

March 2023

**Strategic regional water
resource solutions:
standard gate two draft decision
for Thames to Affinity Transfer**

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1. Introduction

The purpose of this publication is to set out our draft decision about whether the Thames to Affinity Transfer (T2AT)¹ solution should continue to receive development funding². The solution owners, Thames Water and Affinity Water, submitted their standard gate two reports on 14 November 2022 for assessment. Further information concerning the background and context of the Thames Water and Affinity Water T2AT can be found in the T2AT publication document on the Affinity Water website³.

This publication should be read in conjunction with the draft decision letter issued to each solution owner. Both this document and draft decision letters have been published on our website.

The assessment process is overseen by RAPID, with input from the partner regulators Ofwat, the Environment Agency and the Drinking Water Inspectorate. The Environment Agency together with Natural England, have reviewed the environmental sections of the submissions, and provided feedback to RAPID. The Consumer Council for Water provided input to the assessment on customer engagement.

The solution owners and other interested parties can now respond to the draft decision. Representations are invited by email to rapid@ofwat.gov.uk and the representation period will close at 6pm on 11 May 2023. All representations will be considered before our final decision is published at 10am on 28 June 2023.

We will publish representations on our website at www.ofwat.gov.uk/regulated-companies/rapid, unless you indicate that you would like your representation to remain unpublished. We will also share representations with our partner regulators, Ofwat, the Environment Agency and the Drinking Water Inspectorate and with Natural England. Subject to the following exceptions, by providing a representation to this consultation you are deemed to consent to its publication.

If you think that any of the information in your response should not be disclosed (for example, because you consider it to be commercially sensitive), an automatic or generalised confidentiality disclaimer will not, of itself, be regarded as sufficient. You should identify specific information and explain in each case why it should not be disclosed (and provide a redacted version of your response), which we will consider when deciding what information to publish. As minimum, we would expect to publish the name of all organisations that provide a written response, even where there are legitimate reasons why the contents of those written responses remain confidential.

¹ Referred to in PR19 final determination as “Thames Water – Affinity Water transfer”

² [PR19 final determinations: Strategic regional water resource solutions appendix](#)

³ [Thames to Affinity Transfer](#)

In relation to personal data, you have the right to object to our publication of the personal information that you disclose to us in submitting your response (for example, your name or contact details). If you do not want us to publish specific personal information that would enable you to be identified, our [privacy policy](#) explains the basis on which you can object to its processing and provides further information on how we process personal data.

In addition to our ability to disclose information pursuant to the Water Industry Act 1991, information provided in response to this consultation document, including personal data, may be published or disclosed in accordance with legislation on access to information – primarily the Freedom of Information Act 2000 (FoIA), the Environmental Information Regulations 2004 (EIR) and applicable data protection laws.

Please be aware that, under the FoIA and the EIR, there are statutory Codes of Practice which deal, among other things, with obligations of confidence. If we receive a request for disclosure of information which you have asked us not to disclose, we will take full account of your explanation, but we cannot give an assurance that we can maintain confidentiality in all circumstances.

We would like to thank Thames Water and Affinity Water for the level of engagement, collaboration and innovation that they have exhibited during this stage in the gated process.

2. Solution Summary

2.1 Solution summary

The Thames to Affinity Transfer (T2AT) solution involves a transfer of water from proposed sources available in Thames Water's London Water Resource Zone to Affinity Water's Central Region. Two options for the transfer were selected in the Water Resource South East (WRSE) emerging regional plan in January 2022. These two options have been appraised by Thames Water and Affinity Water in the T2AT gate two submission.

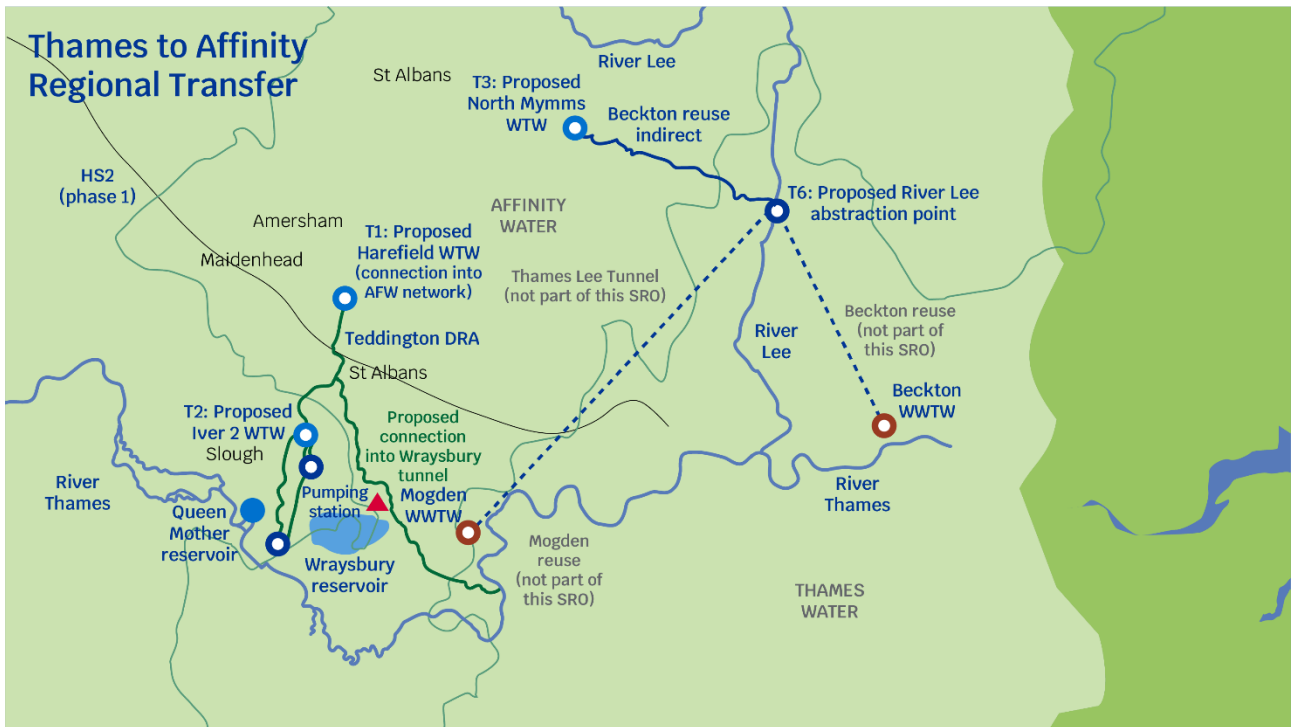
The two options considered in the gate two submission are:

- The Lower Thames Reservoir (LTR) option – A transfer from Thames Water's Lower Thames Reservoir system to Affinity Water, supported by new water resource from the South East Strategic Reservoir Option (SESRO).
- The Beckton Reuse Indirect (BRI) option – A transfer from a new abstraction on the River Lee flood relief channel to Affinity Water, dependent on recycled water being fed into the river from either the Beckton effluent reuse option or Teddington Direct River Abstraction (DRA) option of the London Effluent Reuse solution.

Both options for the transfer could deliver between 50 and 100 Ml/d in a dry year during a 1 in 500 year drought. The LTR option is selected in the WRSE draft Regional Plan and in the draft Water Resource Management Plan (WRMP) 2024 for both partner companies, linked to the development of the South East Strategic Resource Option solution, for use by 2040. The larger capacity option is preferred, transferring up to 100 Ml/d annual average deployable output to Affinity Water. The transfer will be phased, with 50 Ml/d available by 2040 and a further 50 Ml/d available by 2044/2045.

The LTR option (100 Ml/d) is selected for implementation in 2040 by the WRSE draft Regional Plan and by the draft WRMP24. Thames Water and Affinity Water therefore recommend that this option proceeds to gate three. The BRI option is not selected in the reported future pathway of the draft plans; the BRI option is therefore considered only as a future back-up scheme should an issue arise with the LTR option. Thames Water and Affinity Water propose that the BRI option is indefinitely deferred, and that no further work is undertaken on this option after gate two.

Figure 1. Thames to Affinity Transfer Solution Schematic



3. Solution assessment summary

Table 1. Draft decision summary

Recommendation item	Thames to Affinity Transfer
Solution owners	Thames Water and Affinity Water
Should further funding be allowed for the solution to progress to gate three?	Yes
Is there evidence all expenditure is efficient and should be allowed?	Yes
Delivery incentive penalty?	No
Is there any change to partner arrangements?	No
Are there priority actions for urgent completion?	No
Are all priority actions and actions from previous gates addressed?	Either complete, partially complete or incomplete as set out in Section 4.2
Suitable timing for gate three has been proposed	Yes, December 2029 is suitable for gate three.

3.1 Solution progression to standard gate three

The evidence suggests that the solution is a potentially valuable way of supplying water to customers. Based on our assessment of a wide range of areas that could concern the progression of the solution, we have concluded that the solution, LTR option, should progress through the gated process to gate three and agree with Thames Water and Affinity Water's recommendation that the BRI option is indefinitely deferred, and that no further work is undertaken on this option after gate two.

Figure 2 below summarises the area of any progression concerns, including indication of the significance. The reasons for this assessment conclusion are set out in table 2 below.

Decisions on funding as a result of this progression decision, are set out in section 3.2.

Figure 2. Assessment of solution's progression concerns

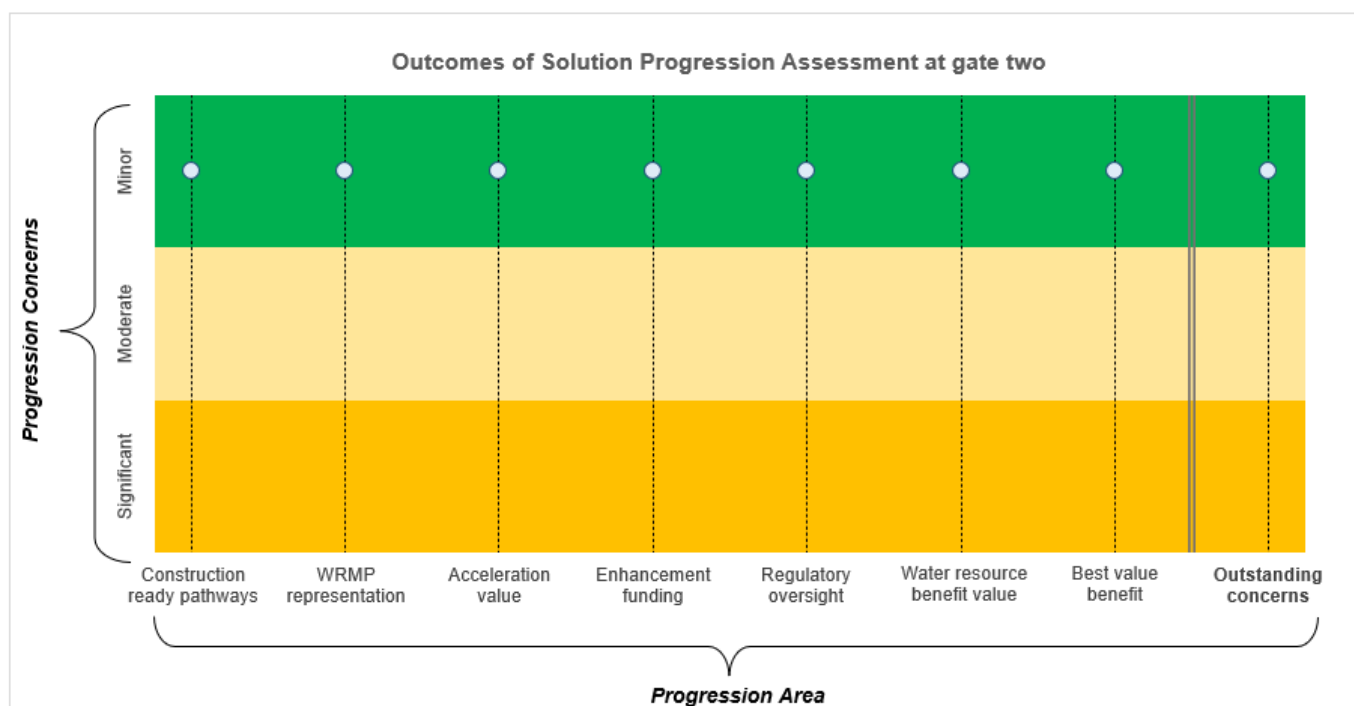


Table 2. Draft decision progression criteria

Progression criteria	Thames to Affinity Transfer
Solution owners	Thames Water and Affinity Water
Is the solution in a preferred or alternative pathway in relevant regional plan or WRMP (where applicable) to be construction ready by 2030?	Yes. The solution is chosen in Thames Water's and Affinity Water's draft WRMP24s, as a solution on their preferred pathways, which is the relevant plan for the standard track. The solution is also in the WRSE draft regional plan. The solution will be construction ready by 2034. No further action is required on this progression criteria.
Do regulators have any significant concerns with the solution's inclusion or non-inclusion in a WRMP or regional plan or with any aspects that may impact its selection, to a level that they have (or intend to) represent on it when consulted?	No, the regulators do not have concerns on how the solution is represented, or the information about it in Thames Water's or Affinity Water's draft WRMP24, or the WRSE draft regional plan. No further action is required on this progression criteria.
Is there value in accelerating the solution's development to meet a company's or region's forecast supply deficit?	Yes. A solution is required to address Thames Water's and Affinity Water's forecast deficits. No further action is required on this progression criteria.
	Yes. Continued funding is required to develop a solution to be delivered in time for the planned construction ready date.

Does the solution need continued enhancement funding for investigations and development to progress?	No further action is required on this progression criteria.
Does the solution need the continued regulatory support and oversight provided by the Ofwat gated process and RAPID?	Yes. The solution will continue to benefit from the regulatory support and oversight provided by being included in the RAPID programme.
	No further action is required on this progression criteria.
Does the solution provide a similar or better cost / water resource benefit ratio compared to other solutions?	Yes. This solution does provide a similar or better cost / water resource benefit ratio compared to other solutions.
	No further action is required on this progression criteria.
Does the solution have the potential to provide similar or better value (environmental, social and economic value – aligned with the Water Resources Planning Guideline) compared to other solutions?	Yes. This solution has the potential to provide similar or better value (environmental, social and economic value – aligned with the Water Resources Planning Guideline) compared to other solutions.
	No further action is required on this progression criteria.
Does a regulator or regulators have outstanding concerns that have not been addressed through the strategic planning processes, taking into account proposed mitigation?	No outstanding concerns have been identified at this stage; however, they may emerge during gate three pending further environmental and other assessments and evidence.
	No further action is required on this progression criteria.

3.2 Solution funding to standard gate three

We are changing the funding of this solution. The details of this funding decision are set out in Table 3 below, and details on the forward programme in section 7.1.

Table 3. Thames to Affinity Transfer funding allowances

	Gate one	Gate two	Gate three	Gate four	Total
Thames to Affinity Transfer gated allowance	£1.09m	£1.64m	£6.52m	£4.37m	£13.62m
Comment	10% of development allowance calculated as 6% of total solution costs	15% of development allowance calculated as 6% of total solution costs	65% of the forecast overspend has been added on top of the previous allowance determined at PR19	40% of development allowance calculated as 6% of total solution costs	Total development allowance calculated as 6% of total solution costs
Previous Allowance	£1.09m	£1.64m	£3.82m	£4.37m	£10.92m
Change from Previous Allowance	£0.00m	£0.00m	£2.70m	£0.00m	£2.70m

This funding has been revised to account for forecast costs at gate three. We have determined that across all solutions gate three costs have risen due to factors such as increases in solution design costs, changes in scope and additional funding required to develop the environmental impact assessment (EIA), water quality assessments, ground investigations and other environmental field studies and assessments. We determine that providing the original gate three allowance combined with 65% of their projected overspend at gate three is appropriate. We do not feel that it would be appropriate to provide solutions with their complete projected overspend at gate three as these projections are not fully mature, and we want to ensure that solutions are still incentivised to keep costs as low as possible.

In addition, we are changing the cost sharing rate that is applied to the solution. At gate three, the solution owners will be responsible for 80% of any overspend. Furthermore, solution owners will be able to retain 25% of any total underspend at gate three, while the remaining 75% will be returned to customers. This diverges from the 50% cost sharing that was outlined in the [PR19 final determinations: Strategic regional water resources solution appendix](#).

3.3 Evidence of efficient expenditure

The PR19 final determination specified that any expenditure on activities outside the gate activities for the identified solutions (or solutions that transfer in) will be considered as inefficient and be returned to customers. We will consider whether gate activity is efficient by considering the relevance, timeliness, completeness, and quality of the submission which should be supported by benchmarking and assurance.

T2AT has carried forward £0.24m underspend from Gate 1, increasing the allowance available to them at Gate 2 to £1.87m.

Our assessment of the efficient costs as spent on standard gate two activities results in an allowance for this solution of £1.82m (of £1.82m claimed). T2AT has therefore underspent its combined gates one and two allowance by £0.05m and may take this underspend forward to gate three, increasing the allowance available to them at gate three to £6.57m.

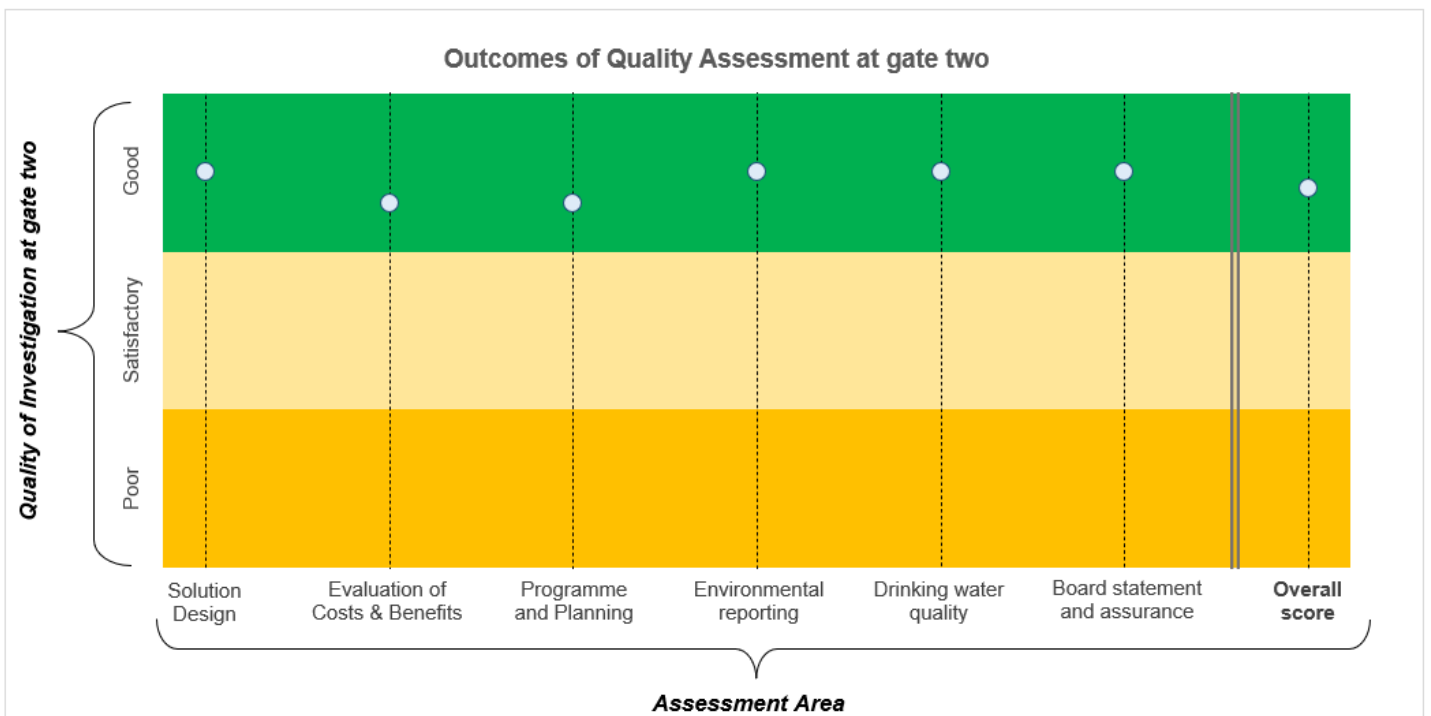
From gate two, we will move to look at the cumulative gate spend against the cumulative total allowance, across all gates consistent with the activities being undertaken. For example, any gate four allowance that is brought forward towards gate three should be for the purpose of early gate four activities. Overspends and underspends are then to be managed through cost sharing between the water company and customers. As T2AT is progressing to gate three, this will apply here.

3.4 Quality of solution development and investigation

The aim of the assessment was to determine whether gate two activities have been progressed to the completion and the quality expected, for the continued development of the solution.

Figure 3 shows our assessment of the work completed on the solution, which was presented in the gate two submission. Our assessment was made against the criteria of robustness, consistency, and uncertainty to grade each area of the submission as good, satisfactory, or poor in accordance with the [standard gate two guidance](#), (updated version published on 12 April 2022). We also assessed the Board assurance provided.

Figure 3. Assessment of quality of investigation



Our overall assessment for the solution submission is that it is a good submission that meets the expectations of gate two.

We explain our assessment of each area, including any shortfalls in expectations, in the sections below. We have not applied any delivery incentive penalties as a result of this assessment of quality, as further detailed in section 4.

3.4.1 Solution Design

Our assessment of the Solution Design considered the quality of the evidence provided on the initial solution and sub-options; the anticipated operational utilisation of solutions; the

interaction of the solution with other proposed water resource solutions and stakeholder and customer engagement. The assessment also considered whether information was provided on the context of the solutions place within company, regional and national plans.

We consider the progress and quality of the submission in developing the solution design at gate two to be satisfactory. Options have been refined to one preferred option, LTR. Scheme utilisation and interactions are described, and the preferred option is chosen in both the WRSE Plan and WRMPs. Further improvements are required in the gate three submission relating to presentation and description of the LTR option, evidence that the scheme is placed in the context of company plans and on customer and stakeholder engagement. The actions and recommendations set for this solution are expected to address the gaps identified at gate two.

3.4.2 Solution costs

Our assessment of the unit costs of delivering the T2AT solution is that they are reasonable at this stage and cost changes from gate one to gate two have been sufficiently explained and are as a result of detailed development of the solution or changing market conditions. For instance, capex estimates have increased due to the movement of the WTWs from a greenfield to brownfield site. The assessment also considers the use of the solution as a drought resilience asset, and therefore cost per capacity is often a more appropriate metric than cost per projected utilisation.

3.4.3 Evaluation of Costs and Benefits

Our assessment of the Evaluation of Costs and Benefits considered the quality of the information provided on initial solution costs; the social, environmental and economic cost and benefits, water resource benefits and wider resilience benefits. The assessment also considered whether evidence was provided on how the solution delivers a best value outcome for customers and the environment.

We consider that Thames Water and Affinity Water have provided sufficient evidence of evaluating the costs and benefits of the solution to an appropriate standard for gate two.

The best value assessment, particularly the natural capital and biodiversity net gain assessments, fell short of expectations for gate two. These assessments will need to be revisited and repeated for gate three to ensure the scheme development is on track for this area. Following the query process, water resources benefits, resilience benefits and best value all meet requirements for gate two. Recommendations and actions have been set for the solution to ensure that evidence is provided to show that the solution represents the best value option and for conjunctive use benefits to be refined.

3.4.4 Programme and Planning

Our assessment of the Programme and Planning considered whether Thames Water and Affinity Water presented a programme with key milestones and whether its delivery is on track. The assessment also considered the quality of the information provided on risks and issues to solution progression, the procurement and planning route strategy and subsequent gate activities with outcomes, penalty assessment criteria and incentives.

We consider the evidence provided by Affinity Water and Thames Water regarding the programme and planning and risks and issues for T2AT to be of sufficient detail and quality for gate two. Risks and mitigation are characterised well and meet expectations for gate two. While the programme and planning score has been marked down as requirements that solution owners were funded to meet have not been met, we have made a decision that there is no longer a need for value for money assessments for RAPID solutions and therefore no associated gate two action is required.

3.4.5 Environment

Our assessment of Environment considered the initial option-level environmental assessment; the identification of environmental risks and an outline of potential mitigation measures; the detailed programme of work used to address environmental assessment requirements and the initial outline of how the solution will take into account the carbon commitments.

We consider Thames Water and Affinity Water to have provided sufficient evidence of progress in the environmental assessment, potential mitigations, future work programmes and embodied and operational carbon commitments for gate two. All required environmental assessments have been undertaken to the required standard, with risks identified and mitigation provided. Further work to be carried out in a gate three checkpoint has been described in the gate two submission. The carbon assessment meets expectations.

3.4.6 Drinking water quality

Our assessment of Drinking Water Quality considered drinking water quality and risk assessments; evidence that the solution has been presented to the drinking water quality team and a plan for future work to develop Drinking Water Safety Plans.

We consider Thames Water and Affinity Water to have provided sufficient evidence of progress in the drinking water quality and risk assessment, and future work around Drinking Water Safety Plans for gate two.

Some further work is recommended in this area ahead of gate three. Additional monitoring, including for emerging contaminants, is required to inform the company Drinking Water Safety Plan (DWSP), Water Quality Risk Assessment (WQRA) and treatment requirements at the receiving water treatment works. The impact of any source change on customers also needs to be considered as part of future customer and stakeholder engagement.

3.4.7 Board Statement and assurance

The evidence provided relating to assurance is good for this stage of the gated process.

We consider that the Boards of Affinity Water and Thames Water have provided a comprehensive assurance statement and have clearly explained the evidence, information, and external/internal assurance that they have relied on in giving the statement.

4. Actions and recommendations

Where the submission has not been assessed as 'meeting expectations' in the quality assessment, or progression concerns have been raised, we have provided feedback on where we will seek remediation of the issues. We have also identified specific steps that solution owners should take in preparing for standard gate three.

We have categorised these remediation issues and steps into priority actions, actions, and recommendations.

Priority actions are those that should have been completed at gate two and must now be addressed on a short timescale in order to make sure the solutions stay on track. They require urgent remediation in full.

Actions are those that should be addressed in full in the standard gate three submission. The response to these actions will influence the assessment of the gate three submission.

Recommendations are issues where additional information or clarification could improve the quality of future submissions.

We have also assessed progress on actions and recommendations from gate one.

4.1 Actions and recommendations from gate two assessment

No priority actions have been identified for T2AT.

14 actions and recommendations have been identified for T2AT, which should be fully addressed at the gate three submission. Progress against actions will be tracked as part of regular checkpoints the solution holds with us whilst undertaking gate three activities.

The full list of actions and recommendation for T2AT can be found in Appendix A. If solution owners cannot meet action deadlines set, please explain this in the representation.

4.2 Actions and recommendations from gate one assessment

We have assessed whether T2AT has met actions that were set out as a result of our gate one assessment.

No priority actions were identified for T2AT.

12 actions and recommendations were identified for T2AT, which were expected to be fully addressed at the gate three submission.

We have decided that the actions have partially been addressed in the gate two submission. Further detail of our conclusion against each individual action is shown in Appendix B.

Partially complete and incomplete actions have been linked to gate two recommendations to ensure that these are fully resolved by gate three.

Further detail of our conclusion against each individual action is shown in Appendix B.

5. Delivery Incentive Penalty

We have not applied delivery incentive penalties to this solution, as a result of the assessment carried out on the gate two submission.

6. Proposed changes to partner arrangements

There are no changes proposed to partner arrangements from gate two.

7. Gate three activities and timing

The solution will continue to be funded to gate three as part of the standard gate track.

For its gate three submission, we expect Thames Water and Affinity Water to complete the activities listed in the [PR19 final determinations: strategic regional water resources solutions appendix](#), as expanded on in section 7 of the T2AT gate two submission. Activities are expected to be completed in line with delivery incentives and expectations set out in [RAPID's gate three guidance](#). We also expect the actions listed in appendix A to be addressed.

7.1 Gate three timing

Thames Water and Affinity Water have proposed a date for gate three of December 2029, with two checkpoints ahead of gate three in June 2024 and early 2028. This is proposed alongside a forward programme of gate four in 2031, proposed planning application submitted in 2031, and solution construction ready in 2034. Half of the transfer (50 Ml/d) will be operational in 2040, with the remaining transfer (50 Ml/d) being operational by 2044/2045.

We agree that the T2AT gate three should be in December 2029. This aligns gate three with solutions on a similar programme, and enables RAPID to efficiently assess progress of activities, ahead of the solutions proposed planning application.

Thames Water and Affinity Water propose two mid-gate checkpoints between gates two and three for the preferred LTR option, one in June 2024 with the intention of deferring the option until 2028, and a second one in 2028 to restart the option. We understand that the reasoning for this is to enable efficient delivery of the subsequent Development Consent Order (DCO) and scheme delivery, when required. RAPID has decided that solution owners should bring this discussion to a regular checkpoint meeting at an opportune time and formalise any requests relating to scheme progression with associated reasoning through a letter to RAPID.

We agree with the forward programme for gate four.

The forward programme proposed by the solution is in line with the principles of RAPID's standard programme. Funding arrangements are set out in section 3.2 of this document.

8. Next steps

Following publication of this standard gate two draft decision solution owners and other interested parties are invited to respond to the draft decision. Representations, including evidence from solution owners that priority actions (identified in the Appendix) have been addressed, can be made by email to rapid@ofwat.gov.uk and will close at 6pm on 11 May 2023.

All representations will be considered before our final decision is published at 10am on 28 June 2023.

Appendix A: Gate two actions and recommendations

Actions – to be addressed in standard gate three submission		
Number	Area	Detail
1	Solution Design	Confirm to RAPID that the solution aligns with Affinity Water's and Thames Water's WRMPs and relevant Regional Plans at the next available regular checkpoint meeting after the publication of the WRMPs and Regional Plans.
2	Evaluation of Costs and Benefits	Revisit the Natural Capital Assessment and Biodiversity Net Gain Assessment using the feedback from the Environment Agency to shape scope.
Recommendations		
Number	Area	Detail
1	Solution Design	Refine the schematic of the potential pipe location. Further clarify the work required by Affinity Water in Harefield to disseminate the extra resource from the solution.
2	Solution Design	Clarify the work required downstream from Harefield by Affinity Water. This should form part of the project as it is critical for the success of the solution. Explain how the solution fits in to company plans.
3	Solution Design	Engage with customers ahead of gate three to explain source water changes and show how the outcomes of this engagement have influenced scheme development.
4	Solution Design	Clarify and state where solution responsibilities lie between Thames Water and Affinity Water.
5	Solution Design	Carry out community engagement.
6	Evaluation of Costs and Benefits	Show directly how the benefits of the solution align with Ofwat's Public Value Principles.
7	Evaluation of Costs and Benefits	Include Chalk Streams First in the WRMP process, because this has not been assessed as part of the gate two process.
8	Evaluation of Costs and Benefits	Account for conjunctive use benefit with the SESRO and the Severn to Thames Transfer (STT) plus any other in-combination deployable output impact with other solutions in WRSE modelling.
9	Evaluation of Costs and Benefits	Work with local area Environment Agency teams to refine conjunctive use benefits as outlined in WRMPs.

10	Environment	Check all designated site features and potential impact pathways have been identified, undertake in-combination assessments, and reroute any options to avoid SSSIs where this has not already been done.
11	Drinking Water Quality	Continue to develop work to determine the impact of algae (required in Water Quality Risk Assessment) and the impact on the upstream water treatment works.
12	Drinking Water Quality	Engage with all stakeholders, including regulatory bodies, to fulfil the All Company Working Group requirements for emerging hazards.

Appendix B: Gate one actions and recommendations

Actions – addressed in standard gate two submission			
Number	Area	Detail	RAPID assessment outcome
1	Costs and Benefits	Include resilience metric scores associated with the solution and options and clarify how resilience risks and benefits are captured within the regional best value plan.	Complete
2	Costs and Benefits	Ensure climate change impacts are included in the water resource benefits.	Complete
3	Costs and Benefits	Assess conjunctive use benefits.	Partially complete – Link to recommendation 7.
4	Costs and Benefits	Further consider operational issues as the solution could be considered low utilisation.	Complete
5	Environment	Ensure and provide evidence that PAS 2080 and a science-based approach have been used to guide the carbon assessment.	Complete
6	Solution Design	Complete a detailed assessment of interdependencies and in-combination impacts with other strategic resource solutions and other solutions following the output of regional modelling.	Partially complete – Link to recommendation 7.
Recommendations			
Number	Area	Detail	RAPID assessment outcome
1	Solution Design	Ensure lead times are consistently included across all options.	Complete
2	Solution Design	Clarify and state where solution responsibilities lie between Thames Water and Affinity Water.	Incomplete – Recommendation carried forward link to recommendation 4
3	Solution Design	Use regional modelling outputs to inform utilisation.	Complete
4	Environment	Reference key methodologies and associated relevant frameworks used to calculate operational and embodied carbon and to guide the carbon assessment.	Complete

5	Environment	Check all designated site features and potential impact pathways have been identified, undertake in-combination assessments, and reroute any options to avoid SSSIs where this has not already been done.	Partially complete – Recommendation carried forward link to recommendation 10
6	Environment	Thoroughly consider the CSF proposal for flow recovery at gate two and engage with RAPID and interested stakeholders on how this might best be accomplished.	Complete

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Ofwat
Centre City Tower
7 Hill Street
Birmingham B5 4UA
Phone: 0121 644 7500

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