Waterwise
344-354 Gray's Inn Road
London
WC1X 8BP
21st February 2022

Deadline 28th February. Responses to hcorns@southwestwater.co.uk

Dear Sir/Madam

Consultation - West Country Water Resources Emerging Plan

Many thanks for the opportunity to comment on the emerging plan. We have focussed our response on the demand management elements of the plan. We have also taken into account in our response the Waterwise briefing issued to the five regional groups in December 2020 that set out our thoughts on what we would expect to see in the emerging plans as well as a similar document issued by Blueprint for Water in 2021.

Assessment of Future Needs

- We are pleased to see WCWR engaging with **non-PWS abstractors** to try to better understand their current and future needs and to engage with them on potential solutions. This is a major step forward in water resource planning.

- There is a general need in water resource planning to improve the understanding of future **non-household PWS needs** and the opportunities for NHH demand reduction. That said, we believe that this aspect has been addressed relatively well in the WCWR plan when compared to the other emerging plans and that there has been far more effective engagement with water retailers.

- It is evident that there is a lot of **uncertainty** in most of the predictions of future needs and this is an area that definitely needs ongoing attention as highlighted in the report. In light of these uncertainties the approach of looking at scenarios and of developing **an adaptive plan** makes a lot of sense, providing the uncertainties are kept under review.

- In terms of **the needs of the environment** we are pleased that WCWR has modelled the Enhance environmental destination scenarios. We believe that this first regional plan should be ambitious in terms of what it sets out to achieve for the environment. We want to see Environmental needs embedded in the forecast of future needs before considering making more water available to other sectors. Subsequent trade-offs to reduce environmental ambition (such as shifting to BAU) should not be considered without “trade-offs” or enhanced commitments being made

by other sectors to reduce their future needs (see below). It is disappointing that the plan only meets current environmental needs and not future environmental needs whilst it does include actions to meet the future needs of other sectors.

Proposed Solutions

- We fully support the plan in its ambition to deliver **significant PWS demand reductions** and it is good to be able to see in the plan the assumptions that have gone into the demand reduction plans for households (Table 10) which appear sensible.

- We are also pleased to see the emerging plan include a number of options for **reducing non household PWS demand**. This is an area that is weak in the other regional plans. We look forward to the inclusion of smart metering and leakage in this analysis.

- Water resource management planning guidance requires explicit consideration of a **smart metering** roll out option. There is a growing body of evidence that they can deliver significant benefits both in terms of leakage reduction and engaging with HH and NHH customers on consumption reduction. At the moment because the plan does not consider leakage reduction options these benefits are being missed. We would like to see a commitment that no new “dumb” meters will be installed and a timeline to roll out new smart meters and/or convert existing meters to smart meters for HH and NHH customers across the whole WRSE region. New research by Frontier Economics and Artesia has shown that this is cost beneficial for all the companies in the WCWR region.

- We are pleased to see the WCWR plan clearly setting out where **government policy** is needed to help deliver the deep demand reductions needed. We fully support the calls for a mandatory water label and for more ambitious building standards.

- Further work is needed as the plan develops to include the future needs of **non-PWS abstractors** and we would like to see a section added to the plan highlighting the **commitment and plans** of the two main sectors (minerals and farming) to manage their future demand carefully (i.e. to use water efficiently and to minimise wastage). The WRAP 2030 Water Roadmap for the food and drink sector is a good example that could be referenced in the plana log with the NFU’s integrated water management report and its regional reports.

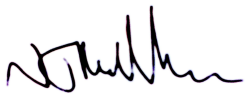
- We support the statement on p65 that water companies should look to **increase investment in demand management** to both deliver the savings that are needed but also to reduce the uncertainty in long term demand reductions and leakage reduction. Close monitoring of progress with demand reduction is important so that adjustments and adaptations can be made to both the programmes and to policy.

Reference could be made of the role of the **Senior Water Demand Reduction Group** linked to the National Framework which was setup to provide oversight on progress with demand reduction.

- We are really pleased to see in Appendix 2 a comparison of the emerging plan content with the Blueprint for Water asks. However, a number of the asks are missing and need to be added.

If you have any questions on our response please do get in touch.

Regards



Dr Nathan Richardson
Head of Policy and Strategy
Nathan.richardson@waterwise.org.uk

Who is Waterwise

Waterwise was founded in 2005 and is the leading authority on water efficiency in the UK. We are an independent, not-for-profit organisation, receiving funding from supporters across and beyond the water sector and wider sponsorship and research projects. We like to be at the front, leading and supporting innovative efforts to realise our mission; that water will be used wisely, every day, everywhere.