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Dear Robert

Waterwise response to the draft Water Resource Management Plan consultation of Scottish Water

This letter summarises our initial views of the draft Water Resource Management Plan (dWRMP) of Scottish Water.

First, we would like to make some general observations:

1. We recognise that Scottish Water operates under a significantly different context to English water companies, in terms of regulation, ownership, infrastructure and hydrology.
2. One aspect of this context is the extremely dispersed and fragmented distribution network, which as SW observes has resulted in 70% of water resource zones providing water to just 1% of the population.
3. Waterwise recognises that advice conventionally given to water companies may not therefore be appropriate to SW.
4. However, we feel demand management measures can still play a part in addressing the supply-demand deficit which SW observes in 44% of its customer base. It is noted that currently, demand management is not sighted as a WRP08 option.

As mass roll outs of programmes such as water efficiency retro-fits and universal metering may be cost ineffective due to a dispersed distribution network, Waterwise suggests the targeting of efficiency programs in regions which maximise benefits. In particular:

1. **Peak demand regions:** SW has sighted peak demand due to a projected increase in the tourism industry as a driver of supply demand deficits. Waterwise would encourage SW to consider the example of other coastal towns in Britain which having faced similar threats are now actively encouraging water efficiency programmes in catering and hospitality industries to reduce peak demands for water during holiday seasons.
2. **Reduced household occupancy rates:** Waterwise would suggest that new-build is targeted to be as water efficient as possible (either through regulation or industry

best practice) in order to mitigate the effects of reduced occupancy rates, which are likely to drive per capita consumption higher.

3. **Metering:** Whilst Waterwise would hope to see universal metering introduced across Great Britain, it is recognised that neither the regulatory nor the economic drivers are present for full domestic metering in Scotland. We welcome the target of 100% metering of non-household customers by 2009, and would suggest that in such cases there is potential for “easy win” savings of water through offering free water audits and efficiency advice to non-domestic customers and would welcome the inclusion of this service in a revision of the plan. In terms of domestic metering, Waterwise would encourage SW to conduct some of its own pilot projects in domestic metering in order to address any unique local aspects of regulation, cultural acceptability, and project logistics (such as sourcing and contracting), in order to prepare for any future metering initiatives which may occur.
4. **Isolated/vulnerable WRZs:** As SW observe some of the WRZs which are currently most vulnerable to droughts and the projected impacts of climate change are those which have some or all of the following characteristics: isolated from the wider distribution network (preventing transfers), have limited storage capacity, and are dependent on surface water. In such cases, Waterwise suggest that cost/benefit analysis may favour demand management as a means to address supply demand deficits, as connection to the wider network or investment in larger reservoirs will be costly.

Yours sincerely



Jacob Tompkins
Director