



**NORTHUMBRIAN  
WATER**



**Northumbrian Water**

**Statement of Consultation  
Response to draft  
Water Resource Management  
Plan 2014**



**November 2013**



**Northumbrian Water  
Draft Water Resources Management Plan 2014  
Statement of Consultation**

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## 1.0 Background

The requirement for water companies to produce a Water Resources Management Plan is formally set out in the Water Resources Management Plan Regulations, 2007 and the Water Resources Management Plan Direction, 2007. The 2014 Periodic Review (PR14) water resources planning process is effectively regulated by Defra, the Environment Agency and Ofwat through their planning guidance.

Organisations consulted before and/or during production of the draft Water Resources Management Plan (dWRMP) document included Defra, the Environment Agency and Ofwat,

Statutory consultees of the published draft version of this document as required under the Water Resources Management Plan Regulations 2007, were:

- Ofwat
- Environment Agency
- Secretary of State (c/o Defra)
- All Local Authorities in the area of the Plan
- Natural England
- The Historic Buildings and Monuments Commission for England
- Navigation authorities operating in the area of the Plan
- The Consumer Council for Water

In addition Northumbrian Water welcomed comments and representations from the wider community, including customers and other interest groups.

Written representations on this dWRMP were sent to the Secretary of State (c/o Defra's Water Supply & Regulation Division) and were then forwarded to Northumbrian Water at the end of the consultation period.

The consultation period on Northumbrian Water's dWRMP was 12 weeks long, commenced on 13 May 2013 and closed on 4 August 2013. During this period the plan was available on the Company's website.

Section 4 of the Water Resources Management Plan Regulations, 2007 indicates that Northumbrian Water must produce a consultation statement (i.e. this document) detailing:

- (a) the consideration that it has given to representations
- (b) any changes that it has made to the dWRMP as a result of its consideration of those representations and its reasons for doing so; and
- (c) where no change has been made to the dWRMP as a result of its consideration of any representation, the reason for this.

The Statement of Consultation (i.e. this document) has to be produced by Northumbrian Water, 26 weeks after the start of the consultation period i.e. 8<sup>th</sup> November 2013 and will be available later on our website.

## **2.0 List of Respondents**

Comments on Northumbrian's draft WRMP were received by Defra by the end of the consultation period from the following organisations; as listed in alphabetical order:

- Consumer Council for Water
- Environment Agency
- Natural England
- Ofwat

No responses were received from individuals (neither customers, nor the general public).

A summary of the responses received and Northumbrian Water's consideration of each is indicated in the following section.

### 3.0 Summary of Representations and Consideration Given

#### **CONSUMER COUNCIL FOR WATER**

In their overview of Northumbrian Water's dWRMP CCWater made a number of comments some of which were complimentary of our approach and some making suggestions for future plans in particular:-

##### CCWater comment

CCWater stated they thought NW could improve its presentation to produce a much clearer WRMP

##### NW response

There is always a struggle balancing enough technical data to inform the regulators of full compliance with the planning Guidelines, yet making it interesting and readable enough for customers to engage with. On this occasion we did improve our non technical summary and for the next time we will further improve this summary to make it the "public" version of our WRMP.

##### CCWater comment

CCWater would like to see NW engage more with its customers to ascertain their views.

##### NW response

The highest amount of customer engagement the company has undertaken so far has taken place with our customers for PR14, including the valuable Customer Challenge Group (called the Water Forum at NW). However, with no new water resources needing to be developed over the 25 years and a large supply demand balance surplus, customer views have been sought on more pressing issues for the region. Whilst we will try to seek customer's opinions more in the future, unless we have real decisions for them to make with respect to water resource planning we risk being accused of wasting their time.

##### CCWater comment

CCWater requests NW review its plan to selectively meter customers on change of occupancy from 2025 in light of research indicating that customers are opposed to compulsory metering.

##### NW response

The selective metering of customers on change of property occupier from 2025 is our current strategy, but not cast in stone. A fuller explanation of our thinking around metering and the costs of optant and selective metering, along with estimated water savings, are now given in the updated metering section (section 5.4) of the Final WRMP. Prior to any possible introduction of selective metering in 2025, full discussions will be held between the company and CCWater, as well as with many other stakeholders.

CCWater comment

CCWater would like reassurance that NW has considered the potential impact of changes in water quality on its water supplies and future resilience.

NW response

Close cooperation between the water quality and water resource teams is always maintained within NW. However, low levels of both pollution and algal events are experienced in the North East. Most of the water quality issues are tending to be around water turbidity from the ground water sources. These get classed as “outage” events. We are now bringing maintenance programmes in for the ground waters, including full borehole refurbishments, to lower this level of outage by removing the build up of turbidity from the bores. There is more detail on this in the revised Berwick WRZ section and outage section of the Final WRMP. Some Berwick bores are also seeing an increase in nitrate concentrations. However they are still comfortably below the Drinking Water Standard (DWS) and projecting the increase forward shows they will not fail the DWS over the next 25 years. To reverse, or at least slowdown the rate of increase, the EA are actively working with farmers to reduce the amount of nitrate able to enter the water sources. This is detailed further in section 3.1.2.

CCWater comment

CCWater considers the consultation would have benefitted from the addition of some questions to help customers focus on and respond to the issues in a relevant way.

NW response

Thank you for this useful suggestion. We will try and incorporate it for the next draft plan consultation.

**ENVIRONMENT AGENCY (EA)**

There are 3 sections to the EA response:-

Compliance with WRMP Direction -

NW has not set out frequency at which it might implement Emergency Drought Orders.

NW has not included an assessment of greenhouse gas emissions for its current operations.

Clarity on NW’s metering programme.

The company has not set out an estimate of customers that could be metered because of high water use, and the demand savings expected from this.

The company has not clearly set out the demand savings as a result of its optant metering programme and also the cost of the continuation of this programme. Neither has the company set out the costs of a selective meter programme.

NW has not set out information on how it will implement its final planning metering programme.

#### NW response

NW, with a Level of Service of “never” for Temporary Water use Bans and Drought Order bans, does not expect to use Emergency Drought Orders ever. This is now stated in the text in section 2.6.1.

An assessment of greenhouse gas emissions from its current water operations is now included in section 3.6.

The number and water savings from selectively metering domestic large water users is now detailed in section 5.4 of the plan. This is the fully revised metering section.

The cost and demand savings from an optant and selective metering policy is now clearly set out in section 5.4, the revised metering section.

The company has now set out how it will implement its optant metering strategy in section 5.4, the revised metering section.

#### EA Recommendations –

1. Security of supply in the Berwick and Fowberry Resource Zone. NW has not presented sufficient evidence showing it can provide a secure supply to the resource zone. In particular, such components as demand forecasting, the assessment of climate change and headroom.

2. Resilience in the Berwick and Fowberry resource zone. (Linked to 1 above) a better explanation is required as to why a previous proposal to link the two areas of the WRZ has not been implemented during this AMP5 period.

#### NW response

We have fully revised the whole of the Berwick section (section 3.3.1) to include a fuller explanation of the current sustainability issues, maintenance issues, future plans for the WRZ and the studies to answer the sustainability issues.

The impact of Climate Change on our ground waters in Berwick is included in section 6.2 and Appendix G.

The headroom calculation for Berwick has been re-done for the draft Final Plan and details are now given in section 7.3.

We believe the components of demand such as the number of unmeasured and measured customers, population growth, property growth, non household demand and leakage are well understood and form a credible demand forecast. In very small WRZs such as Berwick small changes to any outturn figures seem to have a disproportionate effect on demand components compared to those changes in large WRZs. However this is not exclusive to the Berwick WRZ and occurs in all small WRZs. We always endeavour to improve certainty and will continue to do so.

## EA suggested Improvements –

### EA comment

Assessment of sustainability changes. Lack of a description of the effects of proposed sustainability changes on DO.

### NW Response

This assessment of the effect on DO has now been included in section 3.3. Whilst the result remains an insignificant impact on the company's supply demand balance the figures are now included to show this.

### EA comment

Development of existing methods to assess supply forecasts. Comment on use of Aquator to determine DO.

### NW response

The Aquator model is now being built, with input from EA personnel, but will not be complete in time for this Final WRMP. The outcome from changing from *i-think* to Aquator will be detailed in the 2014 WRMP Annual Update. This has been added to section 2.5.

### EA comment

Assessment of Climate Change impacts to supply. Comment on completeness of assessment of climate change.

### NW response

Between the draft WRMP and this draft Final Plan the ground water model was built which has allowed us to complete the work on the effects of climate change on ground water resources. The new work is summarised in section 6.2 and further detail on each ground water is given in Appendix G. The impact on our ground waters is similar to the effect on our surface waters, both being insignificant.

### EA comment

Outage Assessment. There is insufficient evidence in the plan to show that NW has reviewed its outage appropriately.

### NW response

The outage assessment was carried out using the recommended outage methodology using records of outage events experienced since 2010. This is the first time the company has followed the standard methodology. A better description of the method and data used is now contained in section 3.4. We were questioned about why outage does not change over time in the plan. This is not something that happens as the method looks at the actual events, planned and unplanned, that have occurred in the recent past and calculates a probability figure for outage going forward. The same figure is usually constant over the planning horizon for all water companies.

EA comment

Preferred metering programme. NW's preferred metering programme is not clearly set out in the plan.

NW response

Further details on all aspects of metering, including the company's preferred plan is now fully detailed in section 5.4.

EA comment

Approach to supporting technical information. The plan presents limited information and references to support the methodologies used and the assumptions made by the company to develop its plan.

NW response

We have put much more detail of the data used in the methods throughout the draft Final Plan. This includes a new Appendix G which includes the output from the ground water climate change methodology.

**NATURAL ENGLAND**

NE comment

Both water supply zones contain nationally and internationally designated sites, protected species and wider biodiversity interests. NE draws attention to some specific nature conservation issues at Cow Green reservoir, in the River North Tyne downstream of Kielder reservoir and on the River Till within the Tweed SAC in the Berwick WRZ.

NW response

Should our abstractions change significantly from Cow Green or the Tyne, we would consider an environmental assessment of any impact on designated sites. However the plan shows a declining demand for water over the 25 years which would not result in any significant effects. The effects of abstraction from the Berwick ground water sources on the Till will form part of our investigations in the Berwick WRZ and more detail is now in section 3.3.1.

NE comment

Natural England supports the work being undertaken in the Berwick and Fowberry Zone to better understand the functioning of the Fell Sandstone Aquifer and any impacts of abstraction from this groundwater source. In view of likely sustainability reductions, we draw attention to the need to ensure any relevant impacts are assessed in relation to the River Tweed SAC, a European protected site.

NW response

A much fuller explanation of the work planned for the Berwick WRZ has now been added to section 3.3.1.

NE comment

NE would expect further clarification of the position regarding possible transfers and trading of water supplies with neighbouring water companies including Yorkshire Water and United Utilities, including environmental assessment requirements.

NW response

There has been no further contact from either of the companies on water transfers to date. Should anything arise outside of this WRMP then we would, of course, open discussions with NE.

NE comment

We would expect the company to adopt the highest possible standards of demand management and water efficiency activities including leakage control, metering and other activities and communications around water saving. The company may wish to review whether it has placed sufficient emphasis on this in the draft Plan in view of the finer balance between supply and demand in the Berwick WRZ and future sustainability.

NW response

We believe that our demand management activity planned is suitable for the NW situation given the importance of spending our customer's money wisely. There has been an increase in the number of optant meters from the draft Plan (section 5.4) and a re-balancing of the leakage target to lower the target in the Berwick WRZ (section 3.3.1).

NE comment

In view of water quality issues in the Berwick WRZ, we raised the need to consider catchment schemes where these can achieve both water quality and water resource benefits.

NW response

A fuller description about the catchment work to reduce the increase in ground water nitrates in the Berwick WRZ is given in section 3.1.2.

**OFWAT**

OFWAT commented on 4 areas of the dWRMP one of which was to state that they had no concerns over the Final Planning Solution and scenario testing section of the plan. The other points concerned:-

Ofwat comment

Incorporation of stakeholders views in particular the results of the qualitative research and willingness to pay surveys undertaken as part of the 2014 Business Planning process.

NW response

We do not plan for any investment in water resources or demand management (beyond the statutory requirements) that could be part of any

customer consultation or willingness to pay surveys. The only area that could have been open to customer discussion would have been around reducing the current Level of Service (LoS) offered. However maintaining the current LoS does not require any additional expenditure and reducing the LoS does not save any costs. The Customer Challenge Group agreed that this was not a worthwhile question to ask customers. Further detail about the LoS is contained in section 2.6.

Ofwat comment

Baseline Supply Demand Balance. OFWAT suggested that the final plan should reflect the outcome of sustainability reductions discussions with the EA and also include further information on demand savings it is forecasting as a result of its metering programme.

NW response

Additional information has been added about possible sustainability changes in Berwick WRZ in section 3.3.1. The effect on DO for the Kielder WRZ is detailed in section 3.3. The demand savings and costs from metering are now detailed in section 5.4.

Ofwat comment

OFWAT comment that NW has not considered any additional demand management options as discretionary investment beyond its baseline activities to meet customer preferences.

NW response

With such a very large surplus of water at the end of the planning horizon, and many more demands on investment throughout the business, we do not consider that any further demand actions below those planned would be in the best interest of our customers. We are already planning a similar level of water efficiency as was carried out in AMP5, the leakage target is being further reduced and metering, beyond optant metering, is not favoured by our customer's.