



The Cam Valley Forum is an
unincorporated association, registered
with HMRC as a charity.
info@camvalleyforum.uk
<https://camvalleyforum.uk>

Chairman: Stephen Tomkins
Secretary: Alan Woods
Treasurer: Bruce Huett

15 October 2021

RESPONSE TO THE DEFRA CONSULTATION PAPER:

THE GOVERNMENT'S STRATEGIC PRIORITIES FOR OFWAT

The Cam Valley Forum welcomes the opportunity to comment on [The government's strategic priorities for OFWAT](#).

The Cam Valley Forum is an association of local individuals with diverse environmental, recreational, academic and business interests, concerned directly or indirectly with the River Cam. Our mission is to defend the health and wellbeing of the Cam for its wildlife and environment and for people; safeguard its historical and cultural importance; and seek, through a reasoned and evidence-based approach, changes in policy and practice to enhance the water environment of the entire catchment.

The following paragraphs explain why and how we consider that the Government's expectations of OFWAT (and the water companies) should be strengthened.

1. Our primary concern is the protection, restoration and enhancement of Chalk streams. In the Cam Valley these depend for their health on an aquifer that has long been adversely impacted by the abstractions of three water companies: Cambridge (South Staffordshire) Water, Affinity Water and Anglian Water, taking respectively 64%, 22% and 14% of the total of some 105 MI/day (2019). Dramatic impoverishment of wetland biodiversity as a result of low or non-existent flows has been exacerbated by pollution from wastewater and diffuse pollution, and misguided river engineering.
2. We accordingly welcome the emphasis placed on 'protecting and enhancing the environment' and the specific statement in paragraph 20 '*We expect companies to support environmental protection and enhancement of priority habitats such as chalk streams.*' However, given the UK's global responsibility for safeguarding Chalk streams (we have 85% of the world resource), and the launch on (15 October 2021) of the Catchment-based Approach (CaBA) Chalk Stream Restoration Strategy, we consider that Chalk streams merit more than one sentence.
3. We recommend that that sentence should be replaced with a new paragraph 20A along the following lines:

'We expect OFWAT and the water companies to act to protect and enhance priority habitats. In the case of Chalk streams, for which the UK has a global responsibility, we expect them to take a lead role in implementing the CaBA Chalk Stream Restoration Strategy 2021. They should take all possible steps to reduce abstraction from Chalk aquifers at source, aiming to ensure that chalk springs and headwaters run freely, as they would under natural conditions, every year, whatever the weather. The companies should cap abstraction at current actual (not licensed) levels, meet new demand through water transfers (from surface water sources) from other companies, and invest in reservoirs fed by high winter flows as alternative sources of supply. Recognising that all Chalk streams now lie within 'areas of serious water stress', they should establish a new baseline of annual restrictions on water use and tighten these as necessary in response to environmental as well as supply triggers. Companies treating wastewater should invest in spill monitoring, stormwater storage, and phosphate reduction to 0.2 mg/l total phosphorus, at all works that discharge to Chalk streams.'

4. This new paragraph should be reinforced by new or amended bullet points under the various headings 'We expect OFWAT to...' as follows:

Paragraph 22 (Environmental ambition):

- *Ensure that water companies prioritise the protection, restoration and enhancement of Chalk streams by significantly reducing the impacts on them of abstraction and wastewater discharges.*

Paragraph 24 (Getting the basics right):

- *Incentivise water companies to significantly reduce the frequency and volume of sewage discharges from storm overflows, prioritising discharges to Chalk streams and rivers used for water-based recreation for action, even if these watercourses are not formally designated as 'bathing waters'.*

Paragraph 29 (Meeting long-term water resource needs):

- *Encourage and incentivise action to address unsustainable abstraction that harms the environment, including ensuring that chalk springs and headwaters run freely, as they would under natural conditions, every year, whatever the weather.*

5. In the recognised 'areas of serious water stress', which now cover nearly all of England south of the Humber, people should no longer expect to have unlimited access to public water supplies for any purpose at any time. The message that water is a scarce resource needs to be conveyed to people through a new approach to metering, leakage control, personal water consumption and service standards that safeguards not only potable water supplies but also the natural environment.

6. New bullet points should accordingly be added to paragraph 30 (Managing water demand):

- *Require companies that abstract from Chalk aquifers to introduce compulsory metering, and to drive down leakage from their own and customers' pipes, and to play their part in reducing personal water consumption to much lower levels than is currently proposed.*
- *Reconfigure water company service standards to enable Temporary Use Bans and Non-Essential Use Bans to become part of a graduated suite of sophisticated demand management measures that is used to curtail water use in areas of serious water stress whenever the Environment Agency determines that dry weather, of whatever intensity, is having an adverse impact on the environment. This should include appropriate regular summer restrictions.*

7. In our report [Let it Flow!](#) of May 2020, and our subsequent representations to Ministers, OFWAT, the Environment Agency and water companies, we have encouraged all parties to draw on, and learn from, the experience of other countries in managing water resources. South Africa, for example, not only has sophisticated systems for managing demand, but also uses progressive tariffs. Their tariff system safeguards basic needs, guaranteeing affordability for the poor while ensuring that those that consume more pay much higher charges. The tariff rates can be increased as supplies come under increasing stress. Similar approaches would surely be valuable in the UK.

8. Defra should accordingly encourage OFWAT to evaluate different tariff options with a view to their introduction from 2025. A further bullet point should be added under paragraph 46 (Going further to protect customers):

- *Investigate alternative tariff structures, drawing on experience from other countries, with a view to developing proposals for new tariffs from 2025 that will guarantee affordability for the poor while ensuring that those that consume more pay much higher charges.'*

15 October 2021