Water Resources Management Plan 2024 Statement of Response

Annex 4: Feedback by members of the public and community groups

August 2023

Version 1

from Southern Water

This Annex presents an overview of the responses to each of the 21 questions in the questionnaire by those respondents who submitted responses via the consultation website. A total of 122 responses were received in this way.

Of the 122 questionnaire responses, 28 stated that they were responding on behalf of an organisation, whilst 91 of the responses were submitted by individuals. 3 respondents did not confirm either way. A list of the organisations responding by questionnaire is enclosed as part of the full list of respondents at annex 1.

62 of the respondents confirmed that they received water supply from Southern Water, with 51 stating that they did not, and the remaining 9 respondents not stating either way.

The responses themselves are summarised and responded to in more detail below. Changes made to our Revised Plan as a result of the feedback are described in section 4 of our main Statement of Response Report.

1.1. Consistency with the Regional Plan

Our Draft Plan explained the way we have worked together with other water companies in the WRSE group to ensure we have adopted a consistent approach in planning to safeguard customer water supplies into the future. As part of the questionnaire, we asked our customers and community groups if this was important for them.

1.1.1. Question 1: Do you agree that our WRMP should reflect the best value Regional Plan, so we are aligned with our neighbouring water companies?

Of the respondents to this question, approximately 52% believed that we should reflect the best value regional plan, whilst 40% of respondents disagreed (Figure 4.1, Table 4.1).

Table 4.1 Summary of feedback on Question 1.

	Key themes in responses in response to Question 1
Yes (51.6%)	• Support for water companies working together to share resources and plan to meet future needs on a regional basis • Scale of future needs means working on a regional basis, including on sharing water through transfers is essential • Support for seeking to achieve regional consistency in company performance in drought standards, water efficiency and leakage • Support for regional collaboration on water resources, but comments that there also needs to be a focus on other issues including sewage discharges and better performance for customers (secure supplies)
No (39.3%)	• Shouldn't be reliant on other companies to provides supplies to your own customers, it is for Southern Water to ensure its own supplies are resilient • Not clear what this collaboration means for customers – i.e. is it more expensive than developing your own resources • Opposition to lack of action on leakage, poor performance on sewage discharges, poor customer service (secure supplies) and financial focus on shareholders rather than customers • Opposition to water recycling into Havant Thicket reservoir
Don't know or other comment (1.6%)	• Opposition to sewage discharges, and perceived benefiting shareholders not customers or the environment

	Key themes in responses in response to Question 1
Blank or no comment (7.4%)	

Summary response

Our detailed responses to the comments made in Question 1 are set out below. We continue to work with WRSE in developing an overall Regional Plan which delivers best value for customers in the South East. This includes significant work with the other water companies to develop shared water resources and common approaches to drought, leakage and water efficiency measures. Our revised Draft WRMP24 will continue to be aligned with the Regional Plan.

Changes to our plan as a result of the feedback on Question 1

There is no change to our revised plan based on this feedback as there has been no change to our best value and regional collaborative approach.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Agree as a sensible or obvious course of action. Working with other companies and WRSE is a good thing and necessary. Companies cannot solve the problems on their own. Other comments include that to operate efficiently at this scale you need to co-ordinate at a higher level than just the region you supply. Also, future challenges (including climate change) and the need for lobbying and co-ordination of demand management measures will require joint working.	WRMP008 WRMP009, WRMP019, WRMP027, WRMP031 WRMP032, WRMP036, WRMP042, WRMP047, WRMP049 WRMP050 WRMP051 WRMP052, WRMP061 WRMP063 WRMP064, WRMP066 WRMP067, WRMP068 WRMP077, WRMP087 WRMP092, WRMP101 WRMP107, WRMP116 WRMP117, WRMP118 WRMP119	The support for the approach in the draft WRMP is welcomed.
Aligning water company plans allows for more efficient use of resources, potentially lower price, greater resilience and potentially environmental and societal benefits. Comments on what Best value means. Value should not be solely measured in financial terms - all benefits (including environmental) should be looked at in the round - not necessarily least cost.	WRMP078 WRMP079 WRMP103 WRMP108 WRMP113	The draft WRMP explained the Best Value planning approach and how through best value planning a wider range of factors than just cost are used as the basis for decision making, including environmental and other factors. The selected best value plan is the one that is considered to perform best against the range of objectives set for the plan.
Support but concerns about service to customers and shareholders profits.	WRMP058 WRMP070 WRMP091 WRMP114	We are continuing to invest in new infrastructure and our networks to reduce leaks. This is a key component of maintaining our assets for the current and future generations and just like the other water and wastewater assets that we maintain the costs for doing so forms part of customer bills. If the company fails its targets for example on leakage set by Ofwat then the penalty is paid by our shareholders. Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017.

Themes and issues raised in representations	Defra No.	Company consideration and response
Agree subject to a balance being struck so that all parts of the region experience the same service standards, same environmental standards and costs.	WRMP012 WRMP071	The approach being adopted through our collaborative work with other companies is to achieve shared standards and targets across the region, but with some flexibility at company level that recognises different companies have different starting points. The approach is explained in detail in the draft WRMP. As an example, on leakage, Southern Water has achieved significant leakage reduction already when compared to other companies and so its targets seek to build on what has already been achieved.
It feels important that we align to ensure all companies are working to the same outputs and requirements (everyone clear on their part to play). However, if we need to go out of step with other companies to protect our own customers interests then this may be a good reason to misalign as a last resort.	WRMP022	
Opposition to planned water recycling.	WRMP040 WRMP094	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. We have conducted an advanced analysis to quantify the public health risk associated with the proposed water recycling system. This analysis covers both acute health impacts associated with pathogen exposure, and chronic health impacts associated with chemical exposure (e.g., carcinogens). The findings of this analysis show extremely low health risk posed by the recycled water (benchmarked against WHO standards), even in simulated extreme treatment failure scenarios. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the

Themes and issues raised in representations	Defra No.	Company consideration and response
		abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife.
Support, but comment that plan for next 200 years or more..... 50 years is just too short a period..	WRMP041	The long term population, climate change and environmental forecasts that we use as the basis for the plan have increased uncertainty within them the further ahead they look. A 50 year plan is the limit of what we currently forecast, but this may change for future plans.
Support for investment in improvements in water supply system, but concerns about lack of details on timelines and funding.	WRMP046	The draft WRMP sets out the planned demand management and new resources developments for our water supply areas, including the timescales for delivering them. The costs of the proposals in the plan are set out in terms of overall costs and potential impacts on customer bills.
Agree there should be alignment with neighbouring water companies, but the regional plan and WRMP should make it clearer how the use of scenarios has resulted in the emerging proposals. Population growth scenarios being the first decision point (2030), environmental improvement and climate change following (2035) appears counterintuitive, given that the environment improvements and climate change scenarios have a far greater impact upon the extra water needed in 2075.	WRMP065	The timing for the decision points in the regional plan reflects the point where there will be sufficient confidence in the data and information to enable a decision to be made on the most appropriate adaptive plan pathway to follow. At this point, all adaptive plan pathways are considered equally likely, and the plan is capable of adapting to any of the potential futures we have planned for. When future levels of population growth are confirmed, and when planned investigations of abstractions and environmental improvements are completed, decisions will be taken on the adaptive plan branches to follow. This will be reflected in future regional plans and WRMPs, which are prepared on a five year plan-making cycle.
Yes, in theory, but GARD strongly disagrees with WRSE's regional plan.	WRMP111	This comment is noted.
Comments against pollution of rivers	WRMP114	Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. Digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. Improving training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect.
Comments from respondents who disagreed.		
Comments about what best value means and how it is measured. Comments on impact on the environment. Best value should put clean water & environmental protection ahead of profit. Good value is also good management of the natural environment. Costs should not be the main factor for running a water company. Health and environment should be considered. Plan should be the one best delivering on the objectives, not best on cost benefit basis. Should create a clean future for our children, not simply be best value	WRMP005 WRMP026 WRMP085 WRMP086 WRMP097 WRM099 WRMP102 WRMP106 WRMP110 WRMP115 WRMP028 WRMP073	The draft WRMP technical documentation provided a clear explanation of the Best Value planning approach, and this explanation was provided in summary form in the consultation documentation. Through best value planning a wider range of factors than just cost are used as the basis for decision making, including environmental and other factors. The selected best value plan is the one that is considered to perform best against the range of objectives set for the plan.
Southern Water should be leading the way in water provision not aligning themselves with other authorities who may not be providing as efficient a service. You should aim to be 'best practice', not best value. Not convinced that doing the same as your neighbours is necessarily good enough. Alignment does not guarantee best service. Alignment with other companies should only be if their policies are reflecting the same priorities.	WRMP005 WRMP010 WRMP013 WRMP011 WRMP109 WRMP020 WRMP030 WRMP095 WRMP115	Southern Water is leading the way in its best value planning - it was the first water company to adopt this approach. It works closely with other companies to develop the regional plan. Southern Water is striving to deliver best practice in its water resources delivery and customer service. Through the regional plan the water companies are working to achieve high standards of water efficiency and leakage reduction, albeit with variations across the region to reflect the different challenges being faced by different companies. Southern Water has already achieved high levels of leakage reduction, for example, and is working hard to achieve more.
Should develop a sustainable WRMP without relying on supply from neighbouring suppliers.	WRMP003 WRMP090	Water resources are already shared between companies and this is an essential part of providing resilient supplies to customers. There are different levels of available resources within the region and

Themes and issues raised in representations	Defra No.	Company consideration and response
		country as a whole, due to geological conditions and weather patterns. The scale of the challenges being faced across the region mean that increased sharing of resources needs to be a core part of the water resources solution.
Agree to cutting leaks, demand management measures and support for improving service to customers. Water should be used efficiently before increasingly supplies.	WRMP003 WRMP033 WRMP034 WRMP054 WRMP056 WRMP010, WRMP013, WRMP060 WRMP072 WRMP086 WRMP089 WRMP100	The support for the significant demand management measures in our plan is welcomed, and the plan commits to achieving significant reductions in water use and leakage alongside new resources development.
Opposition to recycling wastewater for drinking water. Does not want recycled water due to risk from medication and disease which cannot be removed. Not safe. Opposition to recycling wastewater into Havant Thicket reservoir.	WRMP004, WRMP018 WRMP020 WRMP024 WRMP029 WRMP033 WRMP039 WRMP043 WRMP059 WRMP060 WRMP072 WRMP076 WRMP081 WRMP088 WRMP089	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. The proposed full advanced treatment process is an internationally proven robust multi-barrier treatment process capable of removing a broad spectrum of contaminants to produce a high purity recycled water. We have undertaken a pilot trial using the proposed treatment process at Budds Farm WTW; as part of this trial, an extensive sampling campaign was undertaken to measure concentrations of a large suite of pollutants for the crude sewage, WTW final effluent, and at each stage of the water recycling treatment process. Our pilot plant sampling data has successfully demonstrated the robustness and safety of this process for our specific system.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We have conducted an advanced statistical analysis of our pilot plan data to quantify the public health risk associated with the proposed water recycling system. This covers both acute health impacts associated with pathogen exposure, and chronic health impacts associated with chemical exposure (e.g., carcinogens). The findings of this analysis show extremely low health risk posed by the recycled water (benchmarked against WHO standards), even in simulated extreme treatment failure scenarios. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Should build desalination plants.	WRMP004	The WRMP includes a number of desalination plant proposals, particularly over the longer term.
Opposition to putting sewage into the river and seas	WRMP013 WRMP034 WRMP062 WRMP082	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against

Themes and issues raised in representations	Defra No.	Company consideration and response
		Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. Digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. Improving training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect
Comments opposed to issuing dividends to shareholders	WRMP013 WRMP034 WRMP097	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017.
Every area in the country has different needs and resources. The weather in the South East can be exceptionally dry but in the winter we can have really cold days, then the next is hot causing cracked pipes.	WRMP015	The levels of future resources that the plan identifies as being required in the future takes account of seasonal weather fluctuations and the challenges of climate change.
Qualified support or other comments - as not clear or response depends on other factors, including what solutions are selected. Also, a comment that question is unclear or misleading	WRMP057 WRMP083 WRMP084	It is recognised that there may be support for the overall plan, but this is qualified by concerns or comments on individual options. The question is considered to be clear, and relating to the overall approach to the plan. For future consultations we will carefully

Themes and issues raised in representations	Defra No.	Company consideration and response
		consider the clarity of the questions we pose.
Disagree - some healthy competition between companies should bring innovation to resolving the alleged water shortfall.	WRMP112	There is considerable innovation in the water sector, and extensive joint working between water companies and regions to ensure that all companies are able to use new and innovative approaches to demand management and water resources developments.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Opposition to Southern Water pumping sewage into the sea, and benefiting shareholders not customers or the environment	WRMP025. WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach

Themes and issues raised in representations	Defra No.	Company consideration and response
		99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. Digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017.

1.2. Increasing resilience to droughts

We are aiming to improve the resilience of our supply network so that we maintain supplies to our customers without relying on drought measures unless we are faced with a severe drought i.e. a 1-in-500 year drought event. Questions 2 and 3 in questionnaire addressed this point.

1.1.2. Question 2: To protect the environment, we currently have a lower level of service in our Central area, covering West Sussex and Brighton and Hove, compared to our target. This means up to 2027 there is an increased likelihood of needing to impose restrictions on water use. We have set out our plan to address this gap. Do you have any comments or concerns about this level of service in our Central area and our plan to address it?

Of the respondents to this question, approximately 50% had comments or concerns, while 36% did not (Figure 4.2, Table 4.2).

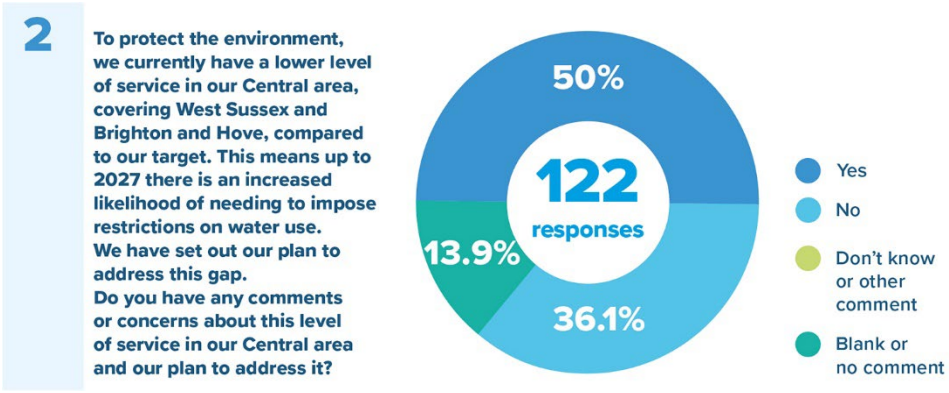

Figure 4.1 Feedback on Question 2.

Table 4.2 Summary of feedback on Question 2.

	Key themes in responses to Question 2
Comments or concerns (50%)	• There should be more focus on leakage reduction and demand management to safeguard supplies • Southern Water should identify and develop additional storage (reservoirs) so that supplies are available in a drought • Support for the necessary environmental protection that leads to drought restrictions – it is important to safeguard the environment, especially chalk streams • Question why customers should have to have a lower level of service – Southern Water needs to address this so that customer supplies are protected • Concerned that customers don't really have a choice, and that if supplies are restricted they should be compensated • Concerns that levels of housebuilding are worsening the situation • Concerns about water neutrality restrictions in Sussex North
No (36.1%)	• Concern that Southern Water should develop more local solutions in Sussex, rather than needing lower levels of service or be reliant on importing water from elsewhere • Short term restrictions are a necessary part of water resources planning • Opposition to sewage discharges, and perceived benefiting shareholders not customers or the environment • Opposition to water recycling into Havant Thicket reservoir
Blank or no comment (13.9%)	

Summary response to the comments on Question 2

The table below contains our detailed responses to the comments made in Question 2.

Our plan includes investment in demand management and water efficiency measures, as well as targeted leakage reduction. We have also developed contingency plans for drought events, and monitor environmental conditions to ensure that actions are taken to maximize available water resources. Ultimately, water restrictions will continue be necessary to protect customer supplies and we have assumed they would be available for us to use throughout the planning period.

We are investing significantly in new resource developments, including additional storage and new resource options in the central area to make our supplies more resilient and improve our level of service. The proposals in the plan balance this need for more resources with temporary restrictions during a drought

Changes to our plan as a result of the feedback on Question 2

We describe the levels of service that we aim to provide in section 4.5 of our revised dWRMP24. This considers any changes to levels of services as a result of changes to delivery date for Littlehampton water recycling and removal of Sussex Coast Desalination options.

We will continue to assume that temporary use bans, non essential use bans and drought permits and orders are available as part of our strategy. Our revised draft plan will include an additional mitigation plan to try and reduce our reliance on drought measures due to the delays in delivery of our Littlehampton Recycling Scheme to 2030 and it may be that we will need to extend the lower level of service up until this date.

As part of the measures, we are undertaking to improve resilience in the Central area, we have agreed to extend an existing bulk import from SES Water. The bulk supply was set up as a temporary measure up to the end of AMP7. The current supply is around 1.3Ml/d. This has now been extended up to 2031 to provide up to 4Ml/d. This option is part of our best value Revised Plan (Section 9).

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Agree with the proposals in the plan. Support for summer restrictions. Would be good if restrictions didn't need to be imposed, but accept if they are necessary. Having restrictions highlights the need to conserve water.	WRMP008 WRMP012 WRMP061 WRMP074	The support for the proposals in the draft WRMP is welcomed.
Support for greater demand management and water efficiency measures for households, and also targeting business users using high volumes. Comments on water scarcity. Comments on pricing of water.	WRMP032 WRMP041 WRMP048 WRMP084 WRMP068 WRMP085 WRMP087 WRMP098 WRMP101 WRMP114 WRMP115	The draft WRMP recognises the need for investment in demand management and water efficiency measures, to reduce overall demand for water. This plays a significant contribution towards meeting our future water resources needs. Support for this is welcomed.
Southern Water need to improve their performance in managing leaks and waste. This would reduce the requirement for resources significantly.	WRMP010 WRMP013 WRMP070 WRMP095 WRMP102 WRMP032 WRMP048 WRMP084 WRMP109 WRMP114 WRMP115	The draft WRMP highlights the significant planned investment in leakage reduction, and the contribution towards meeting our future water resources needs that this will make. Support for this is welcomed. The proposals in the draft WRMP seek to achieve targeted further improvements in leakage reduction, building on what has already been achieved, meeting the Government's targets.
Concerns that there is insufficient contingency planning for droughts, adversely affecting customers. Imposing restrictions on certain customers, but still charging them the same costs as those who are not affected is not treating customers fairly.	WRMP025 WRMP031 WRMP050 WRMP056 WRMP060 WRMP071 WRMP082	Southern Water has detailed contingency plans for drought events, and prepares a Drought Plan on a three yearly plan making cycle to set out its proposals. There is extensive monitoring of environmental conditions to ensure that actions are taken ahead of and in the lead up to a drought to maximise available water resources and to increase demand management activities. Ultimately, water restrictions within a drought are necessary as part of the range of activities that the Company can use to ensure customer supplies are protected.
There should be more investment in reservoirs and storage, and to develop more resources to make supplies more resilient.	WRMP014 WRMP024 WRMP027 WRMP043 WRMP059 WRMP113	Southern Water is investing significantly in new resource developments, including additional storage and new resource options to make supplies more resilient. The proposals in the plan balance this need for more resources with temporary restrictions during a drought.

Themes and issues raised in representations	Defra No.	Company consideration and response
Opposition to water recycling into Havant Thicket due to environmental impacts and other concerns. Support for other options instead, including additional storage.	WRMP028 WRMP039 WRMP059 WRMP094 WRMP097 WRMP099 WRMP106	We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Comments on environmental impacts associated with building desalination plants. Comments on the lack of detail of environmental benefits associated with abstraction reductions.	WRMP019	The potential environmental impacts associated with desalination plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced. On abstraction reductions, there is a period of further investigation and assessment planned over the period to 2030 to assess and quantify the wider environmental benefits associated with planned and potential licence changes. This will help inform decisions to be made in subsequent WRMPs.
Comments and concerns about impact of planned housebuilding on available water supplies and need to ensure development takes account of lack of available water resources, or is timed to follow new resource development. Concerns about environmental impact of development.	WRMP011 WRMP043 WRMP072 WRMP077 WRMP099	Local planning authorities are already seeking high levels of water efficiency measures in new developments, and the restrictions relating to water resources in Sussex (Water Neutrality) are a significant constraint on planned new residential developments. Southern Water works closely with the planning authorities and development industry to ensure that new developments can be supplied with water, and this can include bringing forward plans for new resource developments to serve residential and other development in an area.
If we have affordability / cost of living concerns to address in the near term would be willing to have a hosepipe ban more frequently to keep costs down. Clearly in the longer term we need to reduce this risk and cost implications.	WRMP022	The recognition of the potential cost to customers of the significant planned investment is welcomed. The draft WRMP seeks an appropriate balance between cost, securing resources for customers and the protection of the environment.
Opposition to the Candover Drought scheme due to impacts on the environment and on fishing.	WRMP044	The Candover Drought Order scheme is a short term and temporary measure necessary in Hampshire pending the delivery of longer term permanent new water resources developments.

Themes and issues raised in representations	Defra No.	Company consideration and response
		Planning applications for the Drought Order scheme have been submitted and are awaiting determination by the planning authorities. In a drought, a Drought Order would need to be granted for the scheme to operate. Both the planning and Drought order process will scrutinise in detail the potential environmental effects of the scheme, and Southern Water's plans to mitigate and compensate for them.
Concerns about sewage discharges into the sea and rivers. Comments about lack of trust relating to company performance.	WRMP030 WRMP062 WRMP066 WRMP106	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows.

Themes and issues raised in representations	Defra No.	Company consideration and response
		Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017.
Support for increased ground and surface water recharge through changes to land management to increase rainwater infiltration, such as greater use of SuDS, increasing tree and other vegetation cover, restoring streams, rivers, ponds, ditches, fens, bogs and marshes. Increased abstraction during drought conditions as suggested is not sustainable.	WRMP068	Southern Water is committed to working with its existing catchment partners, other environmental organisations and landowners to bring forward catchment management schemes and nature based solutions. These will be funded through a variety of sources, not just the WRMP and Business Plan process.
Comment on need to develop local solutions in Hampshire, not rely on Portsmouth Water. Not all options have been explored.	WRMP079 WRMP088 WRMP094	The draft WRMP includes a range of water resources solutions, including sharing of resources between water companies. The ability to store and share resources forms an essential part of the plan given the scale of the challenge that is being faced.

Themes and issues raised in representations	Defra No.	Company consideration and response
Support the notion that all areas should benefit from a similar level of service in terms of resilience. Without this, development in the area could be constrained which may put additional pressure on neighbouring areas.	WRMP103	The regional planning process is seeking to achieve common levels of resilience across the region, which will benefit all customers consistently.
Concerns about the Water Neutrality issue having a major impact on planning authorities in the Sussex North Water Resource Zone. Issue should receive greater recognition from Southern Water in this plan – Southern Water should be doing all they can in the immediate-term to help address the issues facing the affected local authorities. Welcome scheduling of the Littlehampton recycling plan and the importing of water from nearby suppliers early in the plan (2025-2035). This will contribute to addressing this issue which is delaying Local Plans, restricting economic development and holding up much needed affordable housing in the local authority areas supplied by the SNWRZ.	WRMP117	Southern Water works closely with the local planning authorities and welcomes them already seeking high levels of water efficiency measures in new developments. It recognises that the restrictions relating to water resources in Sussex (Water Neutrality) are a significant constraint on planned new residential developments. Southern Water will continue to work with the planning authorities and development industry on measures both in the short and longer term to ensure that new developments can be supplied with water, and to bring forward plans for new resource developments to serve residential and other development in the area.
Comments that question is not clear	WRMP005	Southern Water will review the wording of questions carefully in advance of future consultations.
Comments from respondents who disagreed.		
Support for the approach, with comments on the need to engage with and support customers. Reasonable restrictions in times of drought are expected. Also comment on need for contingency planning and regular monitoring.	WRMP009 WRMP064 WRMP083 WRMP081 WRMP089 WRMP116	The support for the proposals in the draft WRMP is welcomed. Southern Water undertakes extensive contingency planning and monitoring ahead of, during and post drought events.
Concerned that there is insufficient emphasis on encouraging domestic and commercial users to reduce their water usage, but accept that there will be occasions when drought conditions arise and drought orders need to be imposed. Does not accept Southern Water's approach for addressing future water resource shortages - not the optimum solution in terms of sustainability.	WRMP023	The draft WRMP includes significant demand management measures that are proposed to be implemented, to build on the leakage reduction and household water use reductions that have already been achieved. In addition, the Drought plan sets out additional measures that would be taken in a drought, including enhanced leakage reduction, publicity and water efficiency promotion. The proposals are considered to represent the most appropriate balance between new resources development and demand management measures.

Themes and issues raised in representations	Defra No.	Company consideration and response
Support for local solutions. Opposition to recycling wastewater into Havant Thicket.	WRMP029	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Every effort should be made NOW to do our best to lessen the problem as far as possible.	WRMP033	Southern Water has existing programmes for demand management measures and new resources development in the period to 2025. Beyond 2025 the draft WRMP sets out the significant additional investment that is proposed.
Only concern is that new reservoirs are needed (possibly even underground, to prevent high evaporation levels due to the change in climate conditions and the predicted increase in average temperatures).	WRMP040	The proposals in the draft WRMP take account of the impacts of climate change, both in terms of increased water availability (more rainfall) and impacts on existing and planned supplies from increased temperatures and more frequent or more severe heat

Themes and issues raised in representations	Defra No.	Company consideration and response
		and drought. Storage forms a core part of the proposals in the plan, combined with water transfers between companies within the south east region.
Comments on need for recognition that housebuilding places pressure on available water resources.	WRMP046	This is recognised within the draft WRMP and Southern Water works closely with local planning authorities to ensure that its proposals take account of future planned levels of housebuilding.
Comments on problems currently maintaining supplies to customers in Hampshire.	WRMP054	There have been a number of recent interruptions to supply in Hampshire, for which Southern Water has apologised and compensated customers. The proposals in the Draft WRMP will make supplies more resilient in the future.
Comments that this issue is not related to the respondent's interests, do not live or operate in this area, or no comments to make	WRMP018 WRMP047 WRMP049 WRMP065 WRMP076 WRMP078 WRMP090 WRMP092 WRMP110 WRMP111 WRMP119	Noted.
Need to sort out leaks and promote water efficiency first.	WRMP091	The draft WRMP has significant planned investment in leakage reduction and demand management measures. To meet the scale of challenges in the future there is a need new resources development as well as the demand management measures.
Planning to address any supply gap (in the longer term) should not be at the expense of the wider environment, as by the construction of land-hungry new reservoirs	WRMP116	The environmental impacts of new developments are considered as part of the preparation of the draft WRMP. Future applications for planning and other consents will provide detailed environmental impact assessments and ensure that necessary environmental mitigation is secured.
Please stop pumping sewage into the sea. Question considered to be leading.	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-

Themes and issues raised in representations	Defra No.	Company consideration and response
		agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our

Themes and issues raised in representations	Defra No.	Company consideration and response
		customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017.

1.1.3. Question 3: We propose to stop using drought orders and permits that allow us to continue abstracting from the environment after 2040, unless we experience a severe drought. This means we'll need to develop new water supplies to replace them. Do you agree with this approach and the timescale we are proposing to deliver it?

Of the respondents to this question, approximately 42% agreed, whilst 47% disagreed (Figure 4.3, Table 4.3).

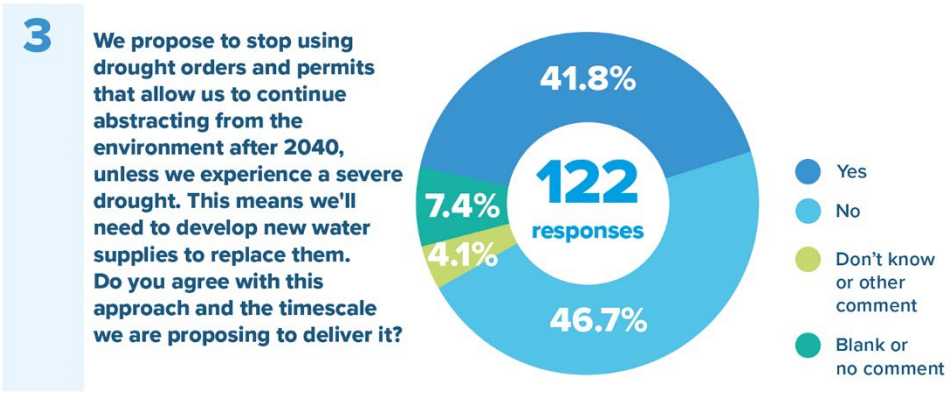

Figure 4.2 Feedback on Question 3.

Table 4.3 Summary of feedback on Question 3.

	Key themes in responses to Question 3
Yes (41.8%)	• Support for removing the use of drought permits and orders by 2040 • Support, but requests for this to be delivered earlier, especially for sensitive environments such as chalk streams • Support, but comments identifying need for more water storage, including reservoirs and also smaller storage options such as farm reservoirs • Support, especially stopping the use of drought measures on the River Itchen earlier, by 2030 • Support, but concern at the scale of investment and new resource development required to achieve it, and the cost, delivery risks and environmental impacts associated with them
No (46.7%)	• Southern Water should fix leaks and achieve water efficiency faster, to enable drought options to not be needed sooner • Concerns about the financial cost to customers of achieving this • Concerns that the environmental impacts of new resource options are too great, including carbon • Concerns that the environmental benefits of the drought options no longer being available do not justify the high financial costs of alternative resources being developed. • Drought options on sensitive environments, e.g. chalk streams, should be ended sooner. • Opposition to sewage discharges • Opposition to water recycling into Havant Thicket reservoir
Don't know or other comment (4.1%)	• Southern Water should plan to deliver new resources as soon as possible, and not wait until 2040 • The needs of the environmental should be met first and then solutions found to meet the needs of water users

	Key themes in responses to Question 3
Blank or no comment (7.4%)	

Summary response to the comments on Question 3

The table below contains our detailed responses to the comments made in Question 3. We still aim to build a resilient supply system by 2040 which will mean that we are able to maintain uninterrupted supply to our customers without relying on drought measures to increase supply, unless we are faced with a severe drought of 1-in-500 year severity.

Changes to our plan as a result of the feedback on Question 3

We have not made any changes to the target date for terminating the use of drought measures to increase the amount of water we take from the environment except in a severe drought because of the consultation responses. However, as we describe in our revised draft WRMP, we have made changes as a result of revised scheme delivery dates.

As part of our sensitivity testing, we have tested different timelines for achieving this level of resilience to see their impact on our preferred strategy. We repeated this testing for our revised draft plan to ensure that it continues to represent best value for our customers

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Support for the planned cessation of use of drought orders. Recognise the investment and delivery of demand management and new resources schemes to achieve this. Support, and faster would be better but there are risks around delivery. Could some schemes be accelerated to reduce delivery risks.	WRMP041 WRMP046 WRMP047 WRMP064 WRMP066 WRMP076 WRMP077 WRMP118 WRMP119 WRMP009 WRMP031 WRMP117	The support for the proposals in the draft WRMP is welcomed. The timetable for achieving drought resilience is balanced with the need to achieve significant demand management measures and new scheme delivery to facilitate this. Environmental abstraction reductions have been prioritised by Southern Water in discussions with the Environment Agency.
Support in part but concern that Chalk Streams should not be abstracted from in a drought due to the environmental impact. Comments that new supplies need to be prioritised faster, and/or that abstractions should stop before 2040.	WRMP003 WRMP004 WRMP012 WRMP037 WRMP046 WRMP047 WRMP049 WRMP050 WRMP052 WRMP083 WRMP116	
Comment that housebuilders should fund new water resources developments under s106 agreements.	WRMP011	Where new housebuilding or other developments leads to a need for new water resources sooner than otherwise planned there can be provision to contribute towards additional costs to bring forward the provision.
Opposition to water recycling in Havant Thicket.	WRMP029 WRMP081 WRMP087 WRMP092 WRMP098	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow

Themes and issues raised in representations	Defra No.	Company consideration and response
		us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Support for reservoirs to store available water, including smaller reservoirs linked to rivers and streams capturing heavy rainfall as a source. Comments also that need to consider desalination and could learn from other countries and new technologies.	WRMP029 WRMP031 WRMP032 WRMP033 WRMP067 WRMP071 WRMP081	The draft WRMP includes a range of water resource options to meet future needs, including storage, transfers, desalination, water recycling and other option types. Southern Water's investigation of options includes learning from experience in other countries and from new technologies.
With regards to the River Itchen however, we understand that drought orders will no longer be permitted by 2030. In no case should Southern Water apply to reduce the minimum acceptable levels in the Itchen and Test.	WRMP046 WRMP049	The revised delivery date for HWTWRP necessitates the need for the drought permit and drought orders in the Western area to continue to be available until 2034-35. Early testing has shown that without the availability of drought permit or drought order options, we cannot maintain a supply-demand balance when in drought. We do understand concerns and continue to work with the EA and stakeholders to both secure our supply obligations in an appropriate way and ensure that if and when needed, our drought permits or drought orders are also appropriate.
Subject to the environmental costs not outweighing the benefits and also subject to costs to the consumer, improved resilience that reduces the need to use drought orders and permits is desirable. We cannot continue to	WRMP100 WRMP103	The draft WRMP meets the Government's target for achieving higher levels of drought resilience by 2040. The options necessary to achieve this have been fully considered through the WRMP Options Appraisal and the potential environmental effects and mitigation

Themes and issues raised in representations	Defra No.	Company consideration and response
extract water regardless of the long term environmental impact.		measures taken into account.
Concern about delivery of this given difficulties maintaining supplies to customers	WRMP114	The scale of the future challenge being faced is significant but Southern Water is confident in its ability to deliver the necessary demand management, leakage reduction and new scheme development.
Comments from respondents who disagreed.		
Should be achieved before 2040. Plans are too little too late. Investment should be prioritised earlier. Protection needed earlier for sensitive environments, including chalk streams in Hampshire (2030 is the target)	WRMP005 WRMP010 WRMP014 WRMP020 WRMP026 WRMP044 WRMP056 WRMP058 WRMP065 WRMP021 WRMP102 WRMP110 WRMP079 WRMP085 WRMP088 WRMP106 WRMP117 WRMP113	The timetable for achieving drought resilience is balanced with the need to achieve significant demand management measures and new scheme delivery to facilitate this. Environmental abstraction reductions have been prioritised by Southern Water in discussions with the Environment Agency.
Need to focus on fixing leaks instead	WRMP018 WRMP055 WRMP095 WRMP078 WRMP085 WRMP112	The draft WRMP sets out Southern Water's ambitious plans to invest significantly in leakage reduction, building on the reductions achieved to date. This will be implemented alongside wider demand management measures and new resources development.
Need for demand management to be prioritised - water meters and tariffs on high water users. Temporary Use Bans (TUBs) which restrict certain household activities such as using a hosepipe or sprinkler to wash your car or water your garden is a good idea.	WRMP008 WRMP068 WRMP078 WRMP085 WRMP099 WRMP112 WRMP115 WRMP023	The draft WRMP includes significant demand management measures that are proposed to be implemented, to build on the household water use reductions that have already been achieved. In addition, the Drought Plan sets out additional measures that would be taken in a drought, including enhanced leakage reduction, publicity and water efficiency promotion. The proposals are considered to represent the most appropriate balance between new resources development and demand management measures.
Comments that the answer is not clear cut, and that retaining some flexibility is important. Cost of replacement water resources is significant and has environmental impacts. Would more restrictions be accepted if it meant lower bills and/or the need for fewer environmentally	WRMP019 WRMP022	The timetable for achieving drought resilience is balanced with the need to achieve significant demand management measures and new scheme delivery to facilitate this. The draft WRMP and regional plan set out scenario and sensitivity testing around this timing, and

Themes and issues raised in representations	Defra No.	Company consideration and response
damaging solutions. Need for balance and not sure if the proposals go too far.		the approach set out in the plan is considered to represent the most appropriate solution.
Opposition to water recycling in Havant Thicket and drinking recycled water. Comments about environmental impact, delivery risks, trust.	WRMP024 WRMP027 WRMP028 WRMP030 WRMP057 WRMP059 WRMP084 WRMP094 WRMP097	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Opposition to sewage discharges and comments about lack of trust	WRMP035 WRMP028 WRMP062 WRMP060 WRMP072	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through

Themes and issues raised in representations	Defra No.	Company consideration and response
		investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive

Themes and issues raised in representations	Defra No.	Company consideration and response
		control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
If drought orders are required then they should be used, particularly hosepipe bans for households which should be introduced much earlier than they have been in the past. If drought orders will be in place up to 2039, why stop them in 2040?	WRMP059 WRMP086 WRMP105 WRMP023	In extreme drought events (greater than 1 in 500 year) there will continue to be the opportunity to apply for drought permits and orders. In addition, Temporary Use Bans and Non Essential use Bans will continue to be available for use in drought events.
Opposition to desalination proposals as part of the solution	WRMP068 WRMP109	The potential environmental impacts associated with desalination plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced.
Surely winter abstraction coupled with better storage is another answer to water shortages	WRMP074 WRMP084 WRMP109	Where there are available water resources, including winter abstraction, coupled with potential reservoir storage options these have been identified for development within the plan, including at Blackstone in Sussex. The storage reservoir at Havant Thicket in Hampshire is also under construction. Other water companies have new reservoir proposals in their plans,

Themes and issues raised in representations	Defra No.	Company consideration and response
		including in Oxfordshire, Kent and Sussex.
The new water supplies should be fully evaluated and more work is needed on the options appraisal. I do not agree with your timescales and believe the decisions need to be delayed for five years.	WRMP089	The Government has set the target for the increased drought resilience to be met and this is a requirement our WRMP needs to accord with. Southern Water has evaluated a wide range of options within its WRMP, leading to the identification of the selected options in the draft WRMP. There is no need for a further delay for further investigations ahead of finalising the WRMP. There will, however, be further and more detailed scheme specific investigations of the selected options as part of the preparation of applications for planning and other consents.
Poor current performance by Southern Water does not give confidence that new water supplies will be available by 2040. Drought orders may therefore still be needed	WRMP090	Where performance has fallen below the standards Southern Water expects, it has apologised and compensated customers. The proposals in the Draft WRMP will make supplies more resilient in the future and Southern Water has confidence in their delivery.
GARD would support cessation of a drought permit use where it has a genuine environmental impact and does not entail disproportionately high cost of the replacement sources. Your Test & Itchen drought permits would provide minimal benefits at c.£2 billion cost. There is no justification for stopping use of these drought permits	WRMP111	The revised delivery date for HWTWRP necessitates an extension in the availability of drought permits and orders in the Western area up to 2034-35. Early testing has shown that in the event of a drought before 2035-36, we cannot maintain supply-demand balance in the Western area without drought permits and orders. These drought permits impact the designated SSSI and SAC sites of the River Test and River Itchen and our Section 20 agreement we have signed with the Environment Agency requires us to replace these supplies and reduce reliance on drought permits and orders. Longer use will require a change to the Section 20 agreement. We have started our discussions with the regulators and other stakeholders and are making a case for this under the 'Imperative Reasons of

Themes and issues raised in representations	Defra No.	Company consideration and response
		Overriding Public Interest, (IROPI) provision in the Habitats Directive.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Agree only using them in cases of a severe drought, so that the ecosystems within the chalk streams of Hampshire can be protected. Strong encouragement for Southern Water to develop new water supplies as soon as possible in order to stop using drought orders and permits before 2040 (i.e. as earlier as possible).	WRMP051 WRMP118	The support is welcomed. The timetable for achieving drought resilience is balanced with the need to achieve significant demand management measures and new scheme delivery to facilitate this. The draft WRMP and regional plan set out scenario and sensitivity testing around this timing, and the approach set out in the plan is considered to represent the most appropriate solution.
Concerns about standard of supply to Hampshire currently.	WRMP054	There have been a number of recent interruptions to supply in Hampshire, for which Southern Water has apologised and compensated customers. The proposals in the Draft WRMP will make supplies more resilient in the future.
Comment that the future needs of the environment should be met first and then solutions found to meet the needs of other water users. Very supportive of stopping the use of drought orders and permits to leave more water in the environment. Priority should be placed on finding sustainable solutions to water demand for abstractions which pose a threat to designated sites. There should be greater ambition than 2040 for this level of resilience. Particular concerns about the impact of drought permits in the Western Area and the considerable water deficit in this area. We are very supportive of the plans to meet this deficit through leakage and demand reduction, however, have concerns that there could be overreliance on these measures without a clear contingency if these savings are more difficult to realise, particularly in the shorter term.	WRMP120	The timetable for achieving drought resilience is balanced with the need to achieve significant demand management measures and new scheme delivery to facilitate this. The draft WRMP and regional plan set out scenario and sensitivity testing around this timing, and the approach set out in the plan is considered to represent the most appropriate solution.
Proposed new sources are not located within the Council's area. The Council will liaise with Southern Water on its new Local Plan.	WRMP063	Noted


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1.3. Planning for an uncertain future

There are uncertainties associated with our forecast of future growth, climate change impact on our supplies and the degree to which we will need to reduce the amount of water we are currently taking from rivers and groundwater. To account for the uncertainties in these forecasts, we have adopted an adaptive planning approach for our WRMP24. Consequently, instead of planning for a single supply-demand balance scenario, we have looked at nine different future supply-demand balance scenarios and developed a plan that can be adapted to meet supply under any of those scenarios. As part of the consultation, we asked if this were any additional supply-demand scenarios that we need to consider.

1.1.4. Question 4: We have considered a range of future scenarios in our adaptive planning approach. Are there any other future scenarios that you think we should consider?

Of the respondents to this question, approximately 54% said yes there were, whilst 25% said there weren't (Figure 4.4, Table 4.4).

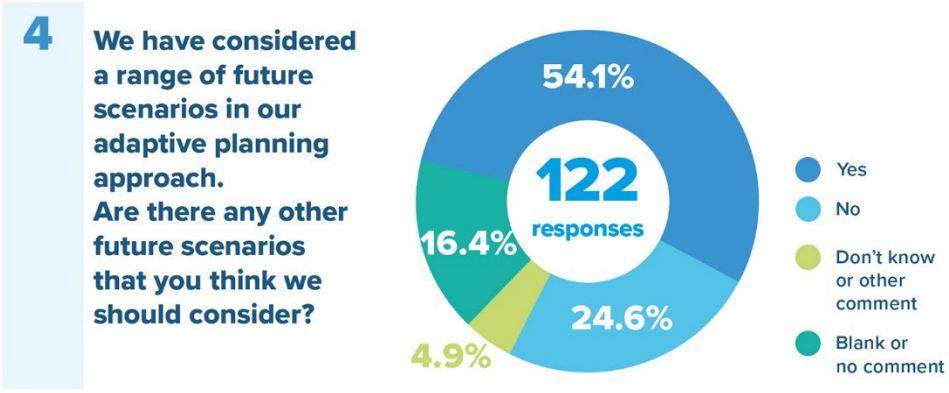

Figure 4.3 Feedback on Question 4.

Table 4.4 Summary of feedback on Question 4.

	Key themes in responses to Question 4
Yes (54.1%)	• Should maximise the potential for saving water through fixing leaks, and helping customers become more water efficient. • Concerns that more extreme climate scenarios could be faced, and that the potential for higher winter rainfall has not been captured • Should develop a strategy that focuses on delivering more reservoir storage, more household storage and greywater recycling, to maximise the use of water that is available • Concerns about poor customer service (secure supplies), sewage discharges, focus on shareholders and not customers • Opposition to water recycling into Havant Thicket reservoir • Significant uncertainty in the future forecasts, need for flexibility to adapt, need to maintain close liaison with local authorities over housing growth
No (24.6%)	• Support for the forecasts and scenarios • The range of forecasts appears wide ranging and covers the potential futures being faced • Concerned that adaptive planning enables short term actions to be put off for longer term plans • Need for regular review of the forecasts and scenarios
Don't know or other comment	• Need to plan for the worst scenarios • Important to consider wide range of issues

	Key themes in responses to Question 4
(4.0%)	• Should be more focus on leakage reduction and water efficiency
Blank or no comment (16.4%)	

Summary response to the comments on Question 4

The table below contains our detailed responses to the comments made in Question 4. The scale of future challenges we are facing, and the adaptive planning approach we are adopting with the other companies in the south east are considered to be an appropriate basis on which to base our WRMP. Our WRMP24 will continue to be an adaptive plan, looking to maintain supplies across multiple supply-demand scenarios.

Changes to our plan as a result of the feedback on Question 4

The majority of respondents were supportive of our methodology and therefore there has been no fundamental change to our adaptive planning approach.

We have updated our growth forecast to comply with WRPG and have also revised our supply forecast (Section 8). The future supply-demand scenarios we have looked at and the options selected under each to maintain supply-demand balance are discussed in Section 9.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Further range of climate change risks and scenarios, including potential for earlier or more severe impacts than currently planned for. Comments also on wider climate change impacts, including on water quality, flooding, freeze thaw, changes to agriculture etc.	WRMP031 WRMP032 WRMP109 WRMP068 WRMP046 WRMP097	The climate change scenarios selected as the basis for the adaptive planning approach are part of a wide range of potential climate change forecasts developed for use in the plan. These cover the wide range of potential impacts identified in the comments. In addition, the assessment of individual options through the options appraisal and environmental assessments of the WRMP has considered climate change impacts on each option.
Question whether population growth will be as high as anticipated.	WRMP046	The population growth forecasts used as the basis for the adaptive plan cover the full range of potential growth forecasts, both higher and lower than currently planned levels of household and population growth. The plan is capable of adapting to the range of forecasts adopted.
Adaptive planning approach appears to place greater weight on the uncertainties surrounding future growth, than other important decisions regarding environmental improvements or the impacts of climate change. This seems strange given that the difference in future needs are far greater as a result of changes to those factors, rather than the growth scenarios chosen.	WRMP065	This is not correct, as each of the key challenges to future water resources listed has been taken into account as part of the adaptive planning work. It is not correct to say that one has been prioritised over any other.
There appears to be no recognition of the part to be played by industry in reducing its demand	WRMP078	The needs of other sectors and the potential for non-household water efficiency measures has been incorporated into the draft WRMP proposals.
Concerns about delivery risks to achieving the intended 109 l/p/d given it will require education, behavioural change, and improvements in water efficiency that may not be achievable. The strategy therefore requires a pathway where this is not achieved or takes longer the achieve or a situation where population growth is higher than the worst case scenario based on evidence available at that time.	WRMP103	The adaptive planning approach has tested various sensitivity tests and scenarios relating to the delivery risks of the demand management and leakage reduction measures, as well as the options selected in the plan. The results are presented in the draft WRMP. Through monitoring of progress towards delivery through WRMP Annual Review publications, and the five yearly cycle of WRMP preparation,

Themes and issues raised in representations	Defra No.	Company consideration and response
		this can be carefully monitored and any corrective action taken.
Need more information on near future scenarios - looking at 1:100 or 1:500 year scenarios helpfully avoids urgent issues which SW needs to address.	WRMP106	It is not accepted that adaptive planning avoids or delays decision making. On the contrary, the adopted approach seeks to make 'least regret' investment decisions to ensure that necessary new infrastructure is delivered efficiently and on a timely basis.
Though the DWRMP (pp. 72-73) considers three separate scenarios to reflect the differing forecasts of the potential impacts, it is unclear as to how these inform the 'adaptive planning approach' as outlined in the NTS (graphic p.25) which fails to identify climate change as a factor in any of its demand projections.	WRMP116	Adaptive planning is an approach by which a range of potential future levels of water resources need are planned for in a way that enables new information and data updates to be fed into future plan cycles and decisions taken to adapt between the different branches within the adaptive plan. The new infrastructure and other options selected in the early branches in the adaptive plan are required under any of the potential futures.
The Council believes that Southern Water have considered an appropriate range of future scenarios for predicting future water demand across the region. The Council welcomes the proposal to pursue the scenario of 'high environmental improvement and climate change' with a medium population growth. The Council encourages Southern Water to continue working with Local Planning Authorities in the region to understand the future demands for development in Hampshire and ensure sustainable development is achieved.	WRMP118	This support for the draft WRMP approach and proposals is welcomed.
The Council would ask whether the latest housing figures and population projections used take account of emerging Local Plans or only those that have been adopted? It is important to capture the latest evidence as some plans in the region. The Council would also question why there is not a scenario base on technological improvements and the influence that this may have.	WRMP119	A range of future population and household projections have been used within the draft WRMP, including scenarios based on current planned housing growth, and higher and lower forecasts. On technology, options within the plan (both demand management and new resource developments) do consider the potential for technological advances over the planning period.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments on specific options types, including opportunity to harness water from flood events, storing it to increase supplies. Support for new reservoirs in Hampshire. Support for national water grid and water transfers. Support for desalination plants.	WRMP003 WRMP012 WRMP004 WRMP014 WRMP081 WRMP040 WRMP050 WRMP112 WRMP115 WRMP049 WRMP089 WRMP092 WRMP095 WRMP030 WRMP046 WRMP097	The comments on individual options are noted. These do not relate to the adaptive planning approach or scenarios in the question.
Comments on lack of choice for customers (unlike electricity sector)	WRMP010	The comments are noted. These do not relate to the adaptive planning approach or scenarios in the question.
Support for working with local planning authorities to ensure that water resources for new housing developments are adequately planned for	WRMP011	Southern Water works closely with local planning authorities and welcomes this support.
Comment that Southern Water should object to new housing developments	WRMP072	Southern Water is not a statutory consultee on applications for planning permission, but where consulted Southern Water does provide comments on the water resources and wastewater implications of new housing and other developments.
Comments on shareholder dividends, profit levels and performance related pay, compared to customer service levels. Comments on renationalisation of water and reduction of profits going to shareholders	WRMP013 WRMP055 WRMP082 WRMP054 WRMP070 WRMP095 WRMP026	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Support for investment to address existing problems and to meet future needs	WRMP054 WRMP082 WRMP058 WRMP070 WRMP030	The draft WRMP proposes significant new investment to safeguard supplies for customers.

Themes and issues raised in representations	Defra No.	Company consideration and response
Opposition to water recycling in Havant Thicket. Concerns about environmental impacts. Comments on trust.	WRMP020 WRMP027 WRMP084 WRMP089 WRMP094 WRMP101	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Support for grey water recycling, capture and re-use of available supplies, SUDS, water efficiency and leakage reduction.	WRMP041 WRMP024 WRMP043 WRMP060 WRMP13 WRMP015 WRMP112 WRMP023 WRMP024 WRMP049 WRMP071 WRMP087 WRMP092 WRMP076	The comments on individual options are noted. These do not relate to the adaptive planning approach or scenarios in the question.

Themes and issues raised in representations	Defra No.	Company consideration and response
Opposition to the proposals in the plan (reasons not specified) and/or comments unrelated to the question, or no suggestions to make	WRMP039 WRMP057 WRMP066 WRMP114 WRMP079	The comments are noted.
Opposition to sewage discharges	WRMP027 WRMP028 WRMP025 WRMP062 WRMP084	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment

Themes and issues raised in representations	Defra No.	Company consideration and response
		works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments from respondents who disagreed.		
The three scenarios post 2030 and the nine scenarios post 2035 cover a wide enough range of variables at this stage in the process, but need to be kept under review and updated to take account of new data and trends as soon as it becomes available, including population and housing growth, climate change etc. The WRMP24 should be adaptable between scenarios rather than become fixed to a particular scenario approach. .	WRMP117 WRMP113 WRMP105 WRMP022	The importance of keeping forecasts under review and updating when new data and information becomes available is highlighted within the draft WRMP. Southern Water will work closely with other water companies within the region through WRSE as part of this process.
Support for adaptive planning and general comments on adaptive planning, uncertainties and scale of the challenges being faced.	WRMP067 WRMP090 WRMP064 WRMP017 WRMP047 WRMP049	The support is welcomed. The scale of the future challenges means that an adaptive planning approach is an appropriate method for water resources planning.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comment on the need to ensure that the plan secures enough water supplies to cater for future planned growth.	WRMP108	Southern Water works closely with local planning authorities to ensure that planned levels of new development can be accommodated within future water resources planning.
Concern that adaptive planning could avoid or delay major decisions in the short to medium term.	WRMP110	It is not accepted that adaptive planning avoids or delays decision making. On the contrary, the adopted approach seeks to make 'least regret' investment decisions to ensure that necessary new infrastructure is delivered efficiently and on a timely basis.
Comment that decisions about abstraction reductions should be brought forward to 2030, providing certainty for environmental improvements, lock-in priority abstraction reductions, and advance the schemes required to make up the shortfall	WRMP113	A number of sensitivity tests and scenarios have been undertaken to test the timing of decisions around abstraction reductions. The results of these were presented in the draft WRMP and regional plan. The timing adopted in the draft WRMP was determined to represent the most appropriate balance between the timing of achieving the reductions, the costs of doing so, and delivery risks relating to demand management and new resource developments necessary to secure customer supplies.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Should prioritise fixing leaks.	WRMP018	The draft WRMP sets out Southern Water's ambitious plans to invest significantly in leakage reduction, building on the reductions achieved to date. This will be implemented alongside wider demand management measures and new resources development.
Opposition to water recycling in Havant Thicket	WRMP018	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is

Themes and issues raised in representations	Defra No.	Company consideration and response
		transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the

Themes and issues raised in representations	Defra No.	Company consideration and response
		sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve

Themes and issues raised in representations	Defra No.	Company consideration and response
		company performance. We have not paid external dividends since 2017
The plan needs to identify solutions that are essential for Southern Water to meet its legal obligations under the Habitats Regulations, including Total Nitrogen, nitrates and phosphates. Southern Water should continue to work with PfSH to understand the future demands relating to water resources in the Solent Catchment to ensure sustainable development is achieved. Comment also on Biodiversity Net gain and Nutrient Neutrality.	WRMP051 WRMP063	Southern Water works closely with catchment and other partners including local planning authorities over the proposals in the draft WRMP. It will continue to discuss the details of the issues raised as part of the investigation and delivery of individual schemes.
Focus on options including better storage for winter water, groundwater improvement schemes, managed aquifer recharge schemes, purchasing licences from industry, water trading with third parties and finding alternative sources for industry and agriculture, more challenging targets for leakage reduction and water efficiency.	WRMP074	The comments are noted. These do not relate to the adaptive planning approach or scenarios in the question.
Should plan for the worst case scenarios	WRMP083	The adaptive planning approach enables a wide range of potential futures to be planned for, ensuring that investment decisions in the short term are capable of adapting to a range of future water resources needs.

1.4. Efficient use of water

Reducing demand is a key part of our strategy to maintain supply-demand balance up to 2075. Our Draft Plan aimed to reduce leakage by 50% by 2050 and average Per Capita Consumption (PCC) to 109 litres per head per day (l/h/d) by 2040. As part of questions 5 and 6, we sought views on whether these targets were appropriate.

Water companies can introduce some measures to reduce consumption by customers, but these cannot by themselves deliver the required reductions in PCC. There are additional measures that will need to be introduced by the Government from 2026. As part of Question 7, we sought views on the Government led interventions and the timing of their implementation.

While we are aiming to eliminate reliance on measures to increase supplies, except in severe droughts, by 2040, we still plan to introduce restrictions on water use by customers during periods of droughts. This is done so that we do not build schemes that will only be required during periods of drought and therefore do not deliver value for money for our customers. Question 8 asked if this was an acceptable approach.

1.1.5. Question 5: Do you support our plan to at least halve leakage by 2050?

Of the respondents to this question, approximately 57% agreed, whilst 35% disagreed (Figure 4.5, Table 4.5).

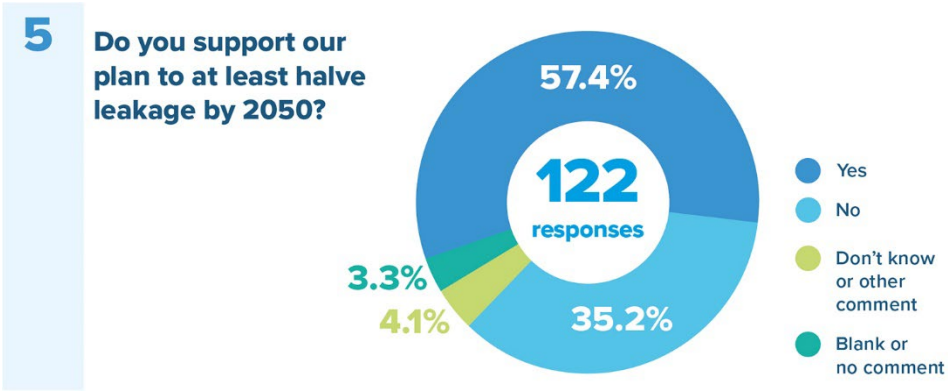

Figure 4.4 Feedback on Question 5.

Table 4.5 Summary of feedback on Question 5.

	Key themes in responses to Question 5
Yes (57.4%)	• Strong support for plans to reduce leakage • Comments that leakage reduction should be pursued faster, or that higher targets should be planned for • Support, but want more details on how this will be achieved and at what cost to customers • Support but concerned at the financial and carbon cost of achieving this • Support but would like to understand comparison between cost of saving water through reducing leaks and cost of building more resources (e.g. desalination) • Support but concerned targets do not match EIP requirements • Support for more leakage reduction instead of water recycling into Havant Thicket
No (35.2%)	• 2050 considered to be far too late, other dates suggested, including 2030, 2040 • Comments that higher targets should be pursed, with figures including 75%, 80% or 100% mentioned • The economics of leakage reduction need to be considered • Southern Water should pursue leakage reduction faster in priority catchments, e.g.

	Key themes in responses to Question 5
	Test and Itchen • Opposition to water recycling into Havant Thicket reservoir • Concerns about customer service (secure supplies) and focus on shareholders not customers • Concerns about ability to achieve the targets, and comment that interim targets need to be set
Don't know or other comment (4.1%)	• Leakage reduction should be prioritised ahead of new resource development • Greater use of technology should assist with identifying and tackling leakage • Opposition to sewage discharges
Blank or no comment (33%)	

Summary response to the comments on Question 5

The table below contains our detailed responses to the comments made in Question 5.

Water companies are required to reduce leakage by 50% and achieve a PCC of 110l/h/d by 2050. In addition, they are also expected to reduce non-household consumption by 9% by 2038. We are aiming to meet the PCC, non-household consumption and leakage reduction targets set by the Government as a minimum. We have considered scenarios involving greater reduction in PCC and leakage than that required by guidance. We have finalised our demand reduction targets after careful consideration of the deliverability risk.

Changes to our plan as a result of the feedback on Question 5

We have reviewed the options that we will use to reduce leakage over time and costs associated with them. This is discussed further in Section 8. Through the regional planning approach we have re-assessed the costs and benefits associated with leakage reduction and compared against alternative solutions.

Based on this re-assessment we have selected 50% reduction by 2050 as our preferred strategy.

We will set annual targets for our leakage reduction to meet this overarching target through to 2050 and will report annual on our progress.

Question 5: Do you support our plan to at least halve leakage by 2050?

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Support for leakage reduction plans, with comments on the importance of reducing leakage. Some respondents stated that higher levels should be achieved, and/or the targets should be achieved sooner.	WRMP008 WRMP007 WRMP027 WRMP028 WRMP029 WRMP042 WRMP060 WRMP052 WRMP063 WRMP003 WRMP004 WRMP119 WRMP032 WRMP037 WRMP092 WRMP116 WRMP107 WRMP108 WRMP111 WRMP066 WRMP067 WRMP070 WRMP097 WRMP100 WRMP065 WRMP009 WRMP047 WRMP049 WRMP076 WRMP087 WRMP098 WRMP099 WRMP113	The support for the leakage proposals in the draft WRMP is welcomed. Whilst many respondents indicated support for higher targets to be achieved, and/or for the targets to be achieved earlier, the assessment that Southern Water has undertaken and set out in the WRMP was clear that there were significant additional financial costs associated with doing so, as well as increased risks to the successful achievement of higher targets or earlier targets. We are aiming to meet the PCC, non-household consumption and leakage reduction targets set by the Government as a minimum. We have considered scenarios involving greater reductions in PCC and leakage than that required by guidance. We finalised our demand reduction targets after careful consideration of the deliverability risk.
Halving leakage by 2050 is in line with sector commitments. However, it is unclear if the plan will enable the company to meet the EIP ambition of reducing leakage by 37% by 31st March 2038.	WRMP064	
Comments that leakage reduction and demand management are both important parts of the solution. Reducing leakage is important not only to conserve water but also for the public perception of, and trust in water companies. Customers are more likely to make efforts to reduce their own water use when they see that their company is doing what it can to reduce waste too.	WRMP006 WRMP012 WRMP040 WRMP047 WRMP064 WRMP081 WRMP087 WRMP098	The linkage between Southern Water's work to reduce leakage and its work with customers to promote water efficiency and demand management, is very clearly understood. Customers expect Southern Water to do its part and work hard to reduce leakage, and this is what Southern Water is committing to in its WRMP, building on the significant leakage reduction achieved to date.
Comments about whether the target will be met, and concerns about shareholders profits.	WRMP030 WRMP076	Southern Water has met its targets for leakage reduction and has worked hard to reduce levels of leakage, and compares favourably to other water companies in this area.
Concern that action on leakage has not been taken to date, with reported leaks not being fixed quickly enough.	WRMP114 WRMP024 WRMP088	
Comments on the importance of meters in helping identify leaks	WRMP031	The roll-out of meters significantly increases the level of information on water usage and this helps to track and identify potential leaks, particularly within supply pipes to customer properties.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments that there should be no leakage ideally.	WRMP041	The comment is noted, and whilst reducing leakage to zero may be an ultimate goal for some respondents, the financial costs of seeking to achieve this would be very significant and increase customer bills significantly. There is a balance that needs to be struck between the financial, carbon and environmental impact arising from leaks, the costs and disruption in seeking to find and fix them. The proposals in the WRMP are considered by Southern Water to be the most appropriate balance between these factors.
Comments on the costs and benefits of leakage reduction, recognising that leakage reduction can be increasingly expensive and the costs need to be taken into account. Carbon impacts also mentioned.	WRMP046 WRMP031 WRMP022	
Comments and requests for specific details on how Southern Water plans to achieve this level of leakage reduction - the techniques it plans to use, and the importance of liaison with customers and affected local communities.	WRMP049 WRMP068 WRMP084	The draft WRMP provides an explanation and overview of the leakage reduction proposals that Southern Water plans to implement. These proposals will be developed in detail over the period before 2025 (the start of the WRMP period), taking account the experience and knowledge gained from Southern Water's ongoing implementation of leakage reduction measures during the current period.
Comments on the economics of fixing leaks compared to the costs of providing new water resources and the comparison between the two.	WRMP061	The investment modelling undertaken as part of developing the WRMP includes demand management (including leakage reduction) options, alongside options to develop new water resources options. The investment model optimises the selection of options on cost, and then on other best value metrics and criteria. This enables the comparative cost of leakage reduction options and new resource development options to be fully explored as part of the preparation of the WRMP.
Comments on the role of customers in helping the company achieve its target, particularly with significant water losses through supply pipes (which metering will help identify). They need to be educated on what to do when they spot a leak, and companies should make it easy for customers to report a leak and also have a transparent process for keeping customers updated on the progress of the actions the company is taking in response to the report.	WRMP064 WRMP113	Southern Water recognises the significant role of its customers in working with the company to help to identify leaks and their subsequent repair. Leak repairs can be disruptive to local communities and the company strives to work with affected communities to keep disruption to a minimum. Leaks are able to be reported online or by phone to Southern Water and the customer contact centre tracks leaks and is able to advise on progress.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments on the need to improve services to customers who have experienced supply problems recently.	WRMP071	There have been a number of recent interruptions to supply in Hampshire, for which Southern Water has apologised and compensated customers. The proposals in the Draft WRMP will make supplies more resilient in the future.
Opposition to water recycling in Havant Thicket and support for leakage reduction instead.	WRMP094 WRMP039	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who disagreed.		
Concern that 2050 is too late, and that it should be achieved more quickly. Also, reducing leaks only by 50% was not considered challenging enough - it should be higher, particularly given scale of challenge being faced.	WRMP005 WRMP010 WRMP026 WRMP050 WRMP055 WRMP014 WRMP016 WRMP020 WRMP033 WRMP036 WRMP044 WRMP079 WRMP085 WRMP097 WRMP102 WRMP112 WRMP115 WRMP015 WRMP018 WRMP023 WRMP058 WRMP073 WRMP080 WRMP101 WRMP106 WRMP021 WRMP051 WRMP056 WRMP086 WRMP089 WRMP091 WRMP095 WRMP105 WRMP062 WRMP078 WRMP082 WRMP103	Whilst many respondents indicated support for higher targets to be achieved, and/or for the targets to be achieved earlier, the assessment that Southern Water has undertaken and set out in the WRMP was clear that there were significant additional financial costs associated with doing so, as well as increased risks to the successful achievement of higher targets or earlier targets. We are aiming to meet the PCC, non-household consumption and leakage reduction targets set by the Government as a minimum. We have considered scenarios involving greater reductions in PCC and leakage than that required by guidance. We have finalised our demand reduction targets after careful consideration of the deliverability risk. Funding for leakage reduction is secured through the Business Plan process and Ofwat has powers to impose fines should company performance targets and achievement of objectives not be met.
There should be interim targets giving confidence to customers, other users and local and central government that targets will be achieved in the timescale envisaged. There must also be penalties for failure to achieve these targets, interim and long-term, which should be felt by shareholders and company management - not customers.	WRMP078 WRMP103 WRMP110 WRMP057	
The WRMP identifies priority catchments and the timeframes for halving leakage should be brought forward to 2030 and 2040 in line with the high priority catchments. This is particularly important in the Test and Itchen catchments where there are water abstraction and supply issues	WRMP051	We need to reduce leakage across our company area and have developed a profile to reduce leakage in a cost-effective manner. We will keep this under review. For other demand management measures such as increase in meter penetration and replacement of existing meters with smart meters, we have prioritised WRZs in Sussex and Hampshire.
Comments on shareholder profits	WRMP021 WRMP056 WRMP072	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This

Themes and issues raised in representations	Defra No.	Company consideration and response
		financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Leakage needs to be based on economics - value of water v cost to find & repair. Having a blanket reduction target is pointless- it needs to be focussed on the supply demand balance	WRMP048	There is a balance that needs to be struck between the financial, carbon and environmental impact arising from leaks, the costs and disruption in seeking to find and fix them. The proposals in the WRMP are considered by Southern Water to be the most appropriate balance between these factors.
Opposition to sewage discharges	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving

Themes and issues raised in representations	Defra No.	Company consideration and response
		the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments and concerns whether targets would be met given perceived poor performance to date and previous targets being missed.	WRMP109 WRMP110	Southern Water has met its targets for leakage reduction and has worked hard to reduce levels of leakage, and compares favourably to other water companies in this area.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our

Themes and issues raised in representations	Defra No.	Company consideration and response
		pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments that Southern Water needs to be more ambitious on leakage, as this will have substantial benefits to the overall amount of water resources available to customers and the environment. Comment that more satisfactory targets would be to halve leakages in the high priority catchments by 2030, by 2040 for medium priority catchments and by 2050 for low priority catchments. Goals and milestones against which customers, shareholders and stakeholders can hold Southern Water to account are needed.	WRMP118 WRMP117 WRMP120	Whilst many respondents indicated support for higher targets to be achieved, and/or for the targets to be achieved earlier, the assessment that Southern Water has undertaken and set out in the WRMP was clear that there were significant additional financial costs associated with doing so, as well as increased risks to the successful achievement of higher targets or earlier targets. We are aiming to meet the PCC, non-household consumption and leakage reduction targets set by the Government as a minimum. We have considered scenarios involving greater reductions in PCC and leakage than that required by guidance. We have finalised our demand reduction targets after careful consideration of the deliverability risk.

1.1.6. Question 6: Do you support us achieving our WRMP target of reducing average personal daily use from 131 litres per person per day to a) 109 litres by 2040 or b) should we retain our more ambitious target of 100 litres per person per day by 2040?

Of the respondents to this question, approximately 30% wanted us to achieve the 109l/h/d target, whilst 48% wanted us to retain the target of a PCC of 100l/h/d by 2040 (Figure 4.6, Table 4.6).

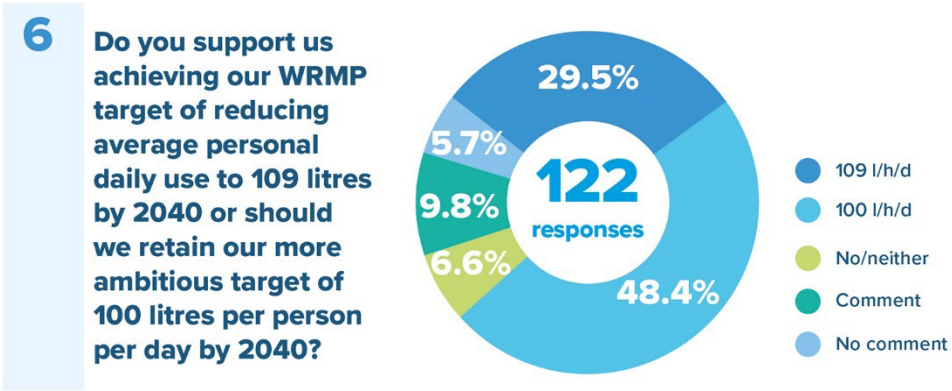

Figure 4.5 Feedback on Question 6.

Table 4.6 Summary of feedback on Question 6.

	Key themes in responses to Question 6
109 l/h/d (29.5%)	• Strong support for greater water efficiency – everyone's role to help with this. • Support for the target but request for more details on how this is to be achieved. • Concerns that Government action will be needed to achieve the reductions. • Comments that the target should be achieved sooner • Comments that 109 seems more achievable than 100 • Concern that climate change will increase water use making the target harder to achieve • Comments highlighted work being done by local authorities to bring in more efficient new housing • Comments that Southern Water should fix leaks first, then customers may be willing to be more efficient. • Concerns that Southern Water's customers may not work with them to achieve this, including due to sewage discharges and poor customer service (secure supplies) • Some comments that as customers pay for water use they should be able to use what they like, and/or it is for Southern Water to provide the supplies
100 l/h/d (48.4%)	• Strong support for greater water efficiency – everyone's role to help with this. • Scale of challenge, and climate change, means highest target should be pursued • Support for retaining target 100 – should not be reduced • Comments that high water users should pay more for the water they use, and/or tariffs should be used to benefit low water users and penalise high users • Comments that the higher target of 100 is achievable and must be pursued • New housing can already be water efficient – no reason target cannot be met • Requests for details of how this will be achieved, and how non household water use will be reduced.
No/neither (6.6%	• Concerns that customers could be penalized for high use – risks to vulnerable households, high water users for health reasons and low income households • Objections to Southern Water telling customers how much water they can use • Concerns that the two targets are not ambitious enough – especially given water neutrality issues in Sussex North
Comment (9.8%)	• Concerns both targets are unachievable • Comment that Equalities Impact Assessment is required due to potential impacts

	Key themes in responses to Question 6
	• Comment on need for extensive cost benefit analysis of the options • Comment that Southern Water should invest in its infrastructure, not expect customers to do all the work reducing demand • Opposition to sewage discharges
No comment (5.7%)	

Summary response to the comments on Question 6

The Table below contains our detailed responses to the comments made in Question 6. As mentioned earlier, a revised WRPG was issued after consultation on the Draft Plan had closed. The revised WRPG requires water companies to aim for a PCC of 110l/h/d by 2050 under dry year conditions. In our case, this roughly equates to a PCC of 100l/h/d under normal year conditions. For our revised draft WRMP, we considered different PCC reduction scenarios. In our rdWRMP24 we aim to achieve a PCC of 110l/h/d by 2045, which is five years earlier than the Government requirement.

Changes to our plan as a result of the feedback on Question 6

For the Revised Plan, we have revised our PCC reduction scenarios such that we comply with the new regulatory expectation under the updated Water Resource Planning Guidance to achieve 110l/h/d under dry year conditions by 2050 as a minimum along with a more ambitious scenario of achieving this target by 2040.

We have revised the options for achieving the target PCC under these two scenarios and the associated costs. This is further discussed in Section 8.

Through the regional planning approach we have re-assessed the costs and benefits associated with PCC reduction and compared against alternative solutions. Based on this re-assessment, we will adopt a PCC target of 110l/h/d by 2045 under dry year conditions (Section 9).

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed with 109 l / h / d target.		
Support for the planned target.	WRMP008 WRMP067 WRMP119 WRMP109	The support for the target is noted.
Support in principle your target of reducing personal daily use to 109 litres by 2040 but need details of how this can be achieved.	WRMP012	The draft WRMP provides an explanation and overview of the demand management proposals that Southern Water plans to implement. These proposals will be developed in detail over the period before 2025 (the start of the WRMP period), taking account the experience and knowledge gained from Southern Water's ongoing implementation of measures during the current period. Southern Water recognises the need for the support of its customers to achieve the planned targets, and considers them to be achievable.
Questions how Southern Water would achieve the target. Comments about how achievable it is, and whether Southern Water has the support of its customers to achieve it. Targets need to be realistic.	WRMP057 WRMP066 WRMP031 WRMP092 WRMP009 WRMP019	
Comments that if customers are paying they should be able to use as much as they want to. Comments that its not customers, but Southern Water that should be acting.	WRMP014 WRMP034	Southern Water is investing significantly in measures to encourage customers to use less water. It recognises that there are customers who consider that they can pay for and use as much water as they like. Over time measures including tariffs may be introduced to provide a financial encouragement (or penalty) for households using high levels of water. There will need to be careful protections for those with medical, care or other needs, and financially vulnerable households.
Comment that more water can be saved through fixing leaks. Comments supporting fixing leaks. Comments that water efficiency reductions are more than leakage savings, and leakage should be reduced first.	WRMP016 WRMP018 WRMP031 WRMP076 WRMP109 WRMP115	The linkage between Southern Water's work to reduce leakage and its work with customers to promote water efficiency and demand management, is very clearly understood. Customers expect Southern Water to do its part and work hard to reduce leakage, and this is what Southern Water is committing to in its WRMP, building on the significant leakage reduction achieved to date.
Comments about the need to enable customers to undertake gardening and summer play activities (e.g. paddling pools), and that the targets should allow for this.	WRMP029	The planned targets are averages and there will be people using more or less than the average water use. With the introduction of water meters, some customers will choose to pay for higher levels of water use. In a drought, additional restrictions can be introduced to prevent the use of hosepipes

Themes and issues raised in representations	Defra No.	Company consideration and response
		etc, as a necessary action to protect other customers supplies and the environment.
Target needs to be sooner.	WRMP058	Southern Water has tested different dates and different targets and considers that the identified targets are the most appropriate balance between different factors. The 109l/h/d and 100l/h/d target reflect different levels of action and financial cost to achieve them.
Comment that neither target is acceptable and that the question doesn't offer a real choice	WRMP088	
Questions whether, with climate change, this is achievable. Comment that reducing consumer demand is challenging to achieve, especially as more people are now working from home.	WRMP090 WRMP108	The targets take into account changes to customer use, and available supplies, resulting from climate change. They also factor in changes to non-household and household use resulting from more people working from home.
Current usage is around 134 litres per person per day. 109 litres will be difficult to achieve unless there are legislative changes in terms of water efficiency of appliances and water fittings. If this target can be bettered, then it provides greater headroom within the adaptive pathway. The notion of an 'innovative tariff' is of some concern because it implies that pricing could be used to reduce demand – i.e. that beyond a certain level of usage the price per unit of water would increase. This could have Equality Act 2010 implications in that it could disadvantage protected characteristic groups.	WRMP103	The planned target is reliant on Government interventions in the form of policy changes, water efficiency standards and building regulation changes. Without these, and co-ordinated media and other campaigns to promote the need to use less water, the targets will not be met. The use of tariffs as a tool will require the consideration of protections for those with medical, care or other needs, and financially vulnerable households.
Comments from respondents who agreed with 100 l / h / d target.		
Support for the planned Target 100. Comment that given the scale of the challenge, the hardest target is appropriate and will help the environment. Comments on the role of local planning authorities. Comments on the importance of customer support and campaigns to raise awareness.	WRMP003 WRMP083 WRMP005 WRMP020 WRMP028 WRMP049 WRMP052 WRMP060 WRMP065 WRMP078 WRMP079 WRMP091 WRMP089 WRMP094 WRMP099 WRMP101 WRMP105 WRMP107 WRMP114 WRMP120 WRMP111 WRMP113	The support for the target is noted, and the comments in support welcomed.

Themes and issues raised in representations	Defra No.	Company consideration and response
	WRMP118 WRMP116 WRMP064 WRMP063	
Comments that the Target 100 is achievable and necessary, but the targets are not ambitious enough and that water usage for some households is below this level already. Research shows much lower targets can be achieved.	WRMP023 WRMP047	The planned targets are averages and there will be people using more or less than the average water use. Southern Water recognises that many customers are working hard to limit their water use and welcomes their commitment in this area. Southern Water has tested different dates and different targets and considers that the identified targets are the most appropriate balance between different factors. The 109l/h/d and 100l/h/d target reflect different levels of action and financial cost to achieve them.
Comment on the need to educate customers on how to achieve this. Comments on suggested ways it could be achieved through using less water around the home, education campaigns etc.	WRMP032 WRMP036 WRMP040 WRMP030 WRMP015 WRMP022 WRMP071 WRMP099 WRMP114	The support of customers is essential to the achievement of planned targets. Whilst Southern Water can provide education, media campaigns, water audits and water efficiency measures, it is the customers who control how much water is used. Southern Water is committed to working closely with customer groups and individual customers to achieve this.
Comment on the importance of meters, and the need for tariffs to charge more for use above a certain level.	WRMP041 WRMP046 WRMP061 WRMP078	Water meter introduction has helped to increase customer awareness of their personal water use. The use of tariffs as a tool has the potential to provide a financial incentive or penalty to discourage high levels of water use. This will require the consideration of protections for those with medical, care or other needs, and financially vulnerable households.
Comments on the importance of leakage reduction alongside water efficiency.	WRMP049 WRMP099	The linkage between Southern Water's work to reduce leakage and its work with customers to promote water efficiency and demand management, is very clearly understood. Customers expect Southern Water to do its part and work hard to reduce leakage, and this is what Southern Water is committing to in its WRMP, building on the significant leakage reduction achieved to date.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments and concerns about problems with water supply recently.	WRMP054 WRMP056	There have been a number of recent interruptions to supply in Hampshire, for which Southern Water has apologised and compensated customers. The proposals in the Draft WRMP will make supplies more resilient in the future.
Comments on shareholder profits and dividends	WRMP062	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Opposition to sewage discharges.	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this.

Themes and issues raised in representations	Defra No.	Company consideration and response
		Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017

Themes and issues raised in representations	Defra No.	Company consideration and response
Comment that the target should be met sooner	WRMP112	Southern Water has tested different dates and different targets and considers that the identified targets are the most appropriate balance between different factors. The 109l/h/d and 100l/h/d target reflect different levels of action and financial cost to achieve them.
Comments on the need for Government interventions and policy support to meet the planned reductions	WRMP068	The planned target is reliant on Government interventions in the form of policy changes, water efficiency standards and building regulation changes. Without these, and co-ordinated media and other campaigns to promote the need to use less water, the targets will not be met.
Comments on the need to target reduce water use in the non-household sector, with water efficiency campaigns etc. Comments on the need to reduce demand from abstractors in other sectors, setting targets for them too.	WRMP120 WRMP113	Southern Water's plans include both household and non-household water efficiency measures. In addition, through joint work with other water companies in the south east there is increased joint working with other abstractors and other sectors to identify ways in which their future water needs can be met, including the role of greater water efficiency in their own sectors.
Comments from respondents who support neither target		
Comments on the importance of recognising the needs of individual households, who may need water for medical or care reasons.	WRMP004 WRMP002 WRMP095	Southern Water considers the needs of those with medical, care or other needs, and financially vulnerable households, as part of the preparation of its proposals. Additional protections for vulnerable households are included within the plan.
Comments that if customers are paying they should be able to use as much as they want to. Not for Southern Water to tell customers what to do.	WRMP010 WRMP024 WRMP070	Southern Water recognises that there are customers who consider that they can pay for and use as much water as they like. It is investing significantly in measures to encourage customers to use less water. Over time measures including tariffs may be introduced to provide a financial encouragement (or penalty) for households using high levels of water.
Comments on need for education campaign jointly with Government on the importance of reducing water use. Also	WRMP095	The planned targets are reliant on Government interventions in the form of policy changes, water efficiency standards and

Themes and issues raised in representations	Defra No.	Company consideration and response
comment on offering free or discounted water butts or water efficient products.		building regulation changes. Without these, and co-ordinated media and other campaigns to promote the need to use less water, the targets will not be met. Southern Water's proposals include the provision of advice and discounted or free water efficiency measures.
Comments that planning authorities in the Sussex North Water Resource Zone area are supportive of Southern Water's aims to reduce average personal use below the current level of 131 litres per person per day. Neither of Southern Water's targets is sufficiently ambitious. As a minimum however, the more ambitious target of 100 litres per day should be retained. However, proposals for emerging local plans set a target of 85 litres per person per day, which are considered realistically achievable and include the retrofitting existing housing stock.	WRMP117	We have been working closely with the local planning authorities and other parties on the specific challenges of the Sussex North WRZ arising from water neutrality measures. We welcome the planned water efficiency standards that the authorities are seeking to introduce, and will continue to work with partners to support the achievement of increased water efficiency in the WRZ. The PCC reduction we are aiming for in our rdWRMP delivers the 100 l/h/d target 5 years ahead of the Government expectation and balances ambition with what is practice\ally deliverable given that much of the projected saving relies on Government led activities that have not yet been enacted.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Disagree with the planned targets. Concerns about how they will be achieved - intrusive to customers. Need to educate people.	WRMP027 WRMP021	There is a need to encourage greater water efficiency and demand management to achieve the Government's targets for reduced personal water use. Southern Water has significant experience of working with customers and with other partners to bring forward education and media campaigns, and water efficiency advice and products for customers use.
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge

Themes and issues raised in representations	Defra No.	Company consideration and response
		Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comment that neither target is achievable as a universal target for average personal daily use as individuals differ in what is needed for their quality of life. Comment that there did not seem to be any Equality Impact Assessments on this issue.	WRMP050	Southern Water considers the needs of those with medical, care or other needs, and financially vulnerable households, as part of the preparation of its proposals. Additional protections for vulnerable households are included within the plan.
Comment that development in the Solent catchment is required to attain the optional higher Building Regulations water use standard of 110 litres per person per day to be nutrient neutral. There is therefore a need to reduce water usage in the Solent as far as technically possible in order to appropriately manage water resources in the future	WRMP051	Southern Water welcomes the planned water efficiency standards that the authorities are seeking to introduce, and Southern Water will continue to work with partners to support the achievement of increased water efficiency within the area. The targets in the WRMP are considered to be the most appropriate for the company's supply area.
Comments that there is a lack of information to enable an informed answer to be given, including on costs, use of technology, potential savings on not needing alternative new water resources, and environmental benefits. Comments also on previous work by Southern Water, including previous free water audit campaigns and water-saving device installations, which showed that after a large initial impact, this could fade over time.	WRMP069	The WRMP provided information on the demand management measures that Southern Water plans to introduce, and more detailed proposals will be worked through in the lead up to 2025 (the start of the WRMP planning period). Southern Water's previous experience of bringing forward advice and water efficient fittings for customers, as well as information from the water meter roll-out, will all be used to inform the detailed proposals.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comment that action needs to be more urgent as the current abstractions are environmentally harmful.	WRMP072 WRMP110	Southern Water has tested different dates and different targets and considers that the identified targets are the most appropriate balance between different factors. The 109l/h/d and 100l/h/d target reflect different levels of action and financial cost to achieve them.
Comment that Southern Water should invest in infrastructure, not rely on customers to use less water.	WRMP082	The WRMP includes significant planned investment in new water resources infrastructure, alongside demand management and leakage reduction measures.
Other comments, including that the wrong question is being asked, or comments generally on water use.	WRMP084 WRMP087 WRMP098	The comments are noted.

1.1.7. Question 7: Do you support additional proposed government interventions and the timing of their introduction?

Of the respondents to this question, approximately 42% agreed, whilst 34% disagreed (Figure 4.7, Table 4.7).

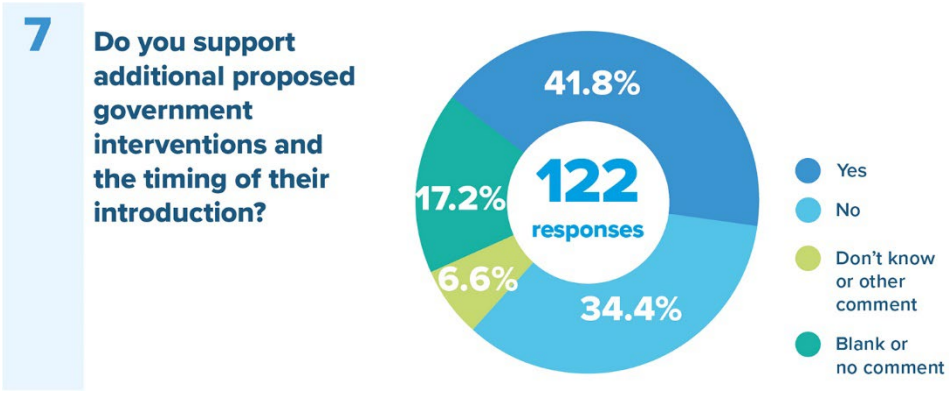

Figure 4.6 Feedback on Question 7.

Table 4.7 Summary of feedback on Question 7.

	Key themes in responses to Question 7
Yes (41.8%)	• Support for the interventions, but concern that Government may not act quickly enough • Support, but the timescales are too long and interventions are needed sooner • Support but also need to ensure customers are not adversely affected • Comments that Government should act and bring water companies back under public control • Comments and opposition to sewage discharges
No (34.4%)	• Concerns that the planned interventions are too little or too late, and that they should be accelerated. Southern Water and other companies should lobby for more urgent action • Comments that Government should not intervene, and that customers should make their own decisions • Concerns that not enough detail on what is proposed is set out in the plan • Opposition to sewage discharges
Don't know or other comment (6.6%)	• Concerns at being reliant on Government for action, and risks whether it will happen • Timings of the Government interventions should be accelerated • Water stressed nature of the area, and climate emergency, requires more urgent action • Opposition to sewage discharges
Blank or no comment (17.2%)	

Summary response to the comments on Question 7

The table below contains our detailed responses to the comments made in Question 7.

We have included Government led interventions in our options to reduce PCC/given the majority of support.

Changes to our plan as a result of the feedback on Question 7

Our revised options for reducing PCC now include Government led interventions. We have adopted the scenarios developed by WRSE for the savings associated with these interventions and their profile.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Support for the proposals set out in the plan, including recognition of the role of Government in setting policy and leadership on water efficiency. Some comments that the interventions are needed much sooner, and/or concerns at relying on the Government. Other comments that there will need to be support for customers to understand water efficiency labels etc.	WRMP006 WRMP012 WRMP041 WRMP043 WRMP119 WRMP111 WRMP012 WRMP046 WRMP085 WRMP087 WRMP098 WRMP78 WRMP083 WRMP064 WRMP033 WRMP049 WRMP063	The WRMP plans for reduced per capita consumption of water are reliant on the introduction of Government interventions. Without these interventions the targets will not be met. The support for these interventions is welcomed. Whilst the WRMP explains that earlier introduction of these Government interventions would be beneficial, this is not within the control of Southern Water, albeit that it and the other water companies will continue to lobby Government for their introduction.
Comments not relating to the question, including that the Government should intervene on sewage discharges, issue fines, nationalise the water sector etc, and comments on trust issues, poor supplies to customers.	WRMP015 WRMP023 WRMP029 WRMP055 WRMP056 WRMP058 WRMP060 WRMP070 WRMP073 WRMP076 WRMP090 WRMP114 WRMP099 WRMP102 WRMP110 WRMP034 WRMP036 WRMP049	The comments do not relate to Government water efficiency measures, instead they indicate support for Government interventions in other aspects of the water sector, including on company performance for customers, sewage discharges, fines and other factors. These do not relate to the proposals within the WRMP.
Government money should be spent on regulating water quality - ensuring they stay up to date with possible contaminants & monitoring. Also regulation on new houses built to collect rainwater for toilets and update old buildings to split water so not all going into sewers.	WRMP094	Funding for Southern Water and other water companies comes from customers, with Business Plans prepared and submitted to Ofwat which approves levels of expenditure and sets delivery commitments and other targets. Government funding comes from taxation. Southern Water works closely with local planning authorities to seek higher water efficiency standards within new developments. Proposals to retrofit existing older housing stock form part of the water efficiency measures being considered.
Not able to comment. Question not clear	WRMP022 WRMP084	Comments noted.
Opposition to sewage discharges	WRMP029 WRMP002	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as ‘good’ or ‘excellent’, with the other 3 being ‘satisfactory’.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Opposition to water recycling in Havant Thicket	WRMP076	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife

Themes and issues raised in representations	Defra No.	Company consideration and response
		We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Comments from respondents who disagreed.		
Consider that the timing is too late and the interventions should be accelerated. The timescales are too slow. Southern Water and WRSE should urge the Government to act sooner.	WRMP007 WRMP009 WRMP047 WRMP052 WRMP065 WRMP068 WRMP082 WRMP092 WRMP105 WRMP032 WRMP103 WRMP116 WRMP117 WRMP113 WRMP118 WRMP120	Southern Water and other water companies in the south east through WRSE have tested different dates and different combinations of Government interventions. Whilst the WRMP explains that earlier introduction of these Government interventions would be beneficial, this is not within the control of Southern Water, albeit that it and the other water companies will continue to lobby Government for their introduction
I think that's sufficient and we should wait and see how climate will perform and how useful will be current measures	WRMP008	Comment noted.
Local people should have a say in this and not be dictated to by government.	WRMP011 WRMP067 WRMP097 WRMP112	The Government interventions, including water labelling and building regulations would be implemented nationally by Government.
Comments on the need to fix leaks	WRMP013 WRMP032	The linkage between Southern Water's work to reduce leakage and its work with customers to promote water efficiency and demand management, is very clearly understood. Customers expect Southern Water to do its part and work hard to reduce leakage, and this is what Southern Water is committing to in its WRMP, building on the significant leakage reduction achieved to date.
Comments on profits to shareholders.	WRMP013 WRMP014	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders

Themes and issues raised in representations	Defra No.	Company consideration and response
		strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Not sure what these are as not have been explained. Need more information to comment.	WRMP016 WRMP027 WRMP028 WRMP057 WRMP071 WRMP079 WRMP101	The types of Government interventions are explained in the WRMP, including water labelling and building regulations.
Opposition to sewage discharges	WRMP062 WRMP013	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our

Themes and issues raised in representations	Defra No.	Company consideration and response
		communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Concerns that reliance on government may result in delays or changes to proposals as a result of Government decisions.	WRMP066 WRMP050	The timing and detail of the Government interventions is not within the control of Southern Water, albeit that it and the

Themes and issues raised in representations	Defra No.	Company consideration and response
		other water companies will continue to lobby Government for their early introduction.
Other comments not related to the question, including that Government intervention is needed to stop poor water company performance, sewage discharges etc.	WRMP072 WRMP106 WRMP109 WRMP014	The comments do not relate to Government water efficiency measures, instead they indicate support for Government interventions in other aspects of the water sector, including on company performance for customers, sewage discharges, fines and other factors. These do not relate to the proposals within the WRMP.
Comment that Southern Water should be more active in commenting on planning decisions, and proactively work with local authorities and developers to minimise the water demand footprint of new development focussing on those areas with greatest growth and environmental pressure. We think that if new developments cannot be provided with adequate water without causing environmental harm then they should not be allocated on Local Plans or given planning permission.	WRMP113	Southern Water already engages in the planning process, both in commenting on Local Plans and responding to consultations on planning applications, when it is consulted by local planning authorities. The WRMP takes account of planned levels of growth in Local Plans, and also models higher and lower levels of growth, to ensure that the WRMP is capable of adapting to changes that may occur in the future.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Unsure, including unsure on relying on Government.	WRMP005 WRMP061 WRMP095	Comments are noted.
Concerns that given that the Solent, and particularly the Test and Itchen is a water stressed area. Measures should be introduced much earlier given that many PfSH authorities have declared 'climate emergencies', to help reduce water use swiftly in the short and medium term.	WRMP051	The timing and detail of the Government interventions is not within the control of Southern Water, albeit that it and the other water companies will continue to lobby Government for their early introduction.

1.1.8. Question 8: Our plan continues to rely upon temporary restrictions on water use to help lower demand during droughts to avoid further investment in new supplies. Do you agree with our approach to continue using temporary water restrictions during droughts?

Of the respondents to the question, approximately 69% agreed, whilst 21% disagreed (Figure 4.8, Table 4.8).

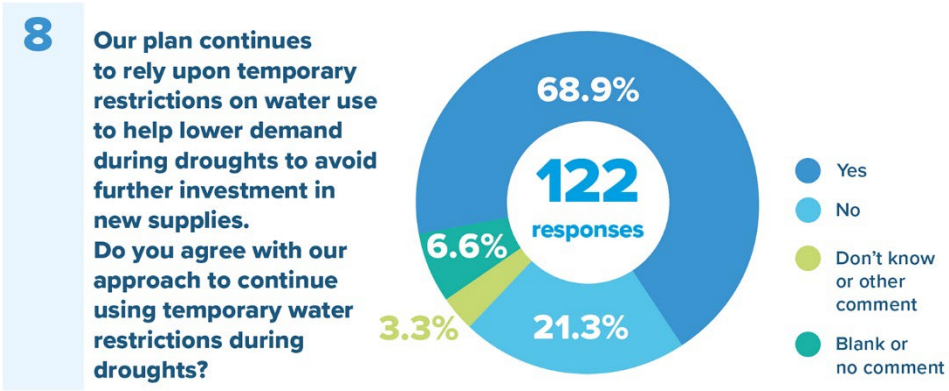

Figure 4.7 Feedback on Question 8.

Table 4.8 Summary of feedback on Question 8.

	Key themes in responses to Question 8
Yes (68.9%)	• Support for their continued use when necessary, but only when necessary due to environmental reasons not failures to invest or deliver. • Important part of the balance between supply and demand in a drought • Comments on the nature of restrictions – and need to be fair to customers by restricting non household water use too • Essential part of the plan, and provides clear means of educating customers about water efficiency • Support for consideration of tariffs as part of the approach, and higher pricing during droughts • Comments that leaks also need to be fixed, and Southern Water needs to invest in new supplies too.
No (21.3%)	• Customers shouldn't have water restrictions – Southern Water need to provide adequate supplies • Comments that leaks need to be fixed first, before restricting customer supplies • Opposition due to impacts on customers. If they pay for a service they should be able to use it • Comments that Southern Water needs to develop more resources, e.g. reservoirs • Concerns that there aren't any other options • Opposition to sewage discharges
Don't know or other comment (3.3%)	• Comment that additional supplies are needed, or that reducing leakage would reduce frequency of drought restrictions • Opposition to sewage discharges
Blank or no comment (6.6%)	

Summary response to the comments on Question 8

The Table below contains our detailed responses to the comments made in Question 8. We plan to continue to ask our customers to be extra careful with their water use during periods of drought and will introduce restrictions, but only where necessary.

Changes to our plan as a result of the feedback on Question 8

Given the majority of responses supported drought restrictions on water use we have made no change to our strategy in response to feedback on this question.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Support for the plans. They are necessary. No other option. Common sense. Will make people think about saving water and their water use. Necessary to protect the environment. Needs to be combined with education and media campaigns. Part of a necessary balance.	WRMP005 WRMP009 WRMP026 WRMP027 WRMP028 WRMP029 WRMP066 WRMP092 WRMP094 WRMP111 WRMP008 WRMP015 WRMP041 WRMP022 WRMP047 WRMP060 WRMP065 WRMP079 WRMP115 WRMP116 WRMP117 WRMP114 WRMP089 WRMP100 WRMP052 WRMP064 WRMP069 WRMP103 WRMP085 WRMP115 WRMP113 WRMP099 WRMP118	The support for the plans is welcomed, as is the recognition that temporary restrictions are a necessary part of the overall water resources and drought management actions available to Southern Water. Temporary restrictions are only introduced following media and education campaigns encouraging customers to reduce water use ahead of and during a drought. The temporary restrictions are only imposed when absolutely necessary and alongside extensive work by Southern Water to maximise its supplies from existing sources, and to increase its leak fixing as well.
Only if they are absolutely necessary. Comments also that necessary to manage supplies and water resources well in the lead up to droughts so temporary use bans are not brought about due to mis-management. Need to better manage what we have.	WRMP022 WRMP050 WRMP003 WRMP033 WRMP108	
Comments that temporary bans may only have a limited value. Comments about specific business types like car washes and swimming pools. Comments that other abstractors should be similarly restricted - farmers and landowners, golf courses etc must also be covered and enforced if the natural environment is not to be further harmed by drought impacts.	WRMP012 WRMP030 WRMP068 WRMP106	Experience shows that temporary restrictions do have a positive role to play in a drought and that they result in a measurable and significant reduction in demand which is a critical component of safeguarding public water supplies. Restrictions are imposed on both household and non-household customers as part of an escalating process of restrictions as a drought develops and continues to worsen.
Comments that alternative sources of supply need to be explored, including national water grid and other options including more storage. Need to invest in new supplies as well.	WRMP012 WRMP040 WRMP087 WRMP098 WRMP099	The draft WRMP makes clear that the reliance on temporary restrictions in a drought is as well as, and not instead of, significant investment in new water resources.
Needs to be alongside fixing leaks.	WRMP020 WRMP036 WRMP049 WRMP105 WRMP064 WRMP115 WRMP118	The draft WRMP sets out Southern Water's ambitious plans to invest significantly in leakage reduction, building on the reductions achieved to date. This will be implemented alongside wider demand management measures and new resources development.

Themes and issues raised in representations	Defra No.	Company consideration and response
Should be combined with the use of rising block tariffs to increase the price of water, or other means to restrict excessive use.	WRMP069 WRMP078 WRMP083 WRMP112	Over time measures including tariffs may be introduced to provide a financial encouragement (or penalty) for households using high levels of water. There will need to be careful protections for those with medical, care or other needs, and financially vulnerable households.
Comments about poor service to customers and lack of supplies.	WRMP070 WRMP110	There have been a number of recent interruptions to supply in Hampshire, for which Southern Water has apologised and compensated customers. The proposals in the Draft WRMP will make supplies more resilient in the future.
Opposition to water recycling in Havant Thicket.	WRMP084	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water

Themes and issues raised in representations	Defra No.	Company consideration and response
		Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Unsure what this means	WRMP067	The question relates to the introduction of temporary use bans (hosepipe bans) and non-essential use bans (wider restrictions on water use) during a drought.
Comments from respondents who disagreed.		
Comments against the plans, that instead of relying on temporary restrictions Southern Water should manage its resources and invest to make supplies more secure, and fix leaks. Comments also on need for more reservoirs and storage. Comments that if customers pay for water they should be able to use it. Concerns about impacts of restrictions on customers.	WRMP004 WRMP007 WRMP014 WRMP056 WRMP024 WRMP032 WRMP034 WRMP071 WRMP072 WRMP082 WRMP088 WRMP091 WRMP095 WRMP119 WRMP051	The draft WRMP makes clear that the reliance on temporary restrictions in a drought is as well as, and not instead of, significant investment in new water resources. Restrictions on customer water use in a drought include a number of exemptions – including for those with medical, care or other needs.
Fix your leaks first before restricting our use	WRMP010 WRMP013 WRMP016 WRMP018 WRMP055 WRMP076 WRMP109	The draft WRMP sets out Southern Water's ambitious plans to invest significantly in leakage reduction, building on the reductions achieved to date. This will be implemented alongside wider demand management measures and new resources development.
Comments that there isn't another option - what else would Southern Water do? Recognition that as well as investment, some temporary restrictions will be needed.	WRMP031 WRMP057 WRMP090	Temporary restrictions are a necessary part of the overall water resources and drought management actions available to Southern Water. Temporary restrictions are only introduced following media and education campaigns encouraging customers to reduce water use ahead of and during a drought. The temporary restrictions are only imposed when absolutely necessary and alongside extensive work by Southern Water to maximise its supplies from existing sources, and to increase its leak fixing as well.
Opposition to sewage discharges	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release

Themes and issues raised in representations	Defra No.	Company consideration and response
		back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of

Themes and issues raised in representations	Defra No.	Company consideration and response
		increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders

Themes and issues raised in representations	Defra No.	Company consideration and response
		strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
No comment as outside of Southern Water's supply area.	WRMP063	Noted.

1.5. New water sources to provide resilient and sustainable supplies

Our Draft Plan included the development of a number of new supply options to ensure that we can maintain a resilience and sustainable supply of water. These options include building new reservoirs in Oxfordshire and Sussex, water recycling schemes in Hampshire, a desalination plant in Sussex and options to import water from our neighbouring water companies.

The new proposed strategic reservoir in Oxfordshire can be built to store either 100,000 million litres or 150,000 million litres and in addition to supplying water to Affinity Water and Thames Water customers, could supply water to our customers via a strategic transfer to Hampshire. Due to these potential regional connections the size of the reservoir required needs could potentially be related to the size of the water recycling plant we are planning to build in Hampshire. We also have an option to build a reservoir in Sussex with a capacity to provide over 19 million litres per day.

Questions 9 to 15 covered these options.

1.1.9. Question 9: A new strategic reservoir is an integral part of the regional best value plan for the South East. Do you have any comments on the size of the new reservoir?

Of the respondents to the question, approximately 42% said yes they had comments, whilst 44% said they didn't (Figure 4.9, Table 4.9).

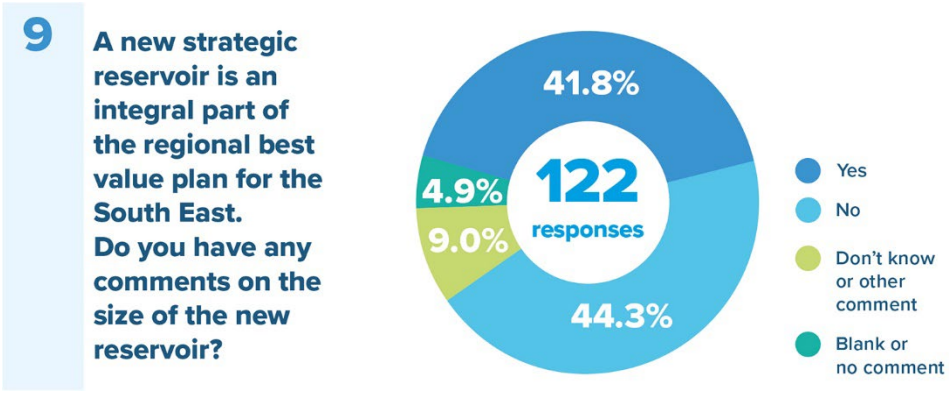

Figure 4.8 Feedback on Question 9.

Table 4.9 Summary of feedback on Question 9.

	Key themes in responses to Question 9
Yes, comments (41.8%)	• Support for making the reservoir larger so that it can maximise its storage • Support for large reservoir storage, but recognition that the detailed impacts of the reservoir are not presented, so it is hard to comment. • Comments that the reservoir should be as small as possible • Concerns that the case for the reservoir had not been made, and/or that transferring water from it to Hampshire is not the best option • Questions why a large reservoir like SESRO is not being developed in Hampshire • Need for more reservoirs, not just SESRO and Havant Thicket • Support for smaller, local solutions • Must not recycle water into reservoirs generally, plus opposition to water recycling into Havant Thicket reservoir
No	• Many respondents said it was not their area or they didn't have comments • Some comments queried the need for and the size of the SESRO proposal

	Key themes in responses to Question 9
(44.3%)	• Number of respondents commented on the Havant Thicket Water Recycling scheme, concerned about its impacts • Opposition to sewage discharges
Don't know or other comment (9.0%)	• Some comments on the links between size of SESRO and size of water recycling plant in Hampshire • Opposition to water recycling into Havant Thicket • Some respondents said it was not their area or they didn't have comments
Blank or no comment (4.9%)	

Summary response to the comments on Question 9

The Table below contains our detailed responses to the comments made in Question 9. We have not pre-determined the size of the reservoir for the Revised Plan. The selection of the reservoir, and its capacity, is based on the same objective criteria that are used for other options. These options are appraised and selected by modelling carried out at a regional level by water resources in the South East (WRSE). The selection of the strategic reservoir and the reasons for this are described in detail in the WRSE regional plan and WRSE Statement of Response.

Changes to our plan as a result of the feedback on Question 9

Since publishing our draft plan we have continued to work with neighbouring companies within WRSE and have provided updates such as revised demand forecasts and changes driven by updated regulatory guidance. The WRSE best value plan modelling has selected a 150,000 million litres capacity variant of the reservoir. This modelling demonstrates that this option is part of the best value plan for Southern Water, Thames Water and the other members of the WRSE.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
General comments on the need for storage reservoirs to be suitably large to help balance droughts, and the need for more reservoirs to help meet future needs. Comments that should not rely on one source of water. Comments about how the reservoirs will be filled.	WRMP003 WRMP005 WRMP056 WRMP032 WRMP033 WRMP050 WRMP072 WRMP099 WRMP112	The scale of new reservoirs takes account of available water supplies to fill them, and the potential space available for their construction, having regard to the construction and operational environmental and other impacts that may arise. Southern Water's WRMP makes clear that a number of new water resources solutions are required, and that there is greater resilience from developing a number of schemes, and in increasing connections within and between water company areas to secure supplies.
Reservoir should be bigger than the one being considered to meet future needs. Comments also that it should be built as soon as possible.	WRMP007 WRMP010 WRMP021 WRMP037 WRMP040 WRMP014 WRMP022 WRMP056 WRMP059 WRMP090 WRMP008	Southern Water, along with the other five water companies in the south east, is working in partnership through WRSE to develop co-ordinated plans for new resources across the region. The timing and final scale of the proposed new reservoir at SESRO is informed by consultation responses to WRMPs and the regional plan, and by updated investment modelling that is being undertaken. The SESRO reservoir proposal remains a critical part of the delivery of sustainable water supplies to the region as a whole, and an important component of Southern Water's own plans.
While the results of the company's analysis show that the SESRO100 performs better than other size configurations in all comparisons, the difference in costs and Best Value metrics between SESRO100 and SESRO150 are modest compared to the additional volume. Given the greater resilience offered by SESRO150 we simply question if this would not in fact be the better option.	WRMP064	
Comments that the reservoir should be as small as possible.	WRMP060	
Comments on the large scale of the proposed SESRO reservoir, and levels of opposition. Concerns about environmental impacts of the scheme. Comments on potential for biodiversity net gain. Other comments support SESRO, but consider open water reservoir not the only solution to consider due to land take and evaporation.	WRMP046 WRMP049 WRMP068 WRMP076 WRMP102 WRMP116 WRMP023	
Support for the planned new reservoir.	WRMP012 WRMP032 WRMP109 WRMP114	The support is noted and welcomed.

Themes and issues raised in representations	Defra No.	Company consideration and response
A large reservoir or two smaller ones in specific areas would be good. Question whether something similar (or a number of reservoirs) could be built in Southern Water's area, in addition to Havant Thicket.	WRMP015 WRMP031 WRMP094 WRMP092	Southern Water has explored potential reservoir options within its own area through an extensive Options Appraisal undertaken for the WRMP. A new reservoir is being promoted in Sussex, however the potential locations for new reservoirs in Hampshire are limited by geological conditions and other environmental designations and constraints. Southern Water is working closely with other water companies promoting new reservoirs in their own WRMPs and has included new transfer proposals so that water from new reservoirs has the potential to be shared between companies, or used to 'free up' other resources that could be made available as new transfers to Southern Water.
Opposition to planned water recycling in Havant Thicket. Concerns about environmental impacts and risks relating to drinking treated wastewater, and comments around trust and confidence in Southern Water. Opposition to water recycling into reservoirs.	WRMP018 WRMP024 WRMP027 WRMP028 WRMP072 WRMP076	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife

Themes and issues raised in representations	Defra No.	Company consideration and response
		We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Comments on the need to fix leaks to solve future water needs.	WRMP018 WRMP055	The draft WRMP sets out Southern Water's ambitious plans to invest significantly in leakage reduction, building on the reductions achieved to date. This will be implemented alongside wider demand management measures and new resources development.
Opposition to building new desalination plants	WRMP041 WRMP068	The potential environmental impacts associated with desalination plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced.
Comments on the details of the Havant Thicket reservoir.	WRMP081 WRMP095 WRMP101	Planning permission has been granted for the Havant Thicket reservoir and this is currently under construction.
Comments about the lack of investment in new resources, and investment should have happened sooner. Comments about the sale of a number of reservoirs.	WRMP086 WRMP087 WRMP098	The WRMP includes significant planned investment in new water resources infrastructure, alongside demand management and leakage reduction measures. A number of service reservoirs have been sold by Southern Water and other water companies – these are older buried storage tanks which are no longer to modern standards or have been superseded by more recently developed alternative storage facilities.
Opposition to sewage discharges	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our

Themes and issues raised in representations	Defra No.	Company consideration and response
		bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop

Themes and issues raised in representations	Defra No.	Company consideration and response
		assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments from respondents who disagreed.		
Comments on the need for the reservoir, the potential for forecasts of need to be wrong, whether this will meet long term needs, and where the water to fill the reservoir will come from.	WRMP082 WRMP109 WRMP034 WRMP004	The scale of new reservoirs takes account of available water supplies to fill them, and the potential space available for their construction, having regard to the construction and operational environmental and other impacts that may arise. Southern Water's WRMP makes clear that a number of new water resources solutions are required, and that there is greater resilience from developing a number of schemes, and in increasing connections within and between water company areas to secure supplies. Southern Water, along with the other five water companies in the south east, is working in partnership through WRSE to develop co-ordinated plans for new resources across the region. The timing and final scale of the proposed new reservoir at SESRO is informed by consultation responses to WRMPs and the regional plan, and by updated investment modelling that is being undertaken. The SESRO reservoir proposal remains a critical part of the delivery of sustainable water supplies to the region as a whole, and an
Strong opposition to the plan for Abingdon reservoir for the detailed reasons set out in response to WRSE, and to Thames Water's WRMP consultation.	WRMP111	

Themes and issues raised in representations	Defra No.	Company consideration and response
		important component of Southern Water's own plans.
Opposition to water recycling in general or in Havant Thicket.	WRMP039 WRMP030 WRMP043 WRMP091	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Comments on the details of the Havant Thicket reservoir currently under construction.	WRMP057 WRMP083 WRMP047	Planning permission has been granted for the Havant Thicket reservoir and this is currently under construction.

Themes and issues raised in representations	Defra No.	Company consideration and response
Not able to comment - including insufficient information, or not in their area.	WRMP067 WRMP079 WRMP085	Comment is noted.
Comments on the potential for the reservoir to be a haven for wildlife, walkers etc.	WRMP071	A number of existing reservoirs in the region provide significant recreational and biodiversity benefits, and with careful planning there is the potential for new reservoirs to do the same.
A new reservoir is required in Kent at Broad Oak but it is understood that this will primarily serve East not West Kent. The size should be informed by relevant planning and cost considerations.	WRMP108	The Broad Oak reservoir forms part of South East Water's WRMP. The timing and scale of that proposal reflects the need for additional water resources within that sub-region.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our

Themes and issues raised in representations	Defra No.	Company consideration and response
		communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comment on the need for Southern Water to bring forward short to medium term measures to secure water supplies given the long term nature of reservoir proposals.	WRMP051	Southern Water's current WRMP (approved in 2019) includes significant additional water resources proposals within the current five year period (2020-2025), and the

Themes and issues raised in representations	Defra No.	Company consideration and response
		period up to 2030, including water recycling, new water transfers, and resilience schemes within the existing water supply network.
Not able to comment - including insufficient information, or not in their area. Comment would wish to be kept informed.	WRMP063 WRMP117	Comment is noted.
Opposition to water recycling in general or in Havant Thicket.	WRMP084	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.

Themes and issues raised in representations	Defra No.	Company consideration and response
Whilst the location of this appears to be outside of the South Downs National Park, there may still be impacts on the setting. We would like to remind Southern Water of its duty to have regard to National Park Purposes, and that National Parks are given the highest level of protection. This extends to wildlife and cultural heritage, as well as natural beauty, and should be taken into account at the earliest possible stage.	WRMP107	The proposed SESRO reservoir is in Oxfordshire and so it is unrelated to the National Park. Southern Water is aware of its duty to have regard to National Park purposes through its WRMP preparation.
Comment it is unclear which reservoir is being referred to in the question.	WRMP113	The question relates to the scale of the SESRO reservoir, proposed in Oxfordshire as part of Thames Water's WRMP and included within the WRSE regional plan.
No specific comments on the size of the reservoir, given the level of doubt with the consultation document itself on the likelihood and timeliness of the reservoir being delivered, we feel that the scale of the reservoir needs to be great enough to both minimise the need for water recycling at Havant Thicket reservoir, and build in some contingency for water supply post the time horizons of the new Water Resources Management Plan.	WRMP118	The comments are noted. Southern Water, along with the other five water companies in the south east, is working in partnership through WRSE to develop co-ordinated plans for new resources across the region. The timing and final scale of the proposed new reservoir at SESRO is informed by consultation responses to WRMPs and the regional plan, and by updated investment modelling that is being undertaken. The SESRO reservoir proposal remains a critical part of the delivery of sustainable water supplies to the region as a whole, and an important component of Southern Water's own plans.

1.1.10. Question 10: Does your position change if the size of that reservoir (which will supply the transfer into Hampshire) impacts on the size of water recycling plant needed at Havant Thicket? (See section seven in our technical document for more information)

Of the respondents to this question, approximately 20% said yes their position changed, whilst 61% said no it didn't (Figure 4.10, Table 4.10).

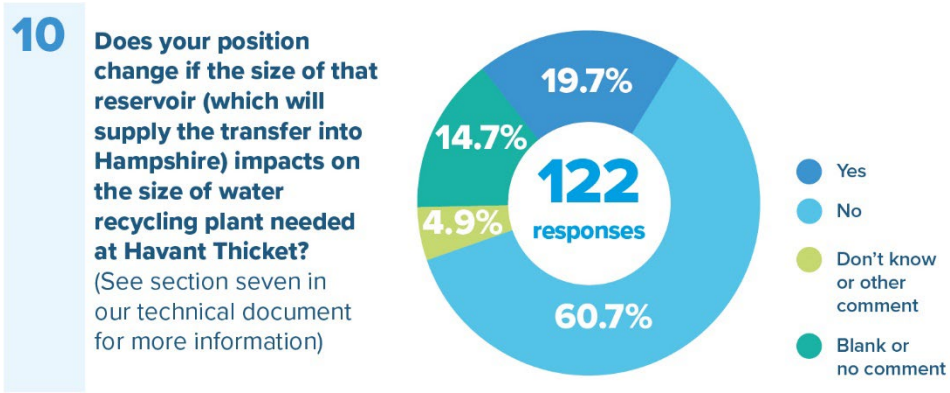

Figure 4.9 Feedback on Question 10.

Table 4.10 Summary of feedback on Question 10.

	Key themes in responses to Question 10
Yes (19.7%)	• Respondents expressed support for the SESRO reservoir if it meant that water recycling into Havant Thicket wasn't required. • Numerous comments raised objections and concerns about the proposed water recycling into Havant Thicket. • Some stated more information was required to comment
No (60.7%)	• Numerous comments raised objections and concerns about the proposed water recycling into Havant Thicket. • Some questioned whether a larger SESRO would result in a smaller water recycling scheme at Havant, or whether both would end up being developed. Issues and concerns around trust were expressed. • Others supported water recycling at Havant and were opposed to SESRO • Some respondents said it was not their area or they didn't have comments
Don't know or other comment (4.9%)	• Concerns that the linkages between the two projects are not clearly enough explained. • Concerns whether water recycling is proven to be an appropriate or the best option at Havat Thicket • Opposition to sewage discharges
Blank or no comment (14.7%)	

Summary response to the comments on Question 10

The Table below contains our detailed responses to the comments made in Question 10.

Following the publication of our Draft Plan, we have carried out further work together with Portsmouth Water to assess the capacities of the water recycling plant at Budds Farm that would best meet the anticipated demand under different planning scenarios.

We used a joint system simulation model that represented our combined supply networks and demand distribution across Hampshire and West Sussex to simulate the potential combined yield of Havant Thicket reservoir by itself and with different combinations of water recycling plant. This assessment has allowed us to refine the Deployable Output for the option and associated conjunctive use benefit by understanding how the reservoir will interact with existing and other potential future supply schemes such as those selected in our draft strategy.

As a result of this work, we introduced three capacities of the water recycling plant (20Ml/d, 40Ml/d and 60Ml/d) which could be selected by the investment modelling to build in a phased manner. We have also, as part of the WRSE regional plan modelling, tested different scales of SESRO reservoir in combination with this Havant water recycling and water transfer option, as part of the overall regional solution.

Changes to our plan as a result of the feedback on Question 10

As discussed in Section 9, the revised preferred strategy based on the updated best value modelling is to build a 150,000 million litres capacity variant of the South East strategic reservoir. In addition, the best value plan requires the Budds farm recycling plant in line with our updated delivery dates. Annex 6 to our SoR provides more details on our Water for Life Hampshire programme.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who said their position would change.		
Comments that the size of the reservoir and size of the water recycling plant need to be of sufficient size to enable them to function appropriately to meet demand.	WRMP006	The size of the reservoir and recycling plant identified in draft WRMPs reflects the sizes selected by detailed modelling as being the most appropriate sized solution to meet future needs as part of the best value plan.
Opposition to water recycling into any reservoirs, and/or to Havant Thicket.	WRMP020 WRMP026 WRMP027 WRMP040 WRMP045 WRMP048 WRMP074 WRMP096 WRMP115 WRMP040 WRMP092	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.

Themes and issues raised in representations	Defra No.	Company consideration and response
		Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Increase reservoir size so water recycling not required at Havant	WRMP038 WRMP040	Southern Water, along with the other five water companies in the south east, is working in partnership through WRSE to develop co-ordinated plans for new resources across the region. The timing and final scale of the proposed new reservoir at SESRO, and the final scale and timing of water recycling in Hampshire is informed by consultation responses to WRMPs and the regional plan, and by updated investment modelling that is being undertaken. The proposals remain a critical part of the delivery of sustainable water supplies to the region as a whole, and an important component of Southern Water's own plans.
Support for building the reservoir, provided this does not encourage people to waste water.	WRMP041	
Concerns that the question implies a larger reservoir at Havant Thicket. Opposition if that is the case.	WRMP089	
Opposition to sewage discharges	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this.

Themes and issues raised in representations	Defra No.	Company consideration and response
		Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017

Themes and issues raised in representations	Defra No.	Company consideration and response
Comment that water recycling plant is not needed if water is conserved intelligently.	WRMP112	The detailed modelling undertaken as part of the preparation of the WRMP shows that demand management measures on their own are insufficient to meet the scale of future water resources need. A combination of demand management and investment in new resources is required.
Other comments, including unsure, not enough information, or not qualified to answer.	WRMP079 WRMP114	Comments are noted.
Comments from respondents who said their position would not change.		
Opposition to water recycling and/or water recycling into Havant Thicket.	WRMP024 WRMP030 WRMP031 WRMP059 WRMP060 WRMP082 WRMP085 WRMP091 WRMP084 WRMP109 WRMP090 WRMP087 WRMP098 WRMP072 WRMP018	Water recycling schemes have been in operation internationally for decades. The earliest examples date back to the 1960s, and in 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest-standing example of a water recycling system is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969, and in 2002 it was replaced with a new, larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of being discharged to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.

Themes and issues raised in representations	Defra No.	Company consideration and response
Opposed to planned new reservoirs.	WRMP004	The scale of water resources challenges being faced means that significant new resources are required in the future. New reservoirs can provide valuable storage of water when there is a surplus, for use in droughts when there is not. This significantly increases the resilience of water supplies for customers.
Comment supporting the larger reservoir	WRMP008 WRMP031	Southern Water, along with the other five water companies in the south east, is working in partnership through WRSE to develop co-ordinated plans for new resources across the region. The timing and final scale of the proposed new reservoir at SESRO, and the final scale and timing of water recycling in Hampshire is informed by consultation responses to WRMPs and the regional plan, and by updated investment modelling that is being undertaken. The proposals remain a critical part of the delivery of sustainable water supplies to the region as a whole, and an important component of Southern Water's own plans.
Other comments on the proposals, including that the size of the water recycling plant needs to be future proofed however and the size of the reservoir should not impact on this. Water recycling takes the pressure off abstraction but is not, in itself, a new source of water as it relies on reusing water originally abstracted elsewhere.	WRMP049 WRMP064	
Comments that experts should determine the appropriate size. Comment questioning if this is a fait accompli?	WRMP057 WRMP067	
No our position does not change. You should go ahead with your planned Havant recycling, making good use of the scarce resource. GARD supports water recycling in general as it is a drought resilient source, unlike a 'strategic' reservoir in an area prone to water shortages at a similar time to Hampshire.	WRMP111	Southern Water's plans for water recycling in Hampshire are a key proposal within the WRMP and regional plan. The proposed SESRO reservoir is also a key proposal in Thames Water's WRMP and the regional plan. Water resources modelling identifies that Southern Water will need to rely on a combination of the two to meet the scale of future challenges being faced in Hampshire.
Rivers and water bodies have always used recycled water in many ways. As long as it is all well-managed it makes sense to use this recycled water resource.	WRMP022	The comments are noted.
Support the need for reservoirs. Comment also that underground storage is needed.	WRMP049 WRMP056 WRMP068 WRMP071	The support for reservoirs is noted. The potential for underground storage has been assessed as part of the Options Appraisal as part of the preparation of the WRMP.
Supply from the SESRO must be separate from and additional to that from Havant Thicket.	WRMP090	The two schemes are separate, and there is no direct connection between the two. Water resources modelling identifies that Southern Water will need to rely on a

Themes and issues raised in representations	Defra No.	Company consideration and response
		combination of the two schemes to meet the scale of future challenges being faced in Hampshire.
Regardless of the size of the strategic reservoir, your plans for Havant Thicket recycling plant are highly unlikely to be reduced, as you will inevitably regard any surplus recycling capacity as fallback in case of change.	WRMP078	The timing and final scale of the proposed new reservoir at SESRO, and the final scale and timing of water recycling in Hampshire is informed by consultation responses to WRMPs and the regional plan, and by updated investment modelling that is being undertaken. This is considering the optimum sizes for each proposal.
Any increase in the size of the recycling plant needed at Havant Thicket would still not be proportionate to the land-take of the proposed SESRO reservoir.	WRMP116	The comment on the land take of the SESRO reservoir proposal is noted.
Comments that the question is unclear, or similar to the previous one, or that insufficient information to answer.	WRMP110 WRMP101	Comment is noted. There is a relationship between the size of the two schemes, which is what the question was seeking responses on. Southern Water will carefully consider the wording of questions for future consultations.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
The case for the Hampshire Water Transfer and Water Recycling Project has not been fully developed. There is a great detail of further work to be undertaken before the next consultation on the project in the summer. There remains uncertainty given the size and timing of the South East Strategic Reservoir which will impact on the size of the water recycling plant needed to serve Havant Thicket. The principle of the need for the water recycling plant at Havant Thicket is therefore questioned.	WRMP053	We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options. Following abstraction license changes in 2019 we faced a ~160Ml/d loss in the amount of water we can supply to Hampshire in a drought. Through our section 20 agreement with the Environment Agency we are currently reliant on environmentally damaging drought permits and orders, which impact the SSSI and SAC designated rivers of the Test and Itchen to meet demand and we have a “best endeavors” obligation to deliver a permanent long term solution and reduce our reliance on these drought measures The Havant Thicket Water Transfer and Water Recycling

Themes and issues raised in representations	Defra No.	Company consideration and response
		Scheme was selected as an alternative Strategic Regional Option to provide our long term water resource solution for Hampshire and is the only option can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We are continuing to work with Portsmouth Water and WRSE to understand and optimise the size of the Water Recycling plant required to address the regions needs through our best value decision making process. We have already ruled out a 75Ml/d desalination scheme promoted in our 2019 WRMP which was intended to partially resolve the supply deficits we face in Hampshire.
It is unclear how the two projects are connected as the Havant Thicket Reservoir and Havant Water Recycling scheme are due to come online 2029-30 whereas the SESRO is not due until 2040, a gap of ten years.	WRMP117	The two schemes are separate, and there is no direct connection between the two. Water resources modelling identifies that Southern Water will need to rely on a combination of the two schemes to meet the scale of future challenges being faced in Hampshire.
The Council remains unconvinced that water recycling is the best option to be explored, particularly when so much treated water is lost through leakages on a daily basis. The scale of the reservoir in Thames Water's catchment which could feed water into Hampshire needs to be at a scale which minimises the need for water recycling at Havant Thicket. On the detail presented in the consultation document, it is difficult to offer more specific comments than this, but the Council would be keen to explore the opportunity to maximise the benefits for Hampshire from the new strategic reservoir.	WRMP118	Southern Water, along with the other five water companies in the south east, is working in partnership through WRSE to develop co-ordinated plans for new resources across the region. The timing and final scale of the proposed new reservoir at SESRO, and the final scale and timing of water recycling in Hampshire is informed by consultation responses to WRMPs and the regional plan, and by updated investment modelling that is being undertaken. The proposals remain a critical part of the delivery of sustainable water supplies to the region as a whole, and an important component of Southern Water's own plans.
Opposition to sewage discharges.	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through

Themes and issues raised in representations	Defra No.	Company consideration and response
		investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop

Themes and issues raised in representations	Defra No.	Company consideration and response
		assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
No idea, or not able to comment / not enough information, or not within local area.	WRMP034 WRMP015 WRMP108 WRMP119 WRMP103 WRMP063 WRMP083 WRMP113	Comments noted.

1.1.11. Question 11: Do you support our strategy to develop new pipelines that will transfer water into our supply area, that is made available through the development of new strategic water sources in other water companies' supply areas?

Of the respondents to this question, approximately 57% supported the strategy, whilst 25% did not. (Figure 4.11, Table 4.11)

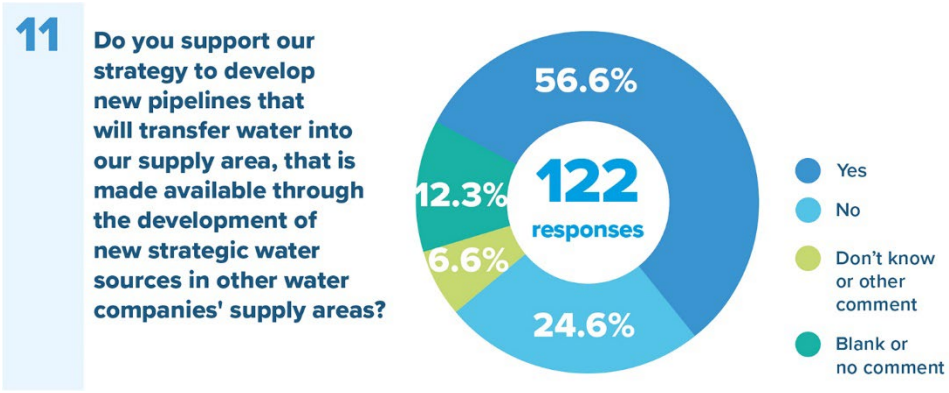

Figure 4.10 Feedback on Question 11.

Table 4.11 Summary of feedback on Question 11.

	Key themes in responses to Question 11
Yes (56.6%)	• Support expressed for the principle of water transfers into Southern Water's area, utilising strategic options in other company areas. • Support, provided the environmental impacts of the strategic options themselves, and the transfers (e.g. carbon, landscape impacts, INNS) are acceptable • Support, but also views expressed that local solutions should also form a key part of the overall strategy, reducing the need for long distance pumping for long transfers • Need to ensure transfers from one area do not leave it with insufficient supplies of its own • Support provided the solutions represent value for money for customers and protect the environment
No (24.6%)	• Comments that Southern Water should develop its own supplies for customers • Opposition expressed to the Havant Water Recycling and Water transfer scheme • Support for fixing leaks before major investment in new resources • Opposition to planned transfer from SESRO to Hampshire • Opposition to sewage discharges
Don't know or other comment (6.6%)	• Comment that leakage and demand management must be prioritised first • Concerns about proposals to use rivers for water transfers, given potential for environmental impacts • Comment that new strategic options and transfers must be designed to high environmental standards • Opposition to sewage discharges
Blank or no comment (12.3%)	

Summary response to the comments on Question 11

The table below contains our detailed responses to the comments made in Question 11. We consider sharing of resources between customers in the South East as a whole to be a more resilient and environmentally sustainable strategy. It allows for movement of water from areas with surplus water to areas of water deficit regardless of the water supplier. This is not always one-way relationship between water companies. In some cases, a water company that imports water from a neighbouring water company initially can later start exporting water to its neighbouring water company as it builds its own resources.

Changes to our plan as a result of the feedback on Question 11

The primary change to our dWRMP that involves bulk transfers from other companies is that the 9Ml/d supply from Portsmouth Water is no longer available in our rdWRMP. We did not preselect any water imports into our supply area apart from those that were part of our WRMP19 deliverables. All bulk transfer options were considered for selection based on the same objective criteria.

Given the generally supportive responses to the use of water transfers we have not made any changes to option availability for the updated investment modelling to derive our revised draft WRMP strategy.

The three key bulk imports that form part of our revised draft preferred strategy are now as follows:

1. A bulk supply of up to 90Ml/d from Havant Thicket reservoir to Hampshire from 2036
2. A bulk supply of up to 50Ml/d from Havant Thicket reservoir to Sussex from 2040
3. A bulk supply of up to 120Ml/d from Thames Water to Hampshire from 2040

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Support for the principle of these transfers. Comments recognising the potential to transfer water in this way. Comments recognising the cost of transferring water long distances, and carbon/energy usage which needs to be minimised. Need for careful co-ordination and close work with planning authorities.	WRMP008 WRMP015 WRMP022 WRMP040 WRMP092 WRMP031 WRMP041 WRMP046 WRMP047 WRMP049 WRMP052 WRMP064 WRMP066 WRMP067 WRMP083 WRMP071 WRMP068 WRMP095 WRMP096 WRMP103 WRMP105 WRMP108 WRMP110 WRMP119 WRMP065 WRMP090 WRMP113 WRMP117 WRMP051 WRMP118 WRMP063	Transfers of water between companies are an important part of our current water resources network and will play an increasingly important role in the future. Whilst there are environmental costs and impacts associated with such transfers, mitigation measures during their construction and operation are capable of being incorporated within the design and implementation of the schemes to make them more acceptable. Southern Water will work closely with other water companies and with local planning authorities over the planning and construction of schemes.
Support for a national water grid	WRMP002 WRMP012 WRMP049 WRMP099	The support for a national water grid is noted. There are no current plans for a national water grid as such, however over time there are increasing connections between regions and companies to enable the sharing of available resources.
Support, but only if transfers do not compromise resources within the original catchment. Comments about water quality of the water being transferred.	WRMP005 WRMP009 WRMP068 WRMP087 WRMP098 WRMP090 WRMP113 WRMP117 WRMP051	Water resources available for transfer must not lead to a deficit in the area providing the water. There is extensive investigation and assessment of potential water quality impacts associated with water transfers, including the composition of the water being transferred and also the potential for invasive non-native species transfers between catchments. The schemes can then be designed to minimise risks relating to these topics.
Opposition to any transfers involving water recycling	WRMP028 WRMP045	Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water

Themes and issues raised in representations	Defra No.	Company consideration and response
		Recycling Project including the evaluation of alternative options.
Support but only it the transfer does not cause damage to landscapes or wildlife, and environmental impacts are minimised. Specific comment on protection afforded to National Parks.	WRMP029 WRMP068 WRMP095 WRMP105 WRMP110 WRMP107 WRMP113 WRMP117 WRMP051 WRMP118 WRMP063	There is extensive investigation and assessment of potential environmental impacts associated with water transfers, both at the WRMP stage, and also in more detail as part of environmental impact assessments associated with applications for planning and other consents. The construction of pipeline transfers can result in temporary impacts during construction but with careful siting and design, and the incorporation of mitigation measures, the long term impacts associated with them can be reduced to acceptable levels. The specific additional protections afforded to National Parks and other designated sites are fully assessed as part of the promotion of individual schemes.
Support but only when necessary. It should be possible to provide water locally if enough local catchment opportunities are found, which would reduce the need for pumping long distances.	WRMP032	The support is noted and welcomed. Water resources are already shared between companies and this is an essential part of providing resilient supplies to customers. There are different levels of available resources within the region and country as a whole, due to geological conditions and weather patterns. The scale of the challenges being faced across the region mean that increased sharing of resources needs to be a core part of the water resources solution.
Comments that investment such as this should have happened already.	WRMP050 WRMP056	
A more local solution would be to develop desalination plants in drought areas.	WRMP099	The draft WRMP includes a number of desalination plants over the medium to longer term, and these options together with water recycling are a necessary part of the plan given the scale of the challenges being faced.
Comments from respondents who disagreed.		
Comments that fixing leaks should be prioritised.	WRMP018 WRMP060 WRMP072	The proposals in the draft WRMP seek to achieve targeted further improvements in leakage reduction, building on what has already been achieved, meeting the Government's targets.

Themes and issues raised in representations	Defra No.	Company consideration and response
Opposition to water recycling and/or water recycling in Havant Thicket.	WRMP020 WRMP076 WRMP084 WRMP078	Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Comments that Southern Water should develop its own solutions and not be dependent on other companies. Comments that accountability will be unclear between companies. Comments that Southern Water seems to be receiving the water, not supplying others.	WRMP057 WRMP079 WRMP084 WRMP094 WRMP109 WRMP030 WRMP078	Water resources are already shared between companies and this is an essential part of providing resilient supplies to customers. There are different levels of available resources within the region and country as a whole, due to geological conditions and weather patterns. The scale of the challenges being faced across the region mean that increased sharing of resources needs to be a core part of the water resources solution. Southern Water currently provides a number of transfers out of its area to other companies, and this will continue under the proposals in the WRMP.
Comment that there is a need to consider environmental impacts and alternatives.	WRMP085 WRMP091 WRMP101	There is extensive investigation and assessment of potential environmental impacts associated with water transfers, both at the WRMP stage, and also in more detail as part of environmental impact assessments associated with applications for planning and other consents. The construction of pipeline transfers can result in temporary impacts during construction but with careful siting and design, and the incorporation of mitigation measures, the long term impacts associated with them can be reduced to acceptable levels.

Themes and issues raised in representations	Defra No.	Company consideration and response
Concerns that transfers may compromise resources within the original catchment. Comments about water quality of the water being transferred.	WRMP021	Water resources available for transfer must not lead to a deficit in the area providing the water. There is extensive investigation and assessment of potential water quality impacts associated with water transfers, including the composition of the water being transferred and also the potential for invasive non-native species transfers between catchments. The schemes can then be designed to minimise risks relating to these topics.
Opposition to sewage discharges	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comment that Southern Water should oppose new housing development until it has sufficient water resources in place.	WRMP072	Southern Water is not a statutory consultee on applications for planning permission, but where consulted Southern Water does provide comments on the water resources and wastewater implications of new housing and other developments.
Irrespective of whether the T2ST is fed by the Abingdon Reservoir or the Severn - Thames Transfer we believe that	WRMP111	The investment modelling undertaken by WRSE for the regional plan and company WRMPs is undertaken on a

Themes and issues raised in representations	Defra No.	Company consideration and response
the T2ST is not good value for money as it does not bring significant benefits for its £800M + capital cost.		least cost and best value basis. The modelling of different adaptive plans and sensitivity tests has identified that the Thames to Southern Transfer (T2ST) is a necessary and important part of the overall regional solution, and provides a significant water resources benefit to Southern Water.
Comment that although inter-regional water transfers are generally to be welcomed where utilising surplus supplies, the wording of this question appears specifically designed to elicit support for water transfer from the proposed SESRO reservoir.	WRMP116	The question is wider than the specific scheme that is highlighted, although the T2ST proposal does form a core proposal in the draft WRMP.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Not sure, or unable to answer the question	WRMP026 WRMP027 WRMP004	Noted.
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing

Themes and issues raised in representations	Defra No.	Company consideration and response
		near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Large infrastructure programmes (reservoirs, transfer schemes etc) should be designed and built to the highest	WRMP120	There is extensive investigation and assessment of potential environmental impacts associated with water

Themes and issues raised in representations	Defra No.	Company consideration and response
environmental standards and maximise the natural capital and amenity benefits of the associated investments. Only the most sustainable options that deliver for the environment and nature rather than damage it should be brought forward. We appreciate that the development of new pipelines to transfer water from other areas could be useful to provide flexibility in the future to better link resource with demand and allow resources to be used more smartly. However, any pipeline would come with its associated environmental impact and cost (both financial and carbon) and therefore must be evaluated against other options for delivery of water sources closer to demand. We are very supportive of greater collaboration between water companies, this should provide greater efficiency and make best use of investment and water resource.		transfers, both at the WRMP stage, and also in more detail as part of environmental impact assessments associated with applications for planning and other consents. The construction of pipeline transfers can result in temporary impacts during construction but with careful siting and design, and the incorporation of mitigation measures, the long term impacts associated with them can be reduced to acceptable levels.

1.1.12. Question 12: Do you agree that water recycling has a role to play in securing water supplies for the future?

Of the respondents to this question, approximately 55% agreed, whilst 32% disagreed (Figure 4.12, Table 4.12).

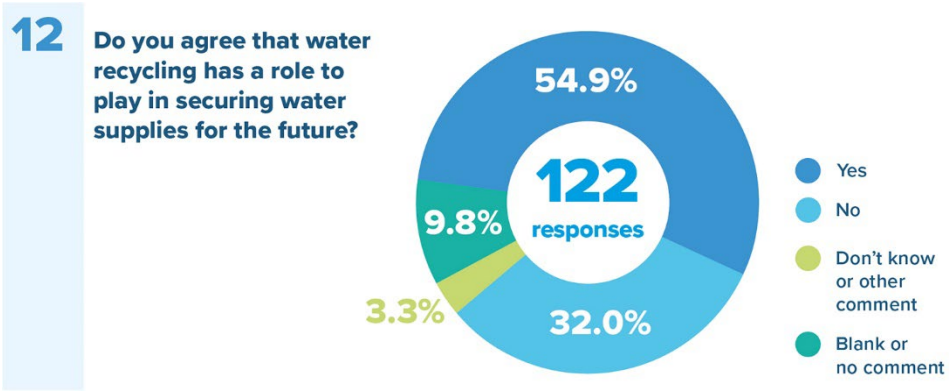

Figure 4.11 Feedback on Question 12.

Table 4.12 Summary of feedback on Question 12.

	Key themes in responses to Question 12
Yes (54.9%)	• Support expressed for water recycling as a necessary part of the overall water resources solution, especially as it reuses water otherwise lost to sea • Recognition of the significant role of water recycling, particularly over medium to long term, but also concern at how many water recycling plants are planned • Concerns whether water treatment infrastructure will guarantee sufficiently high water quality from recycling plants, and how pollution would be prevented • Comments that technology should be capable of making the water very clean, and importance of this for customers • Comments on reputation and trust issues given Southern Water problems with sewage discharges and customer service (secure supplies) • Support, but should not be the main focus – must also develop reservoirs and other solutions • Support for smaller scale water recycling – at a household level for greywater recycling, not just large schemes
No (32%)	• Comments that other (better) options exist, including water storage, and water recycling is not preferred or should be a last resort • Comments that Southern Water should fix leaks and water recycling not then needed • Opposition to drinking water derived from sewage or water recycling • Concerns that treatment does not remove all harmful matter, and reliance on new technologies • Comments on lack of trust for Southern Water to run water recycling schemes, in light of sewage discharges • Concerns about the environmental impacts of the Havant Water Recycling and Water Transfer scheme specifically, including objections to the principle of the scheme • More information needed on water recycling, technologies, risks and impacts
Don't know or other comment (3.3%)	• Concerns about energy use, carbon and environmental impacts • Comments that only to be used as a last resort, with other options preferred first. • Opposition to sewage discharges
Blank or no comment	

	Key themes in responses to Question 12
(9.8%)	

Summary response to the comments on Question 12

The table below contains our detailed responses to the comments made in Question 12. We consider water recycling to play a key role in meeting our future supply challenges, this is alongside reducing leakage and consumption, improving the transfer of water between companies, and constructing new reservoirs. We also recognise the need to continue engaging with our customers and stakeholders as we develop recycling schemes, so that all parties can have confidence that the water produced is of the highest standard.

We have included a separate annex to our Statement of response, annex 6, that specifically addresses many of the concerns around water recycling and in particular the Havant Thicket Water Recycling Scheme

Owing to longer than anticipated delivery programmes we have changed the delivery date of two of our Water Recycling Schemes for our revised draft plan.

- We now forecast that the Littlehampton recycling scheme will be available to provide benefit to our WRMP from **01/04/2030** rather than the draft plan date of 01/04/2028.
- We now forecast that the Hampshire Water Transfer and Water Recycling project will be available to provide benefit from **01/04/2035** rather than the draft plan date of 01/04/2030.

Changes to our plan as a result of the feedback on Question 12

We have not removed any water recycling schemes from our feasible options list and all remain available to the investment modelling for the revised draft plan. However, some of the water recycling schemes will now be delivered to a different timescale than that set out in our draft WRMP. We describe these changes to delivery dates and the reasons for them in our revised draft plan.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Comment supporting water recycling and recognising the potential role it could play in water resources planning, despite costs and potential impacts. Comments on the use of technology to ensure this is safe and that drinking water standards are met. Comments on potential impacts from effluent discharges and the need for investigation and monitoring. Comment that other companies have proposals in their WRMPs.	WRMP006 WRMP009 WRMP015 WRMP022 WRMP046 WRMP049 WRMP050 WRMP052 WRMP056 WRMP063 WRMP064 WRMP065 WRMP066 WRMP079 WRMP109 WRMP068 WRMP105 WRMP115 WRMP111 WRMP108 WRMP119 WRMP071 WRMP031 WRMP012 WRMP103 WRMP113 WRMP095 WRMP092 WRMP117	The support is noted and welcomed. Much of the support expresses some comments and concerns, relating to potential environmental impacts, water quality and drinking water standards. There is extensive investigation and assessment of potential environmental impacts associated with water recycling options, both at the WRMP stage, and also in more detail as part of environmental impact assessments associated with applications for planning and other consents. Southern Water has undertaken detailed investigations of its proposals in Hampshire to date, and further and more detailed studies and assessment are planned ahead of applications for planning and other consents. As well as planning permission, environmental permits for the operation of water recycling plant and associated abstractions and discharge will need to be applied for and secured. In addition, the Drinking Water Inspectorate are fully involved in determining appropriate treatment standards relating to recycling options.
Support but only if quality can be absolutely assured before re-entering the supply system. Concerns about safety. Comments that do not want to drink this water.	WRMP005 WRMP067 WRMP095 WRMP092	
Comment recognising potential for water recycling to provide supplies of water for industry rather than public water supply.	WRMP005	Potential options for water recycling for industrial supply have been considered as part of the Options Appraisal undertaken for the WRMP.
Support and comments on the need for grey water recycling, including in homes, and for businesses. Comments relate to reducing water use and re-using it.	WRMP008 WRMP003 WRMP049 WRMP058 WRMP081 WRMP076 WRMP078 WRMP099	Achieving reduced water use and increased water efficiency is a key part of the proposals in the draft WRMP. Measures including fitting water efficient fittings, and the potential for greywater recycling in some new developments will be explored as part of this work.
Comments on lack of trust and concern at Southern Water's record on water quality and sewage discharges.	WRMP021 WRMP109 WRMP106 WRMP099	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as ‘good’ or ‘excellent’,

Themes and issues raised in representations	Defra No.	Company consideration and response
		with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments that treated sewerage water should continue to be in the sewerage system. Drinking water should continue to be drinking water.	WRMP029 WRMP081	Water recycling involves the re-use of highly treated wastewater, discharged to the environment where it mixes with other water, and then re-abstracted and subjected to further treatment before entering into public water supply. Drinking water and sewage are not mixed.
Support if it means less effluent discharged into rivers and the sea.	WRMP037	Water recycling would partially reduce the volume of effluent discharged to rivers and the sea, but the process of recycling produces waste by products that would require treatment and then discharge.
Support, but opposition to the plans for water recycling into Havant Thicket.	WRMP115	Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.

Themes and issues raised in representations	Defra No.	Company consideration and response
Re-use is worth looking at but make sure you have exhausted your options first as it's expensive, unreliable and you won't have the funding for the long term operation. Comments that alternatives should happen first, including reservoirs, leakage and mains replacement etc. Exhaust all other options before prioritising re-use and desal.	WRMP031	The potential environmental impacts associated with desalination and water recycling plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced. The draft WRMP includes significant demand management and leakage reduction proposals, as well as new resource developments. The balance between desalination and water recycling options in the draft WRMP reflects the availability of potential options of these types, which in turn is dependent on the availability of potential locations where they can appropriately be developed, within environmental constraints.
Support, but to the minimum necessary	WRMP033	
KCC fully supports Southern Water's plans to develop water recycling schemes in several locations across their supply region. Water recycling provides a range of economic, social, and environmental benefits. However, we are surprised with the draft plan's long-term balance between the use of water recycling and desalination given the former's multiple benefits and supply potential for the region, and the latter's financial and environmental (carbon in particular) costs. KCC believes that the potential for water recycling in our region can and should be exploited over the coming decades to a greater extent than currently proposed in the draft plan.	WRMP047	
Comment that this is a question for specialists, or other comment relating to the question wording.	WRMP110 WRMP057	Comments are noted.
In the short term the Littlehampton water recycling scheme early in the plan (2025-2035) uses existing assets so should be "planning neutral". Therefore we welcome the plan to supply the water supply works near Pulborough as it will have a material impact in achieving Water Neutrality in the Sussex North WRZ.	WRMP117	We are continuing to progress this scheme owing to its significant in addressing the Water Neutrality challenge in our Sussex North WRZ. In February 2023 we highlighted a likely extension to the timing of the Littlehampton recycling scheme caused by factors beyond our control, due to planning and consenting risks. The Environment Agency requires longer monitoring to allow discharge consents for this scheme, and may not be able to fast track as the scheme, as it was not identified as a Strategic Resource Option (SRO) at PR19.

Themes and issues raised in representations	Defra No.	Company consideration and response
		It is also likely that delays will also be caused by third party approvals covering planning, EIA and the Habitats Regulations for the pipeline route which must cross a National Park. Our updated programme of delivery for the scheme, which accounted for these delivery risks now suggests a completion date of September 2029. We now forecast that this recycling scheme will be available to provide benefit to our WRMP from 01/04/2030 rather than the draft plan date of 01/04/202. Our revised drat plan will consider the implications to our strategy of this change in timing.
Comments from respondents who disagreed.		
Opposition to water recycling in general and/or water recycling in Havant Thicket. Opposition to water recycling for public supply. Opposed to drinking water that has been sewage. Concerns about the evidence that treatment of wastewater removes everything, including hormones, pharmaceuticals etc. Concerns about safety. Comments about trust in Southern Water. Refusal to drink this water.	WRMP020 WRMP026 WRMP027 WRMP028 WRMP030 WRMP038 WRMP004 WRMP024 WRMP018 WRMP040 WRMP072 WRMP087 WRMP088 WRMP090 WRMP098 WRMP100 WRMP094 WRMP082 WRMP045 WRMP048 WRMP085 WRMP089 WRMP093 WRMP097 WRMP074 WRMP060 WRMP091	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. The proposed full advanced treatment process is an internationally proven robust multi-barrier treatment process capable of removing a broad spectrum of contaminants to

Themes and issues raised in representations	Defra No.	Company consideration and response
		produce a high purity recycled water. We have undertaken a pilot trial using the proposed treatment process at Budds Farm WTW; as part of this trial, an extensive sampling campaign was undertaken to measure concentrations of a large suite of pollutants for the crude sewage, WTW final effluent, and at each stage of the water recycling treatment process. Our pilot plant sampling data has successfully demonstrated the robustness and safety of this process for our specific system. We have conducted an advanced statistical analysis of our pilot plan data to quantify the public health risk associated with the proposed water recycling system. This covers both acute health impacts associated with pathogen exposure, and chronic health impacts associated with chemical exposure (e.g., carcinogens). The findings of this analysis show extremely low health risk posed by the recycled water (benchmarked against WHO standards), even in simulated extreme treatment failure scenarios. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
If recycled water for non-potable use, or for farming/industrial uses completely separate from the domestic water supply would be ok	WRMP038 WRMP040 WRMP060	Potential options for water recycling for industrial supply have been considered as part of the Options Appraisal undertaken for the WRMP.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments that there are better alternatives than water recycling and these should be used instead, including fixing leaks, demand management, creating more storage reservoirs,	WRMP084 WRMP086 WRMP085 WRMP089 WRMP093 WRMP096 WRMP097 WRMP112 WRMP074 WRMP018 WRMP032	The potential environmental impacts associated with water recycling plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced. The draft WRMP includes significant demand management and leakage reduction proposals, as well as new resource developments.
Comment that need more information on water recycling and alternatives before deciding.	WRMP101	
Opposition to sewage discharges	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Comments that other alternatives (leak reduction, reducing water consumption, splitting surface water flows, storage reservoirs) should be prioritised and water recycling only considered if these methods are not sufficient. Further details on the process of water recycling should be provided. Water recycling has a potentially high	WRMP051 WRMP118 WRMP053	The potential environmental impacts associated with water recycling plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced. The draft WRMP includes significant demand

Themes and issues raised in representations	Defra No.	Company consideration and response
environmental impact, is complicated and sensitive with residents		management and leakage reduction proposals, as well as new resource developments.
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment

Themes and issues raised in representations	Defra No.	Company consideration and response
		and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017

1.1.13. Question 13: Our plan has shown we could need a desalination plant in Sussex by 2040 and that more could be needed in the future if we experience high population growth, and we need to reduce how much water we take from sensitive sources. Do you think we should use desalination to provide additional water supplies?

Of the respondents to this question, approximately 50% agreed, whilst 30% disagreed (Figure 4.13, Table 4.13).

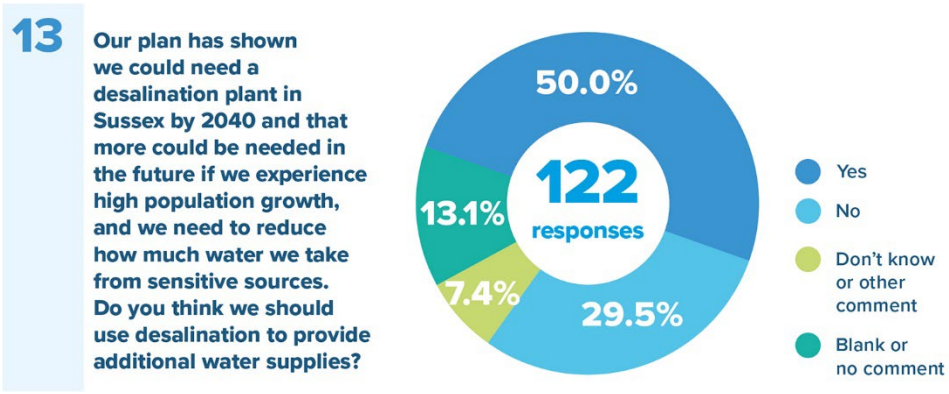

Figure 4.12 Feedback on Question 13.

Table 4.13 Summary of feedback on Question 13.

	Key themes in responses to Question 13
Yes (50%)	• Desalination can provide resilient supplies, and is a sensible option in coastal areas • Yes, but only as part of a mix of options • Agree, but only as a last resort / should pursue other options first • Concerns about cost, carbon and energy used for desalination, and environmental impacts • Preference for water recycling first • Should use renewable energy for the plants, and new technology • Concerns about sewage discharges into the sea
No (29.5%)	• Concerns about environmental impacts • Preference for other options, or other options first • Concern about costs, and impacts on customer bills • Comment that leakage reduction and water efficiency should be prioritised instead • Comment that separating sewage from rainwater would increase supplies instead
Don't know or other comment (7.4%)	• Concerns about energy use, carbon and environmental impacts • Comments that only to be used as a last resort, with other options preferred first. • Desalination should be investigated, but significant concerns remain • Opposition to sewage discharges
Blank or no comment (13.1%)	

Summary response to the comments on Question 13

The Table below contains our detailed responses to the comments made in Question 13.

We are no longer planning to build a desalination plant on the Sussex Coast in 2040 as we have not been able to secure a suitable location for it and this scheme has been removed from our revised draft strategy.

Changes to our plan as a result of the feedback on Question 13

We recognise that there are significant cost and environmental challenges around desalination schemes and that we need to continue work to mitigate potential environmental impacts. Most of the desalination schemes selected in our draft strategy were selected in the mid 2040s and there remains opportunity to further refine these options and to consider modular or combined plants with neighbouring companies to ensure these plans deliver best value benefits for the region.

Given the scale of potential abstraction licence reductions we, and other south east companies are facing in order to reduce abstraction pressure on the regions chalk streams we are likely to continue to need to consider desalination options alongside alternatives, especially under more challenging future pathways as few other options other than water recycling can deliver comparable volumes of water.

Following publication of our draft plan, we have reassessed the costs and delivery timelines for desalination and recycling options in our plan to ensure that they represent our best current estimates.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Support. Comments note that desalination is used in other countries already. Desalination can provide extra resilience. Sensible option in coastal areas. Environmental impacts need to be carefully managed.	WRMP012 WRMP026 WRMP033 WRMP060 WRMP022 WRMP067 WRMP081 WRMP071 WRMP072 WRMP076 WRMP078 WRMP079 WRMP083 WRMP089 WRMP090 WRMP091 WRMP092 WRMP094 WRMP095 WRMP110 WRMP116 WRMP119	The support is noted and welcomed. There is additional technical and environmental assessment work to complete on options as part of the preparation of applications for planning and other consents, including environmental impact assessments.
Yes, but with reservations, or only as a last resort after other alternatives fully explored. Comments include concerns relating to cost, carbon and energy (although newer technologies may reduce this), as well as environmental impacts from discharge of waste products. Comments also query reliability of the plants.	WRMP022 WRMP031 WRMP050 WRMP057 WRMP009 WRMP028 WRMP003 WRMP064 WRMP099 WRMP103 WRMP106 WRMP110 WRMP112	The financial costs and potential environmental impacts associated with desalination plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced. There is additional technical and environmental assessment work to complete on options as part of the preparation of applications for planning and other consents, including environmental impact assessments. Desalination plants are successfully used in various parts of the world and experience from these plants will be used to inform the design and operation of new plants in the UK.
Comments that fixing leaks should be a priority and may be cheaper than desalination.	WRMP009 WRMP036	The proposals in the draft WRMP seek to achieve targeted further improvements in leakage reduction, building on what has already been achieved, meeting the Government's targets. The investment modelling undertaken for the WRMP includes the comparative costings for desalination, leakage reduction and other options.
Opposition to sewage discharges	WRMP028 WRMP076 WRMP089 WRMP094 WRMP106	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health

Themes and issues raised in representations	Defra No.	Company consideration and response
		standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive

Themes and issues raised in representations	Defra No.	Company consideration and response
		control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Support for desalination but not in Hampshire	WRMP029	The draft WRMP does not include any desalination proposals in Hampshire.
While recognising the role of desalination for future supply security, we believe that recycling should be prioritised given the economic and environmental costs associated with desalination and the currently untapped potential of water recycling.	WRMP047	Over the longer term there is a need to rely on both water recycling and desalination options to meet the scale of the water resources challenge being faced. The draft WRMP includes both option types, and there is a focus more on water recycling in the shorter to medium term and then desalination in the longer term.
Comments and opposition to water recycling in Havant Thicket	WRMP057	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is

Themes and issues raised in representations	Defra No.	Company consideration and response
		transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Comments from respondents who disagreed.		
Opposition to desalination. Comments include that desalination is not needed in England, that alternatives need to be pursued first/instead, including fixing leaks and/or reducing water use and developing more storage. Comments that oceans are important environments that need to be protected and concerns that seawater is currently polluted with sewage. Concerns relating to the financial cost, energy use and environmental impacts associated with desalination.	WRMP023 WRMP020 WRMP027 WRMP038 WWRMP066 WRMP107 WRMP013 WRMP018 WRMP109 WRMP032 WRMP068 WRMP074 WRMP087 WRMP098 WRMP096 WRMP101 WRMP113 WRMP115 WRMP084 WRMP088 WRMP002 WRMP037 WRMP055 WRMP008 WRMP085 WRMP019 WRMP049 WRMP082	The financial costs and potential environmental impacts associated with desalination plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced. There is additional technical and environmental assessment work to complete on options as part of the preparation of applications for planning and other consents, including environmental impact assessments. Desalination plants are successfully used in various parts of the world and experience from these plants will be used to inform the design and operation of new plants in the UK.
Comments on the impact of housing growth on water supply needs.	WRMP011	Southern Water works closely with local planning authorities to ensure that its plans for water resources take account of the local authority housing plans.
As operational costs are prohibitive under normal operational and water resource scenarios, how can this be a least cost and best value solution for carbon targets, for the climate, and for the overall environment and customers bills.	WRMP019	Over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced. The operational costs of desalination plants are high, but as part of an overall package of water resource options they have been selected as part of both the least cost and best value plans.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comment that you should not drink desalinated water	WRMP086	There is no evidence to support this comment, and desalinated water is safely drunk currently.
Question whether the significant new water resources needed to deliver environmental benefits of abstraction reduction result in the construction of more massive, costly and more environmentally damaging solutions (e.g. desalination).	WRMP109	The abstraction reductions are necessary to meet Government policy and requirements for delivering environmental improvements and benefits. Whilst new resource options will have environmental impacts, the detailed investigation and assessment of those options as part of the preparation of applications for planning and other consents will inform the design and mitigation of impacts to acceptable levels.
Comments on wastewater treatment and water recycling.	WRMP024 WRMP041	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife.
Opposition to sewage discharges	WRMP062 WRMP066	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our

Themes and issues raised in representations	Defra No.	Company consideration and response
		bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive

Themes and issues raised in representations	Defra No.	Company consideration and response
		control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Desalination is an option to be considered to provide additional water supplies in the future. However, consideration will need to be given in terms of the technology used for the plant, the environmental impact of desalination, energy and carbon use and the cost to customers. Need to engage early with planning authorities.	WRMP051 WRMP052 WRMP117 WRMP118	The financial costs and potential environmental impacts associated with desalination plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced. There is additional technical and environmental assessment work to complete on options as part of the preparation of applications for planning and other consents, including environmental impact assessments. Desalination plants are successfully used in various parts of the world and experience from these plants will be used to inform the design and operation of new plants in the UK.
Comment that the need for a balance between reducing water demand and new water supplies is understood, however, if water is managed properly and not wasted, this would significantly reduce the need to secure new water supplies. More focus is needed on rainwater capture,	WRMP017 WWRMP117 WRMP118	The draft WRMP incudes significant investment in reducing leaks and water use through demand management measures, however the scale of the water resources challenge being faced means that new water resource options are also required. Over the medium to

Themes and issues raised in representations	Defra No.	Company consideration and response
attenuation of water, reduction of leaks, prevention of water contamination and better education.		long term options such as desalination are needed to meet the scale of challenges being faced.
Neither yes or no. Not sure. Would like more information.	WRMP030 WRMP061	Comment noted.
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
No comments, or not in area affected.	WRMP063	Comment noted.

1.1.14. Question 14: Our plan has identified the need for a new reservoir to store water in West Sussex. Do you think we should investigate this further to establish whether it could provide a new source for the area?

Of the respondents to the question, approximately 71% agreed, whilst 10% disagreed (Figure 4.14, Table 4.14).

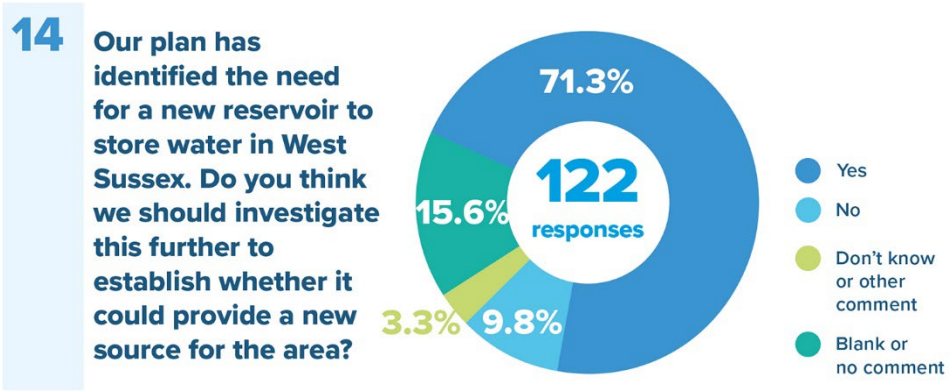

Figure 4.13 Feedback on Question 14.

Table 4.14 Summary of feedback on Question 14.

	Key themes in responses to Question 14
Yes (71.3%)	• Support for this new reservoir, and comments that others should be developed too • Support for providing more storage to maximize use of existing resources • Concerns that environmental impacts need to be assessed • Comments that reservoirs can provide recreation and other benefits • Comment that no reservoirs should be filled with recycled water • Suggestion that more smaller schemes should be pursued
No (9.8%)	• Concerns about impact of reservoir on local area, given existing development pressures • Question how it would be filled • Comments that reservoirs are not sustainable
Don't know or other comment (3.3%)	• Support for leakage reduction and demand management first • Concern at environmental impacts • Query whether the reservoir will adversely impact on planned housing developments in the area • Opposition to sewage discharges
Blank or no comment (15.6%)	

Summary response to the comments on Question 14

The table below contains our detailed responses to the comments made in Question 14. Building a reservoir in Sussex remains part of our plans for securing resilient supplies for our customers. We will be carrying out further work to assess its feasibility.

Changes to our plan as a result of the feedback on Question 14

We acknowledge the broad level of support for the Arun Valley Reservoir scheme and have retained this option for potential selection in the investment modelling for the revised draft plan.

The reservoir is intended to be delivered alongside our leakage and demand strategy

In view of the investigative work we need to carry out the feasibility and deliverability of a reservoir in Sussex, we have pushed back earliest availability of the reservoir to 2037-38 to provide more time for us to undertake the work and confirm in detail the feasibility of the option.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Support for the proposal in the plan. Comments include support for new reservoirs and/or preference for them ahead of other options, support for further investigation of the option and consideration of environmental impacts, comments that there is the potential for biodiversity and recreation benefits, comments about impacts on residents and costs for customers.	WRMP003 WRMP005 WRMP006 WRMP008 WRMP012 WRMP019 WRMP022 WRMP028 WRMP032 WRMP033 WRMP037 WRMP045 WRMP046 WRMP061 WRMP047 WRMP048 WRMP049 WRMP064 WRMP060 WRMP067 WRMP076 WRMP079 WRMP083 WRMP088 WRMP089 WRMP090 WRMP094 WRMP103 WRMP109 WRMP113 WRMP101 WRMP119 WRMP065 WRMP068 WRMP085 WRMP092	The support for the proposal in the WRMP is welcomed. There is a need for further investigation of this option, and Southern Water will work closely with its regulators, consultees and stakeholders as it undertakes this work.
Comment that reducing demand and fixing leaks should be a higher priority.	WRMP018 WRMP017 WRMP101	The draft WRMP incudes significant investment in reducing leaks and water use through demand management measures, however the scale of the water resources challenge being faced means that new water resource options are also required. Over the medium to long term options such as desalination are needed to meet the scale of challenges being faced.
Comments on Havant Thicket reservoir, including how this proposal relates to that reservoir.	WRMP033 WRMP057 WRMP087 WRMP098	The two schemes are separate, and there is no direct connection between the two. Water resources modelling identifies that Southern Water will need to rely on both schemes to meet the scale of future challenges being faced. The Havant Thicket reservoir has planning permission and is under construction. The proposed reservoir in West Sussex is at an early stage of investigation and is a longer term proposal.
Comments opposed to water recycling into reservoirs.	WRMP059 WRMP066 WRMP068 WRMP085	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek,

Themes and issues raised in representations	Defra No.	Company consideration and response
		Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Comments relating to the need for the reservoir, its timing, and delivery	WRMP050 WRMP095	The investment modelling undertaken by WRSE for the regional plan and company WRMPs is undertaken on a least cost and best value basis. The modelling of different adaptive plans and sensitivity tests has identified that the reservoir option is a necessary and important part of the overall regional solution, and provides a significant water resources benefit to Southern Water. There is a need for further investigation of this option, and Southern Water will work closely with its regulators, consultees and stakeholders as it undertakes this work. This will include further engagement with the local planning authorities.
At this stage it is difficult to provide effective comment and feedback as the precise location and timescales for the implementation of the scheme are not fully understood. According to the WRSE regional plan this proposed reservoir is not scheduled to come online until 2046. However we suggest the initial hydrogeological groundwork be undertaken to establish if the reservoir is actually feasible. This initial work should be done sooner in the plan (2025-2035) and if it is not deliverable then resources could then be spent investigating other sources. As local planning authorities it is important that we have early sight of any reservoir location in order to	WRMP117	

Themes and issues raised in representations	Defra No.	Company consideration and response
factor this in to our business activities including local plan making as appropriate.		
Comments that a number of reservoirs have been sold off.	WRMP078	A number of service reservoirs have been sold by Southern Water and other water companies – these are older buried storage tanks which are no longer to modern standards, or have been superseded by more recently developed alternative storage facilities.
Comment that the reservoir should be on a brownfield site	WRMP081	At this stage it appears that there is a lack of available brownfield sites of sufficient scale to accommodate the scale of reservoir required, within proximity of the available water for the reservoir. Appropriate sites will be investigated through the further work that is planned.
Comments from respondents who disagreed.		
Comments that reservoirs are not needed or should not be part of the proposed solution. Comments questioning how it would be filled.	WRMP004 WRMP023 WRMP072	The investment modelling undertaken by WRSE for the regional plan and company WRMPs is undertaken on a least cost and best value basis. The modelling of different adaptive plans and sensitivity tests has identified that the reservoir option is a necessary and important part of the overall regional solution, and provides a significant water resources benefit to Southern Water. The reservoir will be filled by abstracting water from nearby river when there is water available within it for storage. There is a need for further investigation of this option, and Southern Water will work closely with its regulators, consultees and stakeholders as it undertakes this work. This will include further engagement with the local planning authorities. Appropriate sites will be investigated through the further work that is planned.
New reservoirs are not part of the sustainable solution to our region's needs.	WRMP023	
Concern that there is a lack of information on what the investigation is, nor the timeline, and that this could be delaying investment to protect customers supplies	WRMP082	
Comment that the new reservoir would involve an unacceptably large land-take in an area that is already under great pressure to accommodate a range of land uses (including new housing as well as farming and nature).	WRMP116	
Opposition to water recycling into reservoirs.	WRMP030	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest

Themes and issues raised in representations	Defra No.	Company consideration and response
		standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Opposition to sewage discharges	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow

Themes and issues raised in representations	Defra No.	Company consideration and response
		by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect

Themes and issues raised in representations	Defra No.	Company consideration and response
		Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Support for investment in fixing leaks and the existing infrastructure ahead of or instead of building new supplies.	WRMP027 WRMP120	The proposals in the draft WRMP seek to achieve targeted further improvements in leakage reduction, building on what has already been achieved, meeting the Government's targets. The scale of the challenge being faced means that both demand management and new resource developments are required.
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our

Themes and issues raised in representations	Defra No.	Company consideration and response
		communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
No comments as not in area affected.	WRMP063	Comment is noted.
All options to provide new water sources have the potential to do considerable environmental damage. However, in	WRMP120	The investment modelling undertaken by WRSE for the regional plan and company WRMPs is undertaken on a

Themes and issues raised in representations	Defra No.	Company consideration and response
general, reservoirs represent a lower carbon option compared with desalination and water recycling and if carefully sited have the potential to deliver multiple benefits for people and nature. Therefore, we are supportive of exploring the potential for providing a reservoir in West Sussex. As part of any future reservoir proposals options to enhance the wetted environment and deliver enhancement for species and habitats should be incorporated and designed and built to the highest environmental standards.		least cost and best value basis. The modelling of different adaptive plans and sensitivity tests has identified that the reservoir option is a necessary and important part of the overall regional solution, and provides a significant water resources benefit to Southern Water. The reservoir will be filled by abstracting water from nearby river when there is water available within it for storage. There is a need for further investigation of this option, and Southern Water will work closely with its regulators, consultees and stakeholders as it undertakes this work. This will include further engagement with the local planning authorities, and appropriate engagement with potentially affected landowners.
Comment from developer with an interest in land that is being promoted for residential-led mixed use development through the Horsham District and Mid-Sussex District local plan reviews. This reservoir has the potential to impact their current draft local plans. The developer (Berkeley) highlighted concerns over the lack of detail published within the draft WRMP. An indicative location for the reservoir has not been identified, nor the details of any associated infrastructure (pipelines). Further engagement with Southern Water is requested. The potential for the reservoir to provide new leisure and recreational facilities and biodiversity net gain is noted.	WRMP121	

1.1.15. Question 15: Do you think we should look at water recycling options where water is stored in reservoirs, lakes or other waterbodies as well as those where it is released back into nearby rivers and abstracted again?

Of the respondents to the question, approximately 55% agreed, whilst 30% disagreed (Figure 4.15, Table 4.15).

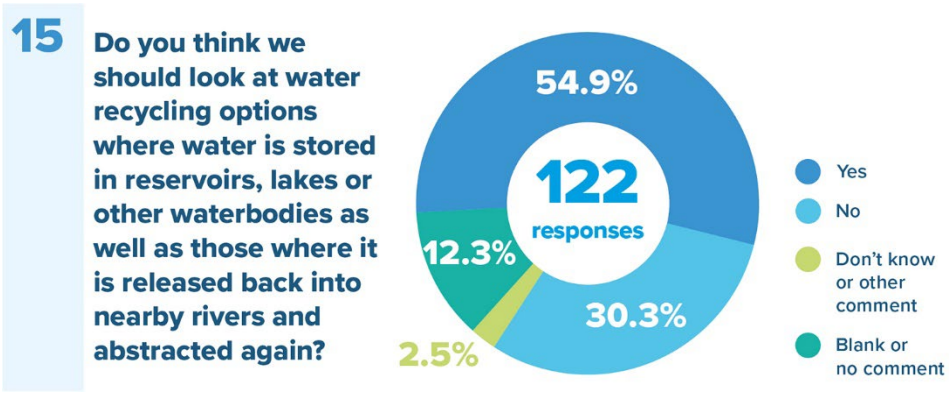

Figure 4.14 Feedback on Question 15.

Table 4.15 Summary of feedback on Question 15.

	Key themes in responses to Question 15
Yes (54.9%)	• All options need to be considered, and this could top up lakes or reservoirs • Support in principle, but more details and reassurance on environmental impacts needed • Should be fresh water and not sewage, and must be safe • Need to consider all potential impacts, recreation, fishing and environmental effects • Should be looked at, but needs lots of investigation before being considered • Support, but concerns that rivers etc are already polluted and this could worsen things
No (30.3%)	• Opposition to recycling water into Havant Thicket reservoir • Concern about impacts on drinking water quality and need to buy bottled water instead • Should only be as an emergency option, or to provide supplies to agriculture • Comments about lack of trust and failure to treat to high enough standards • Concerns about lack of understanding of potential future hazards / new technology • Concerns about environmental impacts • Need to explore all other options first
Don't know or other comment (2.5%)	• Comment that Southern Water is already exploring this. • Question not understood
Blank or no comment (12.3%)	

Summary response to the comments on Question 15

The Table below contains our detailed responses to the comments made in Question 15.

Two of our WRMP19 recycling options, Littlehampton in Sussex (via the Western Rother) and Sandown WTW on the IoW (via the Eastern Yar) use rivers as environmental buffers for water recycling schemes.

All the other the water recycling options in our Revised Plan involve storing water in a lake or reservoir before it is re-treated and put into supply.

Changes to our plan as a result of the feedback on Question 15

We have retained our two WRMP19 Recycling schemes that include rivers as environmental buffers (Littlehampton and Sandown) in our revised draft strategy.

All other water recycling options that included direct discharge of recycled water into a river for re-abstraction further downstream have been excluded from the Revised Plan. The primary reason for this was to reduce the potential for negative environmental impacts on designated affected rivers (for example the Woolston WTW scheme on the River Itchen).

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Support for exploring all potential options. Comments include the need to ensure water quality not affected, and the environment is protected. Comment that more work to increase public understanding is needed, and to ensure that public health is protected. Comments that maximum use of existing supplies and storage should be used first. Comments on the need for engagement with local planning authorities, and full investigation of options and potential impacts.	WRMP006 WRMP012 WRMP076 WRMP019 WRMP022 WRMP032 WRMP036 WRMP037 WRMP041 WRMP047 WRMP050 WRMP051 WRMP064 WRMP065 WRMP066 WRMP067 WRMP068 WRMP078 WRMP092 WRMP096 WRMP105 WRMP111 WRMP116 WRMP117 WRMP118 WRMP119 WRMP113 WRMP063 WRMP089 WRMP099 WRMP102 WRMP108 WRMP103 WRMP071	The support for exploring water recycling options is welcomed. The modelling of different adaptive plans and sensitivity tests has identified that water recycling options are a necessary and important part of the overall regional solution, and have the potential to provide a significant water resources benefit to Southern Water. Southern Water has been undertaking extensive work on its water recycling option in Hampshire, undertaking customer research and consulting on its plans. It has also developed a pilot plant to enable the treatment technology to be tested. For all water recycling plant proposals there is a need for an extended period of investigation and assessment ahead of applications for planning and other consents, and engagement with local planning authorities, and other stakeholders including local communities and customers.
Support for use of lakes and reservoirs, less for rivers.	WRMP015	The investigation of individual options includes significant assessment of the potential impacts on water environments from abstractions and discharges of the recycled water and waste by-products of the treatment process. As with all abstractions and discharges, these are controlled under Environmental Permits which are determined by the Environment Agency following a rigorous application and assessment process.
Comment on the need for more regulation on those who pollutes rivers, and concerns that water should not be abstracted from rivers.	WRMP008 WWRMP083	
Opposition to sewage discharges, or recycling involving sewage. Concerns relating to potential impacts on Havant Thicket reservoir.	WRMP029 WRMP048 WRMP067 WRMP096 WRMP057	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water

Themes and issues raised in representations	Defra No.	Company consideration and response
		recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Comments of support for below ground storage.	WRMP049 WRMP071	The potential for underground storage has been assessed as part of the Options Appraisal as part of the preparation of the WRMP.
Request for more information	WRMP003	More information on the water recycling proposals is available on Southern Water's website www.southernwater.co.uk
Comments from respondents who disagreed.		
Opposition to plans for water recycling. Comments include public opposition, lack of trust, it should not be based on using wastewater, opposition to drinking the water that is produced, concerns at environmental impacts on reservoirs and rivers, concerns about financial cost, there are better options/all other options should be used instead.	WRMP004 WRMP021 WRMP024 WRMP045 WRMP100 WRMP018 WRMP026 WRMP027 WRMP028 WRMP033 WRMP060 WRMP072 WRMP073 WRMP079 WRMP082 WRMP084 WRMP085 WRMP097 WRMP099 WRMP112 WRMP030 WRMP033 WRMP028	The modelling of different adaptive plans and sensitivity tests has identified that water recycling options are a necessary and important part of the overall regional solution, and have the potential to provide a significant water resources benefit to Southern Water. Southern Water has been undertaking extensive work on its water recycling option in Hampshire, undertaking customer research and consulting on its plans. It has also developed a pilot plant to enable the treatment technology to be tested. For all water recycling plant proposals there is a need for an extended period of investigation and assessment ahead of
Recycled and desalinated waters should only be used in agriculture.	WRMP040	

Themes and issues raised in representations	Defra No.	Company consideration and response
		applications for planning and other consents, and engagement with local planning authorities, and other stakeholders including local communities and customers. Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
More reservoirs should be developed. Rainfall should be captured and used to refill reservoirs instead.	WRMP087 WRMP098 WRMP090	The WRMP includes options to develop a new reservoir in West Sussex and options considered in the Options Appraisal for the WRMP included other new reservoirs and increasing the size of existing ones. Southern Water's WRMP makes clear that a number of new water resources solutions are required, and that there is greater resilience from developing a number of schemes, and in increasing connections within and between water company areas to secure supplies.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments that leakage reduction and demand management should be pursued instead.	WRMP094	The draft WRMP sets out Southern Water's ambitious plans to invest significantly in leakage reduction and demand management measures. In order to meet the scale of water resources challenge being faced, new resources developments are required alongside this leakage and demand management investment.
Opposition to sewage discharges	WRMP035 WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows.

Themes and issues raised in representations	Defra No.	Company consideration and response
		Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comment that more information is required.	WRMP101	More information on the water recycling proposals is available on Southern Water's website www.southernwater.co.uk
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Opposition to water recycling in Havant Thicket.	WRMP095	We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.

Themes and issues raised in representations	Defra No.	Company consideration and response
Question not understood	WRMP110	Comment is noted. Southern Water will carefully consider the wording of questions in future consultations.

1.1.16. Question 16: Do you have any additional comments on any of the schemes we have proposed in our draft plan?

Of the respondents, 36% said yes they had other comments on schemes, 42% said they did not (Figure 4.16, Table 4.16).

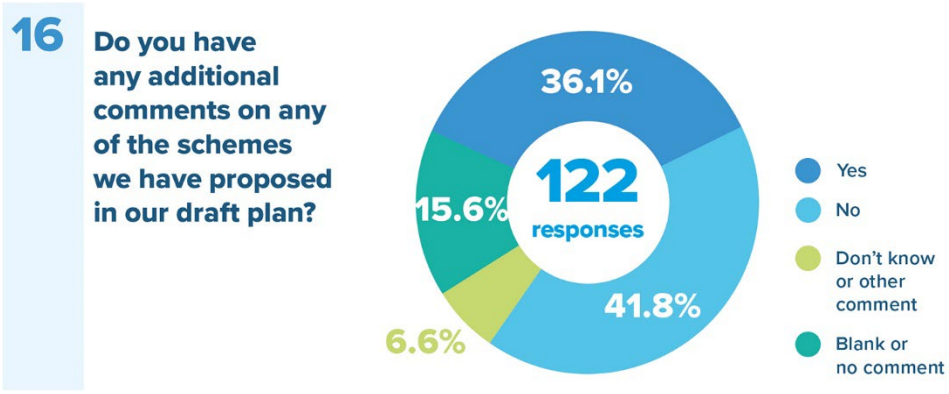

Figure 4.15 Feedback on Question 16.

Table 4.16 Summary of feedback on Question 16.

	Key themes in responses to Question 16
Yes (36.1%)	• Objections and detailed comments against planned water recycling into Havant Thicket reservoir, and concerns about water recycling in general • Concerns about treatment technologies reliability, and environmental impacts from waste products • More emphasis on water efficiency, including potential for tariffs (e.g. customer cashback) • Greater emphasis on leakage reduction • Support for abstraction reductions • Support for more water storage, including underground (ASR) • Promote the separation of surface water from wastewater – reducing flows to sewage works, and providing valuable additional water to store and use • Concerns that 'hard' engineering schemes are unsustainable and natural solutions should be planned instead • Need to engage with local planning authorities on the location and details of potential schemes, and local communities • Opposition to sewage discharges • Comments on trust and motivation of water companies to make profits for shareholders
No (41.8%)	
Don't know or other comment (6.6%)	
Blank or no comment (15.6%)	

Summary response to the comments on Question 16

The Table contains our detailed responses to the comments made in Question 16.

There are a wide range of comments made in response to this question, but they generally raise issues already covered under other questions, as opposed to raising comments on other options.

Changes to our plan as a result of the feedback on Question 16

Changes to the plan are set out in Section 8. No changes have been made specifically in response to the comments on Question 16.

Annexes 5 and 6 of our statement of response contains further detailed responses to representations around the Hampshire Water Transfer and Water Recycling Scheme.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who had additional comments.		
Comments on the need to tackle leaks and promote water efficiency. Comments on the potential for incentives to encourage customers to save water, and the use of tariffs. Support for rainwater storage and nature based solutions instead of hard infrastructure solutions.	WRMP008 WRMP009 WRMP112 WRMP017 WRMP050 WRMP051 WRMP068 WRMP082 WRMP087 WRMP090 WRMP104	The draft WRMP includes significant leakage reduction and demand management measures, building on savings achieved to date. The plan commits to achieving significant further reductions in water use and leakage alongside the development of new resources. The scale of the challenge being faced means that a combination of options is needed, including additional storage, water transfers and catchment and nature based solutions.
Opposition and comments on water recycling, including into Havant Thicket - including that the name hides that this is recycled final sewage effluent, that this form of water reuse is unacceptable, that people don't want to drink water produced this way, concerns about chemicals and public health. Comments about adverse impacts on Havant Thicket reservoir arising from water recycling, including on recreational use, biodiversity, water quality	WRMP018 WWRMP032 WRMP039 WRMP043 WRMP041 WRMP029 WRMP067 WRMP079 WRMP080 WRMP081 WRMP027 WRMP033 WRMP072 WRMP084 WRMP087 WRMP089 WRMP090 WRMP093 WRMP094 WRMP024 WRMP057 WRMP062 WRMP097 WRMP098 WRMP101 WRMP114	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. The proposed full advanced treatment process is an internationally proven robust multi-barrier treatment process capable of removing a broad spectrum of contaminants to produce a high purity recycled water. We have undertaken a pilot trial using the proposed treatment process at Budds Farm WTW; as part of this trial, an extensive sampling campaign was undertaken

Themes and issues raised in representations	Defra No.	Company consideration and response
		to measure concentrations of a large suite of pollutants for the crude sewage, WTW final effluent, and at each stage of the water recycling treatment process. Our pilot plant sampling data has successfully demonstrated the robustness and safety of this process for our specific system. We have conducted an advanced statistical analysis of our pilot plan data to quantify the public health risk associated with the proposed water recycling system. This covers both acute health impacts associated with pathogen exposure, and chronic health impacts associated with chemical exposure (e.g., carcinogens). The findings of this analysis show extremely low health risk posed by the recycled water (benchmarked against WHO standards), even in simulated extreme treatment failure scenarios. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Comments that the consultation and questions is hard for people to engage with and respond to. Concerns that the answers won't be listened to. Comments that the published information is hard to understand and impacts on customer bills unclear.	WRMP028 WRMP057 WRMP004 WRMP064	Southern Water has published non-technical and technical documentation as part of the draft WRMP consultation. It has endeavoured to explain information in an accessible way, but it will carefully consider the feedback received and take this into account for future consultations.

Themes and issues raised in representations	Defra No.	Company consideration and response
Opposition to sewage discharges	WRMP035 WRMP037 WRMP062 WRMP067 WRMP012 WRMP072 WRMP104 WRMP108 WRMP109	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at

Themes and issues raised in representations	Defra No.	Company consideration and response
		our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Support for water recycling in Havant Thicket.	WRMP037	The support is noted and welcomed.
Comments of support for the proposals in the draft WRMP. Need to now deliver. Support for least regret schemes and early action.	WRMP047 WRMP046 WRMP113	The support is noted and welcomed.
Comments about lack of adequate investment or action to date, shareholders profits and dividends, and trust.	WRMP048 WRMP078 WRMP027 WRMP046 WRMP050 WRMP060 WRMP082 WRMP072 WRMP087 WRMP098 WRMP097 WRMP104 WRMP108 WRMP109 WRMP114	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to

Themes and issues raised in representations	Defra No.	Company consideration and response
		recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Comments on the need to engage early and directly with local planning authorities on individual schemes.	WRMP052	Southern Water is committed to engaging early with relevant local planning authorities on individual schemes, and has commenced this engagement for schemes programmed early in the WRMP planning period. Wider stakeholder engagement with other consultees is also being undertaken.
We wish to be kept informed of developments as the plan progresses.	WRMP117	
Concerns relating to desalination proposals in the plan.	WRMP082	The financial costs and potential environmental impacts associated with desalination plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced. There is additional technical and environmental assessment work to complete on options as part of the preparation of applications for planning and other consents, including environmental impact assessments. Desalination plants are successfully used in various parts of the world and experience from these plants will be used to inform the design and operation of new plants in the UK.
Support Southern Water's proposed abstraction reductions from chalk groundwater and chalk streams to support the recovery of these precious habitats, and urge Southern Water to follow the highest level of environmental ambition and at pace. However, even under the "high" ambition scenario these abstraction reductions will not begin until 2035. We understand that investigations to understand the flow implications of different abstraction reduction scenarios are needed, but decisions on further licence	WRMP113	We are currently undertaking environmental investigations into the majority of our surface and groundwater abstractions, in collaboration with the Environment Agency, Natural England, and catchment stakeholders. These investigations will be completed by 2027 and will provide a robust evidence base to inform future abstraction licensing. Our abstraction reductions through our Environmental Ambition will be phased in from 2030 and will continue

Themes and issues raised in representations	Defra No.	Company consideration and response
reductions to meet the needs of the environment should be made by 2030, along with river restoration activities required to make the most of the flow available during dry periods.		through to 2050. These reductions are designed to meet flow or other environmental targets agreed with regulators and catchment stakeholders. In implementing licence reductions, we need to balance our ability to reduce abstraction while replacing lost supplies and maintaining the level of resilience we need to provide our customers against drought. We will continue to work with the Environment Agency, Natural England, and WRSE to explore how we can prioritize and bring forward licence reductions, especially in high priority catchments, as early as possible in line with updated Water Resource Planning Guidance.
The draft plan downplays the opportunities for underground storage afforded by aquifers, conflating ASR schemes which involve developing additional underground storage - for which it is claimed that 'there are limited locations where it can be used because it requires specific ground conditions' - with MAR schemes which merely involve replenishing groundwater sources from rivers etc, notwithstanding the extent of the downland where aquifers may be found.	WRMP116	The potential for underground storage has been assessed as part of the Options Appraisal as part of the preparation of the WRMP. There are, as noted, limited opportunities for ASR due to geological conditions, but the potential for ASR and MAR has been investigated and an MAR scheme in Hampshire was included in the draft WRMP. Annex 8 specifically addresses representations around wider use of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR) schemes.
Comment that rationalisation (not necessarily nationalisation) of the current number of water companies is necessary.	WRMP002	This is outside the scope of the WRMP consultation.
The Council would like to understand where any proposed new reservoir supplying the Rochester supply works would be, and if it would be in Maidstone Borough.	WRMP119	Southern Water will contact the Council directly to discuss this comment further.
No additional comments.	WRMP118 WRMP111	Noted.

1.6. A network that can move water around the region

Our Draft Plan included options for us to share supplies with Portsmouth Water, SES Water, South East Water and Thames Water. These are in addition to the agreements we currently have in place with these companies and require additional infrastructure to be developed. Question 17 in the questionnaire asked if this was an acceptable approach.

1.1.17. Question 17: Do you agree that we should develop our pipeline network so we can move more water between our supply areas and share supplies with our neighbouring water companies?

Of the respondents to the question, approximately 65% agreed, whilst 20% disagreed (Figure 4.17, Table 4.17).

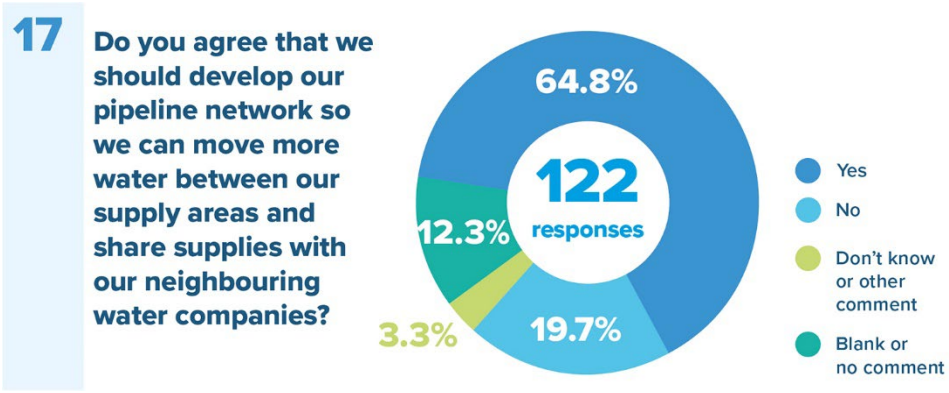

Figure 4.16 Feedback on Question 17.

Table 4.17 Summary of feedback on Question 17.

	Key themes in responses to Question 17
Yes (64.8%)	• Support for water sharing between areas and water companies, and increased resilience • Comments that with different companies supplying parts of the south east, this is essential • Comments that water sharing must not leave the donor area short of water • Concerns about the cost/benefit of long distance transfers, and environmental impacts from disruptive pipeline installation • The environmental impact of new schemes shouldn't be worse than the benefit of abstraction reductions • Support, but concerns about cost of schemes and impacts on customers bills
No (19.7%)	• There should be more local resilience first (local schemes), as well as reducing demand and fixing leaks • Canals and rivers are more sustainable than use of pipelines • Concerns customers bills will increase, and comments that customers who pay for the water should benefit from it • Concerns about environmental impact and disruption during construction • Should be a national water grid, not local ones
Don't know or other comment (3.3%)	• Need for new pipelines to avoid sensitive features and habitats, avoid significant landscape impacts and avoid planned new developments • Opposition to sewage discharges
Blank or	

	Key themes in responses to Question 17
no comment (12.3%)	

Summary response to the comments on Question 17

The table below contains our detailed responses to the comments made in Question 17.

Changes to our plan as a result of the feedback on Question 17

We acknowledge the broad support for bulk transfers and the increased resilience these bring to our strategy. We will continue to consider them as a key part of our strategy.

However, we have had to make a number of adjustments to our bulk transfer options for our revised draft strategy and these are discussed in Section 9. The reasons for these changes relate to ongoing discussions with donor companies (e.g. South East Water and SES water) and the need to develop additional resources that will enable the transfers.

The bulk transfer options that form part of our preferred strategy are presented in Section 9.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Comments and support for improvements to transfers. Some comments reference back to responses given to earlier question, including need to ensure area providing water has surplus to be shared, need to consider costs, carbon and energy use associated with pumping (particularly over long distances), potential environmental impacts of new pipelines (including landscape), need to engage with planning authorities, and consideration of wider national grid.	WRMP002 WRMP008 WRMP040 WRMP052 WRMP061 WRMP058 WRMP065 WRMP067 WRMP005 WRMP006 WRMP012 WRMP019 WRMP022 WRMP041 WRMP009 WRMP028 WRMP029 WRMP033 WRMP046 WRMP047 WRMP049 WRMP050 WRMP063 WRMP064 WRMP083 WRMP093 WRMP103 WRMP105 WRMP108 WRMP110 WRMP116 WRMP117 WRMP119 WRMP107 WRMP068 WRMP088	Transfers of water between companies, and between the areas that we supply, are an important part of our current water resources network and will play an increasingly important role in the future. Whilst there are environmental costs and impacts associated with such transfers, mitigation measures during their construction and operation are capable of being incorporated within the design and implementation of the schemes to make them more acceptable. Southern Water will work closely with other water companies and with local planning authorities over the planning and construction of schemes.
Comment that water transfers shouldn't include recycled water.	WRMP018 WRMP043 WRMP076 WRMP066	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife.
Comments and opposition to pipeline proposed as part of water recycling into Havant Thicket.	WRMP045	

Themes and issues raised in representations	Defra No.	Company consideration and response
		We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Comment on need to ensure agriculture has sufficient water in the winter	WRMP015	The needs of other abstractors are taken into account as part of our WRMP process and Southern Water and the other water companies in the south east have been working closely with other sectors, including agriculture as part of this process.
In principle, but we believe you should align your aims with the 'Chalk Streams First' grouping and the Catchment Based Approach (CaBA). Both these set out programs much more focussed than South-east water companied, and emphasise priority deliverables.	WRMP111	We have followed a catchment prioritisation approach based on one originally designed by the Environment Agency and agreed by WRSE Environmental Sub-Group. This approach seeks to bring forward abstraction reductions in catchments where the benefits can be quantified with the most confidence and will have the greatest effect. For example for us this includes the Chalk streams of the River Itchen, River Test and River Arun catchments. The overall prioritisation we have taken with WRSE is broadly aligned with the CABA strategy as set out in the CABA 2022 implementation plan However, there are several areas where the supporting evidence and benefits from some of the CABA principals is less certain, for example in assigning Abstraction Sensitivity Band 3 to all chalk streams or in redistributing abstraction from headwater streams to lower catchments. We are currently undertaking environmental investigations into the majority of our surface and groundwater abstractions, in collaboration with the Environment Agency, Natural England, and catchment stakeholders. These investigations will be completed by 2027 and will provide a robust evidence base to inform future abstraction licensing

Themes and issues raised in representations	Defra No.	Company consideration and response
		and may involve local refinement of flow targets and sensitivity banding. We will continue to include the Enhanced Abstraction Reduction Scenario within the possible range of scenarios evaluated by our adaptive plan. Our abstraction reductions through our Environmental Ambition will be phased in from 2030 and will continue through to 2050. These reductions are designed to meet flow or other environmental targets agreed with regulators and catchment stakeholders. In implementing licence reductions, we need to balance our ability to reduce abstraction while replacing lost supplies and maintaining the level of resilience we need to provide our customers against drought. We will continue to work with the Environment Agency, Natural England, and WRSE to explore how we can prioritize and bring forward licence reductions, especially in high priority catchments, as early as possible in line with updated Water Resource Planning Guidance.
Unsure, as consider more could be done to fix leaks.	WRMP060	The proposals in the draft WRMP seek to achieve targeted further improvements in leakage reduction, building on what has already been achieved, meeting the Government's targets.
But possibly not needed.	WRMP112	The detailed modelling undertaken as part of the preparation of our WRMP has shown that an increased ability to transfer water between areas is an essential part of our future water resources network.
Comments from respondents who disagreed.		
Comments that there should be investment in leakage reduction and reducing water consumption first. Comments also that there should be more rainfall capture and storage.	WRMP003 WRMP032 WRMP101 WRMP115	The proposals in the draft WRMP seek to achieve targeted further improvements in leakage reduction, building on what has already been achieved, meeting the Government's

Themes and issues raised in representations	Defra No.	Company consideration and response
Water should be kept in the area where those paying for it can use it. The priority for Southern Water should be providing water for the residents in their area, not those outside of it	WRMP081 WRMP086	targets. The scale of the challenge being faced means that both demand management and new resource developments are required, including additional storage solutions and new water transfers.
There should be a bolder national water grid. Unifying the 'water companies' would be one step to achieving this.	WRMP021 WRMP090	The support for a national water grid is noted. There are no current plans for a national water grid as such, however over time there are increasing connections between regions and companies to enable the sharing of available resources.
Concerns that water transfers are just a way of increasing income and profits for shareholders. Comments on trust.	WRMP027 WRMP078 WRMP082	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Opposition to transfers if they include recycled water. Concerns about the source of water if transferred in.	WRMP030 WRMP057 WRMP087 WRMP098 WRMP084	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been
Opposition to water recycling in Havant Thicket. If water recycling needed, should build the recycling plant near Otterbourne.	WRMP094 WRMP084	

Themes and issues raised in representations	Defra No.	Company consideration and response
		attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Opposition to sewage discharges	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our

Themes and issues raised in representations	Defra No.	Company consideration and response
		communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Answer depends on the environmental impacts of the new pipelines. Concerns at disruption.	WRMP071 WRMP079 WRMP082	Transfers of water between companies, and between the areas that we supply, are an important part of our current water resources network and will play an increasingly

Themes and issues raised in representations	Defra No.	Company consideration and response
		important role in the future. Whilst there are environmental costs and impacts associated with such transfers, mitigation measures during their construction and operation are capable of being incorporated within the design and implementation of the schemes to make them more acceptable. Southern Water will work closely with other water companies and with local planning authorities over the planning and construction of schemes.
Support for water transfers through canals and existing waterways.	WRMP085 WRMP003	The support for transfers using canals and existing waterways is noted. These options have been explored as part of the Options Appraisal for the WRMP and more widely as part of the regional plan process. Long distance canal and river transfers are included as options within the regional plan, and WRMPs, where they represent the most appropriate solution for a proposed transfer, when compared to pipeline transfers.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Unsure. Comments about more transfers and increased leakage.	WRMP004	The proposals in the draft WRMP seek to achieve targeted further improvements in leakage reduction, building on what has already been achieved, meeting the Government's targets. The scale of the challenge being faced means that both demand management and new resource developments are required, including additional storage solutions and new water transfers.
We would encourage as much concentration as possible on protecting and attenuating the water we have in the water cycle, reducing the contamination of clean usable water and reducing wastage of water, rather than a reliance on new infrastructure.	WRMP017	
Support unless the proposals include recycled water.	WRMP026	Water recycling schemes have been in operation internationally for decades, with the earliest examples dating back to the 1960s. In 2017, California alone had at least 8 large-scale indirect water recycling plants in operation, with a further seven in development. The longest standing example of water recycling systems is the Goreangab Water Reclamation Plant in Windhoek, Namibia. The first iteration of this system was commissioned in 1969; in 2002 this was replaced with a

Themes and issues raised in representations	Defra No.	Company consideration and response
		new larger facility. Unlike our proposal, this is a direct water recycling system, where the recycled water is transferred directly to the water supply works instead of discharging to the environment. No adverse health effects have been attributed to the introduction of this recycled water source to the drinking water supply for Windhoek. Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Opposition to sewage discharges.	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the

Themes and issues raised in representations	Defra No.	Company consideration and response
		least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external

Themes and issues raised in representations	Defra No.	Company consideration and response
		dividends since 2017
Support, however, any new pipelines should avoid sensitive habitats of ecological value and any significant impacts on the landscape	WRMP051 WRMP118	Whilst there are environmental costs and impacts associated with such transfers, mitigation measures during their construction and operation are capable of being incorporated within the design and implementation of the schemes to make them more acceptable. Southern Water will work closely with other water companies and with local planning authorities over the planning and construction of schemes.

1.7. Catchment and nature-based solutions

We are proactively engaging with farmers and landowners in our supply area to improve water quality in the rivers and protect the groundwater sources we rely on for public supply. This reduces or eliminates the need for developing infrastructure for water treatment and is also more sustainable in the long term. We sought views on this approach through Question 18.

Improvement in water quality of our rivers and groundwater does not only benefit Southern Water but other stakeholders and interest groups as well. As part of Question 19, we asked if other groups that benefit from these initiatives should contribute to the costs of implementing these solutions.

There are other groups and entities that are working to improve water quality in some of the catchments that form part of our supply area. Question 20 asked if there should be closer cooperation between these groups and Southern Water.

1.1.18. Question 18: Do you support our ambition to proactively use catchment and nature-based solutions where we can, to help improve the quality of the water sources we rely upon so we can abstract water sustainably and deliver wider environmental benefits?

Of the respondents to this question, approximately 84% agreed, whilst 4% disagreed (Figure 4.18; Table 4.18).

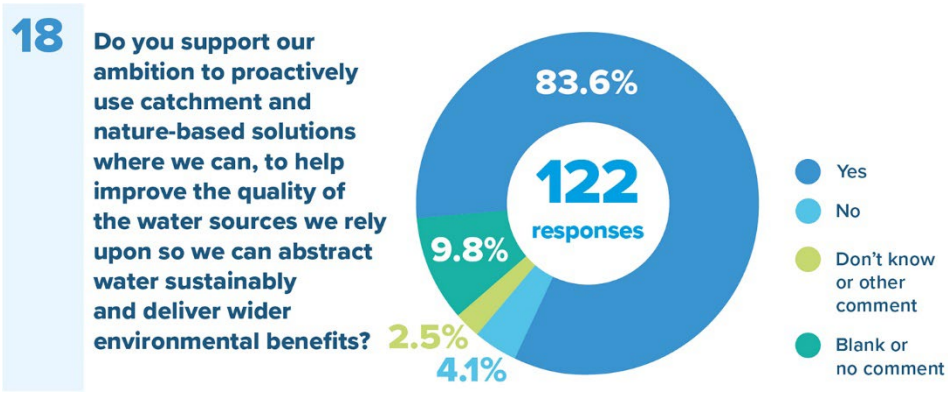

Figure 4.17 Feedback on Question 18.

Table 4.18 Summary of feedback on Question 18.

	Key themes in responses to Question 18
Yes (83.6%)	• Support for catchment schemes and nature based solutions • Support, but concern there are not any / enough of these schemes identified in the plan • Comments that more information is needed on what individual schemes would be, the benefits of them and how they will be delivered • Support, but water resources benefits of schemes are still not clear – needs to be clarified • Comments that these need to be implemented quicker, and/or at the same time as new resource options • Suggestion they should be combined with natural flood management schemes • Comments on trust and whether the schemes will be delivered
No (4.1%)	• This is something Southern Water should be doing, not having an ambition to do • Not being delivered fast enough
Don't know	• Support for work with agriculture sector on schemes

	Key themes in responses to Question 18
or other comment (2.5%)	• Comments on need for more data and understanding of options ad benefits • Opposition to sewage discharges
Blank or no comment (9.8%)	

Summary response to the comments on Question 18

The Table below contains our detailed responses to the comments made in Question 18. We will continue to engage with farmers and landowners to protect and improve water quality in the rivers and groundwater sources we rely on.

Changes to our plan as a result of the feedback on Question 18

Catchment management schemes remain an integral part of our plan. The benefits from these activities are now included in our baseline supply forecast.

We have provided an enhanced narrative in Annex 9 (Protecting and Enhancing the Environment) which highlights the work we are doing through our Catchment First programme including more details on the specific projects we are already undertaking. These include both land and catchment management schemes to protect raw water quality and environmental investigations and mitigations to understand and reduce the impacts of our abstraction on rivers, wetlands and groundwater.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Support for nature-based solutions and improvements to water quality. Comments that catchment schemes will address nitrates and pesticides and improve the resilience of water sources. Support for environmental improvements to rivers and catchments. Support for natural flood management as well. Need to consider the context of the economic, social and environmental benefits, and be evidenced led. Support for working with catchment partners, local authorities etc, and recognise the role of other abstractors, agriculture etc.	WRMP008 WRMP012 WRMP019 WRMP026 WRMP033 WRMP028 WRMP030 WRMP032 WRMP036 WRMP042 WRMP050 WRMP051 WRMP052 WRMP118 WRMP119 WRMP017 WRMP022 WRMP060 WRMP061 WRMP064 WRMP066 WRMP067 WRMP099 WRMP103 WRMP105 WRMP063 WRMP108 WRMP110 WRMP120 WRMP116 WRMP113 WRMP107 WRMP090 WRMP079 WRMP083 WRMP090 WRMP009 WRMP003 WRMP106 WRMP068 WRMP049	The support for catchment and nature based solutions is noted and welcomed. Whilst only limited schemes were included within the draft WRMP (as guidance indicates only schemes with a specific water resources benefit are able to be included), Southern Water is working widely with partners across its supply area to both investigate and implement solutions. More information and understanding is being gained through these projects which will help the design and implementation of other projects in the future, and monitoring the success of implemented schemes will help to better inform cases for funding for future schemes. Further schemes can be included for funding through the separate Business Plan process. Southern Water is grateful for the partners it currently works with and looks forward to continuing to develop working relationships with landowners and partners into the future.
Action on this should be happening already. Schemes should be implemented alongside new resource developments. Should be a strong regulatory framework with meaningful penalties	WRMP076 WRMP022 WRMP048 WRMP088	
Comment it is not clear what this actually means and/or it is not clear what Southern Water is actually planning to do. Support depends on what is actually planned and what it achieves.	WRMP027 WRMP018 WRMP005 WRMP095 WRMP107 WRMP087 WRMP098	As noted above, only limited schemes were included within the draft WRMP (as guidance indicates only schemes with a specific water resources benefit are able to be included), However Southern Water is working widely with partners across its supply area to both investigate and implement solutions. Further schemes can be included for funding through the separate Business Plan process. Further details on catchment schemes and our Catchment First Programme will be included in Annex 9 of the Revised Draft WRMP.
Strongly support Southern Water's stated commitment to a catchment first approach to water resource management. However, in Kent, beyond working with farmers to reduce nitrate contamination, there are no nature-based solutions planned in the short or long-term despite your stated ambition to proactively implement these. Details around implementation are sparse in the draft plan, as is the collaborative work with external partners that you say you are committed to.	WRMP047	
Comments on shareholder profits and issues of trust	WRMP027 WRMP114 WRMP078	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to

Themes and issues raised in representations	Defra No.	Company consideration and response
		improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Comment that this should not involve turning sewerage into drinking water	WRMP028	Water recycling proposals are separate from catchment and nature based solutions. There may be the potential to implement schemes alongside each other, where opportunities arise, delivering wider catchment benefits as part of new water resources options.
Support catchment solutions but note that the impact of abstraction on the environment is potentially harmful, especially in a climate stressed future. Particularly concerned about the health of the River Test and Itchen, internationally recognised rivers which have already been over abstracted historically. We also request that the plan investigates the impact of abstraction fully on the potential significant ecological impacts to surface water streams. In order to catch more water within catchment, a holistic view to pesticide (and other nutrient) reduction and management will also be required.	WRMP049	As part of delivering our WRMP Environmental Ambition We are currently undertaking further environmental investigations in both the Test and Itchen Catchments.in collaboration with the Environment Agency, Natural England, and catchment stakeholders. These investigations will be completed between 2025 and 2027 and will provide a robust evidence base to inform future abstraction licensing and may involve local refinement of flow targets and sensitivity banding. We will continue to include a range of abstraction reduction scenarios within the possible range of scenarios evaluated by our adaptive plan. Under our highest environmental scenarios we would cease abstraction entirely from the Itchen Catchment by 2050. Our abstraction reductions through our Environmental Ambition will be phased in from 2030 and will continue through to 2050. These reductions are designed to meet flow or other environmental targets agreed with regulators and catchment stakeholders.

Themes and issues raised in representations	Defra No.	Company consideration and response
		In implementing licence reductions, we need to balance our ability to reduce abstraction while replacing lost supplies and maintaining the level of resilience we need to provide our customers against drought. We will continue to work with the Environment Agency, Natural England, and WRSE to explore how we can prioritize and bring forward licence reductions, especially in high priority catchments such as the River Itchen and River Test, as early as possible in line with updated Water Resource Planning Guidance.
Support for rainfall capture and water efficiency and storage at local scale	WRMP094	The draft WRMP includes significant investment in water efficiency and demand management measures to include working with customers to reduce water use and develop local storage solutions, including farm storage and measures to reduce household and non-household water consumption.
In principle, but we believe you should align your aims with the 'Chalk Streams First' grouping and the Catchment Based Approach (CaBA). Both these set out programs much more focussed than South-east water companied, and emphasise priority deliverables.	WRMP111	We have followed a catchment prioritisation approach based on one originally designed by the Environment Agency and agreed by WRSE Environmental Sub-Group. This approach seeks to bring forward abstraction reductions in catchments where the benefits can be quantified with the most confidence and will have the greatest effect. For example for us this includes the Chalk streams of the River Itchen, River Test and River Arun catchments. The overall prioritisation we have taken with WRSE is broadly aligned with the CABA strategy as set out in the CABA 2022 implementation plan However, there are several areas where the supporting evidence and benefits from some of the CABA principals is less certain, for example in assigning Abstraction Sensitivity Band 3 to all chalk streams or in redistributing abstraction from headwater streams to lower catchments.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are currently undertaking environmental investigations into the majority of our surface and groundwater abstractions, in collaboration with the Environment Agency, Natural England, and catchment stakeholders. These investigations will be completed by 2027 and will provide a robust evidence base to inform future abstraction licensing and may involve local refinement of flow targets and sensitivity banding. We will continue to include the Enhanced Abstraction Reduction Scenario within the possible range of scenarios evaluated by our adaptive plan. Our abstraction reductions through our Environmental Ambition will be phased in from 2030 and will continue through to 2050. These reductions are designed to meet flow or other environmental targets agreed with regulators and catchment stakeholders. In implementing licence reductions, we need to balance our ability to reduce abstraction while replacing lost supplies and maintaining the level of resilience we need to provide our customers against drought. We will continue to work with the Environment Agency, Natural England, and WRSE to explore how we can prioritize and bring forward licence reductions, especially in high priority catchments, as early as possible in line with updated Water Resource Planning Guidance.
Support the use of nature-based solutions in principle but the extent to which NBS can affect the region's water supply and the wider impacts are unknown. The environmental and additional benefits may be more immediately obvious but unless they can deliver an appreciable extra supply they may have a limited role within water resources planning. Potential to align with Local Nature Recovery Strategies. and there may be	WRMP117	The support for catchment and nature based solutions is noted and welcomed. Whilst only limited schemes were included within the draft WRMP (as guidance indicates only schemes with a specific water resources benefit are able to be included), Southern Water is working widely with partners across its supply area to both investigate and implement solutions. More information and understanding is being gained through these projects which will help the

Themes and issues raised in representations	Defra No.	Company consideration and response
opportunities for land use changes away from water intensive uses and for schemes to contribute to Biodiversity Net Gain.		design and implementation of other projects in the future, and monitoring the success of implemented schemes will help to better inform cases for funding for future schemes. Further schemes can be included for funding through the separate Business Plan process. Southern Water is grateful for the partners it currently works with and looks forward to continuing to develop working relationships with landowners and partners into the future.
Comments from respondents who disagreed.		
Comment that it should not be an ambition - it is something that should be being worked on already.	WRMP057 WRMP097 WRMP072	Southern Water is working widely with partners across its supply area to both investigate and implement solutions. More information and understanding is being gained through these projects which will help the design and implementation of other projects in the future, and monitoring the success of implemented schemes will help to better inform cases for funding for future schemes.
Opposition to sewage discharges	WRMP062	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the

Themes and issues raised in representations	Defra No.	Company consideration and response
		least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external

Themes and issues raised in representations	Defra No.	Company consideration and response
		dividends since 2017
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Do not understand question	WRMP004	Southern Water will carefully consider the wording of questions for future consultations.
Opposition to sewage discharges	WRMP035	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows.

Themes and issues raised in representations	Defra No.	Company consideration and response
		Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Welcome advice, support and financial incentives to farmers in order to reduce or eliminate adverse land management practices. To target resources effectively will require a comprehensive understanding of where the water pollution originates. Does SW hold such data? If not, very detailed and extensive sampling is required. When we know where there are issues we can approach farmers to find a resolution.	WRMP122	Southern Water is working widely with partners across its supply area to both investigate and implement solutions. More information and understanding is being gained through these projects which will help the design and implementation of other projects in the future, and monitoring the success of implemented schemes will help to better inform cases for funding for future schemes.
Detailed comments on the level of abstraction at the Lukely Brook adversely affecting the farm's wet meadow and fen	WRMP122	Southern Water will contact the respondent directly to discuss the details of the comments in relation to Lukely

Themes and issues raised in representations	Defra No.	Company consideration and response
habitats but the 'solutions' being undertaken are not addressing the issue of simply too much water being taken from the watercourse.		Brook. We undertook environmental investigations between 2015 and 2020 and as a result agreed with the Environment Agency to apply tighter controls on abstraction licenses at two of our Groundwater Sources to provide greater protection to the stream and associated wetland Site of Importance for Nature Conservation. In addition to these revisions to our abstraction licenses we are also implementing a range of physical river enhancement measures to provide mitigation and environmental resilience including natural flood management measures and improved fish passage. Our future review of abstraction licenses under our Environmental Ambition also allows for further tightening of the abstractions which impact on the surrounding meadows.
Support for active measures to reduce demand and promote water efficiency	WRMP122	The draft WRMP includes significant investment in water efficiency and demand management measures to include working with customers to reduce household and non-household water consumption.

1.1.19. Question 19: Do you think that others who benefit from a healthy water environment should contribute to the cost of delivering these solutions?

Of the respondents to this question, approximately 47% agreed, whilst 30% disagreed (Figure 4.19; Table 4.19).

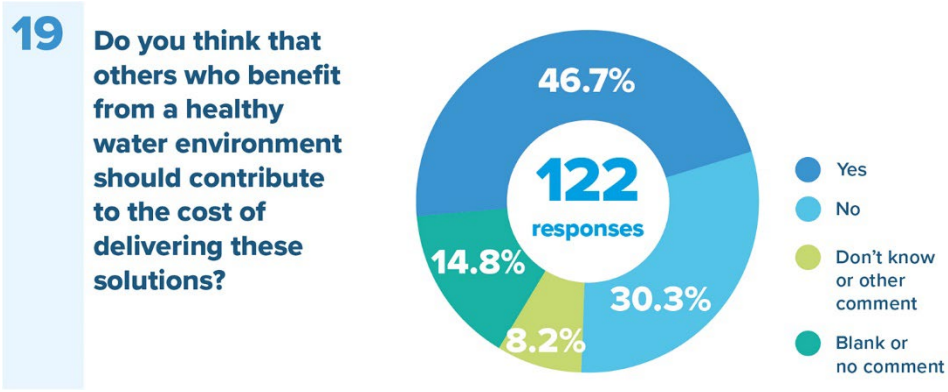

Figure 4.18 Feedback on Question 19.

Table 4.19 Summary of feedback on Question 19.

	Key themes in responses to Question 19
Yes (46.7%)	• Agree, costs should not only fall on customers but also others benefitting • Need for wide range of financing for these schemes and co-ordination of approach at national level • Comments on paying for water generally, including that large water users should pay more and have their own storage • Comments that developers should pay for new water resources to serve the houses they are building • Wide ranging comments on water company financing, profits, need for focus on customers bills and secure supplies • Comment on potential for planning system and s106 agreements and Community Infrastructure Levy to be used • Comment that the 'polluter pays' principal should apply • Support, but comment that question is unclear what this means
No (30.3%)	• Wide ranging comments on water company financing, profits, need for focus on customers bills and secure supplies • Comments on lack of investment and underperformance • Comments on environmental impact and damage from sewage discharges • Unclear what this means – who are the "others" • Opposition to water recycling into Havant Thicket
Don't know or other comment (14.8%)	• Unclear what is being proposed and so difficult to comment • A proportionate approach should be taken to sharing costs • Government intervention and action required • Opposition to sewage discharges
Blank or no comment (8.2%)	

Summary response to the comments on Question 19

The Table below contains our detailed responses to the comments made in Question 19.

From the comments, the majority of respondents did not understand the question being asked, and instead commented on water company finance and other issues generally. Those who did respond to the question supported exploration of this issue through catchment and other partnerships but have some reservations and comments.

Changes to our plan as a result of the feedback on Question 19

We have not made any changes to our strategy in response to this question, however we will be providing additional and improved narrative in Annex 9 of our draft WRMP describing our Catchment First programme and the associated projects.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Unclear what is meant by "others". Comments on other issues not related to the question, including agricultural use of water, sports stadiums and houses with large grounds. Question considered unclear / difficult to answer	WRMP012 WRMP032 WRMP066 WRMP076 WRMP099 WRMP004 WRMP008 WRMP116 WRMP072 WRMP040 WRMP099 WRMP110	The question relating to potential other sources of funding for measures to deliver catchment and nature based solutions. 'Others' in this sense relates to other organisations or individuals who would benefit from such schemes. Southern Water will carefully consider the question wording for future consultation.
Costs should not only be borne by customers, but comments that it may not be simple to securing funding from others. Qualified support.	WRMP045 WRMP067 WRMP048 WRMP061 WRMP064 WRMP081 WRMP071 WRMP078	It is recognised that it may not be simple to secure funding from other parties, particularly if they are not willing to contribute. However Southern Water's existing catchment and nature based solutions work involves working with a wide range of organisations and with a wide range of funding sources.
Important that those impacting the water quality of our water courses have an important part to play in addressing the problems.	WRMP064 WRMP108	Where pollution is caused by an individual or organisation then under the 'polluter pays' principle there is an expectation and obligation that the polluter is responsible for funding any works necessary as a result. Where pollution is derived from unknown or many different sources, this can represent complexities to this approach.
Comments that developer contributions, through S.106 agreements and the Community Infrastructure Levy, should be collected and provided to water companies to help mitigate the impact of development on water supplies.	WRMP011 WRMP119 WRMP005	Southern Water works closely with local planning authorities and developers to ensure that there is sufficient water resources to meet future planned needs. Where new housebuilding or other developments leads to a need for new water resources sooner than otherwise planned there can be provision to contribute towards additional costs to bring forward the provision.
There needs to be Government and other wider support for these plans, and a national system introduced. The costs should be borne by those benefitting, with funding from environmental organisations too.	WRMP033 WRMP095 WRMP087 WRMP098 WWRMP068 WRMP088 WRMP108 WRMP092 WRMP022	Southern Water and wider catchment partners work closely with Government and the economic and environmental regulators on the funding and approval for catchment and nature based solutions. Southern Water's existing catchment and nature based solutions work involves working with a wide range of organisations and with a wide range of funding sources. Whilst only limited schemes were
We think Southern Water should fund the delivery of schemes that achieve the water-related benefits required by their Business Plan, with other organisations providing	WRMP113	

Themes and issues raised in representations	Defra No.	Company consideration and response
further funds for the delivery of additional benefits. These organisations could be other businesses that benefit or those responsible for realising benefits for wider society (e.g. local authorities responsible for flood risk reduction.)		included within the draft WRMP (as guidance indicates only schemes with a specific water resources benefit are able to be included), Southern Water is working widely with partners across its supply area to both investigate and implement solutions. More information and understanding is being gained through these projects which will help the design and implementation of other projects in the future, and monitoring the success of implemented schemes will help to better inform cases for funding for future schemes. Further schemes can be included for funding through the separate Business Plan process.
Comments on shareholders profits and dividends	WRMP032 WRMP036 WRMP037 WRMP072 WRMP078 WRMP087 WRMP098 WRMP110	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Comments from respondents who disagreed.		
It is not clear to whom you are referring. Cannot answer the question. Lack of information to be able to answer. Isn't this Southern Water's role. Other comments	WRMP002 WRMP057 WRMP059 WRMP097 WRMP101 WRMP103 WRMP019 WRMP050 WRMP091 WRMP090 WRMP021	The question relating to potential other sources of funding for measures to deliver catchment and nature based solutions. 'Others' in this sense relates to other organisations or individuals who would benefit from such schemes. Southern Water will carefully consider the question wording for future consultation.
Those impacting on the environment should pay. Customers should not have to pay costs incurred by others.	WRMP003 WRMP026 WRMP106	Where pollution is caused by an individual or organisation then under the 'polluter pays' principle there is an expectation and obligation that the polluter is responsible for funding any works necessary as a result. Where

Themes and issues raised in representations	Defra No.	Company consideration and response
		pollution is derived from unknown or many different sources, this can represent complexities to this approach.
Comments on poor customer service	WRMP015	There have been a number of recent interruptions to supply in Hampshire, for which Southern Water has apologised and compensated customers. The proposals in the Draft WRMP will make supplies more resilient in the future.
Opposition to sewage discharges	WRMP016 WRMP062 WRMP091 WRMP106 WRMP090	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with

Themes and issues raised in representations	Defra No.	Company consideration and response
		five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments on underinvestment and shareholder profits	WRMP018 WRMP020 WRMP024 WRMP027 WRMP028 WRMP082 WRMP094 WRMP009 WRMP047 WRMP084	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and

Themes and issues raised in representations	Defra No.	Company consideration and response
		reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Unsure or not able to answer. Comments on question being unclear or lack of information.	WRMP030 WRMP117 WRMP122	The question relating to potential other sources of funding for measures to deliver catchment and nature based solutions. 'Others' in this sense relates to other organisations or individuals who would benefit from such schemes. Southern Water will carefully consider the question wording for future consultation.
Opposition to sewage discharges	WRMP035 WRMP122	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving

Themes and issues raised in representations	Defra No.	Company consideration and response
		the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Comments on shareholder dividends and profits and the need for investment.	WRMP046 WRMP049	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017.

Themes and issues raised in representations	Defra No.	Company consideration and response
		Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
For trade, commercial and industry however, we consider that there may be more possible benefits to explore. Working with other organisations may also drive different funding models which would be helpful.	WRMP049	Southern Water's existing catchment and nature based solutions work involves working with a wide range of organisations and with a wide range of funding sources. Whilst only limited schemes were included within the draft WRMP (as guidance indicates only schemes with a specific water resources benefit are able to be included), Southern Water is working widely with partners across its supply area to both investigate and implement solutions. More information and understanding is being gained through these projects which will help the design and implementation of other projects in the future, and monitoring the success of implemented schemes will help to better inform cases for funding for future schemes. The question relating to potential other sources of funding for measures to deliver catchment and nature based solutions. 'Others' in this sense relates to other organisations or individuals who would benefit from such schemes.
It is recognised that a number of industry sectors and organisations can contribute to a deteriorating water environment and that the costs of rectifying this can sometimes be disproportionately shared. It is not specified in what circumstances and by what mechanism this contribution would be levied. It is not clear who these "others" would be. It is likely that additional levels of national or government investment may be required. A proportionate approach should be employed when calculating and attributing costs towards measures that will improve the water environment to ensure everyone proportionally pays for the impacts they create.	WRMP117 WRMP118	
Catchment and nature-based solutions can deliver multiple outcomes for people and nature and therefore there are potential opportunity to investigate additional or complementary funding sources for projects to realise some of the added value outcomes.	WRMP120	
Comments that polluters should pay - whether Southern Water, or others discharging to the environment. Comments also about diffuse pollution from agriculture, and the lack of financial penalties and disregard affecting both water courses and the flooding of residential properties.	WRMP122	Where pollution is caused by an individual or organisation then under the 'polluter pays' principle there is an expectation and obligation that the polluter is responsible for funding any works necessary as a result. Where pollution is derived from unknown or many different sources, this can represent complexities to this approach.


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1.1.20. Question 20: Do you or your organisation have similar work planned in our catchments? Do you have any views on how best we can co-ordinate this work so we achieve the most benefits?

Of the respondents to the question, approximately 12% said yes, whilst 61% said no (Figure 4.20; Table 4.20).

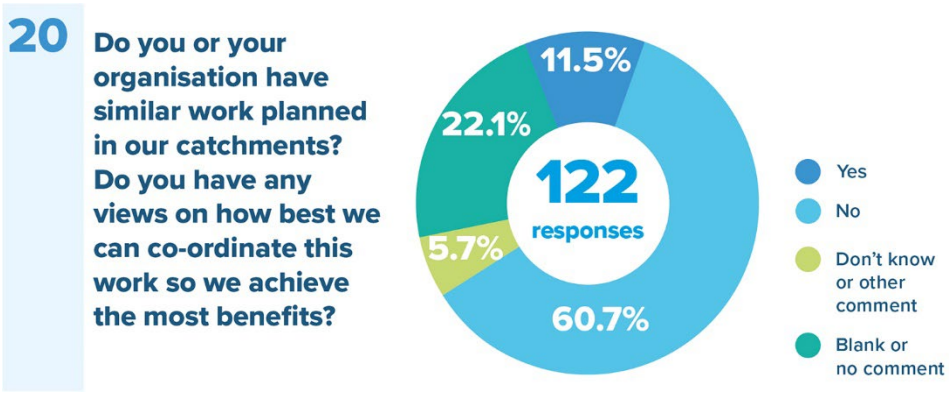

Figure 4.19 Feedback on Question 20.

Table 4.20 Summary of feedback on Question 20.

	Key themes in responses to Question 20
Yes (11.5%)	• Comments highlighting work of catchment partnerships, wildlife trusts, Rivers Trusts, RSPB and other parties in working within this sector and bringing forward schemes • Comments on specific opportunities currently being worked on, and suggestions for ways in which Southern Water can engage further, including providing organisations for Southern Water to contact • Requests for more clarity on Southern Water's role and resources for supporting these types of projects • Concerns that trust is a barrier to joint working, and customer support • Comments and opposition to water recycling into Havant Thicket • Opposition to sewage discharges
No (60.7%)	
Don't know or other comment (5.7%)	
Blank or no comment (22.1%)	

Summary response to the comments on Question 20

Table contains our detailed responses to the comments made in Question 20.

Southern Water welcomes the feedback to this question and will look to work with its existing and new catchment partners and to explore new catchment relationships to develop and bring forward schemes.

Changes to our plan as a result of the feedback on Question 20

We have made no changes to our plan as a result of direct feedback on this question because we are either already working with responders through our Catchment First programme or no specific additional schemes were presented. Where responses have expressed an interest in working more closely with us we have passed this feedback to our Catchment First team.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who provided comments.		
Support for working in partnership with others to deliver these schemes. Already working with Southern Water's catchment team.	WRMP006 WRMP061	The support is noted and welcomed.
Hampshire County Council is keen to work with as many partner Risk Management Authorities (RMAs) as possible to improve the management of water across the region and recognise the risks and multiple benefits that good water stewardship can present.	WRMP017	The comments are noted and will be fed back to the catchment team at Southern Water
Kent's catchment partnerships, the Kent Nature partnership, Southeast Rivers Trust, and Kent Wildlife Trust all work on nature-based solutions that benefit water resources/quality across Kent's hydrological catchments. It is important that Southern Water works with these organisations and groups to maximise the potential and wider benefits of catchment-based schemes.	WRMP047	The comments are noted and will be fed back to the catchment team at Southern Water
We have a nutrient offsetting scheme within the Council and are potentially considering wetland creation schemes which would remove nitrates and phosphates in the Itchen catchment.	WRMP049	The comments are noted and will be fed back to the catchment team at Southern Water
PfSH Water Quality Working Group strongly encourage Southern Water to continue working with the Strategic Environmental Planning team to continue to improve water quality and resources in the Solent catchment. The team have experience in nature-based solutions including created constructed wetlands and through the removal of nutrients through the use of SuDS and would welcome continued partnership working with Southern Water. Southern Water should also continue to support the work of the Catchment Partnership1 to deliver a range of positive projects for the water environment.	WRMP051 WRMP065 WRMP118	The comments are noted and will be fed back to the catchment team at Southern Water
Swale Borough Council would welcome closer dialogue with Southern Water on local issues – to deal with existing problems and plan for the future.	WRMP052	The comments are noted and will be fed back to the catchment team at Southern Water
Ashford Borough Council has been working proactively to address the nutrient neutrality problem within the Stour catchment. As part of this work, the Council has been preparing a borough mitigation strategy	WRMP063	The comments are noted and will be fed back to the catchment team at Southern Water

Themes and issues raised in representations	Defra No.	Company consideration and response
which will help to release the current hold on residential development within a large part of the borough. The mitigation strategy will include the creation of strategic wetlands to offset the nutrients generated from future developments. As part of this strategic wetland, the Council have been engaging with Southern Water and will continue to do so, to ensure that a nature based solution can be delivered in order to release sustainable housing development in the borough.		
Development management, highways works and spatial planning policy are key areas where closer working with Southern Water and other water companies can drive improved planning and delivery to reduce use, protect the natural environment and limit pollution.	WRMP068	The comments are noted and will be fed back to the catchment team at Southern Water
Lewes DC work in partnership with Ouse &Adur Rivers Trust and Sussex Flow Initiative, and others to implement Natural Flood Management interventions across both the Ouse and eastern Adur catchments. The work seeks to hold water in the catchment, at a landscape scale, It has multiple benefits we would be keen to explore this with you further.	WRMP105	The comments are noted and will be fed back to the catchment team at Southern Water
TMBC are continually updating our infrastructure delivery plan. As such we would welcome close engagement with Southern Water to ensure that water services infrastructure is identified and delivered in a timely manner.	WRMP108	The comments are noted and will be fed back to the catchment team at Southern Water
The South East Rivers Trust's PROWATER project (in which Southern Water was a partner), Southern Water's Resilience Pilots, and the Darent Landscape Recovery project are demonstrating the benefit of rural land management and wetland restoration in addressing water resources, water quality and flooding issues together. Our experience to date suggests that, in predominantly rural areas, these schemes work best if they are led by a local, trusted intermediary (such as a rivers trust which is a charity set up in the public interest) which is embedded with landowners/farmers and also understands the needs and drivers of potential beneficiaries – including water companies, local authorities concerned with flood risk and biodiversity gain, and businesses that source from productive land. Such an intermediary can then identify C&NbS and a payment model for their delivery that is attractive to	WRMP113	The comments are noted and will be fed back to the catchment team at Southern Water

Themes and issues raised in representations	Defra No.	Company consideration and response
landowners, but also meets the requirements of those seeking to fund and derive benefits from them.		
We encourage Southern Water to work in partnership with Catchment Partnerships to deliver C&NbS. This will help Southern Water align solutions with objectives in River Basin Management Plans, Flood Risk Management Plans and Local Nature Recovery Plans. Importantly, it will ensure schemes address pressures holistically, take account of local issues and deliver maximum benefits for people and wildlife. Catchment Partnerships need a small amount of funding to function effectively, but partners are able to deliver schemes with local groups that are cost effective and draw on a range of funding sources. The South East Rivers Trust would like to work closely with WRSE and its member water companies to further develop the evidence base and assessment framework around C&NBS so that they can be mainstreamed into water resources planning and water company business plans.	WRMP113	The comments are noted and will be fed back to the catchment team at Southern Water
The responding NW Sussex authorities do not operate beyond their administrative areas. However it is understood that water neutrality is likely to become more common place, and as the first area to have this requirement placed upon us are happy to share best practice and our experience with others who may need to pursue such an approach.	WRMP117	The comments are noted and will be fed back to the catchment team at Southern Water
The RSPB manages nature reserves and designated sites within your catchment and is already engaging with Southern Water to look at issues and opportunities to protect, restore, build resilience and enhance these sites. We are also involved with a number of partnership projects which have the potential to deliver multiple benefits for the water environment for both people and nature. We would continue to encourage Southern Water to engage with environmental organisations and other key stakeholders to facilitate collaborative solutions which deliver on multiple outcomes. We encourage collaboration through the Catchment Partnerships. We also have seen the value demonstrated by the Harbours Summit and subsequent Technical Working Group of bringing together key stakeholders to focus on a specific area, which presents particular issues and opportunities, and providing dedicating resource to tackle these collaboratively. Where	WRMP120	The comments are noted and will be fed back to the catchment team at Southern Water

Themes and issues raised in representations	Defra No.	Company consideration and response
international designations are being impacted by Southern Water operations, we consider that this model of coordinating work should be explored (e.g. Arun Valley).		
The Island's ANOB CSF adviser is continuing to work across the Island providing advice, guidance and support to farmers. The use of Countryside Stewardship agreements is helping to improve farm environments addressing diffuse pollution and wider issues such as wildlife conservation. Working with Southern Water is proving beneficial - we have similar objectives. This is a welcome and effective partnership. However, over abstraction, SWO and the operation of STWs can, in some instances and at certain times, be working against us. For example, where the EA do not set limits on phosphate from STWs this can be a damaging pollutant in sensitive locations. Cridmore Bog SSSI receives the outfall from the works just upstream and anecdotal reports of highly polluted water flushing into the SSSI are concerning.	WRMP122	The comments are noted and will be fed back to the catchment team at Southern Water
Opposition to water recycling in Havant Thicket.	WRMP018	Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of alternative options.
Opposition to sewage discharges, issues of trust affecting partnership work.	WRMP035 WRMP062 WRMP122	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response.

Themes and issues raised in representations	Defra No.	Company consideration and response
		We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017
Recognition of the need for people with the right skills and knowledge to work on these schemes. Need for progress with the schemes. Other comments. Need to communicate with members of the public.	WRMP036 WRMP058 WRMP087 WRMP098 WRMP114	The comments are noted.

1.8. Our proposed strategy for maintaining future supplies

Our Draft Plan proposed a number of options to make sure that we continue to maintain uninterrupted supply of water to our customers in all but the most extreme drought conditions. These included options to reduce demand and as well as to increase supply. Question 21 asked if we had the right balance of demand-side and supply-side options in our basket of options for securing future supplies.

1.1.21. Question 21: Our draft WRMP includes options that will reduce demand and a mix of different schemes to produce extra water supplies. Do you think our plan strikes the right balance between demand and supply solutions?

Of the respondents to this question, approximately 25% thought we had the right balance, whilst 46% disagreed (Figure 4.21; Table 4.21).

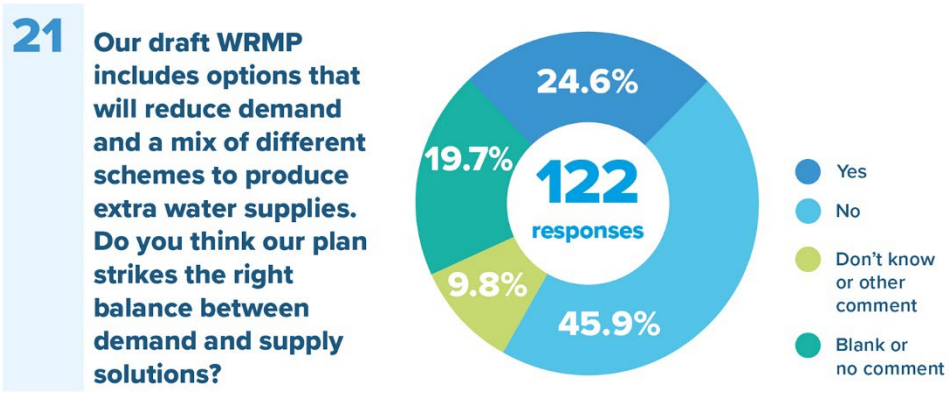

Figure 4.20 Feedback on Question 21.

Table 4.21 Summary of feedback on Question 21.

	Key themes in responses to Question 21
Yes (24.6%)	• Support for a wide range of options and comments on how options should be prioritised • Support, but comments that desalination should be a last resort or not pursued at all • Comments that should maximise leakage reduction and water efficiency first, before new supplies • Comments supporting balanced approach between demand management and new resources • Some concerns whether demand management is over ambitious, and risks to delivery • Support but concerns about the cost and impact on customer bills, and need for protection for those struggling with bills
No (45.9%)	• Opposition to water recycling, and proposal for water recycling to Havant Thicket • Too much emphasis on supply options and not enough on leakage and water efficiency – should be more ambitious • Lack of detail on demand management measures – need to understand their effectiveness • Comments that timescales are all too long – need faster action • Concerns about delivery – and perception previous plans have not delivered • Comments that the proposals remain unclear – what will be built, where and when • Concern about environmental impacts and cost of desalination • Opposition to sewage discharges
Don't know or other	• Comments that more focus on demand management and leakage reduction is needed • Role of local authorities in water efficiency in new housing, and delivering resource schemes

	Key themes in responses to Question 21
comment/ no response (29.85%)	• Comments that some options should be prioritised and brought forward earlier • Opposition to sewage discharges
Blank or no comment (19.7%)	

Summary response to the comments on Question 21

The Table below contains our detailed responses to the comments made in Question 21. As discussed in Section 8, we have made a number of changes to the options that were included in the Draft Plan. These include both supply-side options as well as demand-side options.

Changes to our plan as a result of the feedback on Question 21

We are aiming to meet the PCC, non-household consumption and leakage reduction targets set by the Government as a minimum. We have considered scenarios involving greater reductions in PCC and leakage than that required by guidance. We finalised our demand reduction targets after careful consideration of the deliverability risk and intend to achieve dry year PCC of 110 l/h/d five years ahead of the Government 2050 expectation. Overall our revised draft plan balances these options to reduce leakage and demand with other options to increase supplies or network connectivity.

Themes and issues raised in representations	Defra No.	Company consideration and response
Comments from respondents who agreed.		
Broad support for the proposals in the plan and the balance between demand management and new supplies. Support for focus on demand management measures.	WRMP037 WRMP108 WRMP114 WRMP117 WRMP063 WRMP064	The support is noted and welcomed.
Support, but comment that need to be more ambitious in looking for and studying all possible solutions.	WRMP012 WRMP099	A detailed Options Appraisal was undertaken as part of the preparation of the WRMP, in which Southern Water identified and assessment a significant range of different options, both within its supply area and also those options outside of the area but with the potential to supply water to Southern Water.
Support but not for desalination due to concerns about environmental impacts	WRMP008 WRMP019	The potential environmental impacts associated with desalination plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced.
Support but need to reduce leakage and waste, and take action sooner.	WRMP036 WRMP058	The draft WRMP incudes significant investment in reducing leaks and water use through demand management measures, however the scale of the water resources challenge being faced means that new water resource options are also required. The timescales for securing the leakage reduction and demand management savings take account of the costs and delivery issues associated with them, and are considered to be an appropriate timescale.
Concern may be overly ambitious on demand side options and may not be able to deliver to the targets being set. This would lead to more supply options being needed in future.	WRMP022	
Partial support, including depending on cost and delivery, and subject to details.	WRMP040 WRMP046 WRMP092 WRMP066	The investment modelling undertaken by WRSE for the regional plan and company WRMPs is undertaken on a least cost and best value basis. The modelling of different adaptive plans and sensitivity tests includes testing different costs for options and timescales for delivery to ensure that the range of options selected is robust.

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Support provided that Southern Water strives to achieve per capita consumption of 100 litres or less per person per day by 2040. If the company decides to aim for the national government target of 110 litres per person per day by 2050, then our answer is no – more ambitious demand management is required to achieve the right balance.	WRMP047	We are aiming to meet the PCC, non-household consumption and leakage reduction targets set by the Government as a minimum. We have considered scenarios involving greater reductions in PCC and leakage than that required by guidance. We will finalise our demand reduction targets after careful consideration of the deliverability risk.
Comment on the need to press the regulators around the extent of groundwater abstraction impacts on river ecology. An overly precautious approach based on little evidence might be driving an exaggerated need for bigger water resources schemes (worse for the environment and more costly for customer). The balance might be best tipped back to utilising groundwater resources sensibly a bit. Improving river habitats would provide a quicker and more everyday continuous improvements to river ecology.	WRMP019	On abstraction reductions, there is a period of further investigation and assessment planned over the period to 2030 to assess and quantify the wider environmental benefits associated with planned and potential licence changes. This will help inform decisions to be made in subsequent WRMPs.
The plan will need to be kept under review and appropriately adapted if circumstances or delivery changes - having an adaptive plan is therefore important. We are mindful that the scale of the challenge is huge, costs are considerable and the phasing of activity therefore key to helping keep customers' bills affordable.	WRMP064	Following approval of the WRMP there is a process
It is CCW's view that a single affordability scheme to protect those already struggling with their water bills is essential and would allow the necessary investment in these essential services to make them more resilient.	WRMP064	We currently have measures in place to protect vulnerable customers and we will continue to assist customers that need our support.
Comments from respondents who disagreed.		
Comments about costs and impacts on customers.	WRMP004 WRMP067 WRMP098 WRMP088 WRMP087	The cost to customers of the significant planned investment is an important factor. The draft WRMP seeks an appropriate balance between cost, securing resources for customers and the protection of the environment.

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Comments on the effectiveness of the demand side solutions, and whether this is overstated.	WRMP009 WRMP082	Southern Water has carefully considered the proposed demand side solutions included within the WRMP, including timescales for securing the leakage reduction and demand management savings. The options included within the plan take account of the costs and delivery issues associated with them, and are considered to be deliverable solutions and achievable targets.
Should increase the demand management focus.	WRMP048 WRMP074 WRMP096 WRMP101 WRMP068	
Comments on shareholder dividends and profits	WRMP013	Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017. Funds managed by MAM injected £1.1 billion to recapitalise the Southern Water group in September 2021. This financed additional investment in infrastructure, and reduced group debt. As operational performance improves, distributions will be kept below a 4% yield in each year to March 2025.
Opposition as need to fix leaks	WRMP018 WRMP013 WRMP50 WRMP101 WRMP119 WRMP105	The draft WRMP sets out Southern Water's ambitious plans to invest significantly in leakage reduction, building on the reductions achieved to date. To meet the scale of challenges in the future there is a need new resources development as well as the demand management measures.
There is too much emphasis on new reservoir capacity and insufficient on leakage reduction and encouraging users to reduce their demand.	WRMP023 WRMP032	
Opposition to water recycling in Havant Thicket as part of the plan.	WRMP026 WRMP028 WRMP018 WRMP027 WRMP068 WRMP076 WRMP084 WRMP112 WRMP098 WRMP087	Water recycling is necessary as an alternative source of water that can deliver sufficiently large volumes to allow us to reduce the abstraction pressure on Chalk Streams across South East England. These streams are home to a unique and diverse range of wildlife. We have provided a dedicated Annex 6 to our Statement of Response to address the wide range of representations and concerns regarding the Havant Thicket Transfer and Water Recycling Project including the evaluation of

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		alternative options.
All need to make faster progress to lesson the extent of Global warming and climate change.	WRMP033	Southern Water has considered the potential climate change impacts as part of the preparation of the WRMP, including on the availability of supplies and impacts on demand for water. In addition, all the water companies are targeting zero net operational emissions by 2030, twenty years before the economy as a whole.
Needs to be more ambitious. Concerned about under delivery in the past. Need to progress without delays.	WRMP041 WRMP110 WRMP033 WRMP050 WRMP119	The draft WRMP includes ambitious demand management, leakage reduction and new resource developments. This is a significant level of planned investment in securing supplies for customer in response to the challenges being faced. Funding will come from customers through their water bills. There is a need for a clear focus on delivery over the short term as detailed investigations of options and applications for planning and other consents are prepared and submitted.
The WRMP focuses more on developing new supply side schemes (rather than invest and repair in infrastructure). Further details requested on funding mechanisms would be welcomed.	WRMP049	
Unsure, or not able to comment	WRMP057	Comment is noted.
Opposition to sewage discharges	WRMP062 WRMP013	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering

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		the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to

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		make to improve company performance. We have not paid external dividends since 2017
Concerns at focus on desalination because of environmental harm.	WRMP068	The potential environmental impacts associated with desalination plants are a factor that weighs against the selection of those options as part of the plan, however over the longer term there is a need to rely on options such as this to meet the scale of the water resources challenge being faced.
Not enough emphasis on storage of winter rainfall.	WRMP074 WRMP018	Southern Water is investing significantly in new resource developments, including additional storage and new resource options to make supplies more resilient. The proposals in the plan balance this need for more resources with temporary restrictions during a drought.
Lack of confidence in Southern Water and its plans.	WRMP090 WRMP087	We are sorry that Southern Water has not always met expectations in recent years. We are now in a position to deliver significant change for our customers and the environment, notably: We are investing £2 billion (c.£1,000 per household) over the current regulatory period, 2020-25, more than our regulatory allowance, to significantly improve our performance; In September 2021, funds managed by Macquarie Asset Management (MAM) invested £1.1 billion to recapitalise the Southern Water group. We have pilot projects underway to help inform the optimal approach to reducing storm overflows of a 'dual purpose' network. As rightly demanded by our customers, Defra and other stakeholders, we would like to go further and faster; this will require agreement on how this is funded. We are currently on-track to reduce pollution by 40% compared to 2021 with much still to be done to maintain

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		this to the end of the year; we are industry leading in self-reporting, and we are investing £230m above our Ofwat regulatory allowances. Havant Thicket will be the first new reservoir to be built in the South East since the 1970s. Leakage – our leakage is currently 17%. Whilst this is better than the industry average of 23%, we are committed to reducing this by half by 2050. Cost of living – we are supporting our vulnerable customers by increasing the discount on our social tariff to 45% (reducing the average combined bill from £402 to £221). This will benefit over 103,000 customers. Dividend and pay – we have not paid a dividend to external shareholders since 2016/17 and our executive pay is amongst the lowest in the sector.
It is not yet clear what new water sources will be developed. It is not clear how (much) you incorporate natural flood management. It is not at all clear whether and how much reduction of abstraction will be realised in our zone (SBZ), you even seem to doubt the feasibility of this option.	WRMP105	We are working with WRSE and neighbouring companies including South East Water to develop our revised strategy for the Sussex Brighton WRZ. It should be noted that three schemes mentioned are features of South East Water's Water Resource Management Plan and not ours. All of our Sussex Brighton Groundwater Sources are being considered under our WINEP environmental investigations, in collaboration with the Environment Agency, Natural England, and catchment stakeholders. These investigations will provide a robust evidence base to inform future abstraction licensing. As we do not yet know the final outcome of these investigations our Environmental Ambition includes a plausible range of abstraction reductions as part of our adaptive planning approach. These reductions be phased in from 2030 and will continue through to 2050. These reductions are designed to meet flow or other

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		environmental targets agreed with regulators and catchment stakeholders. In implementing licence reductions, we will need to balance our ability to reduce abstraction while replacing lost supplies and maintaining the level of resilience we need to provide our customers against drought and will explore these through sensitivity testing of our strategy. .
Although it is to be welcomed that the draft plan does envisage a role for demand management (including leakage reduction), the extent to which this will contribute to supply contrasts with the contribution from inter-company transfers including a large transfer from Thames Water which is itself 'dependent on a major new source of water being developed' - namely the SESRO reservoir in Oxfordshire.	WRMP116	The draft WRMP includes significant demand management measures that are proposed to be implemented, to build on the leakage reduction and household water use reductions that have already been achieved. In addition, the Drought plan sets out additional measures that would be taken in a drought, including enhanced leakage reduction, publicity and water efficiency promotion. The proposals are considered to represent the most appropriate balance between new resources development and demand management measures.
Concern that comments won't be listened to	WRMP072	Southern Water is grateful to all those who have taken the time to respond to the consultation on the draft WRMP. The preparation of this Statement of Response is an important part of the plan preparation process, and the means by which Southern Water sets out how it has considered and responded to the comments raised. It will not be possible to respond positively to all of the comments received, but the responses do inform the content of the WRMP and Southern Water and Defra's decision making.
Comments from respondents who provided a comment rather than agreeing or disagreeing		
Higher demand management targets should be followed, a better balance with leak reduction, recycling and rainwater harvesting and storage. Comments include need for	WRMP003 WRMP042 WRMP111	The draft WRMP includes significant demand management measures that are proposed to be implemented, to build on the leakage reduction and household water use reductions that have already been

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supportive planning policies for water use in new developments.		achieved. The proposals are considered to represent the most appropriate balance between new resources development and demand management measures. Supportive planning policies for water efficiency measures in new developments are an important part of achieving these objectives.
Comment on the need for education campaigns and highlighting the need for customers to reduce water usage. If water is managed properly and not wasted, this would significantly reduce the need to secure new water supplies. A significant focus on protecting the water we have is needed before water transfer and de-salination should be considered. Rainwater capture, attenuation of water, reduction of leaks, prevention of water contamination and better education all have a role. it will be crucial that the plan provides confidence around certainty and deliverability of the demand management measure proposed.	WRMP017 WRMP051	The draft WRMP includes significant demand management measures that are proposed to be implemented, to build on the leakage reduction and household water use reductions that have already been achieved. The support of customers is essential to the achievement of planned targets. Whilst Southern Water can provide education, media campaigns, water audits and water efficiency measures, it is the customers who control how much water is used. Southern Water is committed to working closely with customer groups and individual customers to achieve this. The proposals are considered to represent the most appropriate balance between new resources development and demand management measures.
Customers of Southern Water within Swale have suffered from supply outages, in particular in July 2022 on the Isle of Sheppey - confidence in Southern Water has been severely challenged. Sewage discharges also affected this. Significant investment in nature-based solutions, as well as engineered infrastructure such as sewers and treatment works, will be needed urgently to turn this around and rebuild public confidence in Southern Water. Welcome closer dialogue with Southern Water on local water supply and waste water issues.	WRMP052	There have been a number of recent interruptions to supply across parts of its water supply area, for which Southern Water has apologised and compensated customers. Southern Water is committed to working hard with customers and partners to bring forward necessary infrastructure improvements, and to invest in delivering improvements. The proposals in the Draft WRMP will make supplies more resilient in the future.
Reducing leakage must be the first priority, but not best placed to have a view on the balance between that and other measures to secure the water needed	WRMP065	The draft WRMP incudes significant investment in reducing leaks and water use through demand management measures, however the scale of the water resources challenge being faced means that new water

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		resource options are also required.
Not all options have been considered.	WRMP079	A detailed Options Appraisal was undertaken as part of the preparation of the WRMP, in which Southern Water identified and assessment a significant range of different options, both within its supply area and also those options outside of the area but with the potential to supply water to Southern Water.
The balance at this stage appears to be appropriate, noting that the WRMP will be flexible by following adaptive pathways on a 'no regret' basis. Given the WRMP is refreshed each 5 years, any issues arising can be revisited at that stage. The key issue is to ensure the plan delivers sufficient resources to meet planned growth in Local Plans.	WRMP103	Southern Water liaises closely with local planning authorities to ensure that the proposals in the WRMP take account of planned levels of future housebuilding in Local Plans. In addition, higher and lower levels of growth are also capable of being accommodated within the adaptive WRMP.
Support for the proposals as long as they have factored most accurate growth figures for the Borough and any proposals would not lead to a degradation of water supplies to existing users in the Borough.	WRMP119	
We are supportive of the emphasis in the plan to deliver significant demand reductions, and pleased to see significant investment early on to achieve these. We challenge Southern Water to increase investment in water efficient buildings as an alternative to Desalination, and ramp up its ambition on non household water demand. Given the uncertainty and therefore risk associated with demand management measures, we urge Southern Water to advance demand measures in parallel with "no regrets" supply schemes that can deliver environmental gains with certainty and a relatively small investment, and within a short timeframe. In addition, Southern Water's business plan should include contingency for failing to achieve 100 l by 2040.	WRMP113	The draft WRMP includes significant demand management measures that are proposed to be implemented, to build on the leakage reduction and household water use reductions that have already been achieved. The proposals are considered to represent the most appropriate balance between new resources development and demand management measures. Given the scale of the water resources challenge being faced, and the relative lack of options over the longer term, there is a need for options including water recycling and desalination as part of the WRMP. There is a significant focus on demand management measures within the early part of the WRMP period. The WRMP includes sensitivity testing and scenario planning which tests the deliverability of options, including cost and delivery dates, to ensure that the WRMP is capable of
Recognition of the difficulty in finding the right balance between reducing demand and selecting the best options	WRMP118	

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to achieve sufficient supply taking into account impacts on customer bills and on the environment. The Council would like some of the measures brought further forward in time - leakage reduction targets, per person per day water consumption targets and proposed stopping the use of drought orders and permits.		adapting to changing circumstances over the planning period.
Comment that demand Management and reduced leaks results in fewer new schemes required, avoiding some environmental impacts. Concerns about meet existing water demands resulting in overextraction, environmental damage and negative impacts on designated sites, with risk of climate change worsening this. The plan should inform and be informed by local development plans and advocate for tighter building standards and water neutrality development.	WRMP120	
Opposition to sewage discharges	WRMP035 WRMP052	Since privatisation, we have improved and increased the volume of wastewater that is fully treated before release back into the environment, from 30% to 95%, through investment of £10bn. This has improved the quality of our bathing waters from only 28% meeting public health standards, to 80 out of 83 now rated as 'good' or 'excellent', with the other 3 being 'satisfactory'. We welcome Defra's recent Storm Overflows Discharge Reduction Plan, especially the recognition that it requires a multi-agency approach to separate its dual purposes of moving wastewater and capturing storm run-off. Southern Water's spill rate is amongst the lowest in the sector, and we have plans to reduce it further, to 18 per storm overflow by 2025. We believe we can do this through a combination of increased storage and reducing the rain run-off entering the sewer network. This will have the biggest impact, with the least carbon intensity. Our recent Suds for Schools

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		programme is a good example of this. Our storm overflows have 98% monitoring in place, allowing near-real time communication with customers and our communities through our Beachbuoy website and via API to the Surfers Against Sewage app. We are always improving the information that we give sea-users and are trialling two water quality buoys in the region. We are working on Pathfinder Projects in partnership with five local communities to reduce storm overflows. Through our Drainage and Wastewater Management Plan we are working hard to deliver healthier rivers and seas. We are building capacity and resilience at our wastewater treatment works to reach 99%+ compliance with treatment and permit standards. This means making sure our pumping stations and networks continue to operate effectively as our climate changes. We are making sure our assets work to capacity. Updating our maintenance standards and proactive control to stop assets failing, and developing an improved emergency response. We are digitalising our sewer network to reduce pollutions and flooding, using industry-leading monitors, artificial intelligence for prediction and maintenance. We will deliver improved training, development and productivity by upskilling our front-line colleagues. Making sure they are multi-skilled and externally accredited to deliver the service our customers expect Our dividend policy aims to ensure a fair balance of reward between customers and investors, and our shareholders strongly support the investment we need to make to improve company performance. We have not paid external dividends since 2017

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Unsure or no / other comment	WRMP034	Comment noted.