

# Comments on the Integrated Water Management Study and Report.

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14 January 2009

**PUSH, its professional consultants and officers have had many months to assess and reach conclusions on how to present these facts and opinions in a way that is favourable to the PUSH overriding objective to deliver housing. Citizens without access to the full background, facts and expertise have just a few days.**

The Report is well researched and presented and perfectly understandable by non water industry experts. We welcome the recommendation to make it available.

The Study Brief did not appear to encourage challenge to the basic assumptions of the PUSH housing allocations even though the Sustainability Appraisal of the South East Plan provided an opportunity to do so.

Report conclusions appear to emphasise the “optimistic” and may not be as objective as citizens would like, given the apparent pressure for a “yes” answer. For example, has insufficient weight been assigned to the following concerns expressed by the Atkins report?

- Area designation as “Seriously Water Stressed” – EA and DEFRA
- Difficulties of delivering options and demonstrating sustainability should not be underestimated
- The complexity of a number of the issues involved have yet to be fully explored
- Uncertainties are considerable
- No “environmental capacity” left in the receiving waters for the consented loads of pollutants to be increased
- There are serious information and management gaps
- Potential impacts of the WFD poorly understood
- Environmental protection a key constraint ... concerns that the sub-region has already reached its environmental capacity
- Water management and planning – lack of coordination and cooperation
- Introduction of new, unapproved forecast methodology to get more optimistic results – using standard methodologies “ the concerns are warranted over 50% of WWTW likely to exceed flow consents”
- Question caution in target headroom of PWC
- Water company customers will ultimately pay...
- WFD- high level of uncertainty as to what the EQS will be...
- “Peel Common works, which will take the major share of the wastewater from new households is of greatest concern in terms of

capacity and also has the least robust flow monitoring data... in 3-4 years time a much more robust reassessment of current discharges and future capacity can be undertaken”

- Treatment technology improvements may not be sustainable due to increased energy use
- Further tightening of consents may be considered