Cam Valley Forum Response to the Cunliffe review.

Answers to Questions from the Call for Evidence. (pp 229- 269 of the Cunliffe Review)

Section 1: About You

1. Would you like your response to be confidential?
No

2. NA

3. Do you consent to being contacted by the Independent Water Commission about your response?
Yes

4. If you consented above, please provide your full name.
Stephen Portal Tomkins

5. If you consented above, please provide your email address.
spt22@cam.ac.uk (personal) and (info@cvf.com)

6. In what capacity are you completing this Call for Evidence?
As an NGO or other non-profit public interest group.

7. What is the name of the organisation or interested group that you are responding on behalf of?

The Cam Valley Forum is a voluntary group, established in 2001. We work with our extensive network of partners to protect and improve the environment of the River Cam and its tributaries.

- We help identify, monitor and tackle problems affecting the river
- We build new collaborations and initiatives to improve the river and its surroundings.
- We campaign for improvements and advise on projects that may affect the river.
- We promote understanding of the river environment, including through workshops, guided walks and training of volunteers.

We are registered as a charity with HMRC (reference number XT3878

: https://camvalleyforum.uk/

8. Where do you live?
England

9,Where does your business or organisation operate?
England, in the Cam Catchment

Section 2: Questions on Chapter 2 – Overarching Framework for the Management of Water

10a. **Water System Outcomes Top Priorities**: Thinking ahead to what you would like the water system to look like in the future (e.g., in 25 years time), what outcomes from the water system are most important to you? (Please select your first priority here)

Other (please specify)

If you selected other, please specify below:

We heartily welcome the Cunliffe review as this indicates that our Government now recognises that there has been a historical failure to see early on where we have really got it most wrong with the whole water sector. Our highest priority outcome should of course be inclusive of all of these ten targets, but in terms of helping Government to prioritise, through the action that it might take nationally, we will need to manage water better than we have in the recent past.

Many of our comments need to be seen in the light of our Cambridge Area location in East Anglia, with a low mean rainfall and greater rainfall variance than other areas. We also have a greatly over abstracted Chalk aquifer. Much of our response to the Review is thus of an environmental nature and that should influence the outcomes we would like to see achieved.

As we see it, **Water is a Commons** – a shared resource – between nature (first and foremost), farming, environment, as well as our recreation and welfare needs and that includes its drinking water supply. It therefore needs a management system where the constituent parties who are served by it do have an equal voice. To us this requires building an integrated water resource management framework, from the bottom up, which is your clear overarching aim. Such thinking[1] means that a very radical change is needed – albeit stepwise in that new direction. It's going to have to be a much 'greener direction' with a wider framework of stakeholder participation. The sector has lost trust and that needs to be regained.

10b. **Water System Outcomes: Second Priority**

Thinking ahead to what you would like the water system to look like in the future (e.g., in 25 years time), what outcomes from the water system are most important to you?
(Please select your second priority here)

Improved water environment (e.g. healthy habitats for aquatic plants and animals).

Our water environment has lost biodiversity (including local species extinctions). The Cambridge Milk Parsley (*Selinum carvifolia*) a wetland species characteristic of our County wetlands is near extinction now.

11a To what extent do you believe the overall water framework already delivers your chosen outcome: an improved water environment (e.g. healthy habitats for aquatic plants and animals)?

To some extent

[1] Elinor Ostrom (a Nobel Laureate in Economics) and her many co-researchers developed a comprehensive socio-Ecological System (SES) framework, within which much of the still-evolving theory of common-pool resources and collective self-governance is now located.

Water System Outcomes: Third Priority

10c Thinking ahead to what you would like the water system to look like in the future (e.g., in 25 years time), what outcomes from the water system are most important to you? (Please select your third priority here)

Water bodies being safe for swimming and other recreational uses (e.g. kayaking, paddleboarding)

11b To what extent do you believe the overall water framework already delivers your chosen outcome: safer water.

To some extent

Management of Water

12. Who do you believe should be responsible for making decisions about what outcomes to prioritise from the water system?
This is not intended to be an exhaustive list. Apart from the above, please think about other bodies you consider to be relevant.

Central to the management of water, as a 'Commons' or a 'Common-pool resource', is the Catchment Based Approach (CaBA) principle. Defra very wisely set this up in 2013, but it has not been integrated into any local authority thinking at all! Firstly, CaBA is spot on with its localisation of right thinking about water ecosystems. It is totally appropriate. Our CaBA group, in the Cam and Ely Ouse catchment group, has been little more than an ill-attended talking shop until this last year. Nothing that was said in our meetings had any delivery impact at all.

In reality it was volunteer groups like ours, in the drought of 2019, that alerted our local government to the fact that we were trapped in a totally unsustainable water supply system. When the Granta Chalk stream stopped flowing that summer the Water Company denied that they were doing anything wrong by abstracting 10 megalitres per day as it was all licenced. Even the EA initially dismissed our concerns. After some months it was the EA drought manager that first admitted to local government that the water companies were not sustainable licenced. Rather shame facedly, again, it was the EA that revealed first to our CaBA group that the water quality of the Cam was 'poor', we now know that this was largely a joint Water Company failure that was to blame (Cambridge Water had abstracted from the aquifer to the extent that stream flows were non-existent and Anglian Water had too many small over loaded sewage works whose outfall contributed to the remaining River flows). It was the local politicians who then declared the Cam catchment to be in a "Water Scarcity Crisis".

You therefore need powers for local authorities to be able to understand these things better and intelligently to also direct water planning. It is ecologically impossible for a Water Company here to supply water that the ecosystem physically cannot provide. Here in Cambridge, we also have catchments and County boundaries that do not coincide. Affinity Water takes water from our Cam catchment south to Hertfordshire. Developments in Essex emit poorly treated sewage effluent into Cambridgeshire's rivers. Wider integration above such catchment level needs to be integrated better by either an overarching Mayoral system or perhaps a 'Water Czar' who has some real power. Either way the status quo is not going to work.

The regional water resource planning here (for us Water Resources East) is a good start but CaBA groups have absolutely no meaningful input to their operation. There is also a totally insufficient voice for both farming and wildlife alongside the needs of water for the tap. This is because water is not seen as a Commons for the natural world to call on equally. Nature is disenfranchised by not having an advocate with sufficient teeth. Left to themselves water companies have proven themselves to be just predatory on Natural Capital. We have observed WRE to have changed their tune through what can only be called local and vocal activism.

We do need the regulators (EA, Natural England, OFWAT and DWI etc, but they need to be more powerful and somehow better integrated with water resource management.

13. Do you believe there should be changes to roles and responsibilities for water management across local, regional and national levels?

Changes are (definitely) needed

If you selected changes are needed, please explain below. Consider how you believe roles and responsibilities should be better organised across local,
regional, and national levels, including who you believe should be the lead authority at each level and why. :

See our comments given above in 12

14. Do you believe changes are needed to help reduce the siloed approach to water management across different sectors? If so, what changes
do you believe would be beneficial? (Please select up to 5 options)

- Government providing clearer national strategic direction and targets on water,
- A regional or catchment scale systems planning authority,
- Aligning water management with democratic structures,
- Pooling together existing funding streams at a spatial level,
- Changes to how regulators regulate sectors involved in the water system (e.g. through monitoring, advice, enforcement, etc.)

15. Do you believe there are barriers to money being spent more effectively and efficiently across different sectors to deliver the best outcomes for the water system? If so, what do you believe are the key barriers? (Please select up to 3 options)

- Limitations of evidence on costs and benefits (including co-benefits, such as wider environmental or ecological outcomes),
- Limitations of alignment of existing funding pots (e.g. water company investment, agri-environment schemes, government funding for Catchment Partnerships),
- Barriers to partnership schemes (e.g. joint maintenance agreements, collaboration across sectors)

16. In your opinion, is it more important that regional water system governance aligns with hydrological or local government boundaries?

Hydrological boundaries (e.g. water catchments, river basin districts) makes the best sense, but clearly both are needed.

Management of the Water Environment

17. Do you believe changes are needed to the WFD Regulations, including for 2027 onwards? If so, which areas would benefit the most from change? (Please select all that apply)

- The targets and objectives (e.g. 'Good Ecological Status' water body objectives, the designation of Artificial and Heavily Modified Water Bodies, the deadlines for achieving environmental objectives, the scale at which objectives are set and applied),
- Governance and accountability (e.g. the duties of governments and organisations),
- Public participation and engagement (e.g. through consultations, delivery and investment planning)

18. If you feel the WFD Regulations would benefit from change, please expand on where you feel changes are necessary and the reasons why.
Please expand below:

WFD Regulations were not in the least wrong-headed. They were ambitious and needed an EA that had the funding and power to impliment them. Had there been more say from the catchment-based groupings this present state of affairs would not have happened. As it was WFD became the victim and was pilloried as ineffective. Secondly the water companies, particularly Anglian Water in Cambridgeshire, were able to wriggle out of being culpable by having access to powerful lawyers in court cases where anglers were up against them. It took six years (2013-2019) to win a court case when the EA finally backed the fisherman. They then won compensation. (ref: https://www.bbc.co.uk/news/uk-england-cambridgeshire-47247346).

Measuring and Assessing the Water Environment

19. Do you believe changes are needed to improve how we monitor and report on the health of the water environment? If so, what changes do you believe could lead to improvements? (Please select all that apply)

The EA are at last putting data out faster and on-line. This is welcome. Citizen scientists are also being increasingly able to achieve notifications that the EA take note of. They are also supportive of our work. We need to get the EA and local catchment groups better linked.

One recent example from the River Granta should be noted. Before the Linton STW was upgraded to strip phosphate better we were informed by the EA that one third (35%) of the phosphate in the River Granta was from 'an industrial source' not from an STW. As the river is often polluted with phosphate Cam Valley Forum put pressure on Anglian water to reduce STW outfall levels on this important Chalk stream. This they are now doing. This will up, proportionately, the industrial percentage contribution which is unchanged. However, when we asked the EA to name the industrial source of the ongoing pollution the EA said that they could not reveal the name of the business as 'it was confidential'. That is not good enough.

Strategic Direction for the Water Industry

20. What role do you believe the government can play in providing strategic direction for the water industry?
By 'strategic direction' we mean, for example: the Strategic Policy Statement / the Strategic Priorities and Objectives Statement; Government targets (e.g.
in the Environment Act 2021 and the Plan for Water in England only); the Price Review Forum (Wales only). This is not an exhaustive list.

The Central Government is essential for providing the strategic direction nationally. The water industry is certainly not the body that should be deciding the strategic direction.

The first focus needs to be on the wisest way of managing the shared resource:- the rain and what happens to it, the aquifers and water courses, their water quality and their flow.

- **Rainfall and evapotranspiration** (both are highly variable here in East Anglia)
- **Aquifers** (soil carbon, rain infiltration to soil and aquifer, runoff, erosion of soils)
- **Water courses** (dredging, straightening, re-wiggling for conservation, navigation) ,
- **Water quality** (waste water, sewage treatment, pollution),
- **Water flow** (abstraction from aquifers, over abstraction, augmentation, abstraction for irrigation, reservoir filling)

All these need understanding. e.g. We are not short of rainfall for water supplies. We are just taking it from almost the wrong place at present. It is greatly complicated by the interrelations between all these factors. They are essentially ecological**. So 'Greener' Government thinking is the first essential.**

21. What changes, if any, should be made to how the government provides strategic direction for the water industry?

Changes are needed
If you selected that changes are needed, please describe what changes you feel are needed and why.:

There is an over dominance of the water industry (per se) in the management of the water commons. We need to raise the status of catchment groupings who do see the problems locally. Perhaps each catchment needs its own 'water czar' with their ear listening to these voices.
The Cunliffe review is hugely welcome as ordinary voting citizens are really undereducated in seeing the key issues that their government might influence. But if you start, bottom up, from those engaged in the catchments then you will hear about these problems.

22. Do you believe there are barriers to effective long-term water industry planning? If so, what factors do you believe are preventing effective
long-term water industry planning? (Please select all that apply)

Other
If you selected other, please specify below:

The biggest barrier is that Government is not itself thinking in terms of shared resource management. E.g. In South Cambridgeshire we abstract water from the wrong place, it is far

too cheaply priced and insufficiently valued. We do not think about these essentially interrelated ecological issues nearly enough. Governments that think (as they assume currently here) that water companies **with a monopoly of supply** and **an obligation to supply** can supply **any amount of water**…. Well, they just physically cannot without harming the environment and then being fined. With changed thinking then we can begin to influence the priorities and decide the trade-offs better. More contact and engagement is needed with water customers, river users, river groups, wildlife enthusiasts and farmers.

23. What changes, if any, would help water companies to use planning frameworks more effectively to fulfil their duties and deliver their functions?
Please answer and explain below:

Cam Valley Forum has long been deeply critical of the Cambridge Water Company in particular. This is now part of the bigger South Staffordshire Water Company! South Staffs have an entirely different catchment, rainfall, geology and population. So when their 'consumer panel' meets they do not have the low rainfall, Chalk aquifer scenario that we have. Before privatisation we were locally run. We would like our Water Company back!

Recent management changes in the Company have altered their message for the better but there has been an insufficient acknowledgement of the past unsustainability of their business model. Pre-privatisation, some 60 years ago, its own Cambridge Water Company Chairman, Professor Colin Forbes, recognised the finite and unsustainable nature of continuing to rely solely on a Chalk aquifer source! (British Association for the Advancement of Science, *The Cambridge Region* 1965). Since then that Company has been over-licenced for abstraction, and has inexorably, continued depleting the aquifer with severe environmental impact. The unsustainability of this operation was gradually recognised in the 1970s and 80s, when the Lodes and Granta and Rhee augmentation systems were first initiated to keep streams running. These ground water pumpings (20% of all Cambridge Chalk abstractions) have certainly helped to keep (at great cost) some Chalk streams alive in summer but have also occasionally failed totally in that role. This gross local failure to regulate properly is set against our Chalk streams in the UK being internationally important in the conservation of biodiversity. The UK has about three-quarters of the world's total of Chalk streams. This includes our Cam, Rhee and Granta and many of their tributaries. For reasons of other long-standing environmental abuse, in the Cam Valley, these streams are now no longer among the best but, despite this they are still valued highly for their biodiversity and lowland scenery and for their provision of recreation and well-being for local people. Over-abstraction, channel modification and pollution leading to the present "poor" water quality rating of the Cam are all indicative of our shameful societal disregard for nature.

Cambridge Water needs to cut its abstractions far more (ask the EA for their opinion), we need more reservoirs, more use of collected rainfall in water butts and reservoirs of all sorts, more use of grey water, etc. The Company needs the have smart metering of water, the need to cut leakages and water pricing needs to go up.

Section 3: Questions on Chapter 3 – The Regulators

24. How would you rate the performance of the water regulatory framework?
Performing poorly

25. To what extent do water regulators coordinate effectively in the regulation of the water industry?
To some extent

26. What changes, if any, do you consider are needed to the framework of water regulators to improve the regulation of the water industry?
Please consider both potential benefits and costs of any proposed changes.
Please answer and explain below, providing supporting examples or evidence, where possible:

The EA. The Environment Agency were responsive in 2019 to our call for reduction in Chalk aquifer abstraction by Cambridge Water. This is when Cambridge City first declared a ground water emergency. (Cambridge now has a 'Water Scarcity' group) The EA drought team (2019) acknowledged then that Cambridge Water had been over-licenced to abstract and they have now agreed (2022) that for normal Chalk stream flows to be re-established abstraction would need to be reduced by at least a half of the present rate. Abstraction Reduction is now underway in Cambridge Water's WRMP (24). This degree is very unlikely to be achieved before 2050 as it will need considerable infrastructural change to find alternative sources of water.
The powers of the EA to do the right thing for the environment has been quite rightly questioned here. In our view of it, the reason why regulation has been so poor in the past is due very largely to underfunding of the regulator **as an effective regulator**. There has also been disregard nationally for nature and better natural resource management by successive governments. If we were following a Catchment Based Approach (CaBA) for water planning and management we would not be in this mess now. East Anglia could learn from locations like California and Cape Town where their local authority has powers over water regulation that our local authorities do not.

OfWAT were only given their Environmental aegis in very recent years. They seemed in 2019 quite at sea in terms of action! Where water is 'scarce', as it is notionally here, water is still grossly undervalued. Water is a vital element in life but pure clean water is still some 2000 times cheaper than petrol! This needs to change by upping its price but the knock-on is that clean water will become less affordable by the poor. OfWAT now has the funding to put into WINEP. This has meant that they are funding our Water Company to spend money on improving the Chalk Stream environment. This is welcome but there is an irony involved. The Water Company is welcome to support our Chalk Streams but the reason that those are in such bad shape is largely due to that company continually abstracting too much water from that environment. **This is a nonsense** . (see our answer to your Q 23.

DWI. The Drinking Water Inspectorate is not a body we have dealt with directly. However, Cambridge University put together a new development at Eddington in North West Cambridge that has a rainwater harvesting system for 3000 homes, the largest in the country. It is often cited as an exemplar for water saving, with every home having two supplies: one from rainwater (non-potable) for use in the garden, in the washing machine and flushing the toilet alongside the treated supply from the normal mains. The problem is that the rainwater harvesting supply has not yet been commissioned due to concerns from the Drinking Water Inspectorate (DWI). It seems a bit of a nonsense that the pathway to installing such a sensible system is barred by seeming bureaucracy, even after three years. **Please follow this up.**

27. To what extent do you think the water industry regulators have the capacity, capabilities and skills required to effectively perform their roles?
Please provide information to support your views on the capacity and capability of regulators, including, where possible, supporting evidence and examples :

We know little about the details of the EA, OfWAT and DWI but they should be designed to have that capacity, those capabilities and those skills required to effectively perform their roles and quickly. They certainly do not at present. A well-funded and resourced local Catchment Based Approach (CaBA) body would be able to work with the regulators much better. Only the EA is (we guess) regionally organised at present. This is sensible. The regulatory roles needed in relation to water should be unified perhaps into one body.

One local example might help. The main River Cam tributary comes from Essex into Cambridgeshire. Essex develops housing on its closest border to Cambridge to service jobs in Cambs. The River Cam coming out of Essex into Cambridgeshire is of 'Poor' water classification. It is polluted, but that water all flows into our area; the polluters are in (Essex) but not under any Cambridgeshire Local Authority.

The trap that Governments of all stripes have been in is to see the supply of clean water to people as **all that really matters in the management of water as a resource**. On this crowded island natural ecosystems have been put under such strain that you cannot expect any longer that natural environment to be an unlimited supplier of our needs. Water companies have had too much sway for too long.

Section 4: Questions on Chapter 4 – Economic Regulation

28. To what extent do you think the economic regulatory framework is delivering positive outcomes?
For the environment, not at all! The reason for this is that we do not have a water saving culture and taking water from the aquifer, exclusively, is severely damaging our Chalk streams. (Golf courses water their greens with cheap water in summer while aquatic Chalk ecosystems die).

29. How do you think the Price Review process should balance the need to keep customer bills low with the need for infrastructure resilience?
(Infrastructure resilience is the ability of an organisation's infrastructure, and the skills to run that infrastructure, to avoid, cope with, and
recover from disruption in its performance)
Please answer and explain below, providing supporting examples or evidence, where possible:

You cannot and should not keep prices low if water is wasted, as it is, in this region. Chalk aquifer water is superb, needing little treatment before supplying to households. It is wasteful to use such a good product for toilet flushing, watering gardens, etc, just because it is so cheap. (2000 times cheaper than petrol) We need therefore in the long term to obtain water from a far wider array of sources. We could need to have no more than 80 litres per head per day.

30. What, if any, changes could be made to the Price Review process to better enable the water industry to deliver positive outcomes?
Please answer and explain below, providing supporting examples or evidence, where possible:
Some system of differential pricing will be needed for water so that the poor have enough and the wealthy pay more. That could be done.

31. What, if any, changes could be made to the Price Review process on assessing and setting base expenditure to effectively support infrastructure maintenance?
Please answer and explain below, providing supporting examples or evidence, where possible:

We are heartily in favour of our winter river flows providing water for reservoirs (such as that planned for Chatteris). That reservoir, or similar, needs to replace the Chalk aquifer gradually as the main source of water for public supply.

32. What, if any, changes could be made to the Price Review process on assessing and setting enhancement expenditure to effectively support
infrastructure improvements?
Please answer and explain below, providing supporting examples or evidence, where possible.:

33. What, if any, changes could be made to the Price Review Process on assessing and setting the Weighted Average Cost of Capital (WACC) to effectively attract investment in the water industry? Please answer and explain below, providing supporting examples or evidence, where possible.:

34. What, if any, changes could be made to the Price Review process on assessing and setting performance incentives to effectively secure infrastructure delivery? This could be across Outcome Delivery Incentives (ODIs) to effectively deliver for customers, the environment and public health; and/or across Price Control Deliverables (PCDs), for example
Please answer and explain below, providing supporting examples or evidence, where possible.:

Customer Bills
35. To what extent does the economic regulatory framework deliver acceptable water bills for customers?

Water Bills from Cambridge Water give good information on the cubic metre consumption total for a six month period for a property. If a water saving culture is needed (as it is here), we would be benefited by:-

- Greater education in all water saving measures. (see 44 below)
- Bills enabling you to calculate usage per person per day in that household.
- Bills going to each paying customer so that all individuals may track their own usage.
- Smarter universal metering that daily gives a household its own consumption in litres.

We are in close contact with Cambridge Water and do meet them annually and ask for such things. We enjoy amicable relations with their Company staff.

36. What, if any, changes would help ensure customers are paying fairly for the water they use? (Please select all that apply)
No changes are needed
If you selected other, please specify below:

Customer Protections

37. To what extent does the regulatory framework protect customers from poor service?
To a some extent

38. To what extent does the regulatory framework ensure that vulnerable customers are effectively supported?
To a great extent

39. What, if any, changes to the regulatory framework would better incentivise water companies to deliver and maintain high customer
standards? (Please select all that apply)
Cambridge Water do investigate customer queries well.

40. What, if any, changes to the regulatory framework would improve support for customers in vulnerable circumstances?

Principally we need

- To ensure a proactive approach by water companies in identifying customers eligible for additional support.

Financial Resilience

41. To what extent is change required to the economic regulatory framework to support water companies' financial resilience?
To a great extent

42. Which of the following changes to the economic regulatory framework, if any, would improve outcomes for the water industry? (Please
select all that apply)
Other (please specify)
If you selected other, please specify below:

The water companies have become embroiled **in a responsibility** for river care (flow, aquifer use, water quality, etc.). This is the result of the power that they have been given over the whole of the water environment. The EA, in particular, has been a watch dog but seemingly not had the power or resources to bring them to book. It was the EA that asked our local authority from where the water is going to come for all the new Cambridge Area developments. The Agency is asking the right questions.

Water companies can certainly have conflicting interests. e.g. Cambridge Water has some power to encourage water saving by (for example) by having a hose pipe ban in a drought

year. Yet in dry and hot weather, water use increases 20-30% in summer months. This extra water is paid for by customers. The loser is the environment.

It has been groups like Cam Valley Forum, in this catchment, that discovered that Anglian Water STWs are often emitting way too much phosphate from their overloaded treatment works. Combined Sewage Overflows are another case in point. It was our citizen science monitors that demonstrated that the Cam was unhealthy for swimmers on account of E.coli and other coliforms. Now that the EA has granted us a DBA area, for swimming in Cambridge, Anglian Water are having to spend large sums on improving many of their water treatment/recycling centres.

Please look at the Cam Valley Forum website and see the host of publications we have put out. https://camvalleyforum.uk/publications/.

We do get on quite amicably with our local water companies. However, the water companies alone cannot possibly fund the infrastructural changes that are now so desperately needed to remedy the industry. In reality, sustainable development has never been properly practised in Britain.

The place to level with that reality is first to implement an effective Catchment Based Approach (CaBA) framework in conjunction with a higher tier of shared Water Resources management that is total independent of the water supply industry.

43. Do you think there is evidence on the historical relationship between debt, dividends, and expenditure at water companies that the commission should be looking at?
Please answer and explain below, providing supporting examples and evidence, where possible.:

See response to Q 42 above.
The price we now pay for water cannot possibly pay for the infra structural needs that we now have. The water companies admittedly have a monopoly locally. Privatising them is in no way guaranteed to remedy the situation. It has been Government's long term inattention to sustainability, lack of green vision and lack of investment in effective regulation that is the problem.

Investment

44. To what extent does the economic regulatory framework support or hinder investment into the sector?

Where water supplies are scarce, and the environment harmed saving water is in need of promotion. Water Companies do this to some extent but we need a greater water saving culture. Can Valley Forum has done much to support this (CVF water saving tips. August 2024) https://camvalleyforum.uk/publications/.

45. How do financial returns in the water sector compare to other similar sectors (for example, energy)?

Please answer and explain below, providing supporting examples or evidence, where possible.:

As we have said water has been too cheap for too long. But putting all the needed expenditure on the consumers water bills is not feasible either.

Shareholders in the water sector have been well rewarded, but had the companies made all those profits over to investment in the infrastructure needed it is doubtful that it would be enough. That does not justify the high salaries of their executives.

Anglian Water are in a slightly dodgy place in Cambridge, as they own half the land of their major STW site at Milton and stand to gain greatly by selling it for a large housing development. They were not privatised to act as such property speculators. Their duty locally is investment in waste-water recycling.

46. What options, if any, would incentivise investment in the water sector?
Please answer and explain below, providing supporting examples or evidence, where possible.:

47. How does the public and political portrayal of water companies in the media and elsewhere affect the attractiveness of the water sector to investors?
Other
If you selected other, please specify below:
With a developed greener CABA model in place the right place for investment is possibly from our own (wealthy) local community. This was the historical roots of our pioneer Cambridge Water Company. Cambridge should be ashamed of its bad state. Our community of people and local enterprises could take more responsibility for it.

Competition

48. To what extent should further competition in the water industry be encouraged through regulation?
Please answer below and provide evidence and examples, where possible:

49. Which of the following schemes, if any, have failed to provide effective levels of competition and efficiency? (Please select all that apply)

50. Which of the following changes to competition schemes, if any, would improve outcomes for the sector? (Please select all that apply)
If you selected other, please specify below:

51. To what extent would greater market tendering of infrastructure delivery projects improve outcomes?
Please answer and explain below, providing evidence and examples, where possible:
Water Industry Public Policy Outcomes

52. Do you believe that legal and/or regulatory requirements would benefit from review or consolidation?
Please answer and explain below, providing evidence and examples, where possible:

Section 5: Questions on Chapter 5 – Water Industry Public Policy Objectives

Protecting the Environment

53. Do you believe that the system of environmental regulation, monitoring and enforcement is ensuring water company compliance with
environmental standards?
To some extent

54. Which of the following changes to water industry environmental regulatory requirements, if any, would improve outcomes from the
sector? (Please select all that apply)
A review and rationalisation of the water industry environmental legislative framework, Legislative reforms to address current and emerging threats
If you selected other, please specify below:
Could the EA not operate on a stronger scale with a better developed groups operating under a CABA focus?

55. Which of the following changes to the water industry environmental regulation, monitoring and enforcement framework, if any, would
improve outcomes for the sector? (Please select all that apply)

Other (please specify)
If you selected other, please specify below:

We need enhanced monitoring, including reform of operator self-monitoring and we certainly need swifter enforcement. However, these need to be locally anchored in an enhanced and local 'Catchment Based Approach'. The attrition of our water environment in each area needs to be recognised and remedied.

Delivering Clean Drinking Water

56. What changes, if any, could be made to the drinking water regulatory system to maintain world leading drinking water quality? (Please
select all that apply)
Updates to drinking water quality standards
If you selected other, please specify below:
Securing Resilient Water Supply

57. To what extent is the overall water regulatory framework securing resilient long-term supplies of water?
To some extent

58. What changes, if any, could be made to the overall water regulatory framework to ensure it can secure a resilient long-term supply of
water? (Please select all that apply)

We most urgently need abstraction reform. In the Cambridge Water WRMP 24 there is a very small start made, and there is a trajectory now agreed. This we welcome. However, such is the scale of development locally that it is impossible to introduce the greater abstraction reductions needed, for a return of Chalk stream flows to normal.

We are not sure whether our region has enough river water for the greater number of reservoirs we need to meet both development and environmental protection.

Better shared resource planning is not going to happen without a better understanding of our ecological systems, sound enterprise models and intelligent and enforced regulation. We suspect that your Cunliffe review (which was hugely needed!) has not been as well-framed in this 'greener' sense as it might have been in this one respect. One of the greatest difficulties in devising any East Anglian environmental regulatory system for water is the need for an agreed National Land Use Policy in operation. This is crucial as we are likely to become short of food nationally if freshwater resources diminish. With Climate Change as a recognisable hazard the precautionary principle needs to apply here. Furthermore, the funding for constructing needed reservoirs in the past was locally turned down by Government (and court rulings) on the grounds of it being an inappropriate land use. As you well know Fenland has generally had high land value grading (1or 2) and as such the governmental mind set has been hostile to Reservoirs in the Fens as an alternative land use.

59. To what extent does the overall water regulatory framework support or hinder infrastructure resilience? When considering your answer,
please think about future pressures including factors such as climate change and population growth.
Not Answered

60.To what extent does the overall water regulatory framework support or hinder infrastructure security? When considering your answers,
please think about evolving security threats such as cyber security.
Not Answered

61. To what extent does the overall water regulatory framework support or hinder effective management of supply chain risks? When
considering your answers, please think about disruption in and constraints from supply chains.
Not Answered

62. What changes, if any, could be made to the overall water regulatory framework to better support infrastructure resilience? (Please select
all that apply)
If you selected other, please specify below:

63. What changes, if any, could be made to the overall water regulatory framework to better support infrastructure security? (Please select all
that apply)
If you selected other, please specify below:

64. What changes, if any, could be made to the overall water regulatory framework to better manage risks from supply chains? (Please select

all that apply)
If you selected other, please specify below:

Innovation and technology

65. To what extent does the overall water regulatory framework currently support or hinder innovation?
Not Answered

66. Which of the following changes in the sector, if any, would enable innovation outcomes? (Please select all that apply)
If you selected other, please specify below:

67. What opportunities, if any, do new technologies present for companies and the regulators?
Please answer and explain below, providing evidence and examples, where possible. :

Section 6: Questions on Chapter 6 – Ownership

68. What impact, if any, has consolidation of water companies had on their performance?
Please answer and explain below:

We have three companies in our catchment, Affinity Water, Cambridge Water and Anglian Water. One might argue that we should have only one. The first takes our catchment water (by abstraction) to Hertfordshire, the second (over abstracts) the third pollutes the remaining residual flow. That is not a sustainable development.

69. What impact, if any, does whether or not a water company is listed on the stock exchange have on their performance?
Please answer and explain below:

70. What impact, if any, do complex company structures like Whole Business Securitisation have on water company performance?
Please answer and explain below:

71. What impact, if any, does the type of investor (for example, private equity firms, pension funds) have on water company performance?
Please answer and explain below: