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Blueprint for Water response to the consultation on Southern Water's draft Water Resource Management Plan (dWRMP)

Resilience

We support the company's innovative approach to resilience and note that the findings suggest additional abstraction and storage is not the answer to maintaining supply in extreme drought events. However, we are concerned at the pace of the work. We want to be sure that the company takes action to implement innovative solutions over the next management period so the benefits can be realised as soon as possible. We believe that it is essential that Southern Water continues to invest in research and development, so that it can achieve even more through innovation and best practice in the medium to long term.

Catchment management

We welcome the inclusion of catchment management approaches to protect and improve the raw water quality of sources around Brighton, Thanet and Medway, and to help increase the resilience of sources. Although catchment management schemes delivered under PR09 are already delivering environmental and water quality improvements this is the first time we have seen them listed in a company WRMP – Southern Water should be commended for doing so.

However, we feel that schemes delivered under PR09 provide a firm platform for greater water company engagement in PR14. We are therefore disappointed that there is no firm timetable for delivery of the proposed catchment management schemes set out in the dWRMP: it is essential that there is commitment to start to deliver the proposed catchment management schemes over the next three to five year period.

Chalkstreams

Due to the prevalence of chalkstreams in Southern Water's areas of operation we feel the company have a real opportunity to educate customers about the local, national and global importance of the chalkstream habitat. We would like to see mention of the importance of chalkstreams in the WRMP, and Southern Water should show leadership in taking responsibility for protecting this globally rare habitat. We urge Southern Water to promote amongst its customers efforts to reduce the negative impacts of abstraction and of insensitive land management practices on these internationally important rivers. We would also like to see Southern Water encouraging water efficiency amongst its customer base, including through education about the impacts of inefficient water use upon our river and wetland habitats.

Itchen sustainability reduction

We welcome the Itchen Sustainability Reduction, designed to protect the globally rare chalkstream habitat. We are concerned, however, that the potential environmental impacts associated with some of the proposed options this may have been underestimated (identified in Table C of the Strategic Environmental Assessment summary); in particular, the Candover augmentation option (JO3a) and

increased abstraction from Testwood (HSL3). In terms of the increased abstraction at Testwood, we believe that the suggestion in the previous National Environment Programme – that abstraction up to the licence limit would not be damaging to the river – could be incorrect, given previous CAMS studies which demonstrate that the River Test is over-abstacted. We therefore feel that this option will simply move the problem from the Itchen to a less protected river – the Test. This is not sustainable in the long term, so we request that Southern Water looks for an alternative method to achieve the Sustainability Reduction on the Itchen.

We are pleased that Southern Water has recognised the potential adverse effects on the Solent and Southampton Water Ramsar site, Solent and Southampton Water Special Protection Area (SPA), Solent Maritime Special Area of Conservation (SAC) and the River Itchen SAC. We support the conclusion that a Habitats Regulation Assessment should be undertaken at the project application stage for the Ramsar, SAC and SPA sites, to identify further detail on any mitigation necessary to avoid adverse effect on the integrity of the protected sites.

Water re-use

We welcome the options to invest in water re-use schemes within the dWRMP. But we also note that there are a couple of nitrate removal schemes which propose to use conventional methods. We would like to see greater exploration of unconventional methods, such as the use of treatment wetlands to treat waste water, which assists with the indirect potable water re-use process as well as nitrate removal.

Water efficiency

We recognise Southern Water's efforts during the PR09 period to achieve a high level of metering throughout their area of operation. We also support the suggestion that Southern Water undertakes a trial of different tariff structures during AMP6 to provide direct evidence for the viability of tariff options. Reducing demand and improving the value we place on water is key to reducing abstraction and resultant environmental impacts. It also puts the company in a very strong position to better understand what parts of its current approach to water efficiency have had the greatest uptake from, and impact on, customers.

We acknowledge that Southern Water are proposing a wide range of water efficiency measures and activities, but we would like to see the scale and pace of these enhanced going forward, particularly in relation to water efficiency retrofit. In addition, we feel that the reduction in leakage proposed (from 88ml/d in 2015 to 75 ml/d in 2040) is not sufficiently ambitious, given the need to improve longer term resilience and the degree of customer support for a higher level of action.

Innovation in accounting for environmental costs

Southern Water's customers have indicated that they wanted to see increased activity in protecting the environment and rivers. As a result, Southern Water developed a unique and innovative way of accounting for environmental costs in developing the WRMP which, if applied, would have greatly benefited the environment. We are disappointed that the company was instructed not to proceed with this method.

Carbon footprint

We do not believe that a predicted increase of around 5% carbon emissions over the 25 year period is acceptable in the context of UK climate change policy. We accept that Southern Water are putting resources into more supply development/capital schemes, however, we believe that carbon efficiency measures need to be made to accommodate these increases.

Blueprint for Water

The Blueprint for Water coalition is a unique coalition of environmental, water efficiency, fishing and angling organisations which call on the Government and its agencies to set out the necessary steps to achieve “sustainable water” by 2015. The Blueprint for Water is a campaign of Wildlife and Countryside Link. More information is available at www.blueprintforwater.org.uk.

This response is supported by the following eight organisations:

- Angling Trust
- Buglife – The Invertebrate Conservation Trust
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- Waterwise
- The Wildlife Trusts
- Wildfowl & Wetlands Trust
- WWF-UK

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