



**The Consumer Council for Water's
response to
National Infrastructure Commission's Call
for Evidence on the Future of Regulation**

April 2019

1 Introduction

- 1.1 The Consumer Council for Water (CCWater) is the statutory consumer organisation representing water and sewerage consumers in England and Wales. CCWater has four regional committees in England and a committee for Wales.
- 1.2 We welcome the opportunity to comment on your Call for Evidence. This document sets out CCWater's response to the questions you have posed.
- 1.3 We welcome the chance to contribute to your Call for Evidence and hope it will provide opportunities to improve the services consumers now and in the future receive.
- 1.4 This response focuses on our knowledge of the water and sewerage sector in England and Wales, and the consumers of that sector.

2.1 Future changes

2.1.1 *Where has the economic regulation of water, energy or telecoms systematically failed or succeeded to:* a. **facilitate future investment needs;**

Since privatisation, there has been £126 billion of capital investment in water and wastewater services and environmental improvements and key metrics, (for example on the number of water supply interruptions, river and beach water quality compliance and the number of sewer flooding incidents) have improved significantly. This investment has benefited current consumers and will benefit consumers in the future.

So economic regulation has been effective in funding future investment in the water sector, although Ofwat has been somewhat generous to the water companies, which we describe later in this document. It is also not clear that the regulatory process is equipped to deliver nationwide or multi company long-term investments that will deliver sufficient resilience for future consumers. The recent announcement by Ofwat of the Regulators' Alliance for Progressing Infrastructure Development (RAPID), is an important step forward in recognising and responding to the issue in water. Whether this approach can sufficiently detach itself from the company-specific price review process and respond to national resilience issues is unproven at this point.

2.1.2 **b) Promote competition and innovation;**

Promote Competition

Retail competition was introduced for non-household (NHH) customers in the water sector in 2017. We felt it was appropriate for retail competition to focus on NHH customers, as business customers desire for competition was much higher than household customers.

In terms of judging 'systematic' success or failure of the retail market, it is early days. Overall the water retail market seems to be working better for the larger business customer than the smaller NHH customer.

SME engagement

- There are currently low switching rates, particularly amongst micro, and small, medium sized businesses (SMEs).¹
- Medium-sized businesses are around twice as likely as micro businesses to have looked for market information, switched or negotiated a better deal.

Awareness of the retail market in water

- Our latest survey published in March 2019¹ showed a low awareness of the retail water market and a lack of information on switching options is continuing to prevent many businesses from shopping around for a better deal.
- Our surveys have shown that larger consumers have a greater awareness of the chance to switch and taking the chance to switch or re-negotiate with their current retailer.²

Complaints about some retailers (and wholesalers)³

- Complaints about some retailers or wholesalers to CCWater by NHH customers increased after the opening of the retail water market, and remain at a high level⁴ by the end of December 2018. For example, in the third quarter of 2018-19, CCWater received 495% more complaints from NHH customers than in the third quarter of 2016-17, just before the market opened.
- Nearly 88% of NHH complaints to CCWater are from micro or small businesses.
- Data issues and retailer/wholesaler interactions⁵ were issues in the first year and we are continuing to review progress during 2018-19 and address issues when they arise.

The new appointments and variations (NAVs) competitive approach has been operating for substantially longer. In many cases (particularly the more recent development sites), the end consumer does not have a choice; effectively one monopoly replaced another. The developer gets a choice. There were eleven NAV appointments from 1997 to the end of 2007 (mainly commercial large users) and then there were 60 appointments from 2008 to the end of 2017 (vast majority development sites). And, since 2017, there have been 28 appointments.

¹ CCWater research: Small and medium-sized businesses awareness of the water retail market. <https://www.cewater.org.uk/blog/2019/03/12/small-businesses-being-left-behind-by-water-market/>

² CCWater research: Customers' experiences of the retail water market in England <https://www.cewater.org.uk/research/customers-experiences-of-the-retail-water-market-in-england/>

³ CCWater Retail Market Performance information. <https://www.cewater.org.uk/businesses/retail-performance/>

⁴ CCWater blog: retailers still failing to turn the tide of business complaints <https://www.cewater.org.uk/blog/2019/02/26/retailers-still-failing-to-turn-tide-of-business-complaints/>

⁵ CCWater non-household complaints report 2017-18. <https://www.cewater.org.uk/wp-content/uploads/2018/07/Non-household-complaints-report.pdf>

Competition beyond retail

Markets may be considered as a way to deliver future investments to improve availability of water resources, flooding and the impact on the environment. This may be appropriate. However, the use of markets to deliver large scale, long life assets needs to ensure that:

- Uncertainty over long term returns does not deter vital investment, as has occurred in other sectors such as energy.
- Pricing for water remains averaged across regions or, if local pricing is introduced, the societal or customer impact of this is understood and mitigated.

Promote innovation

Ofwat has recognised the need to promote and encourage innovation in the water sector. It has set the expectation that water companies should innovate to address challenges around affordability and resilience. Water companies have also been actively encouraged to collaborate with others and through partnerships bring in new skills and ideas.

It is too early to say whether the increased focus on innovation at 2019 price review has been successful or not. However, we have seen in past price reviews that when the regulator encourages innovation, it is taken forward by water companies. An example of this is the area of catchment management, which was trialled by some companies in 2009 as a way of dealing with compliance issues, rather than investing in treatment (prevention rather than cure). This approach is now 'business as usual' for a lot of water companies.

We believe that comparative measures used in the water sector can lead to innovation as companies strive to drive up performance. However, the increasingly competitive nature of committing to upper quartile performance at regulatory price reviews can result in companies being less willing to share innovation / good practice.

There are a number of barriers to innovation perceived by companies. These include fear of failure (missing regulatory targets) and the lack of a bespoke pot of customers' money to fund innovation. However, it is our view that neither of these should act as a fundamental blocker to innovation.

2.1.3 c) meets the needs of both current and future consumers;

Current consumers

We believe that water regulation is only partly meeting the needs of current consumers. While current household customer satisfaction with the service is high⁶ (over 90% for water), there is a gap between that and customers perception of the value for money they get from the service (around 72%); and customers view on the fairness of their charge is only 61%. We believe that this 'gap' on value for money and fairness is a key driver of the legitimacy issues about the current industry.

⁶ CCWater research annual household tracker - Water Matters. <https://www.ccwater.org.uk/research/water-matters-household-customers-views-of-their-water-and-sewerage-services-2017/>

This is also reflected in the scale of billing complaints received by the industry and CCWater. Consistently over the past years, the biggest category of complaint we receive from household and non-household consumers is about disputed metered bills. There is little regulatory focus on disputed water metered bills.

Some current consumers also experience service failure, such as the disruption that some consumers have if their home or garden is flooded with sewage or, during the large scale water supply interruptions following the ‘Beast from the East’ in March 2018.⁷ However, service failures are not the areas where we get the greatest numbers of complaints from.

Future consumers

We describe in our response to (a) the significant amount of capital investment since privatisation. This investment will benefit future consumers, but as we described earlier, there is a question about the ability of the regulatory process to sufficiently look ahead and factor in long-term investments that will deliver sufficient resilience for future consumers. The recent announcement by Ofwat of the Regulators’ Alliance for Progressing Infrastructure Development (RAPID), is an important step forward in recognising and responding to the issue in water, but whether this will fully address company centric nature of current regulation and give a national viewpoint as yet untested.

2.1.4 What do you see as the most important improvements that could be made to the UK’s system of economic regulation?

- In water the regulatory system is weighted in favour of companies and investors to some extent. Although there is ‘symmetry’ in that Ofwat has two equal primary duties of protecting consumers and ensuring water companies can finance their functions, there is asymmetry in the appeal process where only companies - not customers - have the right to appeal Ofwat’s decisions.
- That creates an imbalance in favour of companies and is inconsistent with the regulation of other sectors, including energy, where customers already have the right to appeal.
- Giving water customers or their representative, CCWater, the same appeal powers would help to address this imbalance between companies and customers and provide greater uniformity across these regulated sectors.
- Being able to appeal would help to reduce the risk of consumers falling foul of regulatory decisions that are more favourable to companies that can damage the legitimacy of the industry. For example, Ofwat’s historic over-generosity to companies at previous price reviews, (evidenced by examining companies annualised returns since 1989), may have been averted had CCWater had the right to make its case to the Competition and Markets Authority (CMA).
- It could also play a part in shifting water consumers’ perceptions of the fairness of their bills, which have remained static at 61% since CCWater began tracking consumers’ views in 2006.
- Alternatively, Ofwat duties could be weighted more favourably towards the consumer.

⁷ CCWater research Customers’ experiences of water supply interruptions following the ‘Beast from the East’ in March 2018. <https://www.cwater.org.uk/research/customers-experiences-of-water-supply-interruptions-following-the-freeze-thaw-events-of-march-2018/>

2.1.5 The National Infrastructure Assessment outlined a number of changes and challenges in infrastructure to 2050 (e.g. the move to fibre in telecoms, decarbonisation in energy and the need for long term resilience in the water sector). How might the scope, functions or activities of economic regulators need to adapt in light of future challenges?

We are concerned about the ability of the industry regulator as currently configured, to sufficiently deliver on long term resilience in the water sector.

There is likely to be a need for inter company, cross regional or national solutions (pipelines, reservoirs and other solutions) to water resource issues in future (as identified by NIC amongst others). This is an important requirement for the industry for the continuation of a safe reliable service to customers, and the need for progress is becoming urgent. This is not necessarily straightforward for the current regulatory system in terms of:

- The funding and phasing of these schemes when they cross company boundaries and involve multi price review periods.
- Which customers pay for these, when and how to get valid customer engagement in these questions.
- Who procures, finances, operates and regulates these schemes.

Ofwat has set up RAPID, but a systems operator model has also been suggested as a solution, but the above questions should still need to be resolved in either case.

Adapting scope, functions or activities in light of future challenges

- If the Government wanted more certainty that its objectives on cross-sector issues, such as bill impact and affordability, were being delivered in a consistent way it could specify cross-sector national objectives that it required the economic regulators to deliver on.
- The Government could further satisfy itself that regulators had the appropriate motivation to work together on these issues by requiring the regulators to report to it on their progress towards meeting the Government's objectives. This potentially could involve some shared metrics for the regulators to work towards.
- There could also be further scrutiny if a relevant Parliamentary committee periodically reviewed how consistent the regulators were being in their approach to cross-sector issues that the Government wanted a consistent approach on.

2.1.6 How might the increasing availability of data impact regulation in future? Can data increase the pace at which regulation responds to change, enabling innovation?

The greater availability and use of data in future could make a significant positive contribution to regulation and the sector. The water sector could make better or more informed investment decisions based on better use of data on asset health and performance, and the use of AI. This could improve decisions in terms of assessments it makes on the need for pipe or sewer renewal rates, and aid water companies to increase operational efficiency. It could also improve environmental management, as data can be shared with environmental regulators if wastewater

discharge or abstraction consents are likely to be breached, allowing more immediate responses.

2.2 Competition and innovation

2.2.1 How have the energy, water and telecoms sectors performed with respect to efficiency, since privatisation?

The water industry has made substantial efficiency gains since privatisation. In 2011, Ofwat estimated that, due to its efficiency challenges, customers' average bills were £110 lower than they would otherwise have been.⁸

We welcome efficiencies where they are driven by true changes in the way the outcome to a problem is approached; the way an asset is built, or designed, or a new approach which enhances productivity and results in delivering an outcome at a lower cost.

Our concerns are that the search for efficiency by the Regulator and regulated companies jeopardises asset maintenance or investment in issues customers value and/or the environment.

Our analysis of water companies' 2020-25 business plans shows that 14 out of 17 water companies propose a reduction in maintenance spending as a percentage of their overall proposed total expenditure, compared to the previous price control period (2015-20). These cost proposals are currently subject to Ofwat challenge, and could indicate that some companies are becoming more efficient in maintenance. However, it does raise concerns that companies may be less ambitious than they need to be (to deliver future resilience), in order to appear more efficient. We want to see the price review process ensure companies deliver challenging performance targets relating to the maintenance of their assets, without storing up problems for the future.

2.2.2 How has competition impacted on investment, innovation and outcomes for consumers across energy, water and telecoms since privatisation?

As mentioned in our response to 2.1.2 (b), New appointees (NAVs) are alternative monopolies which have been in operation since about 1997. There have been some inputs and innovation from some NAV operators, but from others it has been limited.

Investment and Innovation

The NHH retail water market opened in April 2017, so it is fairly early days for competition in the water sector. However, it is difficult at this point to see how competition has impacted positively or negatively in any significant way on investment, innovation or outcomes. We describe outcomes for consumers more in our answer to 2.1.1(b).

⁸ Defra Review of Ofwat and consumer representation in the water sector, July 2011 Pg 63
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69442/ofwat-review-2011.pdf

2.2.3 How has regulation affected the level of innovation in energy, water and telecoms, compared to these utilities in other countries and/or other comparable industries?

We think there is room for more innovation, and regulation needs to facilitate, promote and incentivise this more. The Institute of Customer Service's quarterly survey⁹ shows the energy and water customer satisfaction score is lower by about 4 percentage points compared to the all-sector average. In water, to date, there has only been limited segmentation of consumers, and a move towards e-business has been slow compared to other utilities and retail. The water sector has been slower to implement initiatives such as:

- allowing customers to access bills online
- segmented approaches to communication and data to differentiate between groups with different needs
- introducing web chat, and social media contact channels

We talk about the use of comparative measures used in the water sector to drive up innovation at 2.1.1 (b).

We also believe that a large regulatory incentive based on consumers' views could help further drive innovation, particularly in terms of delivering outcomes that satisfy consumers. Ofwat's proposal to introduce C-MeX (Customer Experience Performance Commitment) should be a positive step forward. This is a mechanism which incentivises water companies to provide an excellent customer experience for residential customers. It is our view that strengthening this incentive further would increase the focus on delivering for consumers, which could help to drive innovation in the most important areas. By aiming to mimic what competition does in more competitive sectors, this incentive could force companies to reflect on the different needs and expectations of residential customers and to better segment their customer base.

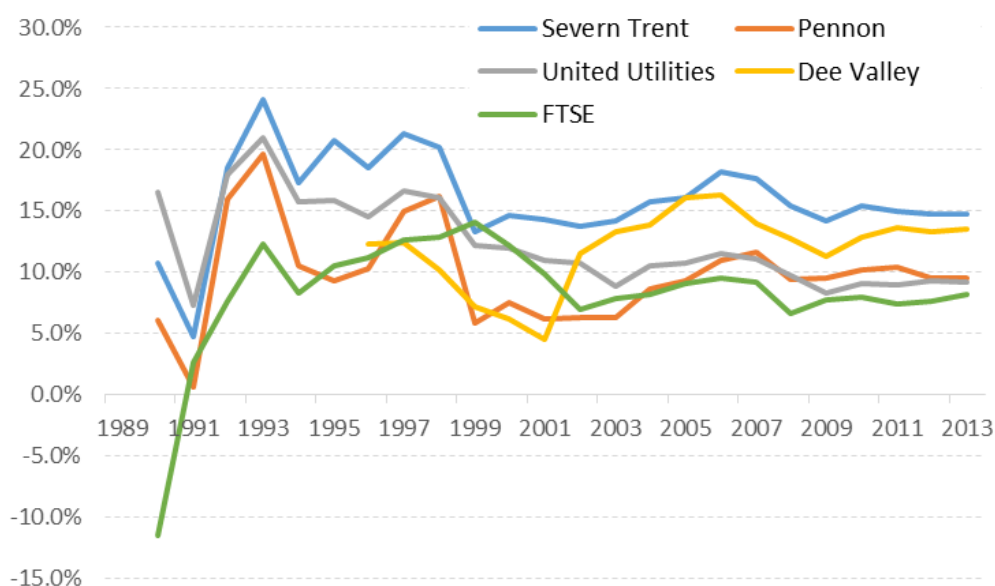
2.2.4 When has regulation been too slow to adapt to changing market circumstances and what have been the consequences for consumers and investors?

We believe the water regulator was too slow to adapt and acknowledge the evidence that its determinations on financing issues were over-generous and led to higher bills for water customers, and allowed a much higher gearing across most of the sector. The effect was water companies made returns in excess of what the market expected and customers' paid higher bills over successive price reviews. We believe this has in part contributed to the legitimacy problem affecting the water sector.

As an indication of this generosity, our report by ECA shows that (the remaining quoted) water companies have consistently outperformed the level of returns in the FTSE since privatisation, despite the lower level of risk for water companies.

⁹ Institute of Customer Service survey January 2019 <https://www.instituteofcustomerservice.com/research-insight/research-library/ukcsi-the-state-of-customer-satisfaction-in-the-uk-january-2019>

Annualised returns over periods starting in 1989



The NAO also noted the windfall gains made by water companies in their 2015 report ‘*The economic regulation of the water sector*’¹⁰.

“Ofwat’s 2014 price review committed companies to improving services further over the next five years while cutting customer bills, increasing value for money for consumers. Customers, however, have not seen enough of the benefits of companies’ unexpected financial gains from factors such as falls in corporation tax rates. Ofwat made significant improvements in 2014, but its price cap regime is not yet achieving the value for money that it should.”

2.2 Regulatory consistency

2.3.1 Where could regulators work together more consistently to meet future challenges, achieve efficiencies within the regulatory system or to promote better outcomes for consumers, investors or society?

Working together more consistently

We believe there are some key areas that economic regulators should be collaborating on to improve outcomes for consumers and reduce detriment. These are:

Phasing infrastructure spend

One of the challenges identified by the NIC is the need for investment across the range of infrastructure sectors. The delivery of this will need to be phased if there is not to be spikes in customers’ bills across these sectors. Government plays the primary role in this, but regulators have a role to consider the bill impact of investment in other sectors too. Otherwise, this could generate customer acceptability problems and increase affordability issues. A look across the investment needs of the sectors could allow better pacing of large-scale

¹⁰ <https://www.nao.org.uk/report/the-economic-regulation-of-the-water-sector/>

infrastructure, particularly in response to climate change challenges that affect several sectors.

Affordability help

To work together to share an understanding of affordability interventions and what is working rather than pursuing consistency for its own sake. This is to ensure that measures and solutions are developed that best meet the needs of water, energy or telecoms customers. The work could lead to some consistent approaches, but only where the process has identified solutions that would be universally beneficial.

Sharing ideas on consumers in vulnerable circumstances

- To continue the work on considering how consumers in vulnerable circumstances can be helped. The Consumer Forum set up by BEIS already has consumers in vulnerable circumstances as a focus; and the UK Regulators Network (UKRN) also considers the issue.
- It could be that the UKRN is given a collective responsibility to deliver on specific objectives, which the individual regulators need to act on.
- The regulator could consider how to engage the relevant companies in identifying and making contact with consumers who are temporarily vulnerable (transient vulnerable) during a time-limited event, such as a water supply interruption. Our consumer research¹¹ following water supply interruptions after the 'Beast from the East' cold snap and rapid thaw identified this transient tranche of consumers, who wouldn't normally appear on a register for help.

Financing Data and the Cost of Capital

There may be opportunity for regulators to share expertise or consultant material on utility financing and market analysis.

Other regulators

Looking beyond the economic regulators, the regulators in the water sector could coordinate better to improve the timing of key environmental, or drinking water quality improvements to pace more smoothly when investment happens, so consumers don't experience sharp increases in bills. Ofwat's Regulators Alliance with the Environment Agency and the Drinking Water Inspectorate to consider national water resources issues is an encouraging first step towards a national perspective on resilience planning.

2.3.2 What changes to the existing regulatory framework would be necessary to promote greater collaboration and regulatory consistency? Are there functions that might better be provided on a multi-utility basis without the need for wider organisational change?

Changes to the existing regulatory framework

As we say in 2.1.4, there are three changes to the existing regulatory framework that the Government may want to consider on cross-sector national objectives; the

¹¹ Customers' experiences of water supply interruptions following the 'Beast from the East' in March 2018. <https://www.ccwater.org.uk/research/customers-experiences-of-water-supply-interruptions-following-the-freeze-thaw-events-of-march-2018/>

need to report progress against Government objectives and cross-sector scrutiny from a relevant Parliamentary committee.

2.3.3 What is the case for or against a multi-utility regulator covering energy, digital and water?

We believe that there are pros and cons to both a multi-utility regulator and separate utility regulator, but there is not a definitive case either way. We outline the pros and cons in the table below.

For consumers, the most important issue is the effectiveness, rather than the size or scope of the regulator.

	Pros	Cons
Multi Utility Regulator	<ul style="list-style-type: none"> Consistency of approach for some cross utility policy areas, such as on affordability and the planning and phasing of investment. Economies of scale, through one Board and senior management team, rather than three. 	<ul style="list-style-type: none"> Risk that ineffective regulation would disadvantage consumers across many sectors. Risk of remoteness from customers of each sector and therefore lack the ability to challenge effectively within those sectors. Skills and knowledge specific to the sector maybe dilute reducing the effectiveness of the challenge to water/energy/telecoms companies on more technical aspects of the business such as tariffs; price setting and the cost of capital; and financial outperformance. Lose ability to compare and learn from different approaches and new ideas of sector regulators.
Separate Utility Regulators	<ul style="list-style-type: none"> Specific knowledge of sector should provide more effective challenge. Ability to compare and learn from different approaches to regulatory decision making, consumer perspectives and financing. <p>For example, the 2019 Price Review, PwC working for Ofwat compared their conclusions to Ofgem’s from 2014¹². Ofgem cites Ofwat’s view in its methodology in 2014 review.¹³ In 2013 the Joint Regulators’ Group jointly considered “the approach taken by each</p>	<ul style="list-style-type: none"> Costs may be greater than a multi utility regulator, due to more Board members, and senior team. Inconsistent approach, towards priority for climate change investment or consumers in vulnerable circumstances (although there could be good reasons for some variance in approach).

¹² <https://www.ofwat.gov.uk/wp-content/uploads/2017/12/PwC-Updated-analysis-on-cost-of-equity-for-PR19-Dec-2017.pdf> (section 3.2)

¹³

https://www.ofgem.gov.uk/sites/default/files/docs/2014/02/decision_on_equity_market_return_methodology_0.pdf (section 1.7)

	<p>regulator in relation to financing duties, the setting of the cost of capital in price controls, assessing financeability and the ring-fencing provisions in each regulatory sector”¹⁴ We are also aware that Ofgem is building on the water sector’s customer challenge group concept.</p> <p>There are areas which regulators could usefully work together on, which we list in answer 2.3.1, separate regulators would allow learning and development of approaches via a compare and contrast approach.</p>	
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2.3 Policy and regulation

2.4.1 Is the traditional role of economic regulation, to mimic the outcome of a competitive market, sufficient to ensure future investment and to meet the needs of current and future consumers, and if not, how might this role need to change?

The use of comparative competition is still valid and an effective tool to encourage water companies to improve performance. However, there are significant national challenges on water resource and wastewater issues, caused by climate change and population growth, where regulation needs to ensure long term and in some cases national or regional infrastructure.

There is likely to be a need for inter company, cross regional or national solutions (pipelines, reservoirs and other solutions) to water resource issues in future (as identified by NIC amongst others). This is an important requirement for the industry to ensure the continuation of a safe reliable service to customers, and the need for progress is becoming urgent. This is not necessarily straightforward for the current regulatory system in terms of:

- The funding and phasing of these schemes when they cross company boundaries and involve multi price review periods.
- Which customers pay for these, when and how to get valid customer engagement in these questions.
- Who procures, finances, operates and regulates these schemes.

Yet these are questions that will need answers for water consumers to have confidence that their water and wastewater supplies are resilient into the future.

2.4.2 What should be the boundary between government setting policy and strategic direction and independent regulation in these sectors? Do the existing duties and functions of regulators need to be adjusted to reflect this?

The Government should specify its strategic policy objectives in its social policy guidance, and regulators should deliver on them, with the Government making the boundaries clear. The Government should:

¹⁴ <https://www.ofgem.gov.uk/ofgem-publications/37070/jrg-report-cost-capital-and-financeability-final-march-2013-pdf>

- set the requirements for each sector in terms of its social obligations and national/regional objectives and priorities and phasing of improvements.
- say how it will assess the effectiveness of investment in the regulated market.

Government plays an important role in being clear on priorities and timing across the infrastructure sectors, that will affect the phasing of investment in the separate sectors. It should take into account consumers' bills to make sure they are acceptable and affordable, especially where there are nationally important issues, such as ensuring there is water resilience in the future.

To ensure delivery of Government policy, regulators should be required to report to the Government on their progress towards meeting the strategic policy objectives.

2.3.3 Has there been a lack of clarity over strategic goals? What is the cause of this and what has been the impact on investment?

Within the water sector, there has been a lack of clarity over the Government's view on the prioritisation and pacing of improvements, except where specific legislative deadlines exist, such as the Urban Waste Water Treatment Directive. The impact on investment has been that, at times, some customer priorities may have been squeezed or prices have increased sharply, causing customers to find their bills unaffordable or unacceptable.

There has also been a lack of clarity over the planning process and how this will ensure national or intercompany investment to deliver future water resource needs.

2.3.4 Are the government's principles for economic regulation* - accountability, focus, predictability, coherence, adaptability and efficiency - fit for purpose; and if not, how should they change?

We believe that the need to deliver outcomes that consumers find acceptable and satisfactory is what ultimately matters, in order to avoid legitimacy problems in the sector.

The addition of 'transparency' would fit with assessing how regulators have delivered for consumers. This could be achieved by requiring the regulators to report to Parliament on the progress they have made with achieving the government's priorities for their sector.

The National Audit Office (NAO) recently conducted a study on how well regulators in utilities, communications and financial services markets have delivered for consumers. The NAO concluded that the regulators could be more transparent in what they deliver for consumers¹⁵.

2.3.5 How can regulators act in the future to support public trust in the regulatory system for water, energy and telecoms?

¹⁵ See paragraph 6 (summary) in 'Regulating to protect consumers in utilities, communications and financial services markets' (National Audit Office, March 2019)

Consumers expect regulators to be effective, tough, have teeth and deal with the wrongdoers, via enforcement action, as well as looking into the future to ensure there is a resilience and reliable service.

Our research¹⁶ with customers suggests that consumers' perceptions of value for money and the fairness of their charges, rather than trust, are the causes of the legitimacy issue. Ofwat should focus on improving these metrics.

We believe regulators should also:

- Be transparent about their activity and decision making process;
- Avoid generosity in their cost of capital decisions and monitor the sectors' financial performance and compare it against other markets;
- Measure and report on how well they have achieved their measures, as per the NAO's recommendations from its recent study (see 2.3.4 above).

Queries on this response should be directed to Jenny Suggate Jennifer.suggate@ccwater.org.uk or Steve Hobbs steven.hobbs@ccwater.org.uk

¹⁶ <https://www.ccwater.org.uk/wp-content/uploads/2018/07/Water-Matters-Highlights-Report-2017.pdf>