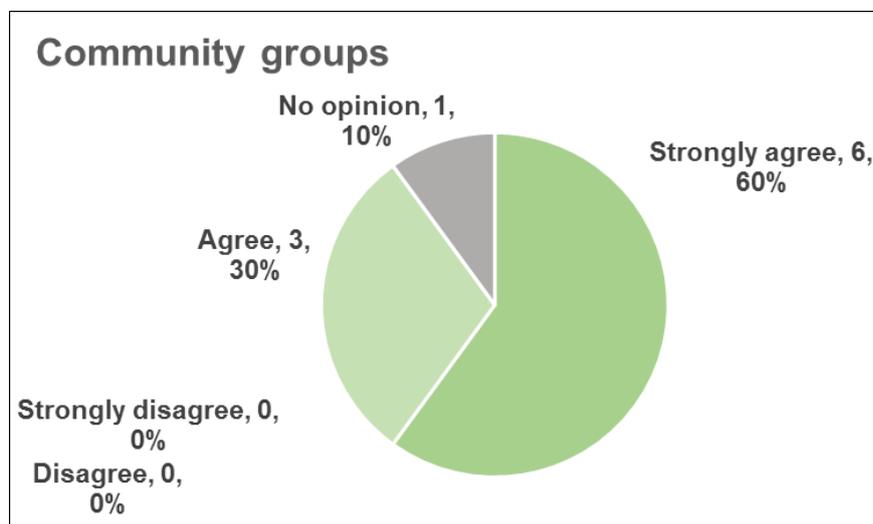
55 customers responded to this statement.



36% of our customers agreed that the Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan, and a further 18% strongly agreed, a total of 54%. 31% had no opinion, 11% disagreed and 4% strongly disagreed.

## Community Groups

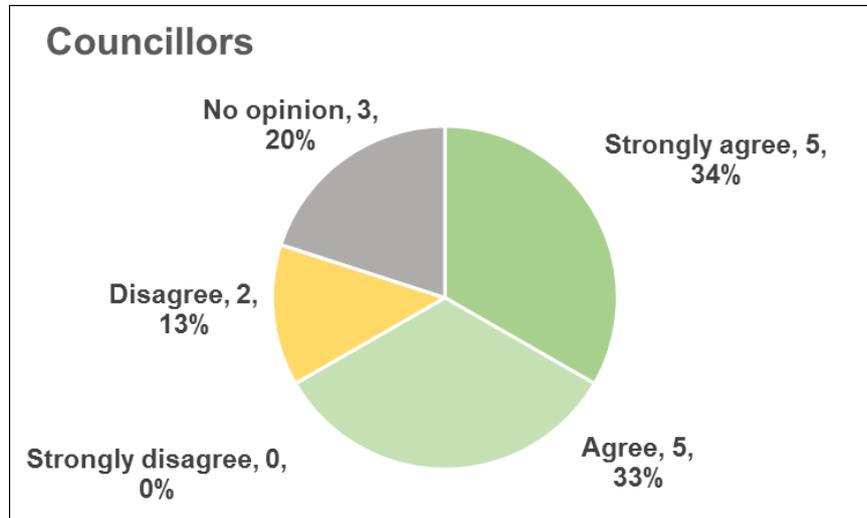
We received 10 responses to this statement from community groups.



No community groups disagreed or strongly disagreed that the Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan. However, 60% strongly agreed and 30% agreed that the WINEP programme should draw upon the information in the DWMP. 10% had no opinion.

## Councillors

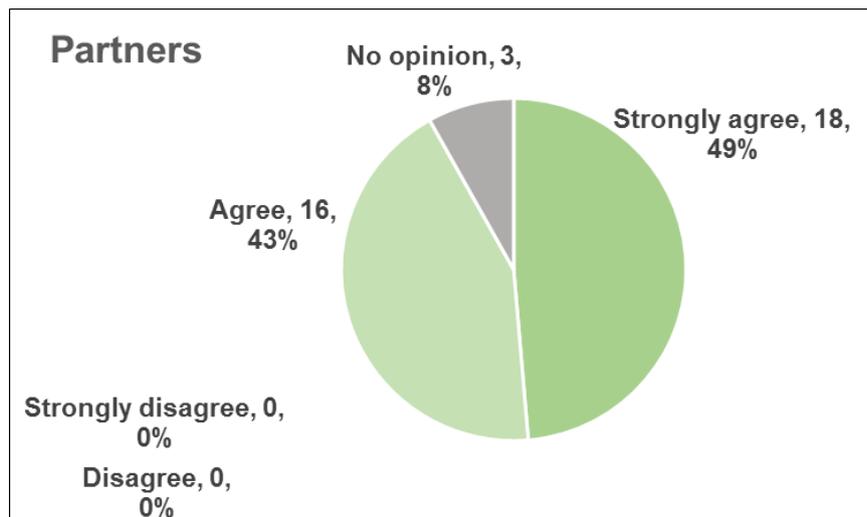
15 Councillors responded to this statement.



34% strongly agreed and 33% agreed that the Water Industry National Environment Programme (WINEP) should draw upon information in our DWMP and other plans such as the Water Resources Management Plan. Whilst no Councillors strongly disagreed, 13% disagreed and 20% had no opinion.

## Partners

37 partner organisations responded to this statement.



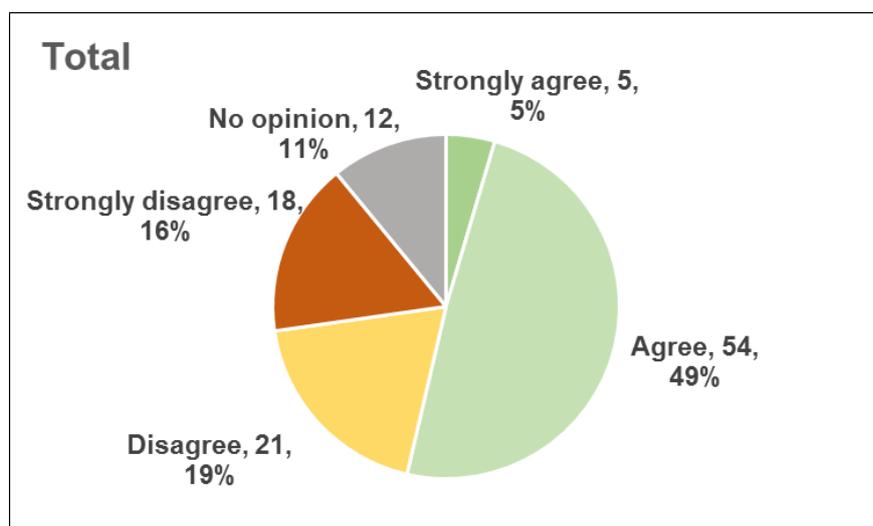
49% of partner organisations strongly agreed that the WINEP programme should draw upon the information in the DWMP and a further 43% agreed, a total of 92%. No partners disagreed or strongly disagreed whilst 8% offered no view.

*Statement 10: Overall, I support the approach set out in Southern Water’s first Drainage and Wastewater Management Plan*

We received a total of 110 responses to this statement.

*Note: there was no free text field for this statement so only the statistical analysis is available below.*

49% of responders agreed that they supported the approach we have set out in the draft DWMP and a further 5% strongly agreed, a total of 53%. However, a total of 34% did not support the approach with 19% disagreeing and 16% strongly disagreeing. 11% had no opinion.



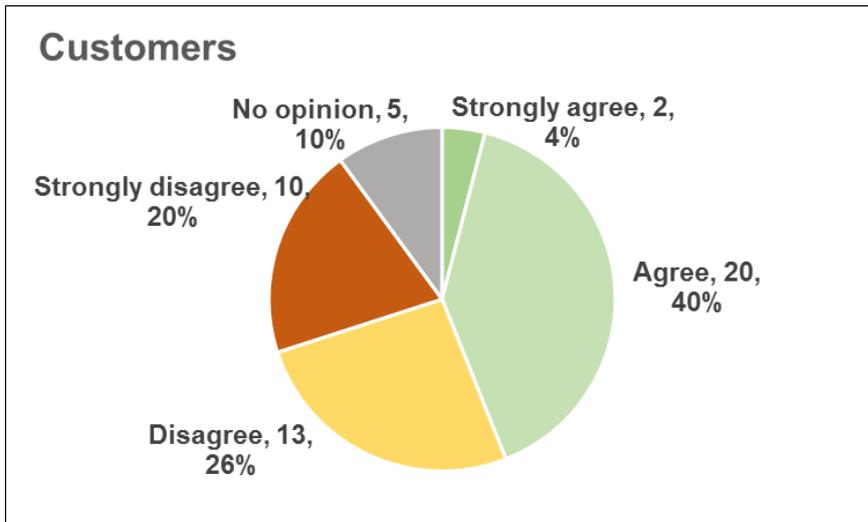
The responses to this question broken down into the four participant segments is set out below:

Category	Strongly agree	Agree	Disagree	Strongly disagree	No opinion	Total responses
Customers	2	20	13	10	5	50
Community groups	1	2	0	5	2	10
Councillors	0	7	3	3	1	14
Partner	2	25	5	0	4	36
<b>Total</b>	<b>5</b>	<b>54</b>	<b>21</b>	<b>18</b>	<b>12</b>	<b>110</b>

## Customers

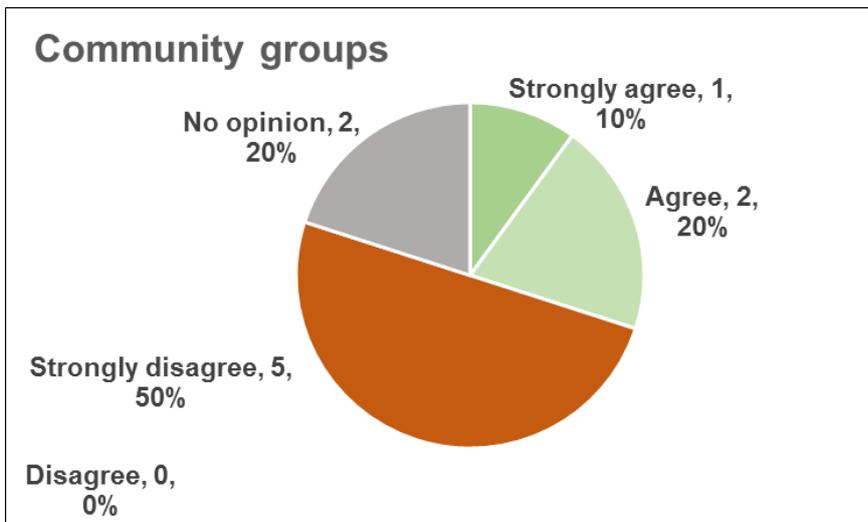
50 customers responded to this statement.

A total of 46% of our customers do not agree with the approach taken in our DWMP with 26% disagreeing and 20% strongly disagreeing. 44% said they support the approach made up of 40% in agreement and 4% strongly in agreement. 10% did not have an opinion.



## Community Groups

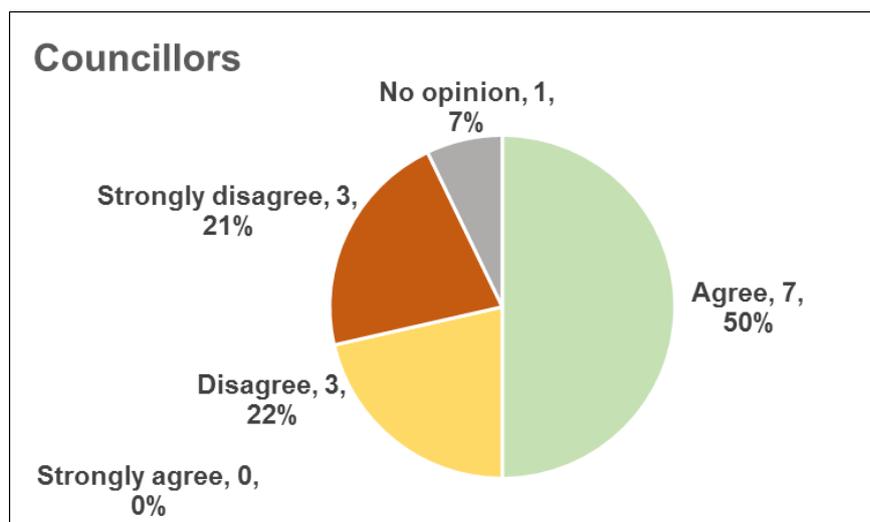
10 community groups responded to this statement.



Half, 50%, of the community groups strongly disagree with the approach to drainage and wastewater management set out in the DWMP. 20% offered no opinion whilst 10% strongly agreed with the approach and 20% agreed with it.

## Councillors

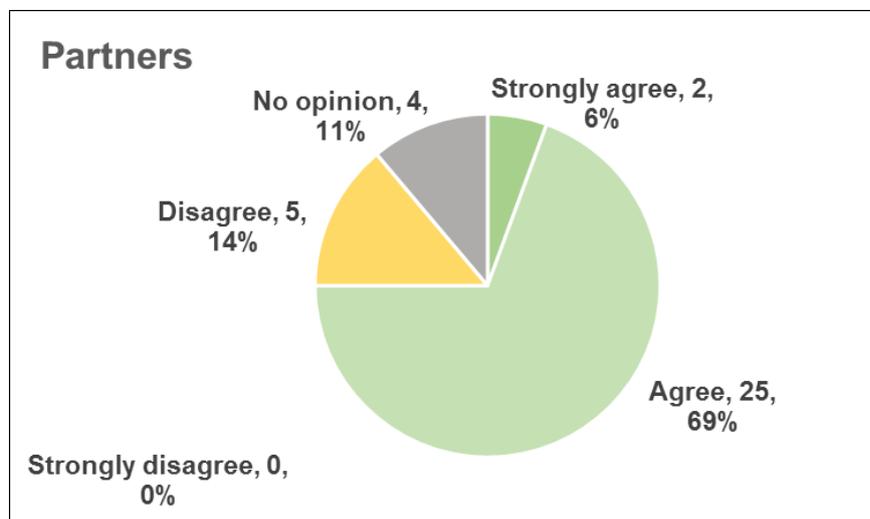
14 Councillors responded to this statement.



None of the Councillors strongly agreed with the approach to drainage and wastewater management set out in the DWMP although 50% agreed. 22% disagreed and 21% strongly disagreed, a total of 43%. 7% offered no opinion.

### Partners

36 partner organisations responded to this statement.



69% of partner organisations agreed with the approach to drainage and wastewater management set out in the DWMP and a further 6% strongly agreed, a total of 75%. Although none strongly disagreed with the approach, 14% disagreed and 11% provided no opinion.

## 6 Next steps

Significant and material issues raised during the public consultation have been entered into our [Register of Stakeholder Comments](#). This is an ongoing 'You said, we did' record of all the issues raised by stakeholders (our customers, communities and partner organisations) since work began on the DWMP, and our responses and actions.

The register will be published alongside the final DWMP. It ensures that issues and comments are fully taken into consideration as the DWMP is finalised prior to publication in 2023. Some of these issues are being directly addressed, others will be taken forward to be considered in the next cycle of the DWMP and others are being directed to relevant directorates within Southern Water for information and action.

**Southern Water**  
December 2022

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<sup>i</sup> The website (<https://www.southernwater.co.uk/dwmp>) is the online platform for our DWMP