

Daniel Johns  
By email

20<sup>th</sup> February 2023

Dear Daniel,

## Re: Consultation on the draft Regional Water Resources Plan

I am writing on behalf of members of Blueprint for Water<sup>1</sup> to share with you our thoughts on the draft plan for water resources across the east. As you know, Blueprint members have a keen interest in securing sustainable water resources, and published our '[10 Asks' of Regional Water Resources Plans](#) in 2021. We also published a [blog](#) this month which looks at the headlines for both the draft regional and company scale water resources plans.

As national organisations we struggle to respond in detail to the five regional plan consultations and company scale dWRMPs, so instead we have undertaken reviews of both the emerging and the draft plans against these 10 asks. Our specific thoughts on the WRE Draft Plan are set out below.

### Meeting the needs of the environment first

Although the core plan is based around achieving the BAU+ environmental destination, we are pleased to see that the Board of WRE are committed to try to achieve the Enhance environmental destination scenario and will keep this under active review.

We want to see the plans prioritising the delivery and maintenance of a healthy water environment before making additional water available to abstraction for PWS, energy or other sectors. Where there is uncertainty we should adopt the government's [precautionary principle](#), ensuring the needs of the environment are being met until the evidence shows that any additional abstraction does not result in unacceptable impacts on it.

In terms of investigations linked to meeting future environmental needs we cannot allow these to drag on beyond the next investment period (2025-30). We want to see action on the ground before 2030 and decisions on further licence reductions to meet the needs of the environment need to be made by 2030. We are pleased to see that the draft plan broadly adopts this approach.

### Delivering 20% biodiversity net gain

We are pleased to see the plan commit to deliver at least 10% biodiversity net gain (BNG) with regards to new supply options and the link is made to Local Nature Recovery Strategies (this link has

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<sup>1</sup> Blueprint for Water is part of [Wildlife and Countryside Link](#), a coalition of 69 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

not been made in other plans). 10% BNG is the legal minimum and we would hope that WRE can be more ambitious than this, targeting 20% in the final plan.

### **Supporting the Achievement of Net Zero as soon as possible**

We are pleased to read in the plan that the analysis of options included consideration of their carbon impacts and opportunities to decarbonise. However, little detail is provided on this aspect and the degree to which net zero considerations have influenced any key decisions.

### **Supporting the delivery of national water demand reduction targets**

We are pleased to see that the plan now includes significantly more detail on demand reduction compared to the Emerging Plan. We are also pleased to see that the plan now achieves the 110 lppd PCC and 50% leakage reduction targets, with policy support. However, the plan is still weak on reducing non-household PWS demand. This is perhaps not surprising as there is a lack of any substantive programmes in the dWRMP from Anglian Water and Essex & Suffolk Water despite the 9% Environment Act reduction target and Ofwat's performance commitment to reduce NHH demand. This is an area that still needs to be improved in the final plan although we do appreciate that options are being looked at in the region.

### **Ensuring all abstractors play their part in reducing demand**

Whilst the draft plan remains strong in identifying the potential water needs of other sectors we also want to see commitments from those sectors to reduce or optimise their demand through water use efficiency. We support calls in the plan for funding to improve water resource planning in other sectors and for co-funding of solutions.

### **Reducing the impact of new development on water resources**

The link between rising demand, development and building regulations is much more clearly expressed in the Draft Plan which is positive. We are pleased to see the draft plan supporting more ambitious building regulations. The final plan can refer to the 10 actions for more water efficient buildings set out in the Environment Improvement Plan (p117-118). There is a reference made in the plan to the potential need for new development to be water neutral. However, we still feel WRE should take a more positive position on this and positively advocate that new development in water stressed areas should minimise its additional water footprint.

We do have a specific concern around the huge jump in water needs from the energy sector. It is essential that wherever possible new water-hungry energy supply options should be sited in places where there is already water available and they should not add to existing water availability problems. If they are progressed and new water supply solutions are needed then appropriate financial contributions to shared solutions need to be provided by the private energy companies.

### **Delivering multiple benefits through nature-based solutions**

In common with the other regional plans, the WRE draft plan highlights that the solutions being considered have the potential to provide multiple benefits – not just protecting or boosting water supplies, but reducing pollution, lessening flood risk or boosting biodiversity. Nature-based solutions are particularly good at doing this however it is not clear whether nature-based solutions are being actively prioritised. That said it is welcome that the plan identifies opportunities to investigate the



benefits and possible funding mechanisms for nature-based solutions helping build the evidence base so that nature-based solutions can be more readily employed in future.

### **Working in partnership and committing to keep engaging with stakeholders**

We remain impressed by the broad range of organisations that have been engaged as part of the development of the WRE draft plan and are pleased to see more detail on future multi-sector working at regional and catchment scale.

Overall, we welcome the efforts and approach of the regional groups to date, and consider regional planning to be a significant and welcome step forward in addressing the abstraction pressures faced by our water environment.

Currently [nearly a fifth](#) of our surface waters, and over a quarter of groundwaters, do not have enough water to protect the environment and to meet the needs of fish and other aquatic life, and this situation will only worsen with climate change and increases in demand. We therefore challenge Water Resources East to go further to address the aspects raised in the final plan.

Very best,

Ali Morse  
Water Policy Manager, The Wildlife Trusts, and Chair, Blueprint for Water

Granville Davies  
By email

20<sup>th</sup> February 2023

Dear Granville,

## Re: Consultation on the draft Regional Water Resources Plan

I am writing on behalf of members of Blueprint for Water<sup>2</sup> to share with you our thoughts on the draft plan for Water Resources North. As you know, Blueprint members have a keen interest in securing sustainable water resources, and published our ['10 Asks' of Regional Water Resources Plans](#) in 2021. We also published a [blog](#) this month which looks at the headlines for both the draft regional and company scale water resources plans.

As national organisations we struggle to respond in detail to the five regional plan consultations and company scale dWRMPs, so instead we have undertaken reviews of both the emerging and the draft plans against these 10 asks. Our specific thoughts on the WReN Draft Plan are set out below.

### Meeting the needs of the environment first

We are pleased to see that the detail on environmental destination is clearer in this draft, compared to the emerging plan.

We want to see the plans prioritising the delivery and maintenance of a healthy water environment before making additional water available to abstraction for PWS, energy or other sectors. Where there is uncertainty we should adopt the government's [precautionary principle](#), ensuring the needs of the environment are being met until the evidence shows that any additional abstraction does not result in unacceptable impacts on it.

We cannot allow investigations into meeting future environmental needs to drag on beyond the next investment period (2025-30). We want to see action on the ground before 2030 and decisions on further licence reductions to meet the needs of the environment need to be made by 2030.

### Delivering 20% biodiversity net gain

Whilst the plan identifies the importance of supporting Government objectives for biodiversity, and identifies that biodiversity optimisation was a consideration in decision-making, we are concerned that further investigations are required to establish how to achieve the legal minimum requirement of 10% biodiversity net gain (BNG) from new supply solutions. Further investigations and delay cannot be acceptable if WReN is to meet these legal requirements, and to make a contribution towards achieving the Environment Act target to halt the decline of nature by 2030.

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<sup>2</sup> Blueprint for Water is part of [Wildlife and Countryside Link](#), a coalition of 69 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.



We would hope that WReN can show greater ambition in committing to deliver at least 20% BNG, and contributing to the recovery of nature wherever possible. For example, this could be achieved through supporting Local Nature Recovery Strategies, as set out in Water Resources East's plan.

### **Supporting the Achievement of Net Zero as soon as possible**

We are disappointed that the plan does not offer greater detail about how ambitions within the Water Industry Routemap 2030 will be met.

That the carbon impact of alternative options is clearly set out within the plan, and that 'minimising carbon' was one of the criteria for determining the 'best-value plan', is positive. However, that the plan states further investigation of new supply solutions is required to reduce operational carbon in line with net zero targets suggests that there is uncertainty about the assessed carbon impacts of the proposed options.

### **Supporting the delivery of national water demand reduction targets**

We are pleased to see that the plan achieves the 110 lppd PCC and 50% leakage reduction targets without policy support, and that the plan can achieve lower than 110 lppd PCC with policy support such as mandatory labelling. It is also positive to see that the draft plan includes greater detail on demand reduction than the emerging plan.

However, we are disappointed that the plan remains very weak on reducing non-household (NHH) PWS demand. Northumbrian Water forecasts a 33% increase in NHH demand, despite the Environment Agency's 9% reduction target and the NHH demand reduction performance commitment from Ofwat. This is an area that would benefit from improvement in the final plan.

### **Ensuring all abstractors play their part in reducing demand**

We are pleased to see some improvements made in this area since the emerging plan, including some regional non-PWS abstractor consultation. However, demand reduction commitments are still limited. We want to see commitments from non-PWS sectors to reduce or optimise their demand through water use efficiency. We also have concerns that a huge increase in water use from the energy sector is predicted, and yet is not included in the core plan due to uncertainties.

### **Reducing the impact of new development on water resources**

We are disappointed to see that the draft plan includes very little on reducing the impact of new development on water resources, with just one passing reference to building regulations. This amounts to a step backwards from the emerging plan.

Where new water-intensive development is proposed in areas with no surplus water, or in areas classified as seriously water stressed, we want to see the regional plan committing water companies to work with developers and local authorities to reduce additional water demand. This should be in addition to measures to manage increased sewerage and wastewater from new development, including and where possible prioritising the use of nature-based solutions. The feasibility of the new development being water neutral should also be explored.

We also have concerns about the huge jump in water needs from the power sector. It is essential that, wherever possible, new water-hungry energy supply options should be sited in places where there is already water available, and they should not add to existing water availability problems. If

they are progressed and new water supply solutions are needed, then appropriate financial contributions to shared solutions need to be provided by the private energy companies.

### **Delivering multiple benefits through nature-based solutions**

Nature-based solutions (NBS) can cost-effectively deliver multiple benefits, for example, reducing pollution, flood risk, and providing environmental enhancement in addition to increasing the resilience of water supplies.

The plan does assess options based on their ability to deliver multiple benefits. However, it does not identify the importance or prioritise the use of NBS. The plan should go further in identifying opportunities for using NBS, investigating the benefits and possible funding mechanisms to enable this and thereby helping to build the evidence base. This would then allow WReN to be more ambitious, and preferentially choose these NBS options in future.

### **Working in partnership and committing to keep engaging with stakeholders**

It is positive that a range of organisations have been engaged in the development of WReN's draft plan, and we would welcome further detail about how this stakeholder engagement and multi-sector working will continue once the plan has been published.

However, we remain concerned that stakeholders may struggle to meaningfully engage with the full content of the plan, as the formatting and style means that much of the information is hard to digest. We suggest that the plan would benefit from substantial changes to the presentation and structure in order to make the content more accessible to all stakeholders. For example, the plan would benefit from more engaging presentation of details that can currently only be found in raw data format.

Overall, we welcome the efforts and approach of the regional groups to date, and consider regional planning to be a significant and welcome step forward in addressing the abstraction pressures faced by our water environment.

Currently [nearly a fifth](#) of our surface waters, and over a quarter of groundwaters, do not have enough water to protect the environment and to meet the needs of fish and other aquatic life, and this situation will only worsen with climate change and increases in demand. We therefore challenge Water Resources North to go further to address the aspects raised in the final plan.

Very best,



Ali Morse  
Water Policy Manager, The Wildlife Trusts, and Chair, Blueprint for Water

Trevor Bishop  
By email

20<sup>th</sup> February 2023

Dear Trevor,

## Re: Consultation on the draft Regional Water Resources Plan

I am writing on behalf of members of Blueprint for Water<sup>3</sup> to share with you our thoughts on the draft plan for water resources across the south east. As you know, Blueprint members have a keen interest in securing sustainable water resources, and published our '[10 Asks' of Regional Water Resources Plans](#) in 2021. We also published a [blog](#) this month which looks at the headlines for both the draft regional and company scale water resources plans.

As national organisations we struggle to respond in detail to the five regional plan consultations and company scale dWRMPs, so instead we have undertaken reviews of both the emerging and the draft plans against these 10 asks. Our specific thoughts on the WRSE Draft Plan are set out below.

### Meeting the needs of the environment first

It is extremely welcome that key branch points in the adaptive plan have been brought forward from 2040 and 2060 in the emerging plan, to 2030 and 2035 in the draft regional plan. This means that decisions on the schemes needed to deliver environmental improvement will be taken, and those schemes then delivered, much earlier.

It is also welcome that the 'reported pathway' maps to abstraction reductions required in a 'high environmental improvement and climate change' scenario. However, it is unclear to what extent this scenario exceeds the minimum environmental requirements set out in the Environment Agency's BAU+ scenario. BAU+ represents the *minimum* level regulators expect water companies to plan for through their WRMPs, whereas the enhanced scenario takes into account additional long-term requirements for sites with environmental designations, principal salmon rivers, and chalk streams. Given the environmental importance of the environment in the south east, and the responsibility of WRSE water companies for securing the recovery of a globally important chalk stream resource, we would expect to see a clearer commitment to applying the most sensitive flow constraints on these rivers. In addition, it would be helpful to see pathways that are not compliant with minimum environmental standards marked as such, in order to aid customer understanding of the alternative scenarios.

We want to see the plans prioritising the delivery and maintenance of a healthy water environment before making additional water available to abstraction for PWS, energy or other sectors. Where there is uncertainty we should adopt the government's [precautionary principle](#), ensuring the needs

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of the environment are being met until the evidence shows that any additional abstraction does not result in unacceptable impacts on it.

Investigations linked to meeting future environmental needs are scheduled to be carried out by WRSE water companies over the next ten years. We recommend that these are completed within the next investment period (2025-30), so that scheme delivery can be the focus post-2030. We would also welcome any opportunity to bring the environmental decision point further forward; WRE's plan for example broadly sees decisions on further licence reductions to meet the needs of the environment being made by 2030.

### **Delivering 20% biodiversity net gain**

The Technical Appendix to the draft plan shows that the options decision-making process was based on modelling that factored in 10% Biodiversity Net Gain (BNG). This is welcome, though as the legal minimum we would hope that WRSE can be more ambitious than this, targeting 20% in the final plan. In addition, in common with most of the draft plans, no reference is made to Local Nature Recovery Strategies; these should be used to guide delivery of BNG to ensure that preferred options contribute more strategically to the recovery of nature.

### **Supporting the Achievement of Net Zero as soon as possible**

We are pleased to read in the plan that carbon impacts and opportunities to mitigate the carbon intensity of options have been considered via model runs; noting the tension between a plan optimised for carbon and one optimised for other 'best value' metrics such as natural capital or BNG, we would welcome consideration of how residual carbon emissions could be best offset.

### **Supporting the delivery of national water demand reduction targets**

We are pleased to see that the plan achieves the 110 lppd PCC and 50% leakage reduction targets, with policy support. It is important that Government understands that the Regional Plans are prefaced upon policy change, and that the earlier changes are made, the sooner water savings which protect the environment could be delivered.

However, the plan still lacks detail on non-household PWS usage and potential savings.

Government's Environmental Improvement Plan confirms non-household use should be reduced by 9% by 2038 and 15% by 2050 as a contribution towards achieving Environment Act targets, so the final plan should include more detail on how this will be supported.

### **Ensuring all abstractors play their part in reducing demand**

Currently only 3% of water use in the area is for non-public water supply, nevertheless the draft plan has made efforts to identify the potential water needs of other sectors, and to identify opportunities to share water resources with other sector within the best value plan. We support proposals in the plan for work to further understand the water resource needs of other sectors and to explore co-funding of solutions. We also want to see commitments from those sectors to reduce or optimise their demand through water use efficiency.

### **Reducing the impact of new development on water resources**

As discussed above re supportive policy, it is welcome that the plan recognises the role of tighter building regulations. The final plan can refer to the 10 actions for more water efficient buildings set out in the Environment Improvement Plan (p117-118). However there is no reflection of the role that water neutrality could play, despite this being a live issue already for WRSE companies (e.g.



Sussex north requirements, Thames' incentive scheme). We feel WRSE should take a more positive position on this, advocating that new development in water stressed areas should minimise its additional water footprint.

Although the expected growth in demand from other sectors such as energy is less in the WRSE area than in many other regions, we welcome the inclusion of multi-sector options that seek to service the additional demand from this expected growth. Given that new water-hungry energy supply options will add to existing water availability problems in the region, appropriate financial contributions to shared solutions need to be provided by the private energy companies.

### **Delivering multiple benefits through nature-based solutions**

In common with the other regional plans the WRSE draft plan highlights that the solutions being considered have the potential to provide multiple benefits – reducing pollution, lessening flood risk or boosting biodiversity. Nature-based solutions are particularly good at doing this so it is welcome that the plan discusses catchment and nature-based schemes that could improve the water sources the plan relies upon. Is it therefore disappointing that only schemes on the Test and Itchen in Hampshire are included, since it seems regulatory guidance dissuades schemes which do not directly secure water resources. We consider the benefit of such solutions as being the resilience they provide to those waters from which abstraction occurs, and query whether the plan could do more to make the case for the inclusion of such schemes and to help build the evidence base so that nature-based solutions can be more readily employed in future.

### **Working in partnership and committing to keep engaging with stakeholders**

The plan includes a helpful breakdown of customer and stakeholder engagement to date and discusses how the plan has evolved in response to their input. It is important that this engagement now continues as the plan is finalised and that stakeholder involvement remains strong in the post-adoption stage, particularly regarding the ongoing identification of multi-sector water resources and nature-based solutions.

Overall, we welcome the efforts and approach of the regional groups to date, and consider regional planning to be a significant and welcome step forward in addressing the abstraction pressures faced by our water environment.

Currently [nearly a fifth](#) of our surface waters, and over a quarter of groundwaters, do not have enough water to protect the environment and to meet the needs of fish and other aquatic life, and this situation will only worsen with climate change and increases in demand. We therefore challenge Water Resources South East to go further to address the aspects raised in the final plan.

Very best,



Ali Morse  
Water Policy Manager, The Wildlife Trusts, and Chair, Blueprint for Water

Dan Rogerson  
By email

20<sup>th</sup> February 2023

Dear Dan,

## Re: Consultation on the draft Regional Water Resources Plan

I am writing on behalf of members of Blueprint for Water<sup>4</sup> to share with you our thoughts on the draft plan for Water Resources West. As you know, Blueprint members have a keen interest in securing sustainable water resources, and published our '[10 Asks](#)' of Regional Water Resources Plans in 2021. We also published a [blog](#) this month which looks at the headlines for both the draft regional and company scale water resources plans.

As national organisations we struggle to respond in detail to the five regional plan consultations and company scale dWRMPs, so instead we have undertaken reviews of both the emerging and the draft plans against these 10 asks. Our specific thoughts on the WRW Draft Plan are set out below.

### Meeting the needs of the environment first

The plan clearly states the already poor condition of many surface and ground waters in the WRW region, and identifies current over-abstraction as a key stressor. The climate and biodiversity crises are impacting an already-stressed environment, and this impact will continue to worsen. In this context, it is imperative that plans prioritise the delivery and maintenance of a healthy water environment before making additional water available to abstraction for PWS, energy or other sectors. Where there is uncertainty plans should adopt the government's [precautionary principle](#), ensuring the needs of the environment are being met until the evidence shows that any additional abstraction does not result in unacceptable impacts on it.

It is positive that the BAU+ scenario accounts for a dry climate impacted future. However, the plan states that the 'enhanced' scenario and 'BAU+' scenario are very similar, and that 80% of stakeholders support the greater level of ambition in the 'enhanced' scenario. Given these factors, it is disappointing and unclear why the Board of WRW have not committed to trying to achieve the 'enhanced' environmental destination scenario.

### Delivering 20% biodiversity net gain

We are pleased to see the plan commit to deliver at least 10% biodiversity net gain (BNG) with regards to new supply options. 10% BNG is the legal minimum and we would hope that WRW can be more ambitious than this, targeting 20% in the final plan. We also hope that the final plan reflects the need to align delivery of BNG with Local Nature Recovery Strategies, as set out in the Water Resources East plan.

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## **Supporting the Achievement of Net Zero as soon as possible**

We are pleased that an intended outcome of the plan is to deliver against net zero targets for England and Wales. We are also pleased that the analysis of options included consideration of their carbon impacts and opportunities to decarbonise. However, as it stands the route to delivering this outcome is unclear as little detail is provided on how the carbon intensity of options has influenced key decisions. For instance, it is not clear that preferential consideration has been given to lower-intensity options. Delivering on net zero targets will require the final plan to demonstrate the cumulative impact of solutions in reducing total carbon emissions.

## **Supporting the delivery of national water demand reduction targets**

We are pleased to see that the plan now includes more detail on demand reduction compared to the Emerging Plan. We are also pleased to see that the plan achieves the 110 lppd PCC and 50% leakage reduction targets, with policy support. However, the plan does not sufficiently detail the need to manage non-household demand or methods to do so. More detailed options for reducing non-household demand need to be included in the plan, demonstrating the need to meet the 9% Environment Act reduction target and Ofwat's performance commitment to reduce NHH demand.

## **Ensuring all abstractors play their part in reducing demand**

Whilst the draft plan remains strong in identifying the potential water needs of other sectors, we also want to see commitments from those sectors to reduce or optimise their demand through water use efficiency. We support calls in the plan for funding to improve water resource planning in other sectors and for co-funding of solutions.

## **Reducing the impact of new development on water resources**

We are pleased to see the plan recognises and supports the Government roadmap towards greater water efficiency in new developments and retrofits. We are also pleased that the WRW evidence paper on water efficiency will be used to inform local plans with regards to policy on per person per day targets for new developments.

We recognise the positive step the plan takes to consider rainwater harvesting and reuse in demand management options, but we encourage WRW to go further and include clearer and more developed options for water neutrality.

We do have a specific concern around the huge jump in water needs from energy use. It is essential that wherever possible new water-hungry energy supply options should be sited in places where there is already water available and they should not add to existing water availability problems. If they are progressed and new water supply solutions are needed then appropriate financial contributions to shared solutions need to be provided by the private energy companies.

## **Delivering multiple benefits through nature-based solutions**

In common with the other regional plans, the WRW draft plan highlights that the solutions being considered have the potential to provide multiple benefits – not just protecting or boosting water supplies, but reducing pollution, lessening flood risk or boosting biodiversity. Nature-based solutions are particularly good at doing this; however, it is not clear that plan recognises their full potential. It

is positive that the plan identifies opportunities to investigate the benefits and possible funding mechanisms for nature-based solutions helping build the evidence base so that nature-based solutions can be more readily employed in future. We would welcome more information about whether nature-based solutions are being actively prioritised in the near-term.

### **Working in partnership and committing to keep engaging with stakeholders**

We remain impressed by the broad range of organisations that have been engaged as part of the development of the WRW draft plan. In the final plan, we would welcome more detailed information about how this engagement will continue into the future and how it will support multi-sector working at regional and catchment scale.

Overall, we welcome the efforts and approach of the regional groups to date, and consider regional planning to be a significant and welcome step forward in addressing the abstraction pressures faced by our water environment.

Currently [nearly a fifth](#) of our surface waters, and over a quarter of groundwaters, do not have enough water to protect the environment and to meet the needs of fish and other aquatic life, and this situation will only worsen with climate change and increases in demand. We therefore challenge Water Resources West to go further to address the aspects raised in the final plan.

Very best,



Ali Morse

Water Policy Manager, The Wildlife Trusts, and Chair, Blueprint for Water