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CPRE Sussex response to Southern Water's 'Let's Talk Water'

Dear Sir or Madam,

1. 'Protecting the Natural Environment', page 14; you advise that

"We've heard many times how important the environment is to you. You recognise the important role we play in protecting it – but we've not heard a definitive view on whether we should do more to enhance it. This is an important debate as it could transform the way we interact with our local communities. We have to be responsible when we take water from our rivers and streams, and keep those same rivers and streams free from pollution. We also need to protect our beaches and bathing waters from sewage overflows during heavy rain."

1.1. It is the CPRE Sussex view that Southern Water should seek to reverse declines in biodiversity, enhancing as well as protecting the Natural Environment and strengthening and adding to ecosystem services.

1.2 We refer to Defra's 'Biodiversity 2010: A strategy for England's wildlife and ecosystem services' and the Government's "ambition to halt overall loss of England's biodiversity by 2020" and in the longer term, "to move progressively from a position of net biodiversity loss to net gain" (Foreword and paragraph 1.6).

1.3 Please note also 'UK National Ecosystem Assessment Understanding nature's value to society'. Synthesis of the Key Findings' (2011): Chapter 9: 'Freshwaters – Openwaters, Wetlands and Floodplains Key Findings'; findings include:

"Throughout human history, the integrity of Freshwater ecosystems has been traded-off against specific management objectives, with little or no understanding of the true costs. Along with wetland drainage, flood defence and the purposeful and accidental use of Freshwaters for waste disposal, such effects have led to degraded ecological quality, loss of asset value and adverse health impacts. The largest potential synergies in the delivery of different Freshwater ecosystem services are likely to arise where surrounding habitats are managed positively to enhance service delivery" (page 74).

And that:

"We need to restore and recreate Freshwater ecosystems in order to maximise and reap the benefits of the ecosystem services they provide. Restoration may provide cost-effective solutions to the enhancement of key services such as flood risk reduction and water quality improvement. There is a growing inventory of practical

actions and experience throughout the UK which are improving both the technical knowledge base and our understanding of the operational, policy and governmental actions required to reverse the degradation of our Freshwater ecosystems” (page 74).

1.4 Please note, too, one of the ‘Key Messages’ of the UK National Ecosystem Assessment Follow-on: Synthesis of the Key Findings’, page 7, that:

“Actions taken and decisions made now will have consequences far into the future for ecosystems, ecosystem services and human well-being. It is important that these consequences are understood, so that we can make the best possible choices, not just for society now, but also for future generations”.

1.5 Questions:

- (i) What measures will Southern Water take to restore Freshwater ecosystems to maximise and reap the benefits of the ecosystem services they provide?
- (ii) What measures will Southern Water take to reverse declines in biodiversity, to enhance as well protect Biodiversity?
- (iii) Does Southern Water assess in advance and take into account and monitor the impacts of water extraction on flora and fauna?

2. **‘Let’s Talk Water’ does not acknowledge the importance of Ecological Services and does not consider how ecological services could be employed to reduce and mitigate flood risk and pollution.**

2.1 Please note findings of Defra’s ‘What Nature can do for you. A practical introduction to making the most of natural services, assets and resources in policy and decision making. Latest update: January 2015’, page 4:

“Taking the value of the services we get from nature into account in your decisions isn’t an ‘optional extra’, it is central to the Government’s aim to achieve a healthy natural environment by putting it at the heart of policy making because:

- There is evidence we just can’t afford to ignore: The Economics of Ecosystems and Biodiversity¹ (TEEB) is a major international study that is revealing the enormous economic value of the services our ecosystems provide and the very real social and economic costs of their degradation and loss. TEEB estimates that, globally, the degradation of our planet’s ecosystems is costing us €50 billion each year.
- It will help you to avoid significant costs and risks to your policy objectives: The services we get from nature underpin our economic prosperity and social wellbeing and play a fundamental part in a wide variety of Government policy objectives such as public health, economic recovery, sustainable businesses, education, culture, climate change and sustainable transport. Understanding and managing the impact your policies have on the ability of our natural systems to function will help you:
 - to increase long-term resilience of your policies,
 - to reduce risks to your objectives from failing natural systems
 - to reduce public costs from degraded natural services
- It is part of good policy-making: Assessing the general environmental impact of policy options has long been a part of the impact assessment process and it is now possible to make more sophisticated assessments of the, previously less visible, costs to society from damage to our natural assets and economic benefits from managing them well. (HM Treasury Green Book:
<https://www.gov.uk/government/collections/the-green-book-supplementary-guidance>)

(Please see also: <https://www.gov.uk/guidance/ecosystems-services>)

3. On page 15, Southern Water states that “We need to balance the needs of people and wildlife”. Unfortunately, Southern Water’s view of what the ‘balance’ should be and how it would be achieved is not explained.

3.1 We draw attention to the advice given by the World Wild Life Fund (WWF) in its recently released ‘Water for Wildlife tackling drought and unsustainable abstraction’

“In 2011, the UK government recognised that the current water abstraction regime (which controls how much water is taken out of rivers for use by farms, businesses and households) was out of date and not fit for purpose. In its Water for Life White Paper⁸, Defra set out its intention to reform the abstraction regime to ensure sufficient water for wildlife and economic growth. The resulting legislation to make this a reality was due this spring. But in April 2017, in the midst of a developing drought, the minister confirmed that new legislation was on hold due to insufficient parliamentary time to take it forward” (page 5).

3.2 We note also the WWF’s advice in the same publication (page 7) that

“A freedom of information request we made to the Environment Agency in late 2016¹⁰ showed that nearly a quarter of rivers in England are at risk from too much water being abstracted, leaving too little for wildlife:

- 14% are classified as ‘over-abstracted’, meaning water removal is causing rivers to drop below levels required to sustain wildlife.
- 9% are ‘over-licensed’, meaning the river would be over-abstracted if licence holders took all the water they were entitled to.

In addition, 24% of aquifers are classed as in ‘poor quantitative status’ – meaning that water is being abstracted from underground supplies faster than it can be naturally replenished. The resulting diminishing groundwater levels put household water supplies at risk and also hamper the important contribution groundwater makes to river flows during dry periods”.

3.3 These are critical matters and an explanation of what in Southern Water view the ‘balance’ should be, and what measures would need to be taken to achieve that balance, would therefore be helpful.

4. The extent to which the region’s requirement for water is met by abstracting water from rivers and aquifers is not explained in ‘lets talk water’.

4.1 This is a fundamental issue, as is made clear by the WWF report referred to and quoted above.

4.2 We therefore ask Southern Water to provide that information together with its assessment of whether dependency on these sources can or cannot be substantially reduced and over-abstraction avoided – or not. Figures and calculations would be informative, too, please.

5. Unfortunately, houses are sometimes built without providing infrastructure with sufficient capacity to remove and treat wastewater/foul water/sewage, as has happened in the past at Billingshurst, Burgess Hill, Pulborough and Southwater to the detriment of residents and the environment.

5.1 This could be avoided if the appropriate infrastructure with the capacity needed to serve new developments were put in place before houses are built and occupied. Is Southern Water able to this?

6. It would be beneficial to communities if Southern Water were to take part in and be represented at the Examination in Public of local plans. This would enable Southern Water to advise

examining Planning Inspectors on water supply and waste water/foul water matters including funding and time-lines and to clarify where responsibilities lie for their provision.

7. Will an additional reservoir/ or reservoirs be needed in the region to increase the capacity to collect and store rain water? The role of reservoirs and whether there is a need for new reservoirs is not considered in 'Let's Talk Water'.

8. Investing for future generations: Opportunities to innovate, page 17. You advise that longer term you "could":

- "inspire the creation of new integrated water, wastewater and energy networks for new housing and towns in the South East as a sustainable model for the rest of the UK"
- "guarantee resilient water supplies across the region by promoting the development of more water re-use schemes to take advantage of our currently untapped constant supply of wastewater"
- "collaborate with innovators and businesses to develop more local and self-sufficient water and energy facilities which are tailored to the needs of communities and the environment".

8.1 "Could inspire", 'could guarantee', 'could collaborate' indicates uncertainty and seems to suggest that these are options for action rather than commitments to action'.

8.2 Also, 'Could inspire the creation of new integrated water, wastewater and energy networks for new housing and towns in the South East as a sustainable model for the rest of the UK' seems to suggest that bodies other than Southern Water would provide them.

8.3 Clarity would be helpful, please, as would an assessment of what the consequences would be for water quality and supply and the environment should any of these 'aspirations' not be realised.

9. Microbeads and Microfibres. :Some questions

- Does Southern Water have or is Southern Water developing technology to filter out/remove microbeads and microfibres from waste water and sewage?
- Does Southern Water support the banning of microbeads?

<https://www.gov.uk/government/news/government-sets-out-next-steps-to-ban-microbeads>

<https://chemicalwatch.com/54129/microbeads-ban-in-uk-cosmetics-products-expected-by-july-2018>

<http://www.bbc.co.uk/news/science-environment-39217985>

<https://www.theguardian.com/environment/2016/jun/20/microfibers-plastic-pollution-oceans-patagonia-synthetic-clothes-microbeads>

10. 'Providing a constant supply of high-quality water' (page 7): Pesticides:

"We need to be able to respond to new legislation aimed at keeping drinking water safe. How we do this is not just about building more complex and costly treatment processes, it's also about preventing things like pesticides and fertilisers – used by farmers to improve crop yields – from running off the land and getting into rivers and underground natural reservoirs from where we take water to supply our region".

10.1 Is Southern Water providing farmers with information, like the example at:

<http://www.amenityforum.co.uk/downloads/Presentations/Events2016Presentations/AmenityEvent07.04.16.pdf>

10.2 Would SW support this initiative?:
http://europa.eu/rapid/press-release_IP-17-28_en.htm

11. “We currently produce power from waste in Combined Heat and Power plants at 16 of our wastewater treatment works – should we also offer locally-generated electricity to the communities we serve? (‘Let’s Talk Water’: ‘New markets’, page7).

11.1 CPRE Sussex agrees that Southern Water should offer locally-generated electricity to communities.

11.2 We recommend that suitable existing and new housing developments be considered for this form of renewable energy.

<http://www.telegraph.co.uk/news/earth/energy/10508284/Sewers-to-be-used-to-heat-homes.html>
<https://www.theade.co.uk/news/market-news/hidden-heat-in-sewers-could-warm-glasgow-through-winter>

12. CPRE Sussex supports many of SW’s initiatives including:

- campaign for and support developers in building more water efficient homes, including dual water systems, which use high-quality water for drinking and washing and recycled grey water (from baths, washing machines) for flushing toilets
- champion a national water efficiency labelling scheme for bathroom, kitchen and garden products which use water and work with the Government to set minimum standards
- harness advances in treatment technology to build smaller, community-based water supply works so drinking water travels shorter distances and is less likely to be lost through leaks
- reducing carbon footprint and reduce global emissions by investing in renewable energy schemes on sites. **However, CPRE believe Southern Water’s target is set too low at 17%.**
- leading on investigations into what causes pollution in the bathing waters around our coastline – 99% already reach European standards and more than half are classed as ‘excellent’ for water quality. ***But what outflows are still pumping raw sewage into the sea? See:***

http://www.theargus.co.uk/news/8182858.Sewage_pumped_into_sea_near_Sussex_s_finetest_beaches/
<http://www.bbc.co.uk/news/uk-england-sussex-33780203>

13. We ask that Southern Water ramp up their programme to:

- pilot nutrient recovery technology at our works to remove nitrogen and phosphorus from wastewater – the multiple benefits include generating an environmentally friendly fertiliser, a new source of revenue and improving water quality in rivers and the sea.
- guarantee resilient water supplies across the region by promoting the development of more water re-use schemes to take advantage of our currently untapped constant supply of wastewater
- collaborate with innovators and businesses to develop more local and self-sufficient water and energy facilities which are tailored to the needs of communities and the environment.

Yours faithfully,

Vic lent

Dr Roger F Smith
Trustee CPRE Sussex

For and on behalf of CPRE Sussex

Copy to:
Director CPRE Sussex