23 March 2012

Lee Dance
Water Resources
South East Water
Rocfort Road
Snodland
Kent ME6 5AH

Dear Mr Dance

The UK's landscape and gardening industry is extremely concerned about the damaging effects of the forthcoming hosepipe bans on our sector. Our total industry contribution to the UK economy is £9 billion per annum, providing nearly 300,000 jobs. The landscape/amenity sector alone accounts for 177,000 jobs in 17,870 businesses across the UK. The proposed temporary use bans risk damaging the complete supply chain, from primary producer to professional gardener, and many other related businesses. The various trade and professional bodies in this sector are united on this issue, and we therefore welcome the opportunity to make this joint industry (AnnexA) response on South East Water's plans to introduce water restrictions from 05 April.

As 2006 demonstrated, temporary use (hosepipe) bans are extremely damaging to the garden and landscape industry. We have therefore worked hard since 2006 for a more proportionate response in times of water shortage. The industry promotes water-efficient gardening at all times, and has responded to the current drought by promoting water saving tips to consumers and the industry. The HTA which represents the entire garden supply chain is also working with Thames Water to promote longer-term behavioural change towards water efficiency in the garden, with plans to mobilise 2,500 garden centre members to communicate this message to the gardening public.

In this spirit, we welcome the announcement that South East Water will provide an exemption for drip irrigation during the forthcoming temporary use ban. This will help achieve the desired water savings whilst allowing South East Water's customers to continue gardening. It should also help longer term water savings by promoting water-efficient equipment.

However, we are also strongly urging all water companies to provide essential protection for the professional landscape industry where the use of a hosepipe is of critical importance. Newly laid turf and plants require a certain amount of water to survive, whether it is delivered through a hosepipe or via a watering can. Preventing landscapers from using a hosepipe will merely add time and cost to their business thereby making them commercially unviable. For a low-margin industry that is already fragile in the wake of the economic downturn, the hosepipe ban could have disastrous consequences. We are already receiving reports of cancelled or delayed contracts and the prospect of bankruptcy and significant job losses is unfortunately very real. The potential impacts of a ban are spelt out in more detail in Annex B.

We note that several water companies intend to provide a concession for businesses that use a hosepipe for washing private motor vehicles, or walls and windows of domestic premises. We would argue strongly that the landscape industry should qualify under the same criteria and we are asking all water companies to provide the following concessions:

- **using a hosepipe to water a garden or plants where this is done as a service to customers in the course of a business**;

- **the watering-in of newly laid turf <u>and plants</u> for the first 28 days (we note your welcome concession for turf).**

We trust that South East Water will consider these suggestions in the spirit of the UKWIR Code of Practice No 11/WR/33/3. This Code specifically identifies the potential commercial impact on landscape firms in the same way that it does for car wash and window cleaning businesses, and it encourages water companies to apply exemptions and concessions in an equitable and consistent manner.

The landscape industry already takes a responsible approach to watering. Nevertheless, our respective associations stand ready to disseminate and promote an industry code of practice to all members to reinforce this message – Annex C. Our professional suppliers, designers and landscapers all have an important role to play in embedding long term behavioural change on the importance of water efficiency in the wider population. They can only do so if they are able to operate their respective businesses.

The concessions that we propose will help minimise the potential damage to UK GDP, at a time when the Coalition is doing all that it can to stimulate economic growth. They would also be consistent with Defra/EA/UKWIR guidance that the water industry works with all stakeholders to ensure a proportionate response at times of water shortage.

Regards

Carol Paris President HTA	Alistair McCapra Chief Executive Landscape Institute	Mark Gregory Chairman APL	Paul Cowell Chairman BALI
Charles Rutherfoord Chairman Society of Garden Designers	Tim Mudge Chief Executive Turfgrass Growers Association	Dr Roger Williams Head of Science RHS	

cc:
Rt Hon Caroline Spelman MP, Secretary of State, Defra
Rt Hon George Osborne MP, Chancellor of the Exchequer
Mark Prisk MP, Minister of State, BIS
Baroness Fookes, Chairman, All Party Parliamentary Group for Gardening and Horticulture
Dr Paul Leinster, Chief Executive, Environment Agency
Pamela Taylor, Chief Executive, Water UK

Annex A

The Horticultural Trades Association (HTA)

The HTA is the voice of the gardening and horticultural industry. We have 1,600 grower, retailer and landscaper members, with approximately 2,500 retail garden centres across the UK. The industry is worth £9bn per annum and provides nearly 300,000 jobs in serving the domestic market of 20 million gardeners.

The Association of Professional Landscapers (APL)

The APL was founded in 1995 as a specialist national group within the Horticultural Trades Association. APL members adhere to a strict Customer Charter and the scheme is accredited to Trustmark, the Government endorsed initiative promoting professional trades people to consumers.

British Association of Landscape Industries (BALI)

BALI's Membership stands at 700 with a combined member turnover in excess of £1.5bn employing around 25,000 people. This does not take account of seasonal workers.

Turfgrass Growers Association (TGA)

The Turfgrass Growers Association (TGA) is a national association of companies involved in turf production and affiliated industries such as machinery manufacturers and seed companies. It also includes stockists and distributors of turf. The industry sells around 12,000 hectares of turf per year and which is worth £360m to the UK economy.

Society for Garden Design (SGD)

The SGD has membership of 1150 Garden Designers and Design and Build Companies.

The Landscape Institute

The Landscape Institute is the Royal Chartered body for landscape architects. As a professional organisation and educational charity, we work to protect, conserve and enhance the natural and built environment for the public benefit. We accredit university courses and promote professional development to ensure that landscape architects deliver the highest standards of practice. We work with government to improve the planning, design and management of urban and rural landscape. We champion landscape, and the landscape profession, through advocacy and support to our members, in order to inspire great places where people want to live, work and visit.

The Royal Horticultural Society (RHS)

The RHS is the UK's leading gardening charity dedicated to advancing horticulture and promoting good gardening. The RHS has 380,000 members, including 12,000 professional gardeners.

Annex B – Hosepipe ban impact on landscapers

The landscape industry

The landscape industry includes businesses in the following categories:

- Landscape contractors for both domestic gardens and commercial landscaping (indoors and outdoors)
- Maintenance contractors
- Garden designers and landscape architects
- Suppliers – hard landscaping materials and soft landscaping (plants) including turf

Thousands of businesses operate within this market and they range from a plethora of small (typically family-based) businesses up to large corporate operations.

How landscapers use water

Watering newly planted turf and plants

All newly planted plants need to be watered until they are sufficiently established that they can draw water directly from the soil. It does not matter whether these plants are drought-tolerant or not, as drought-tolerance only applies following establishment. No two landscaping projects are the same, but within a 'typical' domestic garden project landscapers are required to spend one to two hours a day watering-in plants and newly laid turf. On completion, the customer will be expected to take on the watering unless an on-going maintenance agreement has been made.

The level of watering will vary depending on the size of plants, for example, trees and hedging require more watering than low-level shrubs. Best practice for hedging is for landscapers to install a drip system immediately after planting to avoid evaporation and provide maximum water availability to the plant roots. In this manner, any excess water is absorbed by the ground or natural aquifers, unlike the run-off from car washing and window cleaning which is discharged into drains along with any pollutants.

Commercial landscaping projects are much more variable in scale and plant content but plants will again require watering-in. This may utilise standpipes or bowsers but can only practically be done with a hosepipe. Our understanding is that watering on commercial projects falls outside the scope of the temporary use ban, but there remains concern over new plantings for public sector projects (e.g. hospitals and schools).

Operating machinery

Domestic landscapers typically fill a water butt with a hosepipe and use this to operate cement mixers and other hard landscaping machinery. It is our interpretation that this is outside the scope of the ban. Water is also used, in the operation of certain types of machinery, to meet health and safety requirements and therefore we believe this also falls outside the scope of the ban.

Garden maintenance

Plants, especially those in containers, require on-going watering and for large-scale projects this can be contracted to a maintenance company who would typically use a hosepipe.

Impact of a hosepipe ban

Landscapers are already being impacted by the ban and will continue to be so in the following ways:

Inability to water plant material already planted this year

One business has told us that they have already planted £800,000 worth of plants in an area that will fall within a hosepipe ban. They provide a standard guarantee, so they will be liable if the plants die. It is not economically viable to hand-water or install a drip system so they are heading towards a large bill. A smaller but similar example is a business that has planted £73k of plants over the last three months. The company is liable if the plants fail due to lack of water, yet no insurance company is willing to provide cover for potential plant losses.

Extra cost in watering plants in new contracts

Using the domestic contract example above 1-2 hours of watering/day is worth £25-50. It could easily cost 10 times this (i.e. £250-£500/day) to do the same job using a watering can. Domestic landscape contractors are typically too small, and margins too tight, to be able to absorb this cost and the customers would be unlikely to pay. It would make small projects commercially unviable.

Another option would be to attach a hosepipe to a bowser containing non-potable water. Most domestic landscapers do not own their own bowser and would have to hire one (typically £130/week), pay for somebody to travel to fill it, allow time for the filling (1-2 hours) and ensure they have someone with driving licence permission to tow a trailer (putting someone through a test costs approximately £500-£1000). There also needs to be adequate access for a bowser at the site.

If a landscaper is unable to water plants and turf, the expected lost business is 30-50% for a typical domestic contractor. Business is already tough during a recession and many landscapers would be likely to go out of business if this were to happen.

Orders/projects cancelled

Members have already reported to us contracts that have been cancelled or delayed as a result of the hosepipe ban. One member has lost a £4,500 job to plant a laurel hedge and another has lost a £3,500 hedge order. For small businesses this is a serious hit and has taken place before the ban has even come into force. Another member has had a large planting project delayed.

Landscapers use water as efficiently as possible already. Under the terms of a hosepipe ban they would still use the same amount of water, but would need to apply it more inefficiently from a cost perspective. Fundamentally the extra costs are too high for a landscaping company to cope with and we would expect to see a number go out of business and jobs to be lost as a result.

Annex C - Water Usage Code of Conduct for Landscape Professionals

The signatory organisations to this Code of Practice recognise that our respective members already take a responsible approach to water use. It is obviously good commercial practice for landscape companies to be responsible with water at all times. However, in times of drought it is even more important to ensure that you are as water-efficient as possible. And it is equally important to encourage your clients to adopt water saving behaviour.

The signatory organisations have therefore produced the following guidance to strengthen the industry's commitment to water use. We will disseminate the information to members and ask them to promote the Code amongst their peers, and to further educate their clients about the sensible use of water.

The following practical guidance will help conserve water resources and protect the environment whilst carrying out your business.

- Check to ensure that there are no leaks in your hosepipes or fittings
- Use trigger lances or guns to ensure water efficiency
- Plant trees and shrubs in well-rotted, water-retaining compost and cover with a heavy layer of mulch (up to 4 inches) to retain moisture
- Deliver water directly to the base of plants through tree-root watering pipes or trickle irrigation equipment where possible to install
- Encourage clients to install water-efficient drip irrigation systems where appropriate
- Wherever possible, encourage clients to use timer devices to water early in the morning or late in the evening when evaporation is minimal
- Only use hosepipes with double check valves
- Advise customers not to worry about lawns turning brown. This shows the grass has stopped growing, but most lawns will recover completely when the rain returns
- Encourage clients to install water butts to collect rainwater off greenhouse, shed, garage and house roofs
- Encourage clients to adopt grey water recycling systems
- Use, and encourage your clients to use, water retaining products where appropriate