

Dawn Instone  
Defra, Water Supply and Regulation Division Area 2C  
Ergon House  
Horseferry Road  
London SW1P 2AL

1 August 2008

Dear Dawn

**Waterwise response to draft Water Resource Management Plan consultations of Cholderton and District Water, Sutton and East Surrey Water and South East Water**

This letter summarises our initial views of the dWRMPs for those Companies whose consultations close on 1<sup>st</sup> August. We also include some general comments, more of which we included in our letters to you of July 25 and 29.

***General Comments***

- 1 We strongly feel that standards and a consistent methodology should be set for and across the water industry. It is often difficult to make comparisons between Companies because their methodologies vary and/or their Plans are presented differently. This makes it especially hard, for example, to figure out why PCC varies so much now and in projections for similar Companies, such as between South East Water and Sutton and East Surrey Water.

***Cholderton and District Water***

- 1 It is disappointing that Cholderton and District aim to achieve only 20 percent metering by 2035; however, given the inability to compulsorily meter and the small number of homes they supply and low likelihood optants, it is understandable that they view metering as difficult.
- 2 Given high capital costs and the low number of properties, all with relatively high PCC, it is disappointing that Cholderton and District have not pursued a water efficiency programme.

***Sutton and East Surrey Water***

- 1 We welcome Sutton and East Surrey's efforts to control leakage, approach commercial users with a combined water efficiency and leakage reduction package, investigate greywater recycling, and trial rising block tariffs.
- 2 We also welcome their commitment to 80 percent metering by 2018, which is close to the *Blueprint for Water's* target of full metering by 2015.

- 3 However, we are extremely disappointed that they have not placed greater emphasis on water efficiency programmes. Given that their PCC is about 180, which is about 10 litres higher than in surrounding areas, and that they have undertaken significant water efficiency trials and research, it is surprising that they have proposed nothing more than a baseline programme.
- 4 We welcome their innovative water efficiency R&D programme, for example their Preston water efficiency project, but are disappointed that they have not yet applied the results of their research and scaled up their efforts.

### **South East Water**

- 1 We are pleased to see that South East Water will be taking into account the *Waterwise Evidence Base for Large-Scale Water Efficiency*, and the Government's aspirational target of 130 PCC for new homes.
- 2 We also welcome their metering programme that aims to achieve 90 percent penetration by 2020. While this is not in line with the *Blueprint for Water's* target of full metering by 2015 in areas of water stress, we are pleased to see that South East Water are progressing relatively quickly toward full metering.
- 3 We welcome South East Water's water efficiency research, particularly their 'Savings on Tap' and retrofit projects; however, we are disappointed that they are not as yet proposing the scaling up any of these activities. We hope that the publication of the final *Waterwise Evidence Base* report may influence this.

We will be sending further letters with more general and specific comments as the consultation deadlines approach. For more information or clarification, please contact me on 0207 344 1841.

Yours sincerely



**Jacob Tompkins**  
Director

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