

Appendix 18: Dacorum Borough Council

1. Dacorum Borough Council		
1.1	Representation	Our primary concern regarding the rdWRMP is Affinity Water's physical capacity to respond both proactively and efficiently to the cumulative impacts of growth in order to maintain sufficient water supply within its Central supply region (paragraph 1.3.1). It is fundamental to us that there is as much alignment of housing growth with water supply capacity and resilience as is possible given the difference in timescales between your WRMP's and our emerging Local Plan.
	Our Response	<p>We have followed required best practice and planned for growth as per Local Authority plans. Where we have made adjustments due to differences in baseline population and properties and the management of blocks of flats in the forecast, we have clarified this in our plan and technical reports.</p> <p>We recognise that high growth is only within the draft GLA plan, so this is not included in the forecast of baseline demand. Our fWRMP addresses GLA growth through inclusion of a "high-growth" scenario in our sensitivity testing. In the event of a "high-growth" scenario being realised we will rely on some of the less environmentally-damaging drought permits and will accelerate delivery of our first supply option to 2032. We would need a second strategic option by 2042 and a third strategic option within the 2080 time horizon.</p> <p>Additional growth from the CaMkOx development corridor has not been explicitly included as no planning figures are available at the moment but we will continue to review our forecasts as new information becomes available as reflected in our adaptive plan.</p>
	Summary of any change to our final WRMP	Our fWRMP19 addresses GLA growth through inclusion of a "high-growth" scenario in our sensitivity testing.
1.2	Representation	There is a potential issue regarding the timing for the delivery of additional catchment capacity in the Central region with the lack of time to assess climatic risks and invest in sustainable water supply solutions putting pressure on the ability to match the supply with the demand. Misalignment of the dWRMP19 5 year trajectory with Dacorum's Local Plan Period (2018-2036) – Affinity Water's forecast population figures are only 'broadly aligned' with those of local authorities and greater disparity is evident after 15 years due to unstable growth levels.
	Our Response	We are keen to work with you to ensure population figures are fully aligned.
	Summary of any change to our final WRMP	N/A
1.3	Representation	We strongly support your decision to refrain from seeking additional water supplies from vulnerable chalk stream sources, of which Dacorum have several. Thus safeguarding rare chalk stream habitats from environmental damage and depletion.
	Our Response	Thank you for your support.
	Summary of any change to our final WRMP	N/A
1.4	Representation	Furthermore, we support your ambitions to promote behaviour change among customers and businesses regarding water usage to sustainably reduce the consumer demand for water (Per Capita Consumption) from 25 MI/d per property in your supply area in line with the uncertainties of climate change and catchment capacity. Affinity Water should consider making the separation of clean and grey water in new developments compulsory (viability permitting) and look at implementing a best practice design guide for grey water usage. We would like to see proactive network modelling for infrastructure

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		requirements for strategic developments early on in the planning process to safeguard water supply and implement best practice from the outset.
	Our Response	<p>We will reduce PCC to 129 litres per head per day (l/h/d) by 2025 through the continuation of our existing Water Saving Programme and employing new demand management options (this is the largest PCC reduction in the industry for this period). Significant additional explanation and quantification has been added to Chapter 6 of the fWRMP19 to demonstrate how we will meet the 129 l/h/d AMP7 target and the strategy beyond that.</p> <p>We anticipate 80%-meter penetration by 2025 and 90% meter penetration by 2045. We recognise this represents a lower target than at the dWRMP19. This is largely as a result of the higher than anticipated need to install internal rather than external meters, and taking on board experience to date around the practicalities of installing meters internally as well as wider industry learning. An explanation of the reasons for, and very limited implications of, the slower rate of metering as part of the Water Saving Programme are included, along with justification of the approach to smart metering rollout in Chapter 6.2 Our demand management strategy in the fWRMP19.</p> <p>It is not within Affinity Water's control to make grey water recycling compulsory in new developments, however we support the idea as a means of reducing household water usage. This is a matter governed by building regulations and change on this matter would come through government. We have undergone a recent campaign #WhyNotWater, the manifesto here asks the government to introduce obligatory water efficiency labelling, give tenants more rights to water saving products in rented accommodation and to ensure fittings and fixtures meet minimum standards.</p> <p>As part of our WRMP and work around sustainability reductions and our Supply 2040 project, we have undertaken network modelling to suggest network improvements and requirements at this early stage. Our WRMP adheres to the appropriate guidance in that we plan to meet growth proposed by local councils, however it is common that the exact location of these new developments are not known as our WRMP covers a 60year stretch into the future. We will continue to work with local councils and developers during the planning process to safeguard water supplies.</p>
	Summary of any change to our final WRMP	Updated Chapter 6 in fWRMP19.
1.5	Representation	We support your continued research and trialling of smart technological water solutions including advanced meter infrastructure (AMI) with the aim of delivering smart meter technology in the premise by 2045. However, consideration should be given to any issues smart water meters may have on development viability.
	Our Response	<p>Thank you for your support on our approach in delivering smart meter technology.</p> <p>We will be able to use our 'fast logging' initiative contained within our AMP7 programme to understand customer behaviour and hence use that understanding to design the architecture of the smart metering fixed networks (or other information transfer solutions) before we start installing the smart meter devices in homes. We can also learn from the Thames Water experiences when developing our approach. The proposed smart metering programme will deliver 75% of the expected savings before we need to deliver any supply side investment, even under our 'challenging future', so there is very little opportunity cost associated with this more prudent approach.</p>
	Summary of any change to our final WRMP	Updated Chapter 6.2 our demand management strategy to further clarify our approach to smart metering rollout.
1.6	Representation	Affinity Water did not submit a response to Dacorum's Issues & Options Consultation in late 2017. However, Affinity Water are not a local authority statutory consultee as they are only responsible for supplying water. That does not undermine your importance as a

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		key infrastructure stakeholder. Affinity Water's presence at the Southwest Hertfordshire Infrastructure Provider Meeting for Utilities on 13th March 2019 was noted and welcomed. We wish to continue to engage with you and the wider water industry through the Duty to Co-operate process in identifying our housing strategy and preferred allocations as we prepare our Local Plan. We welcome and acknowledge recent discussions with you under that process.
	Our Response	We welcome your wish to engage going forward and are eager to do this.
	Summary of any change to our final WRMP	N/A
1.7	Representation	<p>Our Issues and Options paper identified three broad ranges of housing provision per year. Since that paper, it is clear from the standard methodology that there is a need for the new Local Plan to accommodate provision in the upper tier of 1025 houses per annum (a substantial increase over the current Local Plan of 430 homes per annum). This would equate to 18,450 homes across the 2018-2036 Local Plan Period. We will need to assess how much growth the Borough can accommodate, and the capacity of infrastructure to absorb this will be a key factor we need to take into account. At present, adoption of the new Local Plan is set to be late 2020/early 2021, although this may be subject to review.</p> <p>This Council and other local authorities, for which Affinity Water is the water undertaker, are having to accommodate higher housing trajectories and their potential cumulative need to be carefully considered, both by the local authorities concerned and infrastructure providers generally. The impact of growth proposed beyond our immediate area may also require consideration by water companies upon capacity and resilience within the water supply infrastructure, such as the proposed Oxford to Cambridge arc. Primarily, we would wish to be assured that there is capacity to meet those challenges.</p>
	Our Response	<p>We have followed required best practice and planned for growth as per Local Authority plans. Where we have made adjustments due to differences in baseline population and properties and the management of blocks of flats in the forecast, we have clarified this in our plan and technical reports.</p> <p>We recognise that high growth is only within the draft GLA plan, so this is not included in the forecast of baseline demand. Our fWRMP19 addresses GLA growth through inclusion of a "high-growth" scenario in our sensitivity testing. In the event of a "high-growth" scenario being realised we will rely on some of the less environmentally-damaging drought permits and will accelerate delivery of our first supply option to 2032. We would need a second strategic option by 2042 and a third strategic option within the 2080 time horizon.</p> <p>Additional growth from the CaMkOx development corridor has not been explicitly included as no planning figures are available at the moment but we will continue to review our forecasts as new information becomes available as reflected in our adaptive plan.</p>
	Summary of any change to our final WRMP	Our fWRMP19 addresses GLA growth through inclusion of a "high-growth" scenario in our sensitivity testing.
1.8	Representation	We note that the Strategic Options Map on page 65 of the WRMP indicates a "Boxted New Water Treatment Works" in connection with the Grand Union Canal transfer option and we would welcome further information regarding the proposed treatment works, including potential locations. Table 24 on page 104 of the WRMP suggests scoping work will commence post 2023 and it may therefore fall within the period of our emerging new Local Plan.
	Our Response	We will be happy to provide further information when available.
	Summary of any change to our final WRMP	N/A

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1.9	Representation	You may be aware that local authorities in the South West Hertfordshire area are preparing a Joint Strategic Plan and we would encourage Affinity Water to engage with that process.
	Our Response	We welcome your wish to engage going forward and are eager to do this.
	Summary of any change to our final WRMP	N/A
1.10	Representation	It is crucial that Affinity Water continue to work closely and regularly engage with us, other local authorities, neighbouring water companies and third parties in order to deliver appropriate, sustainable and community-focused solutions to water supply in Dacorum and South West Hertfordshire. We would like to be consulted on the infrastructure improvements affecting Dacorum river catchments identified in the 'Supply 2040' scheme, potential site allocations for new infrastructure early in the planning process and the future revisions to the WRMP.
	Our Response	We welcome your wish to engage going forward and are eager to do this.
	Summary of any change to our final WRMP	N/A
1.11	Representation	We will seek to keep you fully up to date as we make progress with establishing our future housing supply position and we look forward to continuing dialogue into the future.
	Our Response	We welcome your wish to engage going forward and are eager to do this.
	Summary of any change to our final WRMP	N/A