

## Water Efficiency Strategy Consultation Blueprint for Water response – September 2021

*Wildlife and Countryside Link is a coalition of 61 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.*

*Blueprint for Water, part of Wildlife and Countryside Link, is a unique coalition of environmental, water efficiency, fisheries and recreational organisations that come together to form a powerful joint voice across a range of water-based issues.*

This response is supported by the following Link members:

- Amphibian and Reptile Conservation
- Angling Trust
- British Canoeing
- Institute of Fisheries Management
- National Trust
- The Rivers Trust
- The Wildlife Trusts

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### Section 1: Your organisation

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3. Name of your organisation  
Blueprint for Water, part of Wildlife and Countryside Link.
4. Are you answering this consultation on behalf of your organisation or as an individual?
  - a. On behalf of the organisation**
  - b. As an individual
  - c. Other
5. Type of organisation
  - a. water company
  - b. water retailer

- c. Regulator/government
- d. NGO**
- e. consumer rep
- f. Business
- g. trade body
- h. Other

## Section 2: General questions

1. Do you think that water scarcity is a serious threat to the UK?
  - a. **Yes.** Much of England is now officially categorised as being water stressed, and this will only increase due to a number of factors: including climate change; increasing personal, business and agricultural demand; and increased development, particularly in the South-East and East of England. Water scarcity will directly impact on public health and economic growth as well as the environment.
  
2. Do you think that there needs to be greater consideration given to the impacts of water scarcity?
  - a. **Yes**
  
  - 2b. If yes, then by whom?

Government, its regulators and agencies need to be giving greater policy and political priority to water scarcity in the future, as failing to do so will only make the issues set out in Q1 worse. This must go across government – for example, the Treasury must view water scarcity through the lens of future economic prosperity, MHCLG must factor it into planning and development policies, BEIS must make it central to any future industrial strategy, and DEFRA must make it a key part of its agriculture, environment and biodiversity strategies. Ofwat must set clear ambitions through PR24 for water companies to deliver against during AMP8. This should all work alongside water companies' and high-water-using sectors' own strategies, which must demonstrate innovation and proactive changes. All of these organisations must also play a role in raising awareness of these issues across society.

3. Do you think that increased water efficiency is a legitimate response to the threat of water scarcity?
  - a. **Yes.** It is essential, whether through more efficient use in business and agriculture, through less wastage in the supply and distribution of water, or more efficient use in the home. Tackling all aspects is vital.
  
4. Do you think we are doing enough at the moment to mitigate the threat of water scarcity?
  - a. Yes
  - b. **No.** Recent droughts and water shortages, low flows in rivers, the drying up of chalk streams, and increased water consumption during the pandemic all point to a lack of effective action. With changing rainfall patterns (frequency, intensity, distribution) in future, this is going to get worse.

### Section 3: Boundaries of the new Strategy 2.0

1. The current vision of the Strategy is for “A UK in which all people, homes and businesses are water efficient”. Do you think we should retain the vision for the new Strategy?
  - a. **Yes.** This is a good vision. But the next strategy will need to recognise the long-term aspirational nature of this vision and develop a clear set of milestones which drive the issue towards this vision within the timeframe of the strategy.
  
2. We propose the new Strategy continues to be UK wide. Do you agree?
  - a. **Yes.** The strategy should continue to be UK wide, and must use that opportunity to ensure best practice is shared across the four nations.
  
3. Broadly which elements of water demand should the new strategy address?
  - a. **Household water use.**  
This accounts for half of all use, so is a high priority.
  - b. **Business / non-household water use.**  
This forms a quarter of use, and COVID-19 saw a switch between categories, so we must consider all categories in tandem.
  - c. **Leakage.**  
This is a quarter of use. All three contribute to environmental impact and are a legitimate component of the forthcoming Environment Bill target for England, so none should be overlooked.
  - d. **Public water abstractors.**  
As well as the water industry, the strategy should consider direct abstractors such as agriculture. In England, these abstractors are responsible for around 1/15<sup>th</sup> of all consumptive abstraction, and so need to play a part by ensuring their use of water is efficient.
  
4. What timescale should the Strategy cover?
  - a. 10 Years (2022-2032)
  - b. 5 Years (2022-2027)
  - c. **3 Years (2022-2025)**  
A three-year strategy would allow frequent updating in a field which has the scope to change rapidly, and would mean that the new strategy would be reviewed and updated as we come to the end of the current water industry AMP period in 2025. However, in order to avoid a solely short-term focus, the strategy should be set in the in context of a long-term vision and milestones. It may be appropriate for future strategies to cover a five-year period to tie into the Water Resources Management Planning and Business Planning cycles.

## Section 4: Key Themes

1. Which themes or issues do you think the new Strategy2.0 should include?
  - a. **New developments.**

An important focus could be on changing building regulations, particularly given the need for more housing. Government must provide a clear steer for house builders and developers, if we are to see any real improvements in water efficient housing or use of rainwater harvesting and 'grey water' recycling.
  - b. **Improving products.**
  - c. **Raising awareness.**

Water efficiency is not currently taken as seriously by society as it needs to be, due to the relatively low cost of water compared to other utilities, and the relative infrequency of serious droughts to date. However, the scenarios illustrated in the Water Resources National Framework for England make it clear that risk is increasing and impacts could be significant for society as well as the environment. Raising awareness of the potential impacts of a lack of water efficiency is therefore important, and should sit alongside raising awareness of potential solutions.
  - d. **Business water efficiency**
  - e. **Energy & net zero**

The water sector is a large emitter, particularly when considering the emissions caused by customers' water use.
  - f. **Affordability**
  - g. **Policy & regulation**
  - h. **Natural environment.**

A healthy water environment underpins the activities of the water sector, so is particularly important to companies. Impacts must be considered be in light of the biodiversity crisis. Locally-delivered awareness campaigns could tie to this, being used to build the evidence base; both demonstrating the benefit to the environment of water efficiency activities, and the efficacy of basing awareness campaigns around environmental impact.
2. Which other themes should be included in the Strategy 2.0?
  - Education. For example; more specific than awareness-raising amongst customers; water efficiency should be built in to the national curriculum; influencing the customers of the future.
  - Research and evidence needs could also be a theme, such as for 1.h (above).
3. If you could see 3-5 actions implemented to help increase/improve water efficiency what would they be?
  - **Universal metering**

We know that customers that pay for their water by meter are more water efficient, using 12-22% less than those that pay by rateable value, and that metering aids leak detection, thereby helping to reduce losses through leakage. Universal metering offers an effective way of delivering these efficiencies across the country, making a widespread contribution to national and regional resilience.

- **Changes to Building regulations**

In 2018, the Environmental Audit Committee recommended a single ambitious national minimum standard that tightens over time. This would be simplest for local authorities and developers to implement, recognises that droughts can happen anywhere (not just in areas classed as water stressed), and that we need a national approach to resilience. It allows for the benefits of greater water efficiency to be realised nationally including reduced energy use and carbon emissions, improving affordability and leaving more water in the environment. We want to see a single national minimum standard of 100 l pppd adopted nationally immediately, with a commitment to reduce it to at least 95 l pppd by 2030.
  - **Continued leakage reduction.**

Leakage reduction by companies is important for customer confidence and in garnering customer action on water efficiency. A strong steer from regulators was instrumental in generating the level of ambition of leakage reduction in current water company plans, and a similar steer is likely to be helpful in encouraging future high ambition.
  - **Product labelling to be ambitiously & broadly applied**

Currently, it is difficult for customers to make informed choices about the water efficiency of water-using products they buy. Introducing a mandatory water labelling scheme linked to fittings standards will address this and is the single most important thing that government could do to help reduce personal water use. A mandatory water labelling scheme linked to minimum standards has been in place in Australia since 2005, with a 2017 report by Waterwise finding that a similar scheme implemented in England could save over 1,500 MI/d of water by 2045, reducing personal consumption by over 30 l pppd. Over 25 years it would reduce household utility bills by £34 billion and cut emissions by over 50 MtCO<sub>2</sub>e.
  - In addition, when time-limited **abstraction licences** are renewed, water efficiency actions / commitments should be factored in as part of that process, ensuring that licences do not permit wastefulness with water. This is in keeping with the principles of the RSA process.
4. How should we monitor progress against the themes within the Strategy 2.0?  
Actions should be SMART, with milestones to be set for the three-year strategy that contribute towards long-term objectives. There should also be wider sharing of the progress made towards targets.

## Section 5: Case studies and Next Steps

1. Do you have any relevant case studies or evidence that could inform the new Strategy or be highlighted in it as a case study? Please describe.  
Blueprint members have provided the case studies included in Appendix 1.
2. How do you want to be involved in shaping and delivering the Strategy 2.0?
  - a. **Involved with a new task and finish group** – via Waterwise.
  - b. No more than the consultation responses
  - c. Involved in progressing specific themes or actions

- d. As part of a wider engaged stakeholder group (including) via Waterwise newsletter
  - e. Other
3. Do you have any other comments?

## Appendix 1

### Water Efficiency Case Studies – National Trust

At organisation level:

- We have a new environmental policy that asks for meters to be installed at all locations ensuring we can measure consumption fully, which will help us to target leakage and effectively introduce water efficiency to our high users.
- Through working alongside our retailer we are embarking on a project to install AMR devices on 600 of our fiscal water meters, helping to ensure regular and accurate data.

The impact of these 'organisation wide' policies will be published when good consistent data becomes available in the coming months.

Property specific examples focus on water use in gardens.

#### Nymans

Nymans was bought in the 19<sup>th</sup> Century by the Messel Family. Inspired by the setting and the soil, they created one of the country's great gardens, with experimental designs and new plants from around the world. Nymans is a lead property for environmental innovation from its inception and this is carried through to today.

Nymans is situated in the South East of England and has experienced significant drought issues because of climate change, but also because of the nature of the free draining sandy loam soils.

Climate science predicts that both the average winter temperature (3.5°C by 2080) and summer temperature (4.9°C by 2080) will rise. Winter rainfall is projected to increase (30% by 2080) and summer rainfall decrease (30% by 2080).

Gardens demand more water with increasing temperature. Winter rainfall is projected to increase and summer rainfall to decrease so when plants need the most water the property experiences less rainfall.

What has been done?

- One key strategy is to store rainwater. 15 years ago the property doubled capacity from 40,000 to 80,000 litres. Due to the increasing demand this was increased again to 150,000 litres. In 2018 the system ran dry for the first time and there are plans are now in place to further increase capacity, so if it stops raining in April, the garden will have enough water to last through the summer until September, when hopefully it will start to rain again.
- The other strategy is to reduce consumption in the garden through many innovative techniques, including a well-developed plant watering strategy. The summer borders are watered when planted and in the first week but then left until a visual check shows the plants need more. Where appropriate, plants can be used that do not consume large volumes of water like Salvia 'Hot Lips' which originates from Mexico. The property has also developed the Australasian Garden with the ethos 'right plant, right place'. The plants used will require no irrigation once established even though they see full sun for most of the day.

## Ham House

Please take a look our new video about Ham House [here](#). It describes the changes being made to adapt to climate change. Key water related highlights are:

- 1) Use of a Victorian Irrigation System which means we are never or at least less reliant on mains supply for irrigation purposes.
- 2) Property based composting (incl. coffee cups from the café) to keep soil moist.
- 3) Changes in planting types and locations to ensure less water is used for irrigation and more is kept in the landscape for nature.