

March 2023

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

## Contents

1. Introduction .....	3
2. Solution Summary .....	5
2.1 Solution summary .....	5
3. Solution assessment summary .....	6
3.1 Solution progression to standard gate three .....	6
3.2 Solution funding to standard gate three .....	8
3.3 Evidence of efficient expenditure .....	9
3.4 Quality of solution development and investigation .....	9
3.4.1 Solution Design .....	10
3.4.2 Solution costs .....	11
3.4.3 Evaluation of Costs and Benefits .....	11
3.4.4 Programme and Planning .....	11
3.4.5 Environment.....	12
3.4.6 Drinking water quality .....	12
3.4.7 Board Statement and assurance.....	12
4. Actions and recommendations .....	13
4.1 Actions and recommendations from gate two assessment.....	13
4.2 Actions and recommendations from gate one assessment.....	13
5. Delivery Incentive Penalty.....	15
6. Proposed changes to partner arrangements .....	16
7. Gate three activities and timing.....	17

7.1	Gate three timing.....	17
8.	Next steps .....	18
	Appendix A: Gate two actions and recommendations .....	19
	Appendix B: Gate one actions and recommendations.....	21

# 1. Introduction

The purpose of this publication is to set out our final decision about whether the Thames Water to Southern Water Transfer (T2ST)<sup>1</sup> solution should continue to receive development funding<sup>2</sup>. The solution owners Thames Water and Southern 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 Southern Water T2ST can be found in the T2ST publication document on the [Thames Water](#) website<sup>3</sup>.

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](mailto: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](http://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.

---

<sup>1</sup> Referred to in PR19 final determination as “Thames to Southern transfer”

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

<sup>3</sup> [Strategic water resource solutions | Regulation | About us | Thames Water](#)

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 Southern 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 Water to Southern Water Transfer (T2ST) will convey potable water from Thames Water's Swindon and Oxfordshire water resource zone to Southern Water's Hampshire area, with an earliest commissioning date of 2040. As there is not currently a surplus of supply within the Thames Water Resource Zones, the solution is dependent on the prior development and commissioning of an additional water resource option – the River Severn to River Thames Transfer (STT) and/or the South East Strategic Reservoir Option (SESRO).

Capacities of 50 MI/d, 80 MI/d, and 120 MI/d have been assessed for the preferred options. There are two preferred options at this stage:

- Option B: Transfer from land west of the A34 near Drayton to Hampshire. Route west of Newbury, remaining west of the A34, to Winchester (with spurs to Kingsclere WRZ (5MI/d) and Andover WRZ (45MI/d)).
- Option C: Transfer from land west of the A34 near Drayton to Hampshire. Route west of Newbury, crossing east of the A34, to Winchester (with spurs to Kingsclere WRZ (5MI/d) and Andover WRZ (45MI/d)).

For the 50MI/d capacity, all water is supplied to Kingsclere and Andover water resource zones and there is no direct T2ST connection to Winchester.

**Figure 1. Thames Water to Southern Water Transfer Solution Schematic**



### 3. Solution assessment summary

Table 1. Draft decision summary

Recommendation item	Thames Water to Southern Water Transfer
Solution owners	Thames Water and Southern 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?	Yes, set out in section 6.
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, November 2027 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 should progress through the gated process to gate three. 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.

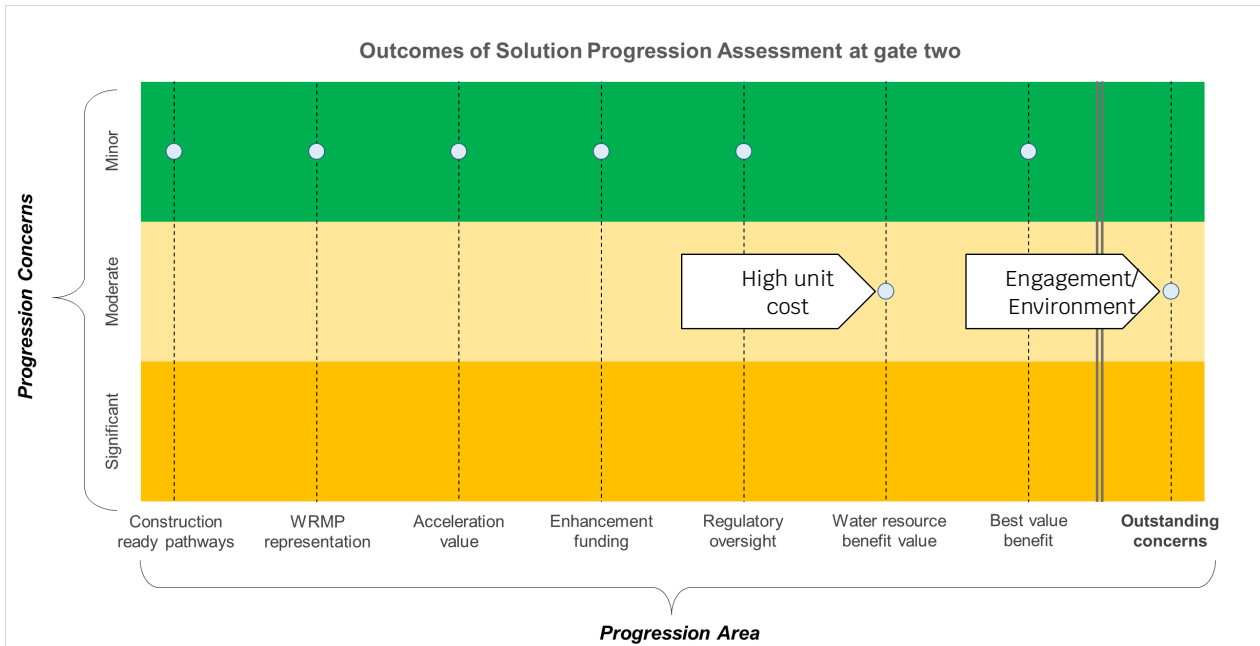


Figure 2. Assessment of solution's progression concerns

Table 2. Draft decision progression criteria

Progression criteria	Thames Water to Southern Water Transfer
Solution owners	Thames Water and Southern 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 Southern Water's draft Water Resource Management Plans (WRMPs) 2024, as a solution on their preferred pathways, which are the relevant plans for the standard track. The solution is also in the Water Resource South East (WRSE) draft regional plan. The solution will not be construction ready by 2030. It is not selected in the regional plan until 2040, so the solution will be construction ready by 2032.
	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 and Southern 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 Southern Water's forecast deficit.
	No further action is required on this progression criteria.
Does the solution need continued enhancement funding for investigations and development to progress?	Yes. Continued funding is required to develop a solution to be delivered in time for the planned construction ready date.
	No further action is required on this progression criteria.



<b>Does the solution need the continued regulatory support and oversight provided by the Ofwat gated process and RAPID?</b>	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.
<b>Does the solution provide a similar or better cost / water resource benefit ratio compared to other solutions?</b>	No. This solution does not provide a similar or better cost / water resource benefit ratio compared to other solutions.
	See section 3.4.2.
<b>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?</b>	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.
<b>Does a regulator or regulators have outstanding concerns that have not been addressed through the strategic planning processes taking into account proposed mitigation?</b>	Yes. Outstanding concerns remain around the need to undertake comprehensive stakeholder/customer engagement and address environmental risks by gate three.
	This progression concern is addressed in actions 1 and 6 in Appendix A of this document.

## 3.2 Solution funding to standard gate three

We are not changing the funding of this solution. This solution's total allowance and gate allowances remain the same as the final determination. The details of this funding decision are set out in Table 3 below, and details on forward programme in section 7.1.

**Table 3. Thames Water to Southern Water Transfer funding allowances**

	Gate one	Gate two	Gate three	Gate four	Total
<b>Thames Water to Southern Water Transfer gated allowance</b>	£1.50m	£2.25m	£5.25m	£6.00m	£15.00m
<b>Comment</b>	10% of development allowance calculated as 6% of total solution costs	15% of development allowance calculated as 6% of total solution costs	35% of development allowance calculated as 6% of total solution costs	40% of development allowance calculated as 6% of total solution costs	Total development allowance calculated as 6% of total solution costs

We recognise that the solution is likely to overspend its allowance at gate three due to increases in costs that are outside of its direct control. However, we have not received sufficient evidence to justify Thames Water to Southern Water Transfer's gate three forecast

costs and welcome a detailed revised forecast to be submitted during the representation period.

This funding is allowed in accordance with the conditions and requirements as 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.

Thames Water to Southern Water Transfer has carried forward £0.87m underspend from gate one, increasing the allowance available to them at gate two to £3.12m.

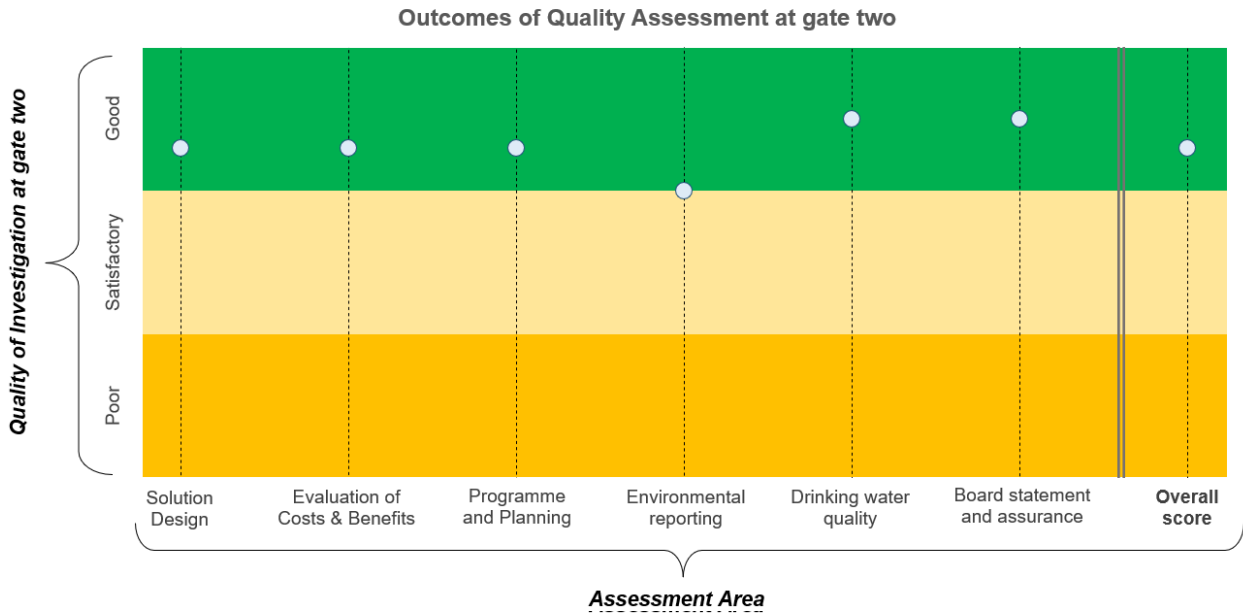
Our assessment of the efficient costs as spent on standard gate two activities results in an allowance for this solution of £2.17m (of £2.17m claimed). The Thames Water to Southern Water Transfer has therefore underspent its combined gates one and two allowance by £0.95m and may take this underspend forward to gate three, increasing the allowance available to them at gate three to £6.20m.

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 the Thames Water to Southern Water Transfer 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.

In addition to the overall assessment score, there is some variance in expectations being met across the submission, with solution design and environmental reporting falling short of expectations and not being as developed as would be expected at gate two.

We explain our assessment of each individual 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 Southern Water and Thames Water to have provided partially sufficient evidence of progress in developing the solution design for gate two. They have fallen short in providing enough evidence in the areas of utilisation and stakeholder and customer engagement, for which actions and recommendations are included.

### **3.4.2 Solution costs**

Our assessment of the unit costs of delivering the Thames to Southern Transfer is that they are relatively expensive at this stage with respect to other comparable solutions. 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, storage volumes and sweetening flows have reduced from gate one. 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. We will continue to scrutinise cost estimate changes from gate two to gate three.

### **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 Southern Water and Thames Water have provided partially sufficient evidence of evaluating the costs and benefits of the solution to an appropriate standard for gate two. They have fallen short in providing enough evidence in the best value assessments, particularly the natural capital and biodiversity net gain assessments, for which actions and recommendations are included.

### **3.4.4 Programme and Planning**

Our assessment of the Programme and Planning considered whether Thames Water and Southern 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 Southern Water and Thames Water regarding the programme and planning, risks and issues and the procurement and planning route strategy for the Thames Water to Southern Water Transfer to be of sufficient detail and quality 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 Southern Water and Thames Water to have provided sufficient evidence of progress in the environmental assessment, potential mitigations and future work programmes for gate two. However, the carbon assessment fell short of expectations in many areas and should be revisited when the solution is more developed.

### **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 Southern Water and Thames 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.

### **3.4.7 Board Statement and assurance**

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

We consider that the Boards of Southern 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 the Thames Water to Southern Water Transfer.

Eleven actions and recommendations have been identified for T2ST, which should be fully addressed at the gate three submission or at an alternative or earlier date where this has been set in Appendix A. 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 priority actions, actions and recommendation for the Thames Water to Southern Water Transfer 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 T2ST has met actions that were set out as a result of our gate one assessment.

No priority actions were identified for the Thames Water to Southern Water Transfer.

Eight actions and recommendations were identified for the Thames Water to Southern Water Transfer, which were expected to be fully addressed at the gate two 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 actions and 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 the following changes proposed to partner arrangements from gate two.

Thames Water and Southern Water propose that accountability for the Thames Water to Southern Water Transfer lies solely with Southern Water going forwards, with continued consultation with Thames Water. The current 50:50 split in development costs is proposed to continue until the end of AMP7, at which point Southern Water would pay for 100% of the development.

We understand the reasoning behind the proposal to change accountability and funding arrangements, however, we have determined that a 90:10 split in development costs and accountability between Southern Water and Thames Water is appropriate. This is to align with the partner arrangements for similar solutions such as the River Severn to River Thames Transfer. The change in partner arrangements must be from gate two onwards or can be delayed it to gate three. It cannot change at AMP cycles.

We expect the solution owners to review partner arrangements, including the funding allocation, during the representation period.

## 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 Southern Water to complete the activities listed in [PR19 final determinations: strategic regional water resources solutions appendix](#), as expanded on in Section 7 of the solution's 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 Southern Water have proposed a date for gate three of November 2027, with proposed checkpoints in March 2024 and September 2025. This is proposed alongside a forward programme of gate four in January 2029, proposed planning application submitted in 2029, solution construction ready in 2032, and solution operational in 2040.

We agree that the T2ST gate three should be November 2027. 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.

Regarding Thames Water and Southern Water's proposal for a mid-gate checkpoint, between gates two and three, in March 2024. 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](mailto: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 (except where an earlier date is given below)		
Number	Area	Detail
1	Solution Design	Develop a full T2ST-specific stakeholder engagement strategy
2	Solution Design	Confirm to RAPID that the solution aligns with Thames Water’s and Southern Water’s WRMPs and relevant Regional Plans at the next available regular checkpoint meeting after the publication of the WRMPs and Regional Plans
3	Solution Design	Fully identify and assess the impacts of pipeline routes and construction on the environment, particularly on designated sites and river crossings.
4	Costs & Benefits	Revisit the natural capital and biodiversity net gain assessments using feedback from consultants to shape the scope and implement a mitigation strategy to meet the biodiversity net gain threshold.
5	Costs & Benefits	Identify the least cost and best value options at a solution level.
6	Environment	Work with the Environment Agency to de-risk areas of environmental concern, including pipeline crossings of designated sites, rivers and flood plains, and groundwater interactions.
7	Environment	<p>Refine the carbon assessment once a preferred option is selected and more information is available on construction methods and pipeline materials. This includes addressing areas of improvement from the gate two submission, such as:</p> <ul style="list-style-type: none"> <li>- Can T2ST embrace innovative designs &amp; renewable energy (RE) opportunities or opportunities to sequester carbon?</li> <li>- Further work on selection of materials and whether the lowest carbon options have been considered</li> <li>- Look to help shape the availability of low carbon materials in the supply chains</li> <li>- Provide details of monitoring and reporting of project emissions during and post project completion planned</li> <li>- Provide clear evidence of consideration of how whole life carbon has been reduced within the design</li> </ul>

<b>Recommendations</b>		
<b>Number</b>	<b>Area</b>	<b>Detail</b>
1	Solution Design	Southern Water to complete further detailed water resource modelling using a Pywr water resource model of the Hampshire supply area. This work should further inform the required utilisation including monthly operation.
2	Solution Design	Provide information on the interaction with other solutions, specifically SESRO, STT as potential sources, and ongoing Southern solutions.
3	Solution Design	Consider completing solution-specific customer engagement on the level of support for T2ST.
4	Costs & Benefits	Use the capacity in the regional plan and WRMP to account for conjunctive use benefit with SESRO, STT and Southern solutions, plus any other in-combination deployable output impact with other solutions, in WRSE modelling.

## Appendix B: Gate one actions and recommendations

Actions – addressed in standard gate two submission			
Number	Area	Detail	RAPID assessment outcome
1	Solution Design	Complete regional modelling to determine the preferred SRO capacity.	Complete
2	Solution Design	Fully identify and assess the impacts of pipeline routes and construction on the environment, particularly on designated sites and river crossings.	Incomplete – Action carried forward links to gate two action 3
3	Solution Design	Consider requirements for maintenance flows from the River Thames.	Complete
4	Solution Design	Update Table 3 (Inter-related schemes affecting need and timing of T2ST) to reflect the current understanding of the Havant Thicket delivery timing, and the requirement and timing of other strategic resolution solutions and other solutions when they are on differing timescales. Include the new Havant Thicket+ strategic resource solution in this table and update it at gate two to reflect the decision at Southern Water's accelerated gate two.	Partially complete – Link to gate two recommendations 1, 3 and 5.
5	Solution Design	Ensure regional modelling considers the full range of spur connections and transfers to Portsmouth and Wessex Water. Potential supplies to Thames Water's Kennet Water Resource Zone and to South East Water should also be included in the scope of work.	Complete
6	Solution Design	Provide a detailed assessment of interdependencies and in-combination impacts with other strategic resource solutions and other solutions required for gate two following the outputs of regional modelling.	Partially complete – Link to gate two recommendation 5.
7	Evaluation of Costs & Benefits	Undertake regional modelling to quantify the water resource benefits of the solution. As outlined in the response to query TST008, this is expected to be a two-stage process, with an initial phase in late 2021 to model the solution, followed by an update where the updated solution is submitted into a second round of regional modelling in early 2022. The deployable output should be set out in terms of meeting the deficit.	Complete

8	Evaluation of Costs & Benefits	Further investigate how the solution could improve regional resilience to other water companies such as Portsmouth, Bournemouth, and Wessex Water. Include benefits other than from resilience in water supply and economic benefits, such as environmental, flood, and multi-sector benefits.	Complete
---	--------------------------------	--	----------

**Ofwat (The Water Services Regulation Authority)  
is a non-ministerial government department.  
We regulate the water sector in England and Wales.**

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

© Crown copyright 2023

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3).

Where we have identified any third party copyright information, you will need to obtain permission from the copyright holders concerned.

This document is also available from our website at [www.ofwat.gov.uk](https://www.ofwat.gov.uk).

Any enquiries regarding this publication should be sent to [mailbox@ofwat.gov.uk](mailto:mailbox@ofwat.gov.uk).

**OGL**