



House of Commons
Environment, Food and Rural
Affairs Committee

Water Pricing: follow- up: Government Reply to the Committee's Report

**Fifth Special Report of Session
2004–2005**

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The Environment, Food and Rural Affairs Committee

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FIFTH SPECIAL REPORT

The Environment, Food and Rural Affairs Committee reported to the House on *Water Pricing: follow-up* in its Nineteenth Report of Session 2003–04, published on 1 December 2004 as HC 1186. The Government's Reply to the Report was received on 22 March 2005.

Government response

Transparency of the review process

Recommendation 1

We are disappointed that Ofwat felt it could not be clearer about which maintenance and improvement programmes were allowed for in its draft determination of price limits. We hope that this is resolved in its final determination of price limits, in order that customers and other stakeholders may have the clearest possible understanding of what they can expect water companies to deliver. If Ofwat chooses not to present this information, it should write to us explaining its decision. (Paragraph 11)

Alongside its final determination of price limits Ofwat published a list of improvement schemes that it expects the companies to undertake in the period 2005-10. These can be found on Ofwat's website.¹ This will allow customers and other stakeholders to understand what improvements they can expect the companies to deliver. It is also important, by a clear specification of what is expected, to focus the companies' attention on the outcomes expected from the price limits, not the inputs.

Ofwat will publish reports on companies' progress in delivering these outputs. At the draft determination stage Ofwat judged that it would have been impracticable and misleading to publish a list of individual improvement schemes at what was a provisional stage before many schemes had been fully scrutinised. However, lists of schemes were shared with quality regulators who were able to scrutinise them further as part of the draft determinations process. The Guidance (RIA was not published until after the draft determinations) published by the Secretary of State in advance of final business plans and draft determinations in conjunction with the advice to the Secretary of State published by the Environment Agency and the Drinking Water Inspectorate, made clear the improvement policies Ministers were expecting companies to deliver and, in broad terms, the environmental and drinking water benefits that would be achieved.

¹ http://www.ofwat.gov.uk/aptrix/ofwat/publish.nsf/content/pr04fd_projectschedules

Recommendation 2

We recommend that Ofwat considers WaterVoice's suggestions for clearer ways to explain to customers the impact of changes in price limits during its evaluation of this price review. (Paragraph 13)

In its final determinations Ofwat set out the implications for domestic customers' bills of price limits by including average figures. This is consistent with the approach taken to explain the implications of companies' proposals in final business plans and Ofwat's proposals at the draft determination stage. It facilitates comparisons. However, Ofwat recognises that the average varies for each company and for individual customers of those companies. The table below from 'Future water and sewerage charges 2005-10: Final determinations' (Table 4) sets out the average expected household bill for each company by 2009-10.

Table 1: Average expected household bills²

Company	Average annual household bills (£) ³							
	2004-05		2009-10		Change			% change
	Water	Sewerage	Water	Sewerage	Water	Sewerage	Total	
<i>Water and sewerage companies</i>								
Anglian	122	172	140	173	18	1	20	7
Hartlepool	94	–	108	–	14	–	14	15
Dŵr Cymru	123	163	153	199	30	36	65	23
Northumbrian	100	132	114	146	14	14	28	12
Essex & Suffolk	132	–	153	–	21	–	21	16
Severn Trent	116	105	133	132	16	27	43	20
South West	126	231	179	265	53	34	87	25
Southern	91	168	110	214	19	46	65	25
Thames	113	98	156	104	44	7	50	24
United Utilities	133	136	147	175	14	39	53	20
Wessex	126	151	170	177	44	26	70	25
Yorkshire	117	126	133	155	17	28	45	18
WaSC average (weighted)	118	132	142	155	24	23	47	19

² This table is quoted in 2004-05 basket year prices. All other figures quoted in this document are in 2002-03 financial year average prices unless otherwise stated.

³ The actual impact on customers' household bills will also be governed by companies' approved charges schemes.

Company	Average annual household bills (£)							% change
	2004-05		2009-10		Change		Total	
	Water	Sewerage	Water	Sewerage	Water	Sewerage		
Water only companies								
Bournemouth & W Hampshire	107		122		15		15	14
Bristol	108		122		14		14	13
Cambridge	91		101		10		10	11
Cholderton	136		166		30		30	22
Dee Valley	107		106		-1		-1	-1
Folkestone & Dover	143		176		33		33	23
Mid Kent	131		151		19		19	15
Portsmouth	77		80		4		4	5
South East	129		151		21		21	16
South Staffordshire	91		106		15		15	17
Sutton & East Surrey	127		143		16		16	13
Tendring Hundred	162		158		-4		-4	-2
Three Valleys	118		138		20		20	17
WoC average (weighted)	113		129		16		16	14
Industry average (weighted)	117	132	140	155	23	23	46	18

Ofwat has also published estimated 'typical' bills to illustrate the likely effect on both unmeasured and measured customers for those customers that do not opt for a meter, and do not vary their consumption over the period 2005-10. The table below (Table 16 from 'Final Determinations') sets out the change in typical unmeasured and measured bills over the period, but does not take account of the savings that some customers will make as a result of switching to a measured supply. The individual company pages included in 'Final determinations' set out for each company these figures for each year for which price limits are set. These figures are provided for illustrative purposes and cannot reflect the actual impact on individual customers' bills of the price limits. This will become apparent once companies have submitted their charges schemes and Ofwat has approved them. Ofwat has published its average bills leaflet on its website which sets out increases to the average household bill for 2005-06.

Table 2: Change in typical measured and unmeasured bills

Company	Household bills (£)					
	2004-05		2009-10		% change	
	Measured	Unmeasured	Measured	Unmeasured	Measured	Unmeasured
<i>Water and sewerage companies</i>						
Anglian	244	354	272	401	11	13
Dŵr Cymru	177	314	228	411	29	31
Northumbrian	211	251	245	289	16	15
Severn Trent	200	230	255	282	27	22
South West	273	442	375	636	37	44
Southern	239	271	311	356	30	31
Thames	196	215	239	270	22	26
United Utilities	246	279	305	349	24	25
Wessex	227	302	292	407	29	35
Yorkshire	205	259	247	319	21	24
WaSC average (weighted)	222	263	271	323	22	23
<i>Water only companies</i>						
Bournemouth & W Hampshire	90	117	101	143	12	23
Bristol	92	113	112	129	21	15
Cambridge	82	101	91	114	11	14
Dee Valley	78	121	87	119	11	-2
Folkestone & Dover	119	162	147	210	23	29
Mid Kent	112	141	128	168	14	19
Portsmouth	87	77	88	81	2	6
South East	114	137	137	165	20	20
South Staffordshire	90	92	105	110	17	19
Sutton & East Surrey	111	130	125	150	13	15
Tendring Hundred	135	199	130	197	-4	-1
Three Valleys	98	124	115	147	17	19
WoC average (weighted)	101	117	117	136	16	16
Industry average (weighted)	222	261	269	319	21	22

Ofwat also included additional information in appendix 2 of 'Final Determinations'. This was to respond to WaterVoice's concerns by showing illustrative figures for different rateable values and different levels of consumption for each company. It is for the companies to consider tariff proposals which conform with their price limits and to submit their charges schemes for Ofwat's approval. This may include changes in the balance between standing charges and volume or rateable value related charges, which would have an impact on these typical bills. Ofwat will consult each relevant WaterVoice Committee as part of its approval process. The actual impact of the price limits Ofwat sets on individual customers will become clear when the companies send out their bills for 2005-06 ahead of the charging year beginning 1 April 2005. Ofwat remains concerned that customers should not be misled by generalised figures which may not reflect their own bills.

Recommendation 3

The controversy over the cost of the environment programme risks giving the impression to customers that water bills are a source of investment for environmental work, albeit vital work, that it would otherwise be difficult to fund. There is no perfect way of presenting information about these costs, but Ofwat should consider how information can be presented to give customers the most accurate possible picture of the costs of and reasons for the environment programme and how they contribute to the overall bill. The Government should also consider making a statement at the start of the process stating in clear terms details of the environmental legislation which the water companies will have to comply with over the five-year period of the pricing review. (Paragraph 15)

The Government welcomes the Committee's recognition that there is no perfect way of presenting information about costs and shares the Committee's concern that the cost of the environment programme should be presented in proportion. Ofwat has presented costs in three alternative ways in the published Final Determinations: the assumed capital costs; the contribution to changes in customers' bills; and the contribution to the overall bill.

Ofwat assumed the capital costs of the environment programme, shown in Table 8 of the final determinations, to be £3,500 million out of the £16,800 million assumed for water companies' total capital expenditure between 2005 and 2010.

The contribution of the environment programme to changes in customers' bills is estimated at £21 out of the net increase of £46 over the five year review period, as shown in Table 6 of the final determinations. In the interests of consistency Ofwat used this 'drivers' table, as developed at previous price reviews, to set out the marginal impact different drivers have on customers' bills. This provides continuity and makes comparisons easier.

The Committee mentioned one reservation about the drivers table, its treatment of efficiency savings. The Committee drew attention to the way in which Ofwat presents

the 'drivers' for price increases, in which it separates out the increases due to improvement programmes and the decreases due to improvements in efficiency. Ofwat has made it clear, in its published material and in explaining its decisions, that whilst the benefits of greater efficiency have been expressed in one line for the sake of simplicity, that efficiency is gained through all the operations of the company, including its capital expenditure on environmental and other schemes. If the assumed improvements in efficiencies are allocated to the individual drivers and netted off against their costs, each would show a lower cost. After such an adjustment the cost of the environment programme as an addition to customers' bills would be £19 rather than £21.

The third alternative way of presenting the cost of the environment programme, preferred by the Environment Agency, is its share of the total average household bill. Tables 14 and 15 of 'Final determinations' give the components of average household bills in 2004-05 and 2009-10. The 2005-10 environment programme accounts for £19 of the 2009-10 average bill of £295.

The Government agrees that it should give the clearest possible statement at the beginning of the process of the environmental legislation that companies will need to meet. This was the purpose of the Initial Guidance from the Secretary of State in January 2003. It was possible to state many policies definitely at that early stage. However, it is important that the Government does not close off the remaining available choices about the implementation of environmental programmes before all the information on those decisions, including the costs and benefits, is to hand. The three instalments of the Guidance, together with the published advice from the regulators, also served the important purpose of explaining the reasons for the measures to be adopted. The Government will consider the content and timing of information that will be most helpful to the next review.

Recommendation 4

We are particularly disappointed that the Government has been slow to address the problems of diffuse water pollution and flooding caused by urban run off and that as a result the costs of these problems fall on water customers. The Government should consider whether charging via water bills is the most equitable way of funding the effects of these environmental challenges as well as the impact of climate change. The Government should make clear, at the earliest opportunity, its plans for solving these problems. (Paragraph 16)

The Government does not agree that it has been slow to address the problems. On the contrary, it has a strong commitment to tackling these problems, but they are not conducive to quick fixes.

One of Defra's areas of focus is to identify further measures needed to address diffuse water pollution. The success of measures to reduce pollution from point sources means that tackling diffuse pollution, particularly in relation to water quality objectives of the Water Framework Directive, is the single biggest opportunity to further improve water

quality in the country. Defra and the Treasury recently consulted on measures to reduce diffuse water pollution from agriculture through the catchment-sensitive farming programme. In contrast with agriculture, where there is strong evidence of the significant contribution made by that sector to diffuse water pollution, the task of quantifying the significance of urban diffuse pollution in relation to Water Framework Directive objectives is more complex, reflecting the wide variety of different sources and the lack to date of a sound and comprehensive knowledge base.

To gain a better understanding of these issues, Defra has already undertaken an extensive review of relevant published material and during 2004 has co-hosted, with the Environment Agency, a series of sector-based workshops. Feedback from those workshops is on Defra's website at:

<http://www.defra.gov.uk/environment/water/quality/diffuse/non-agri/index.htm>.

In November, Defra invited a wide-ranging group of stakeholders to discuss the work done to date and to consider possible options for a way forward. The main conclusion was that although considerable progress has been made, further work is needed on the priorities for action, and that in developing priorities for action it is important to make strong links with the Water Framework Directive, and with its daughter directives, still to be agreed.

Defra is therefore actively improving its knowledge base which is essential to any consideration of possible measures. It is looking to the Environment Agency's refinement of its initial river basin catchment characterisation work, required under Article 5 of the Water Framework Directive, to provide an indication of any targeted approaches that may need to be considered at catchment level. These approaches will also take into account the Community agreed priority list of 33 dangerous substances as listed in Annex 10 to the Water Framework Directive, which are required to be progressively reduced or phased-out, at the latest, after 20 years upon adoption of a daughter directive.

The Committee is also right to recognise that run-off can be a source of diffuse water pollution in many urban catchments and this was discussed in most of the sector workshops held last year. Defra will be considering the scope, extent, sources and impact of urban run-off as part of the further work described above.

The Government has also been setting a new agenda on the problems of urban run-off in relation to flooding. In *Making space for water* the Government proposed that a joined-up approach to drainage management should be pursued in high-risk urban areas. This would involve a joined-up approach across fluvial flooding, pluvial flooding, sewer flooding and groundwater flooding. The Government is also committed to ensuring that take-up of Sustainable Drainage Systems (SUDS) techniques is facilitated where appropriate. The Government hopes to respond later this spring to the points made in the *Making space for water* consultation exercise, including those made about how to take forward the concept of integrated drainage management.

The impact of climate change was explored in the Committee's report on *Climate Change, Water Security and Flooding*: (Sixteenth Report of Session 2003 – 2004). The Government's approach was set out in the Defra memorandum to the Committee of April 2004 and the Government response to the report's recommendations. These set out a clear view of the problems and a programme of work to address them.

In developing policy on all these issues the Government takes full account of the 'polluter pays' principle identified in Article 9 of the Water Framework Directive. Identification is fundamental to the principle being applied successfully and while this is relatively straightforward when dealing with point source pollution, the situation with diffuse pollution is more complex. Where costs are attributable to water company activities and responsibilities, it is right that water customers should meet those costs, but the Government acknowledges the Committee's concern about the apparent inequity in present charging arrangements where water customers could be paying for the pollution caused by others. The Government recognises that those responsible for pollution should be accountable and this is also consistent with the approach of the Water Framework Directive. This will be developed further as part of the implementation of the directive.

The respective roles of Ofwat, the quality regulators and Defra

Recommendation 5

As the price review system stands, it is not for Ofwat to determine the content of the environmental and quality improvement programmes. We are concerned that, if the final determination does not fund statutory requirements, those companies will apply for further increases in their price limits before the next review. This would undermine the value of the price review process. We recommend that the Government examine closely how the regulator has responded to its guidance and to what extent statutory schemes have been allowed for in the price limits. (Paragraph 19)

The Secretary of State for Environment, Food and Rural Affairs for England and the Welsh Assembly Government for Wales set out the legal requirements that water and sewerage companies will be obliged to meet and the policies that they wish the water and sewerage companies to follow. Each of the regulators takes account of this guidance within the framework of their statutory obligations.

Ofwat has a role, on behalf of customers, to ensure that as far as possible value for money is safeguarded. In its methodology paper (consulted on in draft in autumn 2002 and finalised in April 2003) Ofwat said that it would only include within price limits schemes with clearly defined outputs, timings and costs. This is similar to the approach taken at previous price reviews. Where these are not clear, investigative work can be undertaken to enable the projects to be developed to the point where they are capable of

inclusion. Ofwat concludes that to include resources for schemes that are not yet properly defined would be a waste of customers' money.

All the schemes specified by the DWI and almost all the schemes specified by the environmental regulators to deliver the legal requirements and policies in Ministerial guidance and included in companies' business plans have been included in final price limits.

While it is desirable for both companies and customers that price limits should be set for five years without frequent adjustment through interim price determinations, this depends on the availability of information and the completion of scrutiny before price limits are set. The Ministerial guidance, the regulators' detailed requirements for companies' outputs, companies' proposals for schemes to deliver those outputs and Ofwat's decisions on price limits can only take account of the information available at the date that they are set. Policies, programmes, schemes and costs become more defined and alter the picture during the review and will continue to evolve after price limits are set. Throughout the process the Environment Agency and DWI kept schemes under review. For some schemes this resulted in recommending further work before a suitable scheme could be identified. In these cases Ofwat included funding in final determinations for such further investigative work rather than the proposed solutions. In a number of other cases Ofwat re-instated schemes in full in final determinations that had been set aside from draft determinations.

The process of defining requirements and schemes more clearly and adding new requirements will necessarily continue between reviews. There are systems in place for schemes to be added in time as they are defined. Ofwat's 'change protocol', published with Final Determinations, sets out how schemes which are not yet properly defined, can be taken forward where necessary before the next price review.

Table 3: The quality improvement programme for 2005-10

	Companies' business plans		Draft determinations		Final determinations	
	No. of projects	Capital expenditure £ million	No. of projects	Capital expenditure £ million	No. of projects	Capital expenditure £ million
Water service						
Drinking water and other obligations	357	2,200	327	1,877	348 ⁴	2,014
Environmental investigations and solutions with ministerial support	218	136	181	60	183	47
Water service total	575	2,336	508	1,937	531	2,061
Sewerage service						
Environment Agency environment programme for 2005-10 with ministerial support and other new obligations	2,967	3,974	2,660	2,435	2,731	2,631
Completion of 2000-05 programme	668	542	689	708	658	819
Sewerage service total	3,635 ⁵	4,516	3,349 ⁵	3,143	3,389	3,450
Total	4,210⁵	6,852	3,857⁵	5,080	3,920	5,512

'Horse trading'

Recommendation 6

We accept that an economic regulator for an inherently monopolistic industry like the water industry can never be a perfect surrogate for market competition. However we are concerned that the bidding process seems to result in such stark differences of

⁴ Includes further projects submitted by companies since our draft determinations.

⁵ 196 projects included in our draft determination have been excluded as they do not have any costs or outputs in 2005-10.

opinion over costs, value for money and the scope for efficiency savings that the regulator, in his draft determinations at least, halved the bid set out by the companies. We recommend that the Government re-examine the methodology of the bidding process to identify the reasons for the striking differences between the companies' and the regulator's positions. (Paragraph 21)

The Committee was concerned that the differences of view between Ofwat as regulator and the regulated companies could be seen as a process of 'horse trading'. As the Committee recognises, there is an iterative process to arrive at the final policies, programme and price limits, which should converge as the review proceeds.

In Ofwat's view it was inevitable that at the time when the Committee took evidence, between draft and final determinations, there would be strong differences of view. Draft determinations were based neither on the full programmes eventually set nor on fully challenged costs. Companies drew up draft business plans in advance of Ministers' final policy decisions on quality policies, and Ministers had to reach their main quality policy decisions on the basis of advice from all the regulators and draft business plan costs that differed from the costs attributed to policies in the final determinations.

Ofwat's conclusion, in its final price limits, is that the companies can deliver all that needs to be done, if they are efficient, for two-thirds of the bill increase which the companies sought. However, in some cases Ofwat has very largely accepted the inputs and outcomes proposed in some companies' business plans – for example those of Yorkshire, Welsh Water and South Staffordshire – whilst not agreeing on every detail. The degree of difference of view between the regulator and the regulated can therefore be exaggerated.

What is important is that the final determinations reflect the information available at the time. In Ofwat's view the fact that no company has asked for its price limits to be redetermined by the Competition Commission is an indicator of the real extent of agreement or disagreement.

Sewer flooding

Recommendation 7

We accept that it may not be possible to address every property at risk of sewer flooding, but we are concerned that the problem appears to linger on from price review to price review, leaving a backlog of properties waiting to be addressed. This is of particular concern given the likelihood of increased risk of sewer flooding identified in the Office of Science and Technology's Foresight report on flood risk and climate change. We recommend that companies prioritise action in those areas at highest risk and that, in examining the cost-benefit ratio of plans presented by the companies, Ofwat consider the distress and inconvenience of those affected as well as economic damage. (Paragraph 24)

Reducing the distress of sewer flooding remains a priority for Government as set out in the guidance on the periodic review. The Government welcomes the attention paid by water companies and Ofwat to sewer flooding in this review. It is the Government's view that as many properties as possible should be protected while also ensuring that the costs to customers more widely are proportionate to the benefits.

In its final price limits, Ofwat has assumed that the ten sewerage companies will now spend approaching £1 billion over the five-year period to deal with the scourge of sewer flooding. Although a value for money challenge remains, Ofwat expects the price limits to allow the companies to resolve or mitigate every known high-risk problem of internal flooding caused by overloaded sewers where the companies' plans said action was needed by 2010. Some homes will come on to the register of homes at risk of flooding once in 10 years for the first time during the five-year period. However Ofwat expects that register to have been reduced to 0.01% of all homes (around 3,100) by 2010, compared with around 8,800 currently. There will also be significant progress in tackling sewer flooding in gardens and public spaces.

The Government recognises that measures to reduce sewer flooding problems may not necessarily be best addressed in isolation. Defra's recent *Making Space for Water* consultation proposed that a joined-up approach to drainage management should be pursued in high-risk urban areas.

Ofwat are continuing their discussion with sewerage undertakers and Government on sewer flooding compensation, insurance and mitigation measures and hosted a second seminar on the subject in February 2005.

Affordability

Recommendation 8

We await with interest the review of the Water Industry Charges (Vulnerable Groups) Regulations and the cross-Government review of the ways in which low-income groups are helped with their water bills. However, we wish to make clear that we believe that many people on low incomes will have spent too great a proportion of their income on water. Adjusting the mechanisms for making payments would benefit some customers and would be welcome as an interim measure. But the Government should also consult on ways to reduce the charges paid by the poorest and on ways that the assistance offered to those on low incomes can reflect the great regional differences in water bills. (Paragraph 31)

The cross-Government report into the review of water affordability was published on 2 December 2004 and the Government's response to the vulnerable groups consultation paper was published on 19 January 2005. The Water Industry (Charges) (Vulnerable Groups) (Amendment) Regulations 2005 were laid before Parliament on 19 January 2005 and came into force on 10 February.

The affordability report concluded that there are already a range of measures in place to assist lower income households with their water and sewerage charges but that there is scope for improving them in the near term. Ways forward for Government, Ofwat and the water industry to tackle these issues are set out in this report, and include improving existing arrangements in the near term and undertaking studies into the effects of the charging system in the longer term. The report notes that the Government is not minded to introduce an explicit linkage between the tax and benefit system and water charges. However, the Government will press on with its policy of promoting fairness and using changes to the tax and benefit system to tackle poverty, for example child and pensioner poverty, more generally.

Following the review an affordability assistance pilot study, involving Government, South West Water and other stakeholders, will be run in the south west to assess the combined impacts of benefits checks, water efficiency measures and metering on low-income consumers.

Long-term issues

Recommendation 9

We are still concerned that the five-year cycle will tend to delay expenditure until the problems become urgent. We recommend that Ofwat, the water companies and the Government use the opportunity of Ofwat's evaluation of the price review process to assess the long-term risks and challenges that the water industry faces and report back to us on how coping with these risks will be funded. (Paragraph 33)

The Government recognises that there is a place for a long-term policy framework for the water industry, given its long-term responsibilities and the lead time on major new policies and investments. At the highest level, this policy framework is set out in *Directing the Flow*, a strategic long-term view of water policy that the Government will treat as a living document to be updated and improved as required. Within that overall framework, the Government will tackle the need for a long-term view on individual policy areas. The time horizon for meaningful forward planning is longer for some policy elements than for others, depending on the availability of information.

On the environment programme, it is not practicable, ahead of the necessary preparatory work on the Water Framework Directive, to establish at this stage a clearly defined environmental quality programme to be undertaken by water companies for the period beyond 2010. However, it is possible, knowing the general direction of improvements, if not their scale and pace, to say that the environmental quality programme in PR04 will help deliver the longer-term WFD requirements. Defra, the Agency and Ofwat will consider further how the timescales of the Water Framework Directive and periodic reviews will fit together in future.

In other areas a longer horizon is practicable and useful. 25 year water resource plans are now an established part of the review process. In respect of capital maintenance,

Ofwat's final determinations set indicative levels of investment to 2020, which should help guard against any tendency to delay necessary expenditure on company assets. At the same time Ofwat considers that it has applied appropriate efficiency challenges.

There are other challenges that face the water industry and need to be taken into account in future reviews. For example, the need for infrastructure to accommodate the impact of increased household growth and climate change.

All stakeholders now have an opportunity to contribute to Ofwat's review of the price review process. The review will look at the fitness of the process for longer-term challenges and the issue of the interval between reviews. The membership of the steering group undertaking this review has been published. John Baker, one of Ofwat's non-executive advisory directors, will chair this group. The steering group members are independent experts. The group has published its terms of reference and has indicated that it expects to publish its findings by the end of July 2005.

Ofwat will, in 2005, be consulting separately on the length of future price review periods, from 2010. It has also previously agreed to undertake a study on financeability issues following related work by Treasury and DTI. The results will be published and the Committee will be informed about the outcome.

Department for Environment, Food and Rural Affairs
March 2005

