

**Written Evidence to the Environment, Food and Rural Affairs Select Committee  
Inquiry into the Water White Paper**

**A response by the Blueprint for Water coalition**

**1. Introduction**

1.1. The Blueprint for Water is a unique coalition of environmental, water efficiency, and fishing and angling organisations to call on the Government and its agencies to set out the necessary steps to achieve “sustainable water” by 2015. The Blueprint for Water is a campaign of Wildlife and Countryside Link. In August 2011, we set out our key tests for the Water White Paper (WWP).<sup>1</sup>

This response is supported by the following 9 organisations:

- Angling Trust
- Buglife – The Invertebrate Conservation Trust
- The Rivers Trust
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- Waterwise
- Wildfowl & Wetlands Trust
- Woodland Trust
- WWF-UK

1.2. The Blueprint for Water welcomes the Government’s WWP and is supportive of the vision it sets out for a sustainable water industry that delivers affordable water and protects our precious rivers and wetland wildlife.

1.3. It is right that a healthy freshwater environment forms the heart of the WWP. We welcome commitment to the Water Framework Directive (WFD), the focus on addressing unsustainable abstraction and the emphasis on addressing diffuse pollution via catchment management and the promotion of Sustainable Drainage Systems (SuDS). Our main concerns relate to the long timescales for delivery and lack of clarity over immediate actions. We feel that the WWP does not include sufficient action to drive water efficiency. This, with the absence of a strategy to encourage metering, is a key barrier to delivering sustainable and affordable water and we fear that the Government may fail in the entirety of its vision because of it.

1.4. The true test of the WWP is still to come. Government has promised a number of forthcoming consultations, plans and strategies that will outline how its vision for the water environment will be achieved. But our wildlife is suffering now – just a quarter of our catchments are in good ecological health – and so on many fronts we need immediate action.

**2. Waste less water**

2.1. We welcome the Government’s “contribution to a campaign to save water” and the emphasis on connections between water use and the quality of our rivers. How this campaign is

---

<sup>1</sup> Available at:

[http://www.wcl.org.uk/docs/Link\\_Blueprint\\_for\\_a\\_sustainable\\_Water\\_White\\_Paper\\_1Sep11\\_FINAL.pdf](http://www.wcl.org.uk/docs/Link_Blueprint_for_a_sustainable_Water_White_Paper_1Sep11_FINAL.pdf)

delivered needs careful thought, and long-term commitment. However, the policy drivers for water efficiency are distinctly lacking. We are concerned that the expectations on reducing demand are too oblique and not supported by policy instruments (such as incentives for demand management<sup>2</sup>) that will deliver real savings. It is therefore essential that Government's guidance to Ofwat includes clarity and emphasis on demand management to reduce water consumption by at least 20%. We welcome the link made between water efficiency and the Green Deal but we are concerned that lack of join up with the Department of Energy and Climate Change may be a barrier to delivery.

### **3. Keep our rivers flowing and wetlands wet**

- 3.1. We fully support the case for change and welcome an abstraction regime that better values water, reflects scarcity and protects the environment. The principals outlined in the WWP offer the cornerstones of an effective regime. We are concerned that legislation is delayed until the next Parliament and that a fully reformed, sustainable regime could be two decades away.
- 3.2. We agree with the Government that immediate action is needed to speed up and amend licences that currently damage the environment. The WWP provides some welcome proposals (including water company Restoring Sustainable Abstraction schemes in the price review 2014), the Abstraction Incentive Mechanism to encourage companies to consider environmental impacts and intention to use powers in the Water Act 2003 to revoke or vary abstraction licences that are causing serious damage). Clarity is urgently needed to allow implementation.

### **4. Price water fairly**

- 4.1. We are concerned the proposals on charging may fail to protect the environment and consumers adequately. It is a major disappointment that the proposals on water charging set out by Government fail to encourage a significant increase in the installation of water meters, despite clear evidence of the benefits to customers and the water environment. This, plus the focus on flexibility in social tariffs, means that affordability may not reflect geography as much as need.
- 4.2. Government's guidance to Ofwat must emphasise the role meters play in reducing demand, addressing affordability and keeping bills down over the medium to long-term. It should reinforce the Walker Review findings and set expectation of getting from 50% to 80% metering in the next price review.

### **5. Slow, manage and clean drainage from roads and buildings**

- 5.1. We welcome the invigorated focus on tackling different sources of diffuse pollution, the references to the multiple benefits of SuDS and the commitment to consult on a national strategy on urban diffuse pollution in 2012. The WWP falls short of providing a full framework to enable the uptake of SuDS including their retrofitting to existing areas where surface water or pollution is a problem. We are also concerned about ongoing policy inertia holding up the delivery of SuDS, including proposals contained within the current SuDS consultation to allow for exemptions and delays in new developments.

### **6. Protect and restore catchments from source to sea**

- 6.1. We are pleased to see the emphasis on the WFD, the catchment approach and welcome Government's support of water industry investment in catchment management and the commitment to use CAP reform and agri-environment more effectively.

---

<sup>2</sup> Ofwat's Future Price Limits consultation includes incentives to encourage water trading to address the bias against operational expenditure.

- 6.2. The WWP makes important moves towards integrating and aligning existing processes and initiatives relating to water. This is essential in achieving the Government's ambition to halt biodiversity loss, support healthy functioning ecosystems and establish coherent ecological networks. But it falls short of the integrated framework necessary (e.g. joined up Nature Improvement Areas, catchments for WFD delivery and approaches to Flood Risk Management).
- 6.3. While we welcome the commitment to consider new mandatory measures should voluntary approaches fail, but there is no guidance on when it might be appropriate to consider them. It is also not clear how and when existing baseline regulation will be incorporated into the catchment approach. Defra and the Environment Agency need to commit to tackling diffuse pollution through advice and incentives underpinned by effective implementation of existing regulation, with a clear timetable for introducing further regulation if existing measures do not meet defined objectives.

**Blueprint for Water**  
**January 2012**



Wildlife and Countryside Link  
89 Albert Embankment, London, SE1 7TP  
W: [www.wcl.org.uk](http://www.wcl.org.uk)

Wildlife and Countryside Link is a registered  
charity (No. 1107460) and a company limited  
by guarantee in England and Wales (No.3889519)