

# Drainage and Wastewater Management Plan (DWMP)

## Consultation Report Appendices: Consultation Responses

## **Part 1: Stakeholder responses**

### **A: Strategic Environmental Assessment Consultation**

**Response ID:** SEA100    **Organisation:** Chichester District Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Are there any additional plans or programmes at the international, national, regional or local level which have been excluded from the plans and programmes review, which your organisation thinks are relevant to the DWMP SEA?**

No

**Q2: Do you have any comments on the baseline information presented or any additional baseline information you think would be useful?**

No

**Q3: Do you have any comments on the key issues and opportunities identified?**

No

**Q4: Do you have any comments on the proposed SEA objectives and assessment questions/sub-themes?**

We would suggest the inclusion of an assessment question that addresses road transport movements. Options under consideration include the transporting of wastewater to alternative treatment works by tanker. Increased road transport movements has the potential for negative impacts on the environment in terms of air quality, carbon emissions, noise, congestion and therefore it would be useful for this to be specifically addressed through the assessment questions or via a standalone objective.

**Q5: Do you have any comments on SEA objectives scoring criteria?**

No

**Do you have any other comments on the scoping report?**

No

**Response ID:** SEA101      **Organisation:** Natural England

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Are there any additional plans or programmes at the international, national, regional or local level which have been excluded from the plans and programmes review, which your organisation thinks are relevant to the DWMP SEA?**

Natural England suggest Southern Water take into account the Thames River Basin Plan along with the South East river basin district RBMP 2015, as some areas covered in this plan may be relevant to Southern Waters supply area (which is listed in the Regional and Local table page 18). Natural England suggest inclusion of the Southern Water Section 20 work programme though it is noted this may be covered by the drought plan.

**Q2: Do you have any comments on the baseline information presented or any additional baseline information you think would be useful?**

Natural England suggest also looking at Local Wildlife Sites as well as Local Nature Reserves (which are listed in the baseline table)

**Q3: Do you have any comments on the key issues and opportunities identified?**

Natural England would encourage Southern Water to include priority habitat/ species in the assessment questions/ sub-themes.

**Q4: Do you have any comments on the proposed SEA objectives and assessment questions/sub-themes?**

It is unclear from this document alone how the scores/ justifications are met and/or how it has been justified that objectives are not related – for example, protecting and enhancing the quality of the water environment appears to not relate to improving bathing waters, it is unclear how these are not related. This section and the conclusions drawn need to be reviewed.

**Q5: Do you have any comments on SEA objectives scoring criteria?**

Natural England would encourage the inclusion of priority habitat/ species under the NERC act.

**Do you have any other comments on the scoping report?**

Most relevant plans are mentioned in the tables but Natural England would encourage Southern Water to ensure they are used and integrated throughout the SEA assessment.

**Response ID:** SEA201      **Organisation:** Faversham Town Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Are there any additional plans or programmes at the international, national, regional or local level which have been excluded from the plans and programmes review, which your organisation thinks are relevant to the DWMP SEA?**

It is not clear either whether the planned upgrade will be sufficient to cope with the increased volume of wastewater that will result from the current expansion of residential housing in and around Faversham. Rather than increasing the capacity of a facility that is inherently flawed, the Faversham Society urges SW and regulators to think in terms of a more comprehensive upgrade that would see effluent from the WTW discharged via a new pipeline straight into the Swale to a standard that would meet all the relevant European Directives, which still apply.

**Q2: Do you have any comments on the baseline information presented or any additional baseline information you think would be useful?**

Ensure that the network is capable of coping with increased waste water from future development, and the additional challenges of climate change and its impacts upon weather patterns.

**Q3: Do you have any comments on the key issues and opportunities identified?**

Investment program puts too much emphasis on Wastewater transfer, particularly by road. Consideration should be given to connecting existing conurbations and housing currently not connected to mains sewage to the system and increasing storage and treatment capacity, particularly at the Faversham WTW in order to reduce movements by road transport and to build additional resilience to the system. The proposed strategy for north Kent should also include plans to improve the quality of bathing water, and tidal waterways in general in order to protect and enhance the ability of these important resources to be utilised leisure and to enhance the local economy. Investment should also be made to prevent discharges/the risk of discharges in order to protect the environment. Where possible existing combined stormwater/wastewater systems should be separated to further reduce the risk of an accidental discharge during increasingly intense periods of rain within the area, while also ensuring that any system is able to adequately cope with increased population /development and prevent the now frequent surface water flooding across the area.

**Q4: Do you have any comments on the proposed SEA objectives and assessment questions/sub-themes?**

While there are multiple mentions in the SEA of chalk streams as a priority habitat for protection, there is no mention in the DWMP documentation of Faversham chalk streams, notably Thorn Creek and Cooksditch, which both received discharges of raw sewage as a result of the heavy rainfall in August. We were unable to locate, on the SW website, the maps that are supposed to be part of the DWMP consultation. We suspect that the storm tanks at Faversham WTW discharge directly into Thorn Creek and know that, under storm conditions, a SW pumping station near Gordon

Square discharges raw sewage into Cooksditch. As a top priority, both structures must be upgraded to avoid such discharges in future.

**Q5: Do you have any comments on SEA objectives scoring criteria?**

**Do you have any other comments on the scoping report?**

1. The main issue for Faversham is water quality in Faversham Creek as a result of discharges from the Faversham Wastewater Treatment Works (WTW). Even under normal operating conditions, treated effluent from the WTW affects water quality along the entire length of the Creek because it is swept upstream on incoming tides, leaves residues as far up as the Tidal Basin, and is not flushed out immediately into the Swale and beyond. Although the discharges are treated to a relatively low standard, they comply with Environment Agency (EA) discharge consent and so, as far as the EA, OFWAT and Southern Water are concerned, there's no problem. 2. Water quality is poor enough, however, that the recreational use of Faversham Creek for swimming, dinghy sailing, rafting, etc., is impossible and will remain so until either regulations are tightened to require effluent from the WTW to be purified to a higher quality (which is determined by the EA, not SW) and/or the Faversham WTW is upgraded so that effluent can be pumped directly into the Swale instead of the Creek. 3. Under heavy rainfall conditions, storm tanks at the Faversham WTW are designed to store the increased influx of rainwater and wastewater until it can be treated when normal conditions return. Once the storm tanks are full, however, the resulting overflow – including untreated sewage – is discharged directly into the surrounding environment. 4. Regarding recreational use, there is very little mention in the SW consultation documents of either public interest or local communities. Instead, SW is driven by the regulatory texts governing the activities of water companies nationally. It appears to consider its clients to be the regulatory agencies rather than the private, residential customers who provide most of its income. 5. Our understanding from previous interactions with SW is that Faversham WTW is approaching the limits of its processing capacity. Partly as a result, SW recently announced a £2m upgrade of the Faversham WTW infrastructure to reduce the risk of raw sewage discharges and increase processing capacity. While the new investment is welcome, it will not be sufficient to resolve the problems presented above. 6. There is also very little mention in the SW consultation documents of the impacts of Faversham WTW on shellfish, despite the fact that both Central Swale and East Swale are designated as Shellfish Waters under DEFRA's Water Framework Directive (WFD). Untreated sewage discharges from Faversham WTW cause inevitable concerns both about the consumption of shellfish caught or farmed in nearby waters and about the safety of swimming at Seasalter beach, favoured by many Faversham residents, let alone in Faversham Creek itself.

**Response ID:** SEA205      **Organisation:** Faversham Society

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Are there any additional plans or programmes at the international, national, regional or local level which have been excluded from the plans and programmes review, which your organisation thinks are relevant to the DWMP SEA?**

Yes. The new Chalk Stream Restoration Strategy published by the Catchment-Based Approach (CaBA) in October 2021 should also be included. See <https://catchmentbasedapproach.org/wp-content/uploads/2021/10/CaBA-CSR-Strategy-MAIN-REPORT-FINAL-12.10.21-Low-Res.pdf> for details.

**Q2: Do you have any comments on the baseline information presented or any additional baseline information you think would be useful?**

Yes. For Annexe C, Environmental Baseline, Table 14: add “chalk streams flowing into the Thames Estuary from chalk aquifer” to description of North Kent Plain. As for Annexe D, Environmental baseline maps, we were unable to find these on the SW website, or therefore to see whether they feature the chalk streams that are one of the most vulnerable features in the Faversham catchment. Thorn Creek, into which the storm tanks of Faversham WTW appear to flow, is the boundary of the South Swale SSSI / Ramsar site and one of the chalk streams about which we are concerned. Another is Cooksditch in Faversham, which receives discharges from SW infrastructure at Gordon Square, including untreated raw sewage following heavy rainfall.

**Q3: Do you have any comments on the key issues and opportunities identified?**

There doesn't appear to be any consideration of people and their quality of life and wellbeing overtly included, and there should be. For example, Table 2 "policies, plans and programmes reviewed" includes animal welfare but not human. Where do communities feature? They are mentioned in later sections, (6) but is it an afterthought? In 3.3 Key Themes, where are people? Taken for granted? WFD definition of good status "promote sustainable and healthy communities..." . 3.3.2 Shellfish waters included here but not in DWMP, yet DEFRA include The Swale. Section 6.2, table 7: compatibility may vary from area to area. For example, for Faversham catchment, nutrient neutrality and recreation are related, but that is not reflected in the table.

**Q4: Do you have any comments on the proposed SEA objectives and assessment questions/sub-themes?**

No

**Q5: Do you have any comments on SEA objectives scoring criteria?**

No reference to chalk streams (Appendix F) unless included as a “priority habitat.” Best to mention specifically.

**Do you have any other comments on the scoping report?**

Not at this time.





## **B: Drainage and Wastewater Management Plan Consultation**

**Response ID:** DWMP100 **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

I think the planning objectives cover the issues with flood risk. my only comment is related to some of the possible options development scenerios that are looking at SUDs. For new developments the SUDs systems are required to be designed to a 1 in 100 yr +cc risk level, and so is there a mismatch between the 1 in 50 year level used in the risk of sewer flooding planning objective?

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(5) No opinion

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

The sites chosen in the Test & Itchen and New Forest catchments seem to line up quite well with where we have flooding issues.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Groundwater infiltration into the sewer system, particularly in the upper catchments e.g. Test & Itchen. Reducing flow into the sewer systems at source, using NFM where appropriate, SUDs. Surface and waste water separation. Property level resilience. Linking up with flood alleviation work of other authorities e.g. EA, LLFAs, Highways

**Q9: The website helps me to understand the background and process for developing the DWMPs.**  
(1) Strongly agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**  
(1) Strongly agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**  
(2) Agree

**Any other comments or feedback that you would like to give us?**

I think the DWMP process has the potential to be extremely useful in flood risk terms and the improved understanding of who is doing what and how we can mutually benefit each others work can only be a good thing.

**Response ID:** DWMP101 **Organisation:** Portsmouth Water

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

We support the policy for Pollution risk – pollution from any wastewater source on land or in water. However this needs to include pollution mitigation and reduction.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

We support the recommendation to use the BRAVA Methodology to reduce groundwater pollution.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(1) Strongly agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

For Portsmouth Water, old and new developments within our Source Protection Zones and Safe Guard Zones are a priority due to pollution risk and water quality objectives.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

We are part of the DWMP Stakeholder Group so working well with Southern Water.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(1) Strongly agree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP102 **Organisation:** Portsmouth City Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Agree with inclusion of the Additional Planning Objectives below for East Hampshire Reduce Pollution, especially Nitrate to secure nutrient neutrality Solent / shellfish beds. Improve surface water management - to reduce pollution, especially in extreme events due to capacity issues

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

there may need to be an alteration of future BRAVA methodologies in line with Climate Change predictions

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(1) Strongly agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

DWMP will need to be aligned with other investment programmes from other authorities, where there may be opportunity to collaborate and work together to a

shared common goal, which may also lead to cost savings from aligned / combined works

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

**Q10 : I have found the DWMP webpages informative and easy to navigate.**  
(3) Disagree

**Q11: What improvements to the website would you like to see?**

navigating is a little confusing. it would be very helpful to have the questions aside the associated documentation on one page. I like to have the questions directly next to where the relevant text would be. Instead I had two tabs open and had to switch between the two

**Q12: How can we engage you more effectively as we develop the DWMP?**

via email is fine as a starting point. the webinars are also very useful and informative

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

I am pleased to have been involved in the development stages of the DWMP for East Hampshire

**Response ID:** DWMP103 **Organisation:** Brighton and Hove City Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(1) Strongly agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Keen to see 'achieve Good Ecological Status' remain a core planning objective. Ensure more challenging planning objectives to reduce the impact of storm overflows to the environment / property

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

Importance of clarifying the drainage and wastewater systems for further analysis of the causes of the surface water flooding risks. Given climate change and the increasing intensity of storms important to understand properties / infrastructure that could be affected. Modelling more extreme events would help the LLFA Lead Local Flood Authority and highways authorities the risk of associated surface water flooding for which they are responsible, as well as the impact of infiltration on SWS sewer systems.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree



**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

The interaction between surface water, flooding and flooding from sewers in the Brighton / Peacehaven wastewater system to improve the capacity of the drainage network in these areas to convey both wastewater and surface water drainage. Improve the capacity of the wastewater drainage system to cope with 1 in 50 year storm events. Rolling programme of investment in the sewer network that has been identified as in poor condition - for Brighton Peacehaven these are identified as likely to leak sewage which is of concern given risk of groundwater pollution. The primary driver is operational due to the condition of Southern Water's sewers.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP104 **Organisation:** Eastleigh Borough Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

The title DWMP implies that the process is looking at the surface water network as well (not just the wastewater aspect). However looking at the detail, it seems to be looking purely at the sewage network (including combined sewers). Is this correct? Should objectives for the surface water network also be included which often discharge straight into watercourses? P.O. 10 surface water management is only in relation to surface water entering the sewer system - and therefore only focuses on volumes in these systems. Also do these objectives focus only on Southern Water infrastructure or should they include networks (surface water, combined and sewers) in other public or private ownership for a holistic view? For example, many of the pollution problems begin on individual properties via misconconnections.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

Please note that the part of the East Hampshire Catchment (River Hamble and Peel Common WWTW) falls within Eastleigh Borough Council's jurisdiction (in addition to the Test and Itchen Catchment) and therefore would like to be included on the list of partner organisations.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(1) Strongly agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Pollution control. This includes preventing incidents e.g. storm overflows, but also ensuring good quality of water released every day from WWTW and discharge from surface water drainage is maintained (new developments, retrofitting, avoiding misconnections). Parameters to assess WQ, in addition to nutrient neutrality, should include TSS (including fine sediments, in relation to NE's recent requirements re: salmonid spawning gravels\*), and other pollutants (HCs, metals, industrial chemicals - pesticides, detergents etc). Issue was first raised in the EBC Local Plan hearings in Jan 2020. Working with partners to reduce problems at source. Well designed SuDS with effective adoption criteria (EBC is currently producing a SuDS SPD).

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(1) Strongly agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(1) Strongly agree

**Any other comments or feedback that you would like to give us?**

The process has been very inclusive so far. I am unclear on some of the basics though (questions on the first page of this submission). Unfortunately I had IT problems during the on-line sessions I attended so couldn't get clarity on these points at the time.

**Response ID:** DWMP105 **Organisation:** Bosham Councillor

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

PO5 - specific number of hours of Storm Overflow discharge

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

sorry - yet again- the number of hours of CSO overflows and hydraulic overload.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**  
a short email at each stage.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

Actually, without a detailed and long-standing experience of all your WwTWs or the comparative performance in one area, it is difficult to give objective answers.

**Response ID:** DWMP106 **Organisation:** Swale Borough Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(3) Disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

The first 8 objectives of the 14 Planning Objectives (first 6 as defined by Water UK for all water companies and 7&8 by Southern Water) are not really set out as objectives (goals), rather a list of issues. For instance '1. Internal Sewer Flooding Risk' is not an objective – rather it should say (for instance), '1. Prevent Internal Sewer Flooding Risk' ? Objectives 9-14 are set out as goals eg 'Achieve Good Ecological Status/Potential'. The 'objectives' 1-8 as set out should be adapted to include real goals for improvement otherwise they are meaningless as objectives. The titles of the Planning Objectives are not consistent across all tables in the consultation. Eg objective 14. is sometimes 'protect shellfish water quality' and sometimes 'improve shellfish water quality'. These are different objectives and these should be checked and corrected where necessary. Obviously, 'improve' is a more ambitious objective than 'protect' and should be pursued wherever possible. We welcome the addition of the additional planning objectives from the September 2020 Stakeholder Workshops. However, three objectives identified in the September 2020 workshops but not included here are 'increase surface water separation to reduce CSO discharges', 'reduce the cumulative impacts of discharges to sensitive waters' and 'reduce impacts of chemicals and plastics'. Why have these identified objectives not been included (maybe it is explained somewhere in the documentation, but it is not immediately obvious) and how are these useful objectives reflected in the DWMP? A hyperlink to the explanation of why suggested objectives have been rejected would be welcome and useful. Swale Borough contains a number of small streams and ditches that lead from the North Downs (or the aquifer beneath) to The Swale. Watercourses such as these are vital elements of the network of blue and green infrastructure of the borough and serve as important wildlife as well as drainage corridors. Indeed, many of these watercourses are chalk streams, a globally rare habitat, Improving the quality of these receiving watercourses is currently not recognised in the Planning Objectives and should be rectified.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(3) Disagree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

Swale Borough Council (Planning Policy team) consider that Hydraulic Overload is underestimated in the current DWMP and this will get worse with climate change and growth. Currently, this is only identified as a 'very significant' issue for Queenborough in 2020. However, the impacts of this are clear to see throughout the borough at

present and, due to the nature of the the combined sewage system, contributes to internal sewage flooding, storm overflow performance, nutrient neutrality. KCC raised this as an issue in a recent DWMP workshop and also spoke of the opportunities for surface water separation (from sewage). It seems that surface water separation is considered secondary to customer behaviour change and SUDS in this DWMP, but they are all important and should be considered alongside each other as each has a role to play. Swale Borough Council (Planning Policy team) disagree with the BRAVA assessment of bathing water quality which is either considered 'not applicable' (because a wastewater catchment is not linked to a bathing water) or 'not significant' within the BRAVA Risk Assessment. Bathing in this catchment is seriously compromised by water quality, due to the release of untreated effluent into Swale's freshwater watercourses and creeks. For instance, as part of the regeneration of Faversham Creek, local people would like to be able to swim, sail and canoe in the Creek. This is not currently safe to do, due to the escape of untreated sewage into the Creek, which due to incoming tides, can be washed far upstream. This is an issue regarding what monitoring and standards are used (the current monitoring regime and standards are not appropriate) and to be pursued with the cooperation of the Environment Agency, but the 'not applicable' and 'not significant' descriptions of Bathing Water quality are currently misleading. Bathing Water quality is a concern within Swale (many of our beaches were closed over the summer as a result of discharges in other catchments) and it should be recognised as such in the DWMP.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

The investment strategy for the North Kent Catchment does assist with an understanding of SW's strategic intentions. The fact that all of the wastewater systems across the North Kent Catchment have a proposed investment strategy to IMPROVE is welcomed, although it is a sad reflection of the poor quality and lack of sustained investment in the drainage and wastewater infrastructure across the area. Swale Borough Council (Planning Policy team) understand that process for prioritising wastewater catchments in North Kent (from page 37 of the May workshop presentation slides on the website). Maybe this description could be made more accessible in the future? Furthermore, it is a concern that Wastewater systems at Eastchurch and Teynham may be forgotten. Eastchurch is currently identified as having a 'very significant risk in 2020' of storm overflow discharges and Teynham is currently identified as an 'Area of Opportunity' in the Swale Local Plan Review with a potential for over 1,000 new homes. As such, there is an argument for progressing these wastewater systems in the options development and appraisal. More detail on

the investment potential of Southern Water and their funding sources and budgets would be useful going forward.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Separation of surface water systems from sewage as an approach to be considered alongside SUDS and customer education. - Recognition that SUDS is often outside the control of Southern Water. Who would control implementation and monitoring of SUDS and Who would pay for it? - Improved monitoring and standards, including of bathing water quality (working with the EA) - Recognition of level of development across Swale borough, including potentially at Teynham

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(3) Disagree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(3) Disagree

**Q11: What improvements to the website would you like to see?**

The website is informative to an extent as it contained a lot of extremely useful information, but it was difficult to navigate. A Contents page could help with this. To make consultation input easier, this Consultation page should contain hyperlinks to the relevant sections of the website. Missing from the website is mapping of incidents and monitoring locations. These would be extremely useful for the Council and other agencies to see and would be a useful reference point for the community who submit reports of incidents to SW and want to be confident these issues are being followed up.

**Q12: How can we engage you more effectively as we develop the DWMP?**

Recognise the specific concerns of the community (the customers who fund Southern Water) as well as the statutory agencies.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(3) Disagree

**Any other comments or feedback that you would like to give us?**

Whilst Swale Borough Council (Planning Policy team) agree with much of the approach taken and appreciate the workshops to which Swale Borough Council have been invited, Southern Water could engage more directly with the community (the customers who fund you), in particular with stakeholders who have reported incidents, but do not appear to have been informed of this consultation.



**Response ID:** DWMP107 **Organisation:** RSPB

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(3) Disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

The RSPB would like to see full reporting on all 14 objectives to ensure a cohesive evidence base from which assessments can then be made. In addition to the 14 points raised the RSPB would like to see greater emphasis on minimising the damage to the environment both in terms of soils, rivers and seas. Active and measurable steps to improve and enhance nature recovery where damage has occurred. Commitment to aid in significantly reducing run off from farming, agricultural and heavy industry into rivers and sea to improve water quality. Finally ensuring that all waste water management systems and infrastructure are fit for purpose prior to adding additional capacity. Recognition that work needs to be completed in order to bring existing infrastructure up to standard, in order to halt damage to vital designated sites due to poor water quality created by storm drain events where raw sewage is disposed of into watercourses. Southern Water should factor in opportunities for additional objectives should there be links with the with the emerging Environment Act.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(3) Disagree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

The RSPB would like to see greater recognition of the consequences for nature and biodiversity resulting from the events highlighted in the methodologies. There should also be recognition risks arising from cumulative impacts between neighbouring sewerage catchments. It is our understanding that Local Authorities are not fully informed in terms of the issues relating to water quality in their catchments and that these issues should be raised early to inform Local Plans and development capacity. The information is not presented clearly in terms of all risk factors, for example when examining individual documents in relation to specific sites there are different ratings of risk and often these do not align between resources nor does the information align with local knowledge or statutory reports relating to the site.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(3) Disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(3) Disagree

**Additional comments:**

Although 81% suggests a good representative sample, the selection must be based on a working methodology and be representative of the catchments where the largest environmental impact is taking place. There should be an evidence-based justification for the choice of waste water systems.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

RSPB feel it is essential that the investment programme addresses and prioritises historic infrastructure limitations. There is clear evidence that sewerage is regularly discharged into waterbodies, seas and networks, causing damage to designated sites. There should be a focus on reducing environmental impact and commitment to the key themes and messages highlighted within the DWMN scoping report which are heavily focused on nature recovery and positive biodiversity outputs. Investment into waste water management plants and infrastructure to ensure that these are fit for purpose. Transparency where environmental damage is taking place and commitment to eliminate future damaging events. As well as transparency around these issues when working with Local Planning Authorities to ensure that they are informed when there is limited capacity and likelihood for discharge of sewerage if development occurs. Transparency in ability to deliver and the time frame of invested works.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

Greater emphasis and transparency on environmental impacts of water incidents. A page with all the relevant documents listed. An accessible mapping tool, with informative layers, to fully demonstrate the geographical context of water quality issues.

**Q12: How can we engage you more effectively as we develop the DWMP?**

Recorded presentations from workshops available on the website alongside slides. Ensuring relevant stakeholders are engaged by reaching out to Local Nature Partnerships. It is important to also recognise that local differences in knowledge and how much value local site and land managers can add. Therefore ensuring the correct individuals are consulted at all levels is essential. Slow trickle of information and less questions at more regular intervals, the volume of information has been large and sometimes difficult to assess. and local recognition of sites. Ensure high level information is digestible, providing as much summary information as possible.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

We agree with the approach as there is clear commitment through this process to engage with stakeholders and improve environmental outputs, however this must be reflected through the wider actions of Southern Water across the businesses operating locations.

**Response ID:** DWMP108 **Organisation:** Medway Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

One of the planning objectives should involve dealing with planning applications to ensure that development coming forward is suitable.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

Confirmation on the proposed upgrades, enhancement and maintenance for the Medway area to ensure that we are fully aware of the proposals in relation to applications and flooding within the area. It's about transparency.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(3) Disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(5) No opinion

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

There is a need for a focus on improving the existing system within area as well as developing wider objectives. It is noted that applications which seek to connect to the existing Southern Water Systems are having conditions placed on them which try to phase development for larger scheme prior to upgrades to the system being

undertaken however for the Council and developers without clarity on how the connection money will be spent and when the upgrades to the system will be undertaken. This could cause significant issues within the Medway region

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(5) No opinion

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(5) No opinion

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(5) No opinion

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP109 **Organisation:** Gravesham Borough Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Please note that this is an officer level response to the consultation, following engagement through the various workshops you have arranged. The six main planning objectives are defined by Water UK and are required to be reported on nationally within all DWMPs. Locally, SWS has defined additional objectives relating to annualised flood risk through hydraulic overload due to rainfall; WTW compliance with EA permitting relating to dry weather flow; achievement of good ecological status; surface water management and the reduction of associated flood risk; nutrient neutrality; the reduction of groundwater pollution; improvement of bathing waters; and the protection of shellfish waters. Not all objectives will be relevant to all WTW catchments. Because of this, is there not a higher probability that those catchments where all objectives apply qualifying for further analysis? We have not checked whether this is the case but you may wish to do so. Whilst we have no objection to any of the above forming the basis for the Baseline Risk and Vulnerability Assessment (BRAVA), as a LPA planning for future development of the area in accordance with minimum housing requirements based on the Government's Standard Method, a key concern is that the implications of the growth agenda are fully factored into the DWMPs so that critical infrastructure is provided in a timely manner and risk is appropriately managed. This is particularly the case if the DWMP forms the primary basis for future investment decisions rather than a balance being struck between risk and demand over time. You may also wish to consider situations where a WTW depends on an EA discharge licence where this is close to or exceeding current maximum permitted levels or may be exceeded by planned growth even though the catchment is currently performing reasonably well when assessed against the objectives?

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

As above, risk also needs to clearly factor in areas where planned growth may have implications for particular catchments in a transparent way. Whilst Local Plans are factored into your processes, the time frames within which Local Plans are developed and your DWMPs are unlikely to align. Clearly, discussions are on-going between LPAs and SWS in terms of infrastructure requirements to support future development under the duty to co-operate separate from the development of DWMPs and these discussions also need to feed into your plans.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

The question here is wrong - it shouldn't be whether or not this is 'about the right number' rather whether any catchments have been omitted which should be considered and how they are prioritised. For example, should particular objectives be accorded more weight than others in determining priority or are there areas where high levels of growth are assigned that should be looked at irrespective of whether they score highly under the BRAVA.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Much of the issue of hydraulic overload would appear to relate to combined sewers being overloaded due to extreme/high rainfall events where there is a need to ensure SUDS is prioritised in new development and/or retrofitting takes place to divert flows from the foul sewer network. Whilst SUDS can be facilitated in new development through the planning process on major developments, retrofitting is likely to be an issue - it is likely to be costly and complex particularly in urban environments. There are also limited opportunities to divert surface water drainage to (for example) green space where water can be attenuated or allowed to percolate into the ground. The issue also arises as to how such investment is to be funded and/or whether receiving environments put over to SUDS are compensated/paid for the natural capital services they provide given their may be opportunity costs. Consideration also needs to be given as to whether there are any 'quick wins' that can act as exemplars in this respect. SWS also need to give further consideration as to whether it can do more (in partnership with other stakeholders) to promote water efficiency as part of the wider climate change agenda + in order to reduce carbon emissions associated with water pumping and processing. Given issues which arise through fat and other material blocking waste water systems, consideration might also be given (once again in partnership with other stakeholders) to promote proper disposal. Beyond the DWMP process, the issues GBC currently has with SWS relate to handling connections to the network at the development delivery stage and ensuring there is capacity at the appropriate time. However, this is not something that Planning Policy is dealing with and this is being pursued through other channels. Whilst the SWS

digital platform will no doubt improve this for smaller developments (making it easier for developers to go through the process on a stage by stage basis) larger developments may need a more bespoke 'hand on' solution with a dedicated contact assigned by SWS to facilitate - the recent SWS at Brighton accepted that there needed to be a human point of contact where the digital route ran into problems.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

GBC is already engaging with SWS in a number of areas as it progresses it's Local Plan and on the DWMP.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**



**Response ID:** DWMP110 **Organisation:** Sussex Wildlife Trust

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

The Sussex Wildlife Trust (SWT) would like to see full reporting on all 14 objectives not just the 6 national objectives. The 14 have been identified as of importance through local consultation and therefore they should be used to assess the overall picture. We note that some objectives were identified during consultation but were highlighted as being unable to take forward for a variety of reasons. Some of these are link to the emerging Environment Act and we urge Southern Water to ensure they factor in opportunities to review when it is possible to incorporate new emerging objectives.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(3) Disagree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

SWT have clicked disagree as while there are elements we do agree with we wish to highlight the following points for consideration: While we understand what the methodologies have covered we are less clear if they have covered sufficient detail for this stage. SWT also ask questions in related to consistency across methodologies. We focused our comments on the following Brava Methodologies

- Achieving Good Ecological Status/potential
- Secure Nutrient neutrality and;
- Storm overflow performance.

We're keen to understand if cumulative Impacts have been considered in the scoring concept, this is pertinent to the 'Achieving Good Ecological Status/potential'. For example proposed changes in one sewage catchment may impact negatively or positively on another. Is there consideration of cumulative impacts on sewerage catchments downstream to ensure action to improve status is target in the most effective locations? Will an increase in housing numbers in one catchment have multiple impacts further downstream or areas that are current rate as not significant or will the lag in sewerage capacity negatively impact. We're keen to understand how often will this information be reviewed? We note that in the 'securing nutrient neutrality' methodology that there appears to be an uplift in the risk factor for catchments with more than 2000 homes proposed. While we do not disagree with this uplift factor, SWT are keen to understand why this up lift in risk factor has not been considered for other methodologies including Achieving Good Ecological Status and Storm overflow performance. We note that the Storm overflow performance does say that it uses Magic to identify protected sites that may be

impacted, however we are unclear how that impact is translated in the methodology. For example does a spill into a protected site mean that a lower number of spills are tolerated before the risk factor is increased? One final point we would like to question relates to the associated BRAVA RISK Maps. We can see on the map for Achieving Good Ecological Status/Potential, areas around Chichester Harbour are rated as Band 0 (not significant). Yet the Nutrient neutrality risk map for the same area identify it as in Band 2 (very significant). We note the condition review by Natural England for the harbour has identified a large proportion of the Harbour as Unfavourable declining for its biodiversity interest and that there needs to be a reduction in nitrogen sources (including from point sources such as waste water treatment works) in order to address conservation action to help improve the condition of the site. We raise this as we question does looking at the maps individually gives sufficiently accurate picture? We would also like to understand if there are triggers that will cause the methods to be reviewed.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(3) Disagree

**Additional comments:**

SWT are unclear what this question is asking 'if this feels about right' It is SWT understanding that the identification of the 71 wastewater systems has been based on the Brava methodologies which are underpinned by evidence. Therefore Southern water should be able to justify the clear pathway for identifying these 71 catchments. The reason for doubt would surely only come from uncertainty related to the suitability of the methodologies or insufficient on the ground knowledge of each sewerage catchments.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

SWT are keen to understand how this process translates into making on the ground changes happen rapidly enough to address the current impacts. For example we're hearing daily about discharges of sewage into waters, some of which are into protected areas but all of which are hydrologically linked to one another through catchments. How does this process relate to these current issues and how quickly will change happen? Addressing the reason for the current issues and then ensuring investment is factoring in the need to address climate change/resilience is

imperative. We urge Southern Water to make it clear to Local Planning Authorities where they are unable to meet demand for sewerage capacity inline with the house growth so that natural capital can be protected from unacceptable impacts coming from the discharge of sewage

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

A spatial element in relation to the assessment would be beneficial, it maybe that I have missed that on the website. For example, where the immediate action has been identified on a sewage catchment, spatially highlighting those catchments would greatly help when considering other activities in those catchments that may further impact them such as development or other changes in land use. This spatial element could also be of use in term of the emerging concepts of Nature Recovery Networks, having clear information on catchments of concern and proposed works could help guide nature based solutions where appropriate. Equally is important to see where catchments with proposed low risk ratings are situated in order to better understand what is enable the lower risk rating.

**Q12: How can we engage you more effectively as we develop the DWMP?**

SWT have found the volume of information produced difficult to digest at times. We have realised that the input of on the ground local knowledge to 'in effect' ground truth the risk ratings will be imperative as the consultation process moves forward. However given the scale of the task we're concerned about the practicality of this and that key knowledge and discussions might be missed. We have a diverse range of Officers here at SWT from policy focused roles to on the ground delivery. This diverse skill sets can have a valuable input into this process but it might be that the best approach of capturing that input will need to vary.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

We have selected agree to the above question as we can see information has been produced related to early consultation with a range of stakeholders. This has help SWT to better understand the way Southern Water are approach matters related to the DWMP. How the DWMP process now progress within the realities of the pressures we're witness is something we're keen to understand better.

**Response ID:** DWMP111 **Organisation:** South East Water Ltd

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(1) Strongly agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

A circular economy objective to help address options for recycling, carbon neutrality and achieving multiple aims by an approach.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

Improvements on backing data to support choices, some details were missing into the source of the risk i.e. electrical was it power outage, equipment failure, maintenance. Improvements to groundwater how was the baseline decided. It is understood this is still an area under development so appreciate this will improve with time.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(1) Strongly agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

It is difficult to gauge the right level, but agree you have to start somewhere and learn from it for the future. A percentage that almost covers 100% sounds good and assume is an achievable and manageable amount to fully assess and covers both large and small areas.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(1) Strongly agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Focus is likely to be around outfalls/discharges and overflows, this is quite broad but mitigation of these can potentially address other areas of concern.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(1) Strongly agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(1) Strongly agree

**Q11: What improvements to the website would you like to see?**

I think it would be good to get some general public testers to view and comment on this. I have a strong understanding of the water and wastewater industry so understand terminology, budgetary cycles, etc but in some meetings it was clear that others need help in understanding so it would be useful to have their feedback and ensure all round engagement.

**Q12: How can we engage you more effectively as we develop the DWMP?**

Newsletters/update emails. Anything that keeps the communication and two way feedback going and with the wider audience.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

Some of the initial meetings I have attended have had a limited audience and have perhaps been a bit lengthy, but interesting and informative too.

**Response ID:** DWMP112 **Organisation:** Chichester District Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

We support Natural England's response which recommends some additional objectives.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(3) Disagree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

At the BRAVA stage we raised concerns about the small number of WWTW identified as at risk of DWF permit non compliance. It remains unclear why Thornham, Pagham and Loxwood are not identified as at significant risk of DWF permit non compliance in the BRAVA or problem characterisation stages given the number of new homes already permitted or proposed in these catchments compared to estimates of remaining headroom. The list of works identified as at risk under this measure doesn't match the detailed work we have been doing with Southern Water on headroom and trajectories for the Chichester Plan Area. With speculative applications being received for Bosham, this could apply there as well. As an example, PO8 for Thornham states that the predicted DWF in 2050 will be below the current permit, yet work we have been doing with Southern Water's Growth Planning team for the Local Plan review suggests DWF headroom will be reached before 2025 without any additional allocations. We are already putting in place a Position Statement to manage remaining headroom at Southern Water's suggestion. It is similarly unclear why no effect on good ecological status is identified when the works discharges into Chichester harbour. Pagham already has more permissions than remaining headroom, as does Loxwood.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(3) Disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

1) Comments relating to Problem Characterisation ( as there was no box under that) : As above – given the DWMP is a long term plan it needs to take a longer term view of growth. We agree with Natural England’s view that Chichester, Thornham, Bosham and Lavant should all be categorised as top priority (change) as they all discharge into Chichester Harbour. 2) Comments relating to Option Development and Appraisal: We agree with the systems in the Chichester Plan Area taken through to options development and appraisal – although as above we felt some should have been identified as Change rather than improve. However we do have some concerns with the limited options being considered for some catchments and the timetable slippage .

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(5) No opinion

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Water efficiency in new development and existing stock. Vulnerability of existing assets to climate change. Potential increased environmental standards. Current poor performance. Reducing / eliminating discharge of untreated waste.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

No comment

**Q12: How can we engage you more effectively as we develop the DWMP?**

We have been involved in all of the relevant workshops, which has been useful. The BRAVA and problem characterisation workshops were useful in understanding the process. The workshops for the options stage were however disappointingly limited in scope and not sufficiently strategic. It was disappointing that the options sheet for Thornham was missing from the information circulated ahead of that workshop (although it is now on the website). Thornham and Chichester are particularly challenging and the workshop did not allow time for sufficient consideration of the strategic challenges in these locations, with much of the discussion focussing on particular pipes rather than the long term challenge of treating waste water from thousands more homes, in an area constrained by environmental designations. In order to progress our Local Plan we need greater clarity about realistic options, whilst recognising the need to go through further business planning processes and funding. The DWMP process and the discussions with your Growth Planning team need to be more joined up.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(3) Disagree

**Any other comments or feedback that you would like to give us?**

Issues relating to the approach and communications and engagement should be addressed.



**Response ID:** DWMP113 **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(1) Strongly agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

One of the six national planning objectives is 'Risk of WwTW quality compliance failure'. I can't recall a discussion clearly defining what this means. In the EPA we record compliance with numeric permit conditions. But WwTW permits also have descriptive conditions - we think this national planning objective should include descriptive conditions if they don't already. Otherwise it is a very comprehensive list and six additional bespoke planning objectives (to the two SWS has previously identified) is testament to the engagement process and taking on board the views of stakeholders.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(1) Strongly agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

The process diagrams following the explanatory text are very good for clearly setting out how you have banded catchments into risk categories. For future cycles some more debate/agreement with stakeholders could be beneficial to get more buy in to the methodologies. So while we (EA) think the BRAVA methodologies set out clearly the risk thresholds that doesn't mean we necessarily agree with all of the thresholds. For example, for pollution incidents you set the risk thresholds based on Ofwat ODI thresholds and it states 'these targets are stricter and lower than the thresholds defined by the EA in its EPA report'. But the updated EPA, being used for EPA assessment for the first time in 2021 sets more demanding targets - so this now looks like a mismatch in the DWMP. The revised thresholds have been known about in the industry since the summer of 2020. Perhaps SWS could consider setting up a Level 1 stakeholder group to discuss more strategic and policy issues (Thames Water has done this). I might have missed it but I'm not sure there has been much debate with stakeholders over the risk assessment thresholds.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(1) Strongly agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options**

**development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

EA is pleased that wastewater systems covering 81% of your customers has progressed to the ODA stage. It feels appropriate given the scale of the problems in the SE. We feel strongly that the plan should not be pre-constrained by trying to second guess what might or might not be allowed in price limits - the options to manage the risks that have been identified are likely to add up to a significant investment need. But that all needs to go into the PR24 mix when the views of customers and their WTP are elicited covering the full range of investment need.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Environmental water quality currently has a high political profile. Your customers could want all the options you've identified through your ODA process but won't necessarily be prepared to pay for all of them through their bills. Southern Water is a poor performing company based on EPA assessment, recent high profile pollution incidents and legal cases. Your future investment programme must play a significant role in improving environmental performance.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(1) Strongly agree

**Q11: What improvements to the website would you like to see?**

The website is very good. I have no suggestions for improvement.

**Q12: How can we engage you more effectively as we develop the DWMP?**

See previous comment about a Level 1 stakeholder group (I seem to remember you holding a couple of more strategic meetings). If you set up such a group it would need stakeholders to devote time to discussing some key strategic issues (e.g. risk thresholds - see previous comment) i.e. more than 'show and tell'. This would help set the strategic direction and then as before, catchment based workshops to get into the detail of risks, issues and solutions that pertain to each catchment. The regular EA/SWS meetings have been very helpful for us and I trust they will continue with my successor.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(1) Strongly agree

**Any other comments or feedback that you would like to give us?**

Where does climate change feature? Important though it is I wouldn't see it as a specific planning objective but Options developed through the ODA process need to be climate change proofed. It looks as though this is adequately covered in the SEA. I think the engagement process has worked well and there is plenty of evidence that you have listened to stakeholder views and feedback and acted upon it.

**Response ID:** DWMP114 **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(1) Strongly agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

No changes to the planning objectives that have been developed. Southern Water listened to the need for additional planning objectives over those given in the guidance and have developed the additional ones proposed. That was a brave move and reflects the environmental need across the Southern Water area. The important thing is to ensure that the "weighting" is correct so that the new planning objectives are fairly prioritised alongside the given planning objectives when assessing importance. (Failure to do so could lead to important issues easily being dropped when unconstrained options appraisal moves to a more constrained option, especially on longer-term issues that do not necessarily show a quick win).

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

The development of the groundwater risk assessment methodology for BRAVA, especially with some further tweaks of the weighting for Safeguard Zones, appears to have worked well. This was a first stage and it will be good to review it to see if any improvements are required for subsequent rounds. However, while the data and outcomes were strong, accurately depicted on GIS and appeared to give sensibly ranked outcomes the subsequent interpretation of the data to guide reasons for future work appeared slightly less effective. Some staff and workshop members really understood, so were able to develop forward plans. Other staff and workshop members, looking at the same data and information, appeared to struggle for a way forward. This, I expect, has identified an internal training and awareness need.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

It is a start, based on prioritisation, so 71 wastewater systems across the catchments is a good a place to start as any. Whether it is the right number and the right prioritisation will ultimately be decided by whether future schemes lead to future investment and prevent on-going deterioration of the wider environment or not.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

There were common risks and issues across multiple wastewater catchments. It would be good to ensure that issues raised in one catchment meeting are thought about in other catchment meetings that were not as well attended. Key issues seemed to be the opportunities available to decrease surface water run-off in to the sewerage system or to prevent ingress of groundwater in to the sewerage system to help with the hydraulic loading the and the volumes being treated. This needed stronger working with Local Authorities, County Councils and Highways Authority. The work carried out to assess the risks to groundwater showed up some interesting information that has not been considered before. It would be useful to pursue this, not just for the sake of the sewerage network but, for the longer term protection of drinking water supplies, nutrient neutrality and the water and ecology of surface water systems. Maintenance of existing infrastructure at the works as well as the sewers themselves, to ensure it is fit for purpose in the future, taking in to account increased hydraulic loading. Fats, Oils and Grease awareness raising campaigns to help decrease blockages and associated collapses.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(1) Strongly agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(1) Strongly agree

**Q11: What improvements to the website would you like to see?**

Keep up the good work. The website has provided a good overview and has been updated regularly. The more map information that is available the better as that will allow other organisations to input at a greater detail in the future.

**Q12: How can we engage you more effectively as we develop the DWMP?**

While each workshop has brought different issues to the table there has been a lot of repetition. In a way that is good as it allows other organisations to gain knowledge by being at the meeting too. However there were many meetings where it was the same crowd of people in the audience. It might be a good thing to have a few separate meetings with few key individuals from different organisations just so that you can cross-check that nothing has been missed / a common way of working has occurred across your area. For other major infrastructure projects it has been known for the

meeting to be "the other way around" so, for example, a specialist officer from the external organisation (or a few organisations) has been booked for a day - during which each group of engineers within the company have brought their specific case (in this case catchment) forward for discussion one site after another. If you wished to try that at any time it might help save some of repetition. Just a thought.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

I think this has been a good step in the right direction and could be a very powerful way of moving forward to help protect the environment while developing and maintaining infrastructure. The way of working and engagement has been good and should improve as more interested parties become involved. There is a danger with the Source - Pathway - Receptor proposals and the some of the slightly more unsustainable generic Unconstrained Options that have been proposed that real possible future options might get overlooked. This stage been the BRAVA assessment / Unconstrained Options and the subsequent development of future options is critical and is likely to be the make or break of the good work and communication that has been undertaken so far.

**Response ID:** DWMP115 **Organisation:** South Downs National Park Authority

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

The process of developing planning objectives was good with a combination of set objectives and consideration of the needs of individual catchments. I think this flexible and inclusive approach should be continued and this may lead to revised objectives in some catchments next time around.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

I thought these assessments worked well I would only change any areas where there has been an issue on this first run.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(1) Strongly agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(1) Strongly agree

**Additional comments:**

Good to see that selection also related to where most impact can be made at this stage.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

reducing pollution events and contributing to improved water quality. reducing the impact of flooding as we experience increasing heavy rainfall events, potentially through interventions elsewhere in catchments (such as SUDS) to reduce flows into sewer systems.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(1) Strongly agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

Web site is good and explains the process, could possible add a Frequently asked questions section for those that wish to dip in and out.

**Q12: How can we engage you more effectively as we develop the DWMP?**

The approach of using the existing catchment partnerships has been a good one and involves a wide range of organisations, however sometimes this can also mean a wide range of interests. In addition attending several catchment meetings can be resource/time consuming. possibly in future look at also holding some specific topic focus groups

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(1) Strongly agree

**Any other comments or feedback that you would like to give us?**

Approach has been excellent especially as this is the first round of DWMP planning.



**Response ID:** DWMP116 **Organisation:** West Sussex County Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(3) Disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

The LLFA thinks that insufficient consideration has been given to groundwater inundation to the SW network.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(3) Disagree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

My initial thought was that they were very clear and transparent. What gives me cause for concern is that there appears to be a miss-match between the trajectory for new housing, the capacity of the Network (extensions to which it is understood that developers contribute) and the capacity of the WWTWs (where investment is controlled by the business plan). SW advises that they cannot use problems associated with the WWTW as a basis to delay new development. This is fundamentally problematic when there are so many problems with existing WWTWs and these problems persist for the longer term (2050 timescale). Waste Water Infrastructure - network and WWTW fully serviceable operation have to be considered alongside prolonged growth in housing and the investment needs to be brought forward to ensure that upgrades can be made both to the network and to the WWTWs to ensure an end date can be reached when we have a fully functioning system that is not adversely affecting the environment by the very serious risks identified in the BRAVA.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(1) Strongly agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

The wastewater systems selected were chosen as a consequence of stakeholder consultation so yes agree.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(1) Strongly agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

The issue is the massive investment that is needed to address existing problems at WWTW let alone the additional load on these works from projected housing growth. It is understood that the recent £123M of the £126M that SW received in fines is being repaid to customers but this is not helping the shortfall in investment over the past decade!

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

Greater transparency upon how current and planned investment affects the BRAVA process both through the AMP route and the developer funded network expansion.

**Q12: How can we engage you more effectively as we develop the DWMP?**

The LLFA can help you to address the problem by reducing Surface Water flooding that is a major issue for SW. To date, we have received no actual financial assistance for the work we are seeking to do to reduce flooding to the combined network. We would like to see this position change.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(1) Strongly agree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP117 **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(1) Strongly agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Water quality - both surface waters and groundwater, where relevant, should be focused on. There is huge attention being paid to storm spills at the moment but SWS should not look primarily at storm discharges. Network and STW resilience to incidents often cause bigger issues and more significant incidents. Network performance and maintenance is key in most areas as STWs achieving consistent performance.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(5) No opinion

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(5) No opinion

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP118 **Organisation:** Southern Water

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

Primarily, an increased emphasis on drinking water catchments as part of the risk assessment process - for example using the modelled outputs of the Catchment Team that define groundwater capture zones as well as the SPZ boundaries, and prioritisation of action to prevent SWS "own goals" between wastewater and water. Other improvements focused on sewer network risk could include for example: utilisation of a wider array of datasets to understand risk / prioritise sewer integrity investigations e.g. superficial geology, depth to wetted area, relative depth to sewer, sewer diameter, modelled recharge to aquifer (capture zones) where available. All this would improve the methodology for understanding sewer leakage risk and therefore investment strategies. Also accounting for unmapped sewers would be useful. An increased collaboration between the drinking water catchment team and the DWMP team during the risk assessment process, prior to external engagement, is fundamental.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(5) No opinion

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

Fully support the working with other organisations approach, that said please can we ensure that internal stakeholders have been consulted prior to this - there is a lot going on in this arena and so to get the most out of our strategic plans and the many consultations underway, this is an important step to build into the programme.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Drinking water protection (not just groundwater protection). Include adjacent water company catchments in this prioritisation. Maximise nature based solutions to solve multiple issues, and these types of solutions that are more sustainable and involve multiple partners (internal to SWS as well as external to SWS). As well as nature based solutions, a driver for wider sewer network investigations and solutions that can then drive investment strategies in the future. Consideration of hydrological catchments upstream of the wastewater catchments (the latter being the focus so far) and recognition that upstream hydrological catchment work can help with overall resilience of downstream (more urban) water courses. Upstream actions are underway in AMP7 and there are lessons learned that can be ported over for a more integrated "catchment" solution. Increased link up within the company will also help leverage more out of everyday activities e.g. consultations for non-mains drainage, first time sewerage schemes and discharge consent applications etc.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

Engagement between DWMP and Environment & Catchment (water and wastewater catchment) teams to maximise the potential for catchment and nature based solutions to provide benefits for SWS planning objectives and catchment resilience and wider benefits.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

It is certainly a positive step. The timeframes are challenging. External engagement with stakeholders has been extensive and I've heard positive feedback externally. There is now good potential for increased internal SWS collaboration during the options appraisal stage in late 2021/ early 2022 and this will really help to bring things together internally.

**Response ID:** DWMP119 **Organisation:** Wealden District Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

The planning objectives appear to cover the most important areas of concern however there may need to be a greater emphasis on the objectives in future in relation to growth within the catchment considering this is likely to be quite significant moving forward.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

None

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

None

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Given the fact that the catchment(s) are likely to see significant growth coming forward, focus for investment should be on making sure there is the capacity in both treatment and volume at WwTWS to deal with this increase. Investment should also

be made into technologies to ensure that wastewater is treated to the high standards required before it is discharged into the environment and where possible exceeds these standards to ensure the wider environment is protected.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

None

**Q12: How can we engage you more effectively as we develop the DWMP?**

The methods of engagement so far, given the circumstances with Covid-19, lockdowns and remote working, have been very effective and informative. Moving forward, circumstances allowing it may be beneficial to have in person meetings / workshops. However, the information given and the format it was presented in has been very effective.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**



**Response ID:** DWMP120 **Organisation:** Wessex Rivers Trust

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(1) Strongly agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Nature based solutions (NBS) should underpin all future planning objectives to ensure these options and the multiple benefits on offer are taken into account at the earliest stage.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(5) No opinion

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

Due to the globally rare status and unique flora and fauna associated with our region's chalk streams, the Brava method - 'Achieve Good Ecological Status/Potential' should be revised to account for 'High' WFD status targets instead of 'Good'.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(5) No opinion

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Customer's demand for healthier rivers (including less pollution caused by sewage discharge) is increasing. This awareness and demand for higher levels of

environmental performance by water companies should not be underestimated, and therefore factored into the investment programme going forward.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(1) Strongly agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP121 **Organisation:** Southampton City Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

More emphasis on surface water flooding, including sustainable drainage and water reuse.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

There appears to be adequate description for each BRAVA point as there is a separate pack for each. Having reviewed the assessment for Improving Surface Water flooding, it is not entirely clear whether the definition of sewer flooding is foul, combined or just a surface water system. From a LLFA, customers have informed us (as well as our own experience of reporting issues to Southern Water customer service centre) that there are challenges in reporting anything other than foul water flooding or blockages. No-one from Southern Water has approached Southampton City Council to understand the data we hold on surface water flood incidents despite assessment point 2.4 stating that Southern Water are approaching LLFAs to share data. Surface water, either issues with capacity within a separate surface water system, or ingress into a foul sewer are at risk of being ignored.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(4) Strongly disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

I have not seen any information on the investment strategy for each wastewater system, and would be keen to see the investment being made within my RMA area. It is essential to consider how surface water systems will be managed in future, with above ground systems to slow the flow or retain water before it enters the system

most valuable. Southampton City Council will be keen to work closely with Southern Water as recognise the importance of water as a resource.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

More investment into sustainable drainage systems, even if this is making partnership contributions available to other RMAs/LLFAs to take forward surface water schemes where it matters the most. More focus on being proactive in preventing issues before they exist. Better understanding where the issues are with a focus on improving wastewater issues where they are likely to be having an impact on the environment, e.g understanding why some areas have high CSO spills - could this be addressed by taking surface water out of the equation through more above ground SuDS?

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

Some of the documents are quite lengthy (e.g. the methods to each BRAVA/objective). It might be easier if there was a summary page or visual of each of the key points, or a short video to explain the importance.

**Q12: How can we engage you more effectively as we develop the DWMP?**

Catchment focused workshops are most useful as it can target discussion - early workshops provided snapshots of the information coming out of assessments etc, but did not show my RMA which made it feel difficult to comment or share my opinions. Follow up surveys (similar to this consultation) makes me feel more able to provide the feedback outside of the workshop, and feels that comments will be captured (some of the workshops it didn't feel like concerns of attendees were being considered adequately)

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

Please consider more about surface water issues, as this will go a long way in helping to reduce the pressures on foul water systems.

**Response ID:** DWMP122 **Organisation:** Kent Wildlife Trust

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(3) Disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

I am concerned the planning objectives do not go far enough in covering the waste water issues across all catchments. The prioritisation means some catchments are left without much intervention when they all require investment. I think the level of issues means that dealing with just the 'most important' still misses a host of very important pollution issues.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

Bigger emphasis on the risk of storm water events in light of climate change, bigger risk associated with run away developments and many more houses built without major sewage infrastructure improvements contributed to by the developer.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(3) Disagree

**Additional comments:**

From my experience on the ground in Kent, all wastewater systems need review and investment. Not just 81% of them.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

housing developments, increasing populations, climate change induced storm events.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

n/a

**Q12: How can we engage you more effectively as we develop the DWMP?**

n/a

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP123 **Organisation:** Gosport Borough Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Gosport Borough Council is very concerned about the Very Significant risks facing Peel Common WWTW over a range of critical issues including Flooding, Storm Overflow, Compliance Failure, Flow Compliance, Nutrient Neutrality, and Shellfish Waters. We are pleased to see that Peel Common is a 'High' level of concern for the company and has a proposed investment strategy of 'Improve' - which we fully support. We would like to see this essential investment delivered as soon as possible and to the highest standard achievable, to minimise any future risks to the local environment, wildlife, residents, and bathers. Tourism, particular along Gosport's coastline, is of high importance to the local economy and any water

qualities incidents is likely to have a significant detrimental impact upon this. In addition, relieving the nutrient neutrality issue will help support the local economy and housing delivery, which is currently under a lot of pressure. For these reasons, and the interconnected nature of the Solent and all water bodies, we are also concerned about the future performance of Budds Farm WWTW, which also has numerous 'Very Significant' risks, as well as the other WWTW within our catchment and welcome further substantial investment at all of these facilities.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(3) Disagree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(3) Disagree

**Q11: What improvements to the website would you like to see?**

The DWMP is difficult to find and split into sections which can made it slow to read through. One central document on the first webpage you land on would be preferable.

**Q12: How can we engage you more effectively as we develop the DWMP?**

Webinars

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

We welcome the proposals and investment strategy proposed by Southern Water and would like to see them implemented as soon as possible. We hope that Ofwat will also support increased investment into the local water network, however not at the cost of substantial increases in customer bills.



**Response ID:** DWMP124 **Organisation:** Tunbridge Wells Borough Council  
(Planning Policy)

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(1) Strongly agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

As a planning policy officer, I don't think there are any objectives that I would like to see changed at the moment. It is noted that some of the DWMP objectives align with the objectives TWBC has for planning policy water related issues in our emerging Local Plan, which is good.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

The risk assessments cover a wide range of areas/issues and I don't think there would be any additional ones which would be applicable to Tunbridge Wells borough

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(1) Strongly agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(1) Strongly agree

**Additional comments:**

None

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(1) Strongly agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

For the Tunbridge Wells area - Internal Sewer Flooding, Pollution Risk, Sewer Collapse Risk, Sewer Flooding in a 1 in 50 Year Storm, Storm Overflow

Performance, Flooding due to Hydraulic Overload, Wastewater Treatment Works Dry Weather Flow Compliance

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(1) Strongly agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(1) Strongly agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

I think the communication has been good so far in terms of the workshops I have attended and receiving emails from Sally Beck with updates

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(1) Strongly agree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP125 **Organisation:** South East Rivers Trust

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

A stronger commitment to addressing WFD failures. I believe that currently water companies are only dealing with these issues if they can secure an elemental improvement in WFD classification or if they are the only impact causing a failure. In the South East of England rivers are under multiple pressures and if water companies are not going to address their impacts why should others? This sends the wrong message.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(5) No opinion

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

WFD, climate change adaptation and halting damaging CSO discharges.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(5) No opinion

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

Active engagement with Catchment Partnerships at their regular quarterly meetings should be a priority, these are the forums established by the government scheme the Catchment Based Approach and members of these groups have the information you require. Funding eNGOs on either a partnership basis to contribute to the plans development or to convene Catchment Partnership meetings where you can access the knowledge you require.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(3) Disagree

**Any other comments or feedback that you would like to give us?**

Consultation has been too time consuming and hasn't been at the right time or with the right information to make good use of partners time.

**Response ID:** DWMP126 **Organisation:** Rother District Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Additional Planning Objectives could include: reducing the number of misconnections to properties; reducing the risks resulting from poor infrastructure conditions; and the protection of environmentally sensitive areas.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

The methodologies could better show the process by having a short executive summary style opening to help provide a simple summary for those less familiar with the rationale for the Objectives. Additionally, it might be beneficial to include the Regional BRAVA risk maps with the methodologies to help with providing a summary of the issues. Thirdly, it would be useful to provide more links to where the data (if publicly available) is located so that users can find any available source data more easily.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(3) Disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Building new and improving existing infrastructure to meet the demands of new residential developments should be a major focus going into the future as improving the capacity of the wastewater network should help to reduce the likelihood of adverse pollution and/or discharge. This hopefully should assist in meeting environmental objectives, such as achieving good ecological status. As of now, there are few details for how the Investment Strategy will be completed (this is known to be coming in more detail at a later date). There appears to be a wrong link on the Problem Characteristics page of each catchment which should be a document of the Investment Strategy for each catchment. However, the only information available is for those progressed in this first round of DWMPs. For these few, each wastewater system has a summary (in good detail) of the issues already flagged and the overall Investment Strategy (Improve for all those in Rother District Council).

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

One improvement would be to have a page for each river basin catchment dedicated to having all the documents/evidence in one place to make cross-referencing easier.

**Q12: How can we engage you more effectively as we develop the DWMP?**

Having more discussions with the Council individually will help us gain more understanding of the direction of Southern Water and the DWMP. Workshops with other organisations would also be beneficial as it could highlight opportunities for collaboration in helping to address wastewater issues that have a cross-boundary effect.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP127 **Organisation:** Horsham District Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Water Nutrient Neutrality will become a "hot topic" in the near future"

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Water Nutrient Neutrality and Water Supply Neutrality

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**



**Response ID:** DWMP128 **Organisation:** Canterbury City Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

No changes, it seems comprehensive

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(5) No opinion

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(3) Disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

Feels like proportionate coverage but we are concerned that Newnham Valley Preston, which has very significant issues with nutrient neutrality and is included within the scope of the Stodmarsh advice, has not been taken forward into options development and appraisal.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

When you click into the Programme page of the Stour section it looks like it takes you to a page for Adur and Ouse

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP129 **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Southern Water knows the waste water catchment better than other stakeholders, so assume your work and the input of EA and others has given you a well balanced position.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

Clearer link between the most significant risks, levels of spills - and the actions being developed to address these.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(5) No opinion

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

Depends on how many other rounds there will be, but sounds like this is the majority.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(1) Strongly Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

All the significant risks that have been identified.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(5) No opinion

**Q11: What improvements to the website would you like to see?**

I have relied on the information provided at the consultations. Not sure what the time lag is between the consultations and the updates on the website.

**Q12: How can we engage you more effectively as we develop the DWMP?**

I am already engaged. I think the actions will overlap with other drivers, so the issue is likely to be how these are coordinated, ie: • Surface water management plans, Biodiversity Action Plans, Local Nature Recovery Strategies by the councils, • RBMPs – EA and catchment partnerships; • DWMP and WRMPs by water companies; • Probably more to come! Catchment partnerships are probably the best ways to do this.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

I've made this point at the meetings – the problems should clearly involve other stakeholders, eg Highways England, the highways departments of councils, developers and planners – to tackle the high levels of surface water from roads and roofs. The meeting notes record ideas on how to handle excess water – but we need to recognise at this unconstrained stage the opportunities for: • Other sectors – eg agriculture/ horticulture and winter storage ponds and possible use for untreated surface water for irrigation etc; • Biodiversity and wetland areas – so the locations will be critical.

**Response ID:** DWMP130 **Organisation:** Maidstone Borough Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Proposed development growth and impact on the sewer systems

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(3) Disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(3) Disagree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(3) Disagree

**Q11: What improvements to the website would you like to see?**

Link better to what you are asking in the consultation and follow a staged process

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP131 **Organisation:** New Forest Catchment Partnership

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

The planning objectives place understandable weight on availability of data and the more easily understood issues. There is a risk however that due to the complexity of ecological issues in part of the Southern Water region, and the challenge of monitoring habitats and species, that as consequence important ecological and nature recovery issues are not prioritised. Cumulative impacts from all discharges.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

The recognition of the current and future challenge of climate change is supported, particularly in respect of spills and flooding which are only likely to become more frequent unless action is taken. We believe if Southern Water can demonstrate effective leadership by recognising and putting into place the right actions at the strategic level, it is likely the Partnership can assist with collaborative activity with communities at the more local scale.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(3) Disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(3) Disagree

**Additional comments:**

The Lymington and Beaulieu catchments are probably where the Partnership considers additional attention is most merited, however, from the Partnership's perspective the East Boldre and East End works would also be worthy of prioritisation to support objective PO9.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

The in-combination nature of a variety of sources of nutrient and recovery of nature in one of the most important areas for freshwater wildlife in the UK. Recognition of designated site condition and the government's 25 Year Environment Plan in the planning objectives and further decision metrics.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10 : I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

The website information has been effective. However, currently the DWMP language and information is fairly impenetrable to some stakeholders and we recommend consideration is given to production of a simple written summary for each asset explaining why the adopted screening criteria and data means it has not been taken forward - whilst we understand the tables and technical summary report do present some of this information, the rationale is not always clear to a non-water industry stakeholder.

**Q12: How can we engage you more effectively as we develop the DWMP?**

The Partnership acknowledges the lengths Southern Water have gone to in engaging stakeholders in the development of the DWMP/catchment wastewater plans. The use of online workshops , and opportunities have been provided for follow-on liaison.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

Capitalise on opportunities and potential legal requirements to prioritise additional wastewater catchments in respect of nutrients, as well as building on nature recovery objectives and action.



## C: River Basin Catchment Consultation

**Response ID:** RIV100      **Organisation:** Horsham District Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Adur and Ouse

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV102      **Organisation:** Chichester District Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Arun and Western Streams

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(3) Disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

We support Natural England's response which recommends additional objectives.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(3) Disagree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

At the BRAVA stage we raised concerns about the small number of WWTW identified as at risk of DWF permit non compliance. It remains unclear why Thornham, Pagham and Loxwood are not identified as at significant risk of DWF permit non compliance in the BRAVA or problem characterisation stages given the number of new homes already permitted or proposed in these catchments compared to estimates of remaining headroom. The list of works identified as at risk under this measure doesn't match the detailed work we have been doing with Southern Water on headroom and trajectories for the Chichester Plan Area. With speculative applications being received for Bosham, this could apply there as well. As an example, PO8 for Thornham states that the predicted DWF in 2050 will be below the current permit, yet work we have been doing with Southern Water's Growth Planning team for the Local Plan review suggests DWF headroom will be reached before 2025 without any additional allocations. We are already putting in place a Position Statement to manage remaining headroom at Southern Water's suggestion. It is similarly

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(3) Disagree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**  
(3) Disagree

**Additional comments:**

BRAVA: We agree with Natural England's view that Chichester, Thornham, Bosham and Lavant should all be categorised as top priority (change) as they all discharge into Chichester Harbour. Problem characterisation: The catchments identified as at risk of DWF compliance failure did not match the findings of work we have been doing with Southern Water's Growth Planning Team to understand where headroom for growth is limited without improvement schemes. Options Development and Appraisal: We agree with the sites that progressed to this stage. However as above we feel some should have been identified as change rather than improve.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**  
(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**  
The Investment programme needs to be clearer about how it is considering the vulnerability of existing assets to sea level rise and other impacts of climate change.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

In order to progress our Local Plan we need greater clarity about whether there are realistic and deliverable options to treat waste water from future growth, whilst recognising the need to go through further business planning processes and funding. The DWMP process and the discussions with your Growth Planning team need to be more joined up. Detailed comments on the generic options and screening are set out below: Thornham: The generic options assessment table says: The causes of risk are not due to where our systems discharge to the environment or our ability to increase the capacity to connect more homes. Transferring wastewater for treatment elsewhere will not reduce any of the significant risks in this catchment. We disagree with this – we have been in discussion with your colleagues over the last 2 years about the need for extra capacity to accommodate future growth across the Chichester Plan Area. This is particularly the case at Thornham because of significant additional housing committed and proposed in the catchment in both Havant Borough and Chichester District. Remaining DWF headroom is almost used up by existing permissions before we even consider the impact of future planning applications or allocations, so considering a longer term solution cannot wait until we have an adopted Local Plan ( for which we in any case will need to demonstrate that solutions can be found) . As the location is environmentally constrained, discharging into a protected site, the Environment Agency has advised the DWF permit cannot be increased. Southern Water colleagues have also advised that there is no straightforward way to increase treatment capacity here. Alternative long term solutions need to be considered, such as long sea outfall or diverting flows to other catchments, or something else. If there is no deliverable solution this also needs to

be clear to inform both plans being prepared and applications being submitted now. We have been working closely with Southern Water and the Environment Agency to prepare a Position Statement for Thornham and a Statement of Common Ground for the Chichester Plan Area. The Statement of Common Ground looks to the DWMP as a key mechanism for exploring “non standard” options for Thornham. It was disappointing that this key issue did not seem to be recognised at the workshop, and that the info circulated ahead of the meeting did not contain the options sheet for Thornham, which I have since found on your website.

Bosham: As with Thornham, this is constrained by the fact it discharges into a protected European site. So there are risks associated with discharge location and ability to increase capacity.

Lavant: Same point.

Chichester – no specific comments. The option to transfer water elsewhere is reflected here.

Loxwood – we have not yet been invited to a workshop for this catchment and understand it has been delayed. Additional capacity is needed beyond the current permit. Potential to increase DWF permit might be appropriate?

Pagham: Same concern about the discounting of risks associated with the discharge to the environment and ability to increase capacity. Planning permissions already exceed remaining headroom with ongoing pressure for more development in the catchment. Although we are aware of an improvement scheme, that is presumably only designed to cope with growth in adopted plans – need to look further ahead and to allow spare capacity for speculative applications as well as growth in future plans given government ambitions for housing delivery. Particularly as it is understood some development in this catchment is already to be diverted to Ford or Lidsey. Our detailed work with Southern Water colleagues suggests capacity will be used up by 2025. Good ecological status risk (PO9) should be higher than 0 given discharge into a designated site.

Sidlesham: Discharges to Pagham Harbour so environmentally constrained. PO9 risk should be higher than 1. WWTW is at risk of flooding due to sea level rise so may need to be relocated.

Tangmere – no specific comment. Capacity likely to be reached well before 2050.

All WWTWs/ general points: Options for relocation of WWTWs at future risk of flooding in light of climate change need to be considered. Is there an option to consider a new larger treatment works in a new location to replace multiple small works?

It was disappointing that we did not actually look at the options tables in the Chichester, Thornham, Bosham etc workshop, with the options sheet for Thornham missing from the circulated material. Too many catchments were covered in one session considering significant challenges associated with the works around the harbour and future levels of growth. There seemed to be a lack of awareness of the likely scale of growth in this area. The process didn't feel strategic but rather focussing on individual pipes, which didn't need our strategic policy input. Thornham and Chichester are particularly challenging and the workshop did not allow time for sufficient consideration of the options to meet strategic challenges in these locations, with much of the discussion focussing on particular pipes rather than the long term challenge of treating waste water from thousands more homes, in an area constrained by environmental designations.

**Response ID:** RIV103      **Organisation:** Arun District Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Arun and Western Streams

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Emergent issues around nutrients and water neutrality and designated sites (e.g. Arun Valley SPA), Ensure that the modelling and forecasting reflect the latest EA sea level projection, peak river flow and rainfall intensities. the cumulative impacts of development, particularly important when focusing on Pagham Harbour. A full assessment of the risks posed by climate change be taken into account, especially looking at the role and location of existing assets. Larger scale consolidation/augmentation or relocation maybe needed for any assets. This may be especially pertinent to the Manhood peninsula and/or coastal locations. A more holistic and strategic approach be investigated including objectives that decarbonise the WwTW infrastructure in terms of renewable energy and in particular the scope for pumped water storage. Southern Water needs to set out via the DWMP how the company can be interventionist and proactive on combatting the impact of blockages in the sewer network and consequent storm related back surges within properties (e.g. in the Pagham and Yapton catchment areas). E.g. consider appropriate penalties/charges to deter inappropriate flushing of wet-wipe and fatty waste products as well as a public information/guidance and campaigns; including Southern Water's operational response to such incidences.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(3) Disagree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Consideration to be given including the role of recommissioning redundant plant/equipment and infrastructure for pumping, treatment or storm storage and short to intermediate term remedies. It seems that there are assets that could potentially be reused in an active way to help towards some solutions. Groundwater flooding is a significant issue especially impacting the Lidsey area. Southern Water to clarify in the DWMP action to address East of Arun catchments surface run of capacity – e.g. impact of development within Arun and Worthing e.g. on Ferring rife incidence of storm water discharges. Southern Water to consider and clarify their role in the DWMP for assisting with nature based water storage (e.g. SUDs, wetlands etc.) solutions – including in terms of design policy standards, operation and offsetting infrastructure planning to serve developments and collaborating with other

stakeholders and agencies in delivering 'nature based' water storage solutions e.g. wetland habitats which deliver both biodiversity net gains and carbon sequestration. Opportunities for water storage needs to be balanced with the need to remove water from the land quickly out to sea because of the high coverage of surface water flood risk across Arun. In the scoping the feasibility of recommissioning of redundant/disused assets (e.g. for pumping, treatment or storm water storage) to attenuate current and emergent problems - due care be given to ensure that this does not lead to inadvertent issues e.g. resumption of pumped outfalls to sea at Pagham etc. This includes assessing measures to address carbon reduction and renewable energy solutions e.g. pumper water storage etc.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(3) Disagree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(3) Disagree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(3) Disagree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Establishment of development headroom within connected planning authority areas for impacts on and of Dry Water Flow calculations. More guidance to be produced (e.g. to ensure robust construction of foul drainage connections where the groundwater is high) and strongly enforced to prevent future infiltration, which is a significant issue for a large proportion of Arun District. Tide locking and high water levels will mean that certain solutions (e.g. extra storage via SUDs) may not always be appropriate. Southern Water's supporting evidence for the DWMP identifies Ford WwTW bottom of the list for capacity/performance and therefore, needs priority investment urgently (given its strategic significance for facilitating planned growth in the adopted Arun local Plan). Arun is a key tourist destination with a dependent visitor economy reliant on clean bathing beaches –consequently, there needs to be urgent action to prevent the incidence of licensed and unlicensed combined storm/foul waste water discharge to the sea at outfalls affecting Arun's key bathing facilities with climate change likely to increase storm rainfall.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

A clear set of comprehensive documents need to be issued on wider strategic issues that affect the whole region, such as that of nutrient neutrality, particularly nitrates although phosphates and others also apply.



**Response ID:** RIV104      **Organisation:** West Sussex County Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Arun and Western Streams

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(3) Disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Groundwater infiltration to the Network

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Groundwater infiltration. The long-term issue of tide-locking to both surface water and foul sewers caused by projected sea-level rise between now and 2021 (about 1.5m increase in MSL).

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(4) Strongly disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(4) Strongly disagree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

There is a mismatch between projected housing and associated population growth, and overall capacity of waste water infrastructure. This is considered to be because any conditions to delay approval / construction of new homes is related to network capacity only not to the necessary investment needed to upgrade WWTW. Otherwise, why would so many WWTW still show very serious risks for the 2050 timescale. Furthermore, particularly significant to this catchment, is the seasonal increase in load on the capacity of the network from seasonal visitors and from the

workshops there was not a clear message that these are fully taken into consideration in terms of load / capacity of the network / WWTWs.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

The almost routine discharge of flows through CSOs is a huge issue and very detrimental to the sensitive environment and this should be a priority.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV105      **Organisation:** Rother District Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Cuckmere and Pevensey Levels

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Additional Planning Objectives could include: reducing the number of misconnections to properties; reducing the risks resulting from poor infrastructure conditions; and the protection of environmentally sensitive areas.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

No.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(1) Strongly agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(1) Strongly agree

**Additional comments:**

The wastewater catchments that serve the greatest population seem to have been chosen which means any investments will be helping the greatest number of people. On the assumption that the more populated areas are likely to get bigger faster than the smaller villages, it also hopefully means that there will be sufficient infrastructure present to support future growth.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Building new and improving existing infrastructure to meet the demands of new residential developments should be a major focus going into the future as improving the capacity of the wastewater network should help to reduce the likelihood of adverse pollution and/or discharge. This hopefully should make meeting environmental objectives, such as achieving good ecological status, easier as the wastewater will not be discharged in environmentally sensitive locations. Rother District Council is particularly keen to ensure that Southern Water plan for and deliver strategic improvements to the waste water network infrastructure so that current issues of connecting to the network are resolved quickly and appropriately in order to ensure development can take place in a timely manner and as projected. This has been a particular issue for the large allocated sites coming forward for development around Bexhill, where despite regular meetings over many years between Southern Water, landowners and housing developers – co-ordinated and chaired by Rother District Council - and assurances from Southern Water, the necessary infrastructure has not been delivered.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

The Source-Pathway-Receptor model helps to provide a consistent format for options across the whole of Southern Water and also highlights what could be done further down the line. However, at this stage the generic options do not yet provide the level of detail some may want (even at this early stage) for how their specific wastewater system will be improved; the generic options only provide so much detail as to the direction of investment.

**Response ID:** RIV106      **Organisation:** Fareham Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

East Hampshire

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Fareham Borough Council considers that a new planning objective around remediating and recovering already impacted and failing waters should be included. The Solent which the East Hampshire River Basin Catchment flows into, is designated for its importance to wildlife and previous failings around water quality have led to a deterioration in these designated sites. In line with the Water Framework Directive and the Habitats Regulations, strong efforts should be made to rectify and improve current failing conditions and ensure the important designated sites in the Solent are returned to a favourable status. Fareham Borough Council would also encourage consideration around the role of plastics especially microplastics within the water environment. It is recognised that plastics enter the environment from a number of sources including the wastewater system. Linked to improvements in water quality, Southern Water should assess how future upgrades to the wastewater treatment works could help tackle this issue.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Fareham Borough Council considers that the major drainage and wastewater risks for the East Hampshire river basin catchment have been highlighted.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(1) Strongly agree

**Additional comments:**

Fareham Borough Council is fully supportive of the inclusion of Peel Common wastewater treatment works into the options development stage. The Council considers this treatment works a high priority for Southern Water in light of planned future growth and the deteriorating water environment that exists in the sub-region. However, the Council considers that the proposed investment strategy for the wastewater treatment works of Peel Common and Budds Farm should be amended from 'Improve' to 'Change'. This is considered necessary due to the number of very significant risks identified against several of the planning objectives and the urgent nature of the associated risks particularly those that have until recently led to a moratorium of housing development in south Hampshire. Significant environmental improvements are required to ensure that the deteriorating water environment in the Solent area is not exacerbated by predicted development growth in the sub-region and should be significantly improved. It is for these reasons that the investment strategy for Peel Common and Budds Farm is amended to 'Change' to ensure these two major wastewater treatment works comply with the relevant licensing and legal obligations.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Fareham Borough Council considers that Southern Water's future investment programme in particular should focus on tackling the significant issues around storm overflow performance and nutrient neutrality. The Council sees these two issues as interrelated because both are viewed as contributing to the deterioration in the water quality of the Solent. As Southern Water is aware, high levels of nutrients entering the Solent is causing an adverse effect on the designated sites in the Solent. One such impact pathway has been identified as through wastewater production both treated (through current treatment work operations) and untreated (through sources such as storm overflows). Significant environmental improvements are required alongside any technical solutions to restore the water quality of the Solent to favourable levels.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Fareham Borough Council is grateful to have been given the opportunity to attend the DWMP workshops and be consulted on the outputs to date. We look forward to continuing work and engagement with Southern Water as the DWMP progresses further.

**Response ID:** RIV107      **Organisation:** Portsmouth City Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

East Hampshire

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

cant think of any glaring omissions

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Seems all risks are covered. i found the use of PO confusing as this is also Portsmouth postcode prefix !!

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

an awareness of the Local Plan and most recent development projections

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Portsmouth City Council has previously identified some flood risk reduction measures such as surface water separation schemes that may be relevant to achieve the BRAVA objectives for East Hampshire. these are available to discuss / share in the options development stage



**Response ID:** RIV108      **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

East Hampshire

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Can't think of any more. If there are other rounds of DWMP presumably there will be a chance to revisit this, as we all become more familiar with the issues. Also if you are addressing 80pc of the issues that sounds a sizeable chunk of the problems.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(1) Strongly Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

No, although I am not clear how some of the 'significant risks' in 2020 are no longer risks in 2050.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(5) No opinion

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

Its important to include the wider opportunities and not just address waste water issues, ie need to align with other environmentally-influencing strategies and consider how we work with other environmental and economic concerns, ie summer water shortages, nature corridors.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

This will help us align with other maps ie Local Nature Recovery Plans (being considered), biodiversity opportunities, LEP plans etc.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Aligning with other environment strategies with councils and others. Considering resources of councils and other stakeholders and how they should contribute and time involved – especially if they are working unpaid. Consider how local communities and lower level groups can get involved, eg:

- providing more space around developments and roads to capture/ slow run-off. Potentially have settlement areas so the most polluted particles can settle out. Need buy-in of local authorities, developers, Highways England (main roads) Hants CC for smaller roads.
- using excess water in sectors and seasons when water is lacking – create winter storage areas to capture water for use by horticulture, agriculture, but also provide wetlands for nature. To do this we need to know where the main assets and areas that are at risk of spills, so EHCP can understand what other interests can get involved, eg create a wetland that links to another nature-rich area to make a wildlife corridor, proximity to farmland so water could be re-used without treatment.
- encouraging reduced water consumption by residents and businesses, and use of water butts, creation of 'rain gardens'.
- encouraging residents to only put paper-pee-poo down the loo – as blockages are a major issue.
- encouraging residents not to concrete over front gardens or increase drainage to pipes (an extra conservatory, toilet etc) – which adds to the run-off problems. Isle of Wight is considering having a council/ water co' officer who can liaise with residents to reduce front garden removal and increased run-off.
- working with plumbers to ensure foul sewers don't connect to surface water pipes (as in Havant).

**Response ID:** RIV109      **Organisation:** Natural Enterprise Ltd

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Isle of Wight

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(1) Strongly agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(1) Strongly agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV110      **Organisation:** Isle of Wight Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Isle of Wight

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(3) Disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

I think the additional objectives listed for the Isle of Wight that have evolved from previous consultation more properly reflect the wider priorities of the catchment and the consumer/customers. It's surprising that in the existing 14 objectives there is nothing on lowering the carbon cost of the services provided as this may lead to more sustainable and locally derived solutions than those currently considered. Equally disappointing is the seemingly lack of joining up the issues of supply and drought with that of excess water through flooding, for example through a whole life-cycle approach. The current objectives are very industry focussed rather than either customer or more particularly environment focussed.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

How does PO5 Storm overflow performance relate to PO10 Surface water management?

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(5) No opinion

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(5) No opinion

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(5) No opinion

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

The council are currently undertaking a Section 19 investigation and reporting under the 2010 Flood & Water Management Act to understand those that were affected by the flooding the Isle of Wight experienced in July and August 2021 and the rolls played by both the environment/infrastructure and relevant Risk Management Authorities. We advise that you consider the outcomes of this report and any recommendations relevant to Southern Water. We expect publication early 2022.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV111      **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Isle of Wight

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Can't think of any more. If there are other rounds of DWMP presumably there will be a chance to revisit this, as we all become more familiar with the issues. Also if you are addressing 80pc of the issues that sounds a sizeable chunk of the problems.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(1) Strongly Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

No, although I am not clear how some of the 'significant risks' in 2020 are no longer risks in 2050.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(5) No opinion

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

Its important to include the wider opportunities and not just address waste water issues, ie need to align with other environmentally-influencing strategies and consider how we work with other environmental and economic concerns, ie summer water shortages, nature corridors.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

This will help us align with other maps ie Local Nature Recovery Plans (being considered), biodiversity opportunities, LEP plans etc.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Aligning with other environment strategies with councils and others. Considering resources of councils and other stakeholders and how they should contribute and time involved – especially if they are working unpaid. Consider how local communities and lower level groups can get involved, eg: • providing more space around developments and roads to capture/ slow run-off. Potentially have settlement areas so the most polluted particles can settle out. Need buy-in of local authorities, developers, Highways England (main roads) Hants CC for smaller roads. • using excess water in sectors and seasons when water is lacking – create winter storage areas to capture water for use by horticulture, agriculture, but also provide wetlands for nature. To do this we need to know where the main assets and areas that are at risk of spills, so EHCP can understand what other interests can get involved, eg create a wetland that links to another nature-rich area to make a wildlife corridor, proximity to farmland so water could be re-used without treatment. • encouraging reduced water consumption by residents and businesses, and use of water butts, creation of 'rain gardens'. • encouraging residents to only put paper-pee-poo down the loo – as blockages are a major issue. • encouraging residents not to concrete over front gardens or increase drainage to pipes (an extra conservatory, toilet etc) – which adds to the run-off problems. Isle of Wight is considering having a council/ water co' officer who can liaise with residents to reduce front garden removal and increased run-off. • working with plumbers to ensure foul sewers don't connect to surface water pipes (as in Havant).

**Response ID:** RIV112      **Organisation:** Isle of Wight Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Isle of Wight

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Confirmation that nutrient neutrality is a major issue on the Island - and would become even more so if Sandown WwTW reduced % of sewerage output from the island.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**



Ability of Sandown WwTW to cope with proposed levels of development and in conjunction, what improvements can be made to the existing sewerage infrastructure serving current development.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

We are aware that identifying hotspots within the existing network may only occur when the network is appraised for new development connections in the area. Given the frequency of flooding issues on the island, where combined systems cannot cope with high rainfall and surface run off, it would seem like a necessary exercise to map the IOW network for existing hotspots requiring investment, regardless of new development connections. This may then enable us as plan makers to seek to collect contributions to improvements if new development does not split surface and foul water.

**Response ID:** RIV113      **Organisation:** South East Water Ltd

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Medway

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(1) Strongly agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

The planning objectives appear comprehensive and cover a wide range, so believe these are sufficient to cover all areas of concern. It is more likely that an objective would be expanded if anything was found to be missing at a later date. The objectives appear to allow for future population expansion, climatic changes etc so nothing to add other than how do you allow for negative impacts on the river basin that may not be a result of Southern Waters activities and how do you represent this and may be do some engagement/awareness in this area. Things like fly tipping, boating activities, animal waste.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(1) Strongly agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Perhaps similar to response above, are there any perceived major risks from non-Southern Water activities that need to be highlighted for public awareness. Does flood risk also cover wastewater site locations/storm tanks?

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

The choices appeared correct, but sometimes the detail behind choices was not always evident. For example, electrical and maintenance it was not clear if it was age, maintenance of assets or power failures as this would direct the focus to replacement, maintenance improvements or electrical upgrades/power back up. There appeared to be work to on the nutrient neutrality which will need to address other impacts in the catchment area. Groundwater pollution, there did not appear to have been investigations around pollution by consultation with other abstractors and the EA. Modelling of hydraulics was not complete for all. Will this include data from technicians and network failures, plus future growth allowances?

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Network flooding and storm overflow, hopefully this will also then start to address other areas. These should also take into account future growth and climate changes. I'm guessing there will be an element of enforced focus due to public perception and legislation changes versus final level of funding granted.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Stakeholder engagement is going to be key for this and managing perception due to current public perception and lengthy timescales between identifying key deliverables and being able to deliver. Public education and non-budgetary action may help manage this in the meantime, such as changing public behaviour and bringing them on the journey.

**Response ID:** RIV114      **Organisation:** Medway Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Medway

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Understand impacts of climate change ( I note there is a technical document on this but should this also be a specific planning objective? Perhaps this is covered by carbon neutrality). I also feel 'Secure nutrient neutrality' needs to apply to Medway catchment due to the sensitivities and designations of the marshes & the known load at Motney. Achieve good ecological status. Reduce failure of pumping stations. Achieve carbon neutrality. Provide multifunctional benefits. Reduce potable water use/cross reference with WRMP

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Recommend that the risks of 100 year storm are looked (including +40% for climate change) to be consistent with planning climate change uplifts and also to provide a longer horizon scan. Although this may exceed funding thresholds, it provides a more rounded look at risk commensurate with planning whereby the 100 year storm is the typical threshold. This should also include a climate change factor. It is noted that it is standard to look at the 30 year risk but looking at the 100 year provides better risk profile in terms of planning which SW are involved with, and future resilience with respect to risk rather than just time and epochs.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(5) No opinion

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(1) Strongly agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

New development and infrastructure needed to support it. There is currently a lack of transparency with regards to how funding translates from connection fees to actual works on the ground. The DWMP I understand will be key to this but it \*appears\* there is a lack of now-time investment to support development sites coming forward, leading to an increase in risk. It is understood that SW have requested conditions of planning to manage this risk, but the fall out of this two-fold a) major developments are often not bought forward on a phased basis, and b) there is a risk whereby SW do not have immediate plans to upgrade a system that planning is held up which has a knock effect and clashes with required national development thresholds.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

The engagement for this process is second to none. More work is required however in terms of wider Risk Management Authority engagement. It is slow if it is at all present, not useful and at times, down right frustrating as a customer. Take a leaf from Thames - offer up funding for projects now to remove water from the surface water system via third party delivery whilst you're sorting out the DWMP. Stop saying yes to engagement for this, but then failing to respond to requests for proactive engagement elsewhere on real time reactive issues happening now. Most RMA's are ready to help with engagement but it has to be on our terms as well as yours.

**Response ID:** RIV115      **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Medway

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Not aware of any that have been completely missed out but, from the workshop, there was some further evidence on pollution incidents in the Hildenborough / Leigh / Tonbridge catchment that needed adding. I was unable to attend all of the workshops for this catchment so there may be others.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

I am happy to catch up with the catchments I missed the workshops for if you wish for further input.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Groundwater ingress adding to hydraulic overload. Egress of sewage to ground. Spills and incidents impacting ground as well as water courses. Surface water separation and drainage solutions ie SUDS. Ensuring and developing correct hydraulic capacity for existing works. Impact on groundwater quality.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV116      **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Medway

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**



**Response ID:** RIV117      **Organisation:** Tunbridge Wells Borough Council  
(Planning Policy)

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Medway

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(1) Strongly agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

None at present as some of the DWMP objectives generally align with the water related objectives and policies in the emerging TWBC Local Plan, which is good.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(1) Strongly agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Not that I'm aware of.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(1) Strongly agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

None.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

For the Tunbridge Wells area - Internal Sewer Flooding Risk, Pollution Risk, Sewer Collapse Risk, Sewer Flooding in a 1 in 50 Year Storm, Storm Overflow Performance, Flooding, due to Hydraulic Overload and Wastewater Treatment Works Dry Weather Flow Compliance.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV118      **Organisation:** Maidstone Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Medway

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Level of development growth pressure over the DWMP period

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(3) Disagree

**Additional comments:**

The Council is happy to see that Staplehurst wastewater system is to progress to the options development stage. However, it is concerned as to why has Marden and Aylesford wastewater systems are not been chosen to progress as it this stage. Significant growth is being planned in these locations which will have a major impact of the drainage and wastewater management system in this river basin catchment. It appears to not yet have been considered as part of projected growth.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Nutrient neutrality and network capacity.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV119      **Organisation:** South East Rivers Trust

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Medway

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Information provided showed that reducing the level of surface water loading on the works is required, but no further information was provided to identify specific options for solutions.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Mapping surface water areas draining into the foul water network and identifying opportunities for SuDS, or similar solutions, would have allowed this. We carried out a similar exercise in partnership with Thames21 for identifying opportunities to intercept and treat road run-off, with constructed wetlands, by mapping outfalls, their surface water catchment, the roads they contained and where the surface water network crossed public greenspace where constructed wetlands could be built online with the current network infrastructure

**Response ID:** RIV120      **Organisation:** New Forest National Park Authority

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

New Forest

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(3) Disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

For the New Forest with outstanding freshwater and marine habitats which are at risk of deterioration, there are opportunities for nationally and internationally important nature recovery and opportunities to address harm which should not be lost. Further consideration should be given to recognition of designated site condition. Southern Water must therefore have regard to the need to conserve and enhance the wildlife and natural beauty of the National Park in preparing the DWMP for catchments within it. Cumulative impact of nutrient sources. Nutrient neutrality is a major issue for a variety of stakeholders within the catchment. None of the wastewater treatment works within the National Park area (e.g. Beaulieu, Boldre, Brockenhurst, Lyndhurst, Sway) have Total Nitrogen (TN) limits currently on them.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(3) Disagree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Significant areas of the New Forest catchment are covered by national (e.g. SSSI) and international nature conservation designations (e.g. SPA, SAC and Ramsar). These designations highlight the importance of the New Forest's wetlands and water dependent habitats – a factor that must be central to Southern Water's priorities within this catchment.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(3) Disagree

**Additional comments:**

It is disappointing that the contribution of all wastewater sites (Beaulieu, Boldre, Brockenhurst, Lyndhurst, Sway) within the New Forest catchment is not recognised, given priority, and identified for action.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Addressing issues and making improvements at some of the smaller works across the New Forest Catchment could lead to reductions in nutrient levels and lead to favourable condition in a number of SSSI habitats, e.g. New Forest SSSI (water features including the Beaulieu River).

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

The New Forest catchment is potentially unique in the number and area of designated wildlife sites that are impacted by wastewater. Monitoring the range of sites for both WFD and designated site status is challenging. Underlying data on SSSI condition, which often drives other assessment conclusions, can be relatively outdated in the New Forest due to the challenge of monitoring such large and complex sites. A precautionary approach to decisions is therefore highly advisable.



**Response ID:** RIV121      **Organisation:** New Forest Catchment Partnership

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

New Forest

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Protect and restore freshwater and coastal habitats to the very highest standards. Include ponds, small lakes, headwaters and mires and aiming to improve to WFD High status. A further review of planning objectives as merited by new evidence, as well as emerging government policy is recommended.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(3) Disagree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

In order to build on awareness of issues and potential solutions, we consider there is a need for further ongoing liaison between Southern Water and local stakeholders. This would mean further iterations of the DWMP are supported by an improved and up to date understanding of issues, data collection and activity in catchments, as well as allowing for data collection to support the process. The Lymington and Beaulieu catchments are probably where the Partnership considers additional attention is most merited and from the Partnership's perspective the East Boldre and East End works would also be worthy of prioritisation to support objective PO9. It is disappointing however that the contribution of all wastewater sites within the New Forest catchment is not recognised, given priority, and identified for action. It is unclear why some WwTW are classified as moderately significant and others very significant for nutrient neutrality as they all discharge to the designated Solent sites. It is understood that it is the cumulative impact of nutrient sources that causes the environmental harm, therefore just addressing the most polluting is not enough to resolve the issues and respect environmental laws. Cumulative impacts need to be included.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(3) Disagree

**Additional comments:**

The DWMP has identified that sites such as Brockenhurst WWTW would benefit from analysis of sources of flows and improvements to water quality and quantity by users - the potentially significant additional seasonal campsite use is likely to be a factor in these issues.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

For catchments such as the New Forest - with outstanding freshwater and marine habitats which are at risk of deterioration, and where there are opportunities for nationally and internationally important nature recovery, opportunities to address harm being lost is a concern.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Whilst the DWMP has allowed for broad issues and strategic opportunities to be discussed at workshops, the timescales of the process do not allow for more useful further collaboration. We would support the regulator and companies in allowing resources to be allocated to an ongoing programme of catchment level liaison and support, and we understand Southern Water are investigating potential approaches which we would welcome. Collaboration action across catchment boundaries is also needed.

**Response ID:** RIV122      **Organisation:** Friends of the Westbrook and Stonebridge Pond

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

North Kent

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(3) Disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

The North Kent Catchment contains a number of small streams and ditches that lead from the North Downs aquifer to The Swale. These watercourses, including the Westbrook (the stream looked after by the Friends of the Westbrook and Stonebridge Pond) are vital elements of the network of blue and green infrastructure of the borough and serve as important wildlife as well as drainage corridors. The Westbrook is a chalk stream, a globally rare habitat, defined by the clean, spring-fed water which feeds it. Sadly, however, incidents (related to the capacity of the local combined surface water and sewage system) means that in storm conditions this stream is polluted as sewage overflows into it (as happened on 1st August 2021).

This situation will become more severe with growth and climate change. A recognition of the role of these small watercourses and issues they suffer should be included in the DWMP and a Planning Objective added about improving the quality of these receiving watercourses, in particular chalk streams. We welcome the addition of the additional planning objectives from the September 2020 Stakeholder Workshops. However, three objectives identified in the September 2020 workshops but not included here are 'increase surface water separation to reduce CSO discharges', 'reduce the cumulative impacts of discharges to sensitive waters' and 'reduce impacts of chemicals and plastics'. Why have these identified objectives not been included (maybe it is explained somewhere in the documentation, but it is not immediately obvious) and how are these useful objectives reflected in the DWMP? A hyperlink to the explanation of why suggested objectives have been rejected would be welcome and useful. Objectives 1-8 are not set out in this consultation as objectives (goals) merely issues. For instance 'pollution risk' is an issue, the objective should be 'prevent pollution risk' (for similar). As such these objectives are somewhat misleading. The titles of planning objectives are not consistent across the consultation. For instance, objective 14 is variously listed as 'protect shellfish water quality' and 'improve shellfish water quality'. I would always advocate for the more ambitious standard 'improve' but at any rate, the objectives should be consistent.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(3) Disagree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Hydraulic overload is certainly a risk in the Faversham area and as such I'm surprised that it is not recognised in the DWMP as a 'very significant' issue. Hydraulic overload relates very closely to other 'very significant' issues of internal sewage flooding, storm overflow performance and nutrient neutrality. The risks to small watercourses such as the Westbrook and other chalk streams is not identified in the DWMP and is an omission - particularly given the fact that chalk streams are globally rare habitats. The Westbrook drains into Faversham Creek. One unrecognised risk is the pollution risk to Faversham Creek from untreated effluent discharged at the WTW which is then washed upstream on an incoming tide. Furthermore, the DWMP does not recognise the value of recreation within the catchment eg dinghy sailing, swimming, canoeing on Faversham Creek. These are currently unsafe activities due to the incidents of untreated sewage in the Creek (on top of any pollution incidents upstream). This pollution is not sufficiently recognised in the DWMP (bathing water quality is not seen as an issue in the catchment). However, poor water quality is inhibiting the regeneration of Faversham Creek for use by the community. Southern Water need to work with the Environment Agency on reviewing the standards set and the monitoring of these standards to ensure that they are fit for purpose in the 21st century.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

The investment strategy for the North Kent Catchment does assist with an understanding of SW's strategic intentions. The fact that all of the wastewater systems across the North Kent Catchment have a proposed investment strategy to IMPROVE is welcomed, although it is a sad reflection of the poor quality and lack of sustained investment in the drainage and wastewater infrastructure across the area. We welcome the inclusion of Faversham in the options development and appraisal stage.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

The impacts of climate change and growth. - Separation of surface water systems from sewage as an approach to be considered and invested in alongside SUDS and customer education . - Recognition that SUDS is often outside the control of Southern Water. Who would control implementation and monitoring of SUDS and who would pay for it? - Improved monitoring and standards, including of bathing water quality (working with the EA)

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

The website is informative to an extent as it contained a lot of extremely useful information, but it is difficult to navigate and feel confident that everything has been read. A Contents page could help with this. To make consultation input easier, this Consultation page should contain hyperlinks to the relevant sections of the website. Also, a word version of the consultation response form should be provided so that respondents can prepare (and save) their answers ahead of submission. Missing from the website is mapping of incidents and monitoring locations. These would be extremely useful for the community to see and would be a useful reference point for those people who submit reports of incidents to SW and want to be confident these issues are being followed up.

**Response ID:** RIV123      **Organisation:** Swale Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

North Kent

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(3) Disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

The first 8 objectives of the 14 Planning Objectives (first 6 as defined by Water UK for all water companies and 7&8 by Southern Water) are not really set out as objectives (goals), rather a list of issues. For instance '1. Internal Sewer Flooding Risk' is not an objective – rather it should say (for instance), '1. Prevent Internal Sewer Flooding Risk' ? Objectives 9-14 are set out as goals eg 'Achieve Good Ecological Status/Potential'. The 'objectives' 1-8 as set out should be adapted to include real goals for improvement otherwise they are meaningless as objectives. The titles of the Planning Objectives are not consistent across all tables in the consultation. Eg objective 14. is sometimes 'protect shellfish water quality' and sometimes 'improve shellfish water quality'. These are different objectives and these should be checked and corrected where necessary. Obviously, 'improve' is a more ambitious objective than 'protect' and should be pursued wherever possible. We welcome the addition of the additional planning objectives from the September 2020 Stakeholder Workshops. However, three objectives identified in the September 2020 workshops but not included here are 'increase surface water separation to reduce CSO discharges', 'reduce the cumulative impacts of discharges to sensitive waters' and 'reduce impacts of chemicals and plastics'. Why have these identified objectives not been included (maybe it is explained somewhere in the documentation, but it is not immediately obvious) and how are these useful objectives reflected in the DWMP? A hyperlink to the explanation of why suggested objectives have been rejected would be welcome and useful. Swale Borough contains a number of small streams and ditches that lead from the North Downs (or the aquifer beneath) to The Swale. Watercourses such as these are vital elements of the network of blue and green infrastructure of the borough and serve as important wildlife as well as drainage corridors. Indeed, many of these watercourses are chalk streams, a globally rare habitat, Improving the quality of these receiving watercourses is currently not recognised in the Planning Objectives and should be rectified.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(3) Disagree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Swale Borough Council (Planning Policy team) consider that Hydraulic Overload is underestimated in the current DWMP and this will get worse with climate change and growth. Currently, this is only identified as a 'very significant' issue for Queenborough in 2020. However, the impacts of this are clear to see throughout the borough at present and, due to the nature of the combined sewage system, hydraulic overload contributes to internal sewage flooding, storm overflow performance, nutrient neutrality and other issues of concern. KCC raised this as an issue in a recent DWMP workshop and also spoke of the opportunities for surface water separation (from sewage). It seems that surface water separation is considered secondary to customer behaviour change and SUDS in this DWMP, but they are all important and should be considered alongside each other as each has a role to play. Swale Borough Council (Planning Policy team) disagree with the BRAVA assessment of bathing water quality which is either considered 'not applicable' (because a wastewater catchment is not linked to a bathing water) or 'not significant' within the BRAVA Risk Assessment. Bathing in this catchment is seriously compromised by water quality, due to the release of untreated effluent into Swale's freshwater watercourses and creeks. For instance, as part of the regeneration of Faversham Creek, local people would like to be able to swim, sail and canoe in the Creek. This is not currently safe to do, due to the escape of untreated sewage into the Creek, which due to incoming tides, can be washed far upstream. This is an issue regarding what monitoring and standards are used (the current monitoring regime and standards are not appropriate) and to be pursued with the cooperation of the Environment Agency, but the 'not applicable' and 'not significant' descriptions of Bathing Water quality are currently misleading. Bathing Water quality is a concern within Swale (many of our beaches were closed over the summer as a result of discharges in other catchments) and it should be recognised as a risk in the North Kent Catchment DWMP.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(3) Disagree

**Additional comments:**

Whilst we understand that difficult decisions need to be taken, it is a concern that wastewater systems at Eastchurch and Teynham may be left behind in the options development. Eastchurch is currently identified as having a 'very significant risk in 2020' of storm overflow discharges and Teynham is currently identified as an 'Area of Opportunity' in the Swale Local Plan Review with a potential for over 1,000 new homes. As such, there is an argument for progressing these wastewater systems in the options development and appraisal. See comments above about hydraulic

overload and bathing water quality. More details of incidents which have occurred is required in this public consultation to enable the community to feel that they are being properly consulted and engaged. Maps should be provided within the DWMP showing the frequency and locations of incidents. There is currently much public distrust of Southern Water who need to be as open and transparent as possible going forward and as such sharing incident mapping and monitoring would be a positive step.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Community consultation - in particular with those customers/bodies who have reported incidents. - The importance of separating surface water systems from sewage - alongside maintaining/upgrading current infrastructure, SUDS and customer education. - Improved monitoring and standards, including of more widespread and thorough assessment of bathing water quality (working with the EA) and other standards. - There is a risk in not including the Eastchurch and Teynham systems at this stage and they are areas of concern and Teynham is potentially also an area of growth.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Please see the SBC motion regarding Southern Water dated 6th October 2021.  
<https://services.swale.gov.uk/meetings/mgAi.aspx?ID=13140>



**Response ID:** RIV124      **Organisation:** South East Water Ltd

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

North Kent

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(1) Strongly agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

The planning objectives appear comprehensive and cover a wide range, so believe these are sufficient to cover all areas of concern. It is more likely that an objective would be expanded if anything was found to be missing at a later date. The objectives appear to allow for future population expansion, climatic changes etc so nothing to add other than how do you allow for negative impacts on the river basin that may not be a result of Southern Waters activities and how do you represent this and may be do some engagement/awareness in this area. Things like fly tipping, boating activities, animal waste.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(1) Strongly agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Perhaps similar to response above, are there any perceived major risks from non-Southern Water activities that need to be highlighted for public awareness. Does flood risk also cover wastewater site locations/storm tanks?

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

The choices appeared correct, but sometimes the detail behind choices was not always evident. For example, electrical and maintenance it was not clear if it was age, maintenance of assets or power failures as this would direct the focus to replacement, maintenance improvements or electrical upgrades/power back up. There appeared to be work to be done on the nutrient neutrality which will need to address other impacts in the catchment area. Groundwater pollution, there did not appear to have been investigations around pollution by consultation with other abstractors and the EA. Modelling of hydraulics was not complete for all. Will this include data from technicians and network failures, plus future growth allowances?

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Network flooding and storm overflow, hopefully this will also then start to address other areas. These should also take into account future growth and climate changes. I'm guessing there will be an element of enforced focus due to public perception and legislation changes versus final level of funding granted.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Stakeholder engagement is going to be key for this and managing perception due to current public perception and lengthy timescales between identifying key deliverables and being able to deliver. Public education and non-budgetary action may help manage this in the meantime, such as changing public behaviour and bringing them on the journey.

**Response ID:** RIV125      **Organisation:** Maidstone Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

North Kent

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV126      **Organisation:** Rother District Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Rother

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Additional Planning Objectives could include: reducing the number of misconnections to properties; reducing the risks resulting from poor infrastructure conditions and protection of environmentally sensitive areas.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Officers at Rother District Council spoke directly with Southern Water at the Fairlight catchment workshop meeting, where the specific issues about this catchment were discussed. The drainage issues in this area are significant for the Council, due to the issues with land stability related to Fairlight Cliffs. It was discussed that a long-term project would need to be delivered to ensure necessary action was taken to minimise surface water draining over the top of the cliffs, and to deal with specific drainage issues within the catchment area. The Council along with the Parish Council would welcome confirmation that Southern Water considers this area a high priority and that a specific project will be moved forward by Southern Water in due course.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(1) Strongly agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(1) Strongly agree

**Additional comments:**

The wastewater catchments that serve the greatest population seem to have been chosen which means any investments will be helping the greatest number of people. On the assumption that the more populated areas are likely to get bigger faster than the smaller villages, it also hopefully means that there will be sufficient infrastructure present to support future growth.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Building new and improving existing infrastructure to meet the demands of new residential developments should be a major focus going into the future as improving the capacity of the wastewater network should help to reduce the likelihood of adverse pollution and/or discharge. This hopefully should make meeting environmental objectives, such as achieving good ecological status, easier as the wastewater will not be discharged in environmentally sensitive locations. As previously commented, officers at Rother District Council spoke directly with Southern Water at the Fairlight catchment workshop meeting, where the specific issues about this catchment were discussed. The drainage issues in this area are significant for the Council, due to the issues with land stability related to Fairlight Cliffs. It was discussed that a long-term project would need to be delivered to ensure necessary action was taken to minimise surface water draining over the top of the cliffs, and to deal with specific drainage issues within the catchment area. The Council along with the Parish Council would welcome confirmation that Southern Water considers this area a high priority and that a specific project will be moved forward by Southern Water in due course.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

The Source-Pathway-Receptor model helps to provide a consistent format for options across the whole of Southern Water and also highlights what could be done further down the line. However, at this stage the generic options do not yet provide the level of detail some may want (even at this early stage) for how their specific wastewater system will be improved; the generic options only provide so much detail as to the direction of investment.

**Response ID:** RIV127      **Organisation:** Environment Agency

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Stour

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

No particular additional planning objectives that raised in the meetings. Would suggest that new treatment works locations might be a sensible option to take forward. Further work to be carried out on understanding of groundwater assessment outcomes from BRAVA assessments and the information can support future plans is suggested.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(1) Strongly agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Yes - we covered this in the workshop, but for some reason the connection between the number of incidents in the Stour Valley (between Wye and Canterbury) and the rising trend of pollution in the groundwater along with the groundwater vulnerability had not been picked up well. As we flicked through the GIS layers in the meeting the issue was apparent but it had not flagged as a major risk. We can provide the additional data.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

As mentioned before, and in the workshop, the connection between the number of incidents in the Stour Valley (between Wye and Canterbury) and the rising trend of pollution in the groundwater along with the groundwater vulnerability had not been picked up well. As we flicked through the GIS layers in the meeting the issue was apparent but it had not flagged as a major risk. There may be other issues that we have not managed to fully address at the workshops so it will be good to have an overview at some point.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Impact on groundwater quality particularly relevant in this catchment. Groundwater ingress / egress of sewage to ground. Pollution incidents from spills and pipe bursts, particularly in vulnerable areas. Nutrient neutrality. Surface water separation. Ensuring and developing correct hydraulic capacity for existing works.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV128      **Organisation:** Canterbury City Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Stour

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

There are a series of smaller waste water treatment works on stour catchment which have high or no consent levels for nutrients and there has been lots of cumulative development. This combined with low amount of monitoring means there are risks to the catchment which may be missed or misunderstood.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(3) Disagree

**Additional comments:**

Broadly agree but have marked as disagree as we are concerned that Newnham Valley Preston, which has very significant issues with nutrient neutrality and is included within the scope of the Stodmarsh advice, has not been taken forward into options development and appraisal.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree



**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

The Stour catchment is under immense pressure for development. Measures to secure nutrient neutrality are urgently needed to support growth in the area. We would like to see the investment programme setting out a clear evidence-based approach which tackles the causes. Improved and increased data collection and monitoring is also required.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Marked disagree to the question regarding the investment strategy as we have not seen the strategies and it looks like they will be developed next year. Overall, we are concerned with the amount of waste water systems that are in the 'Improve' category. As part of the investment strategies, we would like to see more granularity about what will be happening in the short term (next few years).

**Response ID:** RIV129      **Organisation:** Maidstone Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Stour

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Level of development growth pressure over the DWMP period

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(3) Disagree

**Additional comments:**

The Council disagrees that Lenham wastewater system has not been chosen to progress as it this stage. Significant growth is being planned in this location which will have a major impact of the drainage and wastewater management system in this river basin catchment. It appears to not yet have been considered as part of projected growth.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Nutrient neutrality and network capacity.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV130      **Organisation:** Southampton City Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Test and Itchen

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Planning objective 10 (surface water) - there isn't sufficient consideration to separate surface water systems, with all pie chart diagrams showing percentage of surface water entering a foul or combined system. Large areas of Southampton City are on separate systems (presumed due to large scale post-war regeneration creating opportunity to better drainage). Presenting surface water with foul seems to down-play the risk of sewer capacity issues or issues of these systems. Would be better if there was more clarity over this objective, or completely separate foul and surface water issues under two objectives.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(5) No opinion

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Yes - significant issues of surface water flooding to Millbrook Road West (Millbrook catchment) and Portsmouth Road (Woolston Catchment) - these are more and more frequent and from a surface water only system (Millbrook Road West also has a foul water issue). Limited clarification on how tidal ingress into surface water systems has been looked at or addressed - with climate change, more and more sewer outfalls will be under sea level and not able to discharge effectively. This issue should not be ignored as will increase inland surface water flooding.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(5) No opinion

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(5) No opinion

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

It is vital that Portswood WWTC is examined as frequent spills into the Itchen Estuary have been reported by citizens in Southampton, risking water quality. Millbrook WWTC requires examination as future regeneration within this catchment may have an impact.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Surface water flooding (including surface water only systems and tidal ingress) - more partnership funding made available to allow LLFAs to bring forward sustainable drainage schemes that will ultimately reduce the water entering Southern Water systems, and provide benefit to customers not only by reducing flood risk, but improving biodiversity, water quality and amenity.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV131      **Organisation:** Wessex Rivers Trust

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Test and Itchen

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(5) No opinion

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

We very much appreciate the opportunity to engage and provide input towards the DWMP for the T&I catchment. The various workshops and webinars to date have been informative and helped stakeholders better understand the risks and issues affecting the health of the water environment. Future sessions would however benefit from the attendance of a member/s of SWS's Environment team. This would help break down the barriers and understanding between engineers and ecologists, and ensure the most holistic, 'green' plans are developed.

**Response ID:** RIV132      **Organisation:** Eastleigh Borough Council

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Test and Itchen

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

I'm not sure on the scope of these documents – at a strategic level, a holistic view should be being looked at beyond SW infrastructure. Practically I appreciate the difficulties.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(1) Strongly Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Similar comments to above

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(5) No opinion

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(1) Strongly agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**



Reducing/ removing storm overflows which contaminate our surface waters;  
Improving quality of WWTW discharges (nature-based solutions - and ensuring enough space surrounding the WWTWs is safeguarded); Improving the WQ of surface water discharges.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

## **Part 2: Customer responses**

### **A: Strategic Environmental Assessment Consultation**

**Response ID:** SEA200    **Organisation:** Private citizen

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Are there any additional plans or programmes at the international, national, regional or local level which have been excluded from the plans and programmes review, which your organisation thinks are relevant to the DWMP SEA?**

Stop dumping raw sewage into our rivers and waterways. Maybe plough some of the tens of millions you've harvested out to private investors and shareholders into making the relevant changes you need to make to achieve this, rather than weighing up the cost/benefit ratio of how much you'll get fined if you persist.

**Q2: Do you have any comments on the baseline information presented or any additional baseline information you think would be useful?**

Stop dumping raw sewage into our rivers and waterways. Maybe plough some of the tens of millions you've harvested out to private investors and shareholders into making the relevant changes you need to make to achieve this, rather than weighing up the cost/benefit ratio of how much you'll get fined if you persist.

**Q3: Do you have any comments on the key issues and opportunities identified?**

Stop dumping raw sewage into our rivers and waterways. Maybe plough some of the tens of millions you've harvested out to private investors and shareholders into making the relevant changes you need to make to achieve this, rather than weighing up the cost/benefit ratio of how much you'll get fined if you persist.

**Q4: Do you have any comments on the proposed SEA objectives and assessment questions/sub-themes?**

Stop dumping raw sewage into our rivers and waterways. Maybe plough some of the tens of millions you've harvested out to private investors and shareholders into making the relevant changes you need to make to achieve this, rather than weighing up the cost/benefit ratio of how much you'll get fined if you persist.

**Q5: Do you have any comments on SEA objectives scoring criteria?**

Stop dumping raw sewage into our rivers and waterways. Maybe plough some of the tens of millions you've harvested out to private investors and shareholders into making the relevant changes you need to make to achieve this, rather than weighing up the cost/benefit ratio of how much you'll get fined if you persist.

**Do you have any other comments on the scoping report?**

Stop dumping raw sewage into our rivers and waterways. Maybe plough some of the tens of millions you've harvested out to private investors and shareholders into making the relevant changes you need to make to achieve this, rather than weighing up the cost/benefit ratio of how much you'll get fined if you persist.

**Response ID:** SEA202      **Organisation:** Private citizen

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Are there any additional plans or programmes at the international, national, regional or local level which have been excluded from the plans and programmes review, which your organisation thinks are relevant to the DWMP SEA?**

**Q2: Do you have any comments on the baseline information presented or any additional baseline information you think would be useful?**

You need to redirect monies from shareholders to replace, renew and upgrade the waste water systems as they are no longer fit for purpose. Shareholders should take a break until the systems are improved.

**Q3: Do you have any comments on the key issues and opportunities identified?**

You need to stop putting untreated and poorly treated sewage into the water courses. This is not the service I pay for.

**Q4: Do you have any comments on the proposed SEA objectives and assessment questions/sub-themes?**

**Q5: Do you have any comments on SEA objectives scoring criteria?**

**Do you have any other comments on the scoping report?**

**Response ID:** SEA203    **Organisation:** n/a

**Are you happy to be contacted about your feedback?**

No

**Q1: Are there any additional plans or programmes at the international, national, regional or local level which have been excluded from the plans and programmes review, which your organisation thinks are relevant to the DWMP SEA?**

You are killing our seas - shameful and need to be properly held to account.

**Q2: Do you have any comments on the baseline information presented or any additional baseline information you think would be useful?**

You are killing our seas - shameful and need to be properly held to account.

**Q3: Do you have any comments on the key issues and opportunities identified?**

You are killing our seas - shameful and need to be properly held to account.

**Q4: Do you have any comments on the proposed SEA objectives and assessment questions/sub-themes?**

You are killing our seas - shameful and need to be properly held to account.

**Q5: Do you have any comments on SEA objectives scoring criteria?**

You are killing our seas - shameful and need to be properly held to account.

**Do you have any other comments on the scoping report?**

You are killing our seas - shameful and need to be properly held to account.

**Response ID:** SEA204    **Organisation:** Resident/Customer

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Are there any additional plans or programmes at the international, national, regional or local level which have been excluded from the plans and programmes review, which your organisation thinks are relevant to the DWMP SEA?**

It does not appear that the New Forest National Park Authority features much in this document!

**Q2: Do you have any comments on the baseline information presented or any additional baseline information you think would be useful?**

**Q3: Do you have any comments on the key issues and opportunities identified?**

**Q4: Do you have any comments on the proposed SEA objectives and assessment questions/sub-themes?**

**Q5: Do you have any comments on SEA objectives scoring criteria?**

**Do you have any other comments on the scoping report?**

It does not appear that the New Forest National Park Authority features much in this document! Have they been consulted from the start of this process

## **B: Drainage and Wastewater Management Plan Consultation**

**Response ID:** DWMP200 **Organisation:** Get Consultants

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(4) Strongly disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

There is no published plan to increase sewage capacity for the following WwTWs that serve Chichester District. Many have a Position Statement and all have a Statement of Common ground that limits sewage connection from future developments, and most have less than 20% sewage treatment capacity remaining, classed in your BRAVA DWMP analysis as 2 (very significant risk). Columns are (A) WwTW (B) houses capacity left (C) % WwTW capacity left (D) Position Statement or Statement of Common Ground limiting further sewage connection: Bosham 546 22% SOCG; Apuldram 6,753 25% SOCG + PS (site flooding / infiltration); Tangmere 3,714 62% SOCG; Thornham 954 7% SOCG + PS (capacity now only 367 houses at 30/8/2021); Sidlesham 1,188 10% SOCG; Pagham 734 16% SOCG; Lavant 291 9% SOCG + PS (infiltration); Kirdford 140 42% SOCG; Loxwood 14 1% SOCG + PS; Wisborough Green 227 35% SOCG; Total CDC area 14,562 21%. Immediate action is required in AMP8 to improve capacity at Thornham, Lavant and Loxwood. Analysis does not cover storm water releases, a major concern to all Chichester Parishes, Councillors and residents

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(4) Strongly disagree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

The BRAVA analysis is not accurate. Whilst SW analysis shows limitations in capacity at treatment plants like Thornham, there appears no plan to do this before sewage capacity runs out, likely early 2022 given CDC has confirmed only 267 houses capacity remaining to cover an area currently serving 22,000 homes. This will also mean no scope for new housing in the CDC 15 year Local Plan until 2027 earliest (AMP8 funding round plus two years for construction) and the abandoning of Southbourne, Westbourne and Emsworth Neighbourhood Plans. This situation is therefore not accurately reflected in the grid analysis of Thornham options screening <https://www.southernwater.co.uk/media/5014/generic-options-screening-thornham.pdf>

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**



**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(4) Strongly disagree

**Additional comments:**

CDC area alone has 20% sewage capacity remaining, so it cannot be unique. SW needs to have a far more extensive plan of WWtW upgrades if it is to have any chance of meeting Government NPPF calculated new housing targets of 300,000 houses per year. There is no indication of work to pumping stations of which there are five times as many as the 330 WwTW that SW manages. CDC area alone has regular failure of these works that are old and in desperate need of maintenance, upgrade and replacement. Taylors Lane Bosham and Chidham regularly fail and cause storm water releases into the Nitrate vulnerable zone of Chichester Harbour

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(4) Strongly disagree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Just look at sewage treatment capacity. If there's less than 20% capacity left then there is unlikely to be enough to meet Government new housing targets. The BRAVA matrices on risks to each treatment works are not accurate. e.g. Arun and Western streams / Thornham WwTW. With 950 houses capacity left at the end of 2020 and 367 houses capacity left at the end of August 2021 (Chichester Council calculation) = 1% left then how can the BRAVA assessment at 2020 of risk to compliance be '0' It is obviously '2' Likewise with Loxwood, Pagham, Sidlesham and Tangmere. DWF compliance at 2020, 'Bathing waters' and 'shellfish' are also '2' for Thornham, Bosham and Tangmere. With the water table all along the coast at less than 10cm below the surface then the rating must be '2' for 'surface water management' for Thornham, Bosham and Apuldram

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(4) Strongly disagree

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

Reality. The information is well laid out but bears no relation to the real situation and lack of capacity with all Chichester area sewage works. Information needs to be added about all of the pumping stations too. Digital maps should be published of all pumping stations and sewage outflows. Do analysis of infiltration by area and publish the results. Gov.uk says assume 50% infiltration so how can you use 10% assumption when SW responds to planning applications? Use a conservative water

usage per household for planning (150 cubic metres per person) and use 40% infiltration minimum.

**Q12: How can we engage you more effectively as we develop the DWMP?**

Have a Chichester Councillor, Parish and residents forum. It's no good having MPs, Council Officers and the EA only, as they do not have any vested interest in solving the issues that local communities have about lack of sewage treatment capacity, up to 200 days a year of storm water releases into the Nitrate vulnerable zone of Chichester Harbour. Also publish the results annually of each WwtW and its DWF capacity (using 500 litres per household not the incorrect SW 330), its EA permit limit, remaining and publish regular results of N and P discharges

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(4) Strongly disagree

**Any other comments or feedback that you would like to give us?**

Get back in the real world with both the matrices analysis and with planning and investment. Councils need future-proof sewage capacity to meet Government housing targets and that means lots of investment in new treatment works, new pipelines (Chichester has one of the oldest sewage systems in the UK - 1892), proper survey of what the infiltration percentage is on the Chichester coast, upgrades to pumping stations and new pumping stations. Also make sure that any works do not mean constantly digging up local roads and delays to residents and commuters.

**Response ID:** DWMP201 **Organisation:** Householder

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(5) No opinion

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Designing and running a fully integrated water system. Which would put the whole system as a complete chain made of equally functioning units. Working as a complete chain from source to consumer to eventual resolution of resource.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(3) Disagree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

All levels of risk assessments need to be reset. As more houses are built and occupied that are served by increasingly aged pipework, as more "rare" heavy rainstorms occur frequently as the climate changes, and as sea levels change the pressures and the weaknesses revealed by these changes will become horribly evident.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(5) No opinion

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(3) Disagree

**Additional comments:**

Wherever there is a need for work to be done in any part of the crucial, monopolised water supply, that work should be done.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(5) No opinion

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(5) No opinion

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(5) No opinion

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP202 **Organisation:** Faversham Town Council

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(3) Disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

Ensure that the network is capable of coping with increased waste water from future development, and the additional challenges of climate change and its impacts upon weather patterns.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(5) No opinion

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

Investment program puts too much emphasis on Wastewater transfer, particularly by road. Consideration should be given to connecting existing conurbations and housing currently not connected to mains sewage to the system and increasing storage and treatment capacity, particularly at the Faversham WTW in order to reduce movements by road transport and to build additional resilience to the system. The proposed strategy for north Kent should also include plans to improve the quality of bathing water, and tidal waterways in general in order to protect and enhance the ability of these important resources to be utilised leisure and to enhance the local economy. Investment should also be made to prevent discharges/the risk of discharges in order to protect the environment. Where possible existing combined stormwater/wastewater systems should be separated to further reduce the risk of an accidental discharge during increasingly intense periods of rain within the area, while also ensuring that any system is able to adequately cope with increased population /development and prevent the now frequent surface water flooding across the area.

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

**Additional comments:**

1. The main issue for Faversham is water quality in Faversham Creek as a result of discharges from the Faversham Wastewater Treatment Works (WTW). Even under

normal operating conditions, treated effluent from the WTW affects water quality along the entire length of the Creek because it is swept upstream on incoming tides, leaves residues as far up as the Tidal Basin, and is not flushed out immediately into the Swale and beyond. Although the discharges are treated to a relatively low standard, they comply with Environment Agency (EA) discharge consent and so, as far as the EA, OFWAT and Southern Water are concerned, there's no problem. 2. Water quality is poor enough, however, that the recreational use of Faversham Creek for swimming, dinghy sailing, rafting, etc., is impossible and will remain so until either regulations are tightened to require effluent from the WTW to be purified to a higher quality (which is determined by the EA, not SW) and/or the Faversham WTW is upgraded so that effluent can be pumped directly into the Swale instead of the Creek. 3. Under heavy rainfall conditions, storm tanks at the Faversham WTW are designed to store the increased influx of rainwater and wastewater until it can be treated when normal conditions return. Once the storm tanks are full, however, the resulting overflow – including untreated sewage – is discharged directly into the surrounding environment. 4. Regarding recreational use, there is very little mention in the SW consultation documents of either public interest or local communities. Instead, SW is driven by the regulatory texts governing the activities of water companies nationally. It appears to consider its clients to be the regulatory agencies rather than the private, residential customers who provide most of its income. 5. Our understanding from previous interactions with SW is that Faversham WTW is approaching the limits of its processing capacity. Partly as a result, SW recently announced a £2m upgrade of the Faversham WTW infrastructure to reduce the risk of raw sewage discharges and increase processing capacity. While the new investment is welcome, it will not be sufficient to resolve the problems presented above. 6. It is not clear either whether the planned upgrade will be sufficient to cope with the increased volume of wastewater that will result from the current expansion of residential housing in and around Faversham. Rather than increasing the capacity of a facility that is inherently flawed, the Faversham Society urges SW and regulators to think in terms of a more comprehensive upgrade that would see effluent from the WTW discharged via a new pipeline straight into the Swale to a standard that would meet all the relevant European Directives, which still apply. 7. While there are multiple mentions in the SEA of chalk streams as a priority habitat for protection, there is no mention in the DWMP documentation of Faversham chalk streams, notably Thorn Creek and Cooksditch, which both received discharges of raw sewage as a result of the heavy rainfall in August. We were unable to locate, on the SW website, the maps that are supposed to be part of the DWMP consultation. We suspect that the storm tanks at Faversham WTW discharge directly into Thorn Creek and know that, under storm conditions, a SW pumping station near Gordon Square discharges raw sewage into Cooksditch. As a top priority, both structures must be upgraded to avoid such discharges in future. 8. There is also very little mention in the SW consultation documents of the impacts of Faversham WTW on shellfish, despite the fact that both Central Swale and East Swale are designated as Shellfish Waters under DEFRA's Water Framework Directive (WFD). Untreated sewage discharges from Faversham WTW cause inevitable concerns both about the consumption of shellfish caught or farmed in nearby waters and about the safety of swimming at Seasalter beach, favoured by many Faversham residents, let alone in Faversham Creek itself.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(3) Disagree

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(3) Disagree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(3) Disagree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP203 **Organisation:** Local resident

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

From my experience, the sewers in Faversham cannot reliably cope with the volume of waste water, particularly in periods of heavy rain. The town is expanding rapidly with thousands of new houses being built around the town in a short space of time. The Victorian sewers cannot cope and waste water escapes to local streams and puts properties at risk. The infrastructure needs upgrading before more houses are built and not afterwards.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(4) Strongly disagree

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(4) Strongly disagree



**Q11: What improvements to the website would you like to see?**

The information needs simplification for local residents

**Q12: How can we engage you more effectively as we develop the DWMP?**

By responding to complaints and reports of incidents

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP204 **Organisation:** Green Party

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(4) Strongly disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

The need to remove progressively the reliance on combined sewage overflows.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(4) Strongly disagree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

The data provided on spills is grossly underestimated and there is no measure of volume of spills. They need to be reported in real time and flow meters need to be fitted to CSOs. I refer you to the WASP report. [https://www.windrushwasp.org/single-post/a-house-built-on-sand?utm\\_campaign=388b57d2-85ba-4677-97bd-21b2da4a9476&utm\\_source=so&utm\\_medium=mail\\_lp&cid=7001d7d3-ff37-4815-b9f0-acf3770a1508](https://www.windrushwasp.org/single-post/a-house-built-on-sand?utm_campaign=388b57d2-85ba-4677-97bd-21b2da4a9476&utm_source=so&utm_medium=mail_lp&cid=7001d7d3-ff37-4815-b9f0-acf3770a1508)

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(4) Strongly disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(4) Strongly disagree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Your reliance on CSOs and your failure to report accurately or manage the very high, concealed number of spills. In this context I have no confidence in your ability or

willingness to address the demands of the unprecedented building development in the area.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(4) Strongly disagree

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(4) Strongly disagree

**Q11: What improvements to the website would you like to see?**

The use of plain English and accurate live data.

**Q12: How can we engage you more effectively as we develop the DWMP?**

By being transparent about the challenges you face and your failure to address them to date.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(4) Strongly disagree

**Any other comments or feedback that you would like to give us?**

You need to reset the balance from being an organisation that is driven by profit to one that serves its customers. The failure to maintain the assets you acquired is so stark that unless there is radical change I can see little alternative but renationalisation of the industry.

**Response ID:** DWMP205 **Organisation:** n/a

**Are you happy to be contacted about your feedback?** No

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(4) Strongly disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

You are killing our seas - shameful and need to be properly held to account.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(5) No opinion

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

You are killing our seas - shameful and need to be properly held to account.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(5) No opinion

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

You are killing our seas - shameful and need to be properly held to account.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(5) No opinion

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

You are killing our seas - shameful and need to be properly held to account.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(4) Strongly disagree

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(4) Strongly disagree

**Q11: What improvements to the website would you like to see?**

You are killing our seas - shameful and need to be properly held to account.

**Q12: How can we engage you more effectively as we develop the DWMP?**

You are killing our seas - shameful and need to be properly held to account.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(4) Strongly disagree

**Any other comments or feedback that you would like to give us?**

You are killing our seas - shameful and need to be properly held to account.

**Response ID:** DWMP206 **Organisation:** Member of the public

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(4) Strongly disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

I feel Southern Water needs to be much more transparent about the failures of management of stormwater outfall issues and the impossibility for SW to treat the waste from the new home numbers planned at the centre by Government and imposed on local councils. Your assets need substantial investment and upgrading. Please be honest

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(3) Disagree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

More candour about the enormous risk load imposed by the rapidly changing weather patterns which are clear for all to see

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(4) Strongly disagree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(3) Disagree

**Additional comments:**

SW is under the cosh. Macquarie as your new owners have a poor water company track record. Despite all the publicity SW continues to pollute Chichester and Langstone Harbours on a regular basis and not always after heavy rain. I want SW to come clean and admit as your CEO has done 'in camera' that you do not have the ability to serve your new customers to an acceptable level. Employing tankers to collect sewage from new housing developments might be acceptable in the 3rd world - it is not acceptable in West Sussex in the 21st Century. Come clean and tell the truth and stop avaricious, uncaring and profit-motivated opportunistic developers from continuing to persuade farmers and landowners to sell their good quality

agricultural land in West Sussex. I do not think there is harm in saying No! when it is very clear that your staff and assets are not up to the demand challenge.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(3) Disagree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Your focus has to be urgent in terms of ensuring that your WWT plants can meet increasing demand as quickly as possible. The 5 year cycle of planning is very restricting. The Government is saying the investment required to bring our water companies up to the required level is circa £150bn. Your planned investment strategy is grossly inadequate.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

I am really not web savvy. I leave that to much younger brains

**Q12: How can we engage you more effectively as we develop the DWMP?**

SW must come clean and tell the truth, the whole truth and nothing but the truth. If you do so, this part of S England will be saved from disaster. Speak up and tell HMG to allocate new build homes elsewhere before we sink beneath a sea of steel, bricks and concrete and have our inadequate transport system exposed for what it is - INADEQUATE

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(3) Disagree

**Any other comments or feedback that you would like to give us?**

I THINK YOU WILL UNDERSTAND WHERE I STAND ALREADY

**Response ID:** DWMP207 **Organisation:** Resident/Customer

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(5) No opinion

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(5) No opinion

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(5) No opinion

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(5) No opinion

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

As a long term resident of the New Forest living in a location that is regularly flooded with surface water I find it perverse and unnecessary that this surface water flooding is always preceded, well in advance, by the domestic property sewers having been being inundated with surface water upstream in the forest area warning of the impending surface water flooding. Being located at the upstream end of the Slowhill Copse, Marchwood catchment area this inundation of the sewerage system then only compounds the problems in the downstream locations at the sewerage system falls to the treatment works. Some of the "hydraulic overloading" of the sewerage system is due to the infiltration that occurs at the upstream five pumping stations. Some of



which also experience hydraulic overloading in times of heavy, but not exceptional, rainfall.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(5) No opinion

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(3) Disagree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

Communicate more!

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(4) Strongly disagree

**Any other comments or feedback that you would like to give us?**

**Response ID:** DWMP208 **Organisation:** Faversham Society

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(3) Disagree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

These documents are confusing. In this case, it's not immediately clear that the 14 planning objectives referred to on the BRAVA webpage (<https://www.southernwater.co.uk/dwmp/baseline-risk-and-vulnerability-assessment>) are the 6+2+6 listed on the Planning Objectives one (<https://www.southernwater.co.uk/dwmp/planning-objectives>). The six additional planning objectives identified for North Kent are good, but they should make specific reference to chalk streams. The objective to achieve "good ecological status" sounds admirable, but clearly depends on how "good" is defined. Certainly here locally in Faversham, "good" should not allow for discharges of untreated sewage into chalk streams or normalise the unacceptably low quality of water in Faversham Creek.

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

The methodologies are not the problem. The problem is with the water quality standards that the company is held responsible for achieving. The Faversham Society would like to see Southern Water taking a proactive role in achieving better ecological status for Faversham Creek and nearby chalk streams by upgrading the entire Faversham WTW so as to avoid discharges into those watercourses altogether.

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(5) No opinion

**Additional comments:**

Given the number of geographical catchment systems appraised, it might be helpful to have some indication of relative priorities for investment. For example, Faversham WWTW catchment has 12 1st and 2nd tier metrics flagged, as high as any other catchment in Kent, yet investment might not be driven by that number.

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(5) No opinion

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Our concern is Faversham WWTW and Faversham Creek. It is grossly polluted and the effluent flows back into the town basin on every incoming tide. The works meets its consent but that is because it is an old consent inappropriate for today. Southern Water should consider gross pollution, community welfare and recreation as drivers for investment, regardless of consent standards. Regarding the pollution of local chalk streams with untreated sewage, urgent action should be taken to stop those discharges altogether or, where that is not possible in the short term, ensure that any effluent flowing from SW infrastructure into chalk streams is fully treated and will not cause damage to these sensitive and rare ecosystems.

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(4) Strongly disagree

**Q11: What improvements to the website would you like to see?**

Much greater clarity, e.g. on planning objectives per comments above, and with all documents available where mentioned. For example, I've been unable to find the maps that constitute SEA Annex D. Because of its complexity, this feels like a consultation targeted at water industry professionals, not the general public.

**Q12: How can we engage you more effectively as we develop the DWMP?**

Look for more partners in further developing the DWMP for North Kent, including Faversham Town Council and the Faversham Society. According to your own figures, the number of external partners engaged in the process so far was the lowest in the entire area.

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

Today's BBC headline is that "Last week, MPs voted by 268 to 204 to disagree with an amendment to the Environment Bill tabled in the Lords which sought to place a

new duty on water companies to reduce raw sewage discharges into rivers and demonstrate reductions in the harm caused by the discharges.” That vote has led to a public outcry, suggesting that there is widespread agreement with our contention that existing consent standards set by the Environment Agency on behalf of government are too lax. Southern Water should take opportunities where they exist to up its game and exceed those excessively low standards, especially in regard to such vulnerable watercourses as chalk streams and Faversham Creek, where recreational uses are rendered impossible by partially treated effluent from SW structures.

**Response ID:** DWMP209 **Organisation:** Local resident

**Are you happy to be contacted about your feedback?** Yes

**Q1: The 14 planning objectives developed and used in the DWMP cover the most important issues for drainage and wastewater management in the South-East.**

(2) Agree

**Q2: What changes to the planning objectives would you like to see for future cycles of the DWMP?**

None

**Q3: The BRAVA methodologies set out clearly how the risk assessments have been completed.**

(2) Agree

**Q4: What changes to the risk assessments would you like to see for future cycles of the DWMP?**

None to add

**Q5: The investment strategy for each wastewater system helps me to understand Southern Water's strategic intentions for managing the risks and performance of the wastewater system.**

(2) Agree

**Q6: Working with partner organisations, we selected 71 wastewater systems (covering 81% of our customers) to progress further through the options development and appraisal stage. This feels about the right number for this first round of DWMPs.**

(2) Agree

**Additional comments:**

None

**Q7: It is helpful to use the Source – Pathway – Receptor model when looking at potential options to address the risks.**

(2) Agree

**Q8: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme?**

Ameliorate flood and pollution risks

**Q9: The website helps me to understand the background and process for developing the DWMPs.**

(2) Agree

**Q10: I have found the DWMP webpages informative and easy to navigate.**

(2) Agree

**Q11: What improvements to the website would you like to see?**

**Q12: How can we engage you more effectively as we develop the DWMP?**

Keep up with consultations at individual level

**Q13: I support the overall approach being taken by Southern Water for the first round of DWMP.**

(2) Agree

**Any other comments or feedback that you would like to give us?**

None

## C: River Basin Catchment Consultation

**Response ID:** RIV200      **Organisation:** Customer

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Arun and Western Streams

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(4) Strongly disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Please excuse me if I have inadvertently missed something, but I couldn't see anything for dealing with the massive increase in number of housing developments that are planned in our area (+10,000 new homes West of Chichester). My concern is that WTW have insufficient capacity currently (evidenced by the number of overflow discharges & SW's £90M recent fine). More housing development is certain yet there appears no planned increased infrastructure for it. This will result in further harm to Chichester and Langston harbours which are already in significant decline according the English Nature. Please DO NOT DESTROY this Area of Outstanding Natural Beauty by lack of planning and action.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(5) No opinion

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Only inso far as the Risk Assessment highlights many items in RED, but the Overall Level of Concern is MEDIUM. This is not what the public think and is clearly fudged in favour of your stakeholders!

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(4) Strongly disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(4) Strongly disagree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(4) Strongly disagree

**Additional comments:**



**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(1) Strongly agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Continues pollution of Chichester and Langstone harbours, our river systems that enter them and our coastal waters.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

It's never too late to stop polluting the environment. Please do what its necessary to do this. You have a moral duty to your customers!

**Response ID:** RIV201      **Organisation:** Resident/Customer

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

New Forest

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(5) No opinion

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(5) No opinion

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(5) No opinion

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(5) No opinion

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

SW should look closely at the upstream extremities, from my personal perspective, of especially the Slowhill Copse Catchment area to prevent/significantly reduce the amount of inundation from surface water at time of moderately heavy, neither extreme or exceptional, rainfall. This clearly has immense implications on the treatment as well as the overflow storage volumes that are currently necessary at the final destination treatment facility. If this "process" is extended to all similar outlying/perimeter area of all catchments the results could be beneficial to all including SW's bottom line! It is also a pity the consultation does not allow for any documents to be submitted as this could be explained with so much more clarity.

**Response ID:** RIV202      **Organisation:** Beaulieu Estate and Beaulieu River

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

New Forest

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(5) No opinion

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

We refer to the submissions by the New Forest National Park Authority and the New Forest Catchment Partnership, of which we are a member because much of the Beaulieu River forms part of the Beaulieu Estate. We fully support the points made in these submissions.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(5) No opinion

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

We refer to the submissions by the New Forest National Park Authority and the New Forest Catchment Partnership of which we are a member.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(5) No opinion

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(5) No opinion

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(5) No opinion

**Additional comments:**

We refer to the submissions by the New Forest National Park Authority and the New Forest Catchment Partnership of which we are a member.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

We refer to the submissions by the New Forest National Park Authority and the New Forest Catchment Partnership of which we are a member.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

The Beaulieu Estate would like to be involved in future consultations.

**Response ID:** RIV203      **Organisation:** Customer

**Are you happy to be contacted about your feedback?**

No

**Q1: Which river basin catchment are you giving feedback on?**

North Kent

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Immediate plans to prevent untreated water being discharged during and after heavy rainfall. This is a problem now and will become worse as more homes are built and climate change brings warmer, wetter, winters

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Old waste water systems where rainwater and foul water go into same system. Could we retrofit existing buildings with SUDs to reduce the flow?

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(2) Agree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

It's the urgency that is missing. We have an ongoing problem with untreated foul water being discharged during and after heavy rainfall that must be addressed now

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Ensuring that no untreated waste water is discharged and capacity is increased urgently

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

I'm truly horrified by the current situation and find the discharge of untreated water completely unacceptable. However, I'd prefer you use funds to address it urgently rather than see them go in further fines because you allow the situation to continue

**Response ID:** RIV204      **Organisation:** Faversham Society

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

North Kent

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(3) Disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

With respect to North Swale, we are pleased to see shellfish waters included in 14, and exceedance of DWF in 8, however there is no mention of recreation and communities, which applies where the effluent impacts these and it seems to be assumed that the existing treatment, if it passes the consent is adequate. In Faversham there is a "third world" situation with effluent polluted water being taken back towards the town centre where recreation has now been stopped, on every incoming tide. There is no reference either to discharges of untreated sewage by SW into local chalk streams, notably Thorn Creek, north of the Faversham WTW which we believe receives overflow from the storm tanks at the WTW, and Cooksditch which receives overflow from the pumping station near Gordon Square.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

The analysis again assumed that if the effluent is meeting the consent, then all is well. If the effluent is discharged in a tidal waterway, and is taken back into the town basin on every incoming tide, thus preventing community use of the waterway, this should not be regarded as satisfactory. There is no mention either of discharges of untreated sewage by SW into local chalk streams, notably Thorn Creek, north of the Faversham WTW which we believe receives overflow from the storm tanks at the WTW, and Cooksditch which receives overflow from the pumping station near Gordon Square.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(4) Strongly disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree



**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**  
(2) Agree

**Additional comments:**

Given the number of geographical catchment systems appraised, it might be helpful to have some indication of relative priorities for investment. For example Faversham WWTW catchment has 12 1st and 2nd tier metrics flagged, as high as any other catchment in Kent, yet investment might not be driven by that number.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**  
(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Our concern is Faversham WWTW and Faversham Creek. It is grossly polluted and the effluent flows back into the town basin on every incoming tide. The works meets its consent but that is because it is an old consent inappropriate for today. Southern Water should consider gross pollution, community welfare and recreation as drivers for investment, regardless of consent standards. Regarding the pollution of local chalk streams with untreated sewage, urgent action should be taken to stop those discharges altogether or, where that is not possible in the short term, ensure that any effluent flowing from SW infrastructure into chalk streams is fully treated and will not cause damage to these sensitive and rare ecosystems.

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Today's BBC headline is that "Last week, MPs voted by 268 to 204 to disagree with an amendment to the Environment Bill tabled in the Lords which sought to place a new duty on water companies to reduce raw sewage discharges into rivers and demonstrate reductions in the harm caused by the discharges." That vote has led to a public outcry, suggesting that there is widespread agreement with our contention that existing consent standards set by the Environment Agency on behalf of government are too lax. Southern Water should take opportunities where they exist to up its game and exceed those excessively low standards, especially such vulnerable watercourses as chalk streams.

**Response ID:** RIV205      **Organisation:** Customer

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

North Kent

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(3) Disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

Less abstraction

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(3) Disagree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Have not sufficient information to coment

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(3) Disagree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(3) Disagree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Financial risk

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

**Response ID:** RIV207      **Organisation:** Friends of the Westbrook and Stonebridge Pond

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

North Kent

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(3) Disagree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

The North Kent Catchment contains a number of small streams and ditches that lead from the North Downs aquifer to The Swale. These watercourses, including the Westbrook (the stream looked after by the Friends of the Westbrook and Stonebridge Pond) are vital elements of the network of blue and green infrastructure of the borough and serve as important wildlife as well as drainage corridors. The Westbrook is a chalk stream, a globally rare habitat, defined by the clean, spring-fed water which feeds it. Sadly, however, incidents (related to the capacity of the local combined surface water and sewage system) means that in storm conditions this stream is polluted as sewage overflows into it (as happened on 1st August 2021). This situation will become more severe with growth and climate change. A recognition of the role of these small watercourses and issues they suffer should be included in the DWMP and a Planning Objective added about improving the quality of these receiving watercourses, in particular chalk streams. We welcome the addition of the additional planning objectives from the September 2020 Stakeholder Workshops. However, three objectives identified in the September 2020 workshops but not included here are 'increase surface water separation to reduce CSO discharges', 'reduce the cumulative impacts of discharges to sensitive waters' and 'reduce impacts of chemicals and plastics'. Why have these identified objectives not been included (maybe it is explained somewhere in the documentation, but it is not immediately obvious) and how are these useful objectives reflected in the DWMP? A hyperlink to the explanation of why suggested objectives have been rejected would be welcome and useful. Objectives 1-8 are not set out in this consultation as objectives (goals) merely issues. For instance 'pollution risk' is an issue, the objective should be 'prevent pollution risk' (for similar). As such these objectives are somewhat misleading. The titles of planning objectives are not consistent across the consultation. For instance, objective 14 is variously listed as 'protect shellfish water quality' and 'improve shellfish water quality'. I would always advocate for the more ambitious standard 'improve' but at any rate, the objectives should be consistent.

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(3) Disagree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

Hydraulic overload is certainly a risk in the Faversham area and as such I'm surprised that it is not recognised in the DWMP as a 'very significant' issue. Hydraulic overload relates very closely to other 'very significant' issues of internal sewage flooding, storm overflow performance and nutrient neutrality. The risks to small watercourses such as the Westbrook and other chalk streams is not identified in the DWMP and is an omission - particularly given the fact that chalk streams are globally rare habitats. The Westbrook drains into Faversham Creek. One unrecognised risk is the pollution risk to Faversham Creek from untreated effluent discharged at the WTW which is then washed upstream on an incoming tide. Furthermore, the DWMP does not recognise the value of recreation within the catchment eg dinghy sailing, swimming, canoeing on Faversham Creek. These are currently unsafe activities due to the incidents of untreated sewage in the Creek (on top of any pollution incidents upstream). This pollution is not sufficiently recognised in the DWMP (bathing water quality is not seen as an issue in the catchment). However, poor water quality is inhibiting the regeneration of Faversham Creek for use by the community. Southern Water need to work with the Environment Agency on reviewing the standards set and the monitoring of these standards to ensure that they are fit for purpose in the 21st century.

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

The investment strategy for the North Kent Catchment does assist with an understanding of SW's strategic intentions. The fact that all of the wastewater systems across the North Kent Catchment have a proposed investment strategy to IMPROVE is welcomed, although it is a sad reflection of the poor quality and lack of sustained investment in the drainage and wastewater infrastructure across the area. We welcome the inclusion of Faversham in the options development and appraisal stage.

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

1

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

The impacts of climate change and growth. - Separation of surface water systems from sewage as an approach to be considered and invested in alongside SUDS and customer education . - Recognition that SUDS is often outside the control of Southern Water. Who would control implementation and monitoring of SUDS and who would pay for it? - Improved monitoring and standards, including of bathing water quality (working with the EA)

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

The website is informative to an extent as it contained a lot of extremely useful information, but it is difficult to navigate and feel confident that everything has been read. A Contents page could help with this. To make consultation input easier, this Consultation page should contain hyperlinks to the relevant sections of the website. Also, a word version of the consultation response form should be provided so that respondents can prepare (and save) their answers ahead of submission. Missing from the website is mapping of incidents and monitoring locations. These would be extremely useful for the community to see and would be a useful reference point for those people who submit reports of incidents to SW and want to be confident these issues are being followed up.

**Response ID:** RIV206      **Organisation:** Private Customer

**Are you happy to be contacted about your feedback?**

Yes

**Q1: Which river basin catchment are you giving feedback on?**

Test and Itchen

**Q2: The 14 planning objectives cover the most important issues within this river basin catchment.**

(2) Agree

**Q3: What additional planning objectives should be developed for this river basin catchment, if any?**

**Q4: The risk assessment helps me to understand more about the potential risks and issues in this river basin catchment.**

(2) Agree

**Q5: Are there any major drainage and wastewater risks in this river basin catchment that have not been highlighted by the risk assessment?**

**Q6: The proposed investment strategy looked or felt about right for the wastewater systems in this river basin catchment.**

(3) Disagree

**Q7: The problem characterisation helped me to understand the current and future challenges associated with population growth and climate change within this river basin catchment.**

(2) Agree

**Q8: I broadly agree with the choice of wastewater systems selected to progress into the options development stage in this river basin catchment.**

(2) Agree

**Additional comments:**

**Q9: It is helpful to map the generic options that Southern Water will be considering in the options development stage of the DWMP.**

(2) Agree

**Q10: We will be developing our DWMP investment programme early in 2022. What issues or risks should be the focus for our future investment programme in this river basin catchment?**

Storm overflows:

**Any other comments or feedback that you would like to give us on the DWMP for this river basin catchment?**

Overview of the Test and Itchen Catchment - 2nd para says "...Bourne Rivulet which rises at Testbourne in the North Wessex Downs Area of Outstanding Natural Beauty....". No it doesn't.