



Our final plan

# Our Drainage and Wastewater Management Plan 2025-2050



Technical Appendices  
Appendix N – You Said, We Did

May 2023



## Contents

Executive Summary.....	5
1. Introduction.....	11
2. Overview of the consultation.....	12
3. Analysis and Insight.....	19
4. Summary of the main themes raised by the consultation.....	22
5. Detailed review of sub–themes raised by the consultation and how we have addressed them.....	25
6. Responses from our regulators.....	39
7. Conclusion.....	43
Appendix A – Email advising of the public consultation.....	45
Appendix C – Public consultation questions and summarised responses.....	48
Appendix D – Customer research questions and summarised responses.....	51
Appendix E – Spread of stakeholder responses by theme.....	55
Appendix F – List of suggested solutions.....	65
Appendix G – Stakeholder view of the resilient plan.....	67
Appendix H – Feedback from, and our responses to, regulators and key stakeholders.....	68
Glossary.....	90
Navigating our DWMP.....	94

## Figures

Figure A - Our approach to consultation on our draft DWMP.....	6
Figure 0-2 How your feedback has helped shape our final plan.....	7
Figure B – How your feedback has helped shape our final plan.....	8
Figure C - Consultation feedback key themes.....	9
Figure 1–1 DWMP objectives.....	12
Figure 2–1 Geographic reach of public consultation.....	15
Figure 2–2 Geographic distribution of customer survey respondents.....	16
Figure 2–3 Socio economic, gender and age profile of customer survey respondents.....	17
Figure 2–4 Industrial sectors of non–household customer survey respondents.....	18
Figure 3–1 Overall, how acceptable is the plan for improving the wastewater system in the region and its impact on customer bills? (Customer survey question to household customers).....	19
Figure 3–2 Overall, how acceptable is the plan for improving the wastewater system in the region and its impact on customer bills? (Customer survey question to non–household customers).....	19
Figure 3–3 Do you think these targets are too ambitious or not ambitious enough for a 25–year plan? (Public consultation question).....	20
Figure 3–4 Which of the following approaches for the plan do you agree with most? (Customer survey question).....	20
Figure 3–5 On a scale of 1 to 5, how well do you believe we achieved the aim of creating a shared plan through stakeholder interaction? (Public consultation question).....	21
Figure 3–6 Ranking of targets by household customers from 1–5 in terms of which they thought was the most important to achieve.....	21



Figure 4–1 Count of stakeholder responses to common themes arising from the consultation ..... 23  
Figure 7–1 How the consultation has enabled us to enhance our fDWMP ..... 44

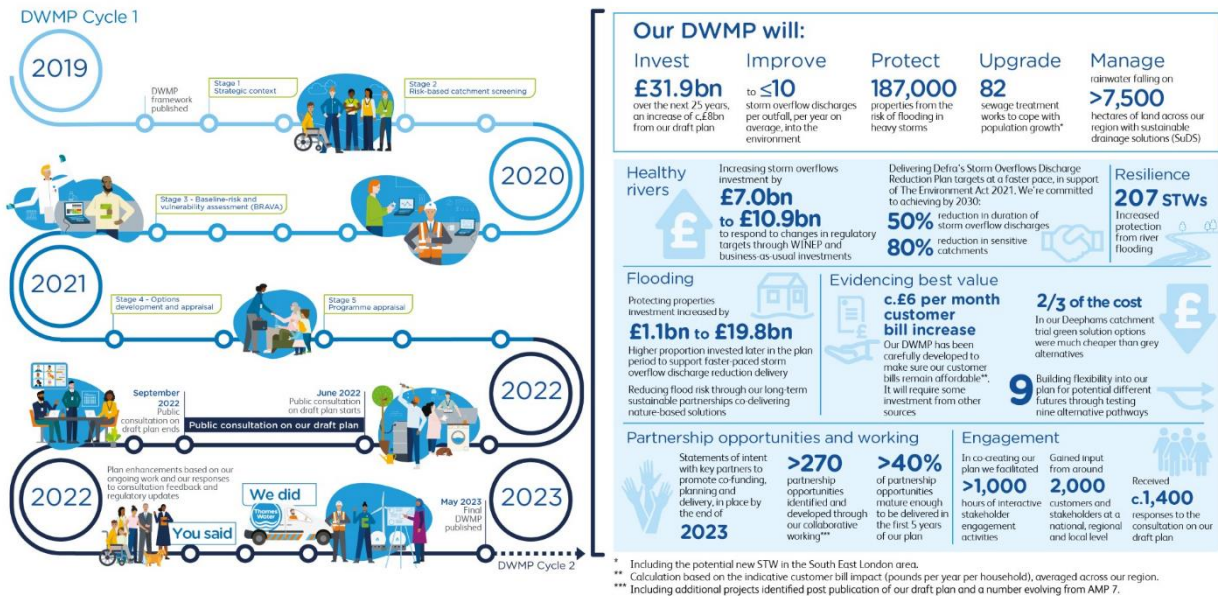
## Tables

Table 2–1 Number of responses to our public consultation ..... 14  
Table 2–2 Breakdown of respondents by stakeholder group ..... 14  
Table 2–3 The number of responses from customer research and engagement ..... 16  
Table 5–1 What you said and we did about protecting the environment ..... 29  
Table 5–2 What you said and we did about evidencing best value ..... 30  
Table –3 What you said, and we did, about delivery of our plan ..... 34  
Table 5–4 What you said and we did about our enhanced plan ..... 36  
Table 5–5 What you said, and we did, about partnership working ..... 37  
Table 5–6 What you said and we did about valuing your input ..... 38  
Table 6–1 Summary of feedback from regulators ..... 42



## Preface

We're proud to present our first Drainage and Wastewater Management Plan (DWMP) and encouraged by the level of positive feedback we've received. Over the last four years, we've engaged and worked collaboratively with around 2,000 of our customers and stakeholders, to deepen our shared understanding and develop new ways to manage drainage and wastewater across our region. We illustrate our DWMP Cycle 1 and its headlines below.



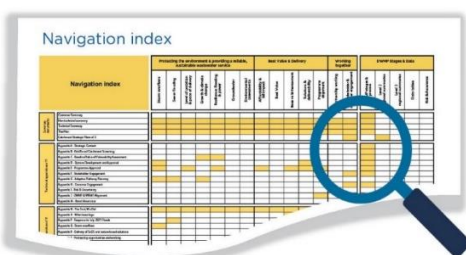
We've progressed and enhanced our DWMP since we published it for public consultation in June 2022. We were pleased to receive lots of positive comments and support on the quality and ambition of our draft plan as well as useful ideas for making our final DWMP even stronger.

We've updated our draft plan based on our ongoing DWMP work, regulatory updates and our responses to the consultation feedback wherever possible\*. Our updates include providing more detail where you felt it was needed and creating new appendices to answer technical queries. For more details on how we've progressed our final plan and responded to the consultation feedback, please see our [Non-technical summary](#) and [You said, We did Technical appendix](#).

\* Some public consultation feedback didn't require further action or wasn't relevant to the DWMP process. Other feedback was relevant to future DWMP planning cycles and will be used to inform this work.

### Navigating our documents

To help you navigate around our final DWMP document suite and find where key DWMP content features, we've placed a Navigation index at the back of this document.





## Executive Summary

Engaging with our customers and stakeholders, and addressing their feedback, has been fundamental to the development of our first Drainage and Wastewater Management Plan (DWMP), as a truly collaborative and partnership-led shared plan. This document is called '*You said, We did*', as it summarises what our customers and stakeholders *said* about our draft DWMP (dDWMP) during the formal public consultation process from 30<sup>th</sup> June – 22<sup>nd</sup> September 2022, and focuses on what we *did* in response to the feedback we received, to directly enhance our final DWMP (fDWMP), to be published in May 2023.

In co-creating the dDWMP we wanted to hear from, and collaborate with, everyone with an interest or shared responsibility for managing drainage and caring for the environment, across our region. This was a considerable challenge in an area as large as ours, that spans London, the Thames Valley & Home Counties, and includes more than 15 million customers, over 90 local authorities and a significant number of national, regional, and local organisations and environmental action groups. However, we reached and collaborated with as many stakeholders as we could throughout each stage of our dDWMP's development, using over 20 different collaborative channels, methods, and tools.

On completion of our dDWMP, we were delighted to also have the opportunity to gain customer, regulator and stakeholder feedback, through the public consultation process, which has helped us to further strengthen and finalise the DWMP for our region.

### [Our approach to consultation on our draft DWMP](#)

We took the same collaborative, far-reaching and inclusive approach to the public consultation on our dDWMP, as to its development, as illustrated in Figure A. We facilitated as much customer and stakeholder consultation feedback as we could, through using our multi-channel communications approach. This included gaining feedback through an online consultation form, interactive workshops, bespoke online sessions and meetings. We also encouraged feedback through our Thames Flood Advisors, Catchment Partnerships and across our digital channels and platforms, with information and updates across our social media feeds, website and both our DWMP Customer and Practitioner portals. In addition to this, and to ensure we gained as much customer consultation feedback as possible, we specifically commissioned third party specialists to develop and deliver a customer online survey, that was bespoke to our household and commercial customers.

# Gaining your feedback on our draft plan

## Who we consulted with

### Customers

- Household customers (domestic)
- Non-household customers (commercial)
- Vulnerable customers
- Future customers
- Older customers

### Stakeholders

- Customer Challenge Group (CCG)
- Local authorities
- National authorities
- Catchment Partnerships
- Local environmental action groups
- Land and riparian owners
- Industry practitioner groups (eg LoDEG)

### Regulators

- Consumer Council for Water (CCW)
- Environment Agency
- Natural England
- Ofwat
- Defra



## How we consulted

### Customers

- Online consultation form
- Online customer survey
- Customer portal updates
- Website updates
- Social media posts
- Dedicated DWMP mailbox

### Stakeholders

- Online consultation form
- Online workshops with local and regional stakeholders
- L1 stakeholder forums
- Thames Flood Advisors
- Catchment partnership
- Practitioner portal updates
- Newsletters
- Website updates
- Dedicated DWMP mailbox

### Regulators

- Bespoke regulator sessions
- Practitioner portal updates
- Newsletters
- Website updates
- Dedicated DWMP mailbox

## Consultation timeline



## Our consultation highlights

**>1,300** Customer online survey responses

**95** Public consultation responses

### Every Catchment Strategic Planning area

Responses from across our region, from Gloucestershire to South East London

### Every key stakeholder group

Responses from local authorities to local action groups across our region

## Positive feedback

Lots of positive and supportive responses including:

“ I really like how the information was set out in the showcards ”  
 Customer online survey responsee

“ Reading the information, followed by a question made it very easy to follow ”  
 Customer online survey responsee

“ The consultation document itself is helpful because it provided links to relevant sections of the plan and was open in the wording of the questions ”  
 Public consultation responsee



## Consultation feedback

We were delighted to receive lots of positive comments and support on the quality and ambition of our dDWMP, from the customers and stakeholders who took part in the public consultation, as well as useful challenges, ideas and suggestions for making our fDWMP even stronger. We were particularly pleased by the support we received for our proposed preferred Plan, with the majority of our customers and stakeholders agreeing with this choice, as well as supporting our proposed solution types and partnership–working approach.

We greatly appreciated the broad and diverse range of customers and stakeholders that took the time to respond to the consultation on our dDWMP, including household and commercial customers, members of parliament, regional and local government bodies, environmental organisations, local community organisations and catchment partnerships.

In total we received 95 responses to the public consultation, 1,004 responses from our household customer survey and 300 responses from our non–household (commercial) customer survey. We received the consultation feedback in a wide variety of formats from emails; letters; online meetings; to digital output from the completion of our customer survey and the consultation form we developed on our website. Overall, we were pleased that our robust consultation approach had enabled us to reach and gain responses from every one of our key stakeholder groups across every catchment strategic planning area in our region.

## Feedback analysis and insight

We've listened to, and carefully analysed, the consultation feedback we received. We were able to split it into six main themes, shown in Figure B. The figure also outlines, at a high level, what, through the consultation, our customers and stakeholders told us about the dDWMP that they supported, would challenge, had ideas about and wanted more details on.

We were able to action the majority of consultation feedback received and it was used to enhance our final plan in a number of ways, summarised on Figure B and explored in greater detail on Figure C.



# DWMP Cycle 1 public consultation



## You said

We received lots of positive comments and support on the quality and ambition of our draft DWMP as well as useful ideas and suggestions for making it even stronger, including:

### You supported

- Our preferred plan with the majority of our customers and stakeholders agreeing with this choice
- Our proposed solution types from nature-based solutions to using the latest technologies to increase capacity in our sewer system
- Our partnership-working approach with our 200+ local authorities, organisations, action groups, catchment partnerships and national stakeholders

### You challenged

- Our targets – you wanted amendments or some new ones to be added
- Our programme – you wanted quicker delivery in certain areas and were concerned about such an ambitious SuDS plan
- The cost – you were worried about the impact on customer bills

### You offered ideas for

- New or amended solutions that we could consider including in our preferred plan
- Maximising the benefits of our preferred plan's positive outcomes
- Enhancements to our stakeholder engagement approach and ongoing activities

### You wanted more details on

- The resilience of our assets to flooding and power outage
- How our plan will be funded - by business-as-usual activities (base funding) or enhancement funds
- Adaptive planning scenarios to evidence how our plan could adapt to future influencing factors such as climate change

### Feedback themes

We received around 1,400 responses from a wide range of local, regional and national stakeholder groups, it had the following six main themes:

 <b>Protecting the environment</b> <small>Level of ambition and pace of delivery</small>	 <b>Evidencing best value</b> <small>Affordability and bill impact</small>	 <b>Delivering the plan</b> <small>Solutions and deliverability of the plan</small>	 <b>Enhancing the plan</b> <small>Technical clarifications and ease of navigation</small>	 <b>Working together</b> <small>Collaboration to achieve multiple benefits</small>	 <b>Valuing your input</b> <small>Stakeholder engagement</small>
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## We did

We've used as much of your feedback as we could, together with the progress from our ongoing DWMP work and our responses to regulatory updates, to enhance our final plan including in the following ways:

 <b>More ambitious storm overflow target delivery to help protect the environment</b>	 <b>Increased evidencing around Best Value and justification for our preferred Plan</b>	 <b>Increased alignment of DWMP to other strategies and delivery plans</b>	 <b>Increased number of proposed solutions</b>	 <b>Rewritten and restructured parts of the documents to be clearer and more accessible</b>	 <b>More detailed content throughout, especially on strengthening partnership working and stakeholder engagement</b>
 <b>Additional future scenario testing</b>	 <b>Increased balancing of risk, ambition and deliverability</b>	 <b>Earlier planned implementations</b>	 <b>New dedicated technical appendices</b>		

\* Some consultation feedback didn't require further action or wasn't relevant to the DWMP process. Other feedback was relevant to future DWMP planning cycles and will be used to inform this work.

Figure B – How your feedback has helped shape our final plan





Figure C - Consultation feedback key themes





## In summary

We were committed to delivering an extensive and inclusive consultation approach for our dDWMP. We are extremely grateful for the ~1,400 pieces of feedback that we received as part of the dDWMP consultation. We've learnt a lot about our customers, stakeholders and our region from this feedback and throughout the first DWMP cycle. It has broadened and deepened our knowledge and understanding around the risks and opportunities across our region, and it has also given us invaluable customer and stakeholder engagement insights, that will further support successful DWMP collaboration going forward.

We believe our response to the consultation feedback has further enhanced our fDWMP and its ability to help our customers, communities and the natural environment in our region to thrive now and in the future.

We end this executive summary with examples of positive responses from our stakeholders (Box 1) and customers (Box 2).

### **Box 1 - Selected consultation feedback from stakeholders**

*"The proposed goals for flood risk, as well as shift in delivery approach to achieve them, are very ambitious. It is welcoming to see Thames Water aspire to such significant reductions in sewer flooding"* **Environment Agency**

*"We commend the aims to use widespread nature-based solutions as far as possible as well as partnership working as a key solution to improving drainage"* **Greater London Authority**

*"We consider that your dDWMP is generally well structured, well developed and includes the expected documentation"* **Ofwat**

### **Box 2 - Summary of dDWMP customer research; Eftec, Oct 2022**

*...Overall, customers showed a good level of support for the preferred plan, both in terms of its acceptability (>60%) and the preference for it over alternative scenarios, where it was on balance the most preferred option.*

*...Customer feedback indicated that the survey was well-received. It was found to be informative, understandable and straight-forward to complete. Overall, respondents were engaged in the topic and gave considered responses.*

*...There was unanimity that both the [customer] survey in general, and the plan support and preference questions specifically, were credible. This was due to the clarity of questions and the background information that was provided.*



## 1. Introduction

- 1.1. This Technical Appendix summarises the feedback we received from the open consultation and our customer survey research on our Draft Drainage and Wastewater Management Plan (dDWMP or Plan) and sets out how we have approached the development of our Final DWMP (fDWMP), considering the consultation feedback we have received. In considering the responses, we have identified a number of consistent themes. This document sets out our responses to those key themes.
- 1.2. The structure of this document is as follows:
- Executive Summary
  - Section 1: Introduction
  - Section 2: Overview of the consultation
  - Section 3: Analysis and Insight
  - Section 4: Summary of the main themes raised by the consultation
  - Section 5: Detailed review of sub–themes raised by the consultation and how we have addressed them
  - Section 6: Responses from our regulators
  - Section 7: Conclusions
- 1.3. In the appendices of this document, you can find:
- A. Email advising of the public consultation
  - B. List of stakeholders who responded
  - C. Public consultation questions and summarised responses
  - D. Customer research questions and summarised responses
  - E. Spread of stakeholder responses by theme
  - F. List of suggested solutions
  - G. Stakeholder view of the resilient plan
  - H. Feedback from, and our responses to, regulators and key stakeholders

### What is a Drainage and Wastewater Management Plan?

- 1.4. A DWMP is a long–term strategic plan that sets out how wastewater systems, the drainage networks that impact them and the treatment of wastewater prior to being returned to the environment, are to be extended, improved, and maintained to ensure they are robust and resilient to future pressures. The planning period is 25 years, with this first cycle of DWMPs starting in 2025 and ending in 2050. DWMPs will be iterated every five years with the first one, known as ‘cycle 1’, to be published as a final plan in May 2023. Although the DWMP is a five–year cyclical process and set of documents, its approach is embedded into our everyday planning activities. We plan to continue making progress as the DWMP develops, particularly through collaborative partnerships and adaptive delivery.
- 1.5. We have taken a long–term perspective in recognition of the scale and complexity of the drainage and wastewater management challenges that we face. We have designed our DWMP to satisfy the objectives as summarised in Figure 1–1.

Theme	Planning objective	What we're trying to achieve
Environment 	Sewage treatment works quality compliance Sewage treatment works flow compliance Risk of pollution incidents Storm overflow performance Carbon Wellbeing	Protection of our environment, looking after the health of our communities, rivers and aiming for zero pollution incidents
Property flooding 	Internal sewer flooding risk External sewer flooding risk % of properties at risk of sewer flooding in a 1 in 50-year storm Reduce surface water runoff Reduce misconnections Sewer collapses	Development of our wastewater system to deliver a reliable and efficient service and to be resilient to the risks of flooding
Asset health 		

Figure 1–1 DWMP objectives

## 2. Overview of the consultation

### Our publication

- 2.1. We published our dDWMP on our website on 30 June 2022.
- 2.2. The dDWMP is a suite of documents, including: a Customer Summary, a Non–Technical Summary, a Technical Summary, and the main Plan document. To support these four main documents, we also produced 13 regional Catchment Strategic Plans, and a series of technical appendices. These were hosted on our website with links to the industry framework document. Finally, two series of interactive maps were made available; a customer friendly ‘story map’, accessed via our Customer Portal; and a more detailed stakeholder ‘Practitioner Portal’, which includes further details and data from each stage of the DWMP. The practitioner portal provides more detail for stakeholders who would use the DWMP data to support their core activities. Accessing and confidently using the data in the practitioner portal requires reasonable technical knowledge and is therefore not suited to all members of the public. The Customer Portal was created for all users to actively engage with the data and does not require a background technical understanding.

### The consultation

- 2.3. We undertook a formal public consultation of regulators, stakeholders and customers to collect feedback on our dDWMP. Alongside this we also undertook customer research using an online survey to collect additional feedback from our household (residential) and non–household (commercial) customers. Details of each part of our consultation are provided in the following subsections.

#### Public consultation

- 2.4. A consultation invitation email was sent to stakeholder organisations (see Appendix A). These organisations included lead local flood authorities, river catchment partnerships, environmental groups and regulators, as well as parish councils and individuals who had expressed an interest and engaged as a stakeholder during the development of the DWMP.



- 2.5. Consultees were able to make representations on the draft plan online via our dDWMP website, via email or by post.
- 2.6. The consultation questions were targeted to ensure we gathered feedback that would improve our understanding of consultee views on the plan. This would allow us to make adjustments that consultees would like to see. The consultation form also contained space for free text, where consultees could add any comment they wished. Additionally, the form had upfront information for each section so that consultees had some context to provide an informed response.
- 2.7. The full set of consultation questions are in Appendix C, and cover the following topics:
- Planning objectives
  - Solutions
  - Partnership solutions
  - A range of plans – London area
  - A range of plans – Outside of London
  - Trade-offs
  - Stakeholder engagement

#### Customer surveys

- 2.8. The customer research was implemented as an online survey in August – September 2022, with a representative sample of wastewater services customers (bill payers), covering both households and non-households, and segmented by the London and Thames Valley & Home Counties operational areas. We specifically commissioned third party specialists to develop and deliver this survey. A copy of the questions and a summary of the responses received is provided in Appendix D.
- 2.9. The customer survey was developed through an iterative test and re-test approach using one-to-one cognitive interviews and a pilot survey. The purpose of the cognitive testing was to:
- Test whether customers understood what the survey was about and what its purpose was
  - Understand what and how much contextual information was required by customers
  - Test the layout and appearance of the survey
  - Assess how easy or difficult it was to complete, and to assess the clarity of instructions
  - Understand the thinking behind how customers made their choices
- 2.10. Two variants of the survey were developed – one for household customers and a second for non-household customers. Each variant featured two versions – one for London customers and one for Thames Valley & Home Counties customers – which presented the relevant details of the DWMP in each.

2.11. The sampling approach reflected the research objective to provide segmented results for the London and Thames Valley & Home Counties areas. Overall, people understood what the survey was about and what they were being asked to do in the cognitive interviews. Simple formats comparing plans and more detail on bill profiles helped to make the plans accessible to customers.

### Breadth of consultation responses

#### Public consultation

2.12. In total we received 95 responses to the public consultation. The total number of submissions received online via a feedback form and by letter or email, is shown in Table 2–1.

Channel	Number of responses
Letter or email	15
Online – Microsoft forms	80
Total	95

**Table 2–1 Number of responses to our public consultation**

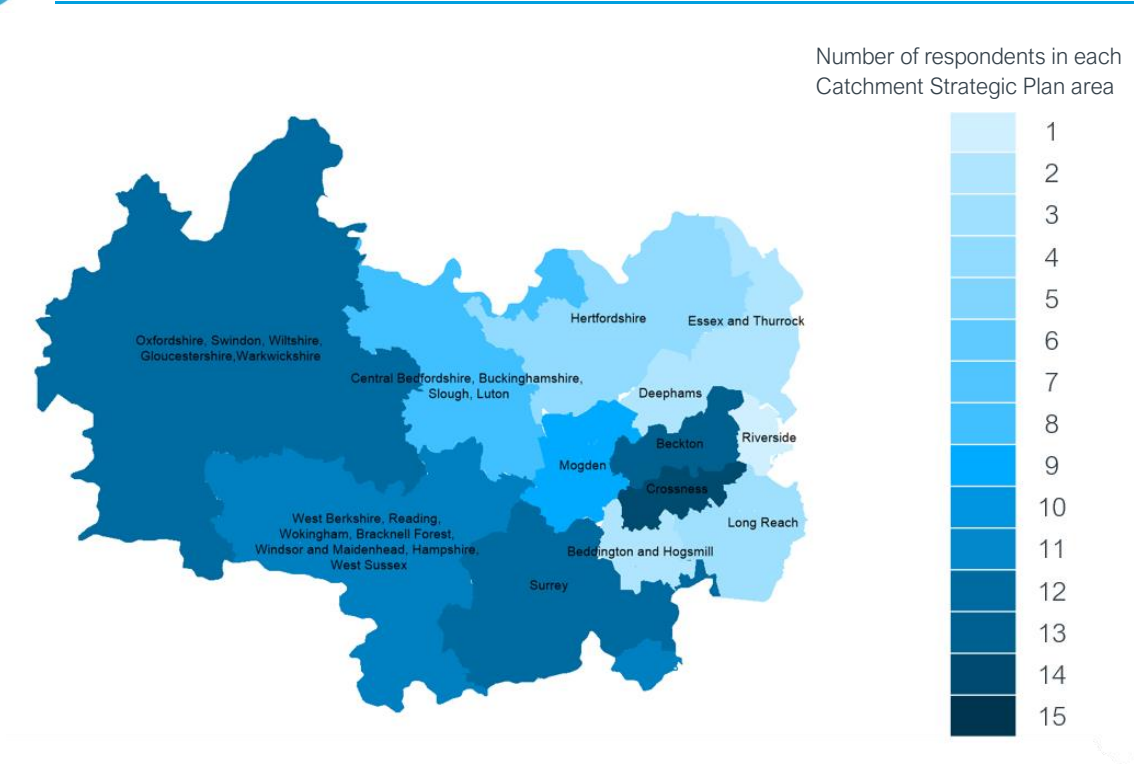
2.13. Table 2–2 shows the breakdown of respondents, by sector, who submitted a response either by letter or email to the consultation. A full list of stakeholders who responded to our consultation is provided in Appendix B.

Stakeholder	Total	Percentage
Local Authority (including Lead Local Flooding Authority)	31	33%
Individual	19	20%
Other Environmental Group	17	18%
River Catchment Partnership	15	16%
Other	7	7%
Regulator	4	4%
Water Company	1	1%
Parish Council	1	1%
Total	95	100%

**Table 2–2 Breakdown of respondents by stakeholder group**

2.14. We wanted to understand where across the Thames Water wastewater region our responses came from. Figure 2–1 is a map showing our 13 Catchment Strategic Plan areas, colour coded by the number of responses we received in each area. We received at least one response from all 13 areas. Darker colours show a higher number of responses, while lighter colours show fewer. The map reveals a clear east west variation in responses, except for central London, where the response was more comprehensive. We believe this east west split may be due to administrative boundaries in the east overlapping more than one water company, requiring organisations to engage with two water companies on their DWMPs at once. When we undertake consultation on our next DWMP (cycle 2), we will review our consultation approach to ensure that we are engaging eastern areas appropriately, for the level of engagement they are able to provide.





**Figure 2–1 Geographic reach of public consultation**

2.15. A closer look at the geographic spread of the public consultation reveals that:

- Four Thames Water regions received comments from four or more Local Authorities, these were: 1) Oxfordshire, Swindon, Wiltshire, Gloucestershire, Warwickshire, 2) West Berkshire, Reading, Wokingham, Bracknell Forest, Windsor and Maidenhead, Hampshire, West Sussex, 3) Beckton and 4) Crossness. Seven of the other eight Thames Water regions only received one or two responses from local authorities.
- Two Thames Water regions received comments from three River Catchment Partnerships, these were: 1) Central Bedfordshire, Buckinghamshire, Slough, Luton and 2) Beckton. All other Thames Water regions received less than three responses from River Catchment Partnerships.
- Three of our Catchment Strategy Plan areas received comments from four Environmental Groups, these were: 1) Mogden, 2) Beckton and 3) Crossness. All other Thames Water regions received two or less responses from Environmental Groups. We recognise that some of the environmental groups consulted provided a single response that covered multiple catchments.

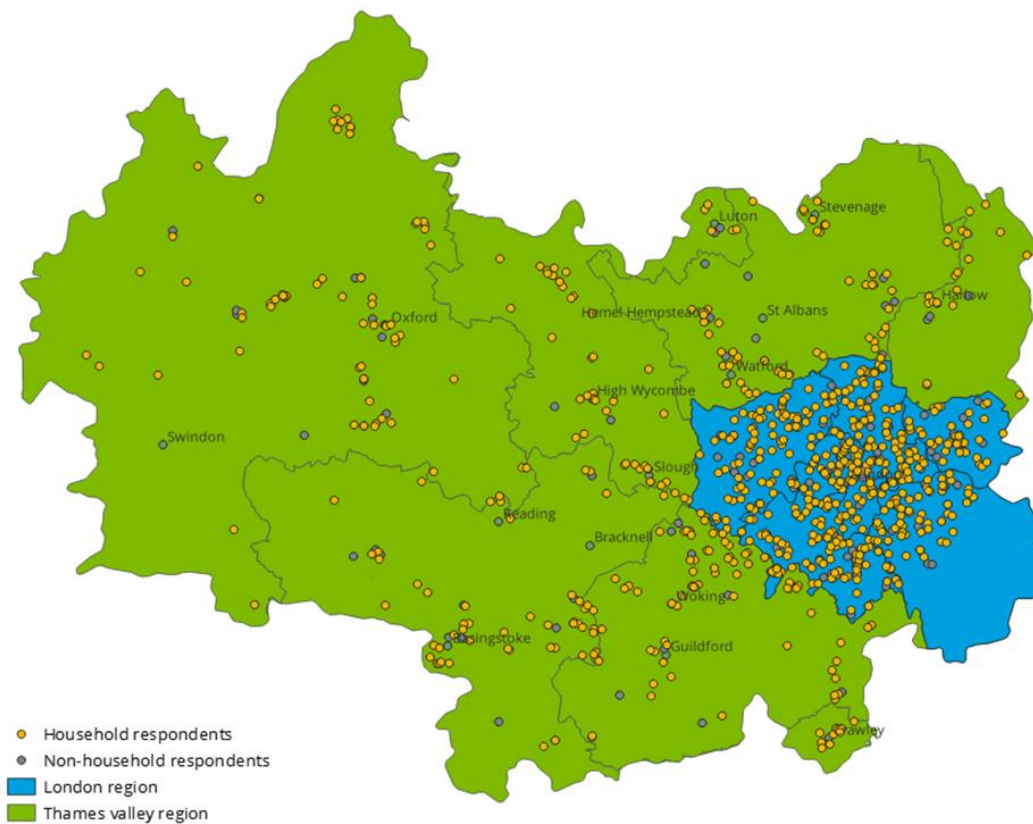
- 2.16. We consider that we collected sufficient responses from our public consultation:
- All stakeholder groups were well represented, see Table 2–2
  - We received responses from within all 13 of our Catchment Strategic Plan areas

Customer survey

- 2.17. Table 2–3 shows the number of responses from the customer research completed by a third party on our behalf, split by household (domestic) and non–household (commercial) customers, as well as geographically by London and Thames Valley & Home Counties. The smaller survey for non–households reflects the smaller customer base. Figure 2–2 shows the location of the customers surveyed and that the research was less dense outside of London. This is representative of the very large customer base in London.

Area		Number of respondents
Household	London	502
	Thames Valley & Home Counties	502
	Total	1,004
Non–household	London	150
	Thames Valley & Home Counties	150
	Total	300

**Table 2–3 The number of responses from customer research and engagement**



**Figure 2–2 Geographic distribution of customer survey respondents**

2.18. Our customer online survey was designed for our two customer groups – household and non-household. Our survey method ensured that the household sample was representative of Thames Water customers, both in London and Thames Valley & Home Counties regions with regard to:

- The socio-economic group of participants (see Figure 2–3)
- The gender cohorts (see Figure 2–3)
- Age cohorts in the targeted demographic, i.e., over the age of 18 (Figure 2–3)

2.19. Our survey method also ensured that the customer survey non-household sample was also representative of Thames Water customers, both in London and the Thames Valley & Home Counties regions, with regard to sector representation (primary, secondary and tertiary industry) (see Figure 2–4).

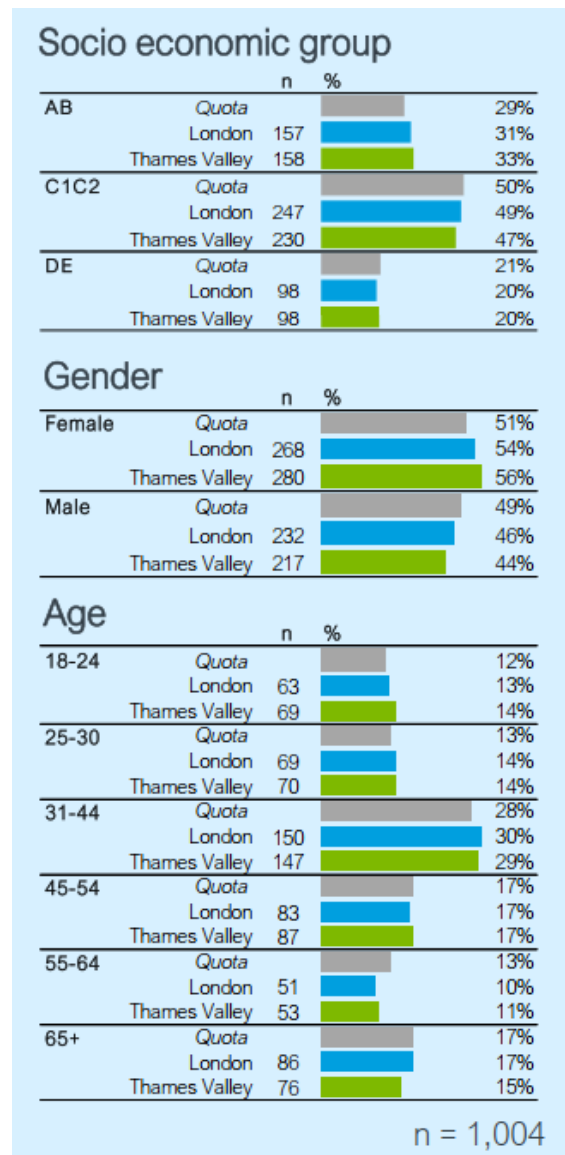


Table note: Socio economic groups: AB – Higher & intermediate managerial, administrative, professional occupations; C1C2 – Supervisory, clerical & junior managerial, administrative, professional occupations. Skilled manual occupations; DE – Semi-skilled & unskilled manual occupations, Unemployed and lowest grade occupations

**Figure 2–3 Socio economic, gender and age profile of customer survey respondents**



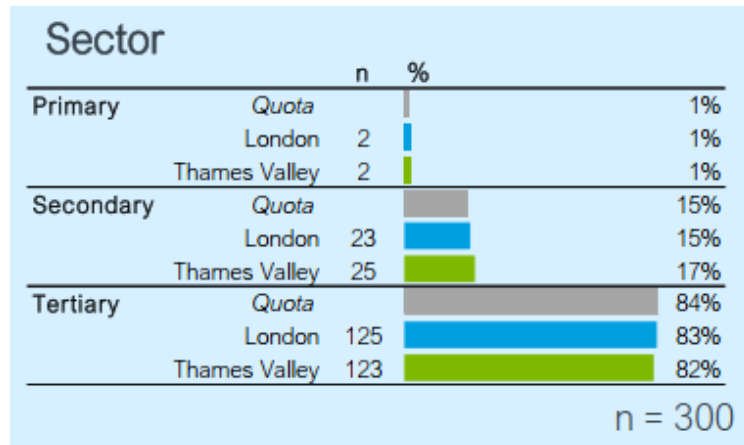


Table note: Primary industry harvests or extracts natural resources from the environment producing outputs such as crops, minerals and livestock. Secondary industry is made up of value-adding activities such as construction and manufacturing. Tertiary industry is service based; for example banking, healthcare and transportation.

**Figure 2–4 Industrial sectors of non-household customer survey respondents**

2.20. We consider that we collected sufficient responses from our customer survey:

- We received over 1,300 responses from customers
- The response was representative of our customer base (household vs non-household)
- The response was balanced geographically (London vs Thames Valley and Home Counties) and sufficiently well spread out within these areas with regard to population density
- The response was representative of our customer base with regard to the socioeconomic profile, gender and age group of participants

### Quality of consultation response

2.21. The quality of the response received was high:

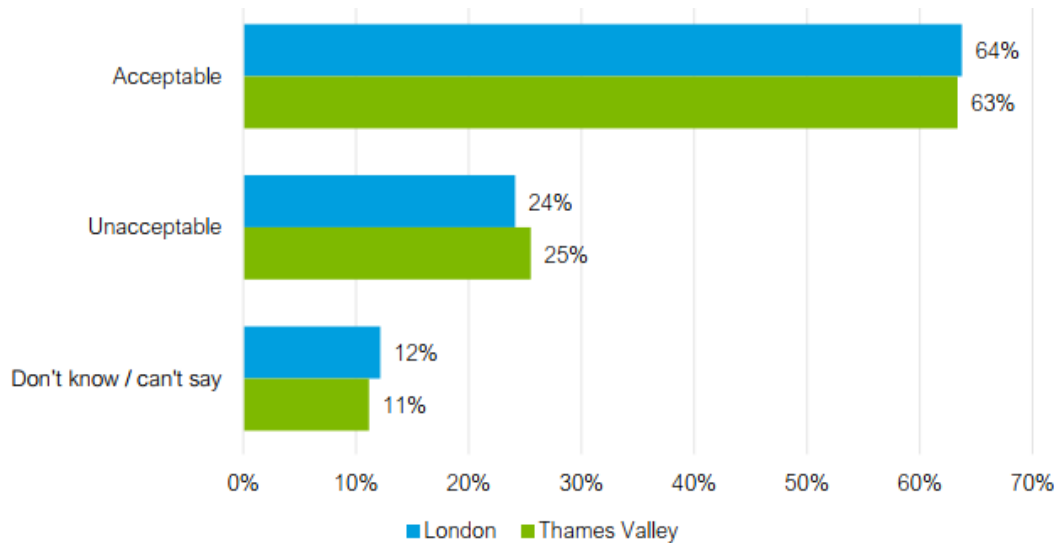
- We were able to action the majority of comments in our fDWMP. Other comments either did not require further action (e.g., comments of support); weren't relevant to the DWMP process; or are to be considered for future DWMP cycles
- Only 0.3% of the points you raised could be resolved by content that was already in the dDWMP
- Only 0.2% of the points you raised were outside of the scope of DWMPs

### Expectations of consultees

2.22. DWMPs are currently in their first 5-year cycle and are being produced on a non-statutory basis for early 2023 in England and Wales. We have made every effort to follow the guiding principles for DWMPs that our regulators have set. Twenty percent of the points raised in the public consultation showed us that you wanted us to go beyond the DWMP regulatory requirements, or that you wanted us to do things that were not feasible in the time between publication of the draft and final documents. These did not lead to a change to our DWMP, but we have taken these points onboard for our next DWMP (cycle 2).

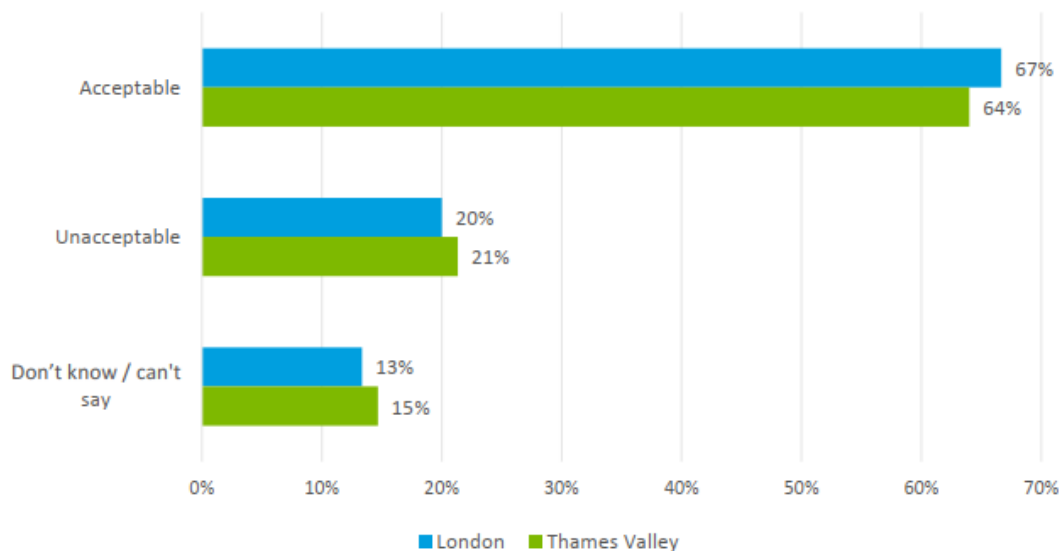
### 3. Analysis and Insight

3.1. More than 60% of our customers agreed that our plan was acceptable, see Figure 3–1 (household customer results) and Figure 3–2 (non-household customer results).



n = 1,004

Figure 3–1 Overall, how acceptable is the plan for improving the wastewater system in the region and its impact on customer bills? (Customer survey question to household customers)



n = 300

Figure 3–2 Overall, how acceptable is the plan for improving the wastewater system in the region and its impact on customer bills? (Customer survey question to non-household customers)

3.2. Figure 3–3 summarises feedback from the public consultation about how ambitious our stakeholders thought our dDWMP was. Although our dDWMP was largely acceptable to our customers the figure below reveals that our stakeholders felt our targets should have been more ambitious.

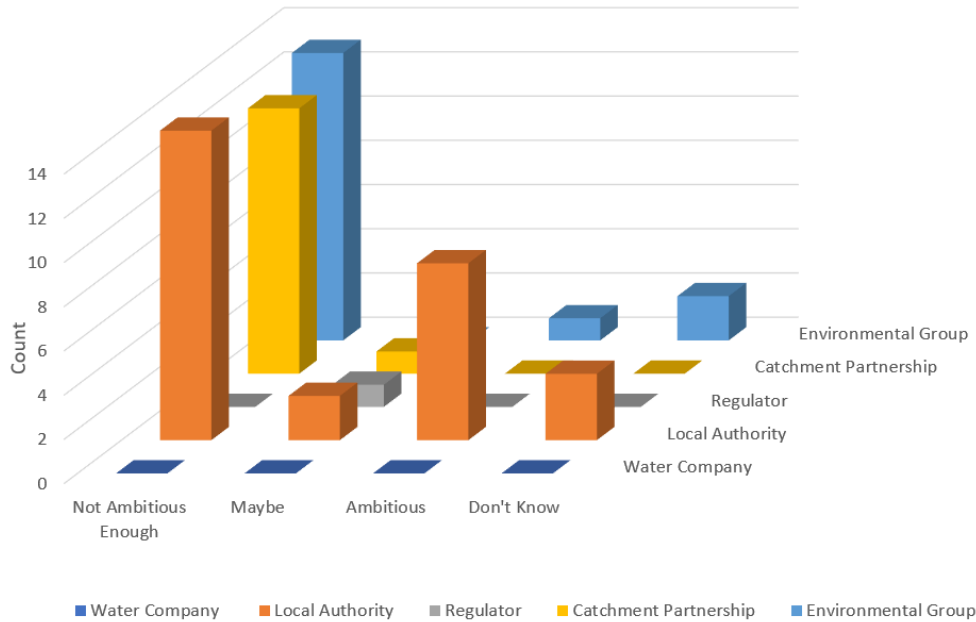


Figure 3–3 Do you think these targets are too ambitious or not ambitious enough for a 25-year plan? (Public consultation question)

3.3. Our customers showed a clear preference for an even paced delivery profile for our DWMP (an even level of increased investment over 25 years) (see Figure 3–4). After this a fast delivery pace (higher level of investment with more upfront spend) was less desirable than a steady pace (lower level of increased investment over 25 years with priority areas upfront and keeping bills affordable for customers).

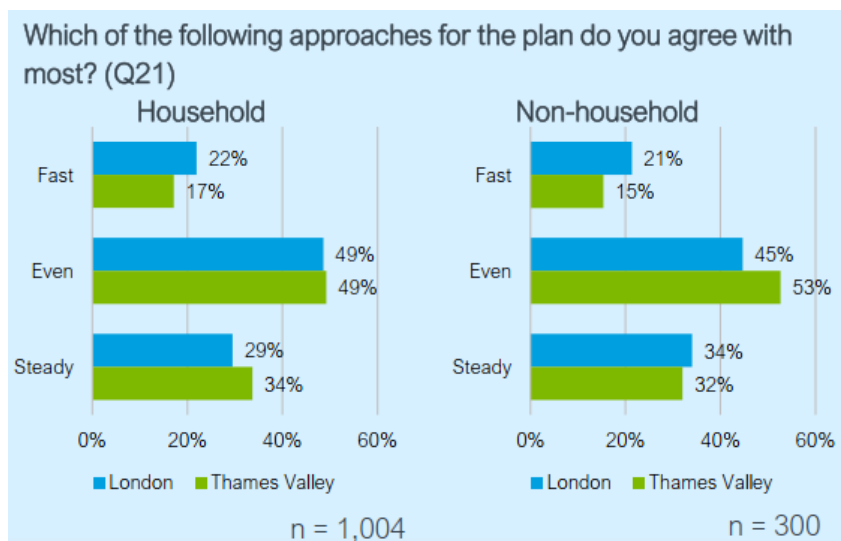
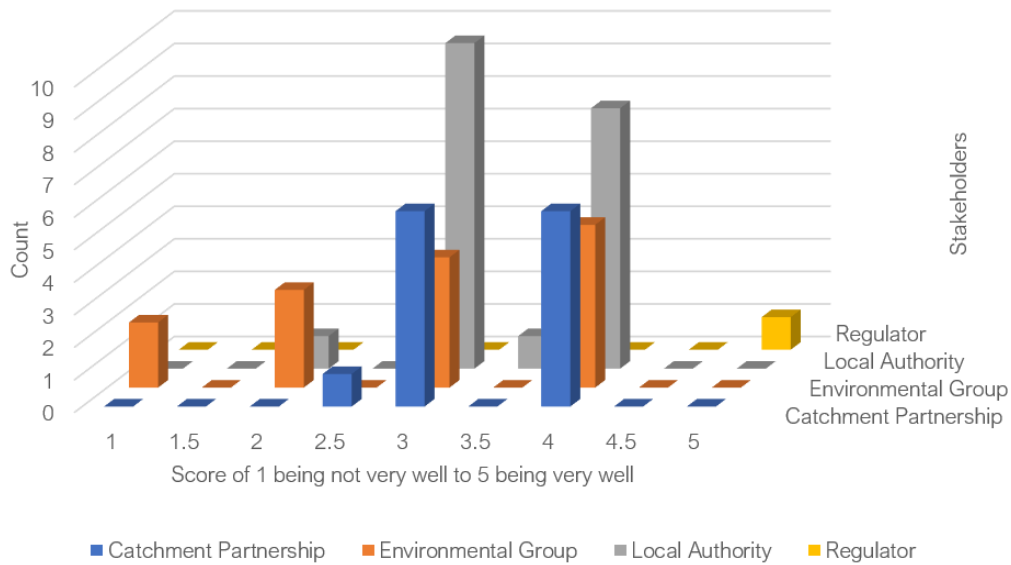


Figure 3–4 Which of the following approaches for the plan do you agree with most? (Customer survey question)



3.1. The consultation showed that our stakeholders generally feel that we have achieved our aim of creating a shared plan through stakeholder interaction (see Figure 3–5).



NB: 9 of the consultation responses we received did not answer this question.

Figure 3–5 On a scale of 1 to 5, how well do you believe we achieved the aim of creating a shared plan through stakeholder interaction? (Public consultation question)

3.2. For households, reducing property flooding had the highest (average) ranking, see Figure 3–6. For non-household customers there was a preference for reducing storm overflows. For both groups protecting the environment was their second most important target.

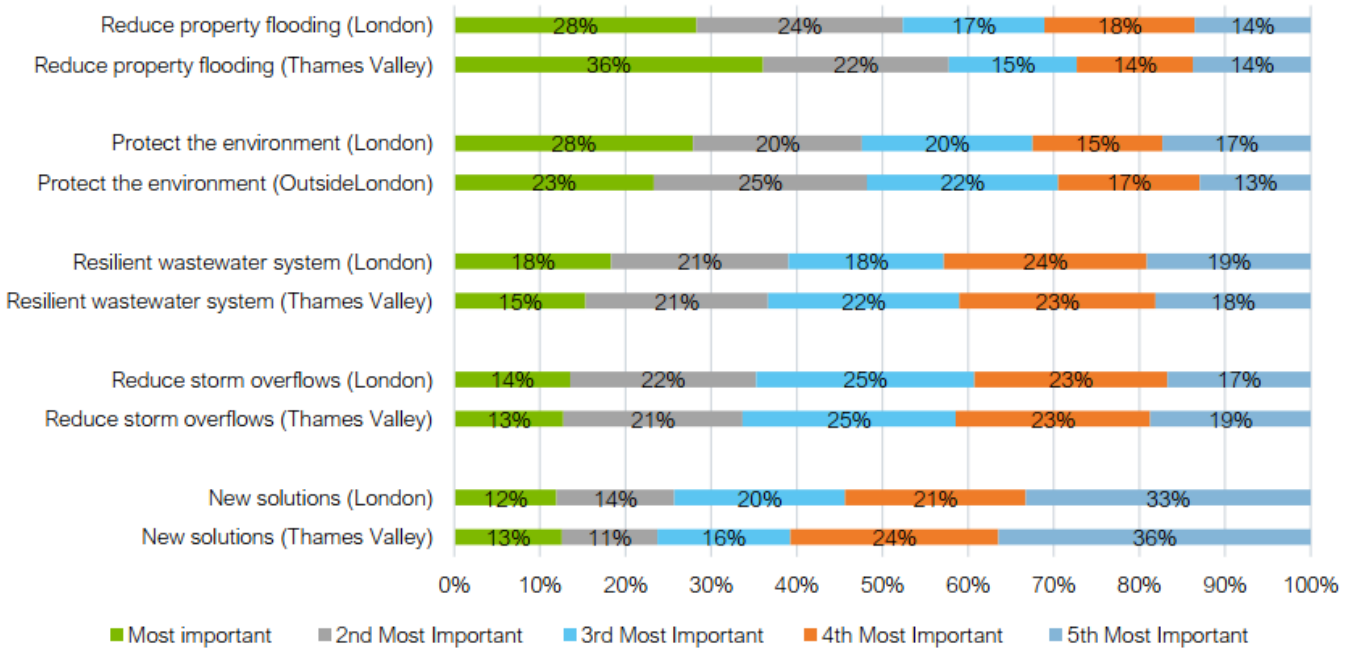


Figure 3–6 Ranking of targets by household customers from 1–5 in terms of which they thought was the most important to achieve

## 4. Summary of the main themes raised by the consultation

- 4.1. The consultation responses have provided us with an extremely rich dataset. We have carefully reviewed the responses and, in doing so, have identified six key themes that they can be split into; these are set out in Figure 4–1. Each theme is split into a number of sub–themes, with Figure 4–1 also showing how many of the consultation responses mentioned each. The figure reveals that:
- Most of the sub–themes were mentioned in approximately 25–45% of your responses
  - Four sub–themes were mentioned in more than 60% of your responses, these referred to:
    - Amendments to our targets
    - Suggestions for solutions
    - Positive responses to our partnership working
    - Suggestions for stakeholder engagement
  - Sub–themes mentioned the least included:
    - Impact on customer bills
    - Queries on solution prioritisation
    - More data sharing
- 4.2. Detailed definitions of what’s covered by each sub–theme are provided in Section 5, along with further details of our response.
- 4.3. A review of the feedback provided by our regulators is presented in Section 6. Detailed individual responses to the feedback provided by key stakeholders, including MPs, are provided in Appendix H.

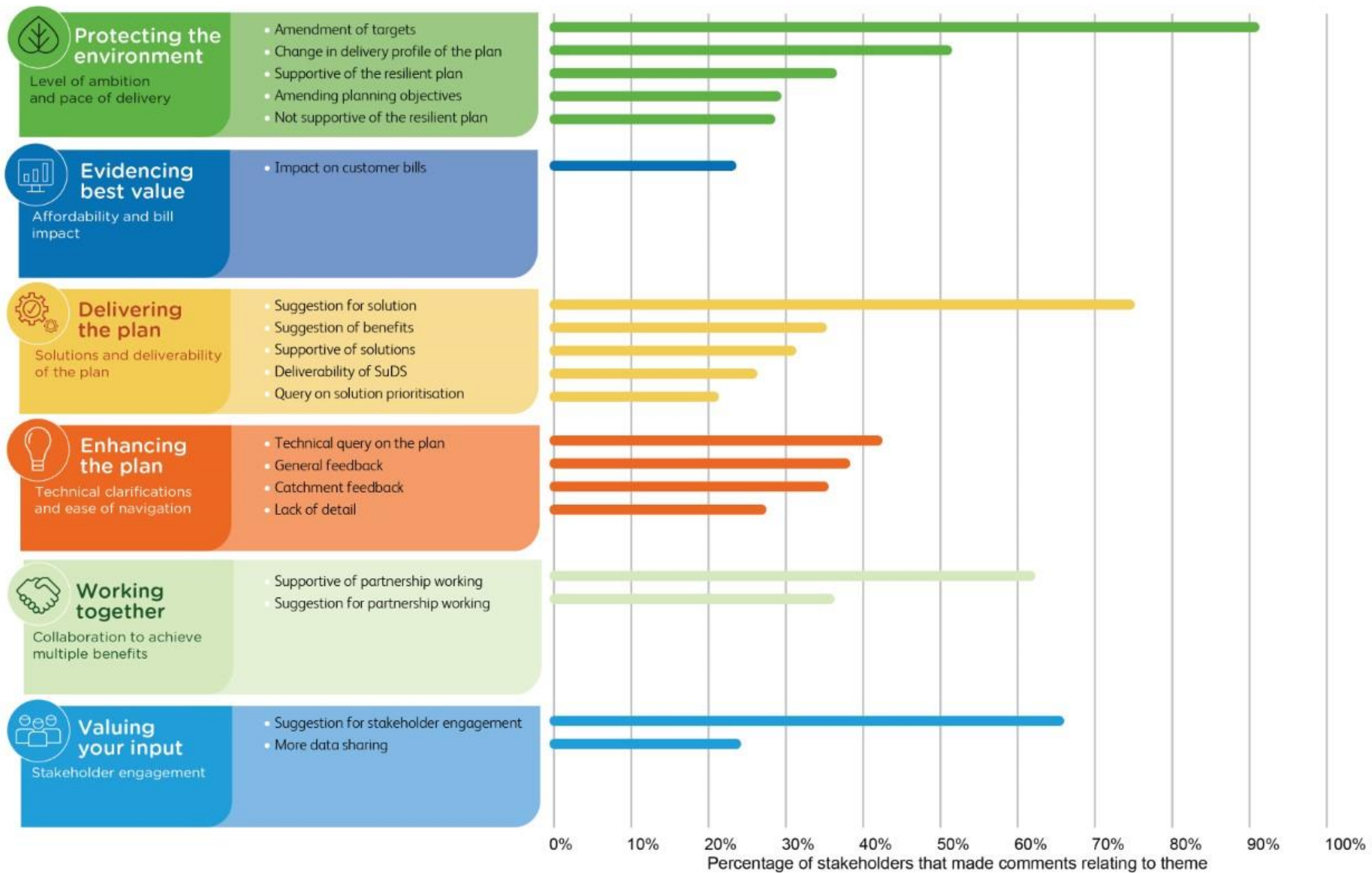


Figure 4–1 Count of stakeholder responses to common themes arising from the consultation



## Comparison of responses to the public consultation and customer surveys

4.4. Two consultation exercises have been undertaken, a public consultation and customer surveys (see Section 2 for details about each consultation exercise). The full set of questions we asked for each is provided in Appendix C and Appendix D. The questions we asked in both consultation exercises were aligned, but their format and content were tailored to meet the needs of the different audiences. Below we have drawn some high-level comparisons between the two sets of responses that we received:

- **Pace of the plan:**

- Customer survey: Respondents tended to favour an “even” pace of investment. The main reasons cited were that there is more time for planning to ensure the targets are actually met and to have a lower bill impact upfront, that will be more affordable. “Fast” pace was the least preferred profile overall.
- Public consultation: Respondents were concerned that in the preferred resilient plan, the outcomes would not be achieved until late in the DWMP’s planning period, and that earlier delivery of solutions in the plan would be preferred.

- **Targets:**

- Customer survey: Just over 50% of our household respondents supported more stringent storm overflow targets at added cost. But this level of support reduced if added investment came at the expense of efforts to reduce flooding (<50%). There was a higher level of support from non-household respondents for more stringent targets for storm overflows, even if it resulted in higher bills / came at expense of efforts to reduce flooding.
- Public consultation: Stakeholders told us that a 2050 target of 10 spills per storm overflow per annum is not ambitious enough, and that storm overflows which impact the most sensitive catchments and/or overflows that discharge greatest volumes and caused the most pollution, should be identified, prioritised and targeted early in the programme.



- **Overall acceptability:**

- Customer survey: There was a good level of support for the preferred plan. For households: >60% “acceptable” or “very acceptable”. For non-household customers: >65% “acceptable” or “very acceptable”.
- Public consultation: We received mixed views on our preferred plan. Overall, the majority of stakeholders responded, “yes the resilient plan should be the preferred plan”. The majority of stakeholders outside London responded “yes”, and the response was equally split within London (see Appendix G for details).

4.5. It should be noted that our public consultation includes responses from a wide range of stakeholders including some customers, listed within the ‘individuals’ group in Table 2–2.

## 5. Detailed review of sub–themes raised by the consultation and how we have addressed them

- 5.1. In Table 5–1 to Table 5–6, we have tabulated each theme and sub–theme shown in Figure 4–1. Our response to the comments made can be found in these tables. For each sub–theme, the tables also identify the feedback source/s of the comment. Feedback sources have been grouped as follows:

	<p><b>Customer survey</b>            feedback provided during our customer research exercise</p>
	<p><b>Consultation</b>            feedback provided during our public consultation</p>
	<p><b>Regulator</b>            feedback from our regulators, provided during our public consultation</p>

- 5.2. A full breakdown of which stakeholders were associated with the feedback received for each sub–theme is provided in Appendix E.
- 5.3. In addition to the sub–themes identified in Figure 4–1, we have added regulator comments, where relevant, to the bottom of each table. This is because many regulator comments were much wider than those provided by stakeholders. Regulators replied in bespoke reports containing detailed feedback. We have further considered feedback from our regulators in Section 6 and provided individual responses to their feedback in Appendix H.

## Protecting the environment Level of ambition and pace of delivery



5.4. Your feedback on the 2050 targets and the ambitiousness of our plan is set out in Table 5–1, along with the actions we took in response.

5.5. The main sub–themes emerging from your feedback were:

- **Amendment of targets** – Many stakeholders commented that the targets we set should have been more ambitious, more granular, and that they would like to see the targets amended. These comments were typically made with reference to:
  - Storm overflow targets – going less than 10 storm overflows per annum.
  - Sewer flooding targets – reducing the properties at risk in higher return periods.
- **Change in delivery profile of the plan** – The timing and pace of investment proposed was perceived to be too slow for both storm overflows and flood risk reduction.
- **Views on the preferred resilient plan** – Your views on our preferred resilient plan, in comparison with other plans presented in our dDWMP, i.e., our maximum performance plan and maintaining current performance plan. Whilst in Table 5–1 this is covered as a single item, we have split this into two sub–themes in Figure 4–1 to reflect the detail of responses received:
  - Supportive of the preferred resilient plan.
  - Not supportive of the preferred resilient plan.
- **Amending planning objectives** – We received feedback on how we could adjust our planning objectives, for example adding a new planning objective.
- **Regulator comments** – Additional comments from regulators that are relevant to this theme are included at the end of this table. A more detailed review of comments from our regulators is provided in Section 6.

Sub–theme	You Said	Feedback Source	We Did	Documentation updated
Amendment of targets a) storm overflows	You told us that a 2050 target of 10 spills per storm overflow per annum is not ambitious enough.	Consultation	Since our dDWMP, storm overflow reduction requirements have become better defined. Defra’s Storm Overflows Reduction Plan <sup>1</sup> and the Environment Act 2022 set out the statutory obligations on us and aim to ensure sites are given appropriate priority over the period to 2050. Specifically, this requires us to deliver improvements to sites discharging to sensitive watercourses by 2035, and a target of three spills per bathing season for sites discharging to designated bathing waters. Other receiving waters have a target of ‘no ecological harm’, or a maximum 10 spills per overflow per annum.	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a> (section 3)</li> <li>• <a href="#">Appendix E – Programme Appraisal</a> (section 7)</li> <li>• <a href="#">Appendix G – Adaptive Pathways</a> (section 4)</li> <li>• <a href="#">Storm Overflows – new technical appendix</a> (Executive Summary)</li> </ul>
	<p>Our customers told us they did not universally support the reduction of storm overflows; their support reduced if the reduction would lead to an increase in cost or would be achieved at the expense of other investments.</p> <p>Customers told us that reducing flooding and protecting the river environment over the longer term, from day–to–day discharges from treatment works, ranked higher than reducing storm overflows.</p> <p>Customers wanted a balanced plan that makes progress across a number of areas like flooding, resilience, sewage treatment works upgrades and storm overflows. Customers did not support focusing our plans on one specific challenge, particularly if that was to the detriment of addressing other needs which have been identified in the course of developing the DWMP.</p>	Customer survey	<p>Our fDWMP follows the principles of the dDWMP storm overflow performance targets and exceeds the minimum requirements of the Storm Overflows Reduction Plan by delivering the statutory obligations earlier. The sensitivity of our plan to more ambitious storm overflow targets, including no untreated discharge to watercourses and a target of zero spills, has also been considered.</p> <p>We have undertaken additional scenario testing within our programme appraisal activities to understand the impact of a plan which explores the priorities as agreed, and how implementing solutions earlier in the planning period, and delivering more challenging targets (e.g., flooding and resilience), impact on our plan. The targets have been reassessed as a result of the additional scenario testing, which has led to a change in the detail of the programme. This, and sensitive catchment prioritisation have been further described in a new Storm Overflows technical appendix.</p>	

<sup>1</sup> [Storm Overflows Discharge Reduction Plan.pdf \(publishing.service.gov.uk\)](#)



Sub-theme	You Said	Feedback Source	We Did	Documentation updated
Amendment of targets a) storm overflows (continued)	You said storm overflows which impact the most sensitive catchments and/or overflows that discharge the greatest volumes and caused the most pollution, should be identified, prioritised and targeted early in the programme.	Consultation Regulators	We have added a new technical appendix on storm overflows, that identifies sensitive storm overflow locations. It is important to note that phasing in 2025–2030 has more certainty than post 2030, due to better data (from EDMs) and future WINEP studies. We have also made changes in our fDWMP around our storm overflow targets. These changes include: <ul style="list-style-type: none"> <li>Developing a constrained profile which shows milestones and prioritisation, to evidence the costs for storm overflow schemes.</li> <li>Developing a new scenario in programme appraisal to assess the benefits of investment in interventions that will provide better information, and reduce uncertainties in our plan; e.g., undertaking modelling and monitoring of surface water inflows, sewer overflows, etc.</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">The Plan</a> (section 3)</li> <li><a href="#">Appendix E – Programme Appraisal</a> (sections 5-7)</li> <li><a href="#">Appendix D – Options Development Appraisal (ODA)</a> (sections 4, 5, 6, 7, 9, 10)</li> <li><a href="#">Storm Overflows – new technical appendix</a> (sections 1, 3, 5)</li> </ul>
	You told us that the dDWMP would be improved by including a constrained profile which shows milestones and prioritisation, to provide evidence on the cost for these storm overflow schemes.	Regulators	Please also see above response. Our DWMP scenarios reflect the storm overflow priorities set out in the WINEP. The evidence behind prioritisation is in the WINEP and is outlined in our Storm Overflows Technical Appendix. We are not reproducing the storm overflow only scenario with the changes required for WINEP, yet it will be clearly visible from the Appendix and the DWMP Data Tables (for costs).	<ul style="list-style-type: none"> <li><a href="#">Storm Overflows – new technical appendix</a> (section 1)</li> </ul>
	You said a new scenario is required in programme appraisal to show the impact of undertaking water quality monitoring of sewer overflows.	Regulators	We have outlined how better information that accounts for a range of opportunities that will improve data and information, may change the plan in our Next Steps section of The Plan document.	<ul style="list-style-type: none"> <li><a href="#">The Plan</a> (section 6)</li> </ul>
Amendment of targets: b) Sewer flooding	You expressed concerns that property protection up to a 1 in 50–year storm is not ambitious enough. Views were expressed that with more frequent and intense storms, we should be considering higher return period events. We also received feedback that adjusting the targets to higher return periods would increase the cost of the plan, which would also be a concern.	Consultation	Our DWMP follows the industry guidance and focuses on 1 in 50–year flood event. This was agreed with an industry wide working group as a common planning objective and written into the Framework document. In response to the feedback, we propose to complete a trial within London that will understand, and part deliver, flood alleviation in a 1 in 50–year storm and greater. Details can be found in the Technical Appendix on Responding to London 2021 Flooding. This may be considered in DWMP Cycle 2 as a new common metric.	<ul style="list-style-type: none"> <li><a href="#">Appendix G – Adaptive Pathways</a></li> <li><a href="#">Response to London 2021 Flooding – new technical appendix</a> (section 5)</li> </ul>
	Our customer survey research indicated that there were mixed views towards sewer flooding and storm overflows. On balance, respondents scored sewer flooding as a more pressing issue than storm overflows, but it should also be noted that around a third of respondents felt that both issues were of equal severity.	Customer survey		
	You highlighted that some of the targets use language like ‘where possible’, which creates ambiguity around what will be delivered.	Consultation	We have changed the language we use in our fDWMP to minimise ambiguity. We will be reviewing our planning objectives during the strategic context stage of our next, cycle 2, DWMP and will be considering this feedback as part of this review.	<ul style="list-style-type: none"> <li>All documents</li> <li>Cycle 2</li> </ul>
Change in delivery profile of the plan	You were concerned that in the preferred, resilient plan, outcomes would not be achieved until late in the DWMP’s planning period, and that earlier delivery of solutions in the plan would be preferred.	Consultation	A balance is required between affordability/deliverability and overall resilience. We have revised and enhanced this in our fDWMP. There are some regulator–defined changes that have also affected the pace of the plan. We also have a new ambitious scenario which demonstrates the impact of an accelerated plan on affordability. As part of the sensitivity testing looking at the level of ambition in the DWMP targets, we have run scenarios to demonstrate the implications to affordability, deliverability, and ambition by bringing the delivery of solutions forward.	<ul style="list-style-type: none"> <li><a href="#">Appendix E – Programme Appraisal</a> (throughout)</li> </ul>
	You said the targets we set ourselves should be SMART, i.e., specific, measurable, achievable, relevant, and time–bound; and, in particular, that they should be broken down into interim targets, against which progress could be monitored.	Consultation	Changes to the planning objectives or targets will be reviewed as part of our Strategic Context stage for our next, cycle 2, DWMP. We have enhanced the narrative of milestones in our fDWMP. Much of this data can also be found in the Data Tables which are published with the fDWMP.	<ul style="list-style-type: none"> <li>Cycle 2</li> <li><a href="#">The Plan</a></li> <li>Data tables</li> </ul>
	Our regulators also raised that there was a lack of clarity around activities and milestone targets within the short, medium, and long term timelines.	Regulators		

Sub-theme	You Said	Feedback Source	We Did	Documentation updated
Views on the preferred resilient plan: a) Supportive and b) not supportive	We received mixed views on our preferred resilient plan. Overall, the majority of stakeholders responded “yes, the resilient plan should be the preferred plan”. The majority of stakeholders responded “yes” outside of London, and the response was equally split within London (see Appendix G). There was steer from those not supportive of the plan, that we should review the balance between the different plans put forward, and that more immediate action is required, linking to the strong theme around earlier delivery of solutions.	Consultation	The sensitivity testing that we have completed (described previously in this table), to check our targets and the delivery profile for the fDWMP, addresses comments on the resilient plan that we should investigate delivering solutions earlier in the planning period.	<ul style="list-style-type: none"> <li>• <a href="#">Appendix E – Programme Appraisal</a> (sections 6 and 7)</li> </ul>
Amending planning objectives	We asked respondents which targets they would like to see in our fDWMP and in our next DWMP (cycle 2). This has provided us with a number of new ideas for how we could set out planning objectives, ranging from changing thresholds and targets we have set ourselves, through to recommendations of new targets. Appendix E shows how many stakeholders from each stakeholder group raised this.	Consultation	<p>We have begun to review potential changes to planning objectives in the next cycle of our DWMP. We have done this by collating the suggestions for planning objectives and will be working with our stakeholders throughout cycle 2 to further develop our planning objectives.</p> <p>As cycle 2 of the DWMP becomes statutory, we are unclear on our ability to select bespoke Planning Objectives. At present we propose to do so.</p>	<ul style="list-style-type: none"> <li>• Cycle 2</li> </ul>
	You asked for more granularity in how targets have been applied inside and outside of London. Appendix G summarises stakeholder views on the resilient plan inside and outside of London.	Regulators		
	You said groundwater should be included as a risk/planning objective to provide focus.	Regulators	We have met with stakeholders and the EA regarding groundwater and have created a new dedicated Technical Appendix in our fDWMP to outline our collective thoughts.	<ul style="list-style-type: none"> <li>• <a href="#">Groundwater – new technical appendix</a></li> </ul>
	You said greater clarity is needed around how Sustainable Drainage Systems (SuDS) are being valued, to better demonstrate what is best value. The Environment Agency said, “the plan should contain more detail within options appraisal regarding the assumptions employed that underpin the justification for the scale of the SuDS options.”	Regulators	<p>Our fDWMP provides more clarity of how SuDS are being valued, to better demonstrate what is best value, for example:</p> <ul style="list-style-type: none"> <li>• We have enhanced our ODA Technical Appendix, with demonstration of the difference in value between green and grey engineering solutions.</li> <li>• We have undertaken work to understand the difference in outcomes and costs between implementing grey or green solutions in the Deephams catchment.</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Appendix D – ODA</a> (references throughout)</li> <li>• <a href="#">Delivery of SuDS and nature-based solutions – new Technical Appendix</a></li> </ul>
Regulator comment 1) Adaptive planning	You said the adaptive planning approach should be applied to all areas of the plan or use Ofwat’s common reference scenarios as defined in the Long-Term Strategy Document Guidance. Further testing should be completed, considering common reference scenarios to evidence how the plan will adapt to future influencing factors like climate change.	Regulators	<p>We have significantly enhanced our adaptive planning process to improve our Long-Term Delivery Strategy (LTDS) and costed alternative scenarios.</p> <p>In Appendix G of our fDWMP, we have assessed alternative pathways for an adaptive plan, and the trigger points for changing to an alternative pathway.</p> <p>We have outlined how better information that accounts for a range of opportunities that will improve data and information, may change the plan in our Next Steps section of The Plan document.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Appendix E – Programme Appraisal</a> (sections 2 and 4)</li> <li>• <a href="#">Appendix G – Adaptive Pathways</a></li> <li>• <a href="#">Non-Technical &amp; Technical Summaries</a> (throughout)</li> <li>• <a href="#">The Plan</a> (section 6)</li> </ul>
	Our regulators also asked for more detail around how improved monitoring, including EDM and continuous water quality of outfalls, will inform adaptive pathways.	Regulators		
Regulator comment 2) Resilience	Our regulators identified that they expect us to include asset resilience both now and, in the future, to fluvial and coastal flooding, as well as power failure.	Regulators	<p>We have enhanced Technical Appendix C to include more information on our approach to fluvial resilience. This is also included in the Technical Summary, Programme Appraisal Technical Appendix and <a href="#">The Plan</a>. Updates include:</p> <ul style="list-style-type: none"> <li>• Completing an evaluation of fluvial resilience aspects.</li> <li>• Reviewing the WWNI River Flooding Resilience assessment as part of an assessment of power resilience.</li> </ul> <p>Standalone power resilience assessments are unachievable in the time between draft and final and will be addressed in cycle 2.</p> <p>Coastal resilience is relevant, even though we don’t have a coastline, due to the tidal nature of the Thames downstream of Teddington Lock. We have included joint long-term objectives between us and the EA Thames Estuary 2100 (TE2100) team in a new Resilience Technical Appendix. These objectives need to be developed and enhanced</p>	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a> (section 3)</li> <li>• <a href="#">Technical Summary</a></li> <li>• <a href="#">Appendix E – Programme Appraisal</a> (sections 5 and 6)</li> <li>• <a href="#">Appendix C – BRAVA and problem characterisation</a> (section 6)</li> </ul>

Sub-theme	You Said	Feedback Source	We Did	Documentation updated
			in line with TE2100 timelines. We expect a substantial enhancement before the next TE2100 10-year review. Some are expected to be reported in DWMP cycle 2.	<ul style="list-style-type: none"> <li>• <a href="#">Resilience – new technical appendix</a></li> <li>• Cycle 2</li> </ul>

Table 5–1 What you said and we did about protecting the environment





## Evidencing best value Affordability and bill impact



5.6. Your feedback on the affordability, bill impact and the wider programme alignment of our plan is set out in Table 5–2 along with the actions we took in response.

5.7. The main sub–themes emerging from your feedback were:

- **Impact on customer bills** – The impact which the plan might have on customer bills and our approach to trading off affordability with deliverability and ambition.
- **Regulator comments** – Additional comments from regulators that are relevant to this theme are included at the end of this table. A more detailed review of comments from our regulators is provided in Section 6.







Sub–theme	You Said	Feedback Source	We Did	Documentation updated
Impact on customer bills	You flagged that you were concerned about the potential impact that our DWMP could have on customer bills, and that we should be mindful of this when developing alternative plans or solutions.	 	<p>Bill impact is one of our most important parameters, especially in the cost–of–living crisis the UK is currently experiencing. All our scenarios, at draft and final stages, demonstrate the anticipated bill impact, irrespective of whether they are selected as a preferred plan or not. We have assessed customer bill impacts for each of the scenarios tested in our Plan, building on the work presented in Technical Appendix E – Programme Appraisal, of our dDWMP.</p> <p>We note that the work undertaken on bill impact as part of our dDWMP was missed by some of our regulators and we have redirected them to the relevant documentation.</p> <p>Our fDWMP sets out the indicative bill impacts for each of the scenarios tested:</p> <ul style="list-style-type: none"> <li>• Core Scenario – incorporating alignment of PR24 and AMP8 WINEP programme, plus flooding and resilience targets, and delivery of storm overflow reduction programme by 2045.</li> <li>• Ambitious Scenario – incorporating alignment of PR24 and AMP8 WINEP programme, plus exploration of a faster trajectory on delivery of flooding and resilience targets and delivery of storm overflow reduction programme.</li> </ul> <p>These scenarios help us explore and demonstrate that our fDWMP is striking the right balance between affordability, deliverability and ambition over the long term.</p>	<a href="#">Appendix E – Programme Appraisal</a> (sections 3, 4, 6, 7 and 8)
Regulator comment 1) Base funding vs enhancement costs	Our regulators asked us to provide information about how future risk will be addressed through our business–as–usual activities (base funding) or through enhancement funding.		<p>We have completed a scope of work to fully understand the impact of base expenditure and have integrated that into a new Technical Appendix in our fDWMP called 'What Base Buys'.</p> <p>Our enhanced understanding is also reflected in the Data Tables that are also part of our fDWMP.</p>	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a> (section 4)</li> <li>• <a href="#">Appendix E – Programme Appraisal</a></li> <li>• <a href="#">What Base Buys – new Technical Appendix</a> (sections 3, 5 and 6)</li> <li>• <a href="#">Technical Summary</a></li> <li>• Data tables</li> </ul>
Regulator comment 2) Programme Alignment (to Water Industry National Environmental Programme (WINEP), PR24, etc)	Our regulators raised concerns that the dDWMP had insufficient and unconvincing evidence for Thames Water's PR24 investment cases. We were advised to reflect on regulator comments when finalising our DWMP so that plans can be used as an evidence base for PR24.		<p>We have aligned PR24 WINEP and our Flooding enhancement Case.</p> <p>We have strengthened the narrative of our fDWMP to demonstrate alignment with other programmes, and how we have used the LTDS guidance in Programme Appraisal.</p> <p>We have industry leading examples of synergy between our clean and wastewater activities that are in the Adaptive Planning Technical Appendix and included in our preferred plan, for example Mogden South Sewer and Sevenoaks. These feature in both our DWMP and our WRMP.</p> <p>We could not align WINEP to our dDWMP as the WINEP Driver Guidance was released prior to the public consultation of the dDWMP. We have resolved this for the fDWMP.</p>	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a> (sections 1, 4 and 5)</li> <li>• <a href="#">Appendix E – Programme Appraisal</a> (throughout)</li> </ul>
	Our regulator highlighted that our ambitious goals will require significant changes to the way flood risk is managed and the mechanisms behind how projects are funded today. They would like to see a high–level road map for how to ensure future Price Reviews / AMP / WINEP cycles create the right funding environment to ensure the right projects receive funding and maximise opportunities for collaboration between partner organisations.			
	Our regulator said there was no sign of joined–up thinking with Thames Water's clean–water business in respect to the groundwater environment or WINEP investigations and catchment schemes.		<p>Groundwater requirements are not specified in the framework. We have provided enhanced data on Groundwater through the dedicated technical appendix.</p>	

Table 5–2 What you said and we did about evidencing best value



## Delivering the plan Solutions and deliverability of the plan

5.8. Your feedback on the solutions and the deliverability of our plan is set out in Table 5–3 along with the actions we took in response.





5.9. The main sub–themes emerging from your feedback were:

- **Suggestion for solutions** – Ideas for new or modified solutions we could implement across our operating area.
- **Suggestions for benefits** – Ideas to maximise the benefits of the Plan.
- **Support for solutions** – Comments on the ideas and targets for potential solutions.
- **Deliverability of solutions, in particular SuDS** – A view on how achievable the plan is.
- **Query on solution prioritisation** – We were challenged on our methods for prioritising the solutions we have.
- **Regulator comments** – Additional comments from regulators that are relevant to this theme are included at the end of this table. A more detailed review of comments from our regulators is provided in Section 6.

Sub–theme	You Said	Feedback Source	We Did	Documentation updated
Suggestion for a solution	We received many positive responses from multiple stakeholders with suggestions for additional and alternative solutions that you believe will provide benefit. The majority of stakeholders responding to the consultation provided one or more suggestions. A full list of the suggestions can be found in Appendix F.	Consultation	We have reviewed options which have been considered in ODA and compared them to suggestions made by stakeholders.  We have highlighted in our ODA new innovative ideas raised by consultees, where they were not included in our appraisal. We have either included them in our preparatory work for cycle 2 of the DWMP or provided a rationale for why they may not be suitable for implementation on our network at the moment.	<ul style="list-style-type: none"> <li>• <a href="#">Appendix D – ODA</a> (sections 2, 3,4 and 7)</li> <li>• Cycle 2</li> </ul>
Suggestions for benefits	You said there should be greater emphasis on carbon neutrality and supporting nature recovery.	Consultation	When we consulted on our Strategic Context metrics, stakeholders highlighted the emphasis on carbon neutrality. We did not set it as a planning objective (metric) but set it as a reporting metric. Our draft and final DWMP demonstrate the net effect of carbon due to activities proposed within the DWMP.  We have a used carbon as one of the indicators in our best value framework. Reporting can be found in the Programme Appraisal Technical Appendix.	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a> (section 3)</li> <li>• Cycle 2</li> <li>• <a href="#">Appendix E – Programme Appraisal</a></li> </ul>
	You told us there should be more references to citizen science as a wider societal benefit in the Plan. The Outfall Safari programme has proven that local communities are willing to engage with their river environment and this will be key for large scale monitoring which no organisation has the resources to implement on their own. Creating a network of trained volunteers not only helps to report issues quickly but also creates interest in the local community. Well organised citizen science groups can also deliver restoration tasks, species surveys and water quality monitoring. Other benefits include wellbeing, access to green space and education.	Consultation	The actions in our Plan will result in a wide range of benefits for our customers, our stakeholders and the environment. We welcome your ideas for new benefits, some of which we note already feature in our Plan. We will consider other suggested benefits in our next DWMP (cycle 2).	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a></li> <li>• Cycle 2</li> </ul>
	Other benefits that some stakeholders wanted to see feature more prominently in the Plan: <ul style="list-style-type: none"> <li>• Agriculture and farming benefits e.g., to store and slow flows across agricultural land.</li> <li>• Health and wellbeing benefits linked to ‘natural’ water and Green Infrastructure in developments.</li> </ul> Property–based solutions which attenuate peak runoff whilst also providing water resources to alleviate demand on mains water supply (e.g., water storage tanks / butts).	Consultation		

Sub-theme	You Said	Feedback Source	We Did	Documentation updated
Suggestions for benefits (continued)	You thought there should be further monitoring downstream of sewage treatment works.	 Consultation	<p>We have included the Environment Act requirements on water quality monitoring as a specific scenario in our Programme Appraisal. We note that the details are yet to be determined by regulators. We have made assumptions on a rollout of monitoring in our Nest Steps section of The Plan.</p> <p>The Outfall Safari programme developed by ZSL (Zoological Society of London) for polluted surface water outfalls has been an excellent success and demonstrates how collaborative effort between ourselves and local stakeholders can effectively tackle pollution. We also have trials underway as part of the CastCo project in the River Pymmes and Dollis Brook to equip citizen scientists with the tools and knowledge needed to collect credible water quality data that can be used to evidence the need for action. This is being led by Thames21 and The Rivers Trust. We also have an established track record in supporting local groups in collecting the necessary data to support applications for bathing water designation. The successful designation of the Wolvercote stream at Oxford Port Meadow, Oxford was supported by data collected by citizen scientists and analysed at our laboratories.</p>	<ul style="list-style-type: none"> <li>• Cycle 2</li> <li>• <a href="#">The Plan</a> (section 6)</li> </ul>
Customer support for our proposed solutions	<p>Approximately 7 in 10 of the consultation responses supported our target for increasing the use of SuDS. The consultation indicated that we have high levels of support for the use of the solutions we proposed in our dDWMP:</p> <ul style="list-style-type: none"> <li>• “All the solutions are positive and help to build capacity in the network”</li> <li>• “We support the proposed solutions”</li> <li>• “These solutions seem broadly right”</li> <li>• “We are encouraged to see a good balance of green and grey infrastructure and in the London Strategy prioritisation of the use of SuDS over grey engineering”</li> </ul>	 Customer survey	No action required. We welcome the positive feedback we have received from customers.	<ul style="list-style-type: none"> <li>• No action required</li> </ul>



Sub-theme	You Said	Feedback Source	We Did	Documentation updated
Deliverability of SuDS	<p>You expressed concerns around the practicality of implementing such an ambitious SuDS plan:</p> <ul style="list-style-type: none"> <li>The DWMP includes a marked step change in the delivery of SuDS compared to our previous level of SuDS delivery. The plan could include more detail on how this change in pace of delivery will be achieved and how the number of opportunities required to meet the DWMP targets will be identified.</li> <li>There is insufficient information within the dDWMP to give confidence that the scale of roll out adopted within the preferred plan approach will be achievable and what impact it may have on the delivery of the DWMP goals if it is not.</li> <li>Some stakeholders suggested loading the plan more evenly to achieve more SuDS in earlier years of the plan.</li> <li>Where SuDS have been prioritised as a strategy for mitigating pressure on the sewers there is a concern around the space available and the number of opportunities for retrofitting in London where land availability may be constrained due to the streetscape and housing stock.</li> <li>Although the solution is outside of the scope of our DWMP, challenges regarding the ownership and maintenance of SuDS were flagged by many as a potential issue for future management of a network which includes more SuDS.</li> <li>The Environment Agency said “It is important that the right blend is set out within the plan to ensure that at future Price Review / AMP / WINEP cycles funding is best aligned to the right programmes. Our experience with PR19 is that the shift of funding from direct property alleviation to generic SuDS roll out has had a detrimental impact on our ability to collaborate with you. The proposed ‘go steady’ delivery approach risks an environment where, should it not be achievable at the scale anticipated, a significant shift in approach could be required at a late stage within the DWMP, putting the goals at risk.”.</li> <li>Thames Water should look at how they can increase funding beyond £5m to resource partners to develop SuDS schemes to achieve the delivery aspirations in this plan.</li> </ul>	  (Principally the GLA)	<p>The DWMP is a strategic plan as opposed to a delivery plan but for our fDWMP we have included further detail of how we intend to overcome SuDS delivery constraints in the technical appendix for SuDS delivery. There are many promising trials and projects underway that aim to break down barriers to delivery.</p> <p>We have estimated the scale of SuDS in London using a bespoke SuDS opportunity mapping tool (Atkins SuDS Studio), to inform the feasibility and scale of our target. We recognise that some partnership organisations struggle with ownership and maintenance of SuDS while others with experience in delivery are more comfortable. We will continue to work with the industry in improving knowledge and understanding as we have done in the London Strategic SuDS Pilot Study. We also welcome the government decision to enact Schedule 3 of the Flood and Water Management Act 2010 and believe this will assist with the ownership and maintenance of SuDS.</p>	<ul style="list-style-type: none"> <li><a href="#">The Plan</a> (sections 3 and 6)</li> <li><a href="#">Delivery of SuDS and nature-based solutions – new Technical Appendix</a> (section 6)</li> </ul>
Query on solution prioritisation	<p>You suggested ways which we could adapt our options appraisal process / solution prioritisation. These included:</p> <ul style="list-style-type: none"> <li>Prioritising catchment wide and nature-based solutions over traditional engineering approaches.</li> <li>Prioritisation should include sensitive areas of groundwater alongside rivers and wetlands.</li> </ul>	 	<p>We have considered feedback provided on how we could prioritise solutions. We have collated these potential changes to the approach and will include development of them in our preparatory work for our next DWMP (cycle 2).</p> <p>Generally, nature-based solutions would be expected to provide multiple benefits and as such are selected over grey solutions, where costs are otherwise broadly similar. Sensitive groundwater bodies will be explored further in cycle 2; however, for cycle 1 we have noted the potential benefits of infiltration reduction measures to potential exfiltration from sewers into to the groundwater.</p> <p>Options Development in cycle 1 of the DWMP was our first large scale attempt. We have a series of lessons learned from doing it once and welcome stakeholders’ suggestions to improve this in future cycles.</p>	<ul style="list-style-type: none"> <li>Cycle 2</li> </ul>


Sub-theme	You Said	Feedback Source	We Did	Documentation updated
Regulator comment 1) Delivery of multiple benefits	We received feedback from our regulators that we should provide more evidence around the costs and benefits of solutions – in particular schemes that deliver multiple benefits. They also asked us to provide evidence on why alternative options were discounted.		We have included further detail in our fDWMP on the cost and benefits of solutions, this includes: <ul style="list-style-type: none"> <li>• How multiple benefits have been considered in determining the best value.</li> <li>• Evidence where alternative options have been discounted.</li> </ul> This will also be addressed by the Data Tables in the fDWMP and the narrative about the Preferred Plan in the Plan.	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a> (tables in sections 3 and 5)</li> <li>• <a href="#">Appendix E – Programme Appraisal</a> (sections 2, 4 and 7)</li> <li>• <a href="#">Appendix D – ODA</a> (specifically the Deephams case study within this)</li> </ul>

Table –3 What you said, and we did, about delivery of our plan

## Enhancing the plan Technical clarifications and ease of navigation

5.11. Your technical clarifications and ideas for document refinement are set out in Table 5–4 along with the actions we took in response.

5.12. The main sub–themes emerging from your feedback were:

- **Technical query on the plan** – Clarifications or queries on our approach to the DWMP or our draft plan.
- **General feedback** – A wide range of miscellaneous comments.
- **Catchment feedback** – Specific information about an issue, opportunity or historical event in our operating area.
- **Lack of detail** – Identification of areas of the plan which could have included more supporting information.
- **Regulator comments** – Additional comments from regulators that are relevant to this theme are included at the end of this table. A more detailed review of comments from our regulators is provided in Section 6.

Sub–theme	You Said	Feedback Source	We Did	Documentation updated
Technical query on the plan	<p>In total we had 130 technical queries / clarifications on the plan and these covered a wide range of topics. Each technical query on the plan was highly specific, some examples are included below:</p> <ul style="list-style-type: none"> <li>• Surrey County Council asked why our non–London radar plot showed a decrease in Natural Capital Impact from the resilient options when compared to the maximum benefit option and why this was different to the radar plot for London.</li> <li>• The Environment Agency asked if sufficient consideration of surface geology had been considered in the assumptions modelled for reductions of inflows to sewers from infiltration SuDS.</li> </ul>		<p>We have updated the narrative of the fDWMP to ensure that common clarifications are answered within it. This has included:</p> <ul style="list-style-type: none"> <li>• We have updated the narrative of the Plan to explain differences between the radar plots within, and outside of, London.</li> <li>• We have updated the narrative in our plan to set out the variables we considered when modelling SuDS.</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a></li> </ul>
General feedback	<p>We received a total of 87 general feedback comments from a mixture of stakeholders including local authorities, customers, a water company and our regulators which covered a wide range of topics, including:</p> <ul style="list-style-type: none"> <li>• “Hopefully as the DWMP progresses, the experience of working with partners and using new techniques can be incorporated into future iterations that will make the costs and outcomes more certain.” Kent County Council.</li> <li>• “We acknowledge that surface water removal is a complex issue as it is often location and problem specific” Affinity Water.</li> <li>• “We welcome your proposal to look at resilience to flooding in future DWMPs to not only at 1 in 50 years but also a high pathway of 1 in 100 year and a low pathway of 1 in 30 years. We are encouraged by this approach which will allow Thames Water to use adaptative approaches to maintain a focus on the longer term and at the same time, to work with others taking a whole system view to analyse risks, and identify, develop, fund and deliver schemes to improve resilience and wider benefits.” Environment Agency.</li> </ul>		<p>We welcome your wide–ranging general feedback on our dDWMP. It has not all required updates to our fDWMP, e.g., where you made positive comments, however, in some instances your general feedback has provided observations that have led to updates, including:</p> <ul style="list-style-type: none"> <li>• The Environment Agency observed that the Plan provided three scenarios regarding storm overflows and that these targets focused on the near term. In response, our fDWMP includes proposals to meet all targets set in the Storm Overflow discharge reduction Plan but also go beyond this by providing a plan that achieves 50% reduction in spill duration by 2030.</li> <li>• The Environment Agency also provided us with details of scenarios that are high priority in terms of groundwater protection. We have used this information to update our CSPs.</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a> (section 3)</li> <li>• CSPs</li> </ul>
Catchment feedback	<p>We received specific feedback about catchment issues or potential partnership schemes as part of the consultation. The catchment feedback was provided by both L1 and L2 stakeholders. The types of feedback we received included:</p> <ul style="list-style-type: none"> <li>• Identification of risk areas</li> <li>• Historic events which could be considered in the DWMP</li> <li>• Potential partnership schemes</li> </ul>		<p>We have updated our CSPs and our partnership working approach.</p> <p>We have engaged with all our stakeholders who contributed opportunities and fully refreshed the opportunity register with removals as well as additions. This has increased the register from circa 100 to circa 120 opportunities.</p> <p>We have built a maturity assessment and applied that to all the opportunities, allowing us to understand which ones are likely to be successful if promoted in the near future, and which need more work to mature to schemes. All these opportunities have been added to our DWMP portal. We are considering further development of some mature opportunities to get them ready for delivery from 2025.</p>	<ul style="list-style-type: none"> <li>• CSPs</li> <li>• <a href="#">Partnership Opportunities &amp; Working – new technical appendix</a> (sections 4, 5, and 6)</li> <li>• DWMP Portal</li> </ul>



Sub-theme	You Said	Feedback Source	We Did	Documentation updated
Some parts of the plan lack detail	<p>Some stakeholders flagged that for some of the questions asked they were not able to answer as fully as they would have liked because they would have preferred to be presented with more information. This was especially true for the questions which sought views on the resilient plan and whether we have struck the right balance between affordability, deliverability and ambition. Examples of this feedback include:</p> <ul style="list-style-type: none"> <li>• “It is unclear how these figures were generated and what interventions assumed for this plan to be delivered.”, Royal Greenwich Council</li> <li>• “This is hard to decipher from the information provided as it is not transparent how much typical households would see added to their bills to pay for the upgrades.”, Reigate and Banstead Borough Council</li> <li>• “There is a lack of a detail around your approach to asset health and maintenance, which is needed for final DWMP”, Ofwat.</li> </ul>		<p>We have increased the amount of information available for the preferred plan in the fDWMP to demonstrate what it aims to deliver, and restructured parts of it to make information clearer and easier to find, e.g., by providing more signposting (cross-references) to other parts of the plan as necessary.</p>	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a> (section 3)</li> </ul>
Regulator comment 1) Ease of navigation of the plan	<p>We received mixed feedback from our regulators on how easy/difficult the plan was to digest and navigate, some examples include:</p> <ul style="list-style-type: none"> <li>• “We really like the customer version of the plan, in both format and content e.g. what can customers do...Even the technical version of the plan is written in a way that is clear and understandable.” CC Water</li> <li>• “We consider that your dDWMP is generally well structured, well developed and includes the expected documentation.” Ofwat</li> <li>• “The report was hard to navigate in places and the variation in terminology (i.e., referring to options that are proposed in the DWMP as ‘solutions’ in the early part of the report and then switching to the term ‘Generic Sub-options’) does mean the report is not always easy to follow.” Environment Agency</li> </ul>		<p>We acknowledge that our DWMP is rich in detail as we seek to meet all the requirements set out in the DWMP Framework. We have taken the opportunity to refine technical content and description in the DWMP documentation to make our plan as clear as possible.</p> <p>Where new information has been added between draft and final, we have ensured it is concise and necessary to avoid the fDWMP becoming overly large.</p>	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a></li> <li>• Summary documents</li> <li>• All Technical Appendices</li> </ul>

Table 5–4 What you said and we did about our enhanced plan





## Working together Collaboration to achieve multiple benefits



5.13. Your feedback on our partnership working is set out in Table 5–5 along with the actions we took in response.

5.14. The main sub–themes emerging from your feedback were:

- **Supportive of partnership working** – Positive responses about our approach to partnership working.
- **Suggestion for partnership working** – Ideas for how we can improve our approach to working with our partner organisations in our future work on the DWMP.

Sub–theme	You Said	Feedback Source	We Did	Documentation updated
Supportive of partnership working	We found stakeholders agreed with us that partnership working will have a significant impact on our capability to meet our DWMP objectives.	Consultation	Positive feedback, no action required. We continue to actively support partnership working.	<ul style="list-style-type: none"> <li>• No action required</li> </ul>
Suggestion for partnership working	You thought we could improve the integration across all Risk Management Authorities (RMAs) so opportunities for partnership working could be identified with greater ease. Suggestions included improved sharing of information e.g., flood history and monitoring data for sewers both during flood events and outside those events, and managing the opportunity database as a live, regularly updated feature of the DWMP.	Consultation	<p>We have developed additional content to sit within the fDWMP which will demonstrate how we believe partnership working can be made more successful. The additional content includes:</p> <ul style="list-style-type: none"> <li>• Greater detail about our planned approach for partnership working in the next cycle of the DWMP.</li> <li>• Further guidance and support to help partners develop and submit applications.</li> <li>• Details of our collaborative process for helping partners develop applications. (Continued on following page).</li> <li>• Proposals for future data sharing with our stakeholders to better identify opportunities for mutual objectives and partnership schemes in our next DWMP (cycle 2).</li> <li>• We have developed a proposal document for data sharing to help identify and prioritise partnership potential.</li> </ul> <p>We recognise there have been challenges from stakeholders around the deliverability of our plan, particularly with regards to SuDS (see Table 5–3), and also how we will manage the issues around ownership, maintenance and time and resources of partner organisations which may be a barrier to their contributing to schemes. In providing this additional support and clarity we hope the number of opportunities and the likelihood that they will progress will increase.</p> <p>We have also considered these challenges in developing the pace of the plan, ensuring that we allow for sufficient time early in the delivery programme to understand the challenges and to develop the innovation that will be essential to deliver such an ambitious plan.</p> <p>A new technical appendix on Partnership Opportunities &amp; Working has been created for the fDWMP.</p>	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a></li> <li>• Preparatory work for our next, cycle 2, DWMP</li> <li>• <a href="#">Partnership Opportunities &amp; Working – new technical appendix</a> (sections 3, 4 and 6)</li> <li>• <a href="#">Delivery of SuDS and nature-based solutions – new Technical Appendix</a> (section 6)</li> </ul>
	Although we have developed our objectives in consultation with stakeholders as part of the Strategic Context for the DWMP, we received feedback that a greater number of mutual objectives would be welcomed to make working in partnership easier.	Consultation		
	You said that at present, stakeholders come to Thames Water to apply for funding, but this could be reversed, with Thames Water approaching stakeholders as a partnership lead. We also received feedback that a 2–stage funding process would also be welcomed where stakeholders received financial support in developing their initial proposal to put forward to Thames Water.	Consultation		
	You highlighted the limited capacity and resources of stakeholder organisations to support a significant amount of partnership schemes (i.e., SuDS) alongside statutory responsibilities.	Consultation		
	Provide guidance to RMA to support the partnership working process e.g., applying for grants, expert information,	Consultation		
Regulator comment 1) likelihood of delivery	We received feedback from our regulators that we should provide clarity on the likelihood of delivering partnership schemes in the future and the potential scale of co–funded delivery.	Regulators		

Table 5–5 What you said, and we did, about partnership working



## Valuing your input

### Stakeholder engagement



5.15. Your feedback on our stakeholder engagement is set out in Table 5–6 along with the actions we took in response.

5.16. The main sub–themes emerging from your feedback were:

- **Suggestions for stakeholder engagement** – Ideas for how we can improve our approach to working with stakeholders in our future work on the DWMP.
- **Increase in data sharing** – Suggestions for how we could improve the ways we share data.

Sub–theme	You Said	Feedback Source	We Did	Documentation updated
Suggestion for stakeholder engagement	You said that for the next cycle of the DWMP, engagement should start early to maximise opportunities to coordinate, link into local plans and allow interested groups to respond and provide feedback.	Consultation	<p>This document forms part of the fDWMP and provides an overview of the stakeholder engagement completed between dDWMP and fDWMP.</p> <p>We have incorporated some of the suggestions we have received into an updated Stakeholder Engagement Plan for the next DWMP cycle, this includes:</p> <ul style="list-style-type: none"> <li>• A projected timeline of stakeholder engagement for our next DWMP (cycle 2), which includes early dialogue with interested parties, particularly around partnership schemes and planning objectives, which will maximise opportunities to work on solutions together.</li> <li>• A plan for different types of engagement sessions at appropriate stages of the plan development (i.e., face to face and digital).</li> <li>• A method for updating stakeholders on DWMP progress. This will include an active database which contains partnership opportunities to be explored and developed through the DWMP, which will be updated as solutions in the DWMP are delivered, and new opportunities present themselves.</li> </ul> <p>We have completed this work to ensure that we capture and act on the suggestions which many of our stakeholders made during the consultation.</p> <p>The virtual engagement sessions we ran will be repeated in future DWMP cycles.</p>	<ul style="list-style-type: none"> <li>• You Said. We Did. Consultation Summary Report (section 5)</li> <li>• Cycle 2</li> <li>• <a href="#">Partnership Opportunities &amp; Working – new technical appendix</a></li> </ul>
	You highlighted that partnership working is a key pillar of the plan, but that partners have not yet been identified for all schemes, and what the impact on roles and resources may be in delivering them.	Consultation		
	The virtual engagement sessions we ran were well received and should be continued. You said DWMP workshops that were run for targeted stakeholders as part of the consultation process would be better earlier in the consultation period.	Consultation		
	You said we should expand our reach when engaging stakeholders around our targets and planning objectives.	Consultation		
	You said we should maintain a record of schemes delivered as part of the DWMP which can be accessed by stakeholders. This will help to build confidence in the plan.	Consultation		
Increase in data sharing	You said we should provide information on duration and volume of discharge available on as near to a real–time basis as possible, so that users of rivers can make informed decisions as their short–term usage of the rivers.	Consultation	<p>Changes we have made to our fDWMP in response to your comments on data sharing include:</p> <ul style="list-style-type: none"> <li>• Where it is available and can be shared publicly, we have added additional data to our DWMP portal and to our practitioners' portal.</li> <li>• We are continually striving to ensure our data is up to date, reflecting the latest status of our assets on the ground. Several datasets on our portal have been updated between the draft and fDWMP.</li> </ul> <p>We have also incorporated some of the suggestions we have received about data sharing into an updated Stakeholder Engagement Plan which we will put into practice in cycle 2. This includes consideration of how we can share real time information more widely and what GIS asset data we can share. Near real time data is available for storm overflows from January 2023 on our website.</p>	<ul style="list-style-type: none"> <li>• <a href="#">The Plan</a> (sections 1 and 5)</li> <li>• Cycle 2</li> </ul>
	You said there is no transparency of data regarding the sewer lining solution.	Consultation		
	You told us collaboration with different sectors needs to be improved to reduce the costs and disruption to London. The DWMP will need to have an ongoing live project system.	Consultation		
	You said that the creation of online portals and including one for practitioners is useful and holds more information than the Strategic Catchment Plans, but there has been limited progress in GIS data sharing. Stakeholders must be able to interrogate the relevant data, against data they hold if this is to genuinely be a joint plan, as government aspires to.	Consultation		
	You said we should map sewage infrastructure and make this information available to stakeholders.	Customer survey		
	You said we should ensure your asset data is up to date and easily accessible to RMAs for investigative purposes such as S19 reports, customer enquiries, capital scheme delivery, etc.	Consultation		
	Thames Water have a relatively good level of foul sewer modelling, but you said there is a lack of surface water modelling to predict potential capacity constraints. Greater sharing of this and historic flood issue data, may assist scheme identification and prioritisation.	Consultation		

Table 5–6 What you said and we did about valuing your input

## 6. Responses from our regulators

- 6.1. Our regulators gave us feedback that was relevant to the main consultation themes identified in Section 4. This feedback from our regulators, along with our responses to it, has been presented in Section 4 and is summarised in Table 6–1.
- 6.2. Our regulators also provided detailed technical feedback that was outside of the topics covered by the main consultation response themes set out in Section 5. A selection of this extra feedback, and our responses to it, is summarised in the following sub-sections. All of the feedback from our regulators is presented in full in Appendix H alongside our individual responses to each of the points raised.

### CC Water

- 6.3. Key points raised by CC Water that are not summarised in Section 5 or Table 6–1 Summary of feedback from regulators:
- **You said:** The plan should investigate undertaking sensitivities on customer prioritisation to gauge the extent to which this would have any discernible impact on the preferred plan.  
**We did:** Our customer research has provided us with feedback from customers on our dDWMP. The findings are summarised in Appendix D of this document which is part of the fDWMP. We did not undertake specific customer priority sensitivity analysis, yet the results are quite distinct, and our belief is that overall, customer views would need to noticeably change, to make any difference to the preferred plan. We will consider customer sensitivity analysis on customer prioritisation as part of cycle 2.
  - **You said:** It should be referenced in the plan that the DWMP is only one area of planned spend over the next 25 years. Do stakeholders' or consumers' views change on their preferred plan when these other layers are added. How does it impact their perception of affordability?  
**We did:** Understanding changes in customer views can only be done once PR24 customer research is complete. Results are not available in time for our fDWMP.

### Environment Agency

- 6.4. Key points raised by the Environment Agency that are not summarised in Section 5 or Table 6–1 Summary of feedback from regulators:
- **You said:** There should be more detail in level 2 plans, for example: where proposed solutions will be delivered such as the proposed 1,060km of sewers that are to be relined to reduce infiltration along with manhole sealing.  
**We did:** At dDWMP stage, we provided a view of our proposals for a selected number of catchments at level 3. Additional detail is provided in our level 3 plans for all catchments which are included within our fDWMP.
  - **You said:** The SEA, although not required for cycle 1, could be improved, e.g., providing a scoping study and more details about the baseline and impacts.  
**We did:** Engagement was undertaken with Natural England and other stakeholders regarding the level of detail to be considered at the strategic plan level. We provided a technical note which set out the methodology, which was reviewed by these stakeholders before the dDWMP was completed. Following further engagement post consultation, the Environment Agency has confirmed

that the methodology applied is proportionate and appropriately precautionary, recognising the infancy of option development for the strategic plan level.

### Greater London Authority

6.5. Key points raised by the Greater London Authority (GLA) that are not summarised in Section 5 or Table 6–1 Summary of feedback from regulators:

- **You said:** The DWMP is broken down into CSPs which are useful, but still outline delivery within Water Resource Zones (WRZs). These are too large in scale to provide sufficient local detail, for example it does not name rivers, provide combined sewer overflow (CSO) references, and does not show local authority or other catchment boundaries in these plans.

**We did:** The CSPs present the Strategic Planning Units (not WRZs – which are specific to the WRMP), that are based on the Thames Regional Flood and Coastal Committee (TRFCC) areas outside of London, and the catchments of the very large sewage treatment works in London. The aim of presenting information at this level of granularity is 'to describe strategic drivers for change (relevant at the level 2 strategic planning area scale), as well as facilitating a more strategic level of planning above the detailed catchment assessments. The draft CSPs do then drill down further to our sewage treatment works catchments of outside London, and all of the London risk zones. The individual catchment or risk zone pages show and name the rivers, as well as all of the storm overflow locations. All of our stakeholders or co-creators are named and have been involved in creating the DWMP and will be invited to continue to participate in the DWMP process as we review and reassess performance in future DWMP cycles. We will consider this comment further in cycle 2 to see how the information can be better communicated with all stakeholders.

- **You said:** Section 14 Learning for cycle 2 of the Draft Plan is very limited in detail. More detail should be provided on the data needed and how it will be collected in the next AMP period to improve future iterations of the DWMP.

**We did:** Having completed the consultation, we are now able to confirm what is part of our fDWMP and what we are including in our cycle 2 DWMP. Section 5 of this document identifies our cycle 2 actions and our fDWMP includes a section on 'Learning for cycle 2' which has been updated to reflect our latest position.



## Natural England

6.6. Key points raised by Natural England that are not summarised in Section 5 or Table 6–1  
Summary of feedback from regulators:

- **You said:** The HRA needs a number of deficiencies rectified, for example: 1) screening should be included, 2) a hydrological survey should be undertaken to understand the hydrological links to each designated site within the scope of the DWMP and 3) an individual assessment of adverse impacts should be included that compares risk against specific mitigation actions or as an in–combination assessment.

**We did:** We have had further engagement with Natural England since the draft publication and NE have subsequently confirmed that the methodology applied is proportionate for the stage that DWMP is at, recognising the infancy of option development for the strategic plan level.

- **You said:** The SEA needs a number of improvements, for example it should more fully assess the natural and social capital of the dDWMP options, and it should contain a scoping stage.

**We did:** We have had further engagement with Natural England since the draft publication and NE have subsequently confirmed that the methodology applied is proportionate for the stage that DWMP is at, recognising the infancy of option development for the strategic plan level.

## Ofwat

6.7. Key points raised by Ofwat that are not covered in Section 5 or Table 6–1 Summary of feedback from regulators:

- **You said:** Provide details of any third–party assurance of the DWMP plan or any contributing processes.

**We did:** A third party assurer (Mott MacDonald) has assessed the fDWMP and an assurance statement has been added as a new technical appendix to the fDWMP.

- **You said:** The fDWMP should include details of the feedback provided from the dDWMP consultation

**We did:** This new technical appendix, ‘You Said. We Did’, has been added to the fDWMP.

### Our regulators said:

### We did:

<p>Interaction with base funding</p>	<p>The DWMP needs a clearer summary of how future risk will be addressed through Thames Water’s business as usual activities (base funding) or through enhancement funding.</p>	<p>We have completed a scope of work to fully understand the impact of base expenditure and have integrated that into a new Technical Appendix in our fDWMP called 'What Base Buys'. Our enhanced understanding in this area is also to be reflected in the Data Tables that are part of our fDWMP. For further info see Table 5-2, regulator comment 1.</p>
<p>Adaptive planning</p>	<p>A reasonable understanding of the aims of adaptive planning approach is demonstrated, but it is not fully applied across all areas of the plan. An adaptive planning approach should be applied to all areas of the plan, demonstrating:</p> <ul style="list-style-type: none"> <li>• How the Ofwat Common Reference Scenarios have been considered.</li> <li>• How improved monitoring will inform adaptive pathways</li> </ul>	<p>We have significantly enhanced our adaptive planning process to improve our Long-Term Delivery Strategy (LTDS) and costed alternative scenarios. In Appendix G of our fDWMP we have assessed alternative pathways for an adaptive plan and the trigger points for changing to an alternative pathway. For further info see Table 5-1, regulator comment 1.</p>
<p>Asset resilience</p>	<p>The DWMP needs further detail on the resilience of your assets. It is essential that as well as the risk of flooding from your assets, risks to your own assets are also understood and planned for, including how you would be impacted now and in the future by fluvial, coastal, flooding or power failure.</p>	<p>Technical Appendix C in the fDWMP includes more information on our approach to fluvial resilience. Power resilience assessments are unachievable in the time between draft and final and will be addressed in cycle 2. For coastal resilience, we have included joint long-term objectives between us and the EA Thames Estuary 2011 (TE2100) team, in the new Resilience Technical Appendix. For further info see Table 5-1, regulator comment 2.</p>
<p>Alignment of plans</p>	<p>Demonstrate how the DWMP aligns with other key wastewater programmes, for example: the PR24 business plan and WINEP obligations set out in the Defra Storm Overflows Discharge Reduction Plan. Set out a road map showing how future Price Reviews / AMP / WINEP cycles will create the right funding environment to ensure the right projects receive funding.</p>	<p>Our dDWMP was developed before the current WINEP obligations were identified and our thinking on PR24 was still at an early stage. Our fDWMP now fully aligns across these and other water industry planning programmes, including LTDS, WRMP and the Defra Storm Overflows Discharge Reduction Plan, which are all important drivers for planned investment in AMP8 and AMP9. For further info see Table 5-2, regulator comment 2.</p>
<p>Costs and benefits of solutions</p>	<p>The DWMP should provide more evidence around the costs and benefits of solutions - in particular schemes that deliver multiple benefits, how they compare to alternatives and how this has evolved since the dDWMP.</p>	<p>We have brought out the costs, benefits, and particularly multiple benefits, in our fDWMP. We have done this by evidencing the best value and rationale behind our preferred plan, i.e., the why, not just the how. For further info see Table 5-3, regulator comment 1.</p>
<p>Climate change</p>	<p>The plan is not overly ambitious in planning for climate change. Sewer and storm overflows are covered, but other climate impacts are not. Carbon is considered (embodied and sequestered) but is listed as 'lower priority' based on customer feedback. The fDWMP should demonstrate how the whole plan would adapt to climate change and assess the effects of climate change on protected habitats and species that are vulnerable to impacts related to Thames Water assets.</p>	<p>Our dDWMP and fDWMP have both demonstrated net carbon emissions linked to the plan’s activities. We have assessed alternative pathways for an adaptive plan considering the impact of a wider range of climate change scenarios, and their associated trigger points, on our DWMP. These are detailed in Appendix G of our fDWMP. For further info see Table 5-3, sub theme: suggestions for benefits (carbon neutrality) and Table 5-1, regulator comment 1 (adaptive planning). Impacts of climate change on protected habitats will be considered for Cycle 2; n.b., this will be statutory; we may not have the final decision on what is included.</p>

\*Defra Storm Overflows Discharge Reduction Plan and report on feasibility of elimination of discharges from storm overflows Presented to Parliament pursuant to section 141A(8) of the Water Industry Act 1991 and section 84(3) of the Environment Act 2021 – [Storm\\_Overflows\\_Discharge\\_Reduction\\_Plan.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/114444/Storm_Overflows_Discharge_Reduction_Plan.pdf)

Table 6–1 Summary of feedback from regulators

## 7. Conclusion

- 7.1. We published our dDWMP for public consultation on Thursday 30 June 2022. The consultation closed on Monday 26 September 2022.
- 7.2. This document summarises what **you said** about our dDWMP and what **we did**, in response to your feedback to develop our fDWMP.
- 7.3. In total we received 95 responses to the public consultation, 1,004 responses to our household customer surveys and 300 responses to our non-household customer survey. These came from a wide range of stakeholders including regional and local government, members of parliament, environmental organisations, local community organisations, catchment partnerships and individual members of the public.
- 7.4. We have summarised your consultation responses around six clear repeated themes that emerged following our detailed review of your feedback:
- Protecting the environment – Level of ambition and pace of our plan.
  - Evidencing best value – Affordability and bill impact.
  - Delivery – Solutions and deliverability of the plan.
  - Enhanced plan – Technical clarifications and ease of navigation.
  - Partnership working – Collaboration to achieve multiple benefits.
  - Valuing your input – Stakeholder engagement.
- 7.5. A summary of what you said and what we did for each of these themes is provided in the Executive Summary (Figure C) and further details are given in Section 4, Section 5 and Section 6 of this document. Overall, you supported our preferred plan, the types of nature-based solutions we're proposing and our partnership working approach. You challenged us to be more ambitious, to bring our programme forward and to reduce the bill impact on customers. You offered ideas for new or amended solutions, for ways we could maximise benefits and for enhancements to our consultation approach. You also asked for more details about the resilience of our assets, how the plan will be funded and how we might adapt the plan for future influencing factors like climate change.
- 7.6. In response to your feedback, we have made numerous changes to our fDWMP which are set out in detail within this report. They include updates to the suite of documents that make up our fDWMP, additions to the content we plan to include in our next DWMP (cycle 2: 2030–2055) and refinements to the processes that will inform how we develop our next DWMP. The principal ways in which the consultation has enabled us to enhance our fDWMP are outlined below on Figure 7–1.



**Figure 7–1 How the consultation has enabled us to enhance our fDWMP**


We are extremely grateful for every piece of valued feedback provided during the consultation on our dDWMP and would like to extend our gratitude to all who took the time to read our dDWMP and respond to the consultation.







## Appendix A – Email advising of the public consultation



### Help shape the future of our drainage and wastewater systems

Hello,

Today is the launch day of our draft Drainage and Wastewater Management Plan.

Take this opportunity to have your say on the plan that will help shape the future of our drainage and wastewater systems for the next 25 years.

We want to thank everyone for working with us to develop the plan together and we really hope it meets your expectations. Here is the link to our public consultation.


[Have your say](#)

The consultation will run for 12 weeks ending Thursday 22 September.

For a full view of all the documentation surrounding our plan, including access to interactive mapping allowing you to see how your local area is impacted, view the [Drainage and Wastewater Management Plan](#) webpage.


I would like to thank you in advance for providing feedback, questions and challenge to us, I look forward to hearing your views. If you have any queries surrounding the consultation or our webpage, please email us at [DWMP@thameswater.co.uk](mailto:DWMP@thameswater.co.uk)

Kind regards,




"Thank you to everyone who has contributed to this shared plan. Your involvement has been so fundamental to its development and will continue to be critical to the successful delivery of the DWMP"

**Sarah Bentley**  
Thames Water CEO



**Richard Aylard**  
Director of Sustainability



## Appendix B – List of stakeholders who responded

An email was sent to stakeholder organisations (see Appendix A). The mailing list comprised local authorities, catchment partnerships, environmental groups, water companies, regulators, parish councils and individuals who had expressed an interest in the public consultation.

The following table comprises the stakeholder organisations who responded to the consultation. Individuals have not been included in the list.

Stakeholder Type	Stakeholder
Catchment Partnerships	Brent Catchment Partnership
	Campaign to Protect Rural England (CPRE) Oxfordshire
	Catchment Partnerships in London Members (CPIL)
	Kennet Catchment Partnership
	Loddon Catchment Partnership
	London Lea Catchment Partnership
	Luton Lea Catchment Partnership
	Maidenhead to Teddington Catchment Partnership
	Marsh Dykes and Thamesmead Catchment Partnership
	Ock Catchment Partnership
	Roding Beam and Ingrebourne Catchment Partnership
	South Chilterns Catchment Partnership
	Thame Catchment Partnership
	Wandle Catchment Partnership
Wey Landscape Partnership and River Mole Catchment Partnership	
Environmental Group	Barnes Common Limited – Partner of Richmond Council and WWT in the Innovative Flood Resilience project for Beverley Brook catchment
	Chiltern Society
	Colne Catchment Action Network
	Colne Valley Fisheries Consultative
	Cotswolds Rivers Trust
	Friends of the River Crane Environment (FORCE)
	Friends of the River Mole
	Letcombe Brook Project
	Loddon Fisheries and Conservation Consultative
	Ravensbourne Catchment Improvement Group (RCIG)
	River Chess Association
	Southeast Rivers Trust
	Thame Valley Fisheries Preservation Consultative
Thames21	
Level 1 Stakeholders	CAMELLIA (Community Water Management for a Liveable London). NERC funded project to improve the management of water in London. Academic partners: Imperial College London; University College London; University of Oxford; British Geological Survey.
	LODEG London Drainage Engineers Group
	Port of London Authority
	Thames Regional Flood and Coastal Committee
	Transport for London



Local Authority	Basingstoke and Deane Borough Council
	Buckinghamshire County Council
	Elmbridge Borough Council
	Essex County Council
	Gloucestershire County Council
	Guildford Borough Council
	Hampshire County Council
	Kent County Council
	Oxfordshire County Council
	Reigate and Banstead Borough Council
	Royal Borough of Greenwich
	Royal Borough of Kensington and Chelsea
	Royal Borough of Windsor and Maidenhead
	Sevenoaks District Council
	South Oxfordshire District Council
	Surrey County Council
	Three Rivers District Council
	Vale of White Horse District Councils
	Warwickshire County Council
Waverley Borough Council	
Wokingham Borough Council	
Local Authority (London Boroughs)	London Borough of Barking and Dagenham
	London Borough of Camden
	London Borough of Enfield
	London Borough of Hammersmith and Fulham
	London Borough of Hounslow
	London Borough of Lambeth
	London Borough of Lewisham
	London Borough of Merton
	London Borough of Newham
	London Borough of Richmond upon Thames
	London Borough of Southwark
	London Borough of Waltham Forest
London Borough of Wandsworth	
Other	Dr Ben Spencer, Member of Parliament for Runnymede and Weybridge
	South Hampstead Flood Action Group
	West Holland Park Forum
	Woking Drainage Action Group
Parish Council	East Hendred Parish Council
Regulator	CC Water
	Environment Agency
	Greater London Authority
	Natural England
	Ofwat
Water Company	Affinity Water

## Appendix C – Public consultation questions and summarised responses

Below is a list of the questions that were asked as part of the public consultation along with a summary of the responses we received that includes signposting to where each topic is discussed further within this document.

General questions	Summarised responses
1. Do you think these targets are too ambitious or not ambitious enough for a 25-year plan?	Stakeholders have asked for the targets to be more measurable, ambitious and adaptive. See, for example, Table 5–1, sub-theme amendment of targets in relation to storm overflows and sewer flooding.
2. If not, what targets would you like to see in the final plan/our next DWMP?	The majority of stakeholders responded that they would like to see a reduction in stormwater overflows, less of a focus on short term planning, more storm overflow monitoring and increased data sharing (see Table 5–3 sub theme suggestions of benefits).
3. Do you have any comments on the main solutions set out in the draft plan?	Stakeholders provided many suggestions for additional and alternative solutions as well as ideas about how we might improve our options appraisal/prioritisation process. Stakeholders expressed concerns around the practicality of implementing such an ambitious SuDS plan (see Table 5–3 sub theme deliverability of SuDS). Stakeholders also asked for more evidence around the costs and benefits of solutions.
4. Please tell us about any alternative solutions that you feel should also be considered	A list of the alternative solutions provided by stakeholders is provided in Appendix F.
5. Do you agree that working in partnership will make a significant contribution to meeting the objectives of DWMP?	The majority of stakeholders responded “yes”, agreeing that working in partnership will make a significant contribution to meeting the objectives of DWMP, see Table 5–5 for further details.
6. How do you think we could do this differently to generate even more opportunities? If we have missed a great opportunity, let us know here.	A summary of the responses include: <ul style="list-style-type: none"> <li>• More partnership working</li> <li>• More data and information sharing to stakeholders</li> <li>• Earlier engagement with stakeholders</li> <li>• Joined up funding</li> </ul> See Table 5–4 for a review of your suggestions of how we could enhance our plan.
7. Our preferred plan is the resilient system plan. Do you agree with this inside London? Do you agree with this outside London?	The majority of stakeholders responded “yes” outside of London and the response was equally split within London. See Appendix G for further details.
8. If not, what is your view on the other plan scenarios we show? What aspects are influencing your assessment?	Many stakeholders responded that the plan needs to be delivered quicker, for details see Table 5–1 sub theme Change in delivery profile of the plan.
9. What alternative wider benefits would you like to see in the final plan/our next DWMP to improve the overall plan outcome?	A list of the alternative solutions provided by stakeholders are outlined in Appendix F – List of suggested solutions. See also Table 5–3 sub theme Suggestions for benefits.
10. Our preferred plan is the resilient system plan. Do you agree with this?	There was a mixed response, but the majority of stakeholders responded “yes”. See also Table 5–1 sub theme views on the preferred resilient plan.



<p>11. If not, what is your view on the other plan scenarios we show? What aspects are influencing your assessment?</p>	<p>Those that didn't agree that the resilient plan should be our preferred plan felt we should instead maximise efforts. Some noted that the question was unfair because the plans were presented in a way that indicates there is no viable alternative to the resilient plan; for instance, two out of the four options risk damage to property or the environment, and so don't meet Thames Water's own targets and are therefore not even worth considering in the DWMP. Others noted that not even the 'maximum score plan' was looking to achieve better flooding and overflow targets – it just focuses on improving the speed of delivery. Overall, those that didn't support the preferred plan being the resilient plan, felt that there should be a middle ground between the 'resilient plan' and 'maximum score plan' to achieve the same targets, but more quickly.</p>
<p>12. What alternative wider benefits would you like to see in the final plan/our next DWMP to improve the overall plan outcome?</p>	<p>Benefits that some stakeholders wanted to see feature more prominently in the Plan included:</p> <ul style="list-style-type: none"> <li>• Agriculture and farming benefits e.g., to store and slow flows across agricultural land.</li> <li>• Health and wellbeing benefits linked to 'natural' water and Green Infrastructure in developments.</li> <li>• Property based solutions which attenuate peak runoff, whilst also providing water resources to alleviate demand on mains water supply (e.g., water storage tanks / butts).</li> </ul> <p>A list of the alternative solutions provided by stakeholders are outlined in Appendix F.</p> <p>You also asked us to put a greater emphasis on carbon neutrality and supporting nature recovery.</p>
<p>13. Do you believe our DWMP strikes the right balance between affordability, deliverability and ambition?</p>	<p>The majority of stakeholders responded no, as they believe our DWMP does not strike the right balance between affordability, deliverability and ambition. Our stakeholders wanted us to be more ambitious, see Table 5–1.</p>
<p>14. If not, what could we incorporate into the final plan/our next DWMP to improve this?</p>	<p>Many stakeholders wanted to see a holistic plan that can deliver more solutions and benefits in a shorter period of time. Your suggestions for amendments to our targets are set out in Table 5–1 sub theme: Amendment of targets.</p>
<p>15. On a scale of 1 to 5, how well do you believe we achieved the aim of creating a shared plan through stakeholder interaction?</p>	<p>The majority of stakeholders provided answered 3.</p>
<p>16. What could we do differently to encourage more engagement in the plan?</p>	<p>You told us increased and earlier engagement with local communities and stakeholders would encourage more engagement. Some stakeholders wanted shorter summary documents outlining the details in simpler language.</p>
<p>17. Do you have any further comments on the Drainage and Wastewater Management Plans not covered by the previous questions?</p>	<p>Further comments mentioned by stakeholders included:</p> <ul style="list-style-type: none"> <li>• We would like a follow up setting out how it is proposed the consultation will influence the fDWMP.</li> <li>• Real-time public disclosure of the number, duration and volumes per year of sewage discharges.</li> <li>• Clear articulation of residual risk.</li> <li>• Detailed funding methods to be provided.</li> </ul>



18. Are you responding as an individual or on behalf of an organisation or group?	69 stakeholders responded to the public consultation on behalf of an organisation, 19 as individuals and 7 identified as other.
19. Can we publish your response?	65 stakeholders responded yes and 10 no.
20. Finally, it would really help us if you let us know where you found out about this consultation.	Most of the responses were from the following sources: <ul style="list-style-type: none"><li>• Direct request from Thames Water</li><li>• Email from Thames Water</li><li>• DWMP workshop</li><li>• Thames Water website</li><li>• Through catchment partnership networks</li></ul>

## Appendix D – Customer research questions and summarised responses

Below is a list of the customer research questions alongside a summary of the responses we received.

Section	Questions	Summarised responses
<b>Awareness of growing challenges for the wastewater system</b>	<ul style="list-style-type: none"> <li>How aware were you of the increasing risk in the future of flooding from wastewater due to changing climate and weather patterns?</li> <li>How aware were you of the need to upgrade sewage treatment works in the region to ensure they continue to meet legal standards to maintain river water quality?</li> </ul>	Overall, respondents had a reasonable level of awareness of the implications of climate change and population growth for the wastewater system. The results were similar for non-household respondents, with around 70% of respondents (n=300) at least “somewhat aware” for both questions.
<b>Views on sewer overflows</b>	Do you think it is acceptable that the wastewater system in the future would continue to allow overflows to occur in extreme circumstances?	Around half of respondents stated that storm overflows were acceptable in circumstances where they were (i) kept to a minimum or (ii) there was no harm to the environment. Notwithstanding, a sizeable proportion of respondents found storm overflows unacceptable in principle (around 1 in 3). Details about our approach to managing storm overflows can be found in Table 5–1.
<b>Sewer overflows versus sewer flooding</b>	Based on the information provided so far about the wastewater system in the region and the plan to improve it, which problem do you think is worse?	Views were mixed on the significance of sewer flooding and overflow problems. Overall, there was a leaning from both household and non-household respondents towards flooding being worse. However, a significant proportion of respondents (around 1/3) –especially household respondents –felt that both problems were of equal severity. Details about our approach to managing storm overflows and sewer flooding can be found in Table 5–1.
<b>Support for new solutions</b>	Increasing the use of new solutions will involve building partnerships with other organisations that own suitable land, consulting with local communities to ensure that all proposals are acceptable, and then building a large enough network of sites to reduce the amount of rainwater entering sewers. Given this, do you support the target set out in the plan?	High levels of support across the board were observed for the use of new solutions in the DWMP. Around 7 in 10 respondents (household and non-household) supported targets for significantly increasing use of SuDS and other actions to “replumb” the wastewater system. A full list of the new solutions suggested during the consultation can be found in Appendix F and they are discussed in Table 5–3.

Section	Questions	Summarised responses
<p><b>Views on timing and pace of investment</b></p>	<p>Which of the following approaches for the plan do you agree with most?</p> <ul style="list-style-type: none"> <li>• Fast</li> <li>• Steady</li> <li>• Even</li> <li>• What is the reason(s) why you selected the above answer?</li> <li>• It's important the targets are met as soon as possible</li> <li>• It's worth the risk to investment sooner if it means the wastewater system will be improved quicker</li> <li>• There is more time for planning to ensure the targets are met</li> </ul> <p>It is sensible to wait to reduce the risk of making the wrong investments</p> <ul style="list-style-type: none"> <li>• The benefits are higher overall</li> <li>• A lower bill impact upfront will be more affordable for customers</li> <li>• The overall cost of the approach</li> <li>• The benefits will be experienced sooner</li> <li>• Current cost of living increases mean we should delay investments for as long as possible</li> <li>• Other</li> <li>• Don't know</li> </ul>	<p>In principle (noting that the survey was done prior to more detailed information on the bill impact of the DWMP was introduced) respondents tended to favour an “even” pace of investment. The main reasons cited were that there is more time for planning to ensure the targets are met and to have a lower bill impact upfront that will be more affordable for customers. “Fast” pace was the least preferred profile overall. The delivery profile of the plan is discussed in Table 5–1 and impacts of the fDWMP on customer bills are discussed in Table 5–2.</p>
<p><b>Planning objectives – ranking top-level targets: Household</b></p>	<p>Please rank the targets from 1 – 5 in terms of which you think is the most important to achieve, where 1 = “most important”, 2 = “2nd most important”</p> <ul style="list-style-type: none"> <li>• Reduce property flooding (London)</li> <li>• Reduce property flooding (Thames Valley)</li> <li>• Protect the environment (London)</li> <li>• Protect the environment (Outside London)</li> <li>• Resilient wastewater system (London)</li> <li>• Resilient wastewater system (Thames Valley)</li> <li>• Reduce storm overflows (London)</li> <li>• Reduce storm overflows (Thames Valley)</li> <li>• New solutions (London)</li> <li>• New solutions (Thames Valley)</li> </ul>	<p>For households, reducing flooding had the highest (average) ranking. However, overall, the result for the most important aspect of the plan is relatively marginal with minor differentiation between reducing property flooding and protecting the environment. Similarly, resilience and reducing storm overflows were ranked joint third and no single outcome/target substantially stands out.</p> <p>Details about our approach to protecting the environment, managing storm overflows and sewer flooding can be found in Table 5–1.</p>



Section	Questions	Summarised responses
<b>Planning objectives – ranking top-level outcomes:</b> <b>Non-household</b>	<p>Please rank the targets from 1 – 5 in terms of which you think is the most important to achieve, where 1 = “most important”, 2 = “2nd most important”</p> <ul style="list-style-type: none"> <li>• Reduce property flooding (London)</li> <li>• Reduce property flooding (Thames Valley)</li> <li>• Protect the environment (London)</li> <li>• Protect the environment (Outside London)</li> <li>• Resilient wastewater system (London)</li> <li>• Resilient wastewater system (Thames Valley)</li> <li>• Reduce storm overflows (London)</li> <li>• Reduce storm overflows (Thames Valley)</li> <li>• New solutions (London)</li> <li>• New solutions (Thames Valley)</li> </ul>	<p>For non-households reducing flooding had the highest (average) ranking.</p> <p>However, overall, the result for the most important aspect of the plan is relatively marginal with minor differentiation between reducing property flooding and protecting the environment. Similarly, resilience and reducing storm overflows are ranked joint third.</p> <p>No single outcome/target substantially stands out.</p> <p>Details about our approach to protecting the environment, managing storm overflows and sewer flooding can be found in Table 5–1.</p>
<b>Support for the preferred plan (acceptability):</b> <b>Household</b>	<p>Overall, how acceptable is the plan for improving the wastewater system in the region and its impact on customer bills?</p> <ul style="list-style-type: none"> <li>• Acceptable</li> <li>• Unacceptable</li> <li>• Don’t know/can’t say</li> </ul>	<p>There was a good level of support for the preferred plan (&gt;60% “acceptable” or “very acceptable”). The main reasons: the proposed environmental improvements are needed and benefit future generations. The plan was unacceptable to around 25%, with the main reasons: scale of bill impact (unaffordable), and against bill increases in principle (customers should not have to pay for the plan). Findings from the public consultation regarding stakeholder views of the resilient plan are presented in Section 3 and Appendix G.</p>
<b>Support for the preferred plan (acceptability):</b> <b>Non-household</b>	<p>Overall, how acceptable is the plan for improving the wastewater system in the region and its impact on customer bills?</p> <ul style="list-style-type: none"> <li>• Acceptable</li> <li>• Unacceptable</li> <li>• Don’t know/can’t say</li> </ul>	<p>There were slightly higher levels of acceptability for the preferred plan compared to the household results (64–67% “acceptable” or “very acceptable”). The main reasons being: proposed investments are needed, benefit for future generations and environmental improvement.</p> <p>How the fDWMP could affect customer bills is discussed in Table 5–2.</p>
<b>Preference between alternative plans:</b> <b>Household results</b>	<p>Respondents were shown showcards when asked which plan they thought was best:</p> <ul style="list-style-type: none"> <li>• Enhanced plan</li> <li>• Current proposed plan</li> <li>• Reduced plan</li> <li>• Reduced plan – focus on sewer overflows</li> </ul>	<p>The current proposed plan was the most preferred with reasons being: the plan represents value for money, it is more affordable than the enhanced plan. The enhanced plan was the second most preferred. Overall, support for the proposed level of action or more action outweighed the preference for a reduced scope of plan.</p> <p>Consultees views on the preferred plan are discussed further in in Table 5–1.</p>

Section	Questions	Summarised responses
<b>Preference between alternative plans:</b> <b>Non-household results</b>	<p>Respondents were shown the following showcards when asked which plan they think is best:</p> <ul style="list-style-type: none"> <li>• Enhanced plan</li> <li>• Current proposed plan</li> <li>• Reduced plan</li> <li>• Reduced plan – focus on sewer overflows</li> </ul> <p>Which option for the plan do you think is best (i.e., the option you prefer most)?</p>	<p>The current proposed plan was the most preferred plan. Main reason being the plan represents value for money.</p> <p>Consultees views on the preferred plan are discussed further in in Table 5–1.</p>
<b>More stringent targets for minimising/eliminating storm overflows:</b> <b>Household</b>	<ul style="list-style-type: none"> <li>• Would you support a target to eliminate/minimise storm overflows by 2050 that resulted in a further increase in customer bills?</li> <li>• Would you support a target to eliminate/minimise storm overflows by 2050 if it meant that less investment would be made to protect against flooding from sewers?</li> </ul>	<p>Just over 50% of respondents supported more stringent storm overflow targets at added cost. But this level of support reduced if added investment came at the expense of efforts to reduce flooding (&lt;50%).</p> <p>Details about our approach to managing storm overflows can be found in Table 5–1.</p>
<b>More stringent targets for minimising/eliminating storm overflows:</b> <b>Non-household</b>	<ul style="list-style-type: none"> <li>• Would you support a target to eliminate/minimise storm overflows by 2050 that resulted in a further increase in customer bills?</li> <li>• Would you support a target to eliminate/minimise storm overflows by 2050 if it meant that less investment would be made to protect against flooding from sewers?</li> </ul>	<p>In comparison to households there was a higher level of support from non-household respondents for more stringent targets for storm overflows even if it resulted in higher bills / came at the expense of efforts to reduce flooding.</p> <p>Details about our approach to managing storm overflows can be found in Table 5–1.</p>

## Appendix E – Spread of stakeholder responses by theme

The following graphs show how many stakeholders made comments about each of the sub themes discussed in Section 5 of this report.

### Protecting the environment: Level of ambition and pace of delivery

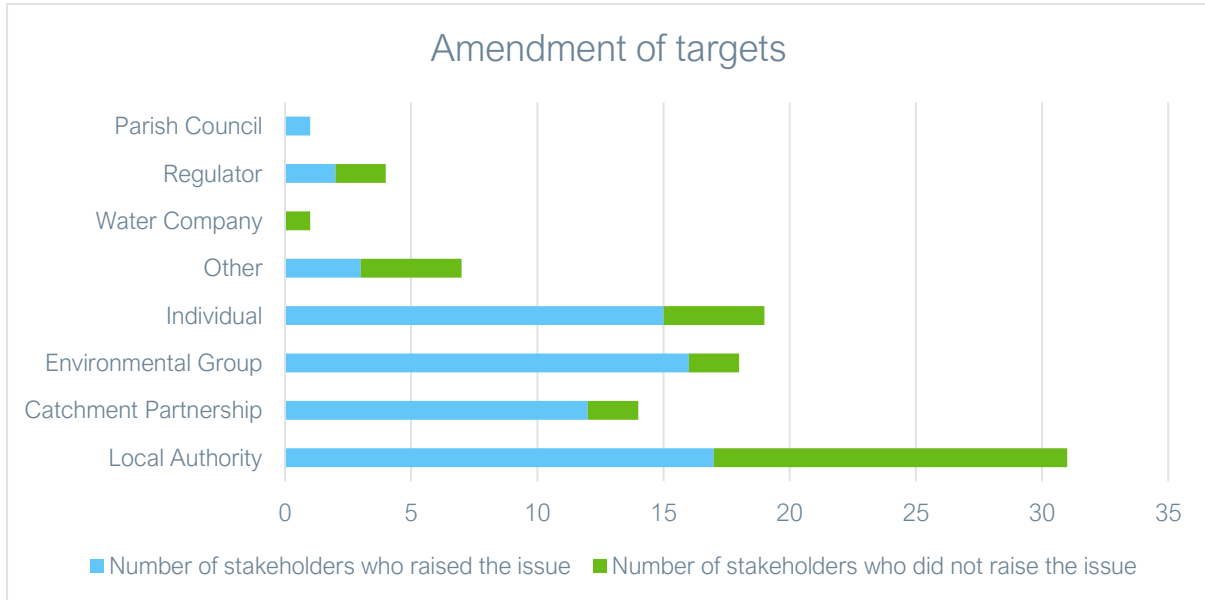


Figure E1 – Number of stakeholders who raised the issue that targets should be amended

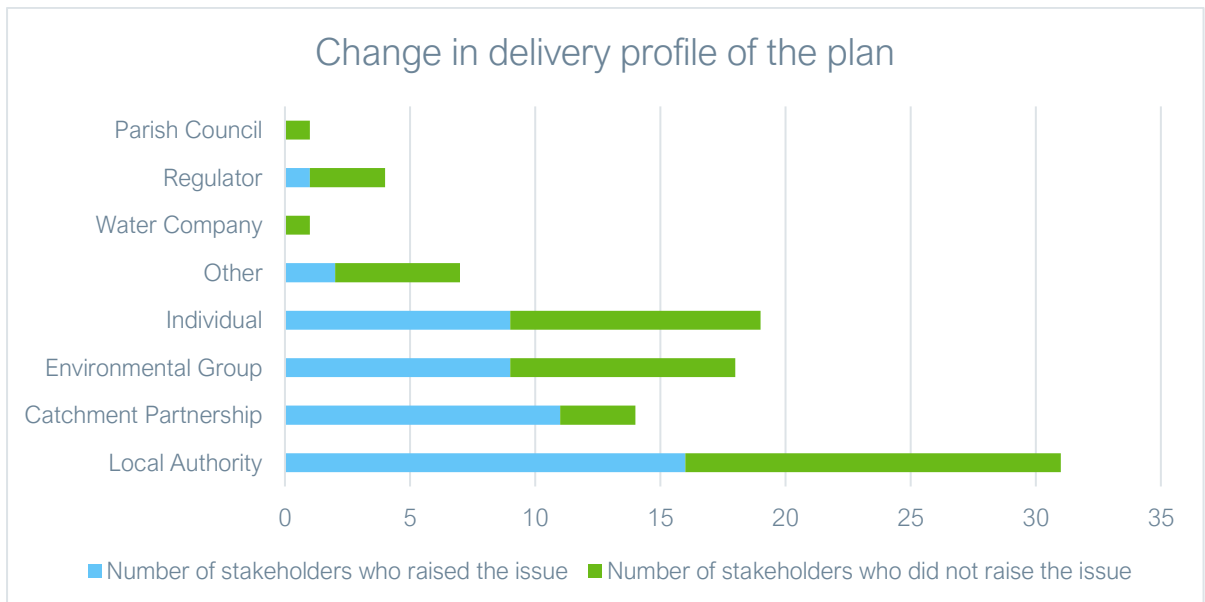


Figure E2 – Number of stakeholders who wanted a change in delivery profile of the plan

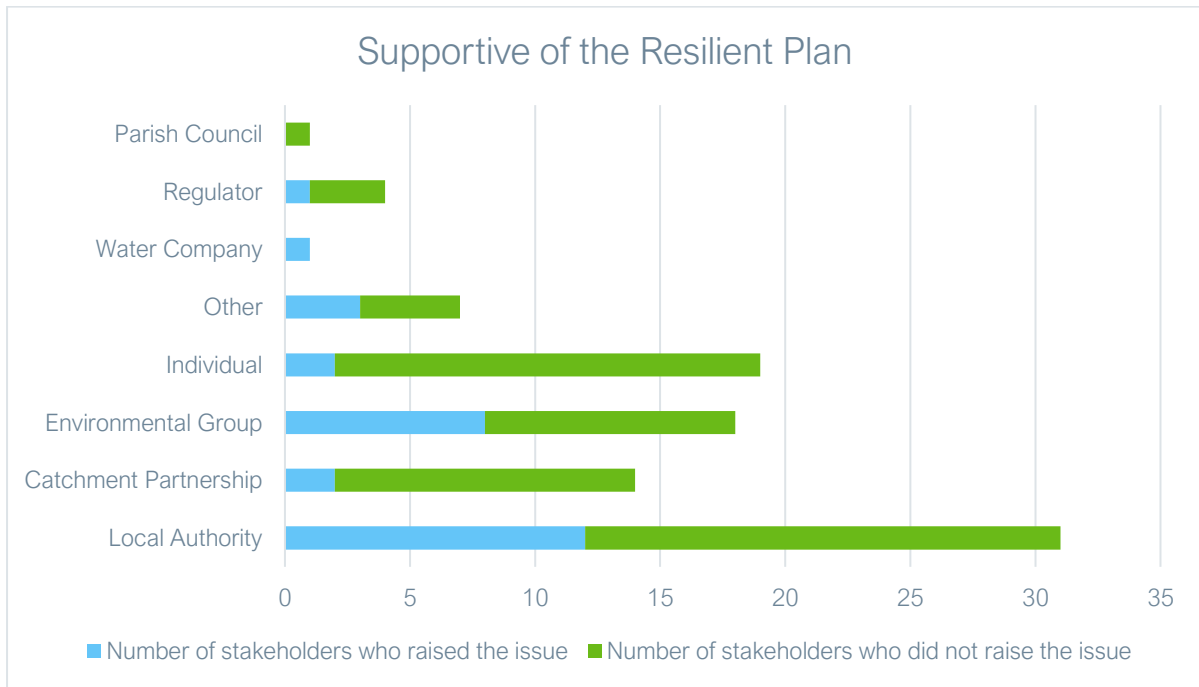


Figure E3 – Number of stakeholders who were supportive of the Resilient Plan

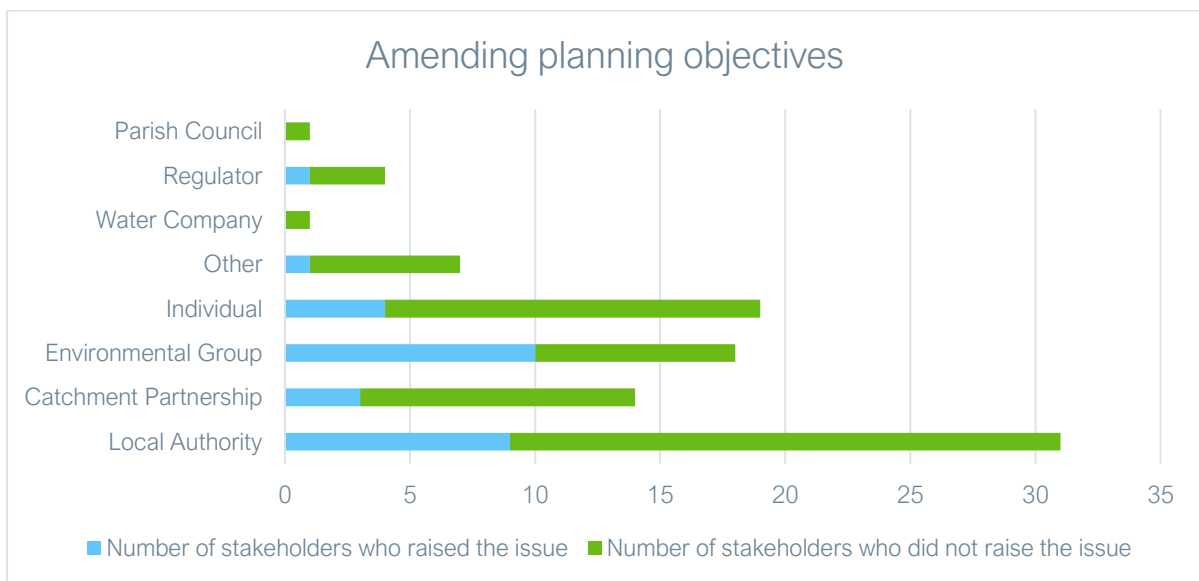


Figure E4 – Number of stakeholders who raised the issue that planning objectives should be amended



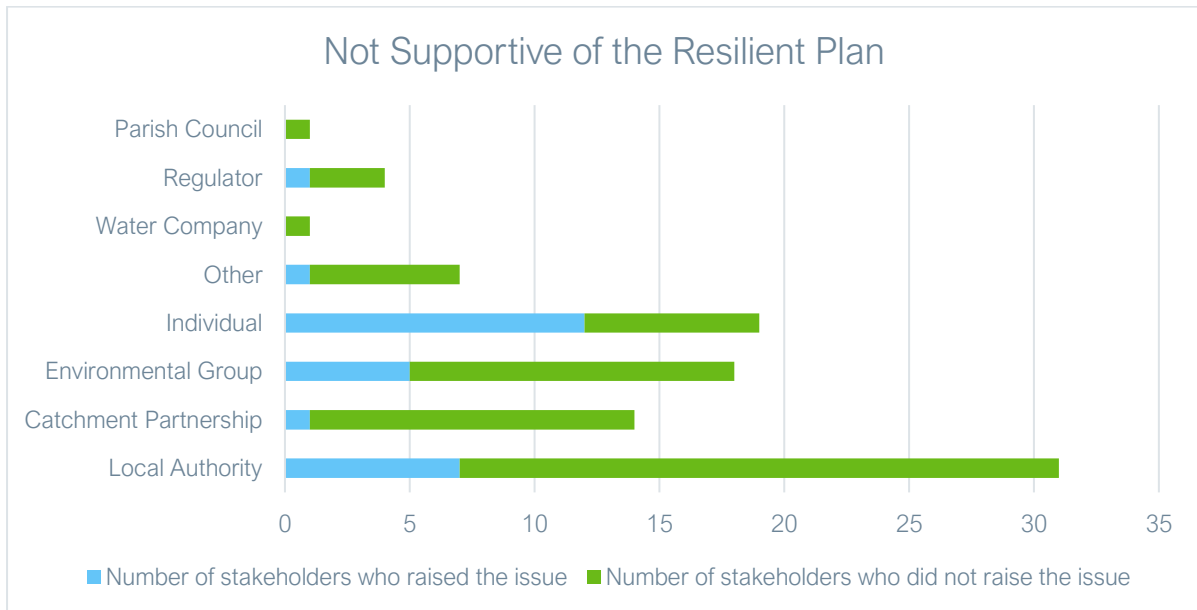


Figure E5 – Number of stakeholders who were not supportive of the Resilient Plan

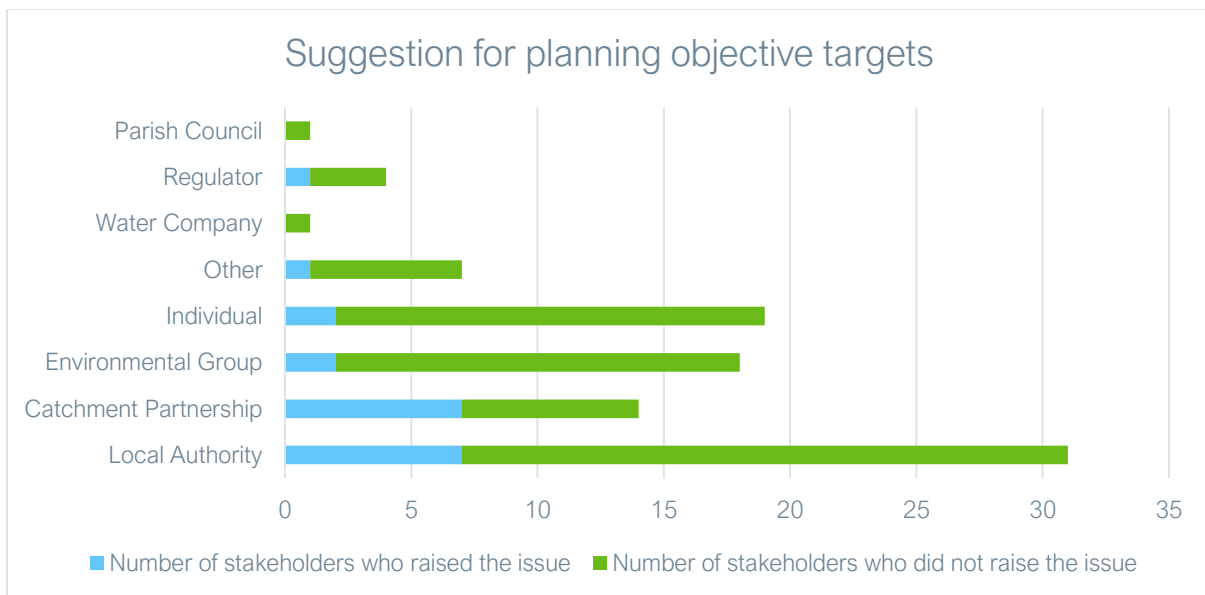


Figure E6 – Number of stakeholders who provided suggestions for planning objective targets

### Evidencing Best Value: Affordability and bill impact

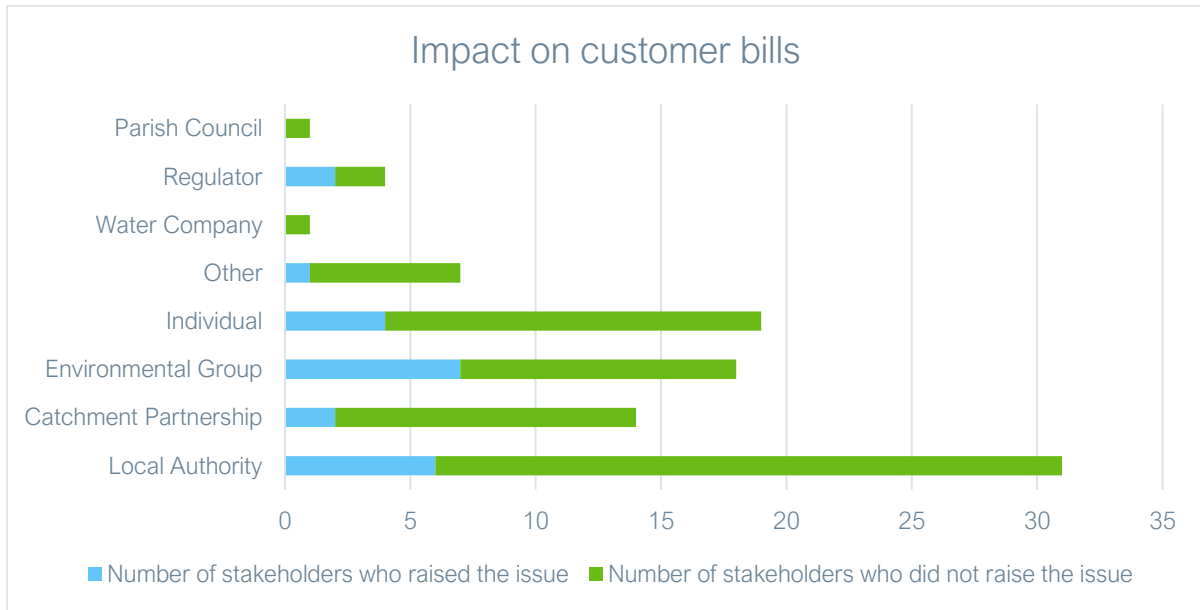


Figure E7 – Number of stakeholders who raised the issue of impact on customer bills

### Delivery: Solutions and deliverability of the plan

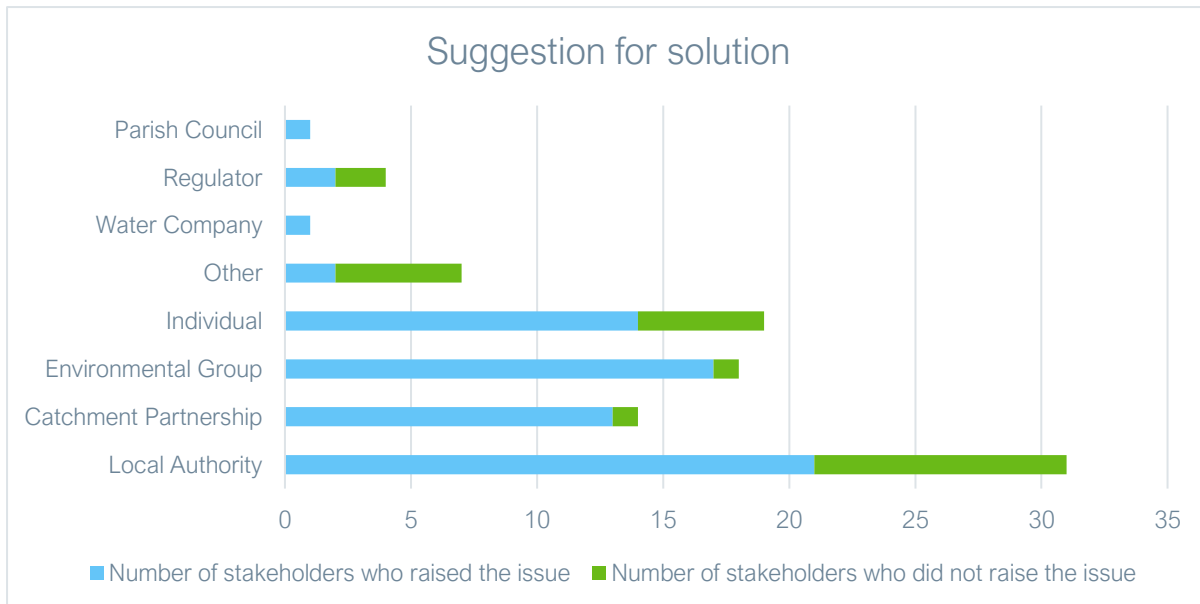


Figure E8 – Number of stakeholders who provided suggestions for solutions

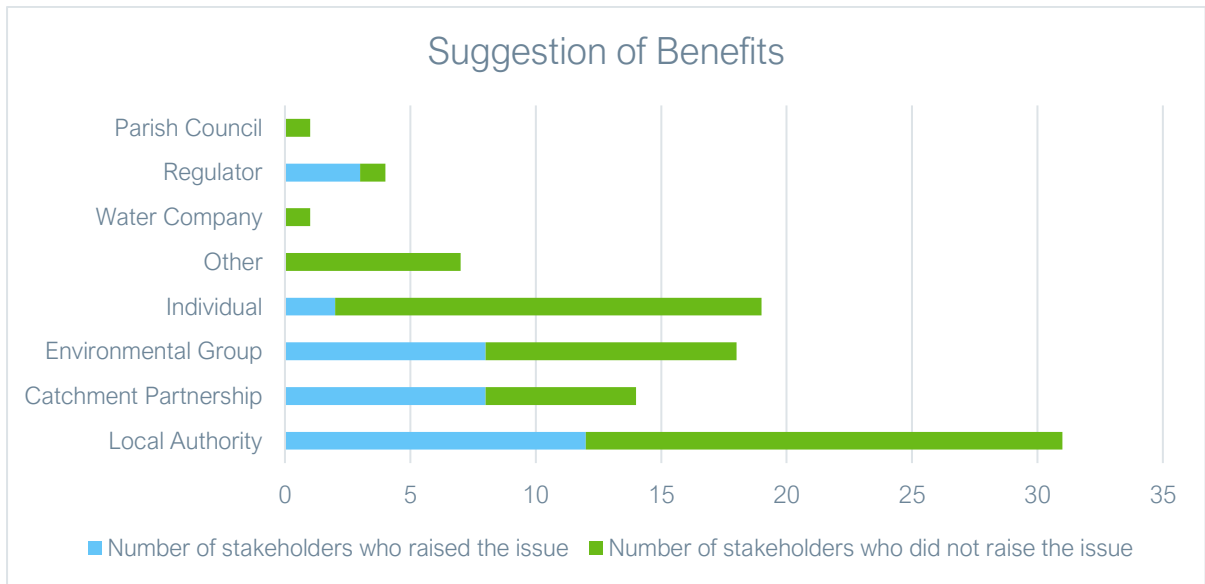


Figure E9 – Number of stakeholders who provided suggestions for benefits

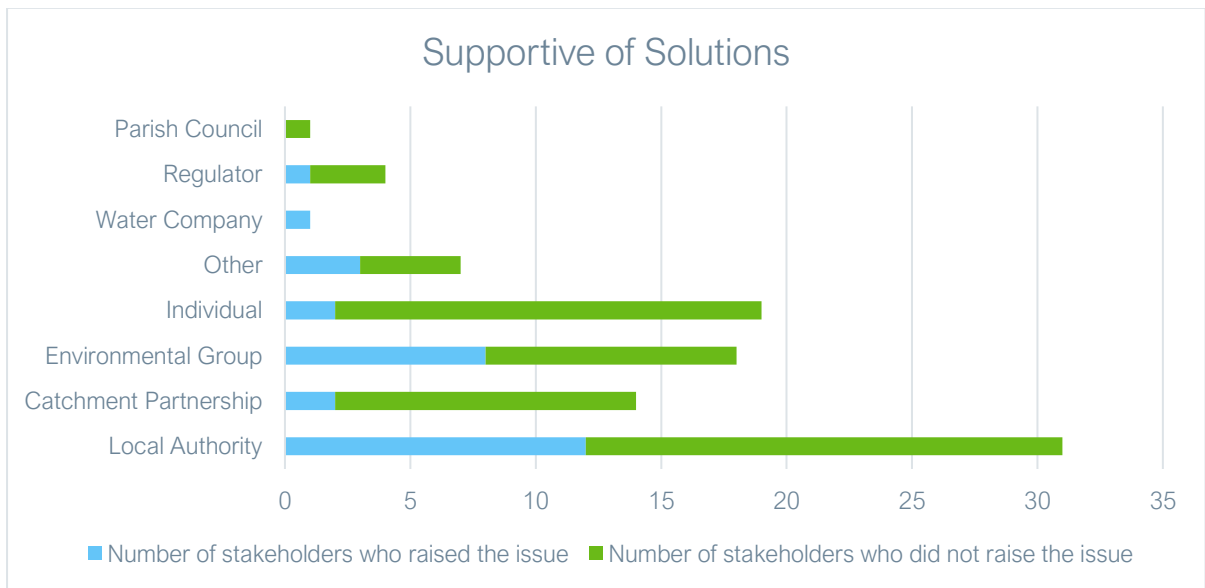


Figure E10 – Number of stakeholders who were supportive of the solutions

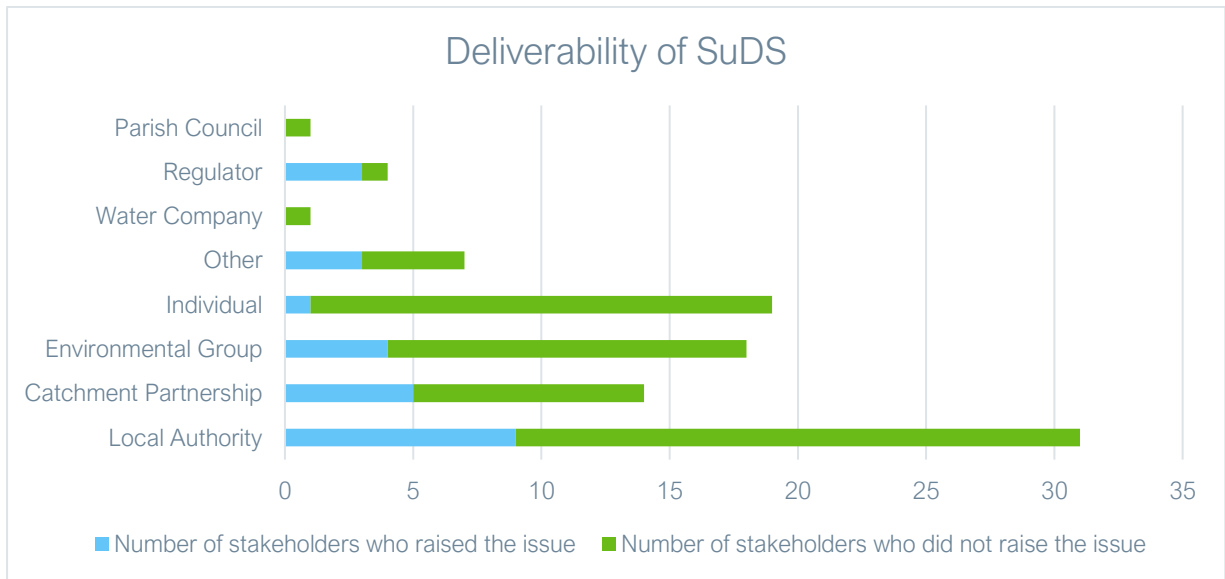


Figure E11 – Number of stakeholders who raised an issue around the deliverability of SuDS

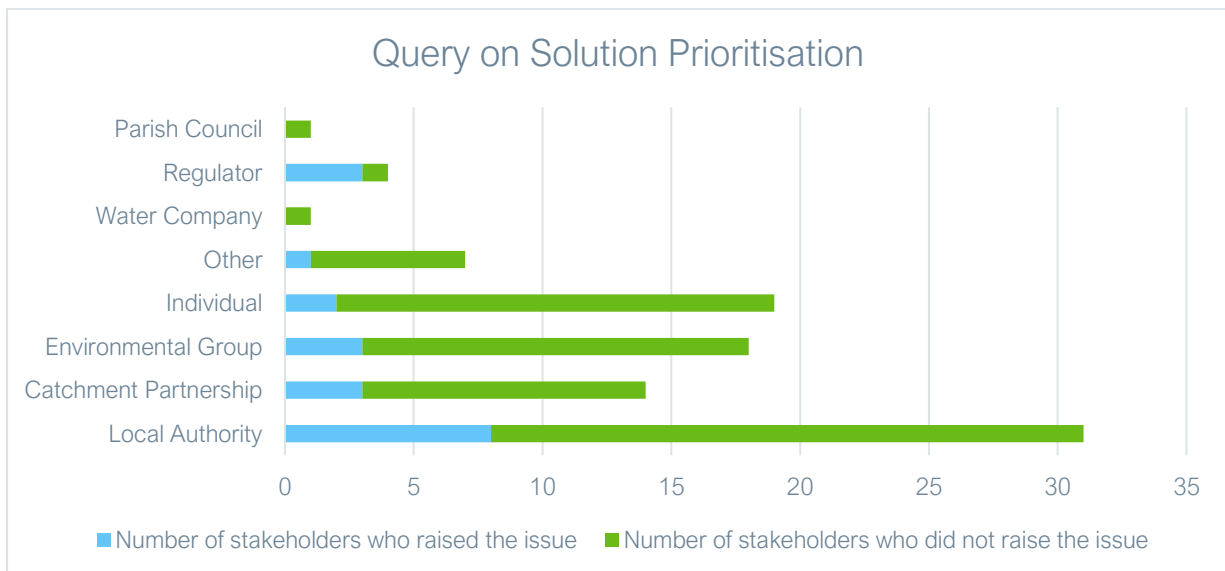


Figure E12 – Number of stakeholders who had a query on solution prioritisation



### Enhanced Plan: Technical queries, general comments and easy navigation

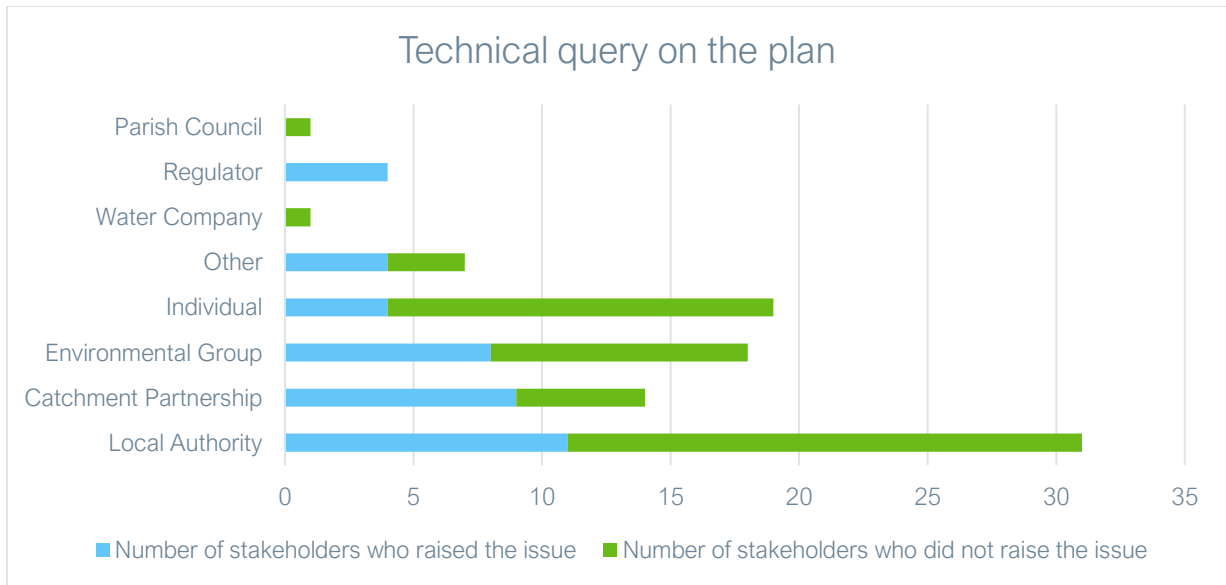


Figure E13 – Number of stakeholders who had a technical query on the plan

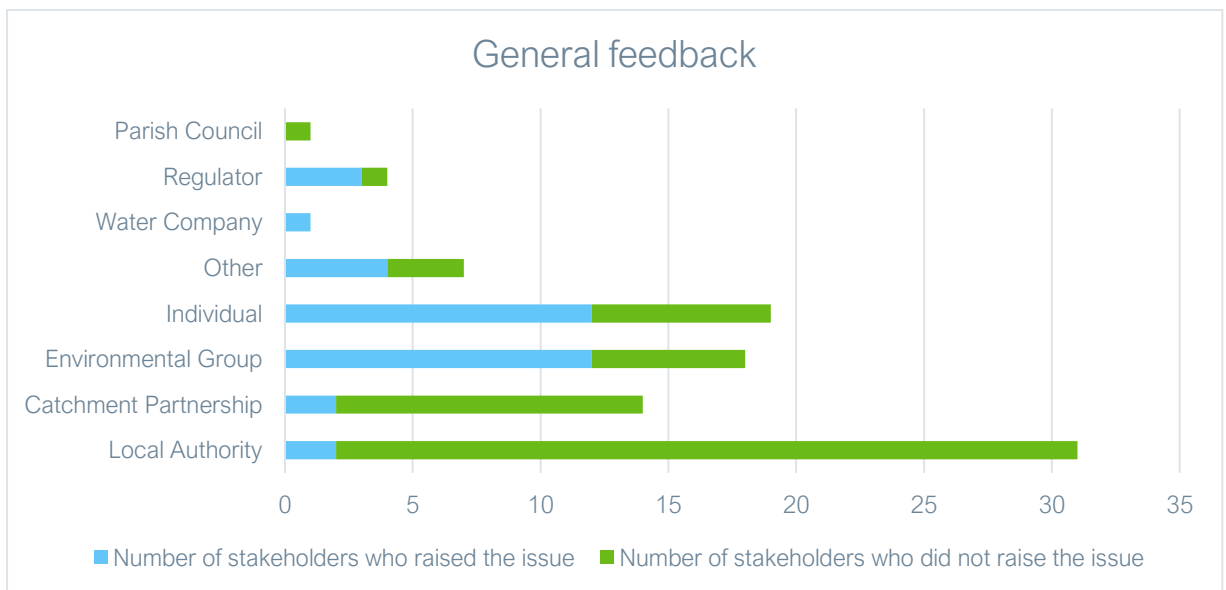


Figure E14 – Number of stakeholders who provided general feedback

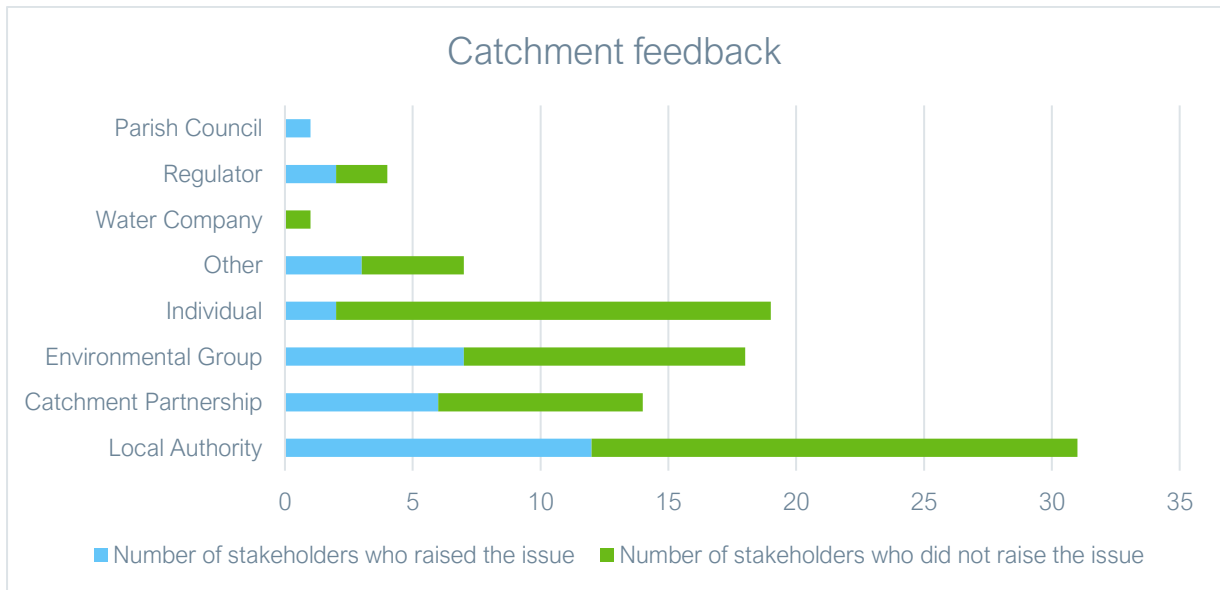


Figure E15 – Number of stakeholders who provided feedback on the catchments

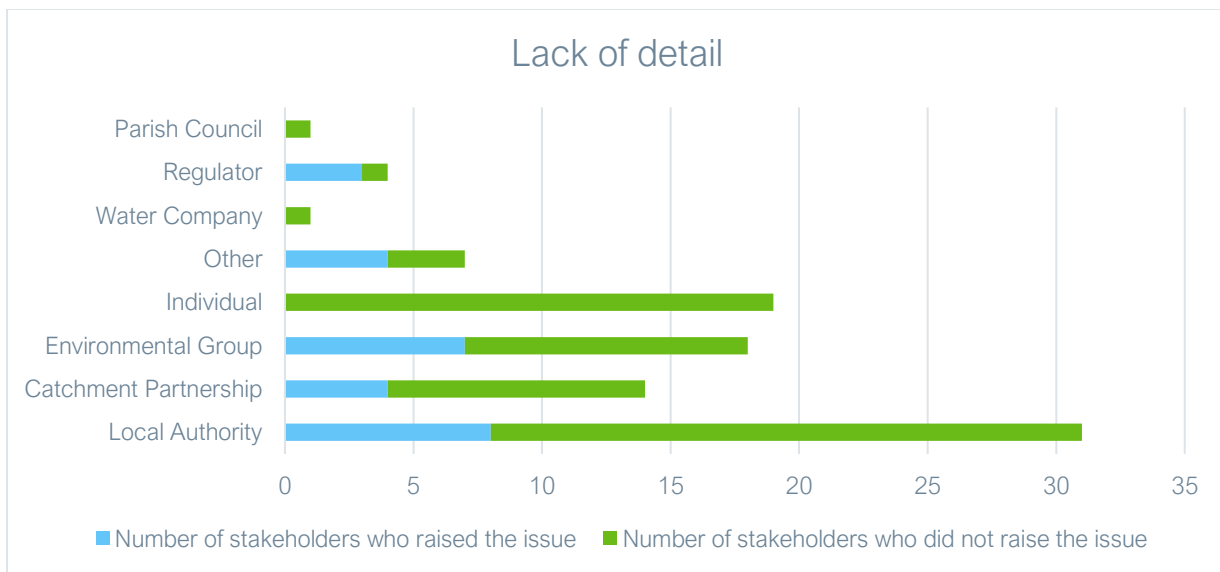


Figure E16 – Number of stakeholders who raised the issue of a lack of detail in the plan

## Partnership Working: Collaboration to achieve multiple benefits

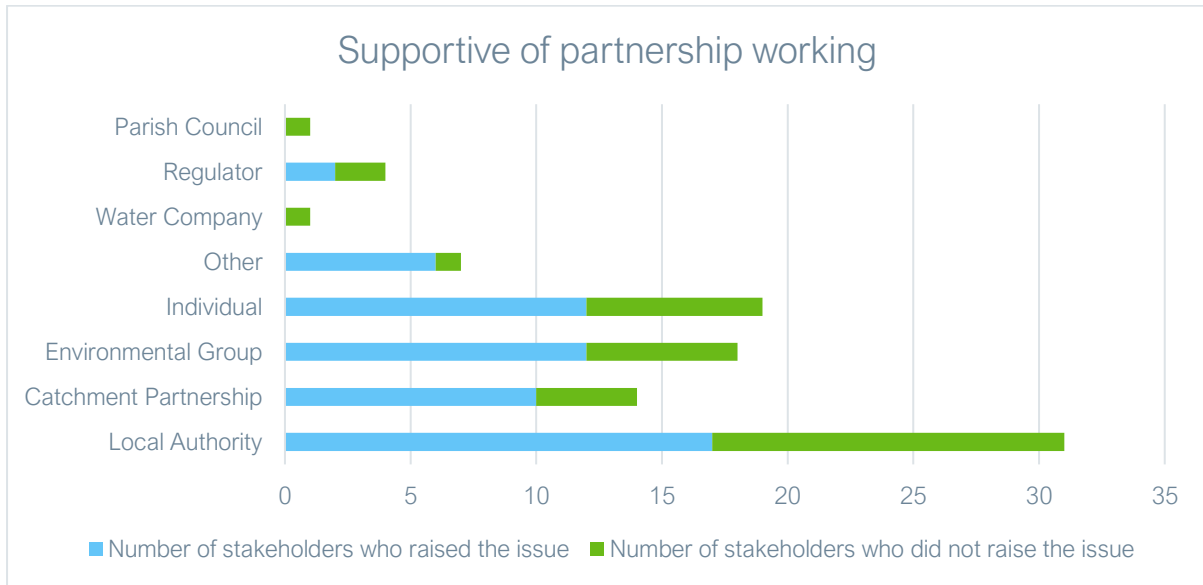


Figure E17 – Number of stakeholders who were supportive of partnership working



Figure E18 – Number of stakeholders who provided suggestions for partnership working

## Valuing Input: Stakeholder engagement

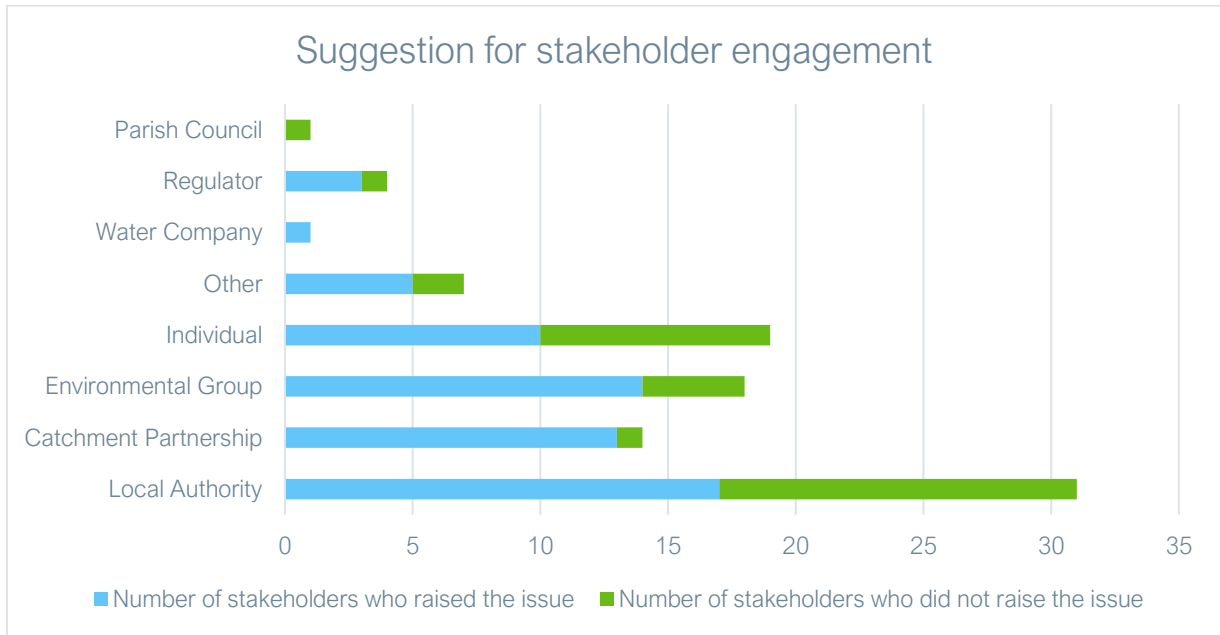


Figure E19 – Number of stakeholders who provided suggestions for stakeholder engagement

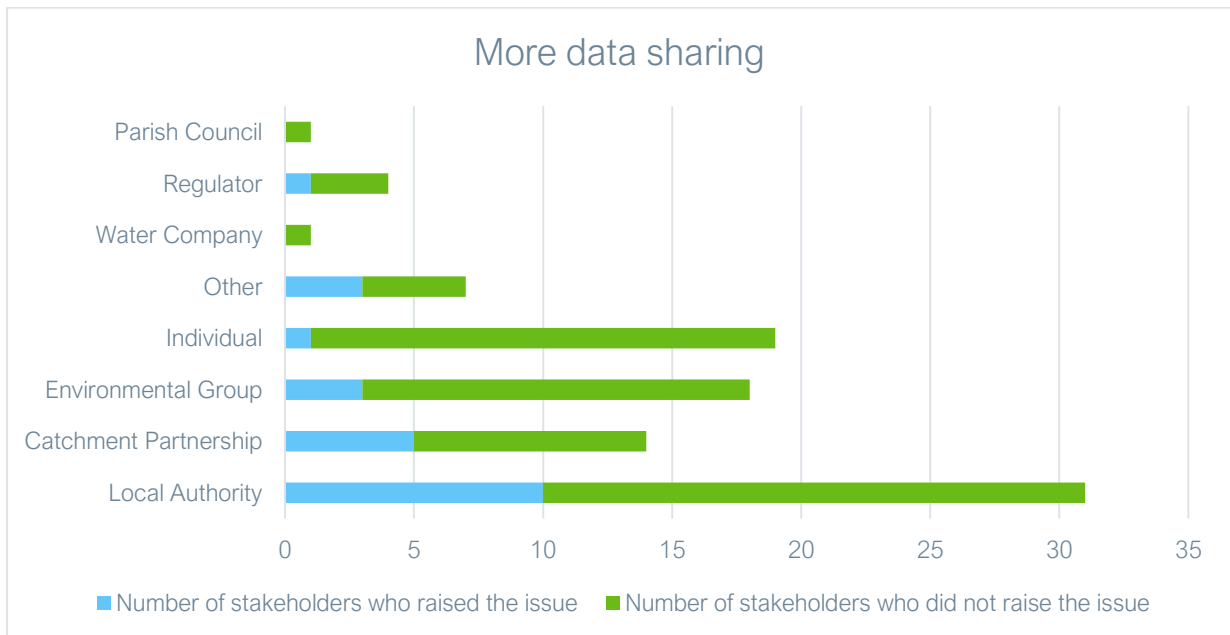


Figure E20 – Number of stakeholders who suggested that more data sharing is required



## Appendix F – List of suggested solutions

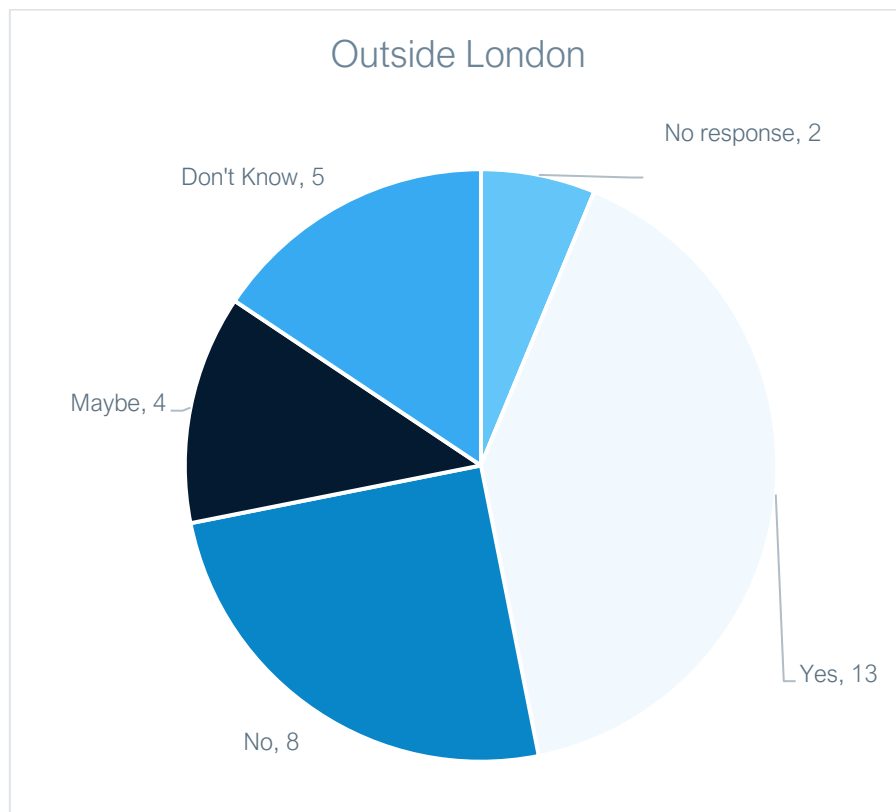
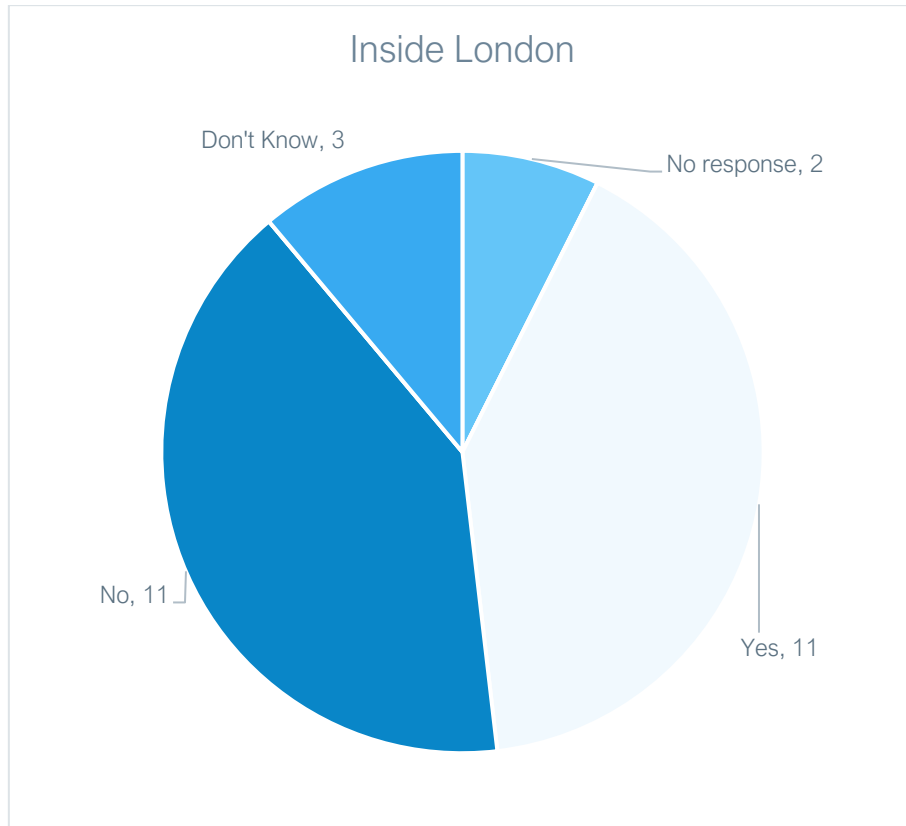
Type	Suggested solutions
Traditional engineering solutions	<ul style="list-style-type: none"> <li>• Connect to Thames Tideway Tunnel.</li> <li>• Closure of small rural wastewater and replacement with sewage pumping stations to transfer to larger and more effective stations.</li> <li>• Sewage treatment upgrades should not just be about additional or larger treatment processes, but also about treating effluent to a higher quality and developing approaches to treat emerging pollutants such as pharmaceuticals.</li> <li>• Grey water system utilisation e.g., toilet flushing.</li> <li>• Focus on repairing and replacing failing assets through planned maintenance across the sewer network.</li> <li>• Further protection to basements through FLIPS or pumped devices.</li> <li>• Develop land-based systems to remediate water quality from sewer storm overflows as an interim measure on the way towards a zero-pollution event target.</li> <li>• Focus to solve misconnections – surface-to-foul and foul-to-surface.</li> <li>• Discreet reference numbers to all outfalls to provide clarity over which outfall(s) are causing problems.</li> <li>• Reduce number of trade effluent licenses issued.</li> <li>• De-paving and reducing impermeable surfaces.</li> <li>• Constructing all new sewers with self-cleansing velocities and low maintenance systems.</li> <li>• Holistic water management – add to existing water stores for utilisation in times of drought.</li> <li>• Daylighting of surface water sewers to increase capacity &amp; realise wider environmental benefits.</li> </ul>
Green solutions	<ul style="list-style-type: none"> <li>• SuDS with local community buildings/schools.</li> <li>• Support the development of a SuDS demonstration/ best practice learning centre, particularly in relation to the retrofitting of SuDS.</li> <li>• Surface Water Separation.</li> <li>• Buffer Wetlands.</li> <li>• Natural Flood Management.</li> <li>• SuDS should cover rural as well as urban areas and encompass land management measures and the broad range of nature-based solutions.</li> <li>• Providing the public with Water Butts.</li> <li>• River restoration.</li> <li>• Mitigation to protected chalk streams and protected habitats.</li> <li>• Land acquisition by Thames Water to enable the implementation of green infrastructure.</li> </ul>



Solutions which involve our customers or stakeholders	<ul style="list-style-type: none"><li>• Thames Water to review roadway designs with Local Authority.</li><li>• Regulatory system for flushable products. Including reducing use of microplastics and plastics in sanitary products and wet wipes.</li><li>• Install biological and nature-based treatments and make operational – reduce reliance on combined sewer overflows.</li><li>• Scope for incentivising residents/landowners/stakeholders to reduce surface water entering the network.</li><li>• Working closer with new developments to ensure houses and new properties are better connected.</li><li>• Better planning and building decisions.</li><li>• Look at allowances for installing impermeable surfaces.</li><li>• Exchange of monitoring data between Thames Water and the Partners to identify issues and facilitate partner projects.</li><li>• Include Catchment Sensitive Farming and the role of farmers and landowners in minimising storm overflow events by reducing volumes of surface water reaching the foul sewage drainage network.</li><li>• Thames Water, as a Risk Management Authority, to provide support to communities where the risk of sewer flooding is high.</li><li>• Working in partnership with people doing monitoring of receiving waters.</li><li>• Lobby Government to make new property developers pay for part upgrades of sewage and rainwater facilities.</li><li>• Education on being water-wise, especially during heavy storms.</li><li>• Junior river warden sessions.</li><li>• Increasing the capacity of environmental groups to enable objectives to be reached.</li></ul>
Innovation / Research	<ul style="list-style-type: none"><li>• Innovative technology to treat sewage e.g., membrane technology.</li><li>• Delivery of a comprehensive programme of phosphate stripping at sensitive sewage treatment works.</li><li>• Create an alert system for households and businesses to allow preparation for high-rainfall events in areas where this may lead to surcharge of the drainage system i.e., ensuring that SuDS are going to be fully operational.</li></ul>

## Appendix G – Stakeholder view of the resilient plan

Public consultation question: *Our preferred plan is the resilient system plan. Do you agree with this inside London? Do you agree with this outside London?*





## Appendix H – Feedback from, and our responses to, regulators and key stakeholders

This appendix provides an individual consultation response to key stakeholders, including regulators and MPs. It has been written to provide an update of the actions that we have completed in the progression from our draft DWMP to this, our fDWMP.

### CC Water

You Said	We Did
<p><b>Targets should reflect a robust assessment of the need for intervention, best value interventions, government priorities and efficient cost of delivery.</b></p>	<p>The planning objectives we have chosen to underpin our DWMP have been created in consultation with our stakeholders. This has ensured that we have selected targets where there is a need for intervention.</p> <p>Our programme appraisal has assessed options to identify best value interventions to meet the targets developed. We have provided further detail in our fDWMP technical appendix on Programme Appraisal.</p> <p>See Table 5–1 sub–theme Amendment of targets.</p>
<p><b>Look at the long–term outcomes rather than adopting traditional engineering solutions.</b></p>	<p>The focus of our DWMP is for the long–term. We have demonstrated the benefit of green engineering as opposed to traditional solutions in our fDWMP. This will be found in the Options Development Appraisal Technical Appendix.</p> <p>See Table 5–3 sub–theme, Query on solution prioritisation.</p>
<p><b>Thames Water to work with developers to ensure separation in all new developments.</b></p>	<p>The methodology we have applied to the BRAVA assessment assumes that new development will be correctly and appropriately connected to a discharge point. We are supportive of the recent advances in Schedule 3. We will work with Local Planning Authorities (LPA’s) and developers to ensure that the National Planning Policy Framework (NPPF) and the surface water disposal hierarchy is adhered to.</p>
<p><b>Collaborate with others to ensure any national wastewater strategies are reflected in the plan.</b></p>	<p>We have continued to work with our stakeholder partners to ensure we understand other plans and strategies which may have similar aims and objectives.</p> <p>See Table 5–5 regulator comment 2.</p>
<p><b>More details on obtaining funding for joint schemes, particularly in relation to the cost sharing opportunities.</b></p>	<p>We have enhanced aspects of our partnership delivery, and these will be found in the fDWMP Stakeholder Engagement Technical Appendix. As cost sharing opportunities are developed, we will update stakeholders. We expect them to predominantly be during the delivery phase of any work. We have enhanced the methodology used to determine cost sharing of partnership projects to improve our certainty around third party costs.</p>



You Said		We Did
		See Table 5–5 sub–theme, Suggestion for partnership working.
London area	Undertaking sensitivities on customer prioritisation to gauge the extent to which this would have any discernible impact on the preferred plan.	Sensitivity testing has been updated and refined from the dDWMP and can be found in the Risk and Uncertainty Technical Appendix. Our customer research indicates that customer views are strong and a notable shift in customer views would be required to make a discernible impact on the plan. We have therefore not included a change in customer views in our uncertainty analysis. Findings from our customer research are summarised in Appendix D. See Table 5–2 sub theme impacts on customer bills for further details.
Outside London area	Express the investment programme as totex in addition to the capex presented.	Both our dDWMP and fDWMP have cost data quantified as CAPEX, OPEX and TOTEX. Please refer to the Data Tables in final publication for detailed costs.
	It should be referenced in the plan that the DWMP is only one area of planned spend over the next 25 years. Do stakeholders or consumers' views change on their preferred plan when these other layers are added. How does it impact their perception of affordability?	We have enhanced our core documentation to reflect this, specifically the Plan and associated summaries, for our fDWMP.
	Direct line of sight required between where Thames Water is now, where it will be in 50 years and where it would be if the DWMP didn't happen.	Baseline and predicted performance without DWMP intervention can be found in Appendix C – BRAVA and Problem Characterisation. Performance regarding targets can be found in the Plan.
	The difference in metrics makes it difficult to understand direction of travel, for example, is 99.74% STW permit compliance comparable to 'the permit compliance of our STWs in almost half of our catchments (44%) could be at risk'.	We have included additional commentary in our fDWMP to improve clarity.
	In the non–technical summary include detail of the local action groups involved and an appraisal of how these sessions has gone.	The list of stakeholders and engagement can be found in the Stakeholder Engagement Technical Appendix. This has been updated to include the public consultation.
	Clarity required on who Thames Water might be engaging with in the future to facilitate SuDS.	We are keen to engage with stakeholders proposing to deliver SuDS that could affect flow into our assets. We have reported on engagement to date in our Stakeholder Engagement Technical Appendix and extended that with a new Technical Appendix highlighting advances in SuDS delivery, for our fDWMP.  We recognise the issues with ownership and maintenance of SuDS. We will continue to work with the industry in improving knowledge and understanding, as we have done in the London Strategic SuDS Pilot Study.





You Said	We Did
	<p>We also welcome the government decision to enact Schedule 3 of the Flood and Water Management Act 2010 and believe this will assist with the ownership and maintenance of SuDS.</p> <p>See Table 5–3 sub-theme: Deliverability of SuDS and new fDWMP technical appendix – Delivery of SuDS and nature-based solutions.</p>
<p>Further evidence required that Thames Water can achieve their SuDS ambitions.</p>	<p>We have developed a new fDWMP technical appendix to address this concern as it was raised by numerous stakeholders. See Table 5–3 sub-theme: Deliverability of SuDS and new technical appendix – Delivery of SuDS and nature-based solutions.</p>
<p>Non-technical summary document should mention what happens if actual population is significantly lower than forecasted in the context of sewage treatment works capacity.</p>	<p>We have developed a series of adaptive planning approaches that account for variations in population growth. These meet the Ofwat guidance on “Long-Term Delivery Strategies” and will be found in the fDWMP technical appendix on Adaptive Pathways.</p>
<p>Breakdown required of how Thames Water see the £25bn over the next 25 years being spent – this would reinforce the point about how Thames Water have sought to spread the cost.</p>	<p>Our fDWMP provides a profile of investment over 25 years. Additionally, a series of Data Tables demonstrate spend over time.</p>

## Environment Agency

You Said	We Did
<p>For the BRAVA assessment for the common Planning Objective on internal sewer flood risk, a 1 in 30-year flood (3.3%AEP) and not larger has been made. This is not consistent with the Water UK DWMP guidance which recommended an assessment against a 1 in 50-year flood event. We would like to understand the sensitivity of this 1:30 assessment compared to the recommended 1:50.</p>	<p>We completed both 1 in 30-year and 1 in 50-year flood risk analysis in our BRAVA stage. To distinguish between the two, we called the 1 in 50-year scenario “Resilience”. Refer to Technical Appendix C for more details.</p> <p>Our plans also consider the target of 1 in 50-year protection for our customers (this planning objective was titled Risk of Flooding in a 1 in 50-year storm in Technical Appendix D of the dDWMP – Options development and appraisal). Our preferred plan was focused on targets related to this metric.</p>
<p>Greater detail within the options appraisal regarding the assumptions employed that underpin the justification for the scale of the SuDS options within the plan’s best value blend (particularly within London), as well as the anticipated key risks, impacts and mitigation for delivery of the programme. A significant amount of additional background work has been undertaken which is not included within the</p>	<p>We recognise significant background work concerning SuDS, predominantly by partners. We also recognise that some of that work is bespoke to our region and specifically London.</p> <p>We have incorporated some of this material in our new fDWMP Technical Appendix on SuDS deliverability to demonstrate the direction of travel for ourselves, the</p>



You Said	We Did
documents.	sector as a whole and our partners. For further details see Table 5–3 sub–theme, Deliverability of SuDS.
<p>Thames Water has acknowledged that there was some stakeholder feedback that could not be incorporated into this cycle but will be incorporated into cycle 2. We made several contributions at the stakeholder workshops about groundwater quality which have not been considered in the plan. 20% of sewerage systems outside of London suffer from groundwater infiltration (See Annex 1 A8 for further details) – when groundwater levels are low, the flow will be in the other direction.</p> <p>The SEA includes information on groundwater protection and how it should be incorporated in the DWMP but is not currently addressed within the DWMP. Further work is needed between now and publication to incorporate the guidance held within the SEA. The contents of the SEA should not be dealt with in isolation, it should be an integral part of the DWMP planning process.</p>	<p>Groundwater and groundwater quality is not mentioned or required in the DWMP Framework. Most of the regulatory guidance for groundwater and groundwater quality was released to water companies in summer 2022 when the DWMP was already out for consultation. This will be addressed within WINEP.</p> <p>As our stakeholders are particularly concerned about groundwater, we have responded in Table 5–1 sub–theme, Amending planning objectives.</p> <p>Please refer to our new fDWMP Groundwater Technical Appendix.</p> <p>Completing an SEA on this first DWMP has been challenging, given that environmental impacts are inherently local in nature, but the SEA requires assessment at a strategic level. The importance of impacts on groundwater has been recognised in our SEA and we will continue to work on their inclusion in the next cycle of DWMP. We have also made minor amendments to our SEA</p>
<p>Thames Water does not meet all the targets within Defra’s Storm Overflow discharge reduction Plan. Thames Water proposes over the next 25 years to deliver an annual performance of no more than 10 storm overflows/annum, the other targets regarding storm overflows causing no local adverse ecological impact and bathing waters are not included. Thames Water has made commitments to 14% reduction in duration of discharges by 2025 and 50% reduction in storm overflows by 2030. This has not been reflected in the plan. We expect the plan to include all the storm overflow discharge reduction plan targets in accordance with the milestones, by final publication.</p>	<p>The Storm Overflow Discharge Reduction Plan was published on 26th August 2022 while our DWMP was out for public consultation. We have ensured that our fDWMP is fully aligned with the requirements of the Storm Overflow Reduction plan, as well as the WINEP.</p>
<p>More detail on monitoring requirements, including 100% event duration monitoring (EDM) by the end of December 2023, near–real time reporting and continuous water quality monitoring of overflows.</p>	<p>Due to this comment and verbal EA discussions around improved monitoring we have included in our Next Steps section of The Plan how we believe better information, that will become available with increased monitoring as well as improvements in modelling may change our plan in the future.</p> <p>We have already introduced near real–time publication of EDM data in the Thames area and we</p>



You Said	We Did
	will take the opportunity to improve our plan again in cycle 2 when we expect better data will be available.
<p>We understand that your preferred plan is the 'Resilient Plan' which it is stated ensures an optimum balance across outcomes while keeping plans deliverable and affordable. However, there appears to be a lack of on the ground action until 2035, with the focus on monitoring and modelling your networks. The proposed 150 ha of SuDS proposed across London in AMP8 appears unambitious, as only 30ha per year.</p>	<p>The preferred plan does not delay investment until 2035 but focuses investment up to that period on high-risk areas, where we have certainty of the risk position. Note that with regulatory intervention for storm overflows there is a significant change in regional intervention to account for storm overflow prioritisation. SuDS implementation requires a step change from the level of SuDS delivery currently observed. We have written an additional fDWMP Technical Appendix to demonstrate that our plan is achievable even when considering this step change.</p>
<p>STW which are covered by Groundwater Impact Systems Management Plan for example Witney, which are high profile, and we would have expected to see proposed action within AMP8. Instead, the proposal is to continue to monitor with little action proposed until after 2030. More detail can be found in Annex 1A4 &amp; A5</p>	<p>Groundwater Impacted Systems had been identified in advance of the DWMP and details were recorded in the selected number of catchments presented in the dDWMP. The proposals within the Groundwater Impacted System Management Plans and our fDWMP are aligned. This profiling has also been amended due to the prioritisation requirements of storm overflow reduction plan.</p>
<p>More detail in the Level 2 plans:</p> <ul style="list-style-type: none"> <li>• How improved monitoring, including EDM and continuous water quality of outfalls, will inform adaptive pathways.</li> <li>• Where proposed solutions will be delivered such as the proposed 1,060km of sewers that are to be relined to reduce infiltration along with manhole sealing.</li> <li>• Which groundwater impacted systems will be considered and prioritised</li> </ul>	<ul style="list-style-type: none"> <li>• We have included we have included in our Next Steps section of The Plan how we believe better information, that will become available with increased monitoring as well as improvements in modelling may change our plan in the future. With the level of data currently available and the short timeframe between draft and final DWMP we have not segregated this out to our Level 2 areas.</li> <li>• The identification and representation of the specific locations of interventions is not appropriate for a strategic plan and is likely to</li> </ul>



You Said	We Did
<p>We would wish to see greater detail within the options appraisal regarding the assumptions employed that underpin the justification for the scale of the option within the plan’s best value blend (particularly within London), as well as the anticipated key risks, impacts and mitigation for delivery of the programme. A significant amount of additional background work has been undertaken which is not included within the published information.</p>	<p>change as detailed solution development occurs. We have outlined many of the solution types within the Catchment Strategy Plans both at a Level 2 and Level 3 areas.</p> <ul style="list-style-type: none"> <li>• Groundwater Impacted Systems had been identified in advance of the DWMP and details were recorded in the selected number of catchments presented in the dDWMP. We have a unified view between the GISMPs and DWMP in terms of preferred intervention types.</li> <li>• We have enhanced the fDWMP Options Development Appraisal Technical Appendix and the Programme Appraisal Technical Appendix to demonstrate best value. We have also highlighted some of the vast amount of background work on SuDS delivery in a new technical appendix.</li> </ul>
<p>A high-level evaluation of wider resilience issues, specifically fluvial, coastal flooding and power failure, across all catchments is absent. It is our expectation (and referenced in the DWMP framework) that this will be included.</p>	<p>We have written a new fDWMP Technical Appendix on Resilience. It will outline our approach to fluvial resilience, also included in our Programme Appraisal, and can be found in the Plan.</p> <p>An appropriate Power resilience assessment is not achievable in the time between draft and final and will be addressed in cycle 2.</p> <p>Coastal resilience is relevant to our company even though we don’t have a coastline, due to the tidal nature of the river Thames downstream of Teddington Lock. We have included joint long-term objectives between us and the EA Thames Estuary 2100 (TE2100) team in the new Resilience Technical Appendix. These objectives need to be developed and enhanced in line with TE2100 timelines and we expect a substantial enhancement before the next TE2100 10-year review. Some of them are expected to be reported in cycle 2 of the DWMP.</p> <p>See Regulator comment 2 at the bottom of Table 5–1.</p>
<p>Climate Change has been integrated into your DWMP. However, the plan is not overly ambitious with planning for climate impacts. Sewer and storm overflows are covered, but other impacts are not. Carbon is considered (embodied and sequestered) but is listed as ‘lower priority’ based on customer feedback. Adaptive pathways are mentioned multiple times, although the details are not always outlined. If these details are added, the plan would be strengthened.</p>	<p>Our dDWMP and fDWMP will both demonstrate net carbon emissions linked to the plans’ activities. We have assessed alternative pathways for an adaptive plan considering the impact of a wider range of climate change scenarios, and their associated trigger points, on our DWMP. These will be detailed in Appendix G of our fDWMP. For further info see Table 5–3, sub theme: suggestions for benefits (carbon neutrality) and Table 4, regulator comment 1 (adaptive planning). Impacts of climate change on protected habitats will be considered for cycle 2, noting that this will be statutory, and we may not have the final decision on what gets included or excluded.</p>



You Said	We Did
	<p>Additionally, we have used the Ofwat published guidance on Long Term Delivery Strategies and included the common reference scenarios within our Adaptive Planning assessments. This will be found in the fDWMP Adaptive Planning Technical Appendix.</p>
<p>The inclusion of an Adaptive Pathway plan for flood risk to support both the Level 1 and 2 documents.</p>	<p>Our approach to adaptive planning aligns with Ofwat’s specification for Long Term Delivery Strategies. Further details will be found in the fDWMP Adaptive Planning Technical Appendix and Data Tables. Adaptive plans for each Level 2 area are not achievable in the time between the dDWMP and fDWMP.</p>
<p>The plan would benefit from more detail on how Thames Water will track delivery of solution with partners identified in DWMPs and their success in mitigating risks and achieving identified targets.</p>	<p>Solution and benefit tracking tends to be completed as part of a Price Review and associated Annual Return process. We have initial views from Ofwat in the DWMP Data Table templates that they have released, and we have populated.</p>
<p>Although a SEA was not required for DWMP cycle 1 Thames Water, to its credit, produced an environmental report with the goal of meeting SEA requirements. Even though not a statutory requirement, it would be reasonably expected, as a minimum, appendices setting out the list of plans, programmes and policies which were reviewed and details of the baseline and key environmental issues we would expect to be included in the environmental report. It looks as though a robust methodology was adopted but we found the detail in the appendices to be not easily accessible. A scoping study was not undertaken.</p>	<p>Engagement was undertaken with Natural England and other stakeholders regarding the level of detail to be considered at the strategic plan level. We provided a technical note which set out the methodology which was reviewed by these stakeholders before the draft DWMP was completed. Following further engagement post consultation, the Environment Agency confirmed that the methodology applied is proportionate and appropriately precautionary, recognising the infancy of option development at strategic plan level.</p>



Greater London Authority

You Said		We Did
Engagement	<p>The DWMP is broken down into Catchment Strategic Plans which are useful, but still outline delivery within Water Resource Zones. These are too large in scale to provide sufficient local detail, for example it does not name rivers, provide combined sewer overflow (CSO) references, and does not show local authority or other catchment boundaries in these plans. The DWMP fails to set out how these organisations will engage with the DWMP in the future. The submission of this plan is not the last step in engagement needed with these groups and it should be reflected in the Plan.</p>	<p>The DWMP is a strategic plan and is therefore not designed to provide local scheme or project related detail. Within London, the Plan is segregated into seven Level 3 Catchments with one CSP per catchment. Due to the size of these catchments, they have been further subdivided into Risk Zones (or Level 4) areas. These differ from Water Resource Zones. The aim of presenting information at this level of granularity is 'to describe strategic drivers for change as well as facilitating a more strategic level of planning above the detailed catchment assessments'. The CSPs and specifically the Appendices within the CSP's provide additional risk zone level data. These risk zones include the names of rivers.</p> <p>Since this is the first iteration of the DWMP (or Cycle 1), with an expectation of future cycles becoming statutory, the industry has yet to conclude a suitable future engagement approach. We recognise the importance engagement has made to this cycle and how that engagement has noticeably improved the quality of our first DWMP. We value the engagement, the insight gained, and have a strong desire to increase the level of engagement in future DWMPs. We recognise some partners have struggled with the level of engagement due to their resourcing restrictions.</p>
	<p>Further work is required to engage stakeholders in understandable formats to gain their buy-in.</p>	<p>We acknowledge that our DWMP is rich in data and details. We have developed and continually revise our online DWMP practitioners GIS Portal to provide much of the data in an accessible format that is easy to access for stakeholders. We have used a variety of engagement methods including:</p> <ul style="list-style-type: none"> <li>• Virtual meetings</li> <li>• Webinars</li> <li>• Newsletters</li> <li>• GIS Portals</li> <li>• Topic focussed regional meetings</li> <li>• Local workshops (with 1 or 2 stakeholders)</li> <li>• Briefing sessions</li> </ul> <p>Details of the scale of these activities can be found in the Technical Appendix on Stakeholder Engagement.</p>



You Said		We Did
	<p>Thames Water should look at how they can increase funding beyond £5m to resource partners to develop SuDS schemes to achieve the delivery aspirations in this plan.</p>	<p>For fDWMP, we have a new Technical Appendix on SuDS delivery. The £5m refers to funding for River Catchment Partnerships to increase their resource abilities to support collaborative working. We recognise the significant contribution by the TRFCC who fund the Thames Flood Advisors to support LLFA's to deliver flood risk reduction projects through Flood Defence Grant in Aid and Local Levy funding.</p> <p>See Table 5–3 sub–theme, Deliverability of SuDS and new fDWMP technical appendix – Delivery of SuDS and nature–based solutions.</p>
Evidence and data sharing	<p>Section 14 Learning for cycle 2 of the Draft Plan is very limited in detail. More detail should be provided on the data needed and how it will be collected in the next AMP period to improve future iterations of the DWMP.</p> <p>The plan does not set out a detailed timeline nor costings; it misses the opportunity to align the plan with other relevant work of partners, including that of the Environment Agency and Lead Local Flood Authorities.</p>	<p>Having completed the consultation we are now able to confirm what is part of our fDWMP and what we are working toward for the future. Section 5 of this report document identified several our cycle 2 actions and Section 14 of the fDWMP 'Learning for cycle 2' has been updated to reflect our latest position.</p> <p>Cycle 2 of the DWMP is expected to be statutory and there may be certain specific requirements not yet defined as part of the statutory obligation. See also Table 5–2 regulator comment 2 for details about how our fDWMP aligns with wider wastewater programmes of work.</p> <p>We note clear and strong governmental support for reducing surface water and flood risk through the EA 6–year programme. While regulation would be required to align timeframes, we do not foresee a barrier to co–developing future DWMPs and delivering solutions in partnership due to the misalignment of various national and local plans.</p>



You Said	We Did
	<p>Progress in the sharing of GIS data</p> <p>See Table 5–6 sub–theme, Increase in data sharing.</p> <p>GIS data is available for stakeholders on a GIS portal and all stakeholders who attended engagement workshops were automatically subscribed to the portal as well as others who requested access.</p> <p>The GIS portal will be updated and enhanced in line with the release of our fDWMP.</p> <p>We have a bilateral confidential data agreement that is fully compliant with the Data Protection Act, that we use to share confidential property level flood risk data with partners.</p>
<p>“The aim of stakeholder engagement Aim no 4 is to develop a database of partnership projects to be developed into co funded projects”. However, there is no indication whether the projects within the plan will provide the level of SuDS required, or if further projects are needed.</p>	<p>Whilst the projects developed at draft are encouraging, we need many more partnership projects to meet the needs of the long term. We are in constant dialogue with potential partners to add additional projects as and when they have better information, as well as seeking opportunities directly, ourselves. We have also refreshed the entire partnership list between dDWMP and fDWMP. We will continue to refresh this list and collect more partnership opportunities as they arise.</p> <p>See Table 5–5 sub–theme: Suggestions for partnership working and Table 5–9 sub theme: Increase data sharing.</p>
<p>The Thames Water Independent Review published in 2022 outlines data sharing as one of the key recommendations. We expect that this review, its recommendations, and approach to implementation, which will be addressed in the next Asset Management Period 8 2025– 2029 period, be referenced in the final DWMP plan produced.</p>	<p>We routinely share data with stakeholders and use a variety of means including Environmental Information Requests (EIR’s) and bespoke data sharing agreements.</p> <p>We used both confidential and other non–confidential data agreements as some stakeholders do not have the internal systems and processes to comply with holding confidential data in accordance with the Data Protection Act 2018 requirements.</p> <p>We have created a new fDWMP Technical Appendix detailing work emanating from the Independent Review irrespective of whether it is associated with DWMP activity or not. See Table 5–6 sub–theme, Increase in data sharing.</p>



You Said		We Did
	<p>The DWMP will need to have an ongoing live system which captures projects. In London this could be supported by working with the Greater London Authority and using the Infrastructure Mapping Application (IMA) and sharing both Local Authority and Thames Water projects collected with it.</p>	<p>We have discussed the opportunity to upload data to the GLA Infrastructure Mapping Application. The IMA requires both comprehensive initial data upload (that we can support and facilitate) but also routine update of the data. Some of these data requirements rest with the source or owner of the partnership opportunity and we will therefore need their endorsement to add this data to the IMA. We will work with partners to understand their willingness to make this data available on the IMA.</p> <p>We have hosted partnership opportunities on our GIS DWMP Portal for both London and the Thames Valley as the IMA does not cover our entire operational area.</p> <p>See Table 5–6 sub-theme, Increase in data sharing.</p>
Reducing pollution overflows	<p>Specific targets for individual CSO.</p>	<p>Targets for specific CSO's have been defined by the Storm Overflow Reduction Plan and are in general less than 10 spills per annum.</p> <p>See Table 5–1 sub-theme, Amendment of targets a) storm overflows.</p>
	<p>The DWMP does not identify the CSOs where there is the most impact, nor does the DWMP set out how it aligns with and complements the pollution reduction plan published in Feb 2022.</p>	<p>This first cycle of the DWMP has not included river quality monitoring to better understand impact. This will be addressed by the WINEP.</p> <p>The Thames Water Pollution Incident Reduction Plan<sup>2</sup> focuses on pollution reduction over the short term with a clear focus on reported pollutions. The DWMP predicts change in storm overflow discharges due to population growth and climate change. Integration of our pollution reduction targets with the DWMP will be found in the DWMP Data Tables.</p> <p>See Table 5–1, sub-theme: Amendment of targets a) storm overflows.</p>
Delivery	<p>The DWMP needs to be a “transformative plan,” to deliver the vast number of SuDS (7,200 hectares) required by 2050. To protect 175,619 properties from sewer flooding in the 1 in 50 storm.</p>	<p>We agree that a transformative step change is required to deliver the scale of SuDS for London that we define in the DWMP. To achieve this, a new technical appendix has been added to the fDWMP documentation suite to demonstrate activities recently completed, under development and planned for the future, that supports this transformative change.</p> <p>See Table 5–3, sub-theme: Deliverability of SuDS and new fDWMP technical appendix – Delivery of SuDS and nature-based solutions.</p>

<sup>2</sup> <https://www.thameswater.co.uk/media-library/home/about-us/regulation/pollution-incident-reduction/pollution-incident-reduction-plan-year-three.pdf>  
 Feb 2023

You Said	We Did
	<p>The plan should be clearer on setting out how the funding requirements for the plan relate to the shorter term 5–year funding ask at the next price review. How much will be leveraged from partnership working to ensure best value for customers. It is not clear how much – in financial terms – the plan relies on others.</p>
<p>The plan must be clear on contingency if neither Ofwat nor other delivery partners can provide the funding required to deliver your targets.</p>	<p>Ofwat and the EA have encouraged the industry to view the DWMP as the evidence base for future Price Reviews. This position is confirmed by the Ofwat Final Methodology for PR24, specifically Appendix 9. We have followed this approach for our fDWMP.</p> <p>Additionally, we have a series of DWMP Data Tables that indicate funding breakdown, as well as funding from other sources.</p> <p>See Table 5–2 sub–theme: Regulator comment 1) Base funding vs enhancement costs.</p>
<p>The Mayor seeks reassurance that this plan will be revised to include in the submitted version the detail of delivery for a minimum of the next 5 years, and this detail is not swept aside into the future AMP 8 business proposals submitted to OFWAT which we have less opportunity to engage with.</p>	<p>As our funding and performance is regulated by Ofwat, we cannot deliver programmes of work to meet regulatory pressures outside of those regulated activities. We will strive to continually explore new funding sources and have been discussing options with a Green Finance organisation as part of our River Crane Smarter Water Catchment programme.</p> <p>See Table 5–2, sub–theme: Regulator comment 1) Base funding vs enhancement costs.</p>
	<p>The DWMP is a strategic plan, and it would not be appropriate, nor consistent with the regulatory framework for its production, to include a detailed delivery plan for the next five years within it. Our approach to the fDWMP with respect to our 2025–2030 investment plan is defined by the Ofwat Final Methodology for PR24. We have ensured that our fDWMP meets this requirement. There will be opportunities for Stakeholders to comment on our plans for PR24.</p> <p>See Table 5–1, sub–theme: Change in delivery profile of the plan. See also Table 5–2 regulator comment 2 for details about how our fDWMP aligns with wider wastewater programmes of work.</p>





You Said	We Did
<p>Your DWMP Submission</p>	<p>We recognise the significant benefits that can be gained by the alignment of strategic and policy planning tools. We also recognise that our operational area covers more than 90 Local Planning Authorities and that there is a vast difference between polices across those organisations. For cycle 1 of the DWMP, we purposefully excluded leveraging policy change as an intervention option. We have assessed growth assuming the strict policy requirements as defined in the London Plan are implemented on development sites. We are aware of UKWIR research that may support future tightening of planning policies and are keen to engage with the GLA on how those policies can be incorporated into the London Plan.</p> <p>We have highlighted opportunity for alignment between the DWMP and WRMP in Appendix J as well as in the Adaptive Planning Technical Appendix.</p> <p>Due to high number of Planning Authorities and Lead Local Flooding Authorities we have not aligned all of these plans with our DWMP.</p> <p>We have provided a new fDWMP technical appendix that demonstrates integration between the proposed Strategic Surface Water Plan for London and the DWMP.</p> <p>For further details see Table 5–2.</p>
<p>This Drainage and Wastewater Management Plan needs to include game changing proposals, for example incentives for de-paving and or area-based charging which could provide an incentive to commercial landowners to reduce the amount of run off into sewers.</p>	<p>Area based or volumetric charging for surface water discharge is outside of the scope of a DWMP. We support incentivising landowners to reduce their contribution of surface water to sewers and rivers. We are aware that the London Strategic SuDS Pilot (LSSP) and associated modelling clearly identifies that reducing flows is location specific and highly beneficial in some areas while not beneficial in others. We do not yet have that level of detailed modelling available for the entire Thames Water (or London) region to ensure we are focusing incentivisation in areas where it is necessary and beneficial.</p>
<p>How this DWMP will deliver the scale of work that is needed to address the problems that London faces, quickly enough or how this will be achieved by working in collaboration, needs to be more clearly set out in the final document.</p>	<p>A new technical appendix has been added to the fDWMP documentation suite to demonstrate activities recently completed, under development and planned that support this transformative change.</p> <p>See Table 5–1, sub-theme: Change in delivery profile of the plan and Table 5–5 partnership working.</p>

## Natural England

For all queries on HRA and SEA, we have engaged with Natural England directly to ensure these comments have been addressed in our fDWMP, for details see Section 6. Impacts of climate change on protected habitats will be considered for cycle 2, noting that this will be statutory, and we may not have the final decision on what gets included or excluded. Additional detail is provided in the fDWMP in Technical Appendix D – Options development and appraisal on our solutions, in particular how they deliver multiple benefits including environmental and natural capital performance measures.

You Said	
<b>Habitats Regulations Assessment (HRA)</b>	<p>Rectify deficiencies in the Habitats Regulations Assessment (HRA) – screening to identify all the likely significant effects on habitats sites.</p> <p>List of European sites should also include pSPA, pSAC and pRamsar sites.</p> <p>Stage 1 Screening Assessment – For D7.2 discharge permitting based on bioavailability or ecological impact rather than water quality could have an effect on water quality of European sites, and should therefore be assessed in light of this.</p> <p>Stage 2 Appropriate Assessment – Impacts on European sites should consider effects on functionally linked habitat.</p> <p>A hydrological survey should be undertaken to understand the hydrological links to each designated site within the scope of the DWMP.</p> <p>Include an assessment of adverse impacts individually which compares risk against specific mitigation actions or as an in-combination assessment. As this has not been included it cannot be concluded that an adverse effect from the DWMP is unlikely.</p>
<b>Strategic Environmental Assessment (SEA)</b>	<p>For adaptive planning, include the effects of climate change on protected habitats and species, as their vulnerability to the impacts of Thames Water assets could alter.</p> <p>Provide additional information regarding the source of information used to identify storm overflows which are likely to pose greater risk in the future.</p> <p>Provide details on methodology and reasoning used to exclude options, such as those that would protect SSSIs in West Berkshire.</p> <p>Assess and mitigate potential impacts on important environmental receptors.</p> <p>Fully assess the natural and social capital of the dDWMP options.</p> <p>Address the identified deficiencies in the SEA content and process.          SEA to contain a full scoping report.          SEA to give an indication of what the positive or negative impacts of specific options may be but rather summarises them in a table for each area.</p> <p>In Table 4–2 screening is lacking in detail to be sufficient for a full SEA. No details on which European sites are likely to be impacted MCZs, priority species and protected species have not been included in the SEA.</p> <p>For the water objective there should be a decision guiding question on whether there will be an effect on a European Site which is or will be subject to nutrient neutrality.</p> <p>GSO Assessment – The SEA should demonstrate the effects of specific GSO's against the objectives with details of what positive and negative effects there may be. Potential mitigation methods should be proposed to offset negative impacts with a final severity level given for the construction and operational impacts.</p> <p>Cumulative, Synergistic and Indirect Effects:</p> <ul style="list-style-type: none"> <li>• Cumulative impacts of GSO's to be discussed with current available data.</li> <li>• Not to conclude as no major impact and excluding any SEA topics from the cumulative impact assessment as a full assessment has not been included.</li> </ul>

You Said	
SEA – continued	<ul style="list-style-type: none"> <li>• Include a list of other plans that could potentially have a cumulative impact with the DWMP options such as those proposed to local planning authorities, SRO water transfers between regions and plans from neighbouring water companies.</li> </ul>
	Monitoring: <ul style="list-style-type: none"> <li>• Further detail on monitoring for a full SEA.</li> <li>• When data is not available to detail specific monitoring methodology then there should be high level aims for monitoring which covers limitations highlighted in the current baseline.</li> </ul>
	Protected landscapes in the SEA: <ul style="list-style-type: none"> <li>• The SEA to identify specific landscapes that are at risk and what the impacts might be from potential options.</li> <li>• Mitigation to be proposed.</li> </ul>
	SSSIs in the SEA: <ul style="list-style-type: none"> <li>• SEA to identify specific SSSIs that are at risk and what the impacts might be from potential options.</li> <li>• Mitigation to be proposed.</li> </ul>

### Natural England continued – non HRA & SEA related comments

You Said	We Did	
West Berkshire, Reading, Wokingham, Bracknell Forest, Windsor and Maidenhead, Hampshire and West Sussex	<ul style="list-style-type: none"> <li>• More ambition reduction in storm overflow events and actions to tackle leaking of sewers into surface and ground water to be included.</li> <li>• Options such as sewer lining, and proactive maintenance to help reduce pollution of the Kennet and Lambourn to be included.</li> <li>• More options included to protect the Kennet and Lambourn from Thames Water assets to be included, as well as an explanation of why options have been selected or rejected in West Berkshire.</li> </ul>	<p>We have engaged with Natural England directly to ensure this comment has been addressed in our fDWMP.</p> <p>See Table 5–1 sub–theme, Amendment of targets and Table 5–3, sub–theme: suggestion for a solution.</p>
The Draft Plan	<ul style="list-style-type: none"> <li>• More detailed description to be included in the overall plan for the scenarios listed in table 6.1 customer preference weighting.</li> <li>• Post–consultation engagement of the development of each scenario before the final DWMP is published.</li> </ul>	<p>Customer research has now been completed and is summarised in Appendix D.</p>
Technical summary	<ul style="list-style-type: none"> <li>• The target set for environmentally sensitive areas should be more ambitious than a maximum of 10 storm overflows annually, particularly when there is a record of storm overflows having an adverse impact.</li> <li>• Font in Figure 3–1 difficult to read. Please amend.</li> </ul>	<p>We have compiled with the Environment Act 2021 and subsequent government policy.</p> <p>See Table 5–1, sub–theme Amendment of targets.</p> <p>This Figure will be amended for our fDWMP.</p>

Ofwat

You Said	We Did
<p>In your fDWMP, include details of adaptive planning across the whole DWMP, including testing of the common reference scenarios and trigger points to demonstrate how the plan would adapt to factors such as climate change.</p>	<p>To be included in our fDWMP.            See Table 5–1 sub–theme, Regulator comment 1) Adaptive planning.</p>
<p>Provide clarity on what elements of your plan you consider to be base or enhancement activities. Clearly set out how asset management and optimisation (base expenditure activities) can address some risks, such as, providing additional hydraulic capacity headroom in the system, as part of a hierarchy of options, before recommending enhancement schemes. Ensure that you are able, and continue to be able, to meet all legal obligations, both now and in the future.</p>	<p>We have completed a scope of work to fully understand the impact of base expenditure and have integrated that into a new Technical Appendix in our fDWMP called 'What Base Buys'.            Our enhanced understanding is also reflected in the Data Tables that are also to be part of our fDWMP.            See Table 5–2 sub–theme, Regulator comment 1) Base funding vs enhancement costs.</p>
<p>For decision making and option appraisal, clearly demonstrate different options. Compare the preferred plan with other options, including a least cost plan, to demonstrate how you are achieving the best value in your final DWMP.</p>	<p>We have provided further clarity on how we have developed the plan and how we have proposed a best value profile to achieve our targets, in our fDWMP. See Table 5–2 – Evidencing best value.</p>
<p>Provide further evidence in respect of costs and benefits of solutions, particularly schemes that deliver multiple benefits.</p>	<p>We have provided additional detail in fDWMP Technical Appendix D – Options development and appraisal on our solutions, in particular how they deliver multiple benefits.            See Table 5–3 sub–theme, Regulator comment 1) Delivery of multiple benefits.</p>
<p>Provide convincing evidence in final DWMP on why alternative options were discounted.            Include greater clarification in your final DWMP on how multiple benefit solutions are being considered, how they compare to alternatives, and how this has evolved since the dDWMP.</p>	<p>We have provided further detail in our fDWMP on the cost and benefits of solutions, this includes:</p> <ul style="list-style-type: none"> <li>• How multiple benefits have been considered in developing the best value.</li> <li>• Evidence where alternative options have been discounted.</li> </ul> <p>This will also be addressed by the Data Tables in the fDWMP and the narrative about the Preferred Plan.</p>
<p>In final DWMP, include the potential scale of co–funding and the likelihood of these potential opportunities materialising.</p>	<p>This data is to be provided within the data tables that are part of the fDWMP.</p>
<p>In final DWMP, provide further detail on the likelihood of your partnership schemes going ahead, including timelines for delivery and the split in funding contributions, and be clear on the rationale for not progressing such schemes, where applicable.</p>	<p>We have developed additional content to sit within the fDWMP which will demonstrate how we believe partnership working can be made more successful. See Table 5–5 – Partnership working.</p>
<p>Also include details of the feedback provided from the dDWMP consultation, as well as any further stakeholder engagement undertaken between draft and final submissions.</p>	<p>This 'You Said. We Did' Technical appendix is provided in response to this comment.</p>

You Said	We Did
<p><b>Storm overflow reduction</b></p> <ul style="list-style-type: none"> <li>• Provide details on how many sensitive overflows there are and where they are located.</li> <li>• Include a more evolved version of a constrained profile including a robust timeline (showing milestones and prioritisation) and evidence on the costs for these storm overflow schemes in final DWMP.</li> <li>• Provide clarity of how SuDS are being valued, as well as a comparison of the use of SuDS against alternative solutions (for example least cost), to better demonstrate what is best value. Where nature-based solutions are not considered feasible, provide the rationale as to why these options have been discounted.</li> <li>• Mention the requirements to undertake water quality monitoring of sewer overflows. Provide detailed evidence on your approach and milestones to achieve the water quality monitoring requirement as part of your final plan.</li> </ul>	<p>See Table 5–1 sub-theme, Amendment of targets a) storm overflows and Table 5–3, sub-theme: Deliverability of SuDS.</p> <p>Locations of sensitive overflows were developed and submitted as part of the WINEP. We have signposted this work in our fDWMP.</p> <p>The constraint profiling for storm overflow reduction was defined by the EA WINEP Spills Driver Guidance and have been fully implemented.</p> <p>Our assessment of green engineering being more beneficial than grey engineering has been completed; see the fDWMP Programme Appraisal technical appendix.</p> <p>We have included the Environment Act requirements on water quality monitoring as a specific scenario in our fDWMP Programme Appraisal Technical Appendix.</p>
<p><b>Costing, funding and affordability considerations</b></p> <ul style="list-style-type: none"> <li>• Provide the costs to indicate the impact on customer bills based on preferred plan or any other scenario.</li> <li>• Set out a range of scenarios and likely impact on affordability and bills for customers and stakeholders.</li> <li>• Include breakdown of potential bill impacts for each scenario that will address Thames Water and customers’ priorities to achieve planning objectives by appropriate timescales.</li> <li>• Plan to set out what improvements can be achieved through base funding prior to additional enhancement expenditure in final plan.</li> <li>• Provide further clarity on the timeline and forecast expenditure for each planning objective and the associated monetised benefits.</li> </ul>	<p>At draft we provided bill impact information as part of the consultation questionnaire. In the final more of this data will be visible in the upfront documents.</p> <p>For our fDWMP, there will be a new Technical Appendix entitled “What Base Buys”, that holds some additional information on base improvement funding. We did not produce information on monetised benefits, this requires substantial customer research. There has been insufficient time available to produce this for the fDWMP. We will incorporate this into our approach for cycle 2.</p>
<p>In addition to lessons learnt, consider the responses to dDWMP consultation and include how these have influenced final DWMP.</p>	<p>This is demonstrated in this ‘You Said. We Did’ technical appendix.</p>
<p>Provide details of any third-party assurance of the DWMP plan or any contributing processes. Ensure that a full Board Assurance statement is also provided as part of your final DWMP submission, and confirmation of any additional assurance.</p>	<p>The TWUL Sub Board Assurance statement of the dDWMP was included as a technical appendix to the dDWMP – Appendix M TWUL Board Assurance Statement.</p> <p>A third-party assurer has been procured to assess the fDWMP and a statement assuring the fDWMP will be included with the revised submission.</p>





## Members of Parliament

We are preparing detailed response letters to MPs that kindly responded to our consultation. This will provide them with a comprehensive response to all the comments they raised. The following table provides a summary of our responses to the points they raised.

You Said	We Did
<p>I welcome this draft plan as a step towards those solutions. The aims of protecting the environment, improving the health of our rivers, increasing resilience to the risk of flooding and generating wider community benefits are ones I wholeheartedly support. However, while the plan sets out analysis of the risks and costs, it provides little to no reassurance of actions that will be taken beyond the broad regional aims.</p>	<p>The development of solutions has purposefully been at a strategic level as the DWMP is a strategic plan. It is used to determine the cost, scale and extent of investment required to address the issues. Development of local, detailed, and site-specific plans will follow as part of our routine business planning processes. Please see Table 5–4.</p> <p>We have increased the amount of information available for the preferred plan in the fDWMP to demonstrate what it aims to deliver. We have also increased signposting within the fDWMP documentation to point readers to where they can find more detail. The CSPs in our fDWMP provide sub-catchment detail about the actions we propose.</p> <p>This is the first iteration of our DWMP. In future iterations we will enhance the level of detail within it, as the plan and future cycles of the planning programme develop.</p>
<p>Chertsey STW catchment area in Surrey faces some of the greatest risks of sewer flooding and is greatly impacted by issues of water quality. Yet as currently framed there is no clear indication these risks will begin to be mitigated before 2035, which risks letting down residents and business who need assurance and clarity that action will be taken to reduce the risk they face. To have confidence in the DWMP there needs to be greater clarity on how these risks will be managed and prioritised.</p>	<p>We have revised the profile of investment due to the regulatory requirements for storm overflows. We have balanced our investment across our entire area. The balance between investment need, deliverability and affordability will remain challenging. We have updated the Catchment Strategy Plan accordingly with the revision.</p> <p>We have reviewed feedback relating to a lack of detail in our dDWMP in Table 5–4, sub theme lack of detail.</p> <p>Queries on solution prioritisation are addressed in Table 5–3. We have considered feedback provided on how we could prioritise solutions differently. We have collated these potential changes to the approach and will include development of them in our preparatory work for our next DWMP (Cycle 2).</p>

You Said	We Did
<p>The DWMP sets out that the challenges for the Thames Valley (outside London) region, are:</p> <ul style="list-style-type: none"> <li>• Groundwater infiltration due to chalk geology</li> <li>• Misconnections of foul to surface water at property level</li> <li>• Low density housing means external flooding is more prevalent than internal</li> <li>• Very high sensitivity rivers</li> </ul> <p>Due to this assessment, it states the asset strategy is to 'fundamentally tackle the inputs to the systems in this region. Our strategic intent for this asset base is to aggressively target unwanted flows (groundwater and surface water) in our foul only' sewerage system to restore headroom, by relining sewers to reduce groundwater infiltration, manhole sealing and replumbing surface water misconnections. Yet Figure 5–7 (page 49), appears to show that less than 1% of funding within Surrey will be used for sewer lining to target infiltration hotspots, while only one of the 4 challenges are applicable to my constituency. I believe this highlights the difficulty, and near impossibility of developing a strategic management plan based on geographic area alone.</p>	<p>Sewer Lining is one of many interventions that are appropriate to better control, restrict or remove unwanted flow from our sewers. In many locations, sustainable urban drainage is the preferred option. We have therefore used a combination of both sewer lining and SuDS for Surrey, especially as SuDS provide a host of alternative benefits (biodiversity, wellbeing etc.).</p> <p>Our existing suite of tools (models) contain local variation, including seasonal rainfall patterns, housing density and infiltration variances. We are continually trialling alternative approaches that can improve the range of local variable factors we can incorporate into future modelling (see below).</p> <p>We have considered the known issues in our catchments and selected the most appropriate options to address these. The challenges we face vary geographically so the solutions we adopt, which are set out in our CSPs, must also vary spatially. Further detail of the options selected for each catchment will be added to our fDWMP.</p> <p>We have reviewed and summarised all general feedback in Table 5–4.</p>
<p>Within Surrey alone there are vast differences in geology, topography, risk profile and population density. With such a variety across Surrey, let alone the whole Thames Valley region, more clarity is needed about not only how risks are identified but how these will be prioritised. Currently the DWMP is a 25–year plan that does not set out how Thames Water will prioritise those areas in greatest need, beyond the broad regional level, nor envisage improvements being delivered in full until 2050</p>	<p>For this first cycle of the DWMP, the prioritisation is based on the tools and models we have available. We have prioritised reduction of storm overflows as per EA Driver Guidance for WINEP. Many of the prioritisation activities will be repeated and enhanced as we complete subsequent DWMPs. We will also investigate new models and technologies that can assist with this and have collaborated with Academic Partners on a few promising trials, most recently a tool called WSIMOD (Water Systems Integrated Modelling Framework) that may be useful in the future.</p>
<p>It is of great concern that no river in Surrey is rated good for water quality and that all rivers in Runnymede and Weybridge are rated as either moderate or poor for water quality.</p>	<p>We share the concern for the environment and rivers in Surrey. We aim to be more sustainable in all areas of our business and reduce the impact our activities have on the environment. We're proud of the progress in the last year and continue to work hard to deliver for our customers and the environment.</p>
<p>In terms of protecting our rivers, the DWMP states that if we don't act, modelling predicts that growth and climate change would impact on our storm overflow performance with 65% of L3 catchments having a spill rate &gt;10 spills per annum per overflow to rivers including the Lower Thames, Wey, and Mole.</p>	<p>The DEFRA published Storm Overflow Reduction Plan and our response, as defined in the final version of the DWMP demonstrates how we will reduce storm overflows to &lt;10 per annum, in line with Government targets.</p>

You Said	We Did
<p>While all water quality is important, poor water quality in some rivers will have a greater impact on local communities. The DWMP highlights the risks relating to population growth and an increase in tourism across the region, which will place pressure on our sewer network. But does not appear to assess usage of waterways in a similar way when considering the impact of water quality. Where there is high recreational use of waterways, poor quality will have a significantly higher impact on public health and on businesses that facilitate this use.</p>	<p>We have amended our prioritisation of investment specifically to account for this (and as required by regulators). The amenity of watercourses is one of the factors used in our assessment to understand where to invest first for storm overflow reduction. Sites considered sensitive are prioritised within our sewer overflow reduction plan to be addressed sooner. Designated Bathing Waters are also prioritised. Further details of this prioritisation will be added to our new fDWMP technical appendix on Storm Overflows.</p>
<p>As part of the planning for the DWMP, modelling should be done to map rivers by public usage, and potential impact on public health. I have not seen evidence of this work having been done and I believe this should be a serious consideration when prioritising which actions will have the greatest impact. Thames water should provide information regarding this endeavour, and affirm that areas of high river usage will be prioritised for works to improve water quality.</p>	
<p>I absolutely welcome the aims of the plan to:</p> <ul style="list-style-type: none"> <li>• Reduce the numbers of customers at risk of internal and external hydraulic sewer flooding in a 1 in 50–year storm by 100%;</li> <li>• Reduce spills (where overflows are present) to &lt;10 in a typical year; and</li> <li>• Maintain 100% STW permit compliance</li> </ul> <p>However, I am concerned that the plan does not set out steps to mitigate this risk until the latter stages, currently scheduled for 2035–2050.</p>	<p>We recognise that there are areas that currently need improvement and have therefore balanced our plan across our region to ensure those communities with the greatest need are addressed early in the plan. We need to balance the cost and deliverability of the plan as well. For this reason, we have created additional investment scenarios, demonstrating the effects of an accelerated plan.</p> <p>Additionally, our regulators have defined specific deliverables on storm overflows in a prioritised and defined order. This changes the plan details for many areas.</p>
<p>The Surrey Strategic Plan sets out that it is not until 2035 at the earliest that work would begin to reduce the risk of hydraulic sewer flooding by removing rainfall run off into our systems through the catchment–wide planning and implementation of surface water management solutions, and by provide sewer network enhancements to meet growth and climate change drivers.</p> <p>Given the impact sewage flooding is already having in the Chertsey catchment area, I do not believe a wait of 10 years into the new plan can be justified before work commences to reduce the current risk faced.</p>	<p>For further details see Table 5–1, sub theme: change in delivery profile of the plan.</p>
<p>I know Thames Water and its partners are committed to bringing about improvements, and I am sure there must be work ongoing not included in this summary timeline to help address the issues I have repeatedly been raising on behalf of constituents. Suggestions that the priority for the first 5 years would be to 'increase the confidence in plans for long term investment' are likely to lead to accusations of lack of action, or concern these issues are not being addressed swiftly or adequately.</p>	



You Said	We Did
<p>I note this consultation is on the detail set out in the DWMP, and that plans for more localised areas within the Thames Valley region are still in development. However, given the summaries are published as part of the DWMP, I would welcome further detail regarding these plans and what measures could be implemented in the short and medium term.</p>	<p>In general, a DWMP is a strategic level plan that does not hold scheme or project level data. We have produced regional Catchment Strategy Plans (CSPs) and enhanced the material within them. Further detail will be developed as part of 5–year business planning process.            Please also refer to Table 5–4. and Table 5–6.</p>
<p>I welcome the commitment to partnership working and agree this is vital to achieve maximum impact. However, from my experience of issues around addressing sewage flooding in particular, the best outcomes can only be achieved when there are clear roles and responsibilities set out. I would therefore welcome a commitment to this being published as part of any project for joint ventures.</p>	<p>Partnership working is important to us. We are continually looking for ways and approaches we can use to improve engagement in this area. For our fDWMP, there will be an additional technical appendix that demonstrates our direction of travel on Partnership Working, including some of the specific activities we have and will undertake to improve how we do it. See Table 5–5 – Partnership working.</p>
<p>The DWMP also sets out a commitment to stakeholder engagement which I also welcome. I note the Surrey catchment strategic plan makes two references to the Addlestone Bourne catchment flood alleviation scheme as a joint project between Thames Water and the Environment Agency. As the Addlestone Bourne runs through my constituency I was surprised I have received no communication regarding this project despite regular and recent communication with both organisations, and there appears no public information available. I wonder if this refers to the work being undertaken by the River Thames Scheme (RTS). I would be grateful if further details and confirmation if it falls within the scope of RTS, or if a separate project, further details and how it may affect Runnymede and Weybridge.</p>	<p>Information has been provided as requested in a letter. The activities we have been engaged in for the Addlestone Bourne are neither within the DWMP or the River Thames Scheme.</p>
<p>I would welcome further information of how plans between catchment areas interact, and what cooperation exists between areas. For example, plans for Mogden catchment area risk zone 7 also affect Runnymede and Weybridge as it includes the areas across the River Thames, and areas that manage sewage treatment and discharges in areas upstream of our rivers also have a direct impact on water quality. Is there a mechanism for measuring the cumulative impact of action taken by each catchment area on the waterways they affect?</p>	<p>We use a “Systems Approach” in operating, planning, and investing in our catchments. This transcends administrative and political boundaries yet ensures that interactions are well understood and integrated in our approach. We have not completed dedicated detailed river water quality monitoring as part of this cycle of the DWMP, as this has been the responsibility of the EA to date. In future this will be a new statutory obligation on the water industry and is likely to be specified as a requirement in future cycles of the DWMP.            We are working with the Environment Agency, Natural England, River Catchment Partnerships, and other stakeholders to protect water quality in our rivers, this includes ensuring our plan for the protection of the water environment is optimised holistically.</p>





You Said	We Did
<p>The DWMP notes plans for improvement works to 4 sewage treatment facilities in Surrey, however this does not include those in or near Runnymede and Weybridge. During the past year I have visited our recent facilities and have been informed of the need for improvements and upgrades. I of course hope that the omittance of these works in the 2025–50 plan is on the basis they are hoped to have been completed before this but would be grateful for confirmation this is the case.</p>	<p>In this first cycle of the DWMP, upgrades to treatment works are focused on capacity to accommodate growth and climate change. The DWMP does not cover all investment requirements at treatment works, most specifically capital maintenance.</p>
<p>It is important that the final plan balances the needs across Surrey, but also addresses the most high-risk areas now. It must be affordable, deliverable and achieve outcomes that will deliver maximum benefit for residents, businesses and the environment. These factors need to be considered at each stage of the plan, and not only what meets these aims by the end of the 25-year period.</p>	<p>The balance of need has been completed across our whole area. We support the need for affordability and deliverability.</p> <p>We have addressed comments on requested changes to the delivery profile of the plan in Table 5–1. The narrative of milestones will be enhanced in our fDWMP.</p>
<p>We need to be able to deliver improvements for those most affected in at least the medium term. Failure to do so will leave residents and businesses struggling with unacceptable regular and repeated issues of sewage flooding in particular.</p>	<p>We need to balance our proposed investment for both those most affected as well as ensuring that it is delivered efficiently. We expect that in future cycles of the DWMP we will continually enhance our plan to ensure that both factors are addressed. In addition, we have amended the delivery profile in line with statutory requirements, specifically on storm discharges. Finally, alternative scenarios have been developed and considered to understand the impact of an accelerated delivery programme. The alternative scenarios will be found in the fDWMP Programme Appraisal and Adaptive Pathways Technical Appendices.</p>





## Glossary

Term	Description
1 in 30-year storm	A storm that has a 1 in 30 chance (3.33% probability) of being equalled or exceeded in any given year. This does not mean that a 30-year flood will happen regularly every 30 years, or only once in 30 years.
1 in 50-year storm	A storm that has a 1 in 50 chance (2% probability) of being equalled or exceeded in any given year. This does not mean that a 50-year flood will happen regularly every 50 years, or only once in 50 years.
Asset Management Plan (AMP)	A five-year planning cycle used by English and Welsh water industry regulators to set allowable price increases for privately owned water companies and for the assessment of performance indicators such as water quality and customer service.
Baseline Risk And Vulnerability Assessment (BRAVA)	Following Risk Based Catchment Screening (RBCS), more detailed risk assessments on those catchments where we believed there was an adverse risk to performance over time. We modelled their performance to 2020 (baseline), 2030, 2035 and 2050.
Business Plan	Business Plans are produced by water companies every 5 years. They set out their investment programme to ensure delivery of water and wastewater services to customers. These plans are drawn up through consultation with the regulators, stakeholders and customers and submitted to Ofwat for detailed scrutiny and review.
Catchment Strategic Plans (CSPs)	Summary reports to promote system thinking across large wastewater catchments. These provide early sight of our final plans enabling co-authoring opportunities for our stakeholders. Each document outlines the challenges that the catchment will face in the future and the long-term plans to address these issues.
Combined sewer	A sewer designed to receive both wastewater and surface water from domestic and industrial sources to a treatment works in a single pipe.
Customer Challenge Group (CCG)	An independent body that challenges both our current performance and our engagement with customers on building our future plans.
Cycle 1 and Cycle 2 DWMP	Our current DWMP is referred to as Cycle 1, it covers a planning period of 2025-2050. Our next plan will be published in five years' time and is referred to as our Cycle 2 DWMP, it will cover a planning period of 2030-2055.
Department for Environment, Food and Rural Affairs (Defra)	UK government department responsible for safeguarding the natural environment, food and farming industry, and the rural economy.
Drainage and Wastewater Management Plan (DWMP)	A Drainage and Wastewater Management Plan (DWMP) is ' <i>a long-term strategic plan that sets out how wastewater systems, and the drainage networks that impact them, are to be extended, improved and maintained to ensure they are robust and resilient to future pressures</i> '. The planning period is 25 years, from 2025 to 2050. DWMP is iterated every five years; the first known as 'Cycle 1', published as a final plan in May 2023.
dDWMP	The draft version of the Drainage and Wastewater Management Plan, published in June 2022 <sup>3</sup> .
fDWMP	The final version of the Drainage and Wastewater Management Plan, to be published in May 2023.

<sup>3</sup> <https://www.thameswater.co.uk/about-us/regulation/drainage-and-wastewater-management>

Term	Description
Dry Weather Flow (DWF)	Dry Weather Flow is the average daily flow to a Sewage Treatment Works (STW) during a period without rain.
Environment Agency (EA)	UK government agency whose principal aim is to protect and enhance the environment in England and Wales.
EA Pollution Categories 1 to 3	<p>Category 1 incidents have a serious, extensive or persistent impact on the environment, people or property.</p> <p>Category 2 incidents have a lesser, yet significant, impact.</p> <p>Category 3 incidents have a minor or minimal impact on the environment, people or property with only a limited or localised effect on water quality.</p> <p>Further Ofwat guidance available here: <a href="#">WatCoPerfEPAMethodology v3-Nov-2017-Final.pdf (ofwat.gov.uk)</a></p>
Event Duration Monitoring (EDM)	Event duration monitoring (EDM) measures the frequency and duration of storm discharges to the environment from storm overflows.
External hydraulic sewer flooding	<p>External flooding occurs within the curtilage of a property due to hydraulic sewer overload.</p> <p>Further Ofwat guidance available here: <a href="#">Reporting-guidance-sewer-flooding.pdf (ofwat.gov.uk)</a></p>
Foul sewer	A foul sewer is designed to carry domestic or commercial wastewater to a sewage works for treatment. Typically, it takes wastewater from sources including toilets, baths, showers, kitchen sinks, washing machines and dishwashers from residential and commercial premises.
Grey infrastructure	New sewers, sewer upsizing and attenuation storage to provide additional capacity in the wastewater networks. Also covers new pumping stations, rising mains and/or civil structures at STWs.
Green infrastructure	Sustainable surface water management solutions, including sustainable drainage systems (SuDS), that are designed to mimic naturally draining surfaces. Typically applied to surface water or combined sewerage systems, but can also be applied to land, highway or other forms of surface drainage.
Historic England (HE)	A non-departmental public body of the government whose aim is to protect the historical environment of England by preserving and listing historic buildings, ancient monuments.
Hydraulic overload	Hydraulic overload occurs when a sewer or sewerage system is unable to cope with the receiving flow.
Internal hydraulic sewer flooding	<p>Flooding which enters a building or passes below a suspended floor caused by flow from a sewer.</p> <p>Further Ofwat guidance available here: <a href="#">Reporting-guidance-sewer-flooding.pdf (ofwat.gov.uk)</a></p>
L2 Area (Strategic Planning Area)	An aggregation of level 3 catchments (tactical planning units) into larger level 2 strategic planning areas. The level 2 strategic planning areas allow us to describe strategic drivers for change (relevant at the level 2 strategic planning area scale) as well as facilitating a more strategic level of planning above the detailed catchment assessments.
L3 Catchment (Tactical Planning Unit)	Geographical area in which a wastewater network drains to a single STW. Stakeholders may be specifically associated with this area. Includes for surface water sewerage that may exist which serves the wastewater geographical area but drains to a water course.
Lead Local Flood Authorities (LLFAs)	LLFAs are Risk Management Authorities as defined by the Flood and Water Management Act 2010. They have statutory duties with respect to flood risk

Term	Description
	management, investigating flooding and the compilation of surface water management plans.
Long-Term Delivery Strategy (LTDS)	A requirement by Ofwat on water companies, to ensure that short term expenditure meets long term objectives for customers, communities, and the environment. These will be submitted as part of the Price Review.
Misconnections	Misconnections are where either surface water drainage or foul water is connected to the wrong system e.g., surface water to foul only or foul to surface water systems.
Natural capital accounting	The process of calculating the total stocks and flows of natural resources in a given system, either in terms of monetary value or in physical terms.
Natural England (NE)	A non-departmental public body sponsored by the Department for Environment, Food and Rural Affairs to protect the natural environment in England, helping to protect England’s nature and landscapes.
Non-governmental organisation (NGO)	An organisation that operates independently of any government, typically one whose purpose is to address a social or political issue.
Options Development and Appraisal (ODA)	A method to focus the level of planning effort, i.e., proportionate to the risks identified, with a view to providing a measure of consistency across the industry.
Ofwat	The regulatory body responsible for economic regulation of the privatised water and wastewater industry in England and Wales.
PR24	<p>Every five years, water companies set out their plans for what they’ll deliver and how much they’ll charge customers<sup>4</sup>. Their plans over the next five years should include how they will:</p> <ul style="list-style-type: none"> <li>• Provide a safe and clean water supply</li> <li>• Provide efficient sewerage pumping and treatment services</li> <li>• Control leaks</li> <li>• Install meters</li> <li>• Maintain pipes and sewers</li> <li>• Maintain and improve environmental standards</li> </ul> <p>This process is known as the price review, and the next one will be in 2024, when Ofwat will make its final decisions. We call this PR24.</p>
Risk-Based Catchments Screening (RBCS)	A first-pass screening exercise of catchment vulnerability against 17 different risk indicators. To understand which catchments are low risk catchments and those that are likely to be at risk in the future if not supported by our long-term plan.
Risk Management Authorities (RMAs)	Authorities responsible for Flood Risk as defined in the Flood and Water Management Act 2010. These include, Lead Local Flood Authorities, Highway Authorities, Local Planning Authorities, Natural England and the Environment Agency.
Sewage Treatment Works (STW)	A sewage treatment works receives and treats wastewater to a standard legally agreed with the Environment Agency, before it is released back into the environment.
Specific, Measurable, Achievable, Relevant, and Time-Bound (SMART)	A framework for setting effective targets.

<sup>4</sup> <https://www.ccwater.org.uk/priorities/price-review/>

Term	Description
Storm overflow discharges	Storm overflows are used to manage excess flows, which typically occur as a result of heavy rainfall. Excess flow that may otherwise have caused flooding is released through a designated outfall to a water course, land area or alternative drainage system.
Strategic Environmental Assessment (SEA)	A systematic decision support process to ensure that environmental and other sustainability aspects are considered effectively in policy, plan and programme making.
Surface water sewer	A surface water sewer collects rainwater from domestic and commercial roofs, driveways, patios etc to a local watercourse or suitable surface water drainage system.
Sustainable Drainage systems (SuDS)	Drainage solutions that provide an alternative to the direct channelling of surface water through networks of pipes and sewers to nearby watercourses. SuDS aim to reduce surface water flooding, improve water quality, and enhance the amenity and biodiversity value of the environment. SuDS achieve this by lowering flow rates, increasing water storage capacity and reducing the transport of pollution to the water environment.
Thames Regional Flood and Coastal Committee (TRFCC) area	The TRFCC area was established by the Environment Agency under the Flood and Water Management Act 2010 that brings together members representing the Constituent Authority. Featured TRFCCs are listed here on our DWMP portal: <a href="https://www.arcgis.com">Drainage and Wastewater Management Plan (arcgis.com)</a>
Water Industry National Environmental Programme (WINEP)	The framework under which Defra and the EA require environmental improvements to be delivered by water companies. Guidance is released by regulators, which water companies interpret for their geographical area, and resubmit the outputs back to regulators for endorsement.



## Navigating our DWMP

We’ve developed a comprehensive document suite to share our final DWMP. This includes five summary documents that contain increasing levels of detail. To help you to navigate around our document suite and to find key DWMP content, we provide a Navigation index below and on our DWMP webpage. The orange cells refer to where key DWMP content can be found across our final document suite.

Navigation index		Protecting the environment and providing a reliable, sustainable wastewater service					Best value and delivery					Working together		DWMP stages and data						
		Storm overflows	Sewer flooding	Level of ambition & pace of delivery	Growth & climate change	Resilience: flooding & power	Groundwater	Environmental assessments	Affordability & bill impact	Best Value	Base vs Enhancement	Solutions & deliverability	Programme alignment	Partnership working	Stakeholder & customer engagement	DWMP stages & process	Level 2 regional summaries	Level 3 regional summaries	Data tables	Risk & Assurance
Summary documents	Customer summary																			
	Non-technical summary																			
	Technical summary																			
	The Plan																			
	Catchment Strategic Plans x13																			
Technical appendices x11	Appendix A - Strategic context																			
	Appendix B - Risk-Based catchment screening																			
	Appendix C - Baseline risk and Vulnerability assessment																			
	Appendix D - Options development and appraisal																			
	Appendix E - Programme appraisal																			
	Appendix F - Stakeholder engagement																			
	Appendix G - Adaptive pathway planning																			
	Appendix H – Customer engagement Part A – Draft DWMP																			
	Appendix I - Risk and uncertainty																			
	Appendix J - DWMP and WRMP alignment																			
Appendix M - Assurance																				
New technical appendices x9	Appendix N - You Said, We Did (YSWD)																			
	Appendix O - What base buys																			
	Appendix P - Response to July 2021 Floods																			
	Appendix Q - Storm overflows																			
	Appendix R - Delivery of SuDS and nature-based solutions																			
	Appendix S - Partnership opportunities and working																			
	Appendix T - Groundwater quality																			
	Appendix U - Resilience																			
	Appendix V – Customer engagement Part B – Consultation Survey Report																			
Environmental assessments	Appendix K - Strategic environmental assessment (SEA)																			
	Appendix L - Habitats regulations assessment (HRA)																			
Portals and data	Customer portal																			
	Practitioner portal																			
	Data tables																			
	Data tables commentary																			



We welcome your views on our DWMP. Please share them with us by emailing:  
[DWMP@thameswater.co.uk](mailto:DWMP@thameswater.co.uk).

*This document reflects our DWMP 2025-2050 as published in May 2023.*

