# RSS EXAMINATION IN PUBLIC SOUTH EAST

## STATEMENT BY CPRE KENT: PARTICIPANT 7150

## MATTER 1E – WATER

---

**1E.1 Given that the EA modelling shows that much of the region will be in deficit by 2025, what is the evidence that a twin track approach of demand management and investment will meet the water supply needs of the region. (Policy NRM 1)?**

1.1. CPRE estimates for the South East Region indicate a 1 in 10 Dry Year supply/demand deficit exceeding **1000 Ml/d** by the end of the plan period (1). This deficit is estimated from increased demand from new development, combined with reductions in available supply from existing resources due to the need to comply with the Water Framework, and Habitats Directives. It is our view that a short-fall of this magnitude cannot be effectively addressed other than by a broad-based strategy, comprising both water efficiency and a range of resource development components.

1.2 Water efficiency measures alone, from metering and water saving actions would probably not cover more than at most **220 Ml/d** of the deficit. This pre-supposes a further 75% domestic metering combined with a tariff structure to encourage less use in peak periods. It also assumes basic water-saving fittings such as dual-flush toilets, and low flow (air-entrained) taps, in most existing homes and more comprehensive water efficiency measures in new build homes.

1.6 Based on the latest OFWAT leakage control targets, a saving of approximately **100 Ml/d** is probable (mainly in the Thames Water supply area). Although much of this applies to the London part of the Thames Water demand area, there are knock-on effects to the rest of the Thames Water supply system.

1.7 While we have grave doubts about the hydrological and environmental viability of several of the reservoirs schemes being considered by Water Resources for the South East (WRSE), it is probable that existing proposals and extensions would contribute a further **100 Ml/d** though supply to reducing the deficit. The rest of the deficit would need to be addressed through a combination of indirect re-use of treated effluent, and strategic raw water transfers between adjacent river basin areas, and by commitment to development being conditional on further water efficiency measures. Although all of this is possible CPRE believes that the uncertainties, costs and impacts of these measures have not been given due weight in the Plan.

(1) A Water Resource Strategy for the South East, Summary of Draft Report by Graham Warren, CPRE

**1E.2 In terms of water efficiency what else needs to be done at regional level to ensure that demand for water can be controlled and provided for. Is something more practical required in terms of monitoring and implementation?**

2.1 Policy NRM 1 refers to the need for water efficiency, but does not specify the type of actions needed [and in fact BREEAM 'very good' can be achieved without any action on water]. The Sustainability Appraisal of the Plan identified water as one of the four biggest potential environmental impacts of the Plan.

2.2 There is an increasingly urgent need for legislation empowering local authorities to make the grant of planning / building consent conditional on the installation of specified water-saving fittings (dual-flush toilets, low head showers, low flow taps and, where feasible, rainwater storage). Given the levels of growth proposed in the Plan, it is essential that rigorous policies are implemented which require Local planning authorities to demand specified water-saving fittings in all new development. The South East has the opportunity and the imperative to take the lead in raising national standards, and we consider that this opportunity must not be missed. Large areas of the south east have already been identified by the Environment Agency as having an unsustainable balance of both surface and groundwater resources.

2.3. The final version of the Implementation Plan, which is an integral part of the Plan, goes into a lot more detail about what needs to be done. However it is clear that delivery of much of what is required is outside the remit of the South East Assembly and its partners, because it requires action by Government. One example is the need to change the regulatory framework on compulsory metering. It is welcome progress to see the actions now set out more clearly in the Implementation Plan, but it is also essential for Government to act on these enabling requirements.

2.4 If government action to change the regulatory framework for compulsory metering, as indicated in the final Implementation Plan is not forthcoming, consideration should be given to designating the constituent supply areas as 'water scarce' and hence subject to compulsory installation of domestic meters.

2.5 There should be better monitoring of and learning about the practical use of water efficiency measures, including and understanding of the barriers that need to be addressed through regulatory change, to give a clearer incentive to water companies to consider this a more central part of their business model.

2.6 There should also be much more widespread consideration of indirect reuse of treated effluent as part of supply strategy, through treated water discharges to rivers and abstraction of equivalent quantities downstream. This is long established practice in parts of the region, and new schemes in Essex have proven that the public do accept this approach when it is well implemented through rivers. Currently too much treated waste water is discharged to the sea when it could be re-used via river abstraction. Assuming only 10% of current discharges to the sea would deliver as much as available water efficiency savings and begin to move the South East in the right direction towards the ultimately achievable goal of resource neutrality. [(2)]

(2) Achieving Water Neutrality in the SE: Discussion paper by Sustainability Appraisal Implementation Plan Task Group

**1.E.3 How far is the partnership approach adequate as a mechanism for clarifying and meeting future supply requirements (Policy NRM 2) ?**

3.1 The short answer must be – not very far at all, unless this is followed up with much stronger commitments, and enabling regulatory changes.

3.2 Promotion of resource development schemes rests primarily with the water companies, albeit in consultation with the EA, and each company must operates in accordance with its own business plans and investment programmes, as regulated by OFWAT. This currently leaves very little scope for the formulation of a genuinely unified, region-wide resource management strategy; one that would represent the most environmentally sustainable option and also provide best-value for money for the region's consumers.

3.3 Delivery may require the creation of a body with the authority and resources to formulate such a strategy and direct the companies in its implementation. The fact that no such body exists may explain at least some of the failures and shortcomings in the existing partnership between Government and the regulators, water companies and the wider circle of consultees. This much is evident from the conclusions of the recent water management report (June 2006) released by the House of Lords Select Committee on Science and Technology. The following references give some idea of the measure of the Committee's concerns about the present situation:

> Ref. 4.18. *It is considered "unfortunate" that the [Sustainable Communities Plan (SCP)] growth areas are all located in the SE; the driest region of the country.*
>
> Ref. 4.28. The Committee here states *"It is regrettable that ODPM failed sufficiently to consult the water industry directly or give consideration to the water management implications when formulating the SCP and selecting growth areas".*
>
> Ref. 4.40. Concerning the impact of housing growth on water use: *the Committee were "Completely unconvinced by the figures produced." They considered the methodology to be flawed and noted that the findings had been misinterpreted by the Minister.*
>
> Ref. 5.15. *There was also insufficient evidence to show that the potential consequences of climate change were being adequately factored into long term water management planning and the recommendation is made that OFWAT and EA take steps toward a more "transparent" process.*
>
> Ref. 5.55. *A special recommendation is made that Government, EA and OFWAT support schemes for the indirect re-use of treated wastewater "especially in the driest areas".*

3.4 These examples, we think, serve to demonstrate the lack of meaningful dialogue that took place between the key agencies in the formulation of the Sustainable Communities Plan. While the same situation does not apply to the Plan much of this lack of connection persists, which is a severe institutional problem when the water situation is already difficult and there is an urgent need to address the management of growth demand in the South East.

**1E.4 Have the cumulative effects of growth and the implications of providing additional water and waste treatment capacity been taken fully into account, including on river water quality (Policies NRM 1-2)? If not how should the policies be strengthened?**

4.1. CPRE believes the cumulative effects of growth have not been taken into account. It should also be noted that we still need some clarification of the provisions that some of the companies will need to make for replacing any supply capacity relinquished in compliance with the European Framework Directive and Habitats Directive; deadlined for 2015.

4.2 For the most part the companies are still working to a strategy which has a strong bias toward resource development (including construction of large reservoirs) with only token acknowledgement of the value of demand management. Every Ml/d saved by domestic water efficiency measures represents a corresponding reduction in the quantity of wastewater requiring treatment. The opposite applies to resource development: every Ml/day provided through major new resource development will result in a corresponding increase in the amount of waste water requiring treatment.

4.3 Local Authorities should be encouraged to work with the Environment Agency and other water partners to draw up integrated water management strategies, and the EA should be resourced to enable this work to be done. The River Basin Management Plans through which the Water Framework and Habits Directives are being addressed, need to be factored into this work as do consideration of climate change impacts. It is likely that the reference framework for OFWAT's regulatory control, including investment timescales will need to be extended to incorporate these wider considerations.

4.4 The need for organisational and regulatory evolution to cope with the impact of these changes should be reflected in NRM1; and NRM 2 should give greater weight to indirect reuse of treated effluent as an element of supply.

**30 October 2006**