

# Appendix I - List of Respondents, Reference Numbers and Location of Detailed Response

NB: Individuals will be contacted and advised of their reference numbers.

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
C1		Individual	C1.1	Table 8A
C2		Individual	C2.1	Table 8L
C3		Individual	C3.1	Table 8L
C4		Individual	C4.1	Table 8H
C5		Individual	C5.1	Table 8H
C6		Individual	C6.1	Table 8H
C6		Individual	C6.2	Table 8H
C7		Individual	C7.1	Table 8D
C8		Individual	C8.1	Table 8H
C8		Individual	C8.2	Table 8H
C9		Individual	C9.1	Table 8B
C9		Individual	C9.2	Table 8G
C9		Individual	C9.3	Table 8F
C9		Individual	C9.4	Table 8H
C10		Individual	C10.1	Table 8D
C11		Individual	C11.1	Table 8F
C11		Individual	C11.2	Table 8F
C11		Individual	C11.3	Table 8B
C12		Individual	C12.1	Table 8D
C12		Individual	C12.2	Table 8H
C12		Individual	C12.3	Table 8D

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
C13		Individual	C13.1	Table 8K
C14		Individual	C14.1	Table 8A
C15		Individual	C14.2	Table 8D
C15		Individual	C14.3	Table 8H
C15		Individual	C15.1	Table 8H
C15		Individual	C15.2	Table 8H
C15		Individual	C15.3	Table 8H
C15		Individual	C15.4	Table 8H
C16		Individual	C16.1	Table 8D
C17		Individual	C17.1	Table 8D
C18		Individual	C18.1	Table 8D
C19		Individual	C19.1	Table 8L
C20		Individual	C20.1	Table 8D
C21		Individual	C21.1	Table 8D
C22		Individual	C22.1	Table 8A
C22		Individual	C22.2	Table 8H
C22		Individual	C22.3	Table 8F
C22		Individual	C22.4	Table 8L
C22		Individual	C22.5	Table 8D
C22		Individual	C22.6	Table 8D
C22		Individual	C22.7	Table 8H

**Appendix I : List of Respondents, Reference Numbers and Location of Detailed Response**

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
C22		Individual	C22.8	Table 8H
C22		Individual	C22.9	Table 8H
C22		Individual	C22.10	Table 8H
C22		Individual	C22.11	Table 8H
C22		Individual	C22.12	Table 8H
C22		Individual	C22.13	Table 8H
C22		Individual	C22.14	Table 8F
C22		Individual	C22.15	Table 8F
C23		Individual	C23.1	Table 8H
C24		Individual	C24.1	Table 8D
C25		Individual	C25.1	Table 8K
C26		Individual	C26.1	Table 8H
A1	Wokingham Borough Council	Local Authority	A1.1	Table 8D
A1	Wokingham Borough Council	Local Authority	A1.2	Table 8D
A1	Wokingham Borough Council	Local Authority	A1.3	Table 8L
A1	Wokingham Borough Council	Local Authority	A1.4	Table 8D
A1	Wokingham Borough Council	Local Authority	A1.5	Table 8H
A1	Wokingham Borough Council	Local Authority	A1.6	Table 8H
A1	Wokingham Borough Council	Local Authority	A1.7	Table 8A
A2	East Hampshire District Council	Local Authority	A2.1	Table 8H
A2	East Hampshire District Council	Local Authority	A2.2	Table 8H
A3	Wealden District Council	Local Authority	A3.1	Table 8H
A3	Wealden District Council	Local Authority	A3.2	Table 8H

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
A3	Wealden District Council	Local Authority	A3.3	Table 8H
A3	Wealden District Council	Local Authority	A3.4	Table 8H
A3	Wealden District Council	Local Authority	A3.5	Table 8H
A3	Wealden District Council	Local Authority	A3.6	Table 8H
A3	Wealden District Council	Local Authority	A3.7	Table 8H
A4	South Downs National Park Authority	Local Authority	A4.1	Table 8H
A4	South Downs National Park Authority	Local Authority	A4.2	Table 8B
A4	South Downs National Park Authority	Local Authority	A4.3	Table 8A
A4	South Downs National Park Authority	Local Authority	A4.4	Table 8H
A4	South Downs National Park Authority	Local Authority	A4.5	Table 8H
A4	South Downs National Park Authority	Local Authority	A4.6	Table 8A
A4	South Downs National Park Authority	Local Authority	A4.7	Table 8A
A4	South Downs National Park Authority	Local Authority	A4.8	Table 8C

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
A4	South Downs National Park Authority	Local Authority	A4.9	Table 8C
A4	South Downs National Park Authority	Local Authority	A4.10	Table 8D
A4	South Downs National Park Authority	Local Authority	A4.11	Table 8D
A4	South Downs National Park Authority	Local Authority	A4.12	Table 8D
A4	South Downs National Park Authority	Local Authority	A4.13	Table 8G
A4	South Downs National Park Authority	Local Authority	A4.14	Table 8H
A4	South Downs National Park Authority	Local Authority	A4.15	Table 8H
A4	South Downs National Park Authority	Local Authority	A4.16	Table 8A
A4	South Downs National Park Authority	Local Authority	A4.17	Table 8H
A4	South Downs National Park Authority	Local Authority	A4.18	Table 8H
A4	South Downs National Park Authority	Local Authority	A4.19	Table 8H

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
A5	Rother District Council	Local Authority	A5.1	Table 8A
A5	Rother District Council	Local Authority	A5.2	Table 8H
A5	Rother District Council	Local Authority	A5.3	Table 8D
A5	Rother District Council	Local Authority	A5.4	Table 8D
A5	Rother District Council	Local Authority	A5.5	Table 8H
A5	Rother District Council	Local Authority	A5.6	Table 8D
A5	Rother District Council	Local Authority	A5.7	Table 8H
A6	Ashford Borough Council	Local Authority	A6.1	Table 8H
A6	Ashford Borough Council	Local Authority	A6.2	Table 8D
A6	Ashford Borough Council	Local Authority	A6.3	Table 8H
A6	Ashford Borough Council	Local Authority	A6.4	Table 8H
A6	Ashford Borough Council	Local Authority	A6.5	Table 8H
A6	Ashford Borough Council	Local Authority	A6.6	Table 8H
A6	Ashford Borough Council	Local Authority	A6.7	Table 8D
A6	Ashford Borough Council	Local Authority	A6.8	Table 8L
A7	Lewes District Council	Local Authority	A7.1	Table 8B
A7	Lewes District Council	Local Authority	A7.2	Table 8H

**Appendix I : List of Respondents, Reference Numbers and Location of Detailed Response**

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
A7	Lewes District Council	Local Authority	A7.3	Table 8H
A7	Lewes District Council	Local Authority	A7.4	Table 8H
A7	Lewes District Council	Local Authority	A7.5	Table 8H
A7	Lewes District Council	Local Authority	A7.6	Table 8H
A7	Lewes District Council	Local Authority	A7.7	Table 8H
A8	Surrey County Council	Local Authority	A8.1	Table 8D
A8	Surrey County Council	Local Authority	A8.2	Table 8D
A8	Surrey County Council	Local Authority	A8.3	Table 8H
A8	Surrey County Council	Local Authority	A8.4	Table 8H
A8	Surrey County Council	Local Authority	A8.5	Table 8H
A8	Surrey County Council	Local Authority	A8.6	Table 8H
A8	Surrey County Council	Local Authority	A8.7	Table 8L
A8	Surrey County Council	Local Authority	A8.8	Table 8H
A8	Surrey County Council	Local Authority	A8.9	Table 8A
A8	Surrey County Council	Local Authority	A8.10	Table 8H
A9	Canterbury City Council	Local Authority	A9.1	Table 8H
A9	Canterbury City Council	Local Authority	A9.2	Table 8H

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
A9	Canterbury City Council	Local Authority	A9.3	Table 8H
A9	Canterbury City Council	Local Authority	A9.4	Table 8D
A10	East Sussex County Council	Local Authority	A10.1	Table 8A
A10	East Sussex County Council	Local Authority	A10.2	Table 8H
A10	East Sussex County Council	Local Authority	A10.3	Table 8H
A10	East Sussex County Council	Local Authority	A10.4	Table 8H
A10	East Sussex County Council	Local Authority	A10.5	Table 8H
A10	East Sussex County Council	Local Authority	A10.6	Table 8H
A10	East Sussex County Council	Local Authority	A10.7	Table 8H
A10	East Sussex County Council	Local Authority	A10.8	Table 8I
A10	East Sussex County Council	Local Authority	A10.9	Table 8H
A10	East Sussex County Council	Local Authority	A10.10	Table 8D
A10	East Sussex County Council	Local Authority	A10.11	Table 8H
A11	Hart District Council	Local Authority	A11.1	Table 8B
A11	Hart District Council	Local Authority	A11.2	Table 8H
A11	Hart District Council	Local Authority	A11.3	Table 8H
A12	Swale Borough Council	Local Authority	A12.1	Table 8D
A12	Swale Borough Council	Local Authority	A12.2	Table 8D

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
A12	Swale Borough Council	Local Authority	A12.3	Table 8H
A12	Swale Borough Council	Local Authority	A12.4	Table 8H
A12	Swale Borough Council	Local Authority	A12.5	Table 8H
A12	Swale Borough Council	Local Authority	A12.6	Table 8D
A13	Dartford Borough Council	Local Authority	A13.1	Table 8H
A13	Dartford Borough Council	Local Authority	A13.2	Table 8H
A13	Dartford Borough Council	Local Authority	A13.3	Table 8F
A13	Dartford Borough Council	Local Authority	A13.4	Table 8H
A14	Kent County Council	Local Authority	A14.1	Table 8B
A14	Kent County Council	Local Authority	A14.2	Table 8H
A14	Kent County Council	Local Authority	A14.3	Table 8D
A14	Kent County Council	Local Authority	A14.4	Table 8D
A14	Kent County Council	Local Authority	A14.5	Table 8D
A14	Kent County Council	Local Authority	A14.6	Table 8H
A14	Kent County Council	Local Authority	A14.7	Table 8H
A14	Kent County Council	Local Authority	A14.8	Table 8A
A14	Kent County Council	Local Authority	A14.9	Table 8H
A14	Kent County Council	Local Authority	A14.10	Table 8H
A14	Kent County Council	Local Authority	A14.11	Table 8H
A14	Kent County Council	Local Authority	A14.12	Table 8H
A14	Kent County Council	Local Authority	A14.13	Table 8H
A14	Kent County Council	Local Authority	A14.14	Table 8H
A14	Kent County Council	Local Authority	A14.15	Table 8F
A14	Kent County Council	Local Authority	A14.16	Table 8H
P1	Slaugham Parish Council	Parish/Town Council	P1.1	Table 8A

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
P1	Slaugham Parish Council	Parish/Town Council	P1.2	Table 8D
P1	Slaugham Parish Council	Parish/Town Council	P1.3	Table 8D
P2	Kemsing Parish Council	Parish/Town Council	P2.1	Table 8H
P3	Ringmer Parish Council	Parish/Town Council	P3.1	Table 8H
P4	Arlington Parish Council	Parish/Town Council	P4.1	Table 8H
P5	Berwick Parish Council	Parish/Town Council	P5.1	Table 8H
P6	Sturry Parish Council	Parish/Town Council	P6.1	Table 8H
P7	Burgess Hill Town Council	Parish/Town Council	P7.1	Table 8D
P7	Burgess Hill Town Council	Parish/Town Council	P7.2	Table 8H
P7	Burgess Hill Town Council	Parish/Town Council	P7.3	Table 8B
P8	Downswood Parish Council	Parish/Town Council	P8.1	Table 8D
P8	Downswood Parish Council	Parish/Town Council	P8.2	Table 8H
P8	Downswood Parish Council	Parish/Town Council	P8.3	Table 8H
P8	Downswood Parish Council	Parish/Town Council	P8.4	Table 8H
P9	Uckfield Town Council	Parish/Town Council	P9.1	Table 8H
P9	Uckfield Town Council	Parish/Town Council	P9.2	Table 8H
P9	Uckfield Town Council	Parish/Town Council	P9.3	Table 8H
P9	Uckfield Town Council	Parish/Town Council	P9.4	Table 8H
P9	Uckfield Town Council	Parish/Town Council	P9.5	Table 8D
P10	Ash Parish Council	Parish/Town Council	P10.1	Table 8D

**Appendix I : List of Respondents, Reference Numbers and Location of Detailed Response**

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
P10	Ash Parish Council	Parish/Town Council	P10.2	Table 8D
P10	Ash Parish Council	Parish/Town Council	P10.3	Table 8H
P10	Ash Parish Council	Parish/Town Council	P10.4	Table 8F
P11	Forest Row Parish Council	Parish/Town Council	P11.1	Table 8H
P11	Forest Row Parish Council	Parish/Town Council	P11.2	Table 8D
G1	Inland Waterways Association, Kent & Sussex Branch	Non-Governmental Organisation/Stakeholder Group	G1.1	Table 8B
G1	Inland Waterways Association, Kent & Sussex Branch	Non-Governmental Organisation/Stakeholder Group	G1.2	Table 8H
G1	Inland Waterways Association, Kent & Sussex Branch	Non-Governmental Organisation/Stakeholder Group	G1.3	Table 8H
G1	Inland Waterways Association, Kent & Sussex Branch	Non-Governmental Organisation/Stakeholder Group	G1.4	Table 8H
G2	Canterbury and District Angling Association	Non-Governmental Organisation/Stakeholder Group	G2.1	Table 8H
G3	Ouse and Adur Rivers Trust	Non-Governmental Organisation/Stakeholder Group	G3.1	Table 8B
G3	Ouse and Adur Rivers Trust	Non-Governmental Organisation/Stakeholder Group	G3.2	Table 8H
G3	Ouse and Adur Rivers Trust	Non-Governmental Organisation/Stakeholder Group	G3.3	Table 8H
G3	Ouse and Adur Rivers Trust	Non-Governmental Organisation/Stakeholder Group	G3.4	Table 8H

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
G3	Ouse and Adur Rivers Trust	Non-Governmental Organisation/Stakeholder Group	G3.5	Table 8H
G3	Ouse and Adur Rivers Trust	Non-Governmental Organisation/Stakeholder Group	G3.6	Table 8H
G3	Ouse and Adur Rivers Trust	Non-Governmental Organisation/Stakeholder Group	G3.7	Table 8L
G3	Ouse and Adur Rivers Trust	Non-Governmental Organisation/Stakeholder Group	G3.8	Table 8F
G4	Salmon and Trout Association	Non-Governmental Organisation/Stakeholder Group	G4.1	Table 8B
G4	Salmon and Trout Association	Non-Governmental Organisation/Stakeholder Group	G4.2	Table 8C
G4	Salmon and Trout Association	Non-Governmental Organisation/Stakeholder Group	G4.3	Table 8H
G4	Salmon and Trout Association	Non-Governmental Organisation/Stakeholder Group	G4.4	Table 8H
G5	River Stour (Kent) Internal Drainage Board	Non-Governmental Organisation/Stakeholder Group	G5.1	Table 8D
G5	River Stour (Kent) Internal Drainage Board	Non-Governmental Organisation/Stakeholder Group	G5.2	Table 8H
G5	River Stour (Kent) Internal Drainage Board	Non-Governmental Organisation/Stakeholder Group	G5.3	Table 8H

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
G5	River Stour (Kent) Internal Drainage Board	Non-Governmental Organisation/Stakeholder Group	G5.4	Table 8H
G5	River Stour (Kent) Internal Drainage Board	Non-Governmental Organisation/Stakeholder Group	G5.5	Table 8H
G5	River Stour (Kent) Internal Drainage Board	Non-Governmental Organisation/Stakeholder Group	G5.6	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.1	Table 8A
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.2	Table 8G
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.3	Table 8D
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.4	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.5	Table 8D
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.6	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.7	Table 8J
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.8	Table 8H

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.9	Table 8A
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.10	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.11	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.12	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.13	Table 8A
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.14	Table 8F
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.15	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.16	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.17	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.18	Table 8H
G6	Kent Wildlife Trust	Non-Governmental Organisation/Stakeholder Group	G6.19	Table 8A

**Appendix I : List of Respondents, Reference Numbers and Location of Detailed Response**

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.1	Table 8H
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.2	Table 8H
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.3	Table 8H
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.4	Table 8D
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.5	Table 8L
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.6	Table 8H
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.7	Table 8A
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.8	Table 8H
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.9	Table 8H
G7	Kent Downs AONB Unit	Non-Governmental Organisation/Stakeholder Group	G7.10	Table 8H
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.1	Table 8A

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.2	Table 8A
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.3	Table 8C
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.4	Table 8B
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.5	Table 8H
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.6	Table 8D
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.7	Table 8F
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.8	Table 8A
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.9	Table 8A
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.10	Table 8H
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.11	Table 8C
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.12	Table 8H



Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.13	Table 8D
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.14	Table 8D
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.15	Table 8H
G8	Institution of Civil Engineers South East England Water Panel	Non-Governmental Organisation/Stakeholder Group	G8.16	Table 8A
G9	CPRE Kent	Non-Governmental Organisation/Stakeholder Group	G9.1	Table 8B
G9	CPRE Kent	Non-Governmental Organisation/Stakeholder Group	G9.2	Table 8H
G9	CPRE Kent	Non-Governmental Organisation/Stakeholder Group	G9.3	Table 8H
G9	CPRE Kent	Non-Governmental Organisation/Stakeholder Group	G9.4	Table 8H
G9	CPRE Kent	Non-Governmental Organisation/Stakeholder Group	G9.5	Table 8H
G9	CPRE Kent	Non-Governmental Organisation/Stakeholder Group	G9.6	Table 8F
G9	CPRE Kent	Non-Governmental Organisation/Stakeholder Group	G9.7	Table 8H

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
G9	CPRE Kent	Non-Governmental Organisation/Stakeholder Group	G9.8	Table 8D
R1	Natural England	Regulator and Statutory Consultee	R1.1	Table 8J
R1	Natural England	Regulator and Statutory Consultee	R1.2	Table 8J
R1	Natural England	Regulator and Statutory Consultee	R1.3	Table 8J
R1	Natural England	Regulator and Statutory Consultee	R1.4	Table 8J
R1	Natural England	Regulator and Statutory Consultee	R1.5	Table 8J
R1	Natural England	Regulator and Statutory Consultee	R1.6	Table 8A
R1	Natural England	Regulator and Statutory Consultee	R1.7	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.8	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.9	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.10	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.11	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.12	Table 8H
R1	Natural England	Regulator and Statutory Consultee	R1.13	Table 8H
R1	Natural England	Regulator and Statutory Consultee	R1.14	Table 8H
R1	Natural England	Regulator and Statutory Consultee	R1.15	Table 8H

**Appendix I : List of Respondents, Reference Numbers and Location of Detailed Response**

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
R1	Natural England	Regulator and Statutory Consultee	R1.16	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.17	Table 8H
R1	Natural England	Regulator and Statutory Consultee	R1.18	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.19	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.20	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.21	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.22	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.23	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.24	Table 8I
R1	Natural England	Regulator and Statutory Consultee	R1.25	Table 8A
R1	Natural England	Regulator and Statutory Consultee	R1.26	Table 8B
R1	Natural England	Regulator and Statutory Consultee	R1.27	Table 8H
R1	Natural England	Regulator and Statutory Consultee	R1.28	Table 8F
R1	Natural England	Regulator and Statutory Consultee	R1.29	Table 8A
R1	Natural England	Regulator and Statutory Consultee	R1.30	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.1	Table 8A
R2	Environment Agency	Regulator and Statutory Consultee	R2.2	Table 8A

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
R2	Environment Agency	Regulator and Statutory Consultee	R2.3	Table 8A
R2	Environment Agency	Regulator and Statutory Consultee	R2.4	Table 8D
R2	Environment Agency	Regulator and Statutory Consultee	R2.5	Table 8D
R2	Environment Agency	Regulator and Statutory Consultee	R2.6	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.7	Table 8E
R2	Environment Agency	Regulator and Statutory Consultee	R2.8	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.9	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.10	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.11	Table 8F
R2	Environment Agency	Regulator and Statutory Consultee	R2.12	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.13	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.14	Table 8D
R2	Environment Agency	Regulator and Statutory Consultee	R2.15	Table 8D
R2	Environment Agency	Regulator and Statutory Consultee	R2.16	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.17	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.18a	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.18b	Table 8F

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
R2	Environment Agency	Regulator and Statutory Consultee	R2.19	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.20	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.21	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.22	Table 8D
R2	Environment Agency	Regulator and Statutory Consultee	R2.23	Table 8E
R2	Environment Agency	Regulator and Statutory Consultee	R2.24	Table 8M
R2	Environment Agency	Regulator and Statutory Consultee	R2.25	Table 8F
R2	Environment Agency	Regulator and Statutory Consultee	R2.26a	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.26b	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.27	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.28	Table 8I
R2	Environment Agency	Regulator and Statutory Consultee	R2.29	Table 8I
R2	Environment Agency	Regulator and Statutory Consultee	R2.30a	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.30b	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.30c	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.30d	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.30e	Table 8F

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
R2	Environment Agency	Regulator and Statutory Consultee	R2.30f	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.30g	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.31	Table 8M
R2	Environment Agency	Regulator and Statutory Consultee	R2.32	Table 8D
R2	Environment Agency	Regulator and Statutory Consultee	R2.33	Table 8D
R2	Environment Agency	Regulator and Statutory Consultee	R2.34	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.35	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.36	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.37	Table 8F
R2	Environment Agency	Regulator and Statutory Consultee	R2.38	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.39	Table 8C
R2	Environment Agency	Regulator and Statutory Consultee	R2.40	Table 8A
R2	Environment Agency	Regulator and Statutory Consultee	R2.41	Table 8H
R2	Environment Agency	Regulator and Statutory Consultee	R2.42	Table 8F
R2	Environment Agency	Regulator and Statutory Consultee	R2.43	Table 8E
R2	Environment Agency	Regulator and Statutory Consultee	R2.44	Table 8F
R2	Environment Agency	Regulator and Statutory Consultee	R2.45	Table 8F

**Appendix I : List of Respondents, Reference Numbers and Location of Detailed Response**

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
R2	Environment Agency	Regulator and Statutory Consultee	R2.46	Table 8D
R2	Environment Agency	Regulator and Statutory Consultee	R2.47	Table 8E
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.1	Table 8A
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.2	Table 8B
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.3	Table 8H
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.4	Table 8A
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.5	Table 8A
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.6	Table 8B
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.7	Table 8H
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.8	Table 8D
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.9	Table 8D
R3	Consumer Council for Water	Regulator and Statutory Consultee	R3.10	Table 8H
R4	Ofwat	Regulator and Statutory Consultee	R4.1	Table 8A
R4	Ofwat	Regulator and Statutory Consultee	R4.2	Table 8H
R4	Ofwat	Regulator and Statutory Consultee	R4.3	Table 8E
R4	Ofwat	Regulator and Statutory Consultee	R4.4	Table 8H
R4	Ofwat	Regulator and Statutory Consultee	R4.5	Table 8H

Respondent Reference	Organisation	Type	Comment Ref no.	Location of response in Appendix 2
R4	Ofwat	Regulator and Statutory Consultee	R4.6	Table 8H
R4	Ofwat	Regulator and Statutory Consultee	R4.7	Table 8D
R4	Ofwat	Regulator and Statutory Consultee	R4.8	Table 8D
R4	Ofwat	Regulator and Statutory Consultee	R4.9	Table 8H
R5	English Heritage	Regulator and Statutory Consultee	R5.1	Table 8I
R5	English Heritage	Regulator and Statutory Consultee	R5.2	Table 8I
W1	Albion Water	Water Company	W1.1	Table 8H
W1	Albion Water	Water Company	W1.2	Table 8H
W1	Albion Water	Water Company	W1.3	Table 8D
W1	Albion Water	Water Company	W1.4	Table 8F
W1	Albion Water	Water Company	W1.5	Table 8H
W1	Albion Water	Water Company	W1.6	Table 8F

# Appendix 2 - Table 8A - Overview

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Individual	C1.1	Overview - Support for Our Plan	Approval and support of the plan given the planned housing and population growth.	We welcome this support for our plan.	Support for our plan. No changes to the plan considered necessary.
Individual	C14.1	Overview - Support for Our Plan	Supportive of plan, good ideas.		
Wokingham Borough Council	A1.7	Overview - Support for Our Plan	Overall support of plan.		
Rother District Council	A5.1	Overview - Support for Our Plan	The Council supports the overall aims and objectives of the Plan. It welcomes and supports the constructive engagement with relevant stakeholders. A holistic approach across the south east should be considered to inform future investment needs and strategic direction.		
East Sussex County Council	A10.1	Overview - Support for Our Plan	Supportive of plan and recognise and commend the effort SEW has made in working with other water companies in preparing the WRMP.		
Slaugham Parish Council	P1.1	Overview - Support for Our Plan	Welcome proposals to make better use of existing resources through reduced leakage, water efficiency.		
Institution of Civil Engineers South East England Water Panel	G8.2	Overview - Support for Our Plan	Level of information excellent.		
Natural England	R1.25	Overview - Support for Our Plan	The dWRMP14 is well written using clear language making option selection process transparent.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Environment Agency	R2.2	Overview - Compliance of Our Plan	SEW has presented sufficient evidence in its draft plan to demonstrate compliance with all Directions.	Confirmation that we have complied with all Directions is welcome.	Comment noted. No changes to the plan considered necessary.
Environment Agency	R2.3	Overview - Compliance of Our Plan	Set out main recommendations for dWRMP14. Consider that these issues will ensure final WRMP demonstrates a secure supply of water and protects the environment.	The Environment Agency recommendations are addressed in full within this SOR and we have met with the Environment Agency on several occasions to discuss their comments.	A number of changes to the dWRMP14 have been made in light of the Environment Agency recommendations and consultation responses received from other groups and individuals. These are detailed in this Statement of Response.
South Downs National Park Authority	A4.3	Overview - General	Reminder that water authorities that abstract water from the SDNP area have a statutory duty to have due regard to the purposes of the National Park.	South East Water is aware of its statutory duty to have due regard to the purposes of the National Park, and will continue to work with the SDNPA to ensure this duty is satisfied. This is reflected within the dWRMP14 Section I and also in the option appraisal dossiers available for public viewing at our offices.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Kent Wildlife Trust	G6.1	Overview - General	Recognise serious challenges to maintaining adequate water supply for a growing population in area of high environmental sensitivity which is already experiencing serious water stress.	These general comments are noted and acknowledged.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Institution of Civil Engineers South East England Water Panel	G8.1	Overview - General	Welcome opportunity to comment. Calls for establishment of UK Water Security Taskforce to publish national water resource management road maps and integrated UK water security strategy.	We take water security extremely seriously and will comply with any future government strategies or groups.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Environment Agency	R2.1	Overview - General	Consider that SEW's dWRMP14 demonstrates that it will provide a secure supply of water but it may do that in a way which includes unnecessary impacts on the environment over the next 25 years. Recommend SEW reviews some part of its draft plan. SEW has addressed nearly all recommendations and conclusions made by the planning inspectorate following public inquiry into its draft WRMP submission in 2008. Additional information to be provided to ensure all recommendations met.	<p>We have completed the review of the parts of the plan specifically highlighted by the Environment Agency. Our responses to each of the Environment Agency's recommendations and areas of improvement needed to our plan are addressed in more detail in other sections of this Statement of Response.</p> <p>We take our environmental responsibilities seriously and included consideration of the environmental impacts of possible water resources options as part of our options appraisal process to ensure our Preferred Plan offers the best value option for our customers and the environment. We have worked closely with the Environment Agency throughout the WRMP development process as part of our EFG to ensure we address matters of concern.</p> <p>Each of the Environment Agency's more detailed points from their representation is addressed in the appropriate sections of the Statement of Response.</p>	Clarification provided in the Statement of Response. A number of changes to the dWRMP14 have been made in light of the Environment Agency recommendations and consultation responses received from other groups and individuals. These are detailed in this Statement of Response.
Consumer Council for Water	R3.1	Overview - General	Welcome opportunity to comment on dWRMP14. CCWater expect that dWRMPs: reflect customers' views and priorities; are based on good customer and stakeholder engagement; have considered all of the relevant issues; and, are clearly communicated.	These comments are noted, and are pleasing given the extensive level of engagement with our stakeholders and customers we have completed to inform our WRMP development process, as referred to in Sections 1 and 2 of the dWRMP14.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Ofwat	R4.1	Overview - General	Views based on a high level review of the processes described in the plan against the requirements of the Water Resources Planning Guideline. Comments without prejudice to any subsequent decisions in connection with the business plan.	These comments are noted.	Comments noted. No changes to the plan considered necessary.
Surrey County Council	A8.9	Overview - Format of dWRMPs	Would like all companies to provide same data in same format, year on year and in a consistent manner across all WRMPs to ensure consultation is transparent and accessible.	<p>As set out in dWRMP14 section 1.3, we are required to prepare our WRMP in accordance with guidelines prepared by the Environment Agency, Ofwat, Defra and the Welsh Government. These requirements apply to all water companies and set out what data is to be included, however these guidelines can be interpreted slightly differently and there is some flexibility as to how information is presented. The WRP tables however do provide a consistent format of data across companies and South East Water has complied with the WRP table requirements.</p> <p>We have endeavoured to provide all information in our plan in a manner that is both transparent and accessible but appreciate the difficulty for consultees who have to look at several plans.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA /HRA
Kent Wildlife Trust	G6.9	Overview – Challenges and Opportunities	Locally important but undesignated sites such as Local Wildlife Sites/Sites of Importance for Nature Conservation not recognised as part of environmental context (Figure 1.7). No mention is made of the need to protect the biodiversity of these sites - like to see recognition within the WRMP of county Local Wildlife Sites/SINCs as a natural resource in need of protection.	<p>Locally designated sites were taken into account during the optioneering exercise.</p> <p>Full details of the local designated sites in relation to each feasible option considered are shown in the option appraisal dossiers, which were made available at our offices during the formal dWRMPI4 consultation process.</p> <p>We endeavoured to provide information that is both transparent and accessible but appreciate the difficulty for consultees who have to look at several sources of information.</p> <p>The scale of Figure 1.7 is too small to display all locally designated sites, but we have now added text clarification that the location of these were taken into account during the optioneering process when considering the potential options available.</p>	Clarification provided in the Statement of Response. Some additional text has been added to Section 7 Optioneering of the rWRMPI4 to clarify the position.
Natural England	RI.6	Overview - Challenges and Opportunities	Minor errors in the identification of designated sites within the main dWRMPI4 and in tables within the SEA. Site Vulnerability Issues Table A.1 to the HRA should be updated. These are minor errors that have not affected accuracy of the HRA or SEA.	Corrections have been made to designations referenced in the rWRMPI4 and tables in SEA and HRA as directed including updating of the site Vulnerability issues in Table A.1.	Changes have been made to designated site names and Table A.1 in the HRA, the SEA and rWRMPI4 Section 1.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Institution of Civil Engineers South East England Water Panel	G8.16	Overview - Linkages to Other Programmes - Business Plan	Believe that "stop-go" 5 yearly cycle of investment planning has a significant and negative impact on the efficiency of the water industry's capital investment.	<p>This is more a matter to be addressed by the business plan and regulatory process rather than the water resources management plan process, but South East Water has good experience of the 5 yearly cycle process.</p> <p>For the business plan proposal being submitted to the economic regulator Ofwat in December 2013, we will consider the opportunity to better distribute evenly the profiles of expenditure required to meet our levels of service to customers in each year of the 2015 to 2020 period. This should minimise as far as is achievable some of the stop go impacts that might arise of the 5 yearly cycle.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Kent Wildlife Trust	G6.13	Overview - Linkages to Other Programmes - Catchment Management	Recommend SEW works with partners on schemes to improve the rates of recharge by implementing changes in land use that retain surface water long enough for it to be absorbed rather than running out through efficient drainage systems.	<p>We have included funding in our plan to implement our National Environment Programme (NEP) which includes catchment management investigations driven by the requirements of Water Framework Directive.</p> <p>Further details are included in rWRMP14 Appendix 9. The overarching purpose of these investigations will be to gain an understanding of the extent of contaminants within catchment upstream of our abstractions and provide mitigation measures and recommendations which could be implemented within the catchment to reduce contaminants and provide long-term cost-savings and resilience at our treatment works. However, by tackling these matters we hope to identify opportunities to retain more water in catchments and improve recharge.</p> <p>All investigations will be undertaken where possible in partnership with various stakeholders. Our approach will follow the key stages outlined in the UKWIR guidance: Quantifying the Benefits of Water Quality Catchment Management Initiatives: A Benefits Assessment Framework (2012). The approach also takes account of the wider ecosystem and financial benefits of catchment management. This approach is recommended in the EA Water Quality Planning: identifying measures for the PR14 NEP (May 2013) with respect to determining the cost effectiveness of the proposals.</p>	Clarification provided in the Statement of Response. We have included more detail regarding the NEP for AMP6 in rWRMP14 Appendix 9.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
South Downs National Park Authority	A4.6	Overview - Linkages to Other Programmes - Catchment Management	Queried why catchment management measures do not feature in WRMP and cites example from Southern Water dWRMP14 at Brighton to address rising nitrate levels. Queries whether this approach is appropriate for abstractions from the rivers Ouse and Cuckmere? Are CMS included in the Business Plan? If so, there should be a link to WRMP. If CMS deemed not to be relevant then request a robust justification for omitting these from the final WRMP. Request SEW make a clear commitment to partnership working with SDNPA to deliver dWRMP14 actions through CMS approach.	<p>Catchment management is included within our AMP6 National Environment Programme (NEP), a statutory programme that helps to deliver a number of our environmental obligations. This programme has been costed and included in our Business Plan. This plan includes catchment management investigations driven by the requirements of Water Framework Directive.</p> <p>Our current draft programme covers investigations into six surface water catchments and eight ground water catchments (which are being undertaken to investigate specific chemical contaminants and to investigate whether a catchment management solution is possible in each case).</p> <p>Our draft NEP currently covers surface water investigations on the rivers Ouse, Cuckmere, Eastern Rother and Wallers Haven. Joint surface water investigations have been submitted for the rivers Thames and Medway.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary, however we have included more detail regarding the NEP for AMP6 in rWRMP14 Appendix 9.
Kent Wildlife Trust	G6.19	Overview - Linkages to Other Programmes - Catchment Management	Dismayed that catchment management options not in preferred plan. Benefits of this approach to long term sustainability of water resources are recognised and there are synergies with other options. Partnership working on a catchment based approach is key to addressing the challenges to maintaining adequate water supply for growing population in an area of high environmental sensitivity which is already experiencing serious water stress.	<p>The aim of surface water investigations is to gain an understanding of the extent of contaminants within catchment upstream of our abstractions and provide mitigation measures and recommendations which could be implemented within the catchment to reduce contaminants and provide long-term cost-savings and resilience at our treatment works.</p> <p>The approach will follow the key stages outlined in the UKWIR guidance: Quantifying the Benefits of Water Quality Catchment Management Initiatives: A Benefits Assessment Framework (2012). The approach also takes account of the wider ecosystem and financial benefits of catchment management. This approach is recommended in the EA Water Quality Planning: identifying measures for the PR14 NEP (May 2013) with respect to determining the cost effectiveness of the proposals.</p>	

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent Downs AONB Unit	G7.7	Overview - Linkages to Other Programmes - Catchment Management	No mention of ecosystem approach - a number of successful pilot schemes. Involve working with landowners and managers to pilot land management techniques that can improve water quality and reduce run-off/silt problems. Subsidies to land managers can also prove to be cost effective. From AONB point of view, can lead to improvements in landscape and biodiversity. Wish to see pilots set up within first 5 years of asset management period so long term impacts can be assessed well within 25 year time frame.	See previous response	Clarification provided in the Statement of Response. No changes to the plan considered necessary, however we have included more detail regarding the NEP for AMP6 in rWRMP14 Appendix 9.
Natural England	RI.29	Overview - Linkages to Other Programmes - Catchment Management	Catchment Schemes - Welcome commitment to support catchment management scheme for the Adur and Ouse. WRMP should be updated to include specific reference to the catchment schemes that are likely to come forward from the Environment Agency National Environment Programme. Schemes may contribute to improved water quality, reduce diffuse pollution and improve resilience. Hope Business Plan will reflect the company's stated commitment to catchment schemes.		
Consumer Council for Water	R3.4	Overview - Linkages to Other Programmes - Catchment Management	Catchment Management is not mentioned in the non-technical summary.		
Consumer Council for Water	R3.5	Overview - Linkages to Other Programmes - Catchment Management	Not clear how plan will meet the requirements of the National Environment Programme.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
South Downs National Park Authority	A4.7	Overview - Maintaining Levels of Service	Section 1.53: SDNPA support SEW environmental level of service but wish to see planning to a greater magnitude-less frequent return period and build greater resilience into the WRMP.	We are pleased to receive support for our planned levels of service. Ahead of our next plan due for consultation 2018/19 we will review the WRMP Guideline available at that time and explore further opportunities to build further levels of resilience into our future plans. We plan to involve and engage with the SDNPA and other stakeholders during those further investigations, so that we get a good understanding of the acceptability of proposals we might wish to consult on for adoption in our next plan.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Kent County Council	A14.8	Overview - Maintaining Levels of Service	The value of reducing Levels of Service for Drought Orders is not discussed. No assessment of cost implications of moving towards a 1 in 20 year level of service for drought orders is presented (to bring dWRMP14 in line with other water companies). No mention of expected frequency of more severe usage restrictions such as standpipes.	Through specific willingness to pay research, our customers have shown their support for maintaining current levels of service that ensure they should only experience temporary water use restrictions once every ten years.  Regarding the level of service for drought orders for non-essential use, South East Water has been clear to explain its level of service as being 1 in 40 years. We are aware that other companies have expressed their non-essential use frequency slightly differently, describing them as being no more frequent than 1 in 20, but also not strictly saying they are less frequent than 1 in 40 years either.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Institution of Civil Engineers South East England Water Panel	G8.9	Overview - Maintaining Levels of Service	SEW's proposed levels of service for hosepipe bans are lower than those generally accepted outside South East. Given the need to balance levels of service with customer bills and resources in this area, this may be acceptable.	The company considers the use of standpipes to manage drought not to be acceptable to customers, and in our drought plan we do not plan for standpipes as part of the management of severe drought events.	

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Environment Agency	R2.40	Overview - Maintaining Levels of Service	Minor Issue (10) Levels of Service.The company should provide actual levels of service for its baseline and planning scenarios, in accordance with the WRPG.We would accept a simple discussion of how actual levels of service may vary across the planning period as the plan is implemented.	<p>We have provided more clarification to the Environment Agency on our approach to levels of service, and sensitivity testing around levels of service are included in rWRMP14 Appendix 9B.</p> <p>Our approach includes sensitivity testing and customer testing of adopted, planned and reference levels of service which explore the impact of various alternative assumptions on our preferred plan.We conclude that our planned level of service satisfies our customer expectations, our regulatory requirements and meets the best value cost for the plan.</p> <p>In accordance with the August 2013 update to the WRMP Guideline, we have added a table in Section 3 of rWRMP14 to explain how levels of service affect baseline deployable output</p>	We have included Appendix 9B in our rWRMP14.We have included a new table in section 3 of our rWRMP14 to explain levels of service impacts on baseline deployable output.
Individual	C22.1	Overview - Working with Other Water companies	Response to SEW but most comments also apply to Southern Water and Affinity. Require co-operative action to benefit region as a whole.	We welcome this support for our approach.We will continue to support and take an active role within the WRSE Group, and assist with the Group's objectives to agree solutions and approaches that benefit the region as a whole.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
South Downs National Park Authority	A4.16	Overview - Working with Other Water Companies	Support principle aims of WRSE to develop a regional water resources strategy.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Institution of Civil Engineers South East England Water Panel	G8.8	Overview - Working with Other Water Companies	<p>The dWRMP14 does not address any possible impacts of competition on SEW's water resource management.</p> <p>Reservations as to possible impacts and would like this discussed in the plan.</p>	<p>South East Water's water resources management has considered some of the possible competition impacts on it, in several ways, and in accordance with the plan guidelines:</p> <ol style="list-style-type: none"> <li>1. During the development of the plan we published a statement of our water need and availability across the 25 year period, to allow third parties to understand where opportunities existed for them to offer competing options (supply side options and demand side options) to companies for consideration in their options appraisal and selection processes.</li> <li>2. South East Water wrote to the major private water abstraction licence holders in its area to invite them to offer competing options to the Company for supply.</li> <li>3. The Company participated in the Water Resources in the South East regional modelling that successfully included many water transfer, and water trading options between water companies. Invites were extended to all the water supply licensees in the UK to offer up competing options to the modelling.</li> </ol> <p>In this regard, competition to supply water was considered to a reasonable extent. In terms of the possible impacts of competition on the company's demand forecast - the recent changes that lowered the volume threshold for non-households to be able to switch supplier overall had a very small impact on South East Water due to a large proportion of our non-household customers water usage being well below the threshold set and more comparable with domestic water usage. We consider it reasonable to assume competition will have only a fairly minor impact on our long term planning at this stage.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.



# Appendix 2 - Table 8B - Engagement

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
South Downs National Park Authority	A4.2	Engagement - Support	Appreciated opportunity to be part of EFG and influence the optioneering process - which has been very helpful.	We welcome this positive support on our engagement with customers and key stakeholders in preparing dWRMPI 4. The engagement programme was developed as a result of the lessons learnt from the WRMP09 planning and consultation process, and the subsequent Public Inquiry. At its core was our commitment to have much earlier, open and transparent dialogue with regulators and key stakeholders on the range of demand and supply side options available to us, and before publication of the draft plan; and then to test fully with customers both elements of the dWRMPI 4, and the overall package, using robust survey and research techniques, to support the formal statutory consultation.	No changes to the plan considered necessary.
Lewes District Council	A7.1	Engagement - Support	Very supportive of EFG and SEW's approach to ensure transparency is commended. The opportunity to scrutinise and challenge SEW's work has given added confidence that the WRMP will be cost effective, environmentally sustainable and resilient to risk.	In documenting the WRMP process, we sought to provide material that is accessible, backed up with the technical detail for those who need it.	
Hart District Council	A11.1	Engagement - Support	Commends SEW on documentation and its accessibility to lay person.		
Kent County Council	A14.1	Engagement - Support	The County Council welcomes the improved approach taken by SEW in developing the dWRMPI 4. Appreciate opportunity to be part of EFG. Support evidence of improved regional collaboration and the role played by SEW.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Inland Waterways Association Kent & Sussex Branch	G1.1	Engagement - Support	Participated in process as part of the EFG and has been fully informed of all options for water supply and demand. SEW has been fully transparent.	We welcome this positive support on our engagement with customers and key stakeholders in preparing dWRMP14. The engagement programme was developed as a result of the lessons learnt from the WRMP09 planning and consultation process, and the subsequent Public Inquiry. At its core was our commitment to have much earlier, open and transparent dialogue with regulators and key stakeholders on the range of demand and supply side options available to us, and before publication of the draft plan; and then to test fully with customers both elements of the dWRMP14, and the overall package, using robust survey and research techniques, to support the formal statutory consultation.	No changes to the plan considered necessary.
Ouse and Adur Rivers Trust	G3.1	Engagement - Support	Commend company on EFG initiative and for taking the opinions of stakeholders on board.	In documenting the WRMP process, we sought to provide material that is accessible, backed up with the technical detail for those who need it.	
Salmon and Trout Association	G4.1	Engagement - Support	SEW is to be congratulated on the manner in which it involved stakeholders in a genuine and extensive consultation process as part of its resource planning strategy.		
Institution of Civil Engineers South East England Water Panel	G8.4	Engagement - Support	Made significant efforts in engaging with stakeholders, in particular establishment of the EFG. Believe SEW has struck reasonable balance between levels of service and controlling bills.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
CPRE Kent	G9.1	Engagement - Support	EFG provided unique opportunity for a wide range of groups to contribute to formation of plan. Company is commended for fostering a positive and constructive approach for developing a strategy that would measure up to multiple challenges and uncertainties facing the company in its endeavours to maintain supply whilst improving environmental quality.	<p>We welcome this positive support on our engagement with customers and key stakeholders in preparing dWRMP14. The engagement programme was developed as a result of the lessons learnt from the WRMP09 planning and consultation process, and the subsequent Public Inquiry. At its core was our commitment to have much earlier, open and transparent dialogue with regulators and key stakeholders on the range of demand and supply side options available to us, and before publication of the draft plan; and then to test fully with customers both elements of the dWRMP14, and the overall package, using robust survey and research techniques, to support the formal statutory consultation.</p> <p>In documenting the WRMP process, we sought to provide material that is accessible, backed up with the technical detail for those who need it.</p>	No changes to the plan considered necessary.
Natural England	RI.26	Engagement - Support	Use of stakeholder forums (in particular the EFG) throughout process is considered to be example of best practice engagement.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Consumer Council for Water	R3.2	Engagement - Support	<p>SEW has conducted extensive customer research and stakeholder engagement for the preparation of its dWRMP14. EFG has given a wide range of bodies and local groups opportunity of close involvement in the key stages of the development of the dWRMP14. Company has devised a comprehensive engagement strategy. Company's website has been used to good effect. Produced customer friendly, non-technical summary. Plan explores a variety of options and these are presented clearly in the non-technical summary. It also shares information on the comparative costs of each option. Pleased to see inclusion of the WRSE recommendations. Demonstrates firm commitment from SEW to work collaboratively with its neighbouring water and sewerage companies in the years to come.</p>	<p>We welcome this positive support on our engagement with customers and key stakeholders in preparing dWRMP14. The engagement programme was developed as a result of the lessons learnt from the WRMP09 planning and consultation process, and the subsequent Public Inquiry. At its core was our commitment to have much earlier, open and transparent dialogue with regulators and key stakeholders on the range of demand and supply side options available to us, and before publication of the draft plan; and then to test fully with customers both elements of the dWRMP14, and the overall package, using robust survey and research techniques, to support the formal statutory consultation.</p> <p>In documenting the WRMP process, we sought to provide material that is accessible, backed up with the technical detail for those who need it.</p>	No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Individuals	C9.1	Engagement - Points of Clarification	Suggests that the plan is poorly advertised on SEW's website and that this has been done on purpose to minimise customer criticism.	We have carried out an extensive engagement process through the development of our WRMP14 as detailed in the dWRMP14 Section 2. Every effort was made to publicise the WRMP consultation on our website including signposting on the front page and the development of short summary videos and a non-technical summary.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Individuals	C11.3	Engagement - Points of Clarification	Asks whether Thurnham Parish Council have been consulted.	We can confirm that Thurnham Parish Council has been consulted.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Burgess Hill Town Council	P7.3	Engagement - Points of Clarification	Difficult to see difference between the Clear Water and WRMP consultation.	<p>The draft Water Resources Management Plan is a statutory plan that sets out how companies will meet the supply demand balance over a 25-year period. The focus of that plan is entirely on water demand, supply and resource management.</p> <p>The company's Clear Water document is not a statutory plan, but a business-wide strategy document that is produced every five years; this aims to set out the future direction of the business, beyond just its core purpose of supplying drinking water; to capture how it will deliver excellent customer service, while remaining an environmentally and financially sustainable business.</p> <p>As ensuring a reliable water supply for the future is core to our business, the two documents are fundamentally and unavoidably linked.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Consumer Council for Water	R3.6	Engagement - Points of Clarification	<p>Pleased that extensive research and engagement is mentioned in the non-technical summary. Would have been helpful to see a summary table of the key outputs from these activities and how customer and stakeholder priorities were linked to options in the plan. Having engaged with household and non-household customers it would have been interesting to see any differences or similarities in opinion highlighted. No specific reference to the agricultural sector and if the company intends to engage with this sector going forward to deliver on environmental commitments. Plan appears to be designed to address the supply/demand elements but makes no clear statements in relation to bill impacts.</p>	<p>We are planning to produce an updated non-technical summary (NTS) once we have the final approved plan. We will include a summary table of the key outputs from customer and stakeholder research and engagement in the final NTS.</p> <p>In the revised plan we have included a new Appendix 9 to set out the National Environment Programme (NEP) we have been asked by the Environment Agency to deliver during AMP6. Catchment Management investigations form a key component of the NEP during AMP6, and those investigations will involve a high level of engagement and working with the agricultural sector.</p>	<p>Clarification provided in the Statement of Response. No changes to the plan considered necessary, however the rWRMPI4 Section 9 provides details of the NEP and engagement with the agricultural sector going forward.</p> <p>In addition to this, an updated non-technical summary will be prepared to support the fWRMPI4 that will include a table setting out key outputs from customer and stakeholder research.</p>





# Appendix 2 - Table 8C - Supply Forecast

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Environment Agency	R2.20	Supply Forecast - Bulk Supplies	Improvement 8 - Existing Transfers Some inconsistencies in the forecast values of transfers from Southern Water. Company should clarify the reasons for differences in DO and agree consistent figure. Present further consistent information about existing internal transfers and their utilisation for baseline and further final plans.	Following discussions with Southern Water we have clarified the transfers and bulk supply volumes available to the company and these are now included in the rWRMPI4. In addition, the output of the shared supply of the River Medway Scheme has been agreed and the plan updated accordingly.	Clarification provided in the Statement of Response. Updated text and made minor changes to values included in Section 3 of the rWRMPI4.
Salmon and Trout Association	G4.2	Supply Forecast - Climate Change	Concerned available supply forecast might be overstated because not taking full account of climate change extremes. Resources are at risk of proving inadequate or unavailable at times, and the company should draw up contingency for rapid response development should the situation arise.	Climate change represents a challenge to future water resources in our region. We have taken account of it in accordance with Government requirements as per the WRMP Guideline and included uncertainty of more extreme events in target headroom. The company clearly lays out what it would do in the situation of insufficient resources to meet demand in its publically available Drought Plan.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.18a	Supply Forecast - Climate Change	Improvement 6a - Climate Change - Supply Should follow water resources planning guideline (section 3.3.6) and provide an assessment of the impact of climate change in the assessment of low and medium vulnerability water resource zones.	As far as practicable we have followed the Water Resources planning guideline Section 3.3.6 and provided an assessment of the impact of climate change on the assessment of low and medium vulnerability water resource zones.  The work on groundwater DOs was completed based on some of our modelling plus hydrogeological interpretation. The simplified approach to estimating groundwater DO impacts in zones 6-8 was adopted due to a lack of data for the former Mid Kent zones. We felt this was a more robust approach (using the average of many models rather than one model).	The Basic Vulnerability Assessment Report (prepared by HR Wallingford June 2012) is included in the rWRMP14 as an additional part of Appendix 3D.
South Downs National Park Authority	A4.8	Supply Forecast - Deployable Output	Section 3.14: concern that DO assessment only considers historic droughts back to 1920's and queries whether or not application of stochastically generated approach is appropriate? Cites inconsistency between approaches used by water companies who supply SDNP area.	Our DO assessments are based on the WRMP Guideline. Since then further work has been undertaken. We are aware that Southern Water has adopted a stochastic approach to DO assessments. For the River Medway Scheme, which is a shared resource with Southern Water, we have agreed to adopt its new DO assessments in our plan.  Our current view is that our DO assessments are consistent with the levels of service we have, however we will work with the regulators and consider a stochastic approach for WRMP19.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Environment Agency	R2.16	Supply Forecast - Deployable Output	<p>Improvement 4 - Deployable output</p> <p>Explain and justify reasoning for choosing a 1 in 50 year drought severity for estimating DO. Should demonstrate and explain how current DO assessment relates to the worst drought event in the historical record. Outline alternative assessment that might be necessary as a consequence of using worst drought event on record. Not clear what impact any levels of service have had on calculation of DO. Demonstrate how levels of service affect its DO - assess baseline deployable output for the following levels of service scenarios of no restrictions, company planned and reference levels of service. These three scenarios should be presented in the plan. Demonstrate how the difference between a restricted and unrestricted demand has influenced the outcomes or, explain why this cannot be done. This is to help identify where this is scope for the company to vary its level of service to help address any deficits, or to demonstrate the cost implications of an enhanced level of service for customers. Presented little evidence in its assessment of conjunctive use opportunities when determining its DO. Should commit to further assessment before its next draft plan.</p>	<p>For surface water DOs the effect of demand restrictions has been assessed for the existing sources in addition to the base deployable output assessment. However the deployable output of each option which was an extension to an existing scheme was assessed assuming unrestricted demand on the existing assets.</p> <p>Groundwater DOs were only assessed under unrestricted demand.</p> <p>We have provided further commentary on Levels of Service in Section 3 of the rWRMPI4.</p> <p>We have committed to further assessment before our next plan in Section 9 of the rWRMPI4.</p>	<p>We have provided further detail on Levels of Service impacts on DO in Section 3 of the rWRMPI4.</p> <p>We have included a commitment to further assessment before our next plan in Section 9 of the rWRMPI4.</p>

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.17	Supply Forecast - Deployable Output	Improvement 5 - River Medway Scheme Used Southern Water assessment of critical drought for this source. Before preparing the next draft WRMP, expect all source assessments are aligned to the critical drought for the company, taking account of system constraints. Should also make any subsequent changes to the next drought management plan. Before next WRMP, company should consider re-assessing deployable output relative to a wider range of different drought severities and present the results with and without the influence of assumed demand restrictions and other drought management measures.	Since the dWRMP14 we have carried out sensitivity testing for different drought severities and these are included in rWRMP14 Appendix 9. We have also discussed and agreed the River Medway Scheme deployable outputs with Southern Water.  Our Drought Plan has been recently published but will be reviewed during AMP6 at which point the updates from the WRMP14 will be included.	Additional text has been added to rWRMP14 Appendix 9.
Environment Agency	R2.34	Supply Forecast - Deployable Output	Minor Issue (4) Changes in DO - impact on other components of supply. The company should take into account the changes in DO if they have significant effects on other components.	Changes and impacts of changes to DO components have been included in the rWRMP14 for instance in outage and target headroom. Unfortunately some late changes (such as revisions to the RMS) were not incorporated in dWRMP14 as there was insufficient time; however overall these discrepancies were not material and have been corrected in rWRMP14.	Updates made to rWRMP14 Appendix 3 and Appendix 4.
Environment Agency	R2.38	Supply Forecast - Deployable Output	Minor Issue (8) Deployable Output. Appendix 3 - The company should correct the title of Table 4 and make it clearer that the decreases relate to changes of DO for surface and groundwater sources.	Title to Table 4 corrected in the rWRMP14 Appendix 3.	Updates made to rWRMP14 Appendix 3.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.39	Supply Forecast - Deployable Output	Minor Issue (9) Deployable output - confidence ratings. Appendix 3A - for clarity, the company should add the confidence ratings in the tables.	Confidence ratings added to the tables in Appendix 3A of the rWRMP14.	Updates made to rWRMP14 Appendix 3.
South Downs National Park Authority	A4.9	Supply Forecast - Outage	Section 3.28 and Appendix 3.1: Concerned that nitrate pollution risk may have been underestimated for associated groundwater abstractions. Request further information in this respect to increase confidence in outage calculations.	<p>Nitrate pollution is not a significant issue or challenge across our sources.</p> <p>Generally nitrate pollution shows long term trends which we can identify from our routine water quality monitoring. This allows us to predict if nitrate levels are increasing and when we may need to intervene to include additional treatment. As a result increasing nitrate levels rarely result in outage, but require investment in either nitrate removal or catchment management. Both issues can be identified in the company's business plan and are funded as part of the water quality programme rather than through the water resources management plan.</p> <p>In the event that nitrate removal is required via a treatment process, there will be a reduction in DO. This is a long term issue and is included in target headroom rather than outage. SEW would welcome joint working on catchment management with SDNPA to help reduce nitrates.</p>	We are committing to undertaking further work on outage to consider options to reduce risk at sites where it is highest – see Section 9.67 of the rWRMP14.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Environment Agency	R2.6	Supply Forecast - Outage	Recommendation 3: Outage Outage values are high compared to WRMP09 and annual returns. Values are high compared to other companies in south east. Company not provided information relating to outage type and source works, making it difficult to determine which categories of outage are the most significant and which sources are impacted. Company not considered options to reduce outages in options appraisal of plan. Recommend the company provides further detail about assumptions used in deriving the outage allowances included in final plan. Include summary of outage by type and source works. Show how the outage values could vary if applied different assumptions. Given high outage values, company should explain the steps already taken, and steps it plans to take in the future.	An updated Outage Report has been completed to address these issues and is included in rWRMPI4 Appendix 3. Overall, there is no change to the published outage figures in the rWRMPI4.	Updated report on Outage in Appendix 3. Section 9.67 includes a commitment to undertake further work on outage in AMP6.
Environment Agency	R2.35	Supply Forecast - Outage	Minor Issue (5) Outage - Appendix 3c: The company should clarify which percentile has been used and justify its choice. The company should underpin its assumption by analysing outage records.	An updated Outage Report has been completed to address these issues and is included in rWRMPI4 Appendix 3. Overall, there is no change to the published outage figures in the rWRMPI4.	Updated report on Outage in Appendix 3. Section 9.67 includes a commitment to undertake further work on outage in AMP6.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.21	Supply Forecast - Process losses	Improvement 9 - Process Losses State clearly adjustments made by source and resource zone and ensure consistent reporting. Ensure no double counting for process losses included in DO. Further opportunities to reduce losses sought before next draft plan.	<p>An updated Process Losses Report addresses these issues and provides clarification on the methodology. This report is included in rWRMP14 Appendix 3. Overall there is no change to the published process loss figures in the rWRMP14.</p> <p>As part of the review of process losses during AMP6 (period 2015 to 2020), we will include a study to look at opportunities to reduce these losses and develop options in the next plan accordingly.</p>	Updated Process Losses Report is included in rWRMP14 Appendix 3.
Environment Agency	R2.36	Supply Forecast - Process losses	Minor Issue (6) Process Loss Methodology - The company should state what it intends to do to improve its process losses assessment, both at study sites and at other sites where an average percentage has been applied. Further work should be implemented to provide better information before preparation of the next draft WRMP.	We agree to undertake further work on the assessment of process losses prior to the next draft WRMP. A statement has been inserted into rWRMP14 Appendix 3 to reflect this.	Updates made to rWRMP14 Appendix 3 and updated report included.
Institution of Civil Engineers South East England Water Panel	G8.3	Supply Forecast - River Medway Scheme	No explanation of Southern Water's current licence application for increasing yield.	<p>During AMP5 Southern Water has progressed a licence variation to the River Medway Scheme that will increase the yield of the scheme by 5 MI/d in 2015. Following agreement of our financial contribution to the scheme South East Water will be entitled to 25% of the additional yield i.e. 1.25MI/d at average and 1.6MI/d at peak.</p> <p>We have included additional text on the licence application and yield of the River Medway Scheme with Southern Water which and this is included in rWRMP14 Section 3 and Section 9.</p>	Clarification text added to rWRMP14 Section 3 and Section 9.



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Institution of Civil Engineers South East England Water Panel	G8.11	Supply Forecast - Sustainability Reductions	Incorporated sustainability reductions - given pressures on water resources in South East and possible further reductions, encourage Defra to ensure only those reductions that are rigorously supported with good quality data are pursued.	<p>Investigations into the sustainability of current licensed abstractions are included within our statutory National Environment Programme (NEP). This programme covers a various statutory environmental obligations of which one element is restoring sustainable abstractions (RSA). This programme is developed by our environmental regulators, (Environment Agency and Natural England) and approved by Defra.</p> <p>All abstraction investigations are science led covering many scientific disciplines including geomorphology, hydrology, ecology and land use. Where an abstraction has a detrimental impact on the environment, investigations consider whether this impact could be mitigated or offset in some way, for example we evaluate many measures including catchment management, hands off flows, environmental enhancements, alternative methods of operating licences etc. In some cases the only alternative is the cessation of an abstraction or implementation of sustainability reductions. This decision is taken as a last resort, and only when there is robust and conclusive science supporting this conclusion.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Environment Agency	R2.19	Supply Forecast - Sustainability Reductions	<p>Improvement 7 - Wingham and Little Stour sustainability reduction</p> <p>Sustainability change for Little Stour and Wingham should be consistent with NEP phase 3 submission. Should be defined as a sustainability change of zero, with habitat enhancement as solution. Based on very significant negative cost benefit which should be revisited as part of the disproportionate cost assessment in time for 2nd cycle river basin plan.</p>	We have been advised that the sustainability reduction previously proposed at Kingston (Wingham and Little Stour catchments) is no longer required and consequently the NEP scheme has been modified. This is reflected in the rWRMPI4.	The text in rWRMPI4 Section 3 has been updated and the plan has been changed to account for this reduction no longer being required.



# Appendix 2 - Table 8D - Demand Forecast

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Consumer Council for Water	R3.9	Demand Forecast - General	SEW rightly identify the need to establish new water supplies and move away from the current reliance on groundwater. However, there appears to be a number of risks and uncertainties in medium to longer term in relation to population growth, climate change and the result of its demand management activities. It will therefore be important that the company continues to refine its modelling and understanding of its assets. Where relying on third party population/housing forecasts we would expect this to be updated if more up to date or more reliable information comes available.	Since the publication of the dWRMP14 Experian have provided us with new populations and housing forecasts based on the latest census (Census 2011). We have updated our Demand Forecast to account for these changes in rWRMP14 Section 4.  We have also updated our target headroom calculation outlined in dWRMP14 section 5.5 to account for uncertainty in the demand forecast.	The population and housing forecasts (rWRMP14 Section 4) and target headroom calculations (rWRMP14 Section 5) have been updated.
Ofwat	R4.7	Demand Forecast - General	Appendix 4 (page 3) states that the final planning demand forecast is presented within sections 9 and 10 of the dWRMP14 as part of the development of the preferred plan. Could not locate information in the main report.	A Table showing the final demand forecast has been added to rWRMP14 Section 9.	A Table showing the final demand forecast has been added to rWRMP14 Section 9.
South Downs National Park Authority	R4.12	Demand Forecast - Baseline Leakage	Section 4.54: support continued reduction in leakage but unclear how this links to SELL? Would like to see historic leakage levels and continued reductions over the planning period compared directly to SELL. Section 4.55: unclear how environmental benefits of leakage reduction have been linked to SELL and request further information. Has the 2012 report on "Review of the calculation of sustainable economic level of leakage and its integration with WRMP planning" been considered?	The latest guideline on SELL (October 2012) was not published at the time we undertook our analysis. Nevertheless our approach to economic modelling takes into account environmental and social costs and benefits and incorporates the best available information and methodologies.  In agreement with the Environment Agency we have committed to updating our leakage and SELL assessment using the latest guidelines (October 2012) for WRMP19.	Additional text has been added to rWRMP14 Section 4 and Section 9.67 to confirm our commitment to further work in AMP6.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.22	Demand Forecast - Baseline Leakage	Improvement 10 - Leakage Expect as a minimum that the company includes recommendations of the Review of Sustainable Economic Level of Leakage (SELL) report October 2012. No reference to SELL report. Need to confirm whether will include recommendations and if not, produce a schedule for implementation. Accurately estimating background leakage is an important element of SELL calculation. Calculation should be revised in accordance with best practice. Before next plan, company should recalculate SELL based on updated background leakage figure. Expect all companies to have consulted their customers on this issue. If not proposed to do so, company should set out its reasons for not doing so. Company should explain why unmeasured supply pipe leakage is rising over the 2020-40 period or review it.	<p>The latest guideline on SELL (October 2012) was not published at the time we undertook our analysis. Nevertheless our approach to economic modelling takes into account environmental and social costs and benefits and incorporates the best available information and methodologies.</p> <p>We have committed to updating our leakage and SELL assessment using the latest guidelines for WRMP19 and refer to this in our rWRMP14.</p> <p>We will produce a revised leakage strategy based on the latest guidance prior to our next WRMP.</p> <p>We have met with the Environment Agency and resolved misunderstanding on supply pipe leakage.</p>	Additional text has been added to rWRMP14 section 4 to clarify this. rWRMP14 Section 9.67 includes a commitment to further work in AMP6.
Environment Agency	R2.33	Demand Forecast - Climate Change	Minor Issue (3) Impact of climate change on demand - The company should use the regression model for WRZ 6 to 8 to check if the figures are in the same range as for WRZ 1 to 5. The outcomes of the study of agricultural consumption should be included in the WRMP. The company should amend the tables for the last 5 years with interpolated figures.	<p>Climate change has been included within the demand forecast in line with guidance, and we are committed to carrying out further analysis on non-household demand, and the potential impact of climate change, in preparation for the next WRMP.</p> <p>We have met with the Environment Agency to discuss the issues related to agricultural consumption. The figures in the tables for the last 5 years have been reviewed and the relevant supporting information included in the rWRMP14 Appendix 4.</p>	<p>Further information included in rWRMP14 Appendix 4.</p> <p>The rWRMP14 WRP Table 2BL/demand has been revised.</p>

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Individual	C16.1	Demand Forecast - Non Household Demand	Concerns about drilling operations by Cuadrilla Balcombe Ltd due to commence at Lower Stumble site; the drilling site is within 1 km of the village. Concern that streams located close to the proposed site, which lead to Ardingly reservoir (source of household water) may become contaminated due to accidental spillage during these operations. Ask whether SEW has been provided with a full list of chemicals to be used in fracking process and present in the waste brine and impact studies of the activities. What is the impact of taking substantial amount of water from the water cycle? Where will waste water be disposed of?	<p>The use of water for shale gas extraction would be classed as non-domestic purpose. A water company has a duty to provide water for non-domestic purposes under the Water Industry Act 1991 but this is subject to certain exceptions.</p> <p>These exceptions include cases where providing the water for non-domestic purposes would put at risk the ability of the water company to meet its other existing or probable future obligations to supply water. There is also an exception when unreasonable expenditure would be required in order to meet the water company's existing and future probable obligations to supply water. Water companies are required to show why an exception applies if they refuse to make a supply. If an applicant disputed a decision, Ofwat, or an arbitrator appointed by Ofwat, would deal with the dispute.</p>	<p>Clarification provided in the Statement of Response. No changes to the plan considered necessary.</p> <p>In rWRMP14 Section 4 and Appendix 4 we have clarified the process for all non-household applications for supply.</p>
Individual	C17.1	Demand Forecast - Non Household Demand	Supports efforts being made to support future water supply. However, concerned about contamination caused by 'fracking'. Wants to know if there is a contingency plan to provide clean water should contamination occur. Questions where the water supplies to enable the proposed scheme is going to come from.	<p>This means that water companies are not free to refuse to make a supply for non-domestic purposes and must be able to justify any refusal. This is why any request for a supply of water for shale gas extraction would have to be assessed on a case-by-case basis.</p> <p>In our dWRMP14 section 4, we explain that the plan includes a growth for non-household demand forecast based on historical consumption information, and therefore does not explicitly include at present water earmarked for future shale gas extraction.</p>	
Individual	C18.1	Demand Forecast - Non Household Demand	Concerned about risks to health and the environment posed by fracking. Essential to protect water supplies.	<p>It is important to recognise that South East Water does not supply all the industrial activities covered by its operating area. Many industries use water under their own abstraction licences and sources - for example farmers,</p>	

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Individual	C20.1	Demand Forecast - Non Household Demand	Raises a number of issues in regard to fracking, such as: contamination of water supply and agriculture (having to import more food), the rising cost of water; adverse effects on tourist industry. Believes that there are many problems associated with fracking that will only be noticed years down the line and that ordinary consumers should not have to pay for the clean-up of mistakes caused by fracking. Supports alternative methods of cleaner, renewable energy.	<p>energy industry, other large-scale users. These companies apply to the Environment Agency for a licence to abstract water themselves if the quantities are greater than 20 m3day (a licence is not required if less than 20 m3day). Each licence will have limits which will need to be complied with. Anyone who has an abstraction licence granted to them by the Environment Agency, like us, works closely with the regulator to monitor water resource situation and act accordingly.</p> <p>We have a legal duty and cannot make choices on who we supply, other than on grounds that relate to cost of the new supply or knock on effects to existing service e.g. increased risk to customers of low pressure. If we were to receive a request to supply water for shale gas extraction it would have to be assessed on a case-by-case basis against these criteria.</p> <p>South East Water is not a statutory consultee with regard to shale gas extraction but we are closely liaising with the Environment Agency on this subject. They are responsible for groundwater and environmental protection and are therefore responsible for ensuring that any proposals to implement hydraulic fracturing have measures in place to protect groundwater, surface water and the environment. Through our liaison we will wish to ensure that the risk associated with any proposal that progresses to planning are satisfactorily addressed.</p>	<p>Clarification provided in the Statement of Response. No changes to the plan considered necessary.</p> <p>In rWRMP14 Section 4 and Appendix 4 we have clarified the process for all non-household applications for supply.</p>
Individual	C21.1	Demand Forecast - Non Household Demand	Concerned about the issues surrounding 'fracking', which include: contamination and how SEW proposes to protect against this, concerns that water prices will soar; who will be responsible for ensuring the water table and water sources stays safe from contamination. Concerned about the reputation of Lord Browne, the chairman of Cuadrilla. Question as to why there has been no local consultation process before the process is allowed to proceed.		
Individual	C24.1	Demand Forecast - Non Household Demand	The process of fracking uses a considerable amount of water. How do SEW factor this added requirement of water into their Plan, as the process looks more likely to go ahead?		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Rother District Council	A5.6	Demand Forecast - Non Household Demand	Highlights the potential contamination risk to groundwater supplies due to inadequate casing and potential chemical leakages, including release of methane. Suggests robust regulation and supervision of exploration and drilling processes. In addition, the fracking process can use significant amounts of water, which has implications for the water stressed area and communities. Would welcome a robust approach to safeguard groundwater sources from potential contamination and ensure water consumption for the extraction process is minimised and does not prejudice supply to local communities.	See above	<p>Clarification provided in the Statement of Response. No changes to the plan considered necessary.</p> <p>In rWRMP14 Section 4 and Appendix 4 we have clarified the process for all non-household applications for supply.</p>
Slaugham Parish Council	PI.2	Demand Forecast - Non Household Demand	Consider making representations on the proposals to carry out shale gas exploration (fracking). Process would use significant water and in proximity to Ardingly reservoir.	See above	
Ash Parish Council	PI0.2	Demand Forecast - Non Household Demand	Though beneficial, water usage from fracking should be taken into account.	See above	



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Forest Row Parish Council	PI1.2	Demand Forecast - Non Household Demand	Has provision been made for possible water use requirement for hydraulic fracturing. Potential contamination of Ardingly Reservoir from proposed drilling at Barcombe.	See above	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Kent Wildlife Trust	G6.5	Demand Forecast - Non Household Demand	Plan does not include a forecast for gas extraction by hydraulic fracking, despite significant interest in the development of this industry in the south east. Demand from industry should be included in the calculations, together with options to manage the new demand.	See above	In rWRMP14 Section 4 and Appendix 4 we have clarified the process for all non-household applications for supply.
Kent County Council	A14.4	Demand Forecast - Non Household Demand	Agrees with SEW's observations of increasing water demand for agriculture and horticulture. Supports forecast level of growth and continued working between SEW and KCC to address this demand.	We acknowledge KCC's support during recent studies on growth in demand for agriculture and will continue to work with KCC in the future so that our WRMPs are aligned with KCC's plans and strategies.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Environment Agency	R2.15	Demand Forecast - Non Household Demand	Improvement 3 - Non-household demand Inconsistent information relating to base year. Should be corrected for final plan. Consider making full assessment of non-household demand and demand forecast at SIC level or equivalent before next draft plan.	We have met with the Environment Agency and addressed the improvements they have asked for. We are committed to carrying out a thorough review of our non-household customers' consumptions and trends against the industrial classification codes in preparation for the next WRMP in 2019.	No change to the plan, however additional text has been included in rWRMP14 Appendix 4.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.32	Demand Forecast - Non Household Demand	<p>Minor Issue (2) The company should clarify how the baseline forecast reflects latest information and discussions with commercial users, including whether the baseline of each resource reflects this information. If wider assumptions are translated to the resource zone level, the company should look to improve on this in future.</p> <p>The company should provide a more detailed update on progress of its projects with its commercial users.</p>	<p>We have met with the Environment Agency and addressed the minor issues they had. We are committed to carrying out a thorough review of our non-household customers' consumptions and trends against the industrial classification codes in preparation for the next WRMP in 2019.</p>	<p>No change to the plan, however additional text has been included in rWRMP14 Appendix 4.</p>
Individual	C7.1	Demand Forecast - Our Customer Metering Programme	<p>Concerned about the implementation of meters by SEW. Seeks information in writing regarding the costing and maintenance of meters. Writing to the SoS and Defra to express these concerns. SEW need to have licenced removed. Until there is a choice of supplier, water supplies should be managed by Not for Profit Companies.</p>	<p>The current metering programme was included in the last WRMP which was approved by Defra.</p> <p>The costs of the metering programme were fully assessed for the last WRMP and were shown to be a cost effective way of meeting the supply demand balance. The costs which were considered in the last plan included not just the initial meter purchase and installation but also the on-going costs of meter replacement and meter reading.</p> <p>Recent work has shown that the current metering programme is cost beneficial and the programme is broadly supported by customers. We are currently looking at developing new social tariffs to help customers who have trouble paying their bills and information will be included in the Business Plan.</p>	<p>Clarification provided in the Statement of Response. No changes to the plan considered necessary.</p>

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Individual	C10.1	Demand Forecast - Our Customer Metering Programme	Questions why larger properties in Forest Row are metered but not smaller properties that are located in the same area. Suggests that households are metered selectively on the basis that larger households usually pay more than smaller households with metering.	<p>The company policy is to meter all properties where it is economic to do so. We estimate that 10% of properties cannot be metered economically because installing a meter would have significant costs. For example having to replace a supply pipe under a building.</p> <p>Whilst there is evidence that larger households tend to use more water than unmeasured households this is not taken into account in our meter installation policy. Larger households pay more when they are unmeasured, so metering large households can result in lower bills for those properties.</p> <p>Properties in Forest Row and elsewhere are being metered solely on whether the cost of installing a meter is reasonable, and the potential income to the company is not considered.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Individual	C12.1	Demand Forecast - Our Customer Metering Programme	Concern that water savings achieved following installation of meters are not increased in subsequent years. Is this reflected in SEW's predictions?	<p>We have undertaken a review of the impacts of metering and we assume that the impact is consistent over the 25 years.</p> <p>There is uncertainty as to how customers will respond to metering in the long term, and we will update our demand forecast every five years to ensure that our calculations are correct. We have included some uncertainty for the impacts of metering in Target Headroom and our plan includes this risk.</p> <p>We also believe that metering can help influence customers in the long term when combined with water efficiency measures, and our forecast assumes on-going savings from metering as a result of additional targeted water efficiency campaigns.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Individual	C22.6	Demand Forecast - Our Customer Metering Programme	Questions why there is not more use of incentive tariffs/seasonal tariffs. Introduction of 'smart meters' should be brought in as quickly as possible.	<p>We are already installing meters which provide additional facilities for storing, recording, transmitting information, and these also identify supply pipe leakage at a property. A smart module provides us with the opportunity to reduce leakage and understand demands.</p> <p>We have carried out extensive trials on seasonal / incentive tariffs and the results are not conclusive on the benefits with regard to managing water consumption. We will continue to work with other companies and the regulators to explore these options and will consider including the results in our next plan.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
South Downs National Park Authority	A4.11	Demand Forecast - Our Customer Metering Programme	Section 4.48: support Company reaching 100% metering and not <100%.	<p>We believe that the current programme included in dWRMP14 and rWRMP14 is sensible as it maintains a balance between meeting the supply demand deficit whilst ensuring the programme is well managed and without impacting on customer service. However, we are focusing the programme in those areas with most risk of supply demand deficits.</p> <p>Once the current metering programme is complete, and we can ascertain the costs and benefits of exceeding 90% metering penetration. We will consider the cost and feasibility of an option to reach 100% meter penetration to be considered alongside other options in our next WRMP in 2019.</p>	Clarification provided in the Statement of Response. In Section 9.67 of rWRMP14 we have confirm our commitment to investigating an option to reach 100% meter penetration, to be appraised against other options in our next WRMP in 2019.
River Stour (Kent) Internal Drainage Board	G5.1	Demand Forecast - Our Customer Metering Programme	Believed greater urgency should be placed on reducing demand. Although additional metering is planned, current aim to meter 90% of customers by 2020 is not considered ambitious enough.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Rother District Council	A5.4	Demand Forecast - Our Customer Metering Programme	The Council is supportive of the introduction of metering as an effective means of reducing demand and a fairer way to pay for water. There is a need to ensure that vulnerable consumer groups are protected.	<p>We are currently undertaking work on the development of social tariffs and will consult with the Consumer Council for Water on our proposals during the development of our Business Plan.</p> <p>We will provide the same support to customers (for instance on supply pipe leakage) as we currently do throughout the AMP6 programme (period 2015 to 2020).</p> <p>We are analysing the data from the first tranche of metering to understand the benefits of our metering programme. We will share this data with Consumer Council for Water, and report on the results in our Annual Review of the WRMP for AR14.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Ashford Borough Council	A6.7	Demand Forecast - Our Customer Metering Programme	Queries whether or not SEW can bring forward CMP in Ashford to contribute the Council's wider planning policies in reducing water demand.	<p>Our analysis shows that our current metering programme is the best approach for ensuring levels of service across the company's supply area. Further detail of our metering programme is included in rWMP14 Appendix 4.</p> <p>Within Ashford Borough, the propensity for new housing in Ashford means it has one of the highest metering proportions in the region. Our analysis shows that we do not need further metering in Ashford until 2019, which is when it is currently forecast to be completed.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Surrey County Council	A8.1	Demand Forecast - Our Customer Metering Programme	Requests more information on current metering programme, with clear and ambitious targets set to roll out.	Our metering strategy to achieve 90% of metering by 2020 was part of our WRMP09 and this is still our intention in our dWRMP14 and rWRMP14. There is a lot of helpful information already available on our website <a href="http://www.southeastwater.co.uk">www.southeastwater.co.uk</a> for customers regarding our metering programme.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Kent County Council	A14.5	Demand Forecast - Our Customer Metering Programme	Need to consider option for accelerated metering.	Our analysis shows that our current metering programme is the best approach for ensuring levels of service across the company's supply area. Further details of our metering programme are provided in Appendix 4.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Institution of Civil Engineers South East England Water Panel	G8.6	Demand Forecast - Our Customer Metering Programme	Believe full effects of metering will only be felt when smart tariffs introduced. Believe considerable scope for reductions in per capita consumption which is high in comparison to Southern Water and Thames Water.	<p>We are installing meters with a smart module so that in the future we can consider alternative tariffs. Our customer research suggests that customers are not in favour of smart tariffs, and the work we have undertaken suggests they have little impact on consumption, so we believe it is too early to implement them. However we will continue to undertake trials and will consider them in the future if our customers support them.</p> <p>Our per capita consumption is higher than Southern Water and Thames Water but lower than Affinity Water and Sutton and East Surrey Water. Our plan includes a comprehensive set of water efficiency programmes to reduce per capita consumption, and we will continue to review the benefits of different water efficiency projects, but at this stage we need to ensure our plans are realistic.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/ SEA/HRA
Institution of Civil Engineers South East England Water Panel	G8.14	Demand Forecast - Our Customer Metering Programme	Encourage SEW to implement smart meters, ideally in collaboration with energy companies. Enable customers to get real time access to data. Also permit trial of sophisticated variable tariffs. Important trial tariffs are in place. Give water companies the confidence to base firm plans on water saving initiatives. Encourage Defra and the industry to monitor demand reductions to ensure projected levels are met.	<p>In its PR09 business plan South East Water was funded to install so called 'dumb' meters rather than the smart meters we proposed to install. We recognise the benefits of more advanced metering technology and at our own cost have installed meters with a smart module which provide additional functionality above 'dumb' meters.</p> <p>We have tested customer preferences for tariffs and our research shows that customers are opposed to sophisticated tariffs. Furthermore our trials of tariffs in Ashford suggested that alternative tariffs had no significant impact on consumption.</p> <p>As we collect more information on our metering programme we will be able to understand the impacts of metering on consumption and target water efficiency programmes accordingly. If in the future our research suggests that customers would support sophisticated tariffs we will undertake further trials and consider the implementation.</p> <p>We will continue to monitor per capita consumption and overall demand against our plan at each Annual Return and will continue to provide the information to Defra via the Environment Agency and Ofwat to ensure that our reductions are met.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Consumer Council for Water	R3.8	Demand Forecast - Our Customer Metering Programme	Expect to see comprehensive package of support for customers impacted by the compulsory metering programme to continue for second half of the programme and for company to conduct a thorough review of these elements. CCWater would expect to be involved in this review. Provide an opportunity to review the impact of the programme on customer demand and leakage and for the results to be reported to customers and stakeholders.	<p>We are currently undertaking work on the development of social tariffs and will consult with Consumer Council for Water on our proposals during the development of our Business Plan.</p> <p>We will provide the same support to customers (for instance on supply pipe leakage) as we currently do throughout the AMP6 programme.</p> <p>We are analysing the data from the first tranche of metering to understand the benefits of our metering programme. We will share this data with Consumer Council for Water, and report on the results in our Annual Review of the WRMP for AR14.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Albion Water	WI.3	Demand Forecast - Our Customer Metering Programme	Concern about reliance on demand management measures such as metering where the impact remains unproven.	<p>Our plan assumes a 10% reduction in per capita consumption as a result of metering, which is consistent with other companies' assumptions and the limited amount of evidence available.</p> <p>We are able to monitor the use of those customers who have been metered as part of the universal metering programme, and can compare that against the data we have for a sample of unmeasured properties. To date our analysis shows that our working assumptions used in our demand forecast are correct.</p> <p>In the longer term we cannot predict with certainty the benefits of metering, but we believe that by a combined approach of metering and water efficiency programmes we can maintain the reductions in per capita consumption.</p> <p>We have included uncertainty in the benefits of metering in our target headroom analysis and our plan ensures that there is a reasonable target headroom allowance should the effects of the metering programme change in the future.</p> <p>We will update our WRMP every five years using the latest data from the measured customers to ensure levels of service are met.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Individual	CI2.3	Demand Forecast - Per Capita Consumption	Why is per capita consumption in the South East higher than national average (quotes 175L for South East Water). Could a bonus over and above lower charges be introduced for those who beat the national figure.	<p>Per capita consumption in the South East of England is higher for several reasons, including:-</p> <ol style="list-style-type: none"> <li>1. Overall the population is more affluent and has a greater proportion of water using appliances.</li> <li>2. The area has lower rainfall than other parts of the country, so garden watering is more prevalent.</li> <li>3. Overall we are a less urban area so houses and gardens tend to be larger.</li> </ol> <p>In comparison with neighbouring water companies, however, our final per capita consumption is below the average per capita consumption for the region.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
	CI2.3			South East Water is committed to support customers reducing per capita consumption over the planning period to reduce bills and protect the environment. Our metering programme will mean that approximately 90% of our customers will be on a meter by 2020. Households with lower consumption will pay less than those with higher consumption whilst customers who are badly affected by the changes maybe entitled to support.	
Individual	CI4.2	Demand Forecast - Per Capita Consumption	Central government should legislate that all newly built homes have adequate storage and recycling.	<p>New build homes within the South East Water area are a significant part of planning for water efficiency. Details of South East Water's Water Efficiency Strategy are included in dWRMP14 Appendix 4. There are a large number of homes planned across the company area over the next 25 years. With the right initiatives and good planning, the construction of new homes provides the best opportunity for achieving 'best-practice' water efficiency in the most cost effective way. However, for measures not incorporated within Building Regulations, this requires commitment for third parties which is beyond the control of South East Water.</p> <p>There are a number of initiatives that have been implemented and some that are still being developed targeting new homes such as;</p> <ul style="list-style-type: none"> <li>• The Code for Sustainable Homes</li> <li>• Amendments to building regulations</li> <li>• KCC Kent Design Guide</li> </ul> <p>South East Water has been active in supporting and consulting on each of these initiatives and will continue to do so as appropriate. We will work with the local authorities across our area to consult on their future plans and to include and monitor water efficiency where possible.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
South Downs National Park Authority	A4.10	Demand Forecast - Per Capita Consumption	Section 4.4 and Appendix 4: Authority supports Water Efficiency Strategy to sustain levels of per capita consumption. Section 4.43: Pleased to see reduction in per capita consumption but can it go further, working in partnership?	We make it clear in our water efficiency strategy, as presented in Appendix 4D, that we are working with a number of other partners on the South East England water-for-all partnership. This is looking to develop a regional water efficiency plan for both domestic and non-household customers along with a joint communications programme. It is our intention to explore further partnership working in water efficiency and domestic water reduction opportunities in the future.	No changes to the plan proposed, however we provide clarification in rWRMP14 Appendix 4.
Swale Borough Council	A12.2	Demand Forecast - Per Capita Consumption	Cross references to relevant planning policies and Code for Sustainable Homes.	Whenever invited we are pleased to work with local authorities as they aim to make new developments more efficient. Our current research shows that per capita consumption in new households is approximately 120l/h/d as result of the Code of Sustainable Homes. We consider this to be a reasonable estimate over the long term.  Given the large demand being driven by increasing population and new homes, we need to ensure that our estimates of per capita consumption are realistic and evidence based.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Downswood Parish Council	P8.1	Demand Forecast - Per Capita Consumption	Over reliance on metering to control water demand. Whilst new houses fitted with devices, nothing to stop householders fitting power showers etc. and pushing up consumption. Many residents are of the view that if paying for water, they can use as much as they like. Grave concern about strategy being reliant upon reducing demand as question if this is achievable.	Our programme is a balanced twin track approach in line with the guidelines.  As we collect more information on our metering programme we will be able to understand the impacts of metering on consumption and target water efficiency programmes accordingly.  We will continue to monitor per capita consumption and overall demand against our plan at each Annual Return and will continue to provide the information to Defra via the Environment Agency and Ofwat to ensure that our reductions are met.  Our Plan is sufficiently flexible to allow us to respond to changes and course correct as necessary if the assumptions we have made do not materialise.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent Downs AONB Unit	G7.4	Demand Forecast - Per Capita Consumption	Support incorporation of recycling and grey water storage in all new builds and where possible, retrofitting.	<p>New build homes within the South East Water area are a significant part of planning for water efficiency. Details of South East Water's Water Efficiency Strategy are included in Appendix 4. There are a large number of homes planned across the Company area over the next 25 years. With the right initiatives and good planning, the construction of new homes provides the best opportunity for achieving 'best-practice' water efficiency in the most cost effective way. However, for measures not incorporated within Building Regulations, this requires commitment for third parties which is beyond control of South East Water:</p> <p>There are a number of initiatives that have been implemented and some that are still being developed targeting new homes such as;</p> <ul style="list-style-type: none"> <li>• The Code for Sustainable Homes</li> <li>• Amendments to building regulations</li> <li>• KCC Kent Design Guide</li> </ul> <p>South East Water has been active in supporting and consulting on each of these initiatives and will continue to do so as appropriate. We will work with the local authorities across our area to consult on their future plans and to include and monitor water efficiency where possible.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Institution of Civil Engineers South East England Water Panel	G8.13	Demand Forecast - Per Capita Consumption	Per capita consumption falls well short of Defra 130 l/h/d. Believe SEW could consider a more challenging target or give reasons in its final WRMP why it thinks such a target cannot be met.	<p>At the public inquiry into the PR09 WRMP there was evidence submitted regarding the per capita consumption figure of 130l/h/d. At the inquiry it was made clear by the inspector that the per capita consumption in the South East region would be expected to be above the 130l/h/d for various reasons, and the inspectors report suggests that a per capita consumption of c.150l/h/d would be a suitable benchmark for South East Water:</p> <p>Our dWRMP14 and rWRMP14 includes options to reduce per capita consumption to 148 l/hd/d, which is lower than the figure proposed in the inspector's report from the public inquiry.</p> <p>Our per capita consumption is higher than Southern Water and Thames Water but lower than Affinity Water and Sutton and East Surrey Water. Our plan includes a comprehensive set of water efficiency programmes to reduce per capita consumption, and we will continue to review the benefits of different water efficiency projects, but at this stage we need to ensure our plans are realistic.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.5	Demand Forecast - Per Capita Consumption	Recommendation 2:Per capita consumption Number of assumptions, including some micro-components and peaking factors, within the per capita consumption forecast appear to be close to the high side of the possible range. With the company expecting to be fully metered by 2020 this requires further investigation and evidence. Should include a full presentation of the sensitivity of its demand forecast to alternative per capita consumption assumptions. Provides a number of alternative assumptions that SEW should explore.	<p>We have discussed with and produced a comprehensive technical response to this comment for the Environment Agency. The technical response is available for viewing on request at our offices.</p> <p>Our rWRMP14 includes additional discussion on the sensitivity testing of various assumptions in response to this representation.</p>	No changes to the plan proposed, however we provide clarification in rWRMP14 Appendix 9.
Individual	C22.5	Demand Forecast - Population and Properties	Current forecasts are likely to be less reliable than when regional planning structure in place.	<p>We acknowledge within section 4 of the dWRMP14 that the revocation of the Regional Spatial Strategy (RSS) – also known as the South East Plan – has removed the only statutory link between water resources planning and spatial planning. To address this and as detailed within dWRMP14, we have undertaken extensive consultation with the individual local planning authorities to understand and verify their growth projections.</p> <p>There are always some uncertainties in forecasting the demand for water in the future, especially when making predictions 25 years ahead. To take account of this, a planning allowance, or 'target headroom' is added to the demand forecast. Our target headroom takes into account uncertainties around future population growth (see section 5 of the rWRMP14).</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Wokingham Borough Council	A1.1	Demand Forecast - Population and Properties	Ensure we use best up to date projections available and consider housing and employment land requirements set out in the Council's Core Strategy and Managing Development Delivery Development Plan Document, the latter is expected to be adopted by end 2013.	<p>We welcome the input to date into our WRMP14 process from a number of local authorities.</p> <p>We acknowledged in section 4 of the dWRMP14 that our growth forecasts would require updating to take account of the 2011 census and updated information about growth provided to us by local authorities. Experian have undertaken this work and provided us with updated property growth forecasts (see rWRMP14 Appendix 4).</p> <p>The revised Experian plan-based forecast suggests annual property figures of around 7,500 per annum, significantly lower than the dWRMP14 figures of over 10,500 per annum. In terms of population, the updated population forecasts indicate a population of 12,200 above the dWRMP14 figure in the 2011/12 base year, but 11,300 fewer at the end of our planning period in 2039/40 at the company level. Whilst this is a small change (0.6%), we have revisited our demand forecasts and updated the forecasts with the information.</p> <p>We appreciate that a number of local planning authorities are continuing to develop their local plans and that these will evolve over our planning period. We will continue to liaise closely with planning authorities and review and comment on emerging plans and strategies as necessary. We will reflect any updated information on planned growth within our area during the statutory annual WRMP review process. We also account for some uncertainties around household growth within our target headroom.</p>	The population and housing forecasts (rWRMP14 section 4.27) have been updated. There are consequently a number of changes to the text and tables in section 4 of the rWRMP14.
Wokingham Borough Council	A1.2	Demand Forecast - Population and Properties	Ensure the draft WRMP aligns with related policies concerning sites allocated for housing and employment growth.		
Rother District Council	A5.3	Demand Forecast - Population and Properties	Requests clarification of property numbers in WRMP to accommodate additional planned growth in Rother district.		
Ashford Borough Council	A6.2	Demand Forecast - Population and Properties	Clarification of projected population and housing growth needed and acknowledges that the Plan makes an allowance for uncertainty. Projections to be updated and SEW will be kept informed.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA HRA
Canterbury City Council	A9.4	Demand Forecast - Population and Properties	Ensure an up to date forecast is included in WRMP in respect of proposed population changes and development sites.	<p>We welcome the input to date into our WRMP14 process from a number of local authorities.</p> <p>We acknowledged in section 4 of the dWRMP14 that our growth forecasts would require updating to take account of the 2011 census and updated information about growth provided to us by local authorities. Experian have undertaken this work and provided us with updated property growth forecasts (see rWRMP14 Appendix 4).</p> <p>The revised Experian plan-based forecast suggests annual property figures of around 7,500 per annum, significantly lower than the dWRMP14 figures of over 10,500 per annum. In terms of population, the updated population forecasts indicate a population of 12,200 above the dWRMP14 figure in the 2011/12 base year, but 11,300 fewer at the end of our planning period in 2039/40 at the company level. Whilst this is a small change (0.6%), we have revisited our demand forecasts and updated the forecasts with the information.</p>	The population and housing forecasts (rWRMP14 section 4.27) have been updated. There are consequently a number of changes to the text and tables in section 4 of the rWRMP14.
East Sussex County Council	A10.10	Demand Forecast - Population and Properties	Recognises challenges of managing uncertainty in light of climate change and planning for water supplies with revocation of RSS. Policy based projections supplied with response for SEW to consider.		
Swale Borough Council	A12.1	Demand Forecast - Population and Properties	Have engaged with Experian during the preparation of WRMP. Ensure account is taken of most up to date housing growth figures and highlights the possible increase in housing provision requirements.		
Swale Borough Council	A12.6	Demand Forecast - Population and Properties	Reminds SEW of the emerging local plan and the opportunity to comment on the proposed development targets, which are considered crucial to ensuring a sustainable level of development for the Borough.	We appreciate that a number of local planning authorities are continuing to develop their local plans and that these will evolve over our planning period. We will continue to liaise closely with planning authorities and review and comment on emerging plans and strategies as necessary. We will reflect any updated information on planned growth within our area during the statutory annual WRMP review process. We also account for some uncertainties around household growth within our target headroom.	

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Kent County Council	A14.3	Demand Forecast - Population and Properties	Projected population and housing growth broadly in line with KCC current expectations. Acknowledges that the Plan makes an allowance for uncertainty. Projections to be updated and SEW will be kept informed.	<p>We welcome the input to date into our WRMP14 process from a number of local authorities.</p> <p>We acknowledged in section 4 of the dWRMP14 that our growth forecasts would require updating to take account of the 2011 census and updated information about growth provided to us by local authorities. Experian have undertaken this work and provided us with updated property growth forecasts (see rWRMP14 Appendix 4).</p> <p>The revised Experian plan-based forecast suggests annual property figures of around 7,500 per annum, significantly lower than the dWRMP14 figures of over 10,500 per annum. In terms of population, the updated population forecasts indicate a population of 12,200 above the dWRMP14 figure in the 2011/12 base year, but 11,300 fewer at the end of our planning period in 2039/40 at the company level. Whilst this is a small change (0.6%), we have revisited our demand forecasts and updated the forecasts with the information.</p> <p>We appreciate that a number of local planning authorities are continuing to develop their local plans and that these will evolve over our planning period. We will continue to liaise closely with planning authorities and review and comment on emerging plans and strategies as necessary. We will reflect any updated information on planned growth within our area during the statutory annual WRMP review process. We also account for some uncertainties around household growth within our target headroom.</p>	The population and housing forecasts (rWRMP14 section 4.27) have been updated. There are consequently a number of changes to the text and tables in section 4 of the rWRMP14.
Burgess Hill Town Council	P7.1	Demand Forecast - Population and Properties	Felt report needed to cater for short term and interim as well as long term. Burgess Hill Town Council's Town Wide Strategy forms part of District Plan. Proposes 4,500 houses in next 20 years, 450 new homes have already been approved.		
Ofwat	R4.8	Demand Forecast - Population and Properties	SEW should look again at its population forecast now that the 2011 Census data is available.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Wokingham Borough Council	AI.4	Demand Forecast - Population and Properties	Support partnership working with Council regarding their Water Efficiency policies and their target of 105 l/h/d consumption or less for new residential development and non residential development to meet or exceed statutory requirements.	Whenever invited we are pleased to work with local authorities as they aim to make new developments more efficient. Our current research suggests that per capita consumptions in new households are not as low as 105l/h/d and our plan assumes a figure of approximately 120l/h/d in line with the Code for Sustainable Homes estimates, which we consider to be reasonable over the long term. We would be pleased if the Council contacted our Water Efficiency Manager directly regarding its work so we can develop a partnership.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Slaugham Parish Council	PI.3		Priority should remain existing customers. Serious consideration should be given to objecting to major increases in demand for water, such as major housing development, unless supply in place.	South East Water has certain statutory duties to meet as a water supply company. Section 37 of the Water Industry Act 1991 places a duty on the Company to develop and maintain an efficient and economic system of water supply in our area. This is known as our statutory duty to supply water.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Ash Parish Council	PI0.1		Acceptance of plan in principle provided demand remains as forecast and any increase in demand from excessive house building is resisted.	Given our statutory duty to supply water, we work closely with local planning authorities to understand the level of growth that is planned and account for this in our population forecasts. We also need to understand each Local Planning Authorities' proposed development locations and housing forecasts so that we can consider whether there is capacity within the local supply network to accommodate such development.	



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Kent Wildlife Trust	G6.3	Demand Forecast - Population and Properties	Revocation of SE Plan removed statutory link between water resources and spatial planning. Not clear how assessed potential cross boundary impacts on demand, as growth forecast appear only to be assessed within company's own WRZs. Wish to be assured that SEW has taken sufficient account of activity of neighbouring water companies in light of population change.	As stated in dWRMP14 Section 4 all companies in the WRSE area used Experian to determine property and population forecasts. The WRSE modelling ensures that our strategy is consistent with other companies' plans and assumptions about growth in population and properties and ensures that security of supply is maintained across the South East of England.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
CPRE Kent	G9.8	Demand Forecast - Population and Properties	Make clear that until essential supply-side components of short to mid-term programme have been identified and evaluated based on realistic deficit forecasts, company will not be in a position to support new housing developments other than at current relatively low levels of service, i.e. more frequent imposition of temporary bans. CPRE raised concerns about ability to maintain levels of service in relation to proposed Chilmington Green development.	<p>South East Water has certain statutory duties to meet as a water supply company. Section 37 of the Water Industry Act 1991 places a duty on the company to develop and maintain an efficient and economic system of water supply in our area. This is known as our statutory duty to supply water:</p> <p>Given our statutory duty to supply water, we work closely with local planning authorities to understand the level of growth that is planned and account for this in our population forecasts. We also need to understand each Local Planning Authorities' proposed development locations and housing forecasts so that we can consider whether there is capacity within the local supply network to accommodate such development.</p> <p>We believe our plan provides sufficient confidence to meet the agreed levels of service with respect to water restrictions.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Environment Agency	R2.4	Demand Forecast - Population and Properties	<p>Recommendation 1: Demand Forecast</p> <p>Used population and property forecast that could significantly overestimate demand over the planning period. If demand is overestimated then may implement schemes that are inappropriate or unnecessary. Does not provide adequate justification for choosing this population and property forecast. Recommend the company re-assess population and property projections using data from the 2011 census and re-adjusted Experian scenarios. Company should present a clear, quantified comparison with trend- and plan- based predictions and should explain why it has chosen the selected forecast used in the final plan. If continue to use the Experian 'most likely' scenario in its final WRMP it should explain why it thinks these projections are likely given the current economic circumstances and prospects. Should include sensitivity testing of the chosen demand forecast with alternative forecasts to show the impact on forecast deficit and preferred options. Check headroom allowance is suitable or adjust it as appropriate relative to the demand forecast.</p>	<p>Since the publication of the dWRMP14 Experian have provided new populations and housing forecasts based on the latest census. We have updated our Demand Forecast using the Plan Based forecast and these changes are reported in section 4 of the rWRMP14.</p> <p>We have updated our target headroom calculation outlined in dWRMP14 section 5.5 to account for uncertainty in the demand forecast as well as other changes such as bulk supply agreements.</p>	<p>The population and housing forecasts (rWRMP14 section 4) and target headroom calculations (rWRMP14 section 5) have been updated.</p>
Environment Agency	R2.14	Demand Forecast - Population and Properties	<p>Improvement 2 - Occupancy</p> <p>Assumes lowest occupancy in south east. Need to explain assumed measured and unmeasured household occupancy. Clarify impact occupancy on per capita consumption and present sensitivity to different occupancy assumptions on per capita consumption, population and overall forecast demand.</p>	<p>We have discussed with and produced a comprehensive technical response to this comment for the Environment Agency.</p> <p>Our rWRMP14 includes additional discussion on the sensitivity testing of various assumptions in response to this representation.</p>	<p>Additional text on the sensitivity testing has been included in rWRMP14 section 9.</p>
Surrey County Council	A8.2	Demand Forecast - Water Efficiency	<p>Requests further explanation as to how the proposed water efficiency programme will be integrated with CMP and the programme for this, including any plans to target high consuming households and other possible measures.</p>	<p>Further information on our water efficiency programme and its integration into the CMP is provided in Appendix 4D and on our website. Currently we support customers who are found to have a high consumption as a result of our universal metering programme with tailored advice.</p>	<p>Clarification provided in the Statement of Response. No changes to the plan considered necessary.</p>

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Uckfield Town Council	P9.5	Demand Forecast - Water Efficiency	South East Water should be commended for steps taken to reduce water usage.	We welcome acknowledgment from Uckfield Town Council of our water efficiency programme.	No changes considered necessary.
Environment Agency	R2.46	Demand Forecast - Water Efficiency	Minor Issue (16) South East England Water Efficiency Partnership - It would be good to see some explicit support for the South East England Water Efficiency Partnership in the company's plan.To date the Partnership (with a membership of water companies, Environment Agency, CC Water, Kent CC, Energy Saving Trust and WWF) has worked to identify cost efficient and collaborative approaches to the delivery of water efficiency across the South East that complements existing water company approaches rather than replacing them.	<p>South East Water is a member of the South East England Water Efficiency Partnership and a strong advocate for delivering on the work promised by the group.</p> <p>In Appendix 4, Water Efficiency Strategy Summary, section 5 we list a number of other partnerships the Company is committed to.We will update the Appendix to confirm more explicitly our current support to the South East England Water Efficiency Partnership.</p>	No changes considered necessary to the plan however we have updated Appendix 4 to confirm more explicitly support for the South East England Water Efficiency Partnership.



# Appendix 2 - Table 8E - Target Headroom

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Environment Agency	R2.7	Target Headroom	Recommendation 4:Target Headroom Target headroom increase is a significant proportion of the overall increase in deficit over the planning period. Should explain and justify the larger growth in proposed target headroom. Company should: provide a summary by zone and by component; review its level of risk and provide further justification; present headroom figures for alternative risk percentiles; review target headroom calculation with particular focus on the component contributions that have been included for bulk imports, gradual pollution and demand forecast uncertainty.	<p>We have provided an updated report, discussed with the Environment Agency in a series of meetings to include further clarity and detail of our target headroom assumptions.</p> <p>We have updated target headroom with the latest demand forecast and revisions to Bulk Supplies as agreed with Southern Water. We have not changed the gradual pollution calculations, as we believe our approach is reasonable, and is consistent with the methodology and previous assessments.</p>	We have updated the target headroom figures in rWRMPI4 Section 5 and included a new target headroom report in rWRMPI4 Appendix 5.
Environment Agency	R2.23	Target Headroom	Improvement 11 - Components of Headroom Company should provide further explanation about a number of components that make up target headroom. Large growth in proposed target headroom which has not been fully justified.	The updates we have made have resulted in some minor downward adjustments to our target headroom values in the rWRMPI4 compared to the dWRMPI4.	
Environment Agency	R2.43	Target Headroom	Minor Issue (13) Headroom - The company should set out whether any of the uncertainty around the components of headroom could be reduced.		
Environment Agency	R2.47	Target Headroom - Developing Our Preferred Plan	Minor Issue (17) Minor errors in Appendix 5 and 8 should be corrected.	We have corrected minor discrepancies in Appendix 5 and Appendix 8.	We have updated the target headroom figures in rWRMPI4 Section 5, produced a new rWRMPI4 Appendix 5 and made relevant updates to Appendix 8.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Ofwat	R4.3	Target Headroom	SEW should clearly articulate to customers the need for increased headroom and whether service levels around temporary use restrictions will improve as a result. Explain what customer support there is for the large increase it is proposing in target headroom.	<p>The target headroom we have adopted for WRMPI4 are lower than those included in our current published plan WRMP09, for the first 15 to 20 years of the planning period, and slightly higher in the last 5 years of the 25 year planning period.</p> <p>Target headroom makes a significant proportion of the increase in the supply demand deficit in the latter part of the planning period because it is a planning margin that must account reasonably for future uncertainties.</p> <p>The target headroom values in the latter part of the plan do not drive immediate investment decisions in AMP6 (period 2015 to 2020) or alter levels of service to customers. Instead they provide us and our customers with a prudent future timetable of when we might need to consider developing options should part or all of that uncertainty materialise.</p> <p>During the extensive qualitative and quantitative research undertaken in preparing the current dWRMPI4 and Business Plan, customers have consistently told us that having reliable supplies are a priority for them, whatever the challenges faced by the Company – such as higher demand for water due to increasing population or climate change.</p> <p>Furthermore, through specific willingness to pay research, our customers have shown their support for maintaining levels of service that ensure they should only experience temporary water use restrictions once every ten years.</p> <p>Our increasing target headroom is not designed to improve levels of service, not least as customers have said they are unwilling to pay for an improvement. The change in target headroom enables the Company to improve the overall resilience of its supply network, so it can be more confident of meeting that 1 in 10 level of service that customers expect and pay for.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.





# Appendix 2 - Table 8F - Optioneering

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Individual	C22.3	Optioneering - Process	Use of realistic shadow environmental charges applied equally to supply and demand side options would achieve better balance between options.The concept of NEGA litres not received much attention - Cheaper to save a litre than supply a litre.	<p>The approach taken follows the best practice guidance that was available when the scheme costs were prepared for input into the WRSE modelling. That methodology has been applied consistently across different schemes. This takes into account that the types of impact vary greatly, and the level of information on the schemes had limitations.</p> <p>More recent guidance on carbon costing has been issued and is incorporated into the new edition of the SEW carbon calculator. A review has been undertaken to check what difference using more recent carbon costing guidance would have made.The review demonstrated that the difference would be nominally very small and is highly unlikely to change the relative rankings of the schemes.</p> <p>It was noted that in some cases construction information was not available for the WRSE costs in sufficient detail to allow full carbon costing. A review has been undertaken to determine the difference updating these would make to the schemes. Some examples have been tested - the differences to the costs, which include operational carbon costs over the lifetime of the scheme, are generally small.</p> <p>Regarding non-carbon environmental and social costs, the approach that was taken was based on current best practice. Due to the assessment that the impacts on supply and demand schemes would affect different receptors, it was decided to approach them separately. However the same guidance was used to construct the bespoke tools that were consistently applied across the schemes.</p> <p>A breakdown of Environmental and Social Costs has now been provided in rWRMPI4 Appendix 7.</p>	Clarification provided in the Statement of Response and revised rWRMPI4 Appendix 7.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Environment Agency	R2.25	Optioneering - Process	<p>Improvement 13 - Carbon, environmental and social cost methodology</p> <p>Not clear if approach to carbon costing is consistent with best practice. Consider whether an improved approach is possible and what difference it could make to the plan. Should review methodology used to identify and assess environmental and social costs and examine specific schemes to ensure consistent application of methodology.</p>	We have confirmed with the Environment Agency that our approach is in accordance with best practice and has been consistently applied.	Clarification has been included in the rWRMPI4 Appendix 7.
Environment Agency	R2.30e	Optioneering - Process	<p>Improvement 18e - Options: Metering</p> <p>As the company has included its compulsory metering programme in its baseline, it has not been assessed as an option.</p> <p>The company:</p> <ul style="list-style-type: none"> <li>• Could perform a light-touch assessment on any additional selective metering that could be done that is not included in the current programme,</li> <li>• Should present further information on the cost benefit analysis.</li> </ul>	In Section 9.67 we have committed to undertake further studies in AMP6 to understand if further metering (i.e. achieving 100% meter penetration) is economic. We will provide further information on the cost benefit analysis prior to our dWRMPI9.	We have clarified the additional work we will undertake in rWRMPI4 Section 9.67.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.44	Optioneering - Process	Minor Issue (I4) Options - For clarity, the company should add a summary table of the feasible options (not revised) and explain reasons for exclusion that are detailed in Appendix 7E. In Appendix 7E, adding references to the constrained list (following coarse screening) and feasible list (following fine screening) would improve the reader's understanding. Regarding conjunctive use options, the company should ensure that the text on p44 is consistent with Appendix 7E.	<p>The presentation of the summary table of feasible options in Appendix 7E and the text describing the revisions to the list of feasible options in Appendix 7 has been modified to improve clarity.</p> <p>Conjunctive use options: Inadvertently the version of Appendix 7E published on the SEW website with the dWRMP14 was slightly out of date. The corrected version in the rWRMP14 is consistent with the text on p44 of Appendix 7, with 3 conjunctive use options being progressed through the fine screening stage of the option appraisal process followed.</p>	<p>Revised rWRMP14 Appendix 7 text and tables are included.</p> <p>rWRMP14 Appendix 7E has been corrected and updated.</p>
Environment Agency	R2.45	Optioneering - Process	Minor Issue (I5) Options - metering. The company should ensure that Appendix 7E is consistent with Appendix 7.	rWRMP14 Appendices 7E and 7 have been revised to be consistent.	<p>Revised rWRMP14 Appendix 7 text and tables are included.</p> <p>rWRMP14 Appendix 7E has been corrected and updated.</p>
Environment Agency	R2.18b	Optioneering - Climate Change	Improvement 6b - Climate Change - Options Should follow water resources planning guideline (section 3.3.6) and provide an assessment of the impact of climate change on preferred plan options.	<p>As far as practical we have followed the Water Resources planning guideline Section 6.5.4 and provided an assessment of the impact of climate change on all our feasible options.</p> <p>We have provided the Environment Agency with further information on the impacts of climate change on our preferred plan as a separate technical note which shows the plan to be resilient to climate change. This means our preferred plan does not increase our risk from weather changes.</p>	<p>An additional report "Review of Potential Climate Change Impacts on SE Water's Feasible Options List" (HR Wallingford September 2012), is included as a new rWRMP14 Appendix 7F.</p> <p>A new Appendix 9 of rWRMP14 includes a summary of this information.</p>

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Individual	C9.3	Optioneering - Aquifer Recharge Options	Does not state the cost of developing aquifer recharge options. Option likely to be cheaper than reservoir and has the advantage of minimising evaporation. Comparative financial data should be available from Thames Water.	<p>We included a number of aquifer recharge (or Aquifer Storage Recovery - ASR) schemes as options. We have undertaken trials in the past in Kent. Our analysis suggests that it is not currently a preferred solution and might not be feasible too – see details in Appendix 7E. Aquifer Recharge is a possible alternative option in the future and we will continue to review its viability and consider it as alternatives to other options in future plans.</p> <p>Whilst Aquifer Recharge can be economic in other parts of the UK, our analysis shows that the aquifers in the South East of England are generally not suited to these schemes. As a result, although technically feasible, they tend to have small yields and as a result are less efficient than alternatives such as those in the Thames Basin.</p>	<p>An additional report "Review of Potential Climate Change Impacts on SE Water's Feasible Options List" (HR Wallingford September 2012), is included as a new rWRMP14 Appendix 7F.</p> <p>A new Appendix 9 of rWRMP14 includes a summary of this information.</p>
Albion Water	WI.4	Optioneering - Aquifer Recharge Options	Concerned about artificial recharge schemes using treated effluent.	We have not considered artificial recharge schemes using treated effluent in our plan.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Natural England	RI.28	Optioneering - Demand Management Options	Contribution of demand management measure to indirect delivery of environmental protection through a potential contribution to reduced sewer flooding has not been given weight in dWRMP14.	<p>In our dWRMP14 we did not consider the benefits of demand management on sewer flooding. Sewers are designed to operate effectively under 'normal' conditions. Sewer flooding occurs because of failure of downstream assets, such as pumping equipment, or from ingress of surface water into the sewer system (or sometimes both).</p> <p>We have considered if it is appropriate to include an assessment of the benefits of demand management on sewer flooding for the rWRMP14. We have concluded that because sewer flooding is caused by either asset failure or rainwater ingress, the benefits are marginal. It would also be extremely difficult to quantify the benefits in a meaningful way.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Kent County Council	A14.15	Optioneering - Demand Management Options	Suggest greater emphasis on demand side options would be consistent with customer preferences (Appendix 8).	<p>We support a twin track approach to water resources and are proposing an ambitious demand management programme of universal metering, water efficiency and leakage reduction, all of which occur for the greater part in advance of promoting and developing significant new resource schemes.</p> <p>Whilst customers expressed overall support for reducing per capita consumption there were some options to reduce demand which were not supported. Our plan includes those options which had overall support, but excludes options customers did not wish to see implemented.</p> <p>We confirm that the preferred plan demand management options are consistent with customer preferences as described in Appendix 8 of the rWRMP14.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Dartford Borough Council	A13.3	Optioneering - Desalination	Argues that the alternative option of a desalination plant on the River Medway is needed. This should be operating in time to meet additional water supply required that would otherwise have been supplied through bulk supplies from Southern Water.	<p>The option of a desalination plant on the River Medway has been considered and is included as an alternative option within our plan.</p> <p>The preferred plan has been selected as the best value mix of the options considered following a detailed programme development process as described in the dWRMP14 Section 8. We do not propose to change the options included in the preferred plan based on the representation received but we do consider it in our rWRMP14 as an alternative to other options.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Individual	C22.14	Optioneering - Groundwater options	Number of alternative sources referred to in the past that merit re-consideration: Hinxhill, north of Ashford; Eastry; Tilmanstone mine waters; Pluckley; Sopers Lane, Tunbridge Wells; Wittersham; St Nicholas at Wade; Court Wood Borehole; BOI - Harrietsham, Selling, Throwley	A number of these sites has been considered as part of the WRMP14 but were either not progressed through our optioneering process described in Section 7 of dWRMP14, or selected during the development of our preferred plan described in Section 8.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.42	Optioneering - Levels of Service	Minor Issue (12) Alternative Levels of Service - The company should have considered alternative levels of service in its options appraisal, as suggested in Appendix 9 of the WRPG. We would like to see the company's view on how alternative levels of service could have any impact on the plan and if so, be assessed relative to other options.	<p>We have provided more clarification to the Environment Agency on our approach to levels of service, and included further details in rWRMP14 and Appendix 9B.</p> <p>Our approach includes sensitivity testing and customer testing of adopted, planned and reference levels of service which explore the impact of various alternative assumptions on our preferred plan. We conclude that our planned level of service satisfies our customer expectations, our regulatory requirements and meets the best value cost for the plan. We have provided a further technical note to the Environment Agency, and this is available to view on request at our offices.</p>	Clarification provided in the Statement of Response. Updated rWRMP14 with Appendix 9B.
Institution of Civil Engineers South East England Water Panel	G8.7	Optioneering - Licence Trading	Little evidence of coordination between SEW and other abstractors of water; although note SEW explored taking over dormant/private abstractions.	<p>Throughout the process we have liaised with other water companies who are the major abstractors in the region and participated fully in the WRSE regional water resources modelling. Where spare capacity is available and it is economic to do so, we have explored fully plans to use that spare capacity via bulk transfer agreements.</p> <p>We identified a list of other abstractors who may have had surplus water available for us and contacted them. As indicated in dWRMP14 Appendix 7E, no positive response was received from any of the licensees.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/ HRA
Individual	C11.1	Optioneering - Reservoir Options	Requested further information about Reservoir site at Thurnham	A thorough review of reservoir sites across the company's supply area was undertaken and a number of sites were selected as potentially suitable for reservoirs. As summarised in dWRMP14 Appendix 7E, the site at Longham Wood, Thurnham (Option SW-261) was not selected as a suitable site for a reservoir because of the topography (the site has a very small capacity) and environmental sensitivities (ancient woodland). The unit cost of water would be very high compared with other options. There is also a Scheduled mediaeval moated site (Ripple Manor) to the north and a Grade II Listed Building (Howe Court) to the south east, the settings of which could be impacted.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Individual	C11.2	Optioneering - Reservoir Options	Important archaeological features near Thurnham		
Individual	C22.15	Optioneering - Reservoir Options	Considers that series of lakes in Stour Valley could be developed for water supply - Brett's Gravel Extraction at Shalmsford Street. South of Canterbury - Stodmarsh Lake, Westbere, Stonar, new bankside storage	Several lakes in old gravel pits in the Stour Valley were considered as options (e.g. Stodmarsh option SW-66 in dWRMP14 Appendix 7E). However, all these gravel pit options were excluded at the fine screening stage as described in section C2.2 of dWRMP14 Appendix 7C. These options have been considered in the past, when it has been concluded they would exist in hydraulic continuity with the underlying chalk aquifer from which we already abstract and which is classified by the Environment Agency as "over-abstracted". This chalk river is sensitive from a landscape and ecological perspective, and is under review in terms of long term sustainability of current water abstraction levels. For this reason, these options have not been included within our preferred water resource options set.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14 /SEA/HRA
Ash Parish Council	PI0.4	Optioneering - Transfer Options	A transfer of water from Wales and West England to East Anglia and South East England should be considered as a long term solution to South Eastern England's shortfall.	We have fully supported and participated in the WRSE group that has modelled the most effective regional approach to managing water resources across the South East of England, working in partnership with the other water companies in the region.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Ouse and Adur Rivers Trust	G3.8	Optioneering - Transfer Options	As South East England is water stressed, more consideration should be given to economical methods of transfer from areas where there is spare capacity.	The options developed by the WRSE Group have influenced our plan and in particular options identified by other water companies can create capacity in their areas. WRSE companies which share borders with other water companies with spare capacity have included options in their plans to import water and, via the Bulk Supply options we have identified in dWRMP14 Table 7.2, we can utilise that water in our supply area. Therefore, although our optioneering does not directly show these transfers from outside the region, our participation in the WRSE modelling means that such options identified by other companies were available to us and have been considered.	
CPRE Kent	G9.6	Optioneering - Transfer Options	CPRE campaigns for adoption of regional and inter regional raw water transfers. Priority for transfers identified by Thames Water from Severn basin. Has company looked at joint initiatives with Thames and in partnership with other Kent based companies.		
Kent Wildlife Trust	G6.14	Optioneering - Transfer Options	No consideration appears to have been given to the impact on the natural environment at a landscape level of infrastructure required to increase transfers. Appendix 7 (7.3.1) suggests impacts will be considered and avoided but a more robust approach should be taken to the avoidance of impacts on both designated sites and locally important sites. Potential to inflict significant and irreversible damage upon ancient woodland. Given energy and environmental cost of pumping water, want to see real cost benefit argument for why it is better to pump water rather than conserve resources at source.	<p>The landscape impacts from the transfers are addressed in the SEA Environmental Report. The assessment is based on preliminary routing of transfers aimed at avoiding designated sites and ancient woodland as far as possible. The SEA Environmental Report recognises the need to avoid irreversible impacts on ancient woodland and other habitats types. South East Water is committed to undertaking further detailed routeing to assess potential impacts including on locally important sites, hedgerows and protected species. This is also reflected in the Environmental Action and Monitoring Plans.</p> <p>Energy and related carbon costs have been monetised and taken into account in the modelling to select options for the plan in accordance with the WRMP guidelines.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.11	Optioneering - Transfer Options	Encourage South East Water and Southern Water to further discuss possible benefits of inter-connectivity them near the Sussex coast.	In discussions with Southern Water we have explored transfers in Sussex. Work has shown that in AMP6 no transfers are required, but both companies are committed to reviewing these options for AMP7 (period 2020 to 2025) through the WRSE group or jointly as part of on-going studies. We note that these options were included in the WRSE work, and rarely selected, but we will work together to review the potential for them in the future.	Clarification provided in the Statement of Response. We have included additional text in rWRMP14 Section 9.
Albion Water	W1.6	Optioneering - Transfer Options	Consider importing water from outside the area remains best option to provide resilience that is needed. Have innovative proposal based on supplying high quality water from sustainable sources outside the UK. Cost comparative to new water projects. Benefit if initiative could be part of regional approach.	We are interested in discussing further with Albion Water their ideas and proposals. We met with them in October 2013 to start those discussions.  In this regard we consider options proposed by Albion Water as being best considered for the next review of the WRMP in 2019. This will allow sufficient time to appraise the options and to consult with our customers on their acceptability.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Environment Agency	R2.37	Optioneering - Water Treatment Works Options	Minor Issue (7) Process Loss - Options. The company should clarify the situation regarding Bray surface water treatment works.	Inadvertently the version of Appendix 7E published on the SEW website with the dWRMP14 was slightly out of date. The corrected version confirms that the reason for excluding this option (WT-12) from the Revised Feasible List is: "No CAPEX is required to implement this option so it is being progressed outside WRMP14".	rWRMP14 Appendix 7E has been updated.

# Appendix 2 - Table 8G - Developing Our Preferred Plan

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Individual	C9.2	Developing Our Preferred Plan - Comparative Costs	Appendix 8 demonstrates customer preference for water re-use ahead of reservoirs and minimising on-going water bills. However, Broad Oak is preferred ahead of water re-use from Weatherlees. Even desalination at Reculver is cheaper than Broad Oak Reservoir. Absence of comparative financial data to demonstrate SEW is acting in its customers' interest is disturbing,	<p>Comparative financial data on all the feasible options considered in draft plan are provided in the WRP tables and has been available throughout the consultation on the draft plan. The Company took a conscious decision to adopt the regional Water Resources in the South East (WRSE) model to develop its preferred plan. This model is supported by the Regulators; has been independently peer reviewed; and includes cost information that has been through an independent cost consistency exercise. This has enabled South East Water to demonstrate to a high degree of robustness around costs to ensure it can act in customers' best interests. The WRSE model takes account not only of the capital costs noted specifically in the representation but also both fixed and variable operating costs. Variable operating costs in particular are significantly higher for both water re-use and desalination than they are for reservoir options.</p> <p>In paragraphs 9.23 of dWRMP14 'we recognise that further work needs to be undertaken [for Broad Oak]', and in paragraph 9.24 of dWRMP14 we explain how we wish 'to promote an investigation during 2015 to 2020 of the main strategic options in East Kent with Southern Water and Affinity Water. We can see considerable potential for overlap between the companies' plans in the East Kent area over the 25 year planning period. We believe this further investigation is necessary to explore what we see as potential opportunities to conjunctively develop and operate a range of options together e.g. Broad Oak, Plucks Gutter Weatherlees water re-use and inter-Company transfers, in order to maximise yield potential in the region, and minimise environmental impacts and costs.' All the companies have since confirmed their commitment to the East Kent investigations, and this work will demonstrate a high degree of robustness round costs to ensure we act in customers' best interests.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
South Downs National Park Authority	A4.13	Developing Our Preferred Plan - Groundwater	Support SEW decision not to include new groundwater development. Concerns regarding sustainability of groundwater abstractions across SDNP.	<p>We are pleased that SDNPA supports our approach.</p> <p>We will continue to work with regulators such as the Environment Agency and Natural England to ensure our existing abstractions are sustainable through the NEP programme.</p>	No changes to the plan considered necessary.
Kent Wildlife Trust	G6.2	Developing Our Preferred Plan - Least Cost Modelling	Unclear whether initial least cost modelling incorporated natural capital into economic evaluations. Least cost does not always represent best value to customers when environmental and social factors are taken into account. Wish to see eco-systems approach to analysis and ensure full account is taken of the impact of options on natural capital.	<p>The costing of options within our options appraisal process included environmental and social externalities associated with options alongside the direct and indirect cost implications.</p> <p>Table 7.1 in the dWRMP14 shows Benefits Assessment Guidance was used to identify environmental and social costs and benefits. This is the approach set out by the Environment Agency (et al) in the WRMP Guideline.</p> <p>We excluded options from our preferred plan which we felt were not deliverable either because they would have a significant environmental impact or because they did not increase our resilience. We consulted with a range of stakeholders on the EFG to ensure that options were removed where appropriate.</p> <p>In Appendix 9 of rWRMP14 we include detail of the Environment Agency's National Environment Programme (NEP) that they have asked us to deliver during AMP6 (period 2015 to 2020). The NEP includes a number of catchment management investigations to be completed across our operating area. These investigations will help us to start taken greater account of eco-system approaches to our analysis and understanding of impacts of options on natural capital.</p>	No changes to the plan considered necessary, however we have clarified in rWRMP14 Section 8 that the economic modelling undertaken considered environmental and social cost benefits.



## Appendix 2 - Table 8H - Our Preferred Plan

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Individual	C15.1	Preferred Plan - General Comments	Fully endorse preferred plan. All options proposed by water companies should be supported by Defra.	We welcome this general support for our preferred plan.	Comment noted. No changes to the plan considered necessary.
Wealden District Council	A3.1	Preferred Plan - General Comments	Council welcomes proposals to provide additional water resources in the district. Considers that SEW has undertaken a thorough investigation of existing sources, means of increasing capacity of existing supplies and potential new sources.		
Wealden District Council	A3.7	Preferred Plan - General Comments	SEW are commended for the thoroughness of the optioneering process. Twin track approach is welcomed and supported.		
Rother District Council	A5.2	Preferred Plan - General Comments	The Council is supportive of the twin track approach taken in the WRMP as an effective approach to resource management.		
Ashford Borough Council	A6.1	Preferred Plan - General Comments	Supports SEW's twin track approach in managing supply demand deficit as without these measures new development may be restricted in future. Support the approach taken by SEW in testing resilience of Plan during drought conditions and moving towards a sustainable plan. Welcomes mix of sources and lessening the reliance on groundwater, the predominant source of supply in the LPA area.		
East Sussex County Council	A10.2	Preferred Plan - General Comments	Supportive of increased resilience, sustainability of available water resources, efforts to reduce leakage and promoting water efficiency in the plan.		
East Sussex County Council	A10.3	Preferred Plan - General Comments	Support twin track approach and strategy for monitoring efficacy of measures.		
Kemsing Parish Council	P2.1	Preferred Plan - General Comments	Support proposals in dWRMP14.		



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Ringmer Parish Council	P3.1	Preferred Plan - General Comments	Support proposals in dWRMP14.	We welcome this general support for our preferred plan.	Comment noted. No changes to the plan considered necessary.
Inland Waterways Association, Kent & Sussex Branch	G1.2	Preferred Plan - General Comments	IWA is confident preferred options are acceptable (and less damaging than other potential options).		
Ouse and Adur Rivers Trust	G3.2	Preferred Plan - General Comments	Plan is generally well thought out.		
East Hampshire District Council	A2.2	Preferred Plan - General Comments	Supports plan and acknowledge the need to develop water transfer schemes. Interested in the opportunity with Portsmouth Water. Raises importance of working in partnership with the LPA on various matters, including potential increases in housing numbers.	We welcome this support for our preferred plan. We will continue to engage and work with Planning authorities on a range of issues, including property and population numbers.	Comment noted. No changes to the plan considered necessary.
South Downs National Park Authority	A4.1	Preferred Plan - General Comments	General support for the WRMP subject to issues raised in consultation being addressed in final plan.	Support is welcomed. Issues raised by the South Downs National Park Authority are addressed in this SOR. We remain committed to continued working with the National Park Authority in taking the plan forward.	Comments noted. No changes to the plan considered necessary.
Kent Wildlife Trust	G6.1.1	Preferred Plan - General Comments	Welcome the opportunity for further discussion and consultation on more detailed proposals in due course, to ensure any potential environmental impacts are identified and resolved.	We are committed to working with key stakeholders and interested local organisations as part of taking forward the detailed proposals for individual schemes within the preferred plan. This will ensure potential issues including environmental impacts are identified and fully investigated.	Comment noted. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Natural England	R1.27	Preferred Plan - General Comments	Plan provides evidence that duty to 'further water conservation' has been taken into account and pursued as far as possible rather than increasing supply. Strongly support demand management options in the plan - leakage reduction, metering, water efficiency measures, promotion and awareness.	Support is welcomed especially in respect of our demand management options proposed.	Comment noted. No changes to the plan considered necessary.
Consumer Council for Water	R3.3	Preferred Plan - General Comments	Appears to be an appropriate balance between demand management and resource development.	Confirmation that the plan incorporates the appropriate balance between demand management and resource development is welcomed.	Comment noted. No changes to the plan considered necessary.
East Sussex County Council	A10.9	Preferred Plan - Components of Our Preferred Plan	Ensure any assessments required e.g. landscape, archaeology etc. are taken forward in consideration of options; e.g. potential impact of transfer pipeline Newhaven WwTW to Peacehaven WwTW on SDNP.	Whilst we included environmental and social considerations as part of our initial option appraisal process, we are committed to working with key stakeholders and interested local organisations to take forward the detailed proposals for individual schemes within the preferred plan. This will ensure potential issues, including environmental impacts, are identified and fully investigated.	Clarification has been provided in Statement of Response. We have included in rWRMP14 Section 9 a commitment for further work with stakeholders when we fully assess options during AMP6 (period 2015 to 2020).
Swale Borough Council	A12.5	Preferred Plan - Components of Our Preferred Plan	Ensure that the delivery of these projects includes full environmental appraisal and seek to minimise any impact on landscape, habitats, infrastructure, heritage and environment generally.	Section 9.81 list further studies we propose to undertake in AMP6 (period 2015 to 2020) to ensure careful delivery of strategic schemes across our supply area. This will include consideration of a broad range of environmental and social issues.	
Kent County Council	A14.2	Preferred Plan - Components of Our Preferred Plan	Some good broad support for the WRMP and the preferred plan, although a number of detailed issues raised.	Support is welcomed. We remain committed to continued working with Kent County Council in taking the plan forward.	Comments noted. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA /HRA
Uckfield Town Council	P9.4	Preferred Plan - Components of Our Preferred Plan	Increased abstraction due to growing population. Environment Agency must give assurances that local rivers are not damaged in any way when water is drawn down.	<p>All rivers have been assessed as part of the River Basins Management Plan process by the Environment Agency. As part of the requirements of the Water Framework Directive, Government has made a commitment that rivers will not deteriorate from the assessments made in the original River Basin Management Plan.</p> <p>When undertaking water abstraction feasibility studies, we ensure that any new activities do not bring about the deterioration of status of local water bodies. We also take into account the Environment Agency's National Environment Programme, which highlights any conflicts.</p> <p>In our option appraisal for dWRMPI414, water abstraction issues were considered in the dossiers for each water resource option. If necessary to determine the feasibility of an option, we will undertake specific investigations (for option feasibility) to ensure that specific options will not result in river deterioration (in WFD terms).</p> <p>Since the publication of the dWRMPI4 we have undertaken a Water Framework Directive Assessment for each option and this is provided in the Environmental Report. This assessment includes reference to more recent information available from the Environment Agency on water body status and objectives.</p>	<p>Clarification has been provided in the Statement of Response.</p> <p>The rWRMPI4 Environment Report includes an expanded section on the Water Framework Directive with the supporting individual assessment sheets. These demonstrate the evidence used for the assessment.</p>

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent Wildlife Trust	G6.6	Preferred Plan - Components of Our Preferred Plan	Pleased overall objective of plan recognises the need for sustainable delivery. As proposals for new resources are developed, potential impacts on natural environment should be fully and appropriately assessed and measures proposed to minimise or fully mitigate and compensate for environmental impacts. When evaluating costs, losses or gains, natural capital should form part of the assessment.	<p>We appreciate the value of our natural environment and take our environmental management responsibilities seriously.</p> <p>Our approach to incorporating environmental externalities into option costing and appraisal follows the WRMP guidelines, which use the Benefit Assessment Guidelines (BAG).</p> <p>Section 9.81 sets out further details of the studies we propose to undertake in AMP6 and AMP7 to ensure careful delivery of strategic schemes across our supply area. This will include consideration of a broad range of environmental and social issues.</p>	Clarification has been provided in the Statement of Response and additional information has been added to rWRMP14 Section 9.81.
Kent Wildlife Trust	G6.10	Preferred Plan - Components of Our Preferred Plan	Any major construction scheme must, as well as mitigating impacts, secure significant enhancements for the environment.	Each individual scheme within the preferred plan has specific environmental sensitivities. For this reason, environmental mitigations, and, where necessary environmental enhancement will be developed on a case by case basis. This work will be investigated and developed as part of the feasibility studies which will be undertaken in AMP6. Details of these studies are given in Section 9.81.	Clarification has been provided in the Statement of Response and additional information has been added to rWRMP14 Section 9.81.
Institution of Civil Engineers South East England Water Panel	G8.5	Preferred Plan - Components of Our Preferred Plan	Believe long term sustainability will require active demand management and resource development. Pleased to see that plan incorporates options for trading water identified by WRSE modelling.	Comments noted and we are pleased that the Institution of Civil Engineers supports our approach in this way.	Clarification provided in Statement of Response. No changes to the plan are considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
CPRE Kent	G9.7	Preferred Plan - Components of Our Preferred Plan	Recommend that to improve security of supplies and Levels of Service, bring forward Aylesford Water Re-use to 2015-20. Join with Southern Water to promote Weatherlees as an option for WRMP19. Replace Broad Oak with small bank side storage near little Stour; supporting catchment based development for the Stour; with river abstractions balanced by discharges of treated water into the tidal river. Continue close collaboration with WRSE to promote strategic inter-basin raw water transfers into South East. Review groundwater options with special regard to Medway and Rother headwaters.	<p>We have looked carefully at when we could deliver the Aylesford water re-use scheme. We have reviewed the time required to undertake feasibility studies, water quality assessments and the time needed for construction and we do not believe it is reasonable to construct the scheme in AMP6 (period 2015 to 2020). In particular we expect that environmental studies, including water quality impact assessments, will require several years monitoring. If our studies in AMP6 show that Aylesford can be brought forward, it may be possible to construct it earlier in AMP7 (period 2020 to 2025) than is in our current plan, and we will consider this in our next WRMP.</p> <p>We propose a significant amount of work in AMP6 to understand the environmental impacts of Broad Oak. This will include a range of studies, including a review of benefits of costs and the consideration of alternatives. As part of the East Kent Strategy we will work with Southern Water and Affinity Water to consider options to support Kent, and these will include Weatherlees water re-use. If appropriate we would support the development of a Lower Stour Management scheme, in association with other stakeholders. We suggest this is part of the AMP6 feasibility investigation.</p> <p>As stated in the plan we will continue to work with WRSE for the foreseeable future to ensure that shared resources are utilised, however we have to recognise that there are limitations and companies further afield are forecasting supply demand deficits in the future.</p> <p>We will undertake assessments on proposed groundwater schemes to ensure they do not damage the environment as stated in rWRMP14 Section 9.81.</p>	Clarification has been provided in the Statement of Response and additional information has been added to rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Environment Agency	R2.26a	Preferred Plan - Components of Our Preferred Plan	Improvement 14 - Preferred Plan Should clearly set out least cost plan and explain why deviating from this. Should be clear comparison of the options and solution costs of the least cost plan, the preferred plan and potential alternatives. Unclear how willingness to pay (WTP) findings are consistent with moving away from least cost plan and what WTP information would have persuaded company to follow least-cost plan.	We do recognise that we need to make the commentary round the preferred plan and least cost plan much clearer in the updates to our draft plan. We have revised Section 8 to clarify the process whereby we have progressed from the notional regional least cost plan from the WRSE Group modelling to our preferred plan. Adopting our revised Phase 2 baseline run (Scenario 20) as our preferred plan ensured we had: effectively adopted the 'least cost' plan; taken proper account of customer preferences in terms of options selected; had met the environmental test provided by our SEA; and, selected options from the list of most robust and reliable options available. Our preferred plan does not therefore move away from this 'least cost' plan.	Clarification has been provided in the Statement of Response. Several changes have been made to rWRMP Section 8 to clarify the process followed.
Environment Agency	R2.30a	Preferred Plan - Components of Our Preferred Plan	Improvement 18a - Options Appraisal Process The company has followed an options appraisal process that is in-line with the statutory WRMP process, the WRPG and its underlying methods. In doing this it has acted on the Public Inquiry Inspector's report recommendation.  The company should maintain the level of consultation and transparency throughout the remaining WRMP process and beyond. This should include continuing to recognise stakeholders' concerns and preferences and justifying the company response to any challenge of the options selected in the dWRMP14 in its statement of response.	We welcome the Environment Agency's endorsement of and participation in our appraisal process so far and we look forward to the Environment Agency's active involvement as our consideration of the issues raised continues during AMP6.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Environment Agency	R2.30f	Preferred Plan - Components of Our Preferred Plan	Improvement 18f- Increased abstractions For options involving increase in abstraction within existing abstraction licence the company should take into account potential impact of increasing abstraction and detail any water framework directive implication. Three groundwater options included in preferred plan should be reviewed further:	<p>Risk of Water Framework Directive (WFD) ecological status deterioration from increased abstraction has been reviewed and elaborated further based on more recent WFD water body status information made available by the Environment Agency. We are committed to undertake the option investigation work and to bring in alternative options where investigation shows deterioration of WFD status would result. This is explained in the updated Environmental Report.</p> <p>Testing and investigation forms a component of the groundwater schemes and will be undertaken in AMP6 to ensure the schemes will only proceed if they can be shown to be capable of being operated without causing deterioration of water body status.</p>	Clarification provided in the Statement of Response and further explanation has been added to the updated Environmental Report.
Individual	C22.13	Preferred Plan - Desalination General Comments	Supports desalination at Reculver, but queries why Seasalter, the larger option is not selected?	<p>The representation correctly identifies that there were several desalination schemes identified as options within our dWRMP14 option appraisal process. These were rationalised to a single scheme with the understanding that this would be located on the North Kent Coast with the ultimate location to be determined at a later stage following more detailed investigations during AMP6, which are summarised in rWRMP14 Section 9.81.</p> <p>dWRMP14 Appendix 7E Options DS-4 and DS-5 specifically refer to Seasalter and Faversham as alternative locations to Reculver.</p> <p>We will be undertaking further work to ensure we understand all the issues and costs around desalination as described in rWRMP14 Section 9.81. For desalination we will consider further the environmental and social issues, aim to understand the salinity of the water and the impacts this has on energy use and identify the preferred location.</p>	Clarification provided in the Statement of Response. We have updated rWRMP14 Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
East Sussex County Council	A10.7	Preferred Plan - Desalination General Comments	Concern for impacts desalination option will have on marine environment, which are largely unknown. The likely significant costs to coastal habitats (land take); an increased demand for coastal defences; coastal squeeze and potential impacts of plant discharge are potentially significant effects and should be added to the Non Technical Summary.	The potential impacts on the marine environment from water reuse and desalination schemes have been considered in the Environmental Report and the HRA screening report. There is potential to minimise potential impacts on the marine and coastal environment through detailed siting and design. The options all assume a long sea outfall and the inclusion of brine dispersal technology. For the water re-use schemes, the effluent is currently being discharged from the sewage treatment works to the sea. The option will be subject to further assessment and stakeholder engagement in AMP6. Plans for coastal defences have been reviewed as part of the assessment and will also be taken into account going forward.	Clarification provided in the Statement of Response. We have updated rWRMP14 Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.  An additional section will be added to the Non-Technical Summary document we propose to prepare alongside the final version of WRMP14 once we received Defra approval.
Swale Borough Council	A12.4	Preferred Plan - Desalination General Comments	Ensure the carbon costs of this option are fully explored and renewable energy related to desalination should be fully considered.	Carbon costs were calculated for all our options based on realistic estimates of power consumption.  In particular we will consider further the environmental and social issues and aim to understand the salinity of the water and the impacts this has on energy use.	Clarification provided in the Statement of Response. We have updated rWRMP14 Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Ash Parish Council	PI0.3	Preferred Plan - Desalination General Comments	Desalination, which is very energy intensive, should be resisted.	Our analysis confirms that desalination is more expensive than other options identified. However, for our dWRMP14 desalination was selected as it was preferable to the other options available at that point in the planning period.	Clarification provided in the Statement of Response. We have updated rWRMP14
Individual	C6.2	Preferred Plan - Desalination Reculver	Reculver desalination is too expensive and only really satisfactory for times of high demand.	<p>In the dWRMP14 we proposed that Reculver would be used as a peak scheme at times of high demand. However, in our rWRMP14 a desalination scheme on the North Kent Coast at a location to be determined becomes an alternative scheme rather than being part of our preferred plan.</p> <p>We will be undertaking further work to ensure we understand all the issues and costs around desalination as described in rWRMP14 Section 9.81. In particular we will aim to understand the salinity of the water and the impacts this has on energy use.</p>	Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.
Ashford Borough Council	A6.6	Preferred Plan - Desalination Reculver	Supports this preferred option in principle as drought resilient, but concerns about environmental impacts. Requires that risks of delivery of this option are fully assessed and eliminated or mitigated before reliance is placed on this option.	<p>We appreciate the value of our natural environment and take our environmental management responsibilities seriously.</p> <p>Our approach to incorporating environmental externalities into Option costing and appraisal follow the WRMP guidelines, which use the Benefit Assessment Guidelines (BAG).</p> <p>The potential impacts are addressed in the Environmental Report and the HRA screening report. It is considered there is potential to mitigate these impacts through detailed siting and design.</p> <p>In the dWRMP14 we proposed that Reculver would be used as a peak scheme at times of high demand. However, in our rWRMP14 a desalination scheme on the North Kent Coast at a location to be determined becomes an alternative scheme rather than being part of our preferred plan.</p> <p>We will be undertaking further work to ensure we understand all the issues and costs around desalination as described in rWRMP14 Section 9.81. In particular we will consider further the environmental and social issues, aim to understand the salinity of the water and the impacts this has on energy use and identify the preferred location.</p>	Clarification provided in the Statement of Response. We have updated rWRMP14 Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent County Council	A14.11	Preferred Plan - Desalination Reculver	Notes this option was bottom of customer preferences (Appendix 8) and schemes may conflict with SEA objectives. Notes the important role desalination options can play in enhancing resilience of water supplies and broadly supports option in principle. Requests better understanding of need for scheme and efforts to reduce energy demand. Supports the proposed strategic review with Affinity Water as to whether or not Reculver option should be included in final WRMP.	<p>Our analysis confirms that desalination is more expensive than other possible options identified, and it also featured low on customers' preferences. The scheme was selected as it was preferable to the other options available at that point in the planning period. It is especially suitable as our supply demand balance over the planning period requires a scheme to bridge the deficit during peak demand.</p> <p>In the dWRMP14 we proposed that Reculver would be used as a peak scheme at times of high demand. However, in our rWRMP14 a desalination scheme on the North Kent Coast at a location to be determined becomes an alternative scheme rather than being part of our preferred plan.</p> <p>We will be undertaking further work to ensure we understand all the issues and costs around desalination as described in rWRMP14 Section 9.81. In particular we will consider further the environmental and social issues, aim to understand the salinity of the water and the impacts this has on energy use and identify the preferred location.</p>	Clarification provided in the Statement of Response. We have updated rWRMP14 Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.
Uckfield Town Council	P9.1	Preferred Plan - Desalination Reculver	Understand the need for Reculver desalination plant but this must be the subject to reassurances that the saline waste is disposed of in an environmentally friendly way.	<p>In the dWRMP14 we proposed that Reculver would be used as a peak scheme at times of high demand. However, in our rWRMP14 a desalination scheme on the North Kent Coast at a location to be determined becomes an alternative scheme rather than being part of our preferred plan.</p> <p>We will be undertaking further work to ensure we understand all the issues and costs around desalination as described in rWRMP14 Section 9.81. In particular, we will be carrying out further investigations to consider the environmental and social issues of the abstraction and discharge, aim to understand the salinity of the water and nature of the brine discharge from the works, the impacts this abstraction and discharge has on the environment and energy use, and identify the preferred location.</p>	Clarification provided in the Statement of Response. We have updated rWRMP14 Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Salmon and Trout Association	G4.3	Preferred Plan - Desalination Reculver	Strongly supports Reculver Brackish Water Desalination scheme. Advantages of scheme not fully appreciated. Refutes Reculver is a desalination option as water is not particularly brackish. As such the high costs associated with desalination are much reduced and usual objections to desalination are largely invalid in this case. Reculver should not be considered as the only or preferred abstraction site. Multiple potential sites on Kent coast and series of small borehole abstractions linked to a treatment plant could be preferable. Scheme could have a short lead in time and could be used intermittently. Should be brought forward earlier. Could provide rapid response to extreme climatic conditions. Technique could also be used to utilise water from Eastry Chalk Block.	<p>We welcome the support we have received for this element of our Plan. The scheme was selected, as it was preferable to the other options available at that point in the planning period. It is especially suitable, as our supply demand balance over the planning period requires a scheme to bridge the deficit during peak demand.</p> <p>In the dWRMP14 we proposed that Reculver would be used as a peak scheme at times of high demand. However, in our rWRMP14 a desalination scheme on the North Kent Coast at a location to be determined becomes an alternative scheme rather than being part of our Preferred Plan.</p>	Clarification provided in the Statement of Response. We have updated rWRMP14 Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.
CPRE Kent	G9.5	Preferred Plan - Desalination Reculver	Consider will improve operational flexibility and security of supply and inclusion could improve scope of short term programme. Other sites along north Kent coast would have similar potential.	<p>We will be undertaking further work to ensure we understand all the issues and costs around desalination as described in rWRMP14 Section 9.81. In particular we will consider further the environmental and social issues, aim to understand the salinity of the water and brine discharge and the impacts this has on energy use and identify the preferred location.</p>	
River Stour (Kent) Internal Drainage Board	G5.6	Preferred Plan - Desalination Reculver	Scheme of particular interest to the Board. Further details appreciated in due course.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent Wildlife Trust	G6.18	Preferred Plan - Desalination Reculver	Must be accompanied by stringent assessment of environmental and energy impacts. Concerned about the impact on terrestrial and marine environment of plants at Reculver or Medway - both options need HRA. Need to demonstrate no less damaging alternatives, including better management of existing water resources.	<p>We appreciate the value of our natural environment and take our environmental management responsibilities seriously.</p> <p>Our approach to incorporating environmental externalities into option costing and appraisal follow the WRMP guidelines, which use the Benefit Assessment Guidelines (BAG).</p> <p>The potential impacts are addressed in the Environmental Report and the HRA screening report. It is considered there is potential to mitigate these impacts through detailed siting and design.</p> <p>In the dWRMP14 we proposed that Reculver would be used as a peak scheme at times of high demand. However, in our rWRMP14 a desalination scheme on the North Kent Coast at a location to be determined becomes an alternative scheme rather than being part of our preferred plan.</p> <p>We will be undertaking further work to ensure we understand all the issues and costs around desalination as described in rWRMP14 Section 9.81. In particular we will consider further the environmental and social issues, aim to understand the salinity of the water and the impacts this has on energy use and identify the preferred location.</p>	Clarification provided in the Statement of Response. We have updated rWRMP14 Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.
Environment Agency	R2.30c	Preferred Plan - Desalination Reculver	Improvement 18c – Reculver Desalination The company should provide further explanation about Reculver desalination option, how it has been considered in the SEA and whether it is a suitable alternative option. It is not clear whether it should be considered as an alternative option. We also note that desalination comes last in customers' preferences.	<p>In the dWRMP14 we proposed that Reculver would be used as a peak scheme at times of high demand. However, in our rWRMP14 a desalination scheme on the North Kent Coast at a location to be determined becomes an alternative scheme rather than being part of our preferred plan.</p> <p>We will be undertaking further work to ensure we understand all the issues and costs around desalination as described in rWRMP14 Section 9.81.</p>	Clarification provided in the Statement of Response. We have updated rWRMP14 Section 9 to reflect the changing status of desalination within our Preferred Plan and additional detail is provided in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Surrey County Council	A8.4	Preferred Plan - Groundwater Boxall's Lane	Raises concerns about Boxall's Lane groundwater option, and requests further clarification of proposals to ensure potential environmental impacts are properly managed.	<p>We appreciate the value of our natural environment and take our environmental management responsibilities seriously.</p> <p>Our approach to incorporating environmental externalities into option costing and appraisal follow the WRMP guidelines, which use the Benefit Assessment Guidelines (BAG).</p> <p>Potential impacts from Boxall's Lane have been raised by other representations and more recent discussions with the Environment Agency.</p> <p>Further assessments will be undertaken on the impacts of groundwater schemes on river flows and WFD objectives prior to implementation and with agreement from the Environment Agency and other stakeholders.</p> <p>We will not commission the works at Boxall's Lane until these studies have been done, as set out in rWRMP14 Section 9.81, and stakeholders, including the Environment Agency, are satisfied that there are no unacceptable environmental impacts.</p> <p>However, our initial assessment suggests there will not be an unacceptable environmental impact arising from our Boxall's Lane scheme.</p>	<p>Clarification provided in the Statement of Response.</p> <p>Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.</p>

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/ SEA /HRA
Wealden District Council	A3.5	Preferred Plan - Groundwater Cowbeech	<p>Proposal lies within the High Weald AONB and main concern is the potential visual impact that the water treatment works and high level pumps will have on the surrounding area.</p> <p>Other potential impacts are expected through increased traffic during construction, which can be appropriately addressed. Council would welcome a detailed programme from South East Water with regards to their promotion of the scheme and associated construction processes within the area, showing how and when the local authority, affected local parish councils and local communities will be engaged and consulted.</p>	<p>The existing infrastructure for Cowbeech is located within the AONB. The option is assessed in the Environmental Report taking account of its use of existing infrastructure and that additional treatment works will be small in scale and located within the current site. Mitigation includes consideration of visual impacts on the AONB as part of the design,</p> <p>We are committed to working with key stakeholders and interested local organisations as part of taking forward the detailed proposals for individual scheme within the preferred plan. This will ensure potential issues including environmental impacts are identified and fully investigated. This will include consideration of construction traffic impacts.</p>	<p>Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.8I.</p>
Wealden District Council	A3.6	Preferred Plan - Groundwater Forest Row	<p>Predominant concern is the potential impact upon the Ashdown Forest. The Council welcomes the further Habitat Regulations Assessment suggested by South East Water in order to confirm their assumptions that the proposals will not impact upon the Ashdown Forest. The Council would welcome further engagement with South East Water and Natural England in any further Habitat Regulation Assessment work undertaken. Would welcome a detailed programme showing how and when the local authority, affected local parish councils and local communities will be engaged and consulted.</p>	<p>The potential impact of additional abstraction at Forest Row has been considered as part of the HRA screening and as reported in the HRA Screening report, has not been identified as having a likely significant effect on the Ashdown Forest Natura 2000 designation interests. This was based on consideration of the hydraulic connection, topography and groundwater flow. The current abstraction has not been identified in the review of consents as potentially causing impacts on Natura 2000 designations. The Ashdown Forest is south of the abstraction and across a valley, while ground water flow is to the north. The aquifer in the area of abstraction site is also locally confined and unlikely to have an effect on nearby surface features.</p> <p>It is recognised that the proposed abstraction will need to be investigated further and, as part of this, potential impacts on WFD water body status and local concerns will be addressed.</p> <p>We are committed to working with key stakeholders and interested local organisations as part of taking forward the detailed proposals.</p>	<p>Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.8I.</p>

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Forest Row Parish Council	PI1.1	Preferred Plan - Groundwater Forest Row	No information to indicate level and scale of development proposed. No indication as to whether the increased abstraction will impact on existing natural recharge of the aquifer or whether artificial means of recharge may additionally be required. Concerned that insufficient data to understand the impact on local groundwater percolation routes, spring line and water table levels within Forest Row village itself. Potential risk to local properties from heave and/or subsidence. Some properties in village already reported adverse effects from recent changes in groundwater levels/direction. If data is not available ask that a full hydro-geological survey pertaining to local groundwater within Forest Row is conducted by SEW and the results made publically available in order to reassure the individual property owners they will be unaffected by the proposals. This should be undertaken in collaboration with the Local Lead Flood Authority and East Sussex County Council who are preparing a Water Management Plan for Forest Row, which includes addressing flood risk from surface water and groundwater.	<p>We appreciate the value of our natural environment and take our environmental management responsibilities seriously.</p> <p>Our approach to incorporating environmental externalities into option costing and appraisal follow the WRMP guidelines, which use the Benefit Assessment Guidelines (BAG).</p> <p>Potential impacts at Forest Row have been raised in recent discussions with the Environment Agency.</p> <p>Further assessments will be undertaken on the impacts of groundwater schemes on river flows and WFD objectives prior to implementation and with agreement from the Environment Agency and other stakeholders. This is likely to include a water features survey, review of the hydrogeology of the aquifer unit and liaison with local property owners. We will not commission the works until these studies have been done, as set out in rWRMP14 Section 9.81 and stakeholders, including the Environment Agency, are satisfied that there are no unacceptable environmental impacts.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Individual	C15.4	Preferred Plan - Groundwater General	Supports groundwater but notes reliance on rainfall to keep up levels.	In developing our preferred plan we have made a conscious decision to: choose options designed to improve resilience through increasing the mix of sources available to us; and, as part of our modelling process constrain the amount of new groundwater options chosen. Those preferred groundwater options included in the plan are restricted to those we have studied in the past as drought options or those which can be delivered without significant environmental impact.	Clarification in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Individual	C22.9	Preferred Plan - Groundwater General	New groundwater should be deferred, unless developed without environmental damage. Should use Abstraction Incentive Mechanism (AIM).	<p>We appreciate the value of our natural environment and take our environmental management responsibilities seriously.</p> <p>In developing our preferred plan we have made a conscious decision to: choose options designed to improve resilience through increasing the mix of sources available to us; and, as part of our modelling process constrain the amount of new groundwater options chosen. Those preferred groundwater options included in the plan are restricted to those we have studied in the past as drought options or those which can be delivered without significant environmental impact.</p> <p>Further assessments will be undertaken on the impacts of groundwater schemes on river flows and Water Framework Directive (WFD) objectives prior to implementation and with agreement from the Environment Agency and other stakeholders.</p> <p>We have been working with the Environment Agency and Ofwat to support the development of AIM. Although it has not been possible to apply AIM as originally envisaged due to the quality of data available, we are waiting for clarification of how this will be applied in AMP6 (period 2015 to 2020) and will fully comply with the structure set by our regulators.</p> <p>We are pursuing the wider environmental objectives of AIM to reduce the environmental impacts resulting from abstraction, through our National Environment Programme (NEP) and WFD programmes and investigations.</p>	Clarification in the Statement of Response. No changes to the plan considered necessary.



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
East Sussex County Council	A10.5	Preferred Plan - Groundwater General	General queries over amount of groundwater available and long term risk of abstraction licences to be modified due to environmental change. Requests to be consulted on groundwater options once full details are available and minimise potential impacts to the environment, heritage and the wider landscape.	<p>The Water White Paper and subsequently Defra have communicated the intention to reform the Abstraction Licensing system from the 2020s. We have fed into and contributed towards this policy development process.</p> <p>We carefully monitor the groundwater levels in the aquifers across our region to ensure a reliable public water supply.</p> <p>Assessments on the impacts of groundwater schemes on river flows and WFD objectives will be undertaken prior to implementation and with agreement from the Environment Agency and other stakeholders. Dossiers containing more information about the options considered as part of our WRMP process are available in hard copy for public viewing at South East Water's head office in Snodland, Kent.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.8I.
Kent Wildlife Trust	G6.12	Preferred Plan - Groundwater General	Concerned about the impact of abstraction from new groundwater sources on nearby valued habitats. Two wildlife sites within vicinity of Maytham Farm, which could be adversely affected by changes in hydrology. Recently confirmed that abstraction is having an impact on H&LOWWT's Greywell Fen. Should be acknowledged that abstraction can damage the environment even after prolonged heavy rain. Can have negative effect even at times of high groundwater. A full assessment of the impact of new or increased groundwater abstraction on surrounding biodiversity must be carried out and demonstrate proposals would not cause any deterioration in WFD status of local water bodies. Particularly concerned about existing abstractions on chalk streams.	<p>We appreciate the value of our natural environment and take our environmental management responsibilities seriously. We work with Natural England and the Environment Agency on our NEP programme.</p> <p>Although the Maytham Farm sources are not related to chalk streams, potential impacts from these sources have been raised by other representations and more recent discussions with the Environment Agency.</p> <p>Further assessments will be undertaken on the impacts of groundwater schemes on river flows and Water Framework Directive (WFD) objectives prior to implementation and with agreement from the Environment Agency and other stakeholders.</p> <p>We will not commission the works at Maytham Farm until these studies have been done, as set out in rWRMP14 Section 9.8I and Stakeholders, including the Environment Agency, are satisfied that there are no unacceptable environmental impacts.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.8I.

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Environment Agency	R2.30g	Preferred Plan – Groundwater General	Improvement 18g- Groundwater Options Three groundwater options are included in the preferred plan; though the Environment Agency had indicated an additional level of risk might exist around them (ref. WRSE group work; 'red list'). These options were not considered unacceptable, but other options might be preferable. The company should review the three options further.	The groundwater options in the preferred plan have been reviewed further and the results of the review are provided in the updated Environmental Report. We have considered all the preferred plan options against the SEA water objectives and plan level Water Framework Directive (WFD) assessment. The assessment covered possible alternative groundwater options and other options. All these schemes were assessed against no deterioration to surface water and groundwater and potential conflict or promotion of RBMP objectives. The schemes were found to be either compliant or uncertain and specific further investigation requirements and potential mitigation have been identified. These findings are detailed in a summary table included in the updated Environmental Report. We are committed to undertake the investigations identified and to carry them out to ensure sufficient time to bring forward alternative options in the event that the option was found likely to cause ecological status or potential deterioration to a WFD water body.	We have included additional text in the updated Environmental Report.
Rother District Council	A5.5	Preferred Plan - Leakage	The Council is supportive of the strategy to introduce a robust leakage prevention programme. However a, faster pace of leakage reduction is requested and support is given to the implementation of the strategy earlier in the Plan period.	Our approach to leakage reduction and leakage economics is consistent with guidelines. Where leakage has been selected it has generally been because it is economic to do so.  Leakage options have the advantage that they can be implemented relatively quickly, and as a result provide flexibility. In a small number of cases, at the start of the plan, leakage options have been selected because of their ability to meet early deficits in the supply demand balance. In accordance with the WRMP Guideline we have not allowed leakage to rise during the plan, so once an option is selected, it is included throughout the plan.  Customers have expressed a preference for leakage beyond any other option, but have indicated they are not prepared to pay increased bills and so our approach to leakage (selecting it where it is economic to do so, or it is necessary to meet levels of service) is consistent with customers' expectations.  We are committed to continued review of our Sustainable Economic Level of Leakage (SELL) assessments in AMP6 (period 2015 to 2020) consistent with recently published guidance, and will undertake further economic analysis prior to the publication of our next WRMP.	Clarification in the Statement of Response. No changes to the plan considered necessary.

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Surrey County Council	A8.3	Preferred Plan - Leakage	Welcomes the measures/targets proposed but requests more information on measures to identify and improve response rates and repair times during leakage incidents.	<p>Leakage is broadly of two types: sudden bursts which can cause damage and disruption; and, smaller leaks which are difficult to find and take longer, but do not cause damage and do not risk customers' supplies. The following information is published on our website.</p> <p>"Our investigation and repair will be processed automatically when we receive your form. We aim to repair 90% of large leaks within two days, and often they are fixed even more quickly. For smaller leaks we aim to repair them within seven days, although this can be longer if the water is leaking from pipework that doesn't belong to South East Water".</p>	Clarification in the Statement of Response. No changes to the plan considered necessary.
Dartford Borough Council	A13.4	Preferred Plan - Leakage	The Council supports leakage reduction and water metering measures but seeks assurance that operations should be carefully planned to avoid or minimise disruption to the local community during installation and repairs.	<p>We welcome the Council's support of our metering and leakage policies and would like to give assurance that we make every possible effort to minimise the disruption for the communities we operate in.</p> <p>More information on how we minimise disruption is available on our website at: <a href="http://www.makeeverydropcount.co.uk/information.php">http://www.makeeverydropcount.co.uk/information.php</a></p>	Clarification in the Statement of Response. No changes to the plan considered necessary.

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Kent County Council	A14.7	Preferred Plan - Leakage	Welcomes further decrease but not convinced that 2% total cost assigned to leakage reduction adequately reflects the importance that customers attribute to leakage reduction.	Our approach to leakage reduction and leakage economics is consistent with guidelines. Where leakage has been selected it has generally been because it is economic to do so.	We have clarified in rWRMP14 Sections 4, 8 and 9 our approach to leakage and the reduction in leakage we have incorporated into our preferred plan.
River Stour (Kent) Internal Drainage Board	G5.2	Preferred Plan - Leakage	Overall leakage of 10% in the longer term is not considered to be ambitious enough, even if customer research indicates this acceptable.	<p>Leakage options have the advantage that they can be implemented relatively quickly, and as a result provide flexibility. In a small number of cases, at the start of the plan, leakage options have been selected because of their ability to meet early deficits in the supply demand balance. In accordance with the WRMP Guideline we have not allowed leakage to rise during the plan, so once an option is selected, it is included throughout the plan.</p> <p>Customers have expressed a preference for leakage beyond any other option, but have indicated they are not prepared to pay increased bills and so our approach to leakage (selecting it where it is economic to do so, or it is necessary to meet levels of service) is consistent with customers' expectations.</p> <p>We have clarified our approach to leakage in rWRMP14 Sections 4, 8 and 9.</p>	We have clarified in rWRMP14 Sections 4, 8 and 9 our approach to leakage and the reduction in leakage we have incorporated into our preferred plan.
Kent Downs AONB Unit	G7.6	Preferred Plan - Leakage	Support aggressive leakage management.	Our consultation confirmed that customers support our plan to maintain the SELL of 10%. We believe this to be an ambitious target based on robust analysis. Notwithstanding the results of our analysis we will continue to consider further leakage reductions in the future should cheaper approaches to reduce leakage become available or customers indicate that we should reduce leakage further.	Clarification in the Statement of Response. No changes to the plan considered necessary.

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Institution of Civil Engineers South East England Water Panel	G8.12	Preferred Plan - Leakage	Approach to reducing leakage is sensible and there should be good reason to pursue lower levels of leakage. Some WRZs have preferred options to reduce leakage below target levels. This needs to be justified.	<p>Our approach to leakage reduction and leakage economics is consistent with guidelines. Where leakage has been selected it has generally been because it is economic to do so.</p> <p>Leakage options have the advantage that they can be implemented relatively quickly, and as a result provide flexibility. In a small number of cases, at the start of the plan, leakage options have been selected because of their ability to meet early deficits in the supply demand balance. In accordance with the WRMP Guideline we have not allowed leakage to rise during the plan, so once an option is selected, it is included throughout the plan.</p> <p>Customers have expressed a preference for leakage beyond any other option, but have indicated they are not prepared to pay increased bills and so our approach to leakage (selecting it where it is economic to do so, or it is necessary to meet levels of service) is consistent with customers' expectations.</p>	Clarification in the Statement of Response. No changes to the plan considered necessary.
Individual	C22.7	Preferred Plan - Leakage	Leakage should be top priority for the company. Disagree that 10% will be achieved by 2040 - 3% should not be added for customer side leakage. Long Range Marginal Cost should be applied carefully to reflect full potential costs of implementing new supply or alternative demand management options. Should be proper installation of pipes to ensure minimal/no leakage- contractual arrangements/auditing to ensure this.	<p>Our strategy is initially demand led, with metering, leakage and water efficiency being the key components of our rWRMP14. This is then followed by making better use of our existing sources and finally new water resource development.</p> <p>Our leakage calculations follow industry guidelines and although we consider 10% a challenging target we believe it can be met.</p> <p>Customer leakage on supply pipes is the responsibility of customers whether a property is metered or not. Although having a meter will help us identify leakage and leakage should be lower than in an unmeasured property it will not eradicate it completely. We have correctly included reductions on supply pipe leakage as part of our leakage assessment in accordance with industry guidelines.</p>	Clarification in the Statement of Response. No changes to the plan considered necessary.

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South Downs National Park Authority	A4.14	Preferred Plan - Leakage	Support measures in the preferred Plan to reduce leakage further.	We welcome this support for our preferred plan.	Comment is support for our preferred plan. No changes to the plan considered necessary.
Uckfield Town Council	P9.2	Preferred Plan - Leakage	Leaks in pipes should be attended to and target of 5% achieved. A target of 2% is achievable, but prohibitively expensive. Should be financed by profits, not increased charges to consumers.	Our consultation confirmed that customers support our plan to maintain the sustainable economic level of leakage (SELL) of 10%. We believe this to be an ambitious target based on robust analysis. Notwithstanding the results of our analysis we will continue to consider further leakage reductions in the future should cheaper approaches to reduce leakage become available or customers indicate that we should reduce leakage further.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Ouse and Adur Rivers Trust	G3.3	Preferred Plan - Leakage	Target of 17% by 2020 could be improved upon with extra investment.	<p>dWRMP14 Section 8 explains that as part of our water resources planning we have to ensure that (as a minimum) we operate at the sustainable economic level of leakage (SELL). Our modelling is consistent with industry guidelines and ensures that options to reduce leakage are included. To be consistent with the WRSE modelling we have included an additional constraint in our modelling which means that once a leakage scheme is implemented it cannot then be 'turned off', which means that there will be periods where we are operating below the SELL.</p> <p>Our consultation showed that customers preferred leakage reduction above other options but the willingness to pay was not statistically significant and customers were not willing to have an increase in bills to reduce leakage below the SELL. We did not therefore incorporate any willingness to pay in our calculation of the SELL.</p> <p>We will continue to consider further leakage reductions in the future should cheaper approaches to reduce leakage become available or customers indicate that we should reduce leakage further.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

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Individual	C23.1	Preferred Plan - Reservoirs - Arlington	<p>Object to the proposals on the following grounds.</p> <p>Substantial loss of agricultural land just outside two substantial towns and their conurbations.</p> <p>Loss of such land would have significant negative effect on DA Vine Farms Ltd.</p> <p>Significant loss to the family who have been owners of the affected land for around 200 years.</p> <p>Compensation to the family would be the same as a typical everyday purchaser with no regard to legacy or heritage. Likewise, replacement of the land lost which adjoins to their current landholding would be priced higher than market price resulting in a considerable loss should they opt to replace it.</p> <p>If unable to purchase appropriate land within three years, Capital Gains Tax and "roll over" provisions would be lost to the family. Sessingham Farmhouse is prejudiced or blighted whilst proposals in public domain to extend the reservoir.</p> <p>Public access to the sites will have a knock on effect of the public assuming access to the adjoining farmland, which will be unwelcomed by the farmer.</p> <p>Loss of particular land could change nature of farming activities i.e. restricting activities in proximity to a reservoir.</p> <p>The creation of the original reservoir resulted in the Vine family incurring considerable financial costs that they should not have to go through again.</p>	<p>We have undertaken a thorough and comprehensive optioneering process in considering potential suitable sites for surface water reservoirs across our supply area. This process, including a consideration of potential environmental effects as part of the SEA process and Habitats Regulations Assessment, is fully explained in sections 7 and 8 and corresponding appendices 7 and 8 of the dWRMP14. The preferred option of extending the existing reservoir at Arlington through the construction of a new bunded reservoir on adjacent land to the north of the existing site is a more acceptable option than other options considered.</p> <p>Subsequent to the publication of our dWRMP14 we have met with the landowner and have a good understanding of his concerns and views regarding our proposal. We intend to complete further investigations in AMP6 as set out in rWRMP14 Section 9.81 that will enable us to address the concerns raised.</p> <p>It is accepted that the land under consideration would result in the loss of productive agricultural land, and our initial work has highlighted a number of other on-site issues, such as the existing overhead power lines. Our work in developing the preferred plan also concluded that this option offers potential long term positive biodiversity, landscape and recreational benefits which provide additional value with the existing adjacent reservoir. The creation of additional winter water storage can positively contribute to a greater security of supply and to climate change resilience.</p> <p>Given the long lead in time for the development of a reservoir option, we consider that the opportunity to undertake surveys and assessment work to fully understand additional (and as yet unknown) constraints should be undertaken during the 2015 to 2020 period. This will include further discussions with the landowners and options for compensation. We would like to fully explore how the constraints to delivery of this option can be overcome during the next AMP period.</p>	<p>Clarification provided in the Statement of Response. No changes to the plan considered necessary.</p> <p>Clarification provided in the Statement of Response.</p> <p>Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.</p> <p>This will include a further assessment of the Arlington Reservoir option during the next AMP period, including the issues of financial loss and compensation raised by the landowner.</p>

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Wealden District Council	A3.4	Preferred Plan - Reservoirs - Arlington	Requests working closely with SEW towards more detailed development of options and taking through planning process, including policies and safeguarding site for Arlington. Review of Local Plan anticipated during 2015.	<p>We would welcome closer working with Wealden District Council in respect of the Arlington extension option and how a suitable site to deliver this option can be safeguarded through the planning process. rWRMP14 Section 9.81 sets out further details of the studies we propose to undertake in AMP6 and AMP7 to ensure careful delivery of strategic schemes including Arlington. This will include consideration of a broad range of environmental and social issues and we look forward to working with Wealden District Council on these further studies.</p> <p>In time, we propose to set up stakeholder groups to ensure the scheme is delivered appropriately and that opportunities exist to agree positive benefits and overall approach.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
South Downs National Park Authority	A4.18	Preferred Plan - Reservoirs - Arlington	Acknowledge the option, request to be fully consulted from the early stages of scheme development. Some concerns about potential impacts on landscape character and visual envelope.	<p>rWRMP14 Section 9.81 sets out further details of the studies we propose to undertake in AMP6 and AMP7 to ensure careful delivery of strategic schemes including Arlington. This will include consideration of potential visual impacts on the landscape and the opportunity to identify any other environmental effects. We look forward to working with the South Downs National Park Authority on these further studies.</p> <p>In time, we propose to set up stakeholder groups to ensure the scheme is delivered appropriately and that opportunities exist to agree positive benefits and overall approach.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.



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Lewes District Council	A7.6	Preferred Plan - Reservoirs - Arlington	Option is welcomed and supported as most acceptable option in locality. Concerns about long term in combination effects with Peacehaven water re-use scheme in terms of water quality status due to abstractions from River Ouse, taking account of operational management of new reservoir; fish migration and timing.	<p>Support is welcomed. Section 9.81 sets out further details of the studies we propose to undertake in AMP6 and AMP7 to ensure careful delivery of strategic schemes including Arlington. This will include environmental effects of combined impacts of water re-use at Peacehaven and an extension to Arlington reservoir on a broad range of environmental and social issues and we look forward to working with Lewes District Council on these further studies.</p> <p>In time, we propose to set up stakeholder groups to ensure the scheme is delivered appropriately and that opportunities exist to agree positive benefits and overall approach.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
East Sussex County Council	A10.6	Preferred Plan - Reservoirs - Arlington	Wishes to be consulted during future investigation of option, sees option as a logical step to improving water supplies. Must be fully consulted to ensure concerns are addressed and negative impacts minimised.	<p>Given the long lead in time for the development of a reservoir option, we consider that the opportunity to undertake surveys and assessment work to fully understand additional (and as yet unknown) constraints and potential adverse impacts should be undertaken during the 2015 to 2020 period. This is set out in rWRMP14 Section 9.81. We look forward to working with East Sussex County Council on these further studies.</p> <p>In time, we propose to set up stakeholder groups to ensure the scheme is delivered appropriately and that opportunities exist to agree positive benefits and overall approach.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Arlington Parish Council	P4.1	Preferred Plan - Reservoirs - Arlington	Generally approve of dWRMP14. Request that if pylons need to be removed for the extension of Arlington reservoir that these are sited underground.	We welcome this support for our preferred plan. Given the long lead in time for the development of a reservoir option, we consider that the opportunity to undertake surveys and assessment work to fully understand additional (and as yet unknown) constraints should be undertaken during the 2015 to 2020 period. This is set out in Section 9.81 of our rWRMP14. The possibility of siting the pylons underground and possible routes can be considered further during AMP6 investigation work.	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.

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Berwick Parish Council	P5.1	Preferred Plan - Reservoirs - Arlington	No objections regarding proposed extension to Arlington Reservoir.	We welcome this support for our preferred plan.	No changes to the plan considered necessary.
Natural England	R1.12	Preferred Plan - Reservoirs - Arlington	New Arlington Reservoir: Mitigation proposed is appropriate to protect birds from disturbance during construction. Mitigation measures to avoid disturbance to the SSSI birds will significantly constrain the construction window and this constraint should be built into the timing of the reservoir construction. New reservoir presents a significant opportunity to enhance habitat for wintering and passage species. Significant opportunities to include habitats for wider biodiversity enhancement in the design, in addition to protection and enhancement of the SSSI. These are identified in the dWRMP14.	<p>We welcome confirmation that our mitigation is appropriate and appreciate the significant opportunities for habitat creation provided by the preferred option. Given the long lead in time for the development of a reservoir option, we consider that the opportunity to undertake surveys and assessment work to fully understand (and as yet unknown) constraints and opportunities should be undertaken during the 2015 to 2020 period. This is set out in Section 9.81 of our rWRMP14.</p> <p>In time, we propose to set up stakeholder groups to ensure the scheme is delivered appropriately and that opportunities exist to agree positive benefits and overall approach.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Individual	C6.1	Preferred Plan - Reservoirs - Broad Oak	Approves of the scheme. Suggests that the scheme is the most cost effective way of meeting the need for future water supplies, and that the sooner the reservoir is constructed the better.	We welcome this support for the Broad Oak scheme.	No changes to the plan considered necessary.

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Individual	C9.4	Preferred Plan - Reservoirs - Broad Oak	Stour has inadequate fresh water at Pegwell Bay. No reference in the plan to how this matter is to be resolved. dWRMP14 does not address the current poor ecological state of the Stour mud flats caused by present low water levels in the Stour; before water abstraction rates are increased. Plan unacceptable in so far as the proposals for East Kent are concerned.	<p>The abstraction to fill Broad Oak from the Stour would only occur under high flow conditions when there is sufficient water in the river.</p> <p>We propose a significant amount of work in AMP6 to understand the environmental impacts of Broad Oak. This will include a range of studies and will consider alternatives to Broad Oak and review the benefits and costs. As part of the East Kent Strategy we will work with Southern Water and Affinity Water to consider options to support Kent, and these will include water re-use. If appropriate we would support the development of a Lower Stour Management Scheme, in association with other stakeholders. We suggest this is part of the AMP6 feasibility investigation set out in rWRMP14 Section 9.81.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Individual	C22.11	Preferred Plan - Reservoirs - Broad Oak	Oppose Broad Oak. Unclear what has been included in the costings (should include consequential costs). Weatherlees re-use required before Broad Oak and additional abstraction at Plucks Gutter utilised without requiring Broad Oak.	<p>We have interpreted the term consequential costs to mean environmental and social costs.</p> <p>The costing and economic modelling undertaken by ourselves and WRSE considered a range of costs and benefits, including initial construction costs, environmental and social costs and benefits (including carbon), capital maintenance and operational costs.</p> <p>We propose a significant amount of work in AMP6 to understand all the impacts of Broad Oak. This will include a range of studies and will consider alternatives to Broad Oak and review the benefits and costs. As part of the East Kent Strategy we will work with Southern Water and Affinity Water to consider options to support Kent, and these will include water re-use. This is part of the AMP6 feasibility investigation set out in rWRMP14 Section 9.81.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.

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Ashford Borough Council	A6.5	Preferred Plan - Reservoirs - Broad Oak	Should it be found that Broad Oak is needed, then the Council is, in principle, broadly supportive and welcomes a proposal of a reduced scale to avoid SSSI land take. Would like to be more involved with process, including more information on the delivery process, likely costs and who will be consulted.	<p>We would welcome Ashford Borough Council to be an integral part of the stakeholder process of investigating the feasibility of Broad Oak and look forward to working with the Council on the further studies for this option.</p> <p>In AMP6 we will work with stakeholders to confirm the feasibility of a proposed reservoir at Broad Oak and increase our understanding of environmental constraints, including potential adverse impact and the benefits the preferred option could offer. Broad Oak, as proposed, met the minimum design requirements in terms of depth and measures for maintaining reservoir water quality have been allowed for in the option costs. In general this reduced footprint, which avoids direct loss of SSSI and with the potential for significant impact mitigation and biodiversity enhancement, has been welcomed by Natural England.</p> <p>We are committed to undertaking further study of the environmental impacts of a proposed Broad Oak reservoir in the next AMP6 period to determine its feasibility alongside further environmental assessment as set out in rWRMP14 Section 9.81.</p> <p>In time, we propose to set up stakeholder groups to ensure the scheme is delivered appropriately and that opportunities exist to agree positive benefits and overall approach.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Canterbury City Council	A9.1	Preferred Plan - Reservoirs - Broad Oak	Notes that a smaller site has been selected as a preferred option and refers to draft Local Plan. Desire to be involved in process in the justification of need, location and potential options as well as assessment of impacts. Lists detailed issues/impacts to be considered including transport and traffic; landscape; designated international and national sites of nature conservation; detailed design; consideration of the listed building (farmhouse); archaeology; residential amenity and issues arising from pipeline route to Plucks Gutter.	<p>We would welcome Canterbury City Council to be an integral part of the Stakeholder process and look forward to working with the Council on the further studies for this option.</p> <p>In AMP6 we will work with stakeholders to confirm the feasibility of a proposed reservoir at Broad Oak and increase our understanding of environmental constraints, including potential adverse impact and the benefits the preferred option could offer. Broad Oak, as proposed, met the minimum design requirements in terms of depth and measures for maintaining reservoir water quality have been allowed for in the option costs. In general this reduced footprint, which avoids direct loss of SSSI and with the potential for significant impact mitigation and biodiversity enhancement, has been welcomed by Natural England.</p> <p>We are committed to undertaking further study of the environmental impacts of a proposed Broad Oak reservoir in the next AMP6 period as set out in rWRMP Section 9.81 to determine its feasibility alongside further environmental assessment.</p> <p>In time, we propose to set up stakeholder groups to ensure the scheme is delivered appropriately and that opportunities exist to agree positive benefits and overall approach.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Canterbury City Council	A9.2	Preferred Plan - Reservoirs - Broad Oak	Suggests that Broad Oak in conflict with SEA and customer preferences as presented in Appendix 8.	<p>We have explained how our plan is the best value plan taking into account economic costs, risk, resilience environmental and social costs and stakeholder preferences.</p> <p>dWRMP14 Appendix 8 and the Environmental Report identify where Broad Oak could lead to potential conflicts with some SEA objectives but also note that there is scope to mitigate these. They also report where Broad Oak has potential to provide for long term benefits contributing to SEA objectives. This assessment is supported by comments received from Natural England. We are committed to undertaking further study of the environmental impacts in the next AMP6 period as set out in rWRMP14 Section 9.81.</p> <p>Although generally customers preferred alternative water resource options, this reservoir scheme was selected as the best value scheme available at this time. Comments received from the local community and through local engagement have been largely supportive of the scheme.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Canterbury City Council	A9.3	Preferred Plan - Reservoirs - Broad Oak	Council wishes to be involved in the proposed East Kent Strategy to review options and in particular the role Broad Oak may play.	We would welcome Canterbury City Council to be an integral part of the East Kent Strategy Stakeholder process and will contact the Council in due course to agree arrangements.	No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent County Council	A14.12	Preferred Plan - Reservoirs - Broad Oak	Notes this option was not selected in WRSE modelling runs, was bottom of customer preferences (Appendix 8) and schemes would conflict with SEA objectives. Supports strategic review of options in East Kent and should consider Broad Oak as part of this review.	<p>We have explained how our plan is the best value plan taking into account economic costs, risk, resilience environmental and social costs and stakeholder preferences.</p> <p>Within the WRSE modelling Broad Oak was not one of the core options, and this is because groundwater schemes were available. These were later ruled out of our own assessment on the basis of our objective of reducing our dependence on groundwater in order to improve the resilience of our water supply.</p> <p>dWRMP14 Appendix 8 and the Environmental Report identify where Broad Oak could lead to potential conflicts with some SEA objectives but also note that there is scope to mitigate these. They also report where Broad Oak has potential to provide for long term benefits contributing to SEA objectives. This assessment is supported by comments received from Natural England. We are committed to undertaking further study of the environmental impacts in the next AMP6 period. Customer preferences for types of option indicate new reservoirs are second from the bottom of the list. Comments received from the local community and through local engagement have been largely supportive of the scheme.</p> <p>Ahead of finalising rWRMP14 the WRSE Group completed a final Phase 3 of modelling (September and October 2013) that validated the WRSE Group water companies' dWRMP14 preferred plans.</p> <p>Phase 3 confirmed that our preferred plan remains consistent with the outcomes from regional work. A summary of the WRSE Group Phase 3 findings is included in rWRMP14, Appendix 9.</p>	Clarification provided in the Statement of Response. Further information on WRSE Phase 3 modelling included in rWRMP14 Appendix 9.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Sturry Parish Council	P6.1	Preferred Plan - Reservoirs - Broad Oak	Does not object to dWRMP14. Welcome potential economic and social benefits that could result from a new reservoir at Broad Oak as well as wider benefits in terms of water supply. Provided ecology and ancient woodland is preserved when reservoir is created, Parish Council feels it would be great addition to the area.	Support for the plan welcomed and recognition of the potential economic and social benefits of a new reservoir at Broad Oak. We are committed to undertaking further study of the environmental impacts of a proposed Broad Oak reservoir in AMP6, as set out in rWRMP14 Section 9.81, to determine its feasibility alongside further environmental assessment. The potential for significant impact mitigation and biodiversity enhancement was identified in the preparation of dWRMP14 and additional information on the potential enhancements is included in the updated Environmental Report.	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Downswood Parish Council	P8.3	Preferred Plan - Reservoirs - Broad Oak	Potential for Broad Oak to be same asset and tourist attraction that Bewl Water is.	We welcome this support for the Broad Oak scheme. The next steps will be for further investigations to be undertaken during the AMP6 period to inform detailed studies for the reservoir. This will consider the recreation benefits of a proposed reservoir in this location including opportunities for footpaths and cycle routes.	No changes to the plan considered necessary.
Canterbury & District Angling Association	G2.1	Preferred Plan - Reservoirs - Broad Oak	Note that revised plans are much smaller than have been previously proposed and are pleased to support latest scheme.	We welcome this support for the Broad Oak scheme.	No changes to the plan considered necessary.
Salmon and Trout Association	G4.4	Preferred Plan - Reservoirs - Broad Oak	Reservations about viability of Broad Oak scheme due to small volume and configuration of reservoir. Will be filled with eutrophic water. Concern will lead to extreme algal concentrations. Also, may be necessary to top up in summer when flows from the river Great Stour unlikely to be available.	<p>We are committed to undertaking further study of the environmental impacts of a proposed Broad Oak reservoir in the next AMP6 period to determine its feasibility alongside further environmental assessment. We have identified alternative options that would be brought in if the proposed Broad Oak was found not to be viable and these studies will be undertaken over the next AMP period in time to inform WRMP19. These are set out in rWRMP14 Section 9.81.</p> <p>We will undertake more studies to ensure that any reservoir design would ensure effective reservoir mixing in order to maintain water quality.</p> <p>In general the reduced footprint, which avoids direct loss of SSSI and with the potential for significant impact mitigation and biodiversity enhancement, has been welcomed by Natural England.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.



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River Stour (Kent) Internal Drainage Board	G5.5	Preferred Plan - Reservoirs - Broad Oak	Believes Broad Oak reservoir; with appropriate conditions to protect the local environment, could provide considerable benefit. Concern that an over reliance may be placed on this scheme, particularly in light of WFD. Crucial that regular flows maintained in the Sarre Penn watercourse. Further details appreciated in due course.	<p>Support for preferred option is noted. In AMP6 we will work with stakeholders to confirm the feasibility of a proposed reservoir at Broad Oak and increase our understanding of environmental constraints, including impact on the Sarre Penn and possible mitigation and enhancement. In time, we propose to set up stakeholder groups to ensure the scheme is delivered appropriately and that opportunities exist to agree positive benefits and overall approach. Details of the further work to be undertaken are set out in rWRMP 14 Section 9.81.</p> <p>We have also identified alternative options, which would be brought in if the proposed Broad Oak were found not to be viable.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Kent Wildlife Trust	G6.17	Preferred Plan - Reservoirs - Broad Oak	Not opposed to the building of new reservoirs in principle. Need to be convinced no alternative way of meeting future water demand and those environmental effects are minimised and mitigated and that clear environmental gains would result elsewhere. Main concerns are loss of valuable habitat from flooding of site and effect on river downstream.	<p>We have explained how our plan is the best value plan for ensuring future water supplies, taking into account economic costs, risk, resilience environmental and social costs and stakeholder preferences.</p> <p>dWRMP14 Section 7 details how we have assessed each individual option to either increase supply or reduce demand, including environmental and social costs. The reservoir options include environmental mitigation and potential enhancement.</p> <p>As part of the current plan, we are committed to undertaking further investigations in AMP6 on Broad Oak to determine its feasibility alongside further environmental assessment, which will include a consideration of any loss in habitat and the effects of the option on the river downstream. This work is set out in rWRMP14 Section 9.81. The potential for mitigation to address significant impacts and biodiversity enhancement was identified in the preparation of dWRMP14 and additional information on the potential enhancements is included in the updated Environmental Report.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81 and the updated Environmental Report.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Institution of Civil Engineers South East England Water Panel	G8.10	Preferred Plan - Reservoirs - Broad Oak	Question whether consideration should be given to a joint promotion with Southern Water at a bigger scale.	<p>Our previous plan proposed a bigger footprint for a reservoir at Broad Oak and received a large number of objections relating to loss of designated habitats and impacts on protected species. In their response to dWRMP14 Natural England indicated that they would be very concerned by any proposed increase in the size of the reservoir.</p> <p>As part of the current plan, we are committed to undertaking further investigations on Broad Oak to determine its feasibility alongside further environmental assessment. The potential for significant impact mitigation and biodiversity enhancement was identified in the preparation of the draft plan and additional information on the potential enhancements is included in the updated Environmental Report.</p> <p>A slightly larger option might be identified through further work, but this would still be constrained by the need to avoid the SSSI and minimise significant environmental impacts.</p> <p>As part of the WRSE project and the East Kent Strategy, which will be undertaken in AMP6, we will consider whether Broad Oak can be jointly promoted with Southern Water and Affinity Water.</p>	Clarification provided in the Statement of Response. Details of the additional work that will be undertaken is included in rWRMP14 Section 9.81 and the updated Environmental Report.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Natural England	RI.13	Preferred Plan - Reservoirs - Broad Oak	<p>Broad Oak Reservoir: Adjacent to and partially surrounded by West Blean and Thorndean Woods SSSI. WRMP09 option larger and would have significantly damaged SSSI. WRMP14 option would not result in any direct loss of the SSSI habitat but still potential for indirect impacts from construction, possible shading of the SSSI and feeding habitat for SSSI birds and invertebrate species. To ameliorate impacts significant amount of woodland and semi-natural habitat creation is required. Significant opportunities to mitigate provided by smaller reservoir. Also opportunities for biodiversity enhancement by improving connectivity of SSSI woodland parcels and surrounding woodland. Mitigation is proposed within dWRMP14 but additional information on enhancements should be included.</p> <p>Despite concerns by other stakeholders, Natural England would be concerned about any increase in reservoir size. Recommend that option be investigated before WRMP19 to remove design concerns. If only viable at larger size, then would expect alternatives to be pursued. Given the long lead in time and design uncertainty for alternatives, recommend that these be investigated further alongside Broad Oak reservoir.</p>	<p>Natural England's comments support the change to the design of the dWRMP14 Broad Oak option, which avoids direct loss of SSSI and has the potential for significant impact mitigation and biodiversity enhancement. Additional information on the potential enhancements is included in the updated Environmental Report. We are committed to undertaking further investigations on Broad Oak to determine its feasibility alongside further environmental assessment. This work is set out in rWRMP Section 9.81.</p> <p>We have identified alternative options that would be brought in if the proposed Broad Oak reservoir was found not to be viable. Further work on alternatives, including triggers and planned investigations is presented in rWRMP14 Appendix 9.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81 and the updated Environmental Report.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Individual	C4.1	Preferred Plan - Reservoirs - Broad Oak	Objects to proposal due to associated environmental impacts and detrimental effects on the natural beauty of the area. Suggests that more consideration should be given to water re-usage and other alternatives such as desalination.	<p>We have developed a balanced preferred plan combining both demand management and supply options, using a consistent approach to the selection of options as set out in our plan. We have looked at all options as identified in the East Kent Strategy and ensured they are properly represented in the feasible option list as discussed in rWRMP14 Sections 7 and 8.</p> <p>We propose a significant amount of work in AMP6 to understand the environmental impacts of Broad Oak. This will include a range of studies and will consider alternatives to Broad Oak and review the benefits and costs. This is set out in rWRMP14 Section 9.81.</p> <p>Rigorous environmental assessments will be undertaken on each of our strategic options, including desalination and water reuse. We will work with stakeholders, including local residents to ensure that all the impacts are understood.</p> <p>It is accepted that there may unforeseen impacts with the schemes in our plan, and we have identified alternative options. All the options we have identified have an environmental impact and one of the reasons water re-use and desalination is expensive is because of the high energy use and associated carbon costs.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Individual	C15.2	Preferred Plan - Reservoirs - Broad Oak	Question why have to wait until 2020 for a reservoir to be built. Pressing need for water in East Kent now and further housing growth planned. Previous application for reservoir rejected on short term NIMBY objections. Long term water need must be the overriding consideration in the face of climate change.	<p>Our water resources development programme assesses the best value way of meeting the supply demand deficit using both demand and supply options as and when they are required. Our preferred plan deals with risk and uncertainty in assessing the balance of demand and supply against affordability and best value. Until 2020 our modelling suggests there are other options that are more appropriate. Furthermore construction of new reservoirs has a long lead time because of the planning, consultation, design and construction involved.</p> <p>Assumptions as to the potential impacts on the water supplies available due to the uncertainty of climate change have been built into our demand forecasting, the consideration of options and the process of developing our preferred plan. In developing our preferred plan we undertook extensive modelling and sensitivity testing to ensure sufficient water supplies were available throughout the plan period based on best available demand forecasts.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Ashford Borough Council	A6.4	Preferred Plan - Reservoirs - Broad Oak	East Kent Investigation should include Broad Oak reservoir.	We can confirm that the Broad Oak will form part of this East Kent Strategy looking at options to support water supplies in Kent.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
CPRE Kent	G9.4	Preferred Plan - Reservoirs - Broad Oak	Raised concerns as part of the EFG in February 2013. The EA CAMS 2003 Assessment rates Stour basin as over-licensed and requiring measures to restore sustainable abstraction. Includes recommendation to investigate viability of re-locating the Company's Stour Valley abstraction further downstream. Also evidence of increasing stress on tidal river below Canterbury. Will be further exacerbated by any abstractions associated with Broad Oak option. Call for more integrated approach to be resilient to climate change, support irrigation demands in Stour marshes and protect ecosystem of wetlands. May be potential for indirect effluent re-use (based at Weatherlees, Bybrook or Herne Bay) to deliver reliable drought output to RZ8 and sustainable improvements in the environment. Suggests Lower Stour management scheme.	<p>We propose a significant amount of work in AMP6 to understand the environmental impacts of Broad Oak. This will include a range of studies and will consider alternatives to Broad Oak and review the benefits and costs. This is set out in rWRMP14 Section 9.81.</p> <p>As part of the East Kent strategy we will work with Southern Water and Affinity Water to consider options to support Kent, and these will include water re-use. If appropriate we would support the development of a Lower Stour Management scheme, in association with other stakeholders. We suggest this is part of the AMP6 feasibility investigation.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Individual	C5.1	Preferred Plan - Reservoirs - Broad Oak	Agrees with proposed reservoir. Suggestion that it would also be good for public to have use of the proposed reservoir for leisure purposes, such as development of a pedestrian or cycle route. Canterbury City Council together with Kent County Council has a cycle route in Transport Strategy.	We welcome the support for the Broad Oak option. The next steps will be for further investigations to be undertaken during the AMP6 period to inform detailed studies for the reservoir. This will consider the recreation benefits of a proposed reservoir in this location including opportunities for footpaths and cycle routes. Regard will be taken of local authority initiatives in place at the time or proposed as part of this work.	No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Environment Agency	R2.30b	Preferred Plan - Reservoirs - Broad Oak	Improvement 18b – Broad Oak Broad Oak reservoir needs to include proper monitoring - the cost of this should be considered and checked to see if scheme is still economic to pursue. Further consideration should be given to this option being used as a conjunctive use option and/or in partnership with Southern Water Services and Affinity Water.	We welcome the Environment Agency's support for the Broad Oak option in our dWRMP14 and we look forward to their continued involvement during the on-going feasibility studies for this option during AMP6. We will address the question as to whether this option could be used as a conjunctive use option as part of the proposed East Kent Strategy, which we intend to carry out in partnership with Southern Water Services and Affinity Water.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Individual	C26.1	Preferred Plan - Reservoirs - Broad Oak	Check dam wall proximity to existing tenant properties. Local tenants would appreciate a heads up before anything goes public.	<p>The individual made this comment at our Broad Oak drop in event, 5th June 2013, but elected not to make a formal representation on the matter to Defra. However, we have included their comment, and our response to it, for completeness.</p> <p>We are committed to undertaking further investigations in AMP6 (period 2015 to 2020) on the feasibility and design of the Broad Oak scheme. As part of those investigations we propose to engage fully with the local community and stakeholders. As part of our engagement, we will ensure our tenants at Broad Oak are kept fully apprised of the outcomes of the investigations at every key stage.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Hart District Council	A11.2	Preferred Plan - Reservoirs General Comments	Disappointed about lack of new reservoirs proposed in central southern England, seen as a flaw in the plan. Expects more work to be done in this regard i.e. strategic reservoir site assessment across south east with other water companies.	Our water resources development programme assesses the best value way of meeting the supply demand deficit using both demand and supply options as and when they are required. Our preferred plan deals with risk and uncertainty in assessing the balance of demand and supply against affordability and best value. Until 2020 our modelling suggests there are other options which are more appropriate. Furthermore construction of new reservoirs has a long lead time because of the planning, consultation, design and construction involved.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Ouse and Adur Rivers Trust	G3.5	Preferred Plan - Reservoirs General Comments	Due to uncertainty of climate change bring forward plans for reservoir storage and other infrastructure. Where WRMP considers alternative sites for reservoirs, both options should be actioned.		
Individual	C8.1	Preferred Plan - Reservoirs General Comments	Reservoir building should be brought forward due to the water shortages experienced and flooding in the south on a yearly basis.	Assumptions as to the potential impacts on the water supplies available due to the uncertainty of climate change have been built into our demand forecasting, the consideration of options and the process of developing our preferred plan. In developing our preferred plan we undertook extensive modelling and sensitivity testing to ensure sufficient water supplies were available throughout the plan period based on best available demand forecasts.  We will continue to work with neighbouring water companies and encourage a regional approach to water resources planning via our active participation in the WRSE project.	
Natural England	R1.17	Preferred Plan - Reservoirs General Comments	Landscape impacts - reservoir options: Both options would significantly alter landscape in which they are built. Opportunities for landscape improvements.	This statement supports the assessment reported in the Environmental Report that although both reservoirs will bring about significant change to the landscape, they both provide opportunities for landscape enhancement.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Individual	C14.3	Preferred Plan - Water Efficiency	There should be more advertising on the value of water.	<p>Our metering strategy provides an incentive for customers to reduce their demand and also ensures that customers pay according to the volume they use. We believe that this is important as part of our strategy to reduce consumption and to provide a link with customers between water use and the cost of water. A large proportion of water is heated and initiatives to reduce energy consumption will also provide a link between water use and the wider environment.</p> <p>We believe customers and stakeholders are more aware of the value water plays in society, for instance there is an on-going series of studies looking at the impacts of low flows in rivers. Furthermore we have included environmental and social costs and benefits of different types of schemes in our economic assessment. Our customer focus groups have shown that customers prefer to re-use water than develop new sources where they may damage the environment.</p> <p>We have an on-going water efficiency programme that is designed to encourage customers to reduce their consumption by providing them with information on their usage and ways they can reduce it. We will continue to innovate new approaches to this, including proposed improvements to customers' bills and will continue to engage with customers to identify the best ways to improve the link between water use and the wider environmental benefits of water.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary. No changes to the plan considered necessary.
Individual	C22.8	Preferred Plan - Water Efficiency	Planned savings are too low and this should be a priority. Smart meters should be introduced which would encourage water conservation. Would like to see provision of water efficient devices. Building regulations inadequate.	We believe that metering is essential to help us reduce consumption and customers generally support metering. Our metering programme includes the provision of meters with a smart module, which allows us to collect information to identify high usage and leakage. We will continue to support efforts by planning authorities and government to improve water efficiency in new households. We explain how we will approach this in our water efficiency strategy in dWRMP14 Appendix 4.	Clarification has been included in our Water Efficiency Strategy in dWRMP14Appendix 4D.



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
East Hampshire District Council	A2.1	Preferred Plan - Water Efficiency	Supports the plan's water efficiency stance on promoting demand management initiatives. Aligns with policies in submitted Joint Core Strategy.	We welcome the support received for our preferred plan.	No changes to the plan considered necessary.
Lewes District Council	A7.2	Preferred Plan - Water Efficiency	Welcomes the emphasis on an ambitious demand management programme in the plan and the requirement to build further new resource capacity. The twin track strategy as an intelligent approach to meeting future challenges in provision of water resources is supported.		
Albion Water	W1.1	Preferred Plan - Water Efficiency	Right approach to prioritise internal performance.		
South Downs National Park Authority	A4.15	Preferred Plan - Water Efficiency	Support the inclusion of water efficiency measures to deliver reductions in per capita consumption. Not clear from Appendix 4 what these additional measures are. Request these are clarified in the final WRMP with a strong focus on more enhanced innovative solutions.	<p>rWRMP14 Appendix 4D provides details of our baseline water efficiency strategy and Section 9 provides details of the water efficiency options beyond our baseline programme.</p> <p>Our optioneering process considered a broader range of water efficiency options, however customers did not support some of these and others were too expensive and did not form part of our preferred plan.</p> <p>As best practice, we will reassess the costs and benefits of water efficiency measures before our next WRMP in 2019 to see if the economic case for more innovative solutions is stronger and warrants inclusion in the preferred plan at that time.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Ashford Borough Council	A6.3	Preferred Plan - Water Efficiency	Make specific reference to their water efficiency aspirations to be applied to all developments, not just major development - relevant Core Strategy policies cited. Requests WRMP makes specific reference to policy aspirations of Ashford Water Action Plan (2011-2016) and the need for LPAs, developers and SEW to work closely to deliver water efficiency.	We have a good working relationship with Ashford Borough Council and meet quarterly. We have updated rWRMP14 Appendix 4 to clarify our position.	rWRMP14 Appendix 4 has been updated to include additional reference to Ashford Borough Council.
Kent County Council	A14.6	Preferred Plan - Water Efficiency	Supports the plan's water efficiency initiatives and planned reductions in per capita consumption. Opportunity for SEW and KCC to work closely in Kent Green Deal Partnership. Suggests more could be done if water companies collaborate together.  Appendix 8 shows some support for 'stepped tariffs' but no mention of these in the preferred plan.	Whenever invited we are pleased to work with local authorities as they aim to make new developments more efficient. We would be pleased if the Council contacted us directly regarding its work so we can develop a partnership.  Initially we included options for tariffs in our optioneering work, however customers did not support these options and we did not include them in our preferred plan.  As we collect more information on our metering programme we will be able to understand the impacts of metering on consumption and target water efficiency programmes accordingly. If in the future our research suggests that customers would support sophisticated tariffs we will undertake further research and consider their implementation.	Clarification provided in the Statement of Response. No changes to the plan considered necessary, although text in rWRMP14 Appendix 4 has been reviewed and added so that it is more explicit.

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Burgess Hill Town Council	P7.2	Preferred Plan - Water Efficiency	Plans for recycling of grey water in new build properties should be part of WRMP for area.	<p>We are committed to working with local planning authorities and offer guidance as necessary to ensure planning polices make the best use of grey water:</p> <p>The per capita consumption for new build properties assumed in our demand forecast is based on a high level of achievement of the Code for Sustainable Homes. The code includes recycling of grey water as one of the key elements.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Kent Wildlife Trust	G6.4	Preferred Plan - Water Efficiency	Welcome intention to reduce leakage and increase water efficiency measures. Would like to see more ambitious target for water efficiency. Do not agree that failure to manage demand should be built in as a degree of uncertainty and therefore evidence for the need for a new resource. SEV should work closely with developers and town planners to reduce use of water resources and innovative ways to manage demand should be sought and implemented if existing measures are unsuccessful. Support community water resource reduction.	<p>We have an on-going water efficiency programme that is designed to encourage customers to reduce their consumption by providing them with information on their usage and ways they can reduce it. We will continue to innovate with new approaches to this, including proposed improvements to customers' bills and will continue to engage with customers to identify the best ways to improve the link between water use and the wider environmental benefits of water. We also remain committed to our customer metering programme and our target of achieving 90% coverage by 2020 and beyond this date will consider additional metering programmes to drive increased water efficiency.</p> <p>We work closely with local authorities in advising of demand management measures and ensuring appropriate planning policies are in place through representations to the local plan process.</p> <p>Our engagement strategy in preparing the draft plan included a number of local authority workshops and individual meetings with local authorities where appropriate. It is our intention to continue to foster closer working with local authorities in taking the final plan forward.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent Downs AONB Unit	G7.2	Preferred Plan - Water Efficiency	Support to reduce demand through compulsory metering and education.	We welcome the support received for the preferred plan.	No changes to the plan considered necessary.
Kent Downs AONB Unit	G7.3	Preferred Plan - Water Efficiency	Should use non potable / recycled water for non domestic use.	We have assumed that business/commercial users will manage their own water use and will introduce water efficiency measures such as grey water and recycling where these are cost effective. We offer an audit programme to customers to assist them in identifying such opportunities to reduce their water demands. The non-household demand forecast on which our plan is based assumes that customers will implement water efficiency measures to offset growth in demand.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Individual	C8.2	Preferred Plan - Water Re-Use General Comments	Concerned about re-using wastewater. Concerned about drug residue within the water system, in particular hormone levels.	In AMP6 we will undertake detailed investigations into the feasibility, water quality and costs of water re-use. Information is set out in rWRMP14 Section 9.81. Part of this work will include consultation with the Drinking Water Inspectorate (DWI) and Southern Water regarding water quality (including residues). Furthermore, we will need to understand the impacts of discharging the water on river systems, including fish migration. In AMP6 we will undertake detailed investigations into the feasibility, quality, social acceptance, and costs of water re-use.	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Individual	C22.12	Preferred Plan - Water Re-Use General Comments	Strongly support. Would prefer to see alternative option of aquifer storage and reuse - Peacehaven chalk recharged with treated effluent.	<p>We welcome the support received for the option.</p> <p>Our review during AMP6 will consider all aspects of the preferred water re-use schemes including potential environmental impacts, water quality and public health concerns. Details are provided in rWRMP14 Section 9.81.</p> <p>The Peacehaven Chalk is in Southern Water's supply area so would not benefit our customers as a scheme. However we have a number of concerns as to why this is not feasible. In particular the high transmissivity of the Chalk would mean a scheme would have large losses. There would also be water quality concerns regarding discharge of the water.</p> <p>In the AMP7 period we will consider the benefits of further water re-use schemes dependent on the results of the Aylesford Project in Kent.</p> <p>As part of this process we will be setting up stakeholder groups, inviting participation from interested parties. These groups are likely to be similar to the format of the Environment Focus Group, whose role in the development of the dWRMP has been well supported.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Swale Borough Council	A12.3	Preferred Plan - Water Re-Use General Comments	Ensure the carbon costs of this option are fully explored and renewable energy related to water re-use should be fully considered.	<p>Carbon costs were calculated for all our options based on realistic estimates of power consumption.</p> <p>rWRMP14 section 9.81 sets out further details of the studies we propose to undertake in AMP6 and AMP7 to ensure careful delivery of strategic water re-use options. This will include consideration of a broad range of environmental and social issues and we look forward to working with Swale Borough Council on these further studies.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Downswood Parish Council	P8.2	Preferred Plan - Water Re-Use General Comments	Number of wastewater treatment works already discharge to river; so would make sense for Aylesford and Peacehaven to discharge to a point where water could be re-used.	In AMP6 we will work with Southern Water; DWI and other stakeholders to confirm the details of the technology and approach for the water re-use schemes at Aylesford and Peacehaven. Details are set out in rWRMP14 Section 9.81.	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Inland Waterways Association, Kent & Sussex Branch	G1.3	Preferred Plan - Water Re-Use General Comments	Sections 9.30 - 9.33 of dWRMP14 relate to water re-use options at Aylesford and Peacehaven. DWI prohibits direct use of treated effluent for water supply and therefore both schemes are intended to discharge to rivers. Ask that this be taken up with DWI.	We propose to set up stakeholder groups, (we would invite DWI to participate) to ensure the schemes are delivered appropriately and that opportunities exist to agree on the technology and overall approach. This will also consider how potential environmental impacts can be minimised and environmental benefits maximised.	
Inland Waterways Association, Kent & Sussex Branch	G1.4	Preferred Plan - Water Re-Use General Comments	Discharged water will have been treated by Reverse Osmosis therefore very pure but at different temperature to river water. Concern that options could adversely impact and damage river. Suggest that RO water is held in buffer tanks where it is mixed with other treated water before going directly to supply.		
Ouse and Adur Rivers Trust	G3.6	Preferred Plan - Water Re-Use General Comments	Concerns about environmental impact from water re-use on rivers. Preference for direct reuse over indirect methods.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent Wildlife Trust	G6.16	Preferred Plan - Water Re-Use General Comments	Support in principle but development of any new infrastructure must be accompanied by stringent assessment of environmental and energy impacts.	<p>We have undertaken considerable engagement with local communities, local planning authorities and local organisations during the preparation of the plan including customer surveys, workshops and focus groups. This has ensured transparency has been achieved in as fully inclusive manner as possible and has enabled areas of concern to be raised and considered early in the plan process.</p> <p>In AMP6 we will work with Southern Water, DWI and other stakeholders to confirm the details of the technology and approach for the water re-use schemes at Aylesford and Peacehaven. Details are set out in dWRMP14 Section 9.8I.</p> <p>We are committed to continued work with key stakeholders and interested local organisations as part of taking forward the detailed proposals for individual scheme within the preferred plan. This will ensure potential issues, including an assessment of environmental and other impacts of water re-use options, are identified and fully investigated.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.8I.
Kent Downs AONB Unit	G7.8	Preferred Plan - Water Re-Use General Comments	Disappointed that only two re-use schemes. Re-use schemes across all sectors could reduce need for new infrastructure and overall demand for potable water:	We considered an extensive range of reuse schemes as part of the optioneering process. A total of 28 schemes were the subject of Multiple Criteria Analysis (see section C3 of dWRMP Appendix 7C). Table 27 of Appendix 7 summarises the results with 21 options being screened out, 2 placed on a reserve list and 5 options carried forward to the feasible options list. Details specific to each option are summarised in Appendix 7E. The 5 feasible options included schemes in RZ3 and RZ8 and a variant in RZ2 in addition to the two selected (in RZ2 and RZ6). The additional feasible schemes were not selected in the modelling process. However, we have included one reuse option (Weatherlees) as a potential alternative to other options in RZ8 (see Table 9.10).	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent County Council	A14.10	Preferred Plan - Water Re-Use Aylesford	KCC supports option provided appropriate precautions are in place to ensure no adverse impact on water quality and public health. Want details of how the Aylesford water re-use scheme would be shared between both water companies.	<p>We welcome the support received for the option.</p> <p>As part of the strategic review of options during AMP6 we will consider this option in greater detail working with Southern Water. This is in line with rWRMP14 Section 9.81.</p> <p>This review will consider all aspects of the Aylesford water re-use scheme including potential adverse environmental impacts, water quality and concerns raised about public health.</p> <p>In the AMP7 period we will consider the benefits of further water re-use schemes dependent on the results of the Aylesford Project.</p>	Clarification provided in the Statement of Response. List of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
River Stour (Kent) Internal Drainage Board	G5.3	Preferred Plan - Water Re-Use Aylesford	Believe option provides considerable benefit and pleased to see its inclusion. Believe option should be extended to more locations (where possible).	<p>We welcome the support received for the option.</p> <p>As part of the strategic review of options in East Kent we will consider water re-use at Weatherlees, working with Southern Water and Affinity Water. This review will consider all aspects of water re-use schemes including environmental impacts, water quality and any public health concerns.</p> <p>As part of this process we will be setting up stakeholder groups, inviting participation from interested parties. These groups are likely to be similar to the format of the Environment Focus Group, whose role in the development of the dWRMP14 has been well received.</p> <p>We considered an extensive range of reuse schemes as part of the optioneering process. A total of 28 schemes were the subject of Multiple Criteria Analysis (see section C3 of dWRMP Appendix 7C). Table 27 of Appendix 7 summarises the results with 21 options being screened out, 2 placed on a reserve list and 5 options carried forward to the feasible options list. Details specific to each option are summarised in Appendix 7E. The 5 feasible options included schemes in RZ3 and RZ8 and a variant in RZ2 in addition to the two selected (in RZ2 and RZ6). The additional feasible schemes were not selected in the modelling process. However, we have included one reuse option (Weatherlees) as a potential alternative to other options in RZ8 (see Table 9.10).</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.



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CPRE Kent	G9.3	Preferred Plan - Water Re-Use Aylesford	Recommend Aylesford reuse is brought forward into WRMP14.	<p>We have reviewed the time required to undertake feasibility studies, water quality assessments and construct the scheme and we do not believe it is feasible to construct the scheme in AMP6. In particular we expect that environmental studies, including water quality impact assessments, will require several years monitoring.</p> <p>If our studies in AMP6 show that Aylesford can be brought forward, it may be possible to construct it earlier in AMP7 than is in our current plan, and we will consider this in our next WRMP.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Environment Agency	R2.10	Preferred Plan - Water Re-Use Aylesford	Recommendation 6b - SEW and Southern Water dWRMP14s reveal some confusion around future allocation from existing jointly owned River Medway Scheme and whether the proposed effluent re-use scheme in Kent will be promoted jointly or individually and, in either case, what the assumed deployable output, allocation and timing will be. Needs to be clarified and represented consistently in both final plans, with explanation.	We have now clarified and agreed details with Southern Water for both the allocation from the River Medway Scheme and the joint promotion of the proposed re-use scheme at Aylesford in Kent.	Further detail on the River Medway Scheme is included in rWRMP14 Section 3 and Section 9.
Environment Agency	R2.30d	Preferred Plan - Water Re-Use Aylesford	Improvement 18d - Aylesford Reuse The Aylesford effluent re-use option is not consistent with other company plans. The company should address this inconsistency.	We have agreed revised text with Southern Water on the Aylesford scheme and this is included in rWRMP14 Section 9.	Details of the proposed re-use scheme at Aylesford are included in rWRMP14 Section 9.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
South Downs National Park Authority	A4.19	Preferred Plan - Water Re-Use Peacehaven	Acknowledge Peacehaven option and request to be involved in further work to ensure appropriate environmental assessment is undertaken. Wish to see environmental safeguards in place to prevent further deterioration of River Ouse in terms of hydro morphology, ecology and water quality.	<p>Whilst we included environmental and social considerations as part of our initial option appraisal process, we are committed to working with key stakeholders and interested local organisations to take forward the detailed proposals for individual schemes within the preferred plan. This will ensure potential issues, including environmental impacts, are identified and fully investigated.</p> <p>Section 9.81 list further studies we propose to undertake in AMP6 (period 2015 to 2020) to ensure careful delivery of strategic schemes across our supply area. This will include consideration of a broad range of environmental and social issues.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Lewes District Council	A7.3	Preferred Plan - Water Re-Use Peacehaven	Requests careful consideration is given to minimising the potential adverse impacts on biodiversity, landscape and cultural heritage arising from proposed Ouse pipeline as part of the Peacehaven scheme. Council will expect good construction practices to be employed.	We are committed to further assessment of the Peacehaven scheme during AMP6. This will include a detailed assessment of the Newhaven site and routing studies for the Ouse pipeline to minimise impacts on biodiversity, landscape and cultural heritage. We will be continuing stakeholder engagement for the Peacehaven scheme with the relevant statutory bodies, the local planning authorities – East Sussex County Council, Lewes District Council and the South Downs National Park Authority and local interest groups.	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
East Sussex County Council	A10.4	Preferred Plan - Water Re-Use Peacehaven	The inclusion of Peacehaven welcomed but more work and scrutiny required particularly in relation to associated transfer pipeline.	We are committed to good construction practice and will develop and discuss the specific requirements as part of the detailed studies going forward and through the EIA process.	SEA/HRA updated to highlight concern over Ouse pipeline and text added to Environmental Report Environmental Action Plan to clarify commitment to additional assessment and stakeholder consultation in next AMP period.
Individual	C12.2	Preferred Plan - Water Re-Use Peacehaven	Not convinced that water re-use will be supported by politicians. Question whether sufficient land is available at Newhaven to undertake the necessary landscaping to make it visually acceptable. Concerns about the disruption caused by the introduction of new pipelines. Suggests alternative routes (Peacehaven WwTW to Lewes WwTW) or reduction in length to minimise disruption. Asks whether route to the discharge point in North Sussex been planned.	Our rWRMP14 Section 9.81 sets out further details of the studies we propose to undertake in AMP6 and AMP7 to ensure careful delivery of strategic schemes including Peacehaven.	

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Lewes District Council	A7.4	Preferred Plan - Water Re-Use Peacehaven	Concerns over potential long term impacts on water quality and aquatic biodiversity in the River Ouse and potential impact on brine discharge on the marine environment and fisheries in Seaford Bay. Further investigation of potential impacts required and necessary operational restrictions implemented. Needs assurance of public health risks can be satisfactorily addressed.	<p>We are committed to further assessment of the Peacehaven scheme during AMP 6. This will include assessment of impacts on water quality and aquatic biodiversity in the River Ouse and the marine environment and fisheries in Seaford Bay.</p> <p>The potential impacts on the riverine and marine environment from water reuse schemes have been considered in the Environmental Report and the HRA screening report. There is potential to minimise potential impacts on the riverine, marine and coastal environment through detailed siting and design. The options all assume a long sea outfall and the inclusion of brine dispersal technology.</p> <p>We will be continuing stakeholder engagement for the Peacehaven scheme with the relevant statutory bodies, the local planning authorities – East Sussex County Council, Lewes District Council and the South Downs National Park Authority and local interest groups.</p> <p>rWRMP14 Section 9.81 sets out further details of the studies we propose to undertake in AMP6 and AMP7 to ensure careful delivery of strategic schemes including Peacehaven.</p>	<p>Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.</p> <p>SEA/HRA updated and text added to Environmental Report Environmental Action Plan to clarify commitment to additional assessment and stakeholder consultation in next AMP period.</p>
Environment Agency	R2.12	Preferred Plan - Water Re-Use Peacehaven	Recommendation 6c - Demonstrate further understanding of how SEW will access effluent from Southern Water's East Sussex Wastewater treatment plant for reuse.	<p>We have agreed joint wording with Southern Water and this is included in rWRMP14 Section 9.</p> <p>rWRMP14 Section 9.81 sets out further details of the studies we propose to undertake in AMP6 and AMP7 to ensure careful delivery of strategic schemes including Peacehaven.</p>	<p>Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.</p>

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Lewes District Council	A7.5	Preferred Plan - Water Re-Use Peacehaven	Highlights intensive energy requirements of option and SEW to seek early engagement with electricity supplier to ensure Newhaven distribution network has sufficient capacity.	rWRMP14 Section 9.81 sets out further details of the studies we propose to undertake in AMP6 and AMP7 to ensure careful delivery of strategic schemes including Peacehaven. This will include power requirements and involve discussions with National Grid and our energy suppliers.	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Wokingham Borough Council	A1.5	Preferred Plan - Water Transfers	Concerned with planning impacts of Thames transfer into SEW.	The only Thames transfer into SEW included in our preferred plan is for a connection from Windsor to the existing trunk main between our water treatment works in RZ4 and the service reservoir complex at Surrey Hills. The proposed route of this transfer does not impact on Wokingham Borough. However, further studies will be undertaken at the detailed design stage.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Wokingham Borough Council	A1.6	Preferred Plan - Water Transfers	Concern over potential negative cumulative impacts of water transfer options in the east of Wokingham Borough, including impacts on Ancient Woodland, wetland habitats, registered Parks and Gardens and buried archaeological interest. Request greater level of detail in the plan and possible alternatives to ensure no detrimental impact takes place.	The initial list of feasible options (dWRMP14 Figure 7.2) included two transfers in Wokingham Borough, both from Thames Water. However, as noted in paragraph 35 of dWRMP14 Appendix 8, Thames Water subsequently indicated that these transfers would not be available because of constraints on the Lower Thames Operating Agreement, which regulates abstractions from the River Thames and the implications of the Water Framework Directive. The preferred plan does not therefore include any water transfers in Wokingham Borough (see dWRMP14 Figure 9.1).	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

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South Downs National Park Authority	A4.17	Preferred Plan - WaterTransfers	Clanfield to Tilmore option - desire further engagement at early stage as option developed to ensure potential impacts are fully assessed and addressed. Request habitats and landscape features are reinstated following construction, acknowledges that historically SEW has been very good at this.	<p>The routing for the new pipelines is only preliminary at this strategic stage but this routing has aimed to minimise impacts on designated sites and important habitats. The Environmental Report identifies potential impacts for pipelines including those that can be mitigated and those that could cause irreversible effects, such as where pipelines pass through areas of important habitats. The Environmental Report recommends that further detailed assessment and routing is undertaken for all pipelines in discussion with relevant stakeholders.</p> <p>We will work with the South Downs National Park Authority and Natural England during the development of the scheme to fully understand the constraints and opportunities in the delivery of the scheme, including an assessment of potential environmental effects.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Surrey County Council	A8.5	Preferred Plan - WaterTransfers	Raises concerns about reliability and high costs, which could impact on consumers.	<p>The reliability of transfers was initially identified through the WRSE modelling, and since then we have had further discussions with donor water companies to ensure the transfers are reliable under design conditions. In particular we have undertaken initial work with Sutton and East Surrey Water and Southern Water on the transfers with those two companies.</p> <p>From an economic perspective the options have been shown to be part of an overall economic solution in both the WRSE modelling and our own analysis. We are confident that the options represent good value for customers.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Surrey County Council	A8.6	Preferred Plan - WaterTransfers	What are the alternatives to transfers, are these being taken account of robustly? Are there contingency measures in place should the proposed imports become unviable.	<p>Details of all the options are set out in rWRMP14 Section 7 and Appendix 7. Alternatives to the transfers set out in the plan include aquifer storage recovery (ASR), leakage reduction and water efficiency.</p> <p>The transfers are required later in the plan, and we will work with donor companies in AMP7 and 8 to confirm the details of the options.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

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Hart District Council	A11.3	Preferred Plan - Water Transfers	Pipeline between North Bracknell and central Hart is supported. Very pleased with level of involvement offered by Company to engage with the preparation of the plan.	We welcome the support received for this pipeline. This pipeline reinforces the network within our WRZ4 and is included as part of the Business Plan rather than a specific option within the dWRMP14.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Dartford Borough Council	A13.2	Preferred Plan - Water Transfers	Seeks assurance that the proposed transfer options in WRMP are resilient and are not reduced as a consequence of the consultation on Southern Water's WRMP.	Our extensive optioneering process and proactive engagement with other water companies in the South East of England as part of the WRSE Group has enabled us to fully explore the possibility of sharing existing and new strategic water resources in the most efficient and effective way whilst maintaining security of supply, protecting the environment and minimising costs to our customers.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Individual	C15.3	Preferred Plan - Water Transfers	Concern that plans to share water as all located in dry areas of the South/South East.	As well as identifying opportunities, the Group's work has highlighted the fact that most other water companies face similar challenges. The work to consider the merits of extending the existing regional water grids and developing further connections between water companies therefore recognises that the region as a whole is already water stressed and experiencing pressure.	
Downswood Parish Council	P8.4	Preferred Plan - Water Transfers	Concern about reliability in severe drought situation. Will transfers be available in times of drought?	In preparing our dWRMP14 we have taken the decision to use the same regional model as developed by the WRSE Group. This has enabled us to test our own scenarios (which are based on more detailed knowledge of local conditions and levels of service tuned to the unique and specific needs of our domestic and business customers), against the regional picture.	
River Stour (Kent) Internal Drainage Board	G5.4	Preferred Plan - Water Transfers	Sharing water and providing greater flexibility is welcome but hopes benefits of transfers not over-estimated.	We have sought to ensure that our preferred Plan supports the outcome of the WRSE Group's modelling work where this can be demonstrated not to leave our customers in a worse position in terms of cost to deliver the plan or levels of risk.	

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Since the initial WRSE modelling we have had further discussions with donor water companies to ensure the transfers are reliable under design conditions. In particular we have undertaken initial work with Sutton and East Surrey Water and Southern Water on the transfers with those two companies. The transfers are presented in all companies' rWRMP14s.

We are working with neighbouring water companies to ensure that agreements on bulk supplies are resilient, and these are affirmed in rWRMP14 Section 9 which confirms the arrangements with Southern Water; Sutton and East Surrey Water; Thames Water and Portsmouth Water.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent County Council	A14.9	Preferred Plan - Water Transfers	KCC is broadly supportive of transfers proposed. However concerned that impacts of supply options to support bulk supplies do not feature in WRMPs prepared by other water companies or that these bulk transfers are based on conditional arrangements. Financial cost based on 'large user tariff' questioned as to whether SEW are externalizing significant part of carbon emissions, failure to meet SEA objectives, yield uncertainty and delivery risk? Urges all relevant Water Companies to resolve issues in final WRMP, also applies to SEW exports.	<p>The reliability of transfers was initially identified through the WRSE modelling, and since then we have had further discussions with donor water companies to ensure the transfers are reliable under design conditions. In particular we have undertaken initial work with Sutton and East Surrey Water and Southern Water on the transfers with those two companies. The transfers are presented in all companies' rWRMP14s.</p> <p>From an economic perspective the options have been shown to be part of an overall economic solution in both the WRSE modelling and our own analysis. We have used actual cost data supplied by donating companies, and in all cases there are carbon costs borne by the donating company as well as ourselves. We are confident that the options represent good value for customers.</p>	<p>We have included further details of cost, including carbon costs, in rWRMP14 Section 9.</p> <p>SEA/HRA updated to highlight concern over Bough Beech and to clarify commitment to additional assessment and stakeholder consultation in next AMP period.</p>
Kent County Council	A14.13	Preferred Plan - Water Transfers	Appears that bulk supply to SEW is indirectly driving the need for raising level of Bough Beech reservoir in Sutton and East Surrey Water (SESW) dWRMP14. Better understanding of need for reservoirs and link to 1 in 40 year level of service.	<p>By working together with other companies, such as Sutton and East Surrey Water and Southern Water, our revised SEA for the rWRMP14 has considered cumulative benefits and we have worked with other companies to try to ensure that SEA objectives are met.</p> <p>In SESW's dWRMP the option of raising Bough Beech Reservoir was included in its preferred plan. The construction was after the implementation of transfers to us. We have spoken to SESW and understand that the raising of Bough Beech is no longer part of its investment plans. SESW have confirmed that they will still be able to supply the agreed transfers without this additional capacity.</p>	



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Natural England	R1.15	Preferred Plan - WaterTransfers	Inter-company Transfer TR22 & 22a - small section appears to go through Wouldham to Detling Escarpment SSSI and close to other SSSIs. Pipeline must avoid rooting zone of the woodlands and extreme care will be required not to cause construction impacts to encroach on vulnerable grasslands and rare plants. Table 8-2 suggests mitigation is optional and not integral part of scheme design. SEA to be updated to clarify if mitigation/avoidance measures are firmly costed part of the option design. If not routed around designated site, would have significant concerns.	The Environmental Report includes individual assessment sheets and clarifies that mitigation is a requirement and provision has been included for this in the scheme costings.	Clarification is provided in the SEA on provision for mitigation and enhancement measures and costings.
Consumer Council for Water	R3.10	Preferred Plan - WaterTransfers	Understand company is continuing discussions with Sutton and East Surrey Water and the Drinking Water Inspectorate about possible bulk supplies. Would want any potential water quality issues to be addressed before option progressed.	<p>We have worked with Sutton and East Surrey Water to understand the water quality of the bulk supplies we propose to take.</p> <p>Sutton and East Surrey Water have provided us with water quality information and we have considered how we can blend the water with our own supplies.</p> <p>We will continue to work with the DWI and Sutton and East Surrey Water during the development of the scheme. We have included in rWRMP Section 9.8I details of the further studies we intend to undertake in AMP6.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.8I.

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Individual	C22.10	Preferred Plan - WaterTransfers	Strongly support, both to achieve optimum cost and minimise environmental damage. Query if true Opex costs are shown.	<p>We welcome support for the transfers included in our plan.</p> <p>From an economic perspective the options have been shown to be part of an overall economic solution in both the WRSE modelling and our own analysis. We have used actual cost data supplied by donating companies, and in all cases there are carbon costs borne by the donating company as well as ourselves. Fixed and Variable OPEX costs are incorporated in the modelling.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Uckfield Town Council	P9.3	Preferred Plan - WaterTransfers	More information is needed about the environmental impact of building new pipelines from Kent. Company admits that much of the damage is irreversible.	The routing for the new pipelines is only preliminary at this strategic stage but this routing has aimed to minimise impacts on designated sites and ancient woodland. The Environmental Report identifies potential impacts for pipelines including those that can be mitigated and those that could cause irreversible effects, such as where pipelines pass through ancient woodland. The Environmental Report recommends that further detailed assessment and routing is undertaken for the pipelines in discussion with relevant stakeholders.	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent Downs AONB Unit	G7.9	Preferred Plan - WaterTransfers	Concern about extension to Bough Beech Reservoir (Sutton and East Surrey Water) within AONB. Needs to be resolved. Any new infrastructure in AONB will impact on landscape - pipeline restoration is inadequate for some habitats and may take years to recover, if ever.	<p>The reliability of transfers was initially identified through the WRSE modelling, and since then we have had further discussions with donor water companies to ensure the transfers are reliable under design conditions. In particular we have undertaken initial work with Sutton and East Surrey Water on two transfers which are presented in both companies' rWRMP14s and which may be linked to an extension at Bough Beech Reservoir.</p> <p>By working together with Sutton and East Surrey Water, our revised SEA for the rWRMP14 has considered cumulative impacts and we have worked with SESW to try to ensure that SEA objectives are met.</p> <p>The routing for the new pipelines is only preliminary at this strategic stage but this routing has aimed to minimise impacts on designated sites and important habitats. The Environmental Report identifies potential impacts for pipelines including those that can be mitigated and those that could cause irreversible effects, such as where pipelines pass through areas of important habitats. The Environmental Report recommends that further detailed assessment and routing is undertaken for the pipelines in discussion with relevant stakeholders. We will work with the local planning authority, Natural England and Sutton and East Surrey Water during the development of the scheme to fully understand the constraints and opportunities in the delivery of the scheme, including an assessment of potential environmental effects.</p>	<p>Clarification provided in the Statement of Response. No changes to the plan considered necessary.</p> <p>SEA/HRA updated to highlight concern over Bough Beech to clarify commitment to additional assessment and stakeholder consultation in next AMP period.</p>
Natural England	RI.30	Preferred Plan - WaterTransfers	Inconsistencies between Company plans regarding WRSE options and timings - bulk transfers in SEW and Thames Water's dWRMP14s and design of Aylesford water re-use scheme. Inconsistency must be resolved before final plan submission.	<p>Since the publication of our dWRMP14 we have worked closely with neighbouring water companies to align our plans regarding bulk transfers and shared resources.</p> <p>We have now agreed the details of these schemes with neighbouring companies and our plans are consistent. We have included details in rWRMP14 Section 9.</p>	Changes have been made to Section 9 in the rWRMP14 to include text agreed with other water companies.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Environment Agency	R2.9	Preferred Plan - Water Transfers	<p>Recommendation 6a - Water Resources in the South East transfers and options</p> <p>WRSE modelling provides best available evidence on strategic transfers in South East. Expect companies to adopt WRSE outcomes of modelling and justify any departures. Several WRSE transfer schemes included in dWRMP14. Should make sure transfers are included consistently in final WRMP. Should confirm capacities, utilisation and timings with respective donor and recipient companies. EA have provided a list of transfers they consider should be included in the WRSE water company's plans. Company should consider these transfers and demonstrate in final plan how these schemes will be included consistently.</p> <p>Encourage SEW to consider whether larger capacity infrastructure could be included to allow future increases in the transfers if it is demonstrated to be cost effective and lead to higher resilience. If schemes cannot justifiably be planned to higher capacity at present, SEW could consider whether, or how, schemes can be conceived to allow a potential increase in the future. Would like to see all new water transfer options built bigger (i.e. more capacity) for future flexibility.</p>	<p>The dWRMP14 (Table 9.1) included all the relevant transfers on the Environment Agency list (Appendix 3d). The capacities, utilisation and timings have been agreed with the donor companies and are included in our rWRMP14.</p> <p>The conceptual design for all our water transfer options is based on a maximum economic velocity of 1.3 m3/s.</p> <p>In a number of cases our list of feasible options includes variants with larger transfer capacities (e.g. Outwood to Whitely Hill). These larger capacity options were not selected by the WRSE model indicating that increasing the capacity would not be cost effective. Furthermore, in determining pipeline and pumping capacities, it has been assumed that pumping will be limited to 18 hours per day to achieve the peak deployable output. The primary reason is to provide flexibility in the use of off-peak electricity tariffs. In practice this means that the pumped water transfer options have a built-in resilience factor in that it would be possible to transfer 33% in excess of the assumed peak deployable output when pumping over the full 24 hours.</p> <p>During the development process for water transfer schemes we will consider whether, or how, such schemes can be conceived to allow a potential increase in the future.</p>	<p>Clarification provided in the Statement of Response. Further details around the transfer schemes are included in rWRMP14 Section 9 and detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.</p>

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Ofwat	R4.2	Preferred Plan - Water Transfers	Welcome inclusion of transfers and resource sharing schemes identified through the WRSE project. Need to ensure in the final plan that the water transfer schemes are consistent with those in associated companies' final plans.	Since the publication of our dWRMP14 we have worked closely with neighbouring water companies to align our plans regarding bulk transfers and shared resources. We have now agreed the details of these schemes with neighbouring companies and our plans are consistent. We have included details in rWRMP14 Section 9.	Clarification provided in the Statement of Response. Further details around the transfer scheme is included in rWRMP14 Section 9 and detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Albion Water	W1.2	Preferred Plan - Water Transfers	Support regional approaches to resource management and bulk supply arrangements.	We welcome the support received for the preferred plan.	No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Albion Water	WI.15	Preferred Plan - WaterTransfers	Plans remain dependent upon internal performance and regional co-operation. Where adverse weather, likely that companies will be suffering water shortages at the same time. Do not exhibit resilience.	<p>We have included further transfers from Thames Water; Sutton and East Surrey Water; Portsmouth Water and Southern Water in our preferred plan.</p> <p>The WRSE modelling has identified these options are realistic; however we are undertaking further studies with the donor companies to ensure that the water is available. During periods of drought there will be pressure on those resources, and we have undertaken work to ensure our customers' levels of service are met. We expect that in some cases the supplies will not be available at the full quantity when temporary use bans are in place.</p> <p>Some of the transfers are dependent upon other strategic schemes (such as the raising of Bough Beech reservoir) and we have worked with other companies to ensure we understand the timing and risks of those schemes.</p> <p>We are also proposing schemes that are resilient; including two water re-use schemes, a desalination scheme and additional reservoir storage. These schemes will help ensure we have a balanced mix between transfers from neighbouring companies and resilient supplies.</p> <p>The inclusion of our alternative options to our preferred plan options means that we have been able to identify when we need to start investigating alternative options so that customers' supplies are maintained.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Environment Agency	R2.26b	Preferred Plan - WaterTransfers	Company should clarify two new transfers with Affinity are in baseline and preferred plan and if they are, provide further information.	Since our dWRMP14 we have consulted with Affinity Water on existing and new transfers. Affinity Water has confirmed that no new transfers are required and so they have been removed from our preferred plan in the rWRMP14.	Change has been included in our preferred plan rWRMP14 Section 9.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Kent Wildlife Trust	G6.15	Preferred Plan - Water Treatment Works	Require stringent assessment of environmental impacts. Demonstrate environmental as well as economic benefit to improvements to water treatment works rather than tackling water resource and quality issues at source. Consideration given to savings to be made through improvements in water quality before treatment, though working in partnership at a catchment level to achieve reduction of inputs.	<p>Catchment management studies and catchment wide water quality initiatives are being implemented in AMP6 and are included in the National Environment Programme (NEP).</p> <p>In addition to this we have identified, through the WRMP14 process, the need to make improvements to some Water Treatment Works to ensure that they operate efficiently and effectively. We have undertaken high level environmental assessment as part of options appraisal and screening aimed at considering a range of possible option types covering water treatment, resource and demand management options. The relative economic benefits have been taken into account through the modelling informing the selection of options for the Plan. We are committed to undertaking more detailed environmental assessments through AMP6 as set out in rWRMP14 Section 9.81. Options taken forward will be subject to further stakeholder discussion and, if required, the studies required for licensing, EIA and planning permission.</p>	<p>Clarification provided in the Statement of Response. No changes to the plan considered necessary.</p> <p>Additional explanation on planned catchment management through NEP has been added to the SEA/HRA.</p>
Environment Agency	R2.8	Preferred Plan - Water Treatment Works	<p>Recommendation 5: Extension to existing water treatment works in WRZ4</p> <p>Unclear from dWRMP14 whether the proposed scheme is within the existing abstraction licence limits. If it extends beyond current abstraction licence there may be environmental issues. Company has not considered this in its assessment of environmental impacts, options screening, or SEA. Company should confirm whether the scheme remains within the conditions of its licence and if not, should review the environmental assessment of this scheme.</p>	<p>We have provided a detailed response to the EA separately, including an updated dossier on this option.</p> <p>We confirm that the proposed scheme is within the existing abstraction licence limits.</p>	The dossier has been updated and is available from our offices. No other changes are necessary to the rWRMP14.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Individual	C22.2	Preferred Plan - An Estimate of Costs	There is not a proper accounting of the costs and benefits in option appraisals. Abstraction charges do not reflect the volume and scarcity of water. Walker review shows that current water charging is socially regressive. Need for clear and transparent targets to remedy this.	The costs and benefits of options have been calculated in accordance with the guidelines set by our regulators. We account for abstraction licence charges in accordance with the current abstraction licensing regime. This current system does not reflect the volume and scarcity of water but there is work on going by Defra, the Environment Agency and Ofwat to seek to address this by reforming the current abstraction licensing regime. We will make every effort to ensure we fully comply with any future changes to the abstraction regime, but until we know what the planned reform to this system will be like, we can do no more than comply with the existing system.	Text has been added to rWRMP14 section 8 to explain that the economic modelling undertaken by ourselves and WRSE considered a range of costs and benefits, including initial construction costs, environmental and social costs and benefits (including Carbon), capital maintenance and operational costs.
Kent Downs AONB Unit	G7.10	Preferred Plan - An Estimate of Costs	Pressure to keep customer bills low and shareholder pressure for high dividends can mitigate against good long term investment decisions and piloting of unproven methods. Call for greater transparency in the information available on the allocation of resources for new investment and research, cost to the customer and profits to investors.	Our plan represents best value in terms of balancing cost, risk, customer preference, environment and resilience whilst ensuring a reliable water supply for the future. We have fully complied with the WRMP guidance.  We have committed in our plan to pilot and investigate a number of methods for the future during the period 2015 to 2020 e.g. catchment management pilots; water re-use investigations; regional transfer investigations and water efficiency partnership initiatives. These are described in Section 9.81 and the outcome of these will ensure our future plan is deliverable and reliable.  We carried out extensive engagement and consultation throughout the WRMP development process, for instance the EFG, to ensure our process was as transparent as possible.  Transparency of information is already planned to be provided in the Company's Business Plan that will be published in December 2013.	Clarification provided in the Statement of Response. No changes to the plan considered necessary. Information beyond scope of WRMP14 and will be published instead with Business Plan in December 2013.



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Natural England	R1.14	Preferred Plan - An Estimate of Costs	Plan should be amended to clarify whether the mitigation and enhancement is included within the costings for Arlington and Broad Oak reservoir options.	Mitigation and enhancement measures and land purchase costs have been included in the costings for all options where applicable, including Arlington and Broad Oak reservoirs. These were extrapolated from a range of examples of detailed reservoir costings and include specific provision for mitigation and enhancement including compensatory habitat creation.	Clarification has been added to rWRMP14 Appendix 7 and the updated Environmental Report. No changes to the plan considered necessary.
Consumer Council for Water	R3.7	Preferred Plan - An Estimate of Costs	SEW's stated aim to provide the best value plan is not the least cost. Disappointed not to see a breakdown of how this dWRMP14 affects customers' bills. Helpful to show the costs associated with the preferred plan as a proportion of the average bill, and how level of investment in 2015 to 2020 compares to 2010 to 2015. Difficult to judge if plan is affordable.	<p>In December 2013 the Company will submit its Business Plan proposals to the economic regulator Ofwat that will cover investment requirements for the period 2015 to 2020. Water resources management plan investment is part of the Business Plan submission.</p> <p>The level of supply demand investment in the Business Plan required to deliver the water resources management plan for the period 2015 to 2020, is very close to the same level of investment included in the last Business Plan for 2010 to 2015.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary. However text has been added to the Executive Summary and in the rWRMP14 section 9 confirming affordability of plan as the investment is part of overall plan with no bill increases, net inflation.
Ofwat	R4.6	Preferred Plan - An Estimate of Costs	SEW has engaged with customers in the pre-consultation period but it is not clear whether the company provided customers with an indication of the potential impact on bills of its dWRMP14 proposals and other scenarios in the pre-consultation period.	The Business Plan submitted in December 2013 indicates that there is likely to be no increases to customer bills during the 2015 to 2020, net of inflation. On this basis the water resources management plan affordability will be unchanged from present.	
Surrey County Council	A8.8	Preferred Plan - An Estimate of Costs	Requests further details of what will be the cost of the plan for customers?		
Kent County Council	A14.16	Preferred Plan - An Estimate of Costs	Queries high cost of dWRMP14? Crucial that impact on customer bills to be included in the WRMP.		

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Ofwat	R4.4	Preferred Plan - An Estimate of Costs	Set out the least cost plan clearly and explain how and why its preferred plan differs from the least cost plan. It is not clear how willingness to pay findings are consistent with moving away from the least cost plan.	We do recognise that we need to make the commentary round the preferred plan and least cost plan much clearer in the updates to our draft plan. We have revised Section 8 to clarify the process whereby we have progressed from the notional regional least cost plan from the WRSE Group modelling to our preferred plan. Adopting our revised Phase 2 baseline run (Scenario 20) as our preferred plan ensured we had: effectively adopted the 'least cost' plan; taken proper account of customer preferences in terms of options selected; had met the environmental test provided by our SEA; and, selected options from the list of most robust and reliable options available. Our preferred plan does not therefore move away from this 'least cost' plan.	Clarification has been provided in the Statement of Response. Several changes have been made to rWRMP Section 8 to clarify the process followed.
Ofwat	R4.9	Preferred Plan - An Estimate of Costs	Cannot find evidence that South East Water has considered the potential for new resource options to be more cost-effective than existing sources of water.	<p>Analysis was done but is not reported in the plan. We have added the information below in Appendix 8.</p> <p>Our optimisation model considers the costs of our existing water resources against the costs of new schemes. Initially our plan includes the development of more groundwater options and these can be cheaper than our existing sources. However, the increase in demand means that our existing sources are quickly fully utilised. Later on our plan includes schemes with higher capital and/or Opex costs and the AISCs of the options are more expensive than our existing sources. In some cases the options are so expensive that they are only used to manage peak demands rather than provide a base deployable output.</p>	We have added text to rWRMP14 Appendix 8 with more information on our preferred plan.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Kent County Council	A14.14	Preferred Plan - Carbon Emissions	Appendix 8 - queries increase in carbon emissions to 2040 which is in contrast to other water companies? Has the right balance been struck between carbon-negative demand management options and carbon intensive infrastructure? How do SEW's higher levels of service for drought orders affect the carbon emissions associated with dWRMP14?	<p>Overall the PCC for the company is declining during the plan as a result of our baseline water efficiency work, changes in appliance efficiency, our metering strategy and water efficiency options. The increase in carbon presented in our plan is as a result of increasing population.</p> <p>We believe we have struck the right balance between demand management and supply, and our research suggests that customers support our approach. Our plan includes carbon costs as part of a wide range of considerations that contribute to the economic analysis of each potential option. As carbon costs, determined using government guidance available at the time, are relatively low compared to other costs such as construction capital costs and capital maintenance, carbon is not often the overriding determining factor. Appendix 7D provides additional information about the carbon costing methodology used.</p> <p>The impact of levels of service on carbon has not been modelled at this stage as there is uncertainty regarding the utilisation and power consumption of the key schemes (such as water re-use and desalination). Further work proposed in AMP6 and AMP7 (described in Section 9.81 of the rWRMP14), will provide much greater confidence in the carbon costs and allow us to undertake detailed modelling.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Institution of Civil Engineers South East England Water Panel	G8.15	Preferred Plan - Carbon Emissions	Like to see SEW discuss overall impact of the proposals on its carbon emissions.	Information on the carbon impacts of our proposed plan is included on pp38 in rWRMP14 Appendix 8.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Dartford Borough Council	A13.1	Preferred Plan - Robustness	Requests that SEW ensure the WRMP is resilient, with specific reference to WRZ6.	<p>Water resource zone 6 is linked to other resource zones via transfers, and because of the improved integration of our system, many of the options in these other zones provide resilience in WRZ6.</p> <p>Sections 1 and 9 of the plan explain our objectives to improve resilience of our supply network. Our preferred plan deliberately moves away from new groundwater sources and ensures we are not reliant on one type of source of supply by including within the preferred plan an improved mix of sources of supply.</p> <p>Our target headroom analysis also ensures a level of resilience against the inevitable uncertainty of our assumptions.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Ouse and Adur Rivers Trust	G3.4	Preferred Plan - Robustness	More consideration could have been given to climate change and its effects, in particular more extreme weather patterns in the future.	<p>As described in Section 3 and 4 of the rWRMP14 we have undertaken an assessment of the impacts of climate change on supply and demand in accordance with best available guidance. Our baseline estimate of climate change impacts is included in our supply demand forecast but there is a lot of uncertainty about the impacts (particularly on supply) and this uncertainty is included in Target Headroom. The uncertainty from climate change within headroom is set out explicitly in the WRP tables which are published as part of the rWRMP14.</p> <p>Our preferred plan, dWRMP14 Section 9, includes options which are resilient to climate change which means our preferred plan does not increase our risk from weather changes.</p> <p>We are committed to undertaking further studies on the impacts of climate change on supply and this is set out in Section 9.81.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary. Details of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Ofwat	R4.5	Preferred Plan - Robustness	Present evidence from sensitivity tests clearly to show that preferred plan is robust against different schemes and programme risk scenarios.	We have undertaken sensitivity analysis for our rWRMP14 and this is presented in rWRMP14 Appendix 9. The results show that our plan is robust against a broad range of sensitivity tests which we have discussed with the Environment Agency and EFG.	Further information on our sensitivity testing has been included in rWRMP14 Appendix 9.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/ SEA /HRA
Kent Downs AONB Unit	G7.1	Preferred Plan - Robustness	Suggest 25 year plan should prioritise and start from the premise of: reduction in demand; maintenance of existing infrastructure; improving quality of water supply at source (ecosystem services approach).	<p>We welcome this comment and consider it supports the approach set out in our rWRMP14.</p> <p>Our dWRMP14 includes reduction in demand from the start (including metering, leakage and water efficiency) alongside maintenance of existing infrastructure.</p> <p>Through the National Environment Programme agreed with the Environment Agency, we have committed to explore and develop fully catchment management strategies (ecosystem services approach) during the next AMP 2015 to 2020. The aim is to improve raw water quality in our supply area.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
CPRE Kent	G9.2	Preferred Plan - Robustness	5 Year Plan 2015-20 - Deliver just sufficient incremental capacity to cover forecast demand growth for 2015-20. No improvement in supply/demand balance or scope to enhance security of supply or level of service. As such it is a relatively high risk strategy. When drought conditions, put at risk river and wetland habitats. Concerns about the viability of groundwater schemes at Forest Row and Coggins Mill which could reduce base flows supporting Medway and Rother base waters. For Forest Row, this could affect the drought output of Bewl Water. Taking into account irrigation requirements and climate change uncertainty, preferred plan is unlikely to be drought resilient or improve current level of service for Kent's customers. Inter-zonal transfers not normally regarded as secure components of a drought contingency strategy, especially for more severe regional scale episodes.	<p>As the representation states, the WRMP does meet the supply demand deficit in AMP6, but does not build significant capacity above target headroom. Our customer research suggests that customers are not in favour of better levels of service if it increases bills. Managing the supply demand balance so tightly does mean there is some risk, however we believe we have a better understanding of the risks in our plan than we did at PR09 and have reduced overall risk by undertaking more detailed work on key supply demand balance components, such as Outage and Process Losses.</p> <p>In the longer term, strategic schemes at Aylesford, Peacehaven, Broad Oak and Arlington will improve resilience, however these schemes will take time to be implemented and cannot be delivered in AMP6. Broad Oak and Aylesford will both improve resilience for customers in Kent in the longer term.</p> <p>In section 9.81 of the rWRMP14 we have made further commitments to our work with regulators and stakeholders to understand the risks of groundwater schemes in AMP6, including Forest Row and Coggins Mill to address the points raised in the representation.</p> <p>We are working with neighbouring water companies to ensure that agreements on bulk supplies are reliable in drought conditions, and these are affirmed in the text in Section 9 which confirms the arrangements with Southern Water; Sutton and East Surrey Water; Thames Water and Portsmouth Water.</p>	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Environment Agency	R2.13	Preferred Plan - Robustness	Improvement 1 - Scenario testing Company has undertaken some sensitivity testing but testing presented does not demonstrate that the preferred plan is robust relative to risks around the preferred schemes. Should clearly present evidence from the tests to demonstrate preferred programme is robust against different scheme and programme risk scenarios.	We have undertaken sensitivity analysis for our rWRMP14 and this is presented in Section 9 of the rWRMP14. The results show that our plan is robust against a broad range of sensitivity tests which we have discussed with the EA and EFG.	Additional text has been included in rWRMP14 Section 9.
Environment Agency	R2.41	Preferred Plan - Robustness	Minor Issue (11) Levels of Service - The company should clarify whether a 1 in 5 year scenario has been tested and overall, what information was provided to customers to facilitate WTP discussions and responses.	Further information on Levels of Service is included in Section 9 of the rWRMP14 and Appendix 9.	Additional text has been included in rWRMP14 Section 9.
Environment Agency	R2.27	Preferred Plan - Alternative Options	Improvement 15 - Alternative options Not produced an alternative plan, but alternative options. Provide evidence and demonstrate how, when and why alternative options will be used.	We have had further discussions with the EA and agreed a programme of work for strategic schemes and their alternative options.	Trigger diagrams for alternative options have been added to rWRMP14 Appendix 8.
Kent Wildlife Trust	G6.8	Preferred Plan - Alternative Options	Believe further improvements in demand management and water efficiency must also consider alternatives to any proposals that cause significant harm to the natural environment. Welcome recognition in risk assessment that long lead in times for new resources gives opportunity to bring forward alternatives. Need to fully assess alternatives to demonstrate least damaging solution has been chosen.	We support a twin track approach to water resources management and are proposing an ambitious approach to demand management, which includes universal metering, water efficiency and leakage reduction.  Our WRMP programme is developed by carefully compiling the best value programme having considered and valued the environmental impacts of all options.  Options with a long lead in will be reassessed each 5 years as part of the WRMP process. Section 9.81 of the rWRMP14 sets out the relevant studies we propose to undertake.	With the Environment Agency we have developed an approach to assess our alternative options and this is detailed in the rWRMP14 Appendix 8.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Wealden District Council	A3.2	Preferred Plan - Next Steps	Remind Company of importance that we do not stop, but continue and progress planning discussions with LPA and with communities on options as plans develop.	Building upon the working relationships already established during the preparation of the plan, we will continue to work with and engage with key stakeholders in the water resources planning process.	Clarification provided in the Statement of Response. Detail of the additional work that will be undertaken is included in rWRMP14 Section 9.81.
Wealden District Council	A3.3	Preferred Plan - Next Steps	Encourage early working with LPA on next steps with developing planning for options.	Given the long lead in time for the development of the larger strategic options, we consider that the opportunity to undertake surveys and assessment work to fully understand additional (and as yet unknown) constraints and potential adverse impacts of these options should be undertaken during the 2015 to 2020 period. This will include consideration of a broad range of environmental and social issues and we look forward to working with the relevant key stakeholders on these further studies.	
South Downs National Park Authority	A4.4	Preferred Plan - Next Steps	Encourage close partnership working between SEW and Council to ensure alignment between WRMP and SDNPA Management Plan policies.	In addition, we would welcome involvement in the local authorities' own local plan and management plan process, including the work to safeguard sites for the delivery of water infrastructure.	
South Downs National Park Authority	A4.5	Preferred Plan - Next Steps	Encourage early engagement between SEW and Council when schemes are developed to ensure potential adverse impacts on the landscape and other planning issues are fully addressed.		
Rother District Council	A5.7	Preferred Plan - Next Steps	Encourage working between SEW and the Council to ensure options taken into account in local plans.		
Lewes District Council	A7.7	Preferred Plan - Next Steps	Encourage early engagement between SEW and Council to ensure that the safeguarding of necessary sites for water resource infrastructure is included within the local plan process.		
Surrey County Council	A8.10	Preferred Plan - Next Steps	Encourages further engagement between SEW and the County Council on future plans and programmes.		
East Sussex County Council	A10.11	Preferred Plan - Next Steps	Requests early engagement and discussions with SEW to reduce risks to the environment.		





# Appendix 2 - Table 8I - Strategic Environmental Assessment

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Natural England	RI.24	SEA - General	Welcome progress on WRMP09 to date.	Comment is noted.	Comment is noted. No changes to the plan considered necessary.
Natural England	RI.10	SEA - Biodiversity	SSSIs: Statutory duty on water companies to take steps consistent with the proper exercise of their functions to further the conservation and enhancement of SSSIs. SEA objectives reflect the statutory duties (Table 6.1) but criteria questions focus on protection rather than potential for enhancement. SEA baseline - The condition of the company-owned SSSIs by percentage area is not provided in SEA baseline. SEA assessment of potential impacts of options and cumulative impacts on designated sites should have included reference to the SSSI favourable conditions tables. This should be undertaken to inform final WRMP14.	Additional information on the work we are undertaking to conserve and enhance company owned SSSI is provided in updated Environmental Report including current condition and proposed enhancement through the AMP6 NEP.The updated Environmental Report will reference SSSI favourable condition tables for the assessment.	We are providing an updated Environmental Report to accompany the rWRMP14.
Natural England	RI.19	SEA - Biodiversity	Biodiversity - Impacts on individual schemes have been identified and well described. Baseline refers to Nature Improvement Areas (NIA) but does not appear to have influenced options within the plan. Disappointing that opportunities to manage SEW's land holdings linked to South Downs NIA are not included in dWRMP14. Hope included in Business Plan.Welcome sustainability reduction on the River Stour.	Nature Improvement Areas have been considered in the individual options assessment sheets. We have a programme for studying and implementing chalk grassland enhancement within the South Downs NIA. This is included in the Business Plan as part of the NEP programme.A description of this programme has been added to Appendix 9 of the rWRMP14.	We are providing an updated Environmental Report to accompany the rWRMP14.This will clarify the implications for South Downs NIA and include a description of the programme of work, funded through the NEP, to provide enhancements to support the aims of the NIA.
Natural England	RI.21	SEA - Biodiversity	Protected Species - Pipeline routed through some of the most biodiverse parts of the South East where protected species are prevalent. Reference to Natural England's Standing Advice for Protected Species to help understand impact of development on protected or BAP species.	Advice is noted.	Advice is noted. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA /HRA
Natural England	RI.23	SEA - Climate Change	Adaptation to climate change not clearly drawn out.	The implications of the plan for climate change adaptation is further clarified in the Environmental Report and includes reference to the benefits of increased demand management and some of the wider catchment management initiatives through the NEP.	We are providing an updated Environmental Report to accompany the rWRMPI4. This includes an additional section stating more clearly how the plan performs with respect to climate change adaptation.
East Sussex County Council	A10.8	SEA - Constraints	Broadly supportive of objectives of the SEA and issues identified. Should take account of alert mapping such as Archaeological Notification Areas.	We welcome this support for our plan.	Support for our plan. No changes to the plan considered necessary.
English Heritage	R5.1	SEA – Constraints	The historic environment interest of wetland areas needs to be carefully considered as they may contain buried, waterlogged archaeological and palaeo-environmental (relict wetland) remains of significant interest and fragility. Such sites are vulnerable to new groundwater abstractions or increases on existing licences.	The potential for impacts on as yet unknown heritage remains, including their vulnerability regarding improved groundwater abstractions is noted. Avoidance of known heritage assets has been applied as our approach throughout the options assessment and Table 8.I of the Environment Report is updated to reflect this.	We are providing an updated Environmental Report to accompany the rWRMPI4. This clarifies the approach for developing appropriate mitigation strategies for protected heritage assets.
English Heritage	R5.2	SEA – Constraints	Overall, English Heritage would like to see a more detailed baseline for the historic environment in the SEA Report, with further quantification and qualification of the heritage assets in the area. If impacts on heritage assets are to be considered during the more detailed appraisal stage in the SEA process, a more detailed description of the heritage assets in the study area should be included. Recommends close working with local authority conservation staff.	We have considered avoidance of heritage assets as our approach throughout the options assessment and as explained in the Environmental Report. Table 8.I of the Environment Report is updated to reflect this and the general strategy to avoid impacts on valued heritage assets where possible.	We are providing an updated Environmental Report to accompany the rWRMPI4. This clarifies the approach for developing appropriate mitigation strategies for protected heritage assets.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA /HRA
Natural England	RI.18	SEA - Cumulative Assessment	Cumulative Assessment: Intention to undertake further cumulative assessment of the dWRMPI4 with other plans and programmes is welcome. Cumulative assessment requires significant additional consideration (e.g. reference to drought plans).	Cumulative assessment is included in updated Environmental Report taking account of other company dWRMPs, drought plans, local plans, and other relevant plans.	We are providing an updated Environmental Report to accompany the rWRMPI 4.
Natural England	RI.18	SEA - Cumulative Assessment	Cumulative impacts on landscape not sufficiently explored within plan or with other plans. Note intention to extend cumulative impacts assessment. Should be completed before final plan is submitted to ensure mitigation is possible. SEW should work with neighbouring companies and Protected Landscape Officers to produce Protected Landscape Mitigation Strategy for each AONB affected by multiple schemes. Study should address and mitigate any cumulative landscape impacts. Landscape mitigation in Tables 6.2 and 8.2 are limited in design and scope.	Further cumulative and in combination assessment has been undertaken within plan, with other company plans and also with other relevant plans. The development of Protected Landscape Mitigation Strategies for each of the AONBs affected together with the relevant stakeholders has been added to the Environment Action Plan in the Environmental Report.	We are providing an updated Environmental Report to accompany the rWRMPI 4. This clarifies the approach for developing appropriate mitigation strategies for protected landscapes.
Natural England	RI.20	SEA - Cumulative Assessment	Cumulative and synergistic impacts on biodiversity not sufficiently explored within plan or with other plans. Note intention to extend cumulative impacts assessment. Welcome mitigation in Table 8.1 on ancient woodland. Avoidance of ancient woodland should be added to mitigation measures. Many of the pipeline options have potential to damage habitats of principal importance for biodiversity. Mitigation is stated as reinstatement but avoidance of semi-natural habitats is preferable.	Cumulative impact assessment is reported in the updated Environmental Report including the within plan and other plan assessment. Avoidance of ancient woodland has been applied as approach throughout the options assessment. Table 8.1 is updated to reflect this and the general strategy to avoid impacts on valued habitats as the primary approach where possible.	We are providing an updated Environmental Report to accompany the rWRMPI 4. This includes a cumulative assessment and an amended Table 8.1.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Natural England	RI.16	SEA - HRA	Inter-company Transfer TRI 36a - Routed via Broadmoor to Bagshot Woods and Heaths SSSI, part of Thames Basin Heaths SPA. Mitigation is to build new service reservoir so pipeline can avoid SPA and SSSI. HRA lists transfer as having likely significant effect. HRA and SEA to clarify mitigation. If service reservoir cannot be moved then Natural England would have serious concerns.	The HRA takes the worst case scenario. A plan level appropriate assessment will be undertaken for this option as it stands. In addition, we will seek alternatives or variants to this option to avoid the extension of the reservoir. Further study of these variants will be undertaken alongside HRA/appropriate assessment during AMP6 along with alternative options and in discussion with Natural England. We are committed to avoiding significant adverse effects on the integrity of a European site.	<p>Clarification of mitigation measures is provided in the in SEA/HRA. These are linked to the plan level appropriate assessment in the HRA report and the identification of potential variants and alternatives which will be explored further. We are committed to avoid significant adverse effect on the integrity of SPA through option variants or alternatives as necessary.</p> <p>Clarification of further studies to be undertaken including timing of alternatives is included in rWRMP14.</p>
Natural England	RI.9	SEA - Mitigation	Table 8.2: Mitigation included is appropriate for biodiversity but limited for landscape impacts. Landscape targets should be amended and related to contribution to landscape character and effect (positive or negative) on special features of the protected landscape.	Further elaboration of potential landscape mitigation and landscape targets is provided in Table 8.2 and in the Monitoring Plan.	We are providing an updated Environmental Report with an amendment to Table 8.2 and monitoring plan to accompany the rWRMP14.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA /HRA
Natural England	RI.7	Developing Our Preferred Plan - SEA	SEA appears to have identified most of the relevant social and environmental impacts of constrained options. Objectives chosen reflect the statutory duties related to landscape and biodiversity. Option set appraised was large and environmental considerations have been used to influence the plan development. Information on how SEA influences the plan included in documents not linked to plan and not referenced in the SEA. Recommend that iterative process undertaken in plan development and influence of SEA objectives is more clearly drawn out.	<p>As suggested by Natural England, further explanation on how the SEA influenced development of the plan throughout the process and the selection of the preferred plan is provided in the Environmental Report and rWRMPI4 Appendix 8. The background dossier and assessment documents are referenced in the Environmental Report.</p> <p>We have added additional explanation to the Environmental Report on the appraisal process, taken from the earlier option appraisal and screening reports provided to the EFG, and how the environmental issues influenced this.</p> <p>In addition, further explanation is provided in the Environmental Report and rWRMPI4 Appendix 8 on how the preferred plan was developed, stating clearly how environmental issues were taken into account.</p>	Additional clarification has been added to the Environment Report and rWRMPI4 Appendix 8 on how the SEA has influenced the preferred plan development.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA /HRA
Environment Agency	R2.28	SEA – Preferred Plan	Improvement I6 - SEA Unclear how SEA influenced the final options set of the preferred plan. Company should demonstrate and explain if any options removed from preferred plan due to SEA or; whether SEA had any influence on the preferred plan. Company should commit to programme of testing and investigation around preferred groundwater options. Should include assessment relative to other company dWRMPs.	<p>The SEA has influenced the plan from the early option screening process through to the selection of preferred plan. It has also influenced the mitigation and monitoring measures identified for the implementation of the plan. Additional explanation is provided in the updated Environmental Report and Appendix 8 showing which options have been removed through the screening process and during the development of the preferred plan from the least cost scenario.</p> <p>Testing and investigation forms a component of the groundwater schemes. This has been reviewed and elaborated further based on more recent WFD water body status information made available by the Environment Agency. SEW are committed and have agreed a programme with the Environment Agency to undertake the investigation work and to bring in alternative options for ground water options where investigation in AMP6 shows deterioration of WFD status would result. This is explained more fully in the updated Environmental Report.</p> <p>Cumulative assessment taking account of other company plans is provided in the updated Environmental Report and additional mitigation and monitoring identified where relevant.</p>	<p>Additional clarification on SEA influence on the preferred plan development with changes logged is explained further in the updated Environmental Report and Appendix 8 to rWRMPI4.</p> <p>Additional clarification provided for commitment to testing and investigation and triggers to be used to bring in alternatives in relation to non-deterioration. Trigger diagrams for alternative options have been added to rWRMPI4 Appendix 8.</p> <p>Cumulative assessment section expanded in the updated Environmental Report.</p>

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Natural England	RI.11	SEA - Sustainability Reductions	Sustainability Reductions: Greywell Fen: Welcome inclusion of groundwater abstraction as a likely sustainability reduction in baseline model. Look forward to delivery early in the next AMP period (2015-2020). In interim, use of abstraction should be minimised within extant operational constraints. Beeding Hill to Newtimber Hill SSSI (Poynings stream):Welcome continuation of NEP research into the next AMP period to assess if changes made have addressed impacts within the SSSI.	Monitoring of the impact of abstraction at Greywell Fen will continue as part of our AMP6 NEP programme.The scope of monitoring is being developed in consultation with the Environment Agency and Natural England to ensure monitoring is relevant to the key SSSI features.  Monitoring will continue at Poynings as part of our AMP6 NEP programme. The purpose of this monitoring will be to monitor the sustainability of the current abstraction.The scope of this work has been designed in conjunction with both Natural England and the Environment Agency.	We are providing an updated Environmental Report to accompany the rWRMP14. Appendix 9 of the rWRMP14 also explains the work we intend to undertake in AMP6 (period 2015 to 2020) regarding the NEP.
Natural England	RI.22	SEA - Water Framework Directive	Water Framework Directive - disappointed that no plan level risk assessments against WFD objectives have been undertaken and evidence that WFD objectives have been taken into account is lacking. Recommend that assessment of potential/preferred options to cause deterioration or effects on ecological status or potential evaluated.	The WFD assessment is included in the individual option assessments provided in the Environmental Report along with a summary table. The conclusions are also reported in the rWRMP14. This includes reference to more recent information available from the Environment Agency on water body status and objectives since the dWRMP14 and SEA Environmental Report were published.	We are providing an updated Environmental Report to accompany the rWRMP14. This includes an expanded section on the Water Framework Directive section with the supporting individual assessment sheets.These demonstrate the evidence used for the assessment.



Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA /HRA
Environment Agency	R2.29	SEA - Water Framework Directive	Improvement 17 - Water Framework Directive Insufficient evidence that considered risk of deterioration from existing abstraction licences. Company should assess whether any planned increase in abstraction within existing licences could pose a risk in deterioration in water body status. Develop a plan for more detailed assessment in time to inform the company's final WRMP. Mitigation measures should be implemented and monitoring undertaken to identify if options likely to impact on WFD status. If impact identified, additional mitigation should be identified or alternatives sought.	<p>Risk of WFD ecological status deterioration from increased abstraction has been reviewed and elaborated further based on more recent WFD water body status information made available by the Environment Agency. We are committed to undertake the options investigation work and to bring in alternative options where investigation shows deterioration of WFD status would result. This is explained in the updated Environmental Report.</p> <p>Testing and investigation forms a component of the ground water schemes. These studies will develop our understanding of these options and will assess a number of environmental parameters. This work will be undertaken in AMP6 to ensure the schemes will only proceed if they can be shown to be capable of being operated without causing deterioration of water body status.</p>	Section 9 of the rWRMP14 references the conclusions of the WFD assessment included in the updated Environmental Report. The rWRMP14 and the Environmental Report also state our commitment to carry out further study of the groundwater options in AMP6 and to bring in alternative options if likely deterioration of status is found.



# Appendix 2 - Table 8J - Comments made on the Habitats Regulations Assessment

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Kent Wildlife Trust	G6.7	HRA - Appropriate Assessment	Endorse recommendations of the HRA screening report, that alternative options must be implemented if any preferred options would result in significant impact on European designated site.	Preferred plan options for delivery in AMP6 and AMP7 do not have the potential to impact on European designated sites. As a result of this we are able to undertake down the line assessments of specific options during AMP6. Funding for this work has been included within our Business Plan to be undertaken during AMP6. By undertaking this work during AMP6, we can ensure that where Appropriate Assessment indicates a preferred plan option would have significant adverse effects on European designated sites time is available to develop alternative options.	Clarification has been provided in the response. No changes to the plan are necessary.
Natural England	RI.5	HRA - Appropriate Assessment	Appropriate Assessment: Welcome SEW's intention to extend the HRA to include plan level assessment of the three preferred options identified as having a likely significant environmental effect upon a European site. This must be ready to inform the final WRMP. Welcome SEW's intention to pursue alternative options should HRA identify that option would not avoid adverse effect on integrity on any European site. Note the intention to delay some detailed assessments until 2015-2020. Any "down the line assessment" is only potentially acceptable if the specified criteria are met and should be carried out in time to inform the HRA of dWRMP19.	Reculver Desalination is not now part of the Preferred Plan. Plan level appropriate assessment is included for Windsor to Surrey Hills transfer TR136a. Justification for down the line appropriate assessment is provided for Aylesford Water Reuse, as this is a complex scheme and further HRA work will be undertaken in AMP6 (2015 to 2020) alongside more detailed feasibility studies.  This work will inform the next WRMP in 2019. Our approach will be to avoid adverse effects in European sites and bring in alternative options where necessary. We have prepared an updated HRA report that will sit alongside the final WRMP14.	Clarification has been provided in the response. An updated HRA report has been prepared alongside the final WRMP14.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Natural England	RI.4	HRA - Assessment Cumulative Effects	In combination and cumulative impacts:Welcome commitment to extend the screening report to include an assessment of in combination and cumulative impacts with other plans including other companies dWRMPs. This should include Shoreline Management Plans, Fluvial Management Strategies and water company drought plans in addition to local development plans. Report must be available to inform final WRMP.	An in combination and cumulative assessment has been undertaken to include consideration of other water company draft WRMPs, Shoreline Management Plans, Fluvial Management Strategies and other water company drought plans in addition to local development plans.We have prepared an updated HRA report that will sit alongside the final WRMP14.	Clarification has been provided in the response. No changes to the plan are necessary. An updated HRA report has been prepared alongside the final WRMP14.
Natural England	RI.2	HRA - Screening Criteria	Table 2.2: Assumption that physical development only likely to be significant where boundary of scheme extends within or is directly adjacent to the European site is not correct. Assumption that water pollution is limited to sources within 200m of the site is incorrect. Not clear if potential air quality impacts on roads near European sites have been assessed in the screening criteria. Table 2.2 should be clarified and option screens checked to ensure final options have been correctly assessed.	We have updated Table 2.2 of the HRA report, and clarified in the HRA report that the assessment of final options is correct. We have prepared an updated HRA report that will sit alongside the final WRMP14.	Clarification has been provided in the response. An updated HRA report has been prepared alongside the final WRMP14. The option screening set out in Table 2.2 of the HRA has been updated to reflect the assessment of options undertaken.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Natural England	RI.3	HRA - Screening Criteria	Table 3.2: Not all potential sensitivities of the European sites have been captured. Table 3.2 should be amended to include these and HRA updated to ensure preferred options screened against appropriate sensitivities.	Table 3.2 of the HRA report has been updated to clarify this, in line with the assessment of options undertaken.	A clarification has been provided in the response. An updated HRA report has been prepared alongside the final WRMP14. The option screening set out in Table 3.2 of the HRA and accompanying Appendix have been updated to reflect the assessment of options undertaken.
Natural England	RI.1	HRA - Screening Methodology	HRA Screening Assessment - Natural England welcomes the iterative screening approach taken through the options appraisal, and the steps taken to eliminate potential impacts from the design during the screening stages. Potential effects of option types have been correctly identified and most assumptions made in the screening methodology are reasonable.	The company is pleased that its approach is considered reasonable.	Clarification has been provided in the response. No changes to the plan are necessary.

## Appendix 2 - Table 8K - Other Comments

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Individual	C13.1	Other	The representation appears to be a series of one line responses to questions but these do not appear to correspond to any series of questions we asked as part of our consultation process.	We have contacted the customer and asked for clarification of the response received but have received no further contact from the customer at the time of publishing this report.	No changes to the plan are necessary.
Individual	C25.1	Other	Query not on the dWRMPI4, but specifically on a customer's intention to install a combi boiler.	We have contacted the customer and addressed their query accordingly outside of the statutory WRMP process.	Clarification has been provided in the response. No changes to the plan are necessary.



# Appendix 2 - Table 8L - Comments made on Other Matters

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPl4/SEA/HRA
Kent Downs AONB Unit	G7.5	Other Matters - Agricultural Irrigation	Would support drive for all agricultural irrigation to become self-sufficient through use of irrigation reservoirs, grey water collection, recycling and treatment on site.	Based on our own studies, and supported by other research, we have retained, in our demand forecast, increasing supply to agriculture and horticulture over the 25 year life of the plan. This amounts to an additional 14Ml/d, or an 11% increase in total non- household demand by 2040.  Were we to observe agricultural irrigation becoming more self-sufficient in the future, then there will be scope to course correct and amend our forecast accordingly in future WRMPs. At this juncture however, it is appropriate that we retain our forecasting assumptions.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Ouse and Adur Rivers Trust	G3.7	Other Matters - Customer Bills	Demand management is commendable but water companies are losing revenue by having to supply customers who do not pay. Current legislation does not allow companies to install flow restrictions in these cases. A change in the law would have impact on water usage and costs and remedy the unacceptable situation where those who act responsibly subsidise those who do not pay.	We acknowledge this as a very valid and challenging issue. There are customers who can't pay their full bills, and we offer those customers support through a number of schemes. Anyone who can't pay their bill is advised to contact our customer services team for more information.  There are also customers who can pay and simply won't pay – recently the company has started to take a harder line with these customers including taking legal action in a number of cases and with good success.  Through our approach to this important issue, it is hoped we can have a positive impact and reduce the numbers of customers who do not pay their bill. We will continue to raise awareness of all our customers of the levels of service and support we continue provide to them, and hope that increasing awareness might them make more willing to pay in the future.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Ashford Borough Council	A6.8	Other Matters - Developer Contributions	New infrastructure and developer contribution. Plan is silent on contributions and infrastructure funding assumptions to assist LPA in infrastructure planning.	<p>We acknowledge that the setting of developer contributions or the level of Community Infrastructure Levy (CIL) is largely a matter for the individual local planning authority based on local circumstances.</p> <p>It is our duty and obligation under legislative provisions to supply water to customers and to maintain and develop its asset base. As such our infrastructure is funded through a separate mechanism and overseen by Ofwat, the water industry's regulator.</p> <p>We wish to fully engage with local authorities to allow a full understanding of the complexities of planning for water resources. Unlike other infrastructure development, it is not possible to make provision for water on a piecemeal basis, as and when new development is proposed. The need for new water resources does not stem purely from new development when the payment of a developer contribution may apply. The demand for water is influenced by increases in population and non-household demand (that will happen with or without new development) and, existing water supplies are affected by a number of factors including climate change and sustainability reductions brought forward by the Environment Agency.</p> <p>We are committed to working with Local Planning Authorities across our supply area, in accordance with their Duty to Co-operate, to ensure that planning policies that support the future provision of water supplies are secured.</p> <p>We ask that local authorities support the proposed development of new water resource schemes, improvements to the water supply network and demand management measures that are needed to meet current and future water supply needs, meet the challenges of climate change and protect the environment. We will work with the local authority and the Environment Agency to assist in the timely delivery of schemes. Sites that are identified for water resource schemes through this WRMP and by the Environment Agency as being required to deliver necessary water infrastructure should therefore be safeguarded and allocated within Development Plan Documents.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Ashford Borough Council	A6.8			<p>Any Infrastructure Delivery Plan (IDP) prepared by an individual local authority will generally include a requirement that developers will be required to work in partnership with utility providers to provide appropriate infrastructure for new development, paying any relevant contribution for necessary improvements to water companies. South East Water would fund all subsequent maintenance, repairs and upgrades of infrastructure.</p> <p>The IDP should be kept up to date through liaison between the local authority and South East Water so that planned infrastructure is made known and the need for new or upgraded distribution mains is identified. It should also record that developers will be expected to set water efficiency standards for new development to address limited water resources in the local area with a high and growing demand for water.</p> <p>We are committed to working with local authorities to ensure that appropriate water supply infrastructure is in place.</p>	
Individual	C19.1	Other Matters - Fluoridation	Consider tighter restrictions should be imposed to control the level of contaminants in water, including the banning of fracking and other toxic pollutants.	<p>We continue to work closely with the Drinking Water Inspectorate and the Environment Agency to deliver safe and reliable supplies to our customers. In principle, we will always support proposals that have the effect of tightening the control of contamination risk in catchments we abstract from for public supply.</p> <p>Our response to concerns raised regarding fracking is provided in Appendix Table 8A of this SOR. At the present time we are not required to fluoridate our water supplies.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Surrey County Council	A8.7	Other Matters - Highways	Highlights a need to manage impacts on highways, and minimise highways impacts in respect of works to improve and maintain SEW plant. Standard of reinstatements and high quality of work are encouraged. Request early engagement with Highway Authority in line with the County Council's new permit scheme.	<p>During the past few years we have successfully operated and delivered schemes under Kent County Council's permit scheme. The company is very confident that the transition to the permit scheme operated by Surrey County Council will be relatively straightforward.</p> <p>We put great importance and effort into undertaking early engagement with communities, businesses, Highway Authorities, Local Authorities and many other stakeholders prior to embarking on the delivery of major works on the ground. This is to ensure that impacts are kept to an absolute minimum.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Wokingham Borough Council	A1.3	Other Matters - Sewerage	Concern about increase in population, loss of green space and knock on effects relating to capacity of sewerage system and run off impacts of new development. Further information in relation to these issues and type and potential impacts of the works requested in the dWRMP14.	<p>We consider that the dWRMP14 satisfactorily addresses the points raised in relation to new development and the increase in population in Section 4 – Demand Forecast.</p> <p>With regard to 'sewerage system run off impact on new development', this sits outside the scope of the WRMP. South East Water's influence and input to sewerage run off systems is limited because we are a water supply only company, but where we can contribute effectively to discussions around this matters, we have taken those opportunities to comment.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Individual	C2.1	Other Matters - Water Ownership	Refers to the phrase 'my water' which has been used by South East Water. Suggests that the phrase portrays a fraudulent claim as to the ownership of the water and asks that this claim be justified.	<p>We acknowledge that it is customers' water, which is why customers' views are important in helping influence any decisions that are taken about how it is managed for the customers of today and tomorrow.</p> <p>Nevertheless, our Regulators and Government accept that customers should help pay towards the cost of abstracting water; treating it so it is safe to drink, and sending it around thousands of miles of pipe in sufficient quantities direct to their taps.</p> <p>For future plans to be seen as credible we need to deliver what customers' value and at a price they are willing to pay. The phrase that has been commented upon is designed to encourage customers to participate in that debate to think beyond their tap - and tell us about the types of options we should be investing in to help secure their future water supplies.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.
Individual	C3.1	Other Matters - Water Quality	Concerned about past, undisclosed deaths from chlorinated by-product poisoning. Current tap water distribution system poses a terrorism threat. Defra refuses to stop unnecessary chlorine contamination. Proposes that an alternative drinking water distribution system be devised, using unpolluted sources that can be distributed in a secure manner:	<p>Delivering a safe and secure supply of water is our priority. Our regulators set the standards for disinfection and we adhere to them. Chlorination is the safest method of disinfecting water and has been used for many years. We are not aware of any deaths resulting from drinking chlorinated water.</p> <p>The water distribution network is pressurised and meets all current statutory requirements. We continuously modify our systems as a result of changing circumstances, including terrorism threats.</p> <p>Developing a new system of un-disinfected water would be prohibitively expensive and would put customers at risk from microbial contamination. None of our customer research has indicated that our customers or regulators share this concern or would be willing to pay for a separate system.</p>	Clarification provided in the Statement of Response. No changes to the plan considered necessary.

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMPI4/SEA/HRA
Individual	C22.4	Other Matters - Water Trading	Ofwat should be asked to support and enforce water trading, so that least damaging solutions can be used and ensuring water companies are encouraged to innovate using NEGAlitres and other aspects such as leakage and AIM. Supports CIWEM's report, "Re-framing Sustainable Development: A critical analysis".	We consider that water trading options were given due consideration in South East Water's WRMP. The guidelines issued by Ofwat and the Environment Agency required water companies to publish a statement of water need and availability before preparing their draft WRMPs and to invite third parties to offer up options (supply side and demand side) to be considered in the WRMP. In addition, the WRSE modelling group invited all the water supply licensees in England, Wales and Scotland to offer up water trading options for modelling. We also wrote to all the large private abstraction licensees in its area to ask if they wished to offer water trading options too. We understand that our regulators are currently reviewing their requirements for future WRMPs and we will fully comply with these.	Clarification provided in the Statement of Response. No changes to the plan considered necessary.





# Appendix 2 - Table 8M - Comments Relating to Water Resources Planning Tables

Representation Received From	Representation Reference	Comment Type	Summary of Comment	Our Response	Changes to dWRMP14/SEA/HRA
Environment Agency	R2.31	WRP Tables	Minor Issue (1) WRP2 Tables - The company should review inconsistent representation of demand forecast micro-component data and ensure representation in the final plan is consistent across appendices and the main text.	There were errors in the version 1.6 of the WRP tables which resulted in some inconsistencies across the industry. This issue will be addressed with the latest version 2.0 in rWRMP14.	Updated WRP2 Tables submitted with rWRMP14.
Environment Agency	R2.24	WRP Tables - Preferred Plan - An Estimate of Costs	Improvement 12 - Cost Economic analysis undertaken by consultants for the Environment Agency. Based on the comparison of AIC with industry average and has highlighted many cost outliers. Errors in Tables WRP3a, 3b and 3c and this could affect the analysis. Tables should be reviewed and issues resolved before final plan published. Not clear how costs shared for inter-company transfers and shared schemes. Costs should be clarified. Not considered cost uncertainty in the sensitivity analysis. To improve robustness of Plan, recommend company undertake sensitivity analysis in respect of option cost assumptions.	<p>The version 1.6 of the WRP tables had formula errors which have been addressed with the latest version 2.0 which will be used in rWRMP14. In addition, the company is reviewing its cost calculations to ensure consistency with assumptions and the overall plan.</p> <p>With regard to the option cost assumptions and sensitivities, the company has worked with the WRSE and their modelling exercise which has considered option costs sensitivities and we have reviewed these outputs in the context of our preferred plan and scheme timings. We have not however carried out a separate sensitivity test exercise as we consider the work completed by the WRSE Group was sufficient for our purpose.</p>	Updated WRP2 Tables submitted with rWRMP14.