



Draft Water Resources Management Plan 2024

Section 1 – Introduction and Background

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Background and Introduction

In this section we cover:

- The purpose of the Water Resources Management Plan (WRMP)
- An overview of our water supply area and the levels of service we plan to provide to our customers
- The statutory, regulatory and policy framework which shapes our WRMP
- The relationship between the WRMP and other plans including the five-year business plan and local authority local plans
- Engagement with regulators, stakeholders and our customers during the development of the draft South East regional plan and our draft WRMP
- Engagement with our Board
- Quality assurance undertaken on our draft WRMP

Developments since WRMP19:

WRMP19 was approved for publication in March 2020, it is still robust and fit for purpose and we monitor and prepare a six-month progress report. WRMP19 was the starting point for developing our draft WRMP24. There have been some changes since WRMP19, here's a summary of the main changes relevant to this section of the draft WRMP24.

- The National Framework for water resources, introduced in 2020, strengthened regional planning. We have worked closely with the other South East water companies, other water using sectors and regulators through Water Resources South East (WRSE), to develop a best value regional plan, which provides greater benefits to society and the environment over the long term than a least cost plan would achieve. Our draft WRMP24 closely reflects the South East regional plan.
- We have improved our levels of service to customers to align with the other South East water companies and have increased our resilience to severe drought, planning to achieve 1 in 200 - year level of drought resilience by the early 2030s and 1 in 500 - year level of drought resilience by 2040.
- We have applied a greater focus on adaptive planning, and best value planning. Our WRMP19 was a best value plan which incorporated adaptive planning techniques. Our draft WRMP24, and the South East Regional Plan, have utilised these techniques more heavily.
- We have shown how we will contribute to government policy expectations including setting a destination for environmental enhancement and commitments to contribute to the net zero carbon target.
- We have committed to ambitious targets to halve leakage from 2017-18 levels by 2050 and to reduce water consumption.
- We have worked collaboratively to examine Strategic Resource Options (SROs),

Introduction to the Water Resources Management Plan

- 1.1 A secure water supply is essential for public health, the environment and the economy. Water companies have a statutory duty to develop and maintain efficient and economical systems of water supply which will provide security of supply for customers¹.
- 1.1 Every five years water companies are required² to produce a Water Resources Management Plan (WRMP). The primary objective of the plan is to ensure that there is sufficient water available to meet anticipated demands, under various weather conditions but in particular in dry and very dry conditions, whilst protecting the environment.
- 1.2 The WRMP is a strategic plan which sets out how the company plans to achieve a secure supply of water for customers and a protected and enhanced environment. It includes:
- Forecasts for the likely demand for water taking account of population growth, climate change, and changes in water use due to new housing standards, improved efficiency of water fixtures and fittings and the impact of smart water meters. (Section 3)
 - Forecasts for the amount of water available for public water supply including the impacts of climate change. (Section 4)
 - Forecasts for environmental ambition including the location and pace for reduced abstraction. (Section 5)
 - The planning challenge looking ahead to 2075. (Section 6)
 - A range of feasible options to reduce demand for water, called demand reduction options, and options to increase the amount of water available, called new water sources, as well as catchment and nature based solutions. (sections 7 and 8)
 - An assessment of the environmental impacts and opportunities. (Section 9)
 - An adaptive approach to planning to accommodate uncertainties in developing a long term plan with a preferred, or reported, programme of investment, including both demand and supply options, to ensure a secure water supply and one that provides best value to society and the environment. (Sections 10 and 11)
- 1.3 We have complied with legal requirements and followed regulatory guidance including the Water Resources Planning Guideline (WRPG)³ in developing the draft WRMP24. The WRPG provides a clear framework for developing the plan.
- 1.4 We have also considered policy expectations⁴ in developing the draft WRMP24. A central policy objective for this round of plans is the need to contribute to a protected and enhanced environment. This has been translated into:
- Setting an environmental destination – this describes how we aim to achieve and maintain sustainable abstraction to 2050 and beyond

¹ Water Industry Act 1991, Section 37

² Water Industry Act 1991, Sections 37A to 37D (as amended by the Water Act 2003)

³ Environment Agency, Ofwat and Natural Resources Wales, Final Water Resources Planning Guideline: Update July 2022

⁴ Defra, Government expectations for water resource planning, May 2022

- Consideration of the environment and society in decision making
- Ensuring compliance with environmental legislation – Strategic Environmental Assessment (SEA), Water Framework Directive (WFD) and Habitats Regulations Assessment (HRA)

- 1.5 This is our draft WRMP24 which covers the period from 2025 to 2075. We have taken a long term view, setting a 50-year planning period, recognising the challenges and risks that we face for future water supply.
- 1.6 The plan builds on our previous plan, WRMP19, published in March 2020 and reflects the draft South East best value regional plan.
- 1.7 We have worked openly with regulators and stakeholders through the development of the draft regional plan and this draft plan, sharing information in a timely way on policy matters and the technical methods, assumptions and decision making. We have also engaged with our customers to ensure we understand and take account of their preferences.
- 1.8 We will monitor progress against the commitments made in this plan and report progress through the regulatory annual review process; furthermore every five years we will review and update our plan.

Our water supply area

- 1.9 Our water supply area extends from Cirencester in the west to Dartford in the east and from Banbury in the north to Guildford in the south and covers over 13,000 square km. Every day, we supply around 2,600 million litres of water to around 10 million people and 220,000 businesses⁵. Our water supplies are derived from a mix of surface water sources (mostly from large storage reservoirs supplied from the River Thames and River Lee) and groundwater sources. We also have a desalination water treatment works on the River Thames (Tideway) that can supplement water supplies at times of high demand and/or during drought conditions.
- 1.10 For planning purposes our supply area is divided into six water resource zones (WRZs) as presented in Figure 1-1. A WRZ describes an area within which the abstraction and distribution of water to meet demand is largely self-contained and all customers experience the same risk of supply failure and the same level of service. We have defined our WRZs using the Environment Agency's WRZ assessment methods⁶. We undertake the WRMP planning process for each WRZ to ensure we can provide a secure supply of water to our customers in that zone.
- 1.11 London WRZ is the largest of the six zones and covers much of the Greater London area. The water resources for London are largely based on abstraction from the River Thames (80%), which is stored in reservoirs, and the remainder from underground sources (aquifers) via boreholes.
- 1.12 The next largest zone is the Swindon and Oxfordshire (SWOX) WRZ. This zone is supplied mainly from groundwater (60%), supported by river abstraction and a reservoir, sited near Oxford.
- 1.13 The other zones to the west of London are Kennet Valley (this includes Reading and Newbury); Henley; Slough, Wycombe and Aylesbury (SWA) and Guildford. These latter four zones are largely reliant on groundwater abstraction although there are abstractions directly from local rivers, notably the River Kennet in Reading and the River Wey near Guildford.
- 1.14 A more detailed map of each WRZ along with a high level description of each zone can be found in Appendix D: Water resource zone integrity.
- 1.15 As a part of the development of our draft WRMP24 we reviewed the WRZs with the Environment Agency and agreed that they were still the most appropriate planning units⁷.

⁵ Data taken from AR21. In April 2017 a competitive retail market for water services for business customers was introduced. This means that business customers can choose which retailer they buy their water and wastewater services from. The retailer provides billing, customer service and efficiency advice to the business customer, while Thames Water, as a wholesale water provider, still has an obligation to supply the water and sewerage services and manage the infrastructure.

⁶ Environment Agency, Water resources planning guideline supplementary guidance – Water resource zone integrity, March 2021

⁷ Thames Water and Environment Agency WRMP24 pre-consultation meeting, April 2022

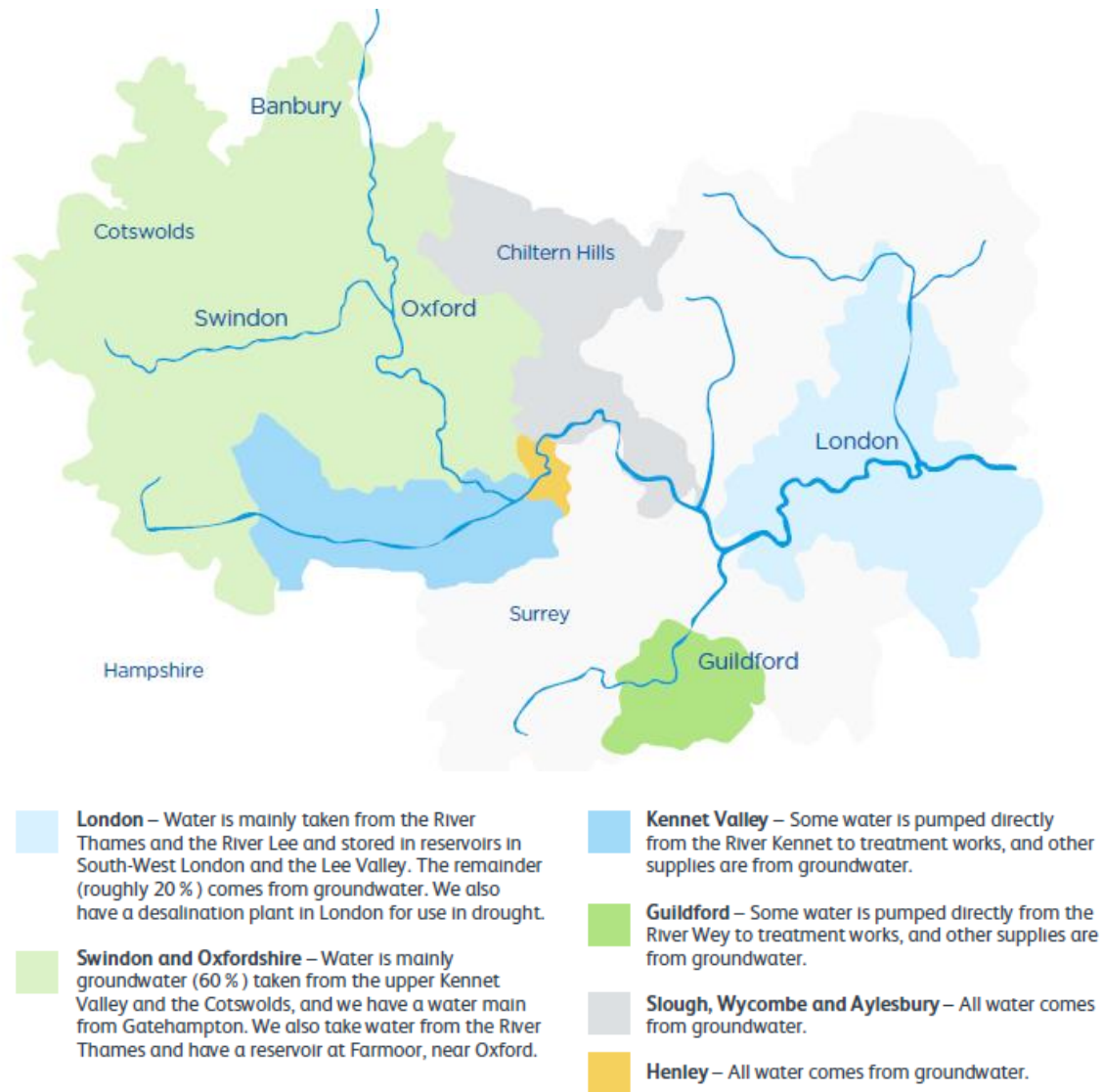


Figure 1 - 1 Thames Water supply area and Water Resource Zones

Levels of service provided to our customers

- 1.16 The WRMP is our long-term plan to make sure we can provide a secure and sustainable supply of water to our customers during periods of dry weather. However, we can't plan for all eventualities and during extended periods of low rainfall our water supplies can become depleted, and we may need to take action to reduce demand for water such as Temporary Use Bans (TUBs) and Non-Essential Use Bans (NEUBs), as well as measures to increase the amount of water that is available. Such measures are known as drought interventions and these either have a direct effect on customers (e.g. TUBs) or the environment (e.g. drought permits for temporary changes to abstraction licences).
- 1.17 We have targets, agreed with our customers, regarding the average frequency with which drought interventions will be implemented. These are known as levels of service. The aim of the WRMP is to ensure that we can meet customer demands for water in a dry year without the need for drought interventions at a frequency that exceeds the stated level of service.
- 1.18 We consulted household and non-household customers on levels of service for water use restrictions specifically seeking their feedback on whether the levels of service should deteriorate, be maintained, or improved⁸. The main findings are summarised as:
- Customers did not want deterioration in the levels of service. This was particularly the case for the more severe restrictions such as rota cuts and drought permits
 - The current expected frequency of sprinkler bans, hosepipe bans (TUBs) and NEUBs were not perceived to have significant impacts on customers' day-to-day activities and as such customers indicated that they were broadly satisfied with these levels of service
 - Customers did show support for improved levels of service for the more severe restrictions. For rota-cuts (Level 4 restrictions), both household and non-household customers showed some support for an improvement in the level of service
- 1.19 We also updated our Drought Plan, as part of which we worked with the other water companies across the South East and have adopted a coordinated approach with consistent levels of service now in place across the region.
- 1.20 Our Drought Plan⁹ was approved by the Secretary of State for Environment, Food and Rural Affairs in August 2022. It sets out the actions we would take, and when we would take them, during and after periods of prolonged dry weather. Our levels of service to customers, as stated in our Drought Plan, are shown in Table 1-1.

⁸ WRMP19 Appendix T: Our customer priorities and preferences

⁹ Thames Water Drought Plan, August 2022

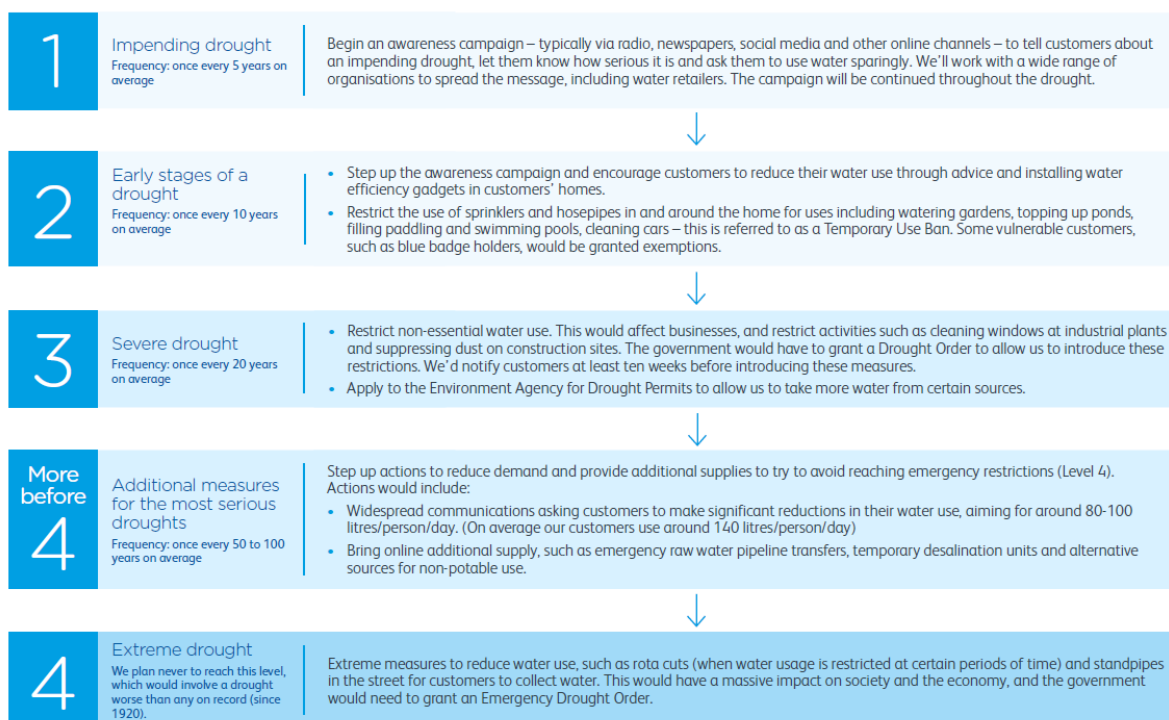


Table 1 - 1 Our levels of service and actions we'll take in a drought

- 1.21 Our draft WRMP24 has been developed to increase our resilience to droughts of a severity of 1:200 years in the early 2030s and to droughts of 1:500 years by 2040. When we have investment in new sources to achieve the increased level of drought protection for our customers, we will be able to reduce the frequency with which we use drought permits which can be environmentally damaging. Drought permits would be used only in very extreme circumstances when we experience droughts of greater severity than 1:500, assuming the required options and new water sources are constructed as set out in our WRMP.

Planning framework and policy context

- 1.22 The planning framework for water resources has changed significantly since our last plan, WRMP19, due to a wide recognition of the need to address the significant future challenges faced for water supply and invest to ensure a secure and sustainable water supply for future generations, as well as protecting the environment.
- 1.23 In 2020 the Environment Agency published the National Framework for Water Resources¹⁰. This built on the cross-sector work to develop a long-term planning framework¹¹ and the work completed by the National Infrastructure Commission (NIC)¹², which set out its recommendations on what was required to meet the water resource challenges the UK faced in the future, and highlighted the high economic cost of a failure to act. Also, at the last Price Review, PR19, Ofwat made funding available for companies to work together to look at a range of strategic options including transfers, reservoirs and water recycling.
- 1.24 The National Framework is the backdrop to the development of the draft South East regional plan and our draft WRMP24, and the main components are described in the following sections.

National Framework for Water Resources

- 1.25 The National Framework presented a picture of England's future water needs by 2050, taking account of the water needs of the environment and all water using sectors. It strengthened the role of regional planning, with five regional groups established across England as shown in Figure 1 - 2. Each regional group is required to produce a strategic plan which can adapt to future challenges and identify the set of options that present the best value to customers, society and the environment that need to be developed to secure long-term resilience. Furthermore, the National Framework set out the need for the regional groups to work together to ensure that the plans are aligned, and when combined meet the national need, through a process of 'regional reconciliation'.

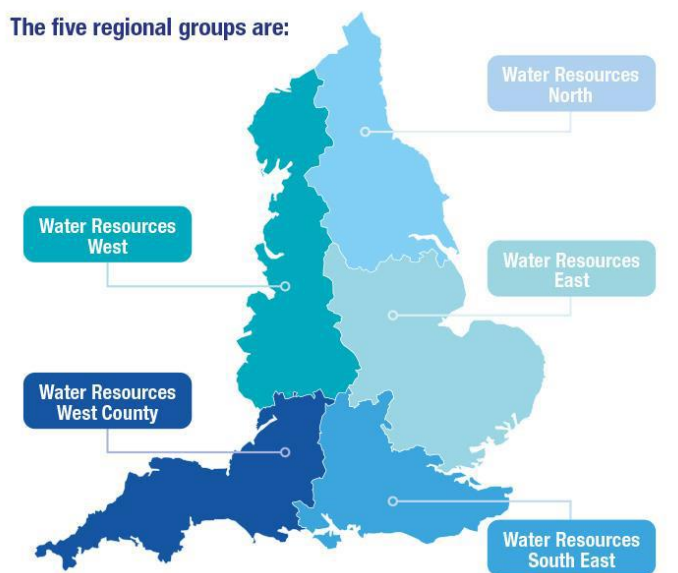


Figure 1 - 2 The regional water planning groups

¹⁰ Environment Agency, National Framework for Water Resources, 2020

¹¹ WaterUK Long term water resources planning framework, 2016

¹² National Infrastructure Commission (NIC) Preparing for a Drier Future, 2018

1.26 Other important aspects of the Framework included the need for:

- An adaptive planning approach with the need to carefully track progress of factors such as water demand, population, climate change and environmental improvements, and identify clear decision points where alternative approaches may need to be brought in. These decision points are to make sure there is enough time for alternative approaches to be adopted should the future not follow the expected track
- A shared ambition to improve the environment and address unsustainable abstraction of water with agreed steps for short, medium and long-term changes, recognising that developing alternative supplies of water takes time

Water Resources South East (WRSE) and the South East regional plan

1.27 Water Resources South East (WRSE) is an alliance of the six water companies which cover the South East of England – Affinity Water, Portsmouth Water, SES Water, Southern Water, South East Water and Thames Water.

1.28 WRSE's work on this regional plan started in September 2019 and since then the water companies have worked collaboratively to develop technical processes and procedures applied both in the regional plan and the companies' own draft WRMPs and to prepare a regional plan. WRSE has worked collaboratively with other water using sectors, regulators and stakeholders throughout the development of the regional plan:

- WRSE established a Multi-Sector Group to ensure all sectors, beyond public water supply, had a voice in developing the regional plan and ensure the plan accommodated their future water needs
- Regulators are part of the Senior Steering Group and are represented on the Programme Management and Engagement and Communications Boards which lead the technical and engagement workstreams respectively to support the development of the draft regional plan
- WRSE established stakeholder groups to share information and approaches at formative stages to seek input and comments, and has also engaged extensively with the wider stakeholder community through consultations, webinars and meetings

1.29 WRSE has worked closely with the other regions in preparing the draft regional plan, including undertaking several stages of reconciliation through which the potential for inter-regional transfers have been tested and verified.

1.30 WRSE published its emerging regional plan¹³ in January 2022 for public consultation. The emerging plan set out how it planned to achieve a secure, resilient and sustainable supply of water for our customers and other sectors, across a challenging range of potential futures, giving early sight of the big issues and emerging solutions to gain initial feedback from stakeholders. WRSE will publish the draft best value plan for the region in mid-November 2022, alongside the water companies' statutory draft WRMP24s. The consultation on the draft regional plan is a non-statutory consultation.

¹³ WRSE Emerging Regional plan, January 2022

- 1.31 The South East water companies will reflect the South East regional plan in their draft WRMP24s. Figure 1 - 3 illustrates the relationship between the regional plan and the South East water companies' WRMPs.

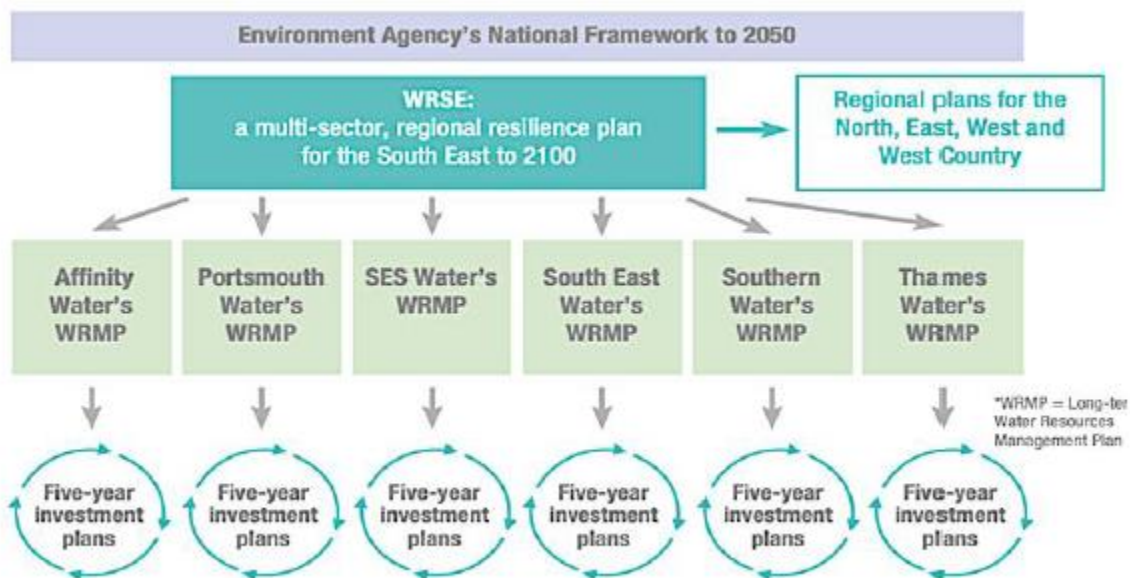


Figure 1 - 3 Relationship between the South East regional plan and water company WRMPs

Water Resources Planning Guideline (WRPG)

- 1.32 The WRPG, produced by the Environment Agency, Ofwat and Natural Resources Wales provides a framework to guide the preparation of WRMPs. The document set out the legal requirements, government policy and the technical approaches to follow to develop a WRMP, as well as the information that the plan should contain. The WRPG was revised for this round of water resource planning and included a number of changes including the requirement for water companies to set an environmental destination and plan for enhanced resilience to droughts of 1:500 years severity by 2040.
- 1.33 We have referred to the WRPG in preparing the regional plan and our draft WRMP24 and discussed aspects of the guideline with regulators throughout the development of the plans.

The 25 Year Environment Plan and the Environment Act 2021

- 1.34 In 2018 the Government published its 25-year plan for the environment¹² which committed to achieving clean and plentiful water by improving at least three quarters of our waters to as close to their natural state as soon as is practicable. Abstraction of water can impact on the health of river and groundwater sources. If too much water is abstracted, less is available as a habitat for wildlife and pollutants will potentially be more concentrated. The requirements have been considered in the development of the regional plan and in turn our draft WRMP24 including:

- Our destination for environmental sustainability
- The use of natural capital in decision making
- The focus on providing net gain for the environment by providing opportunities for biodiversity gain and enhancement
- Consideration of a catchment approach and nature-based solutions

- 1.35 The Environment Act, which achieved Royal Assent in November 2021, aims to protect and enhance the environment through regulating improvement of air and water quality, tackling waste, increasing recycling and improving the natural environment. It will set legally binding targets for the following core areas: waste and recycling, clean air, nature, and water. The Act includes a strengthened biodiversity duty which includes Local Nature Recovery Strategies to support a Nature Recovery Network and the provision for a legal requirement to provide biodiversity net gain for certain types of development.
- 1.36 Further provisions in the Act include effective collaboration between water companies through statutory water resources management plans, drainage and sewerage management planning as a statutory duty, minimising the damage water abstraction may cause on the environment, and modernising the process for modifying water and sewerage company licence conditions. Section 2 provides more information about our approach to protect and improve the environment.

Water Industry National Environment Programme (WINEP)

- 1.37 WINEP is the programme of work water companies in England are required to do by the Environment Agency and Natural England to meet their obligations under environmental legislation and UK government policy. It sets out how the water industry will contribute to improving the natural environment.
- 1.38 The WINEP is the most important and substantial programme of environmental investment in England. For 2020 to 2025 it consists of £5.2 billion of asset improvements, investigations, monitoring and catchment interventions¹⁴.
- 1.39 Whilst the WINEP provides the actions required in the short-term to be compliant with environmental legislation, the process does not lend itself to considering a more collective longer-term approach such as the impact climate change might have on the availability of water in the future. The consideration of levels of environmental ambition through the regional and WRMP planning process address a collective longer term approach.
- 1.40 In July 2021, Defra and the Environment Agency consulted on a review of WINEP which included consideration of how the programme could allow for more flexibility to deliver better environmental outcomes, for example, enabling greater use of nature and catchment based solutions, shifting focus of investment away from the 5-yearly cycle towards an option development process that promotes more innovation and company collaboration. (Sections 2 and 5).

Water Framework Directive (WFD)

- 1.41 The WFD, and the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, promote increased awareness of catchment processes and challenges the established dependence on a 'treatment-led approach' for the supply of Drinking Water Directive compliant potable water. We need to take account of the requirements of the WFD, and this includes the environmental objectives in the River Basin Management Plans (RBMPs). We are encouraged to review solutions that have been identified in RBMPs and identify where these may require partnership working with others in the catchment to achieve the solution.
- 1.42 The WRPG also requires us to look towards targeted and cost-effective implementation of restoration measures required at the catchment scale, with water companies either working alone or in partnership with catchment based organisations. Outcomes from such measures can be

¹⁴ Defra, EA & Ofwat, Review of the water industry national environment programme – consultation document July 2021

uncertain, and we need to take account of these uncertainties in our adaptive planning, with pre and post project monitoring to understand the success and benefits (Section 9).

Strategic Environmental Assessment (SEA)

- 1.43 The SEA Directive and associated regulations (retained as UK law following Brexit) require an assessment of the likely significant environmental effects of certain categories of plans and programmes.
- 1.44 WRSE undertook an SEA based assessment to identify where it may give rise to likely significant effects on the environment. We drew on this work, taking account of additional local information, to complete an SEA of our draft WRMP24 (Section 9).

Habitats Regulations

- 1.45 Habitats Regulations Assessment (HRA) refers to the assessment of the likely or potential effects of a plan or project on one or more European designated sites. A plan or project cannot normally be enacted or adopted unless it can be shown that it would not have a likely significant effect on, or an adverse effect on the integrity of, a European designated site, either alone or in-combination with other plans or projects. In exceptional cases, a plan or project can be authorised or adopted despite having an adverse effect on the integrity of a European designated site, provided there are no alternatives, there are imperative reasons of overriding public interest and any appropriate compensation is secured.
- 1.46 In developing our plan, we have considered the requirements of the Conservation of Habitats and Species Regulations 2017 and have undertaken a Habitats Regulations based assessment of our draft WRMP24 where there are likely significant effects on European designated sites. See section 9 to read more about our approach.

Links with other plans

- 1.47 The WRMP is closely related to a number of other plans and strategies. In the section we set out the relationship with other plans.

Business Plan

- 1.48 Water companies are required to produce a business plan every five years which sets out the services to be provided to customers. Funding for the business plan is secured through Ofwat's Price Review process.
- 1.49 For this round of planning Ofwat has asked¹⁵ water companies to set out their five-year business plans in the context of a 25-year long-term delivery strategy, which outlines the long-term outcomes the company aims to deliver, and how they will deliver them in a range of plausible futures. The approach includes using adaptive planning to present the strategies, future scenarios to test and develop the adaptive pathways, and providing evidence that the strategy represents the best way to meet long-term objectives.
- 1.50 The WRMP is a key component of the business plan, with the first five years of the WRMP included in the business plan to secure the necessary funding, furthermore the long-term strategic approach now adopted in both plans is coordinated to ensure a consistent vision and strategy; the use of common approaches and data; and the identification of synergies and multi-benefits where feasible. Also when engaging with customers and stakeholders throughout the development of these plans we do so with this context to ensure a clear and transparent approach for our customers.

Drought Plan

- 1.51 The Drought Plan (DP) is a statutory plan prepared on a five-year cycle to describe the short term operational steps that water companies will take as a drought progresses to manage customer demand, enhance available supplies and minimise environmental impacts.
- 1.52 Our WRMP is closely related to our DP¹⁶. It includes drought options within the basket of measures that are available for selection, including both measures to reduce demand, tackle leakage, and to temporarily increase available water supplies in a drought through use of TUBs, NEUBs, drought permits and drought orders.
- 1.53 We updated our DP in 2021 in accordance with the Drought Plan Guideline¹⁷ and consulted on it. Our updated DP was approved by the Secretary of State in August 2022.
- 1.54 Due to the unprecedented weather conditions during winter 2021 and summer 2022, with an extended period of low rainfall combined with the hottest temperatures on record and the River Thames reaching its lowest level since 2005 which led to a drop in reservoir levels in the Thames Valley region and London, we had to implement our DP in 2022. This included an extensive communication campaign starting in May, a step up of our activity to find and fix leaks and the introduction of a TUB, across London and the Thames Valley on 24 August 2022.

Strategic Resource Options (SROs) and RAPID

- 1.55 There are a number of SROs, some of which were included in the water companies' WRMP19, which are currently being investigated in more detail to better understand the amount of water

¹⁵ Ofwat, PR24 and beyond: Final guidance on long-term delivery strategies, April 2022

¹⁶ Thames Water Drought Plan, August 2022

¹⁷ Environment Agency, Water Company Drought Plan Guideline, April 2020

they can provide, the earliest date the water will be available, the area(s) that would benefit and to identify and address any issues that could stop or delay them from being built.

- 1.56 Ofwat made funding available to a range of water companies to progress SROs. This work is being led by the relevant water companies and overseen by the Regulators' Alliance for Progressing Infrastructure Development (RAPID), which is made up of a team from the Environment Agency, Ofwat and the Drinking Water Inspectorate. The aim is to ensure that any SROs that the regional plan identifies are needed in the early years of the plan, are "construction ready" for the 2025-2030 period.
- 1.57 The delivery of SROs is subject to a regulatory gated process. The purpose of this is to ensure that at each gate:
- Companies are progressing SROs that have been allocated funding at PR19
 - The assessments are appropriate
 - Costs are efficient
- 1.58 At the end of each gate if an option is no longer considered to merit further investigation then investigation of that option ceases through the RAPID process.
- 1.59 At gate one (July 2021), solutions are expected to be a standard suitable for submitting into draft regional plans or draft WRMPs. This stage of the programme is focused on eliminating solutions that are demonstrated to be unsuitable, no longer require further development funding or will not benefit from the structured gate process.
- 1.60 At gate two (November 2022), the intention is that solutions will be developed to a standard suitable for submitting into final regional plans or WRMPs. At this stage, the focus is on viability and carrying only optimal solutions to the pre-planning stage.
- 1.61 Thames Water has worked collaboratively with other partners on five SROs – Severn to Thames Transfer; London Water recycling; South East Strategic Reservoir Option; and transfers to Affinity Water and Southern Water. The gate 2 reports for each of the SROs will be submitted to RAPID on 14 November 2022 and published at the same time as the draft WRMP24, in accordance with regulatory guidance.
- 1.62 The SROs have been considered alongside other options in the development of the regional plans and draft WRMPs.

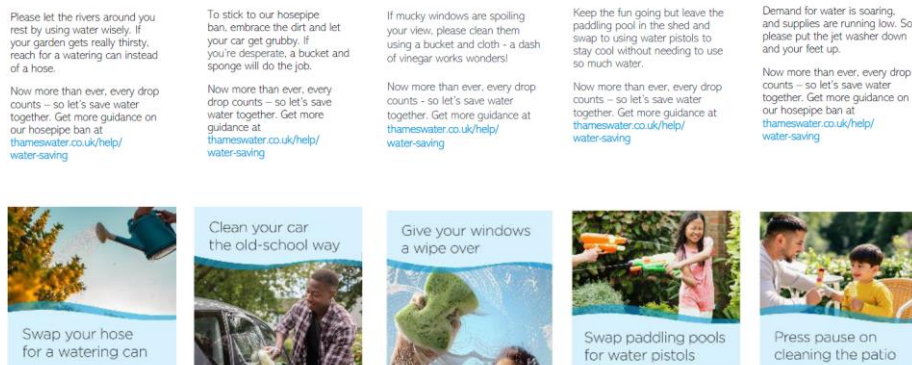
River Basin Management Plans (RBMP)

- 1.63 RBMPs set out how organisations, stakeholders and communities will work together to improve the water environment. This is important context to the development of the WRMP. Appendix B (SEA) and Section 9 (Environmental Appraisal) reference the RBMPs in setting the key policy messages and establishing the environmental baseline. In addition, a specific objective is included in the water topic of the SEA to support achievement of the RBMP objectives.
- 1.64 Our WRMP contributes to the objectives set out in RBMPs by:
- Looking at a wide range of options to develop a plan for the South East region to ensure a sustainable future water supply (Sections 7 & 8)
 - Working closely with our household and business customers to support and encourage the wise use of water, this includes the ongoing programme of providing smart meters to

households as well as ongoing communications such as the water saving tips and videos communicated via social media during summer 2022

Water saving tips social posts

Tips to help our customers save water

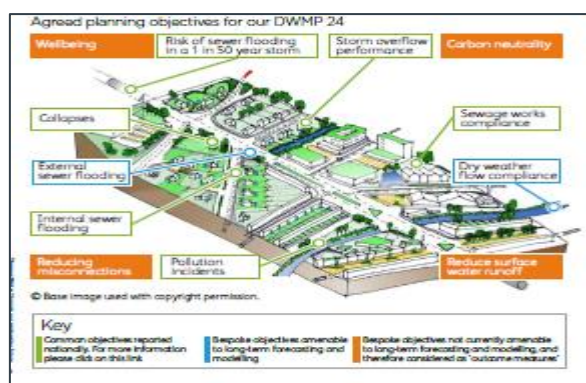


- Assessing new schemes with regard to WFD requirements and other legislation to prevent deterioration and support achievement of protected area and water body status objectives for example the size of a new river abstraction close to Teddington, a scheme included in our draft WRMP24, which has been reduced in size due to environmental concerns and a water recycling scheme at Deephams, previously included in WRMP19, has been omitted from our draft Plan in the period up to 2060
- Proposing ambitious reductions in abstraction from sensitive chalk streams and watercourses to protect and improve the environment
- Looking at integrated catchment-based solutions which have the potential to deliver multiple benefits, working in collaboration with our other plans (WINEP, DWMP and wider business plan activities). In the context of WRMP, we are particularly interested in developing nature based solutions which can either produce a water resources or biodiversity net gain benefit accompanied by wider benefits to the local environment and communities

Drainage and Wastewater Management Plans (DWMPs)

- 1.65 We published our first draft DWMP in June 2022 for public consultation. The DWMP performs a similar role to the WRMP, but for wastewater and drainage services. The DWMP sets out the long term strategy for the management and treatment of drainage and wastewater, adopting both infrastructure and nature-based solutions to meet the forecast future challenges.





1.66 Our WRMP and DWMP teams worked together to align the plans as far as practicable, recognising the different stages of maturity of the two plans. The work included:

- Alignment of baseline assessments including growth forecasts, water consumption and climate change projections
- Shared approaches and methodologies including option appraisal and problem characterisation
- An illustrative 'alignment pathway' that could lead towards full catchment-based systems thinking and joint strategic planning

1.67 Appendix Y presents the work we have completed to align the plans and facilitate a coordinated approach.

Drinking water quality and safety plans

1.68 The quality of drinking water we source for the future is paramount. As part of our planning we have followed the Drinking Water Inspectorate's published guidance¹⁸.

1.69 We have also worked with our drinking water safety plan (DWSP) team in developing our draft WRMP24. We have used the DWSP, which provide a means of identifying hazards and hazardous events that could arise in the catchment area from the source up to the customer's tap, in the assessment of the strategic supply options. We engaged with DWI as part of these assessments. This information is presented in the SRO Gate 2 reports.

Local Authority plans

1.70 In line with the WRPG we developed forecasts for population and property growth drawing on local plans published by the local council or unitary authority. We contacted the 95 local authorities in our supply area to collate data from their local plan data to forecast future growth. Based on their plans, we estimate that the number of customers in our area will grow by more than two million people to over 12 million by 2050. Our WRMP therefore reflects local growth ambitions and we have used the local authority growth scenario as our reported pathway to ensure we are planning to meet the additional needs of new businesses and households in line with the WRPG. We also developed and used other forecasts for growth including ONS data which we have used to develop our adaptive plan. (Section 3)

Local Nature Recovery Strategies

1.71 We are committed to protecting and improving the environment. This includes working to increase the biodiversity across our sites through improving the condition of existing habitats by changing

¹⁸ DWI Guidance Note: Long term planning for the quality of drinking water supplies, July 2022



the management regimes of grassland and creating new habitats including wetlands, woodlands and hedgerows. For the WRMP specifically we are aiming to achieve a net 10%+ biodiversity gain across our plan (Section 2).

Engagement with regulators, stakeholders and our customers

- 1.72 There is wide interest in the sustainable management of water resources from a diverse range of stakeholders, from those organisations and local communities who have an interest in a specific geographical area, watercourse or single option to organisations who have a broad interest in the sustainable management of resources for the long term. As such, engagement with regulators and stakeholders has been an important part of the development of the regional plan and our draft WRMP24.
- 1.73 The regional plan is the foundation for the South East water companies' draft WRMP24 and the schemes in the regional plan cascade down to individual companies. It is therefore important that stakeholders understand the overall strategic planning process, the key decision points, and opportunities to contribute.
- 1.74 Furthermore, the greater focus placed on regional plans required a step-change in approach and the South East water companies, working through WRSE, invested considerable resource to develop new approaches and analysis tools and techniques. WRSE committed to work openly and transparently throughout this detailed technical work, sharing information in a timely way to build understanding and seek active participation.
- 1.75 As well as the engagement through the development of the regional plan, we also undertook pre-consultation activity with regulators and stakeholders on our draft WRMP24.
- 1.76 This section sets out the engagement undertaken with regulators, stakeholders and customers on the regional plan and draft WRMP24, with more detailed information presented in Appendices S and T.

Working with WRSE

- 1.77 Since 2019 we have worked closely with WRSE to support the extensive engagement with regulators and stakeholders. This included:
- Membership of the Environment Agency on the WRSE Programme Management Board (PMB) and the Engagement and Communication Board (ECB) ensuring they were engaged in the definition of technical and engagement work with opportunity to input and shape the approach and work alongside the water companies
 - Established stakeholder groups with representation from water users across the region to help guide the development of the plan. The groups are the stakeholder advisory board, environmental advisory group and the multi-sector stakeholder group. In addition, a regional Customer Challenge Group was established to guide and challenge the work with customers
 - In addition to these specific groups, WRSE held one to one meetings, joined conferences and sectoral meetings, and hosted meetings, webinars and consultations to provide opportunities for the wider stakeholder community to engage and participate in the development of the plan
- 1.78 The framework is shown in Figure 1 - 4

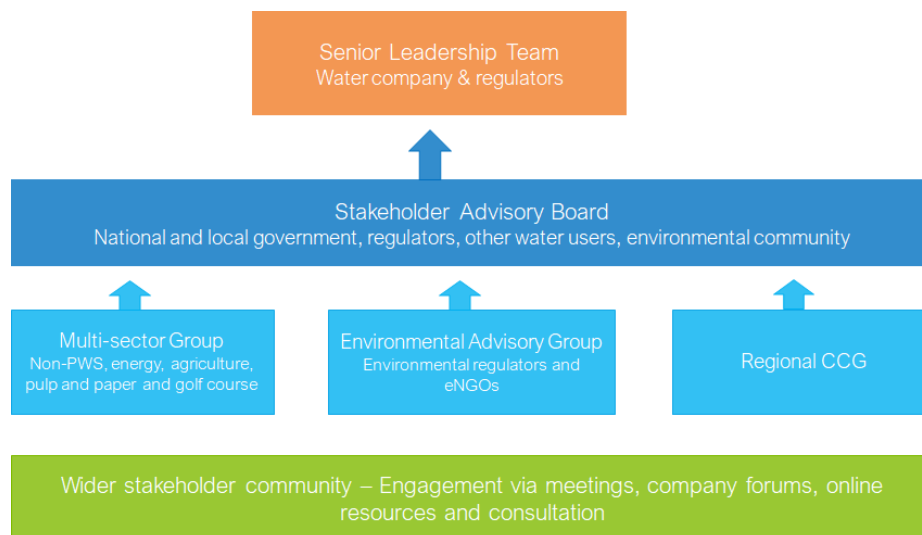


Figure 1 - 4 WRSE Stakeholder Engagement framework

1.79 Through the engagement WRSE has sought to:

- Develop a plan which provides a secure and sustainable water supply which meets the future needs for public water supply and other sectors, supports the well-being of society and economic growth
- Agree the strategic challenges facing the region, e.g. climate change, population growth, protection and enhancement of the environment, as well as the foundation data and scenarios used to develop the planning forecasts
- Inform the policies adopted in the plan – specifically around key areas such as environmental ambition, risk and resilience, and the use of drought orders and permits
- Build an understanding of, and agreement to, the technical methods, data and assumptions employed in the plan
- Contribute to the solutions considered in the plan, including catchment, nature based and multi-sector solutions, as well as proposals for innovative solutions
- Engage on the SROs considered in the development of the plan
- Consult on and agree the objectives, criteria and metrics used to inform the development of the best value plan and build an understanding of, and agreement to, the decision-making process to help determine the preferred plan
- Gain support for the overall plan, and where there are areas of challenge to understand the basis for the challenges and be able to clearly articulate and evidence the approach and decisions made

1.80 The WRSE engagement and consultation programme had three main phases:

- **Plan and prepare** – up to 2020, the focus was on the building blocks of the plan. This included consultation on the future challenge¹⁹; resilience framework²⁰; the policies²¹;

¹⁹ Future Water Resource Requirements consultation, March 2020

²⁰ Resilience Framework consultation, June 2020

²¹ Regional policies, August 2020

and method statements²² that set out the processes and procedures to be followed. WRSE ran webinars and held consultations to give stakeholders the opportunity to engage and input to the process

- **Develop** – During 2021 WRSE shared information on feasible solutions²³, including the SROs, consulted on the objectives, criteria and metrics²⁴ to determine the best value regional plan and explained the adaptive planning approach²⁵

An overview of the engagement activity completed through to summer 2021 is presented in Figure 1 - 5.



Figure 1 - 5 Overview of engagement activity to July 2021

- **Consult and update** – In January 2022 WRSE published the emerging plan, for consultation. The emerging plan gave early sight of the big issues and emerging solutions and sought initial feedback as a step in the process of plan development. The consultation was open for an 8-week period. WRSE received over 1,150 written responses to the consultation as shown in Figure 1-6. In May 2022 WRSE published its response²⁶ to the consultation which provided a summary of the consultation responses, highlighted the main themes and issues raised in the responses and provided WRSE's consideration of the points and changes to the plan. The changes included modifying the adaptive planning framework, expansion of the population forecasts, redefinition of the environmental forecasts and work to ensure accessibility of documentation

²² Method Statements, overview webinar followed by topic specific webinars and consultation, August - October 2020

²³ Option webinars to showcase the range of options under consideration and provide an opportunity to discuss and comment on the options, May - June 2021

²⁴ Best Value Plan objectives, criteria, and metrics webinar and consultation, February 2021

²⁵ Webinar on adaptive planning to share WRSE's approach to develop an adaptive plan, June 2021

²⁶ Emerging Regional Plan Consultation Response Document, WRSE, May 2022
<https://www.wrse.org.uk/media/wbdj0jdd/wrse-emerging-regional-plan-consultation-response-document-may-2022.pdf>

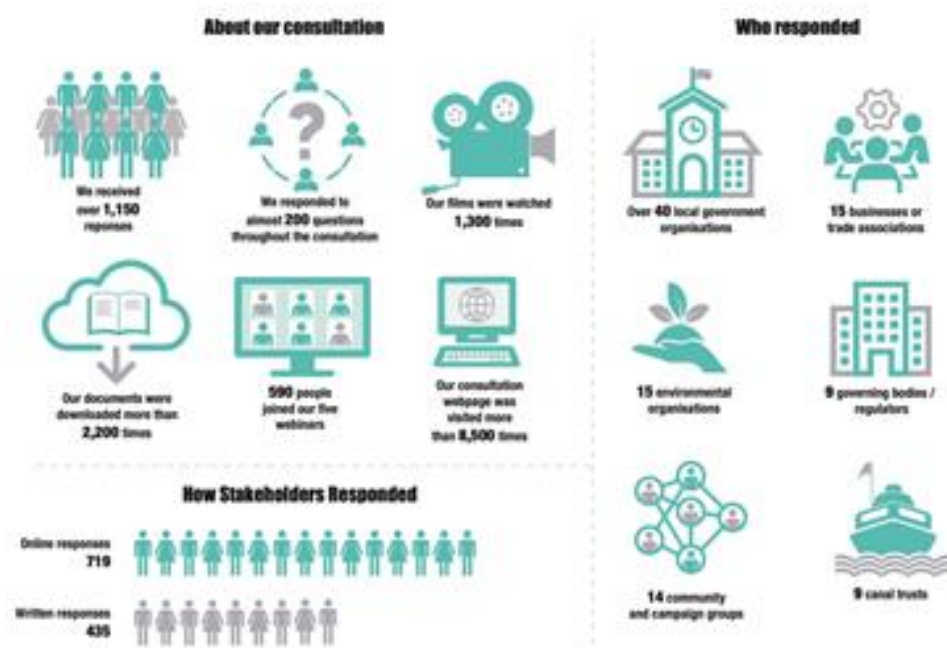


Figure 1 - 6 Consultation on the WRSE emerging plan

- 1.81 WRSE has published a report²⁷ on the programme of engagement undertaken to inform the development of the regional plan.

Company-led engagement on the draft WRMP24

- 1.82 We have also engaged separately with regulators and stakeholders to share information on our draft WRMP24 as it was developed. The engagement included:
- Monthly pre-consultation meetings with the Environment Agency to discuss our approach and technical aspects of our plan and to provide the opportunity for regulators to raise concerns, contribute to the work, and to agree approaches and technical methods. We also provide 6-monthly and annual progress reports to the EA on WRMP19
 - We held two pre-consultation meetings with Ofwat to update them on our progress in developing our draft WRMP24 and to seek their feedback. This has been helpful and facilitated discussion on several points including the deferment of supply schemes from WRMP19 delivery, the baseline demand management calculation and the approach to developing the leakage strategy. In addition, we have engaged with Ofwat, through RAPID, focused on the SROs
 - In the preparation of the SEA, HRA and WFD assessments for the WRMP24 we have worked with statutory regulators (Environment Agency, Natural England, Historic England and Natural Resources Wales) and wider stakeholders. We drew on the consultation led by WRSE on the scope of the SEA for the regional plan and undertook

²⁷ WRSE, Stakeholder Engagement report, January 2022 <https://www.wrse.org.uk/media/0f514ug4/stakeholder-engagement-report-january-2022.pdf>

further consultation on the scope and approach of the SEA, the methodology for the HRA and WFD assessments, and the output of the assessment of options for WRMP24.

- We held three quarterly pre-consultation meetings with Natural England where we discussed our approach to environmental assessments for our options, both at Stage 1 (high level assessment, carried out with WRSE) and Stage 2 (detailed assessment). We provided updates on the results of our assessments and our reviews of emerging policy changes, particularly where this meant that options needed to be rejected on environmental grounds. We discussed our work with WRSE on SEA scoping and identifying and considering catchment options. We also discussed our overall programme for the environmental assessment of our draft plan
- The primary role of the Drinking Water Inspectorate (DWI) is to ensure the safety and quality of drinking water. We invited the DWI to join our stakeholder meetings, have engaged with the DWI as part of the work on the SROs and held a pre-consultation meeting²⁸ where we provided an update on the work to develop the draft WRMP24
- We have continued to work with NRW, and briefed the Welsh Government, as part of the collaborative work to develop the Severn Thames Transfer, focused on the aspects which could affect Welsh resources and the people of Wales
- We have held nine Water Resources Forums jointly with Affinity Water since 2020. The Forum is open to all interested organisations. Its purpose is to update stakeholders, to provide the opportunity to discuss our approach and to highlight issues and concerns. We seek feedback from attendees on the topics of most interest to them. We share recordings and minutes of the Forum with attendees
- Meetings with MPs, country and district councillors, local authority officers and parish councils and wider stakeholders in Oxfordshire recognising the heightened interest in the potential reservoir in the local area. These meetings have provided the opportunity to have detailed conversations and to listen to issues and concerns
- Meetings with politicians, elected representatives and local authority officers beyond Oxfordshire on water resources planning and to introduce the strategic options that are under consideration including London water recycling and the Severn to Thames Transfer, to share information and seek feedback on the need for long-term planning, the schemes and initial concerns at this early stage of scheme development
- Engagement with environmental NGOs including Chalk Streams First and catchment partnerships to identify opportunities for partnership working and potential schemes. We also published an article in our Environmental Newsletter (Summer 2022) which was sent to over 30 partnerships of over 200 NGOs across our supply area
- Engagement with the wider stakeholder community to raise awareness of the pressures on our water resources and the need to plan ahead including the University of Oxford, CBI, London First, Thames Valley Chamber of Commerce and NFU
- Engagement with the Thames Water Customer Challenge Group (CCG) to brief them on the regional plan and our WRMP with specific focus on the governance, open and transparent working approach and decision making and wider engagement

²⁸ Thames Water & DWI WRMP24 pre-consultation meeting, August 2022

- Engagement with other water companies, Waterwise, retailers and other organisations to continue to develop and roll out programmes of activities to promote the efficient use of water
- Engagement with the housing developer community to raise awareness of pressures on our water resources and the need to plan and build more water efficient homes. We launched an incentive scheme early in 2022 to encourage developers to achieve water neutrality
- Corresponded with over 200 stakeholders at the beginning of July 2022 to raise awareness of the draft WRMP24 - its purpose, the work completed to date, the main changes since WRMP19 and the consultation on the draft WRMP planned for November 2022
- Continued dialogue with water companies and external organisations to identify opportunities for collaboration and partnerships including identification of opportunities for sharing and trading resources to ensure the most effective use of available resources
- Specific engagement with regulators and stakeholders on the SROs, details of the engagement activities are presented in the Gate 2 reports for the options
- A full account of the engagement undertaken to support the development of our draft WRMP24 including how we have listened and taken account of feedback, is presented in Appendix S

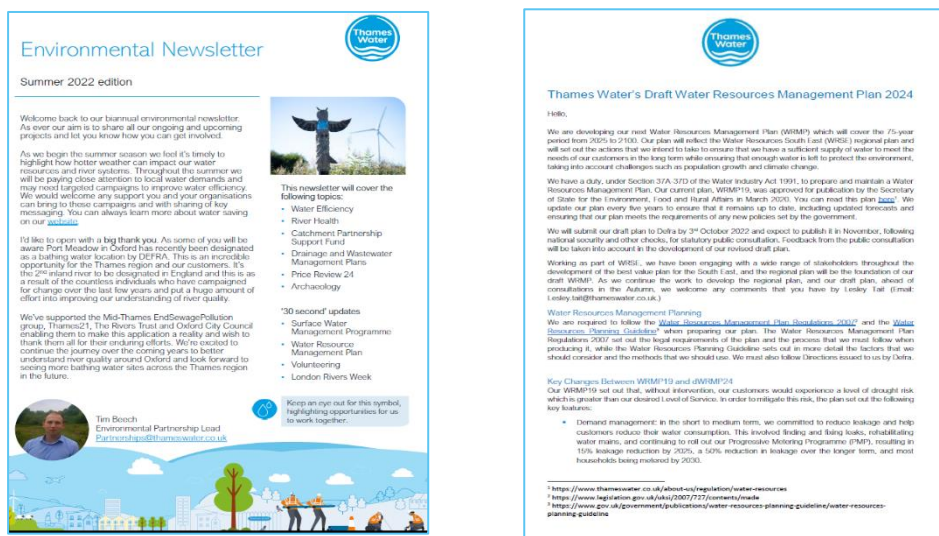


Figure 1 - 7 Environmental Newsletter and pre-consultation letter

WRMP24 – Research with customers

- 1.83 Customer engagement has been an important part of developing our draft plan. The regulatory framework²⁹ sets out the requirement to ensure we engage with our customers, and understand their priorities and preferences and use these to inform the development of the regional plan and our WRMP24 to ensure we deliver value to our customers over the long term.
- 1.84 The engagement has included regional, company and scheme specific work. We used independent agencies to conduct the customer engagement, ensuring expert input and challenge as well as helping to shape innovative approaches. We worked with the regional Customer Challenge Group (rCCG), which was made up of Consumer Council for Water (CCW) alongside representatives of the South East water company's own CCGs, on the regional studies.
- 1.85 A summary of the research studies undertaken including the scope, how the insight has been used to inform the development of the plan to date and ensure the successful implementation of the plan, is presented below. Full information is presented in Appendix T.
- **Customer feedback on planning principles, policies and potential demand and supply options³⁰:** Collaborative research with water companies from across the South East to seek customers' views on resilience planning, supply, and demand options, sharing resources and the SROs. The research comprised three phases, with the first phase compiling insight from previous research completed at PR19 and WRMP19 followed by qualitative and then quantitative research. Key insights were:
 - Customers are fully supportive of the coordinated and collaborative approach to developing the regional plan
 - There is a strong expectation that the plan will deliver beyond the minimum requirements for ensuring long-term security of supply, by reducing the dependency of the system on the environment, and building in additional capacity into the system to ensure against wider uncertainty
 - Whilst some limited aspects of extreme drought measures (rota-cuts/standpipes) may be felt intolerable, most restrictions on the use of water that would be in place are generally acceptable to customers although there is support for further reducing the risk of these measures being needed
 - Reducing leaks and saving water were considered by customers to be the foundation and a pre-requisite for sharing resources. After this, the right supply options were ones that were reliable, avoid environmental harm, and provide wider benefits including enhanced local amenity and recreation opportunities such as reservoirs. The engagement provided a hierarchy of preferences for options. The option preference weights informed the creation of a customer preference metric, one of the best value metrics, used in the decision making to inform the draft regional plan
 - **Customers' preferences for best value criteria³¹:** Collaborative research with water companies from across the South East to seek customer feedback on the best value criteria used in the development of the best value regional plan. The research findings showed that customers place more weight on the delivery of a secure supply of water, followed by cost or environmental improvements, and then resilience in respect of

²⁹ PR24 and beyond: Final guidance on long-term delivery strategies,

³⁰ WRSE, Phase 1 Research, ICS/Eftc Customer preferences to inform long term water resource planning.

³¹ WRSE, Phase 2 Research, Eftc, June 2022

adaptability and flexibility. These criteria were given more weight than the customers preferences for the options. This information has been used in the investment model to inform the selection of a preferred regional plan

- **What customers, communities and stakeholders want³²:** We have an ongoing approach to compile evidence of customers' preferences and views including existing research and engagement; ongoing satisfaction surveys and complaint data; external insight sources and targeted research. This information is consolidated for the business to use to inform the day to day operations and ensure its plans and strategies deliver what customers, communities and stakeholders want. Specifically in respect of water, here's an overview of what customers, communities and stakeholders want
 - A constant supply of safe, high-quality water at good pressure – this was identified to be the highest ranking of 15 “customer wants”
 - To fix leaks to reduce wasting drinking water
 - To be self-sufficient and ensure a reliable supply of water into the future

1.86 When customers were asked to look across all the business areas a constant supply of safe, high-quality water at good pressure – was ranked as the highest priority as shown in Figure 1 - 8.

- In terms of the environment, the priorities are:
 - To stop polluting rivers and to improve their quality (#7)
 - To reduce the strain on the environment and restore environmental habitats (#8)
 - To reduce emissions and reach net zero (#10)
- In terms of community impact, the priorities are:
 - To minimise the impact of your operations (#13)
 - To be responsible and transparent (#14)
 - To give something back to the community (#15)

1.87 We have used this information in developing the regional plan and our draft WRMP24.

³² Thames Water, What Customers, Communities and Stakeholders Want, A summary of our customer, community and stakeholder insights, August 2022 – Note this document is regularly updated to take account of new insight



Figure 1 - 8 Overview of ranking of “customer wants”

- Deep dive on sustainable abstraction³³:** We engaged with our online panel, Customer Voices, on eight potential future investment proposals including reduced river abstraction. The research aimed to understand customers’ expectations around sustainable abstraction to improve the environment, beyond current statutory requirements and the pace of the ambition. Key findings were:
 - Customers are broadly happy at the progress to date and all supported action to further reduce abstraction to protect the environment
 - Over half of customers believe we should act between 2025 and 2030, whilst others suggested that reductions should be achieved over a longer time and see this as lower priority compared to some of the other pressing initiatives
 - There are concerns over the cost. Overall customers see this as a necessary action at a manageable cost as they feel the benefits to making this progress (both environmental and to secure a stable water supply) are clear
 - The majority do not require complete certainty of environmental benefits to support reduced abstraction, however some want us to be ‘completely certain’ there would be an environmental benefit before proceeding with reduced abstraction, believing that to do so otherwise, could waste customers’ money

1.88 Of the eight potential enhancement areas for investment, reducing river abstraction was ranked seventh of the eight areas as shown in Figure 1 - 9.

³³ Thames Water, Customer Voices, PR24 Deep Dive Sustainable Abstraction, March 2022

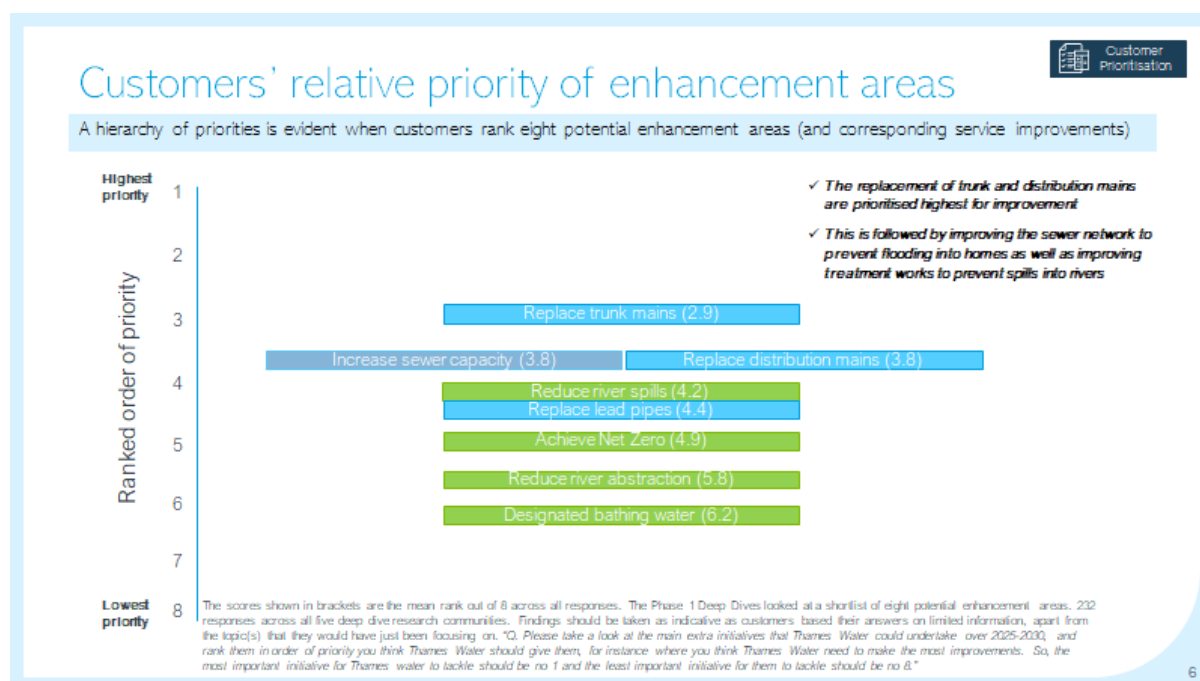


Figure 1 - 9 Customers' relative priority of enhancement areas

- 1.89 This insight was used to inform the environmental destination scenarios we developed. These are presented in Section 5.
- 1.90 There are some tensions which stem from customers prioritising individual impacts such as bill increases over wider societal impacts such as environmental damage. Specifically on water:
- Customers want a resilient water supply that is ready to meet future demand, but they don't want to see large bill rises to deliver security. Some environmental groups prioritise limiting environmental damage over considerations of cost
 - Customers want us to prioritise improving our existing service (through reducing consumption and leakage) ahead of finding new water resources. Given forecast population growth, non-household customers and stakeholders welcomed focussing on both at the same time

These tensions will be an important focus in the consultation on the draft WRMP24 and in developing the Business Plan (PR24)

- SROs and providing wider benefits³⁴:** A collaborative project, across 11 SROs, was designed to explore customers' preferences on the wider benefits that could be included as part of new water infrastructure development and how much customers would be willing to pay for the added benefits. The research has provided important insight to inform the design of the new water resource schemes ensuring the opportunities to provide public value are considered in the early design stages of the schemes and the nature and extent of the added value is in accordance with their preferences. This topic was also explored corporately by Thames Water.

³⁴ Customers preferences on added value for large resource schemes, Accent and PJM economics, August 2022

- **SROs and potential changes to the source water for customers water supply³⁵:** A collaborative project, across 11 SROs, was designed to explore customers' views on potential changes to the source of their drinking water supply and the information and communications that they would want to receive in relation to such a change. The research findings showed that whilst most customers are not able to detect a difference between different water sources they do want to know if there is a change to their supply including the reason for the change and information on the quality and aesthetics of the water. This was particularly the case for water recycling and desalination. This information will be used to inform future engagement and communications with customers if SROs are promoted in the future. This is important to ensure the schemes are acceptable to customers and can be successfully promoted in the future
- **Water recycling³⁶:** Recognising that water recycling is one of the most polarising of new water resource options for customers, we undertook a focused research study with our online customer community to test the acceptability of water recycling with customers in London who could potentially receive recycled water in the near future. The research focused on the communications customers would want including the format and scope of the information to ensure they would be informed and confident in the safety and quality of their water supply if water recycling was used in the future. This was an aspect that was specifically raised by DWI to ensure successful promotion of recycling schemes if they are taken forwards

Further work

- 1.91 We are planning to engage with customers on both the regional plan and draft WRMP24 as part of the Autumn consultation to ensure our customers have a voice in the consultations:
- For the draft regional plan we will explain the plan to customers and test support for the regional plan and sensitivity to bill impacts. We will consider the feedback from customers, alongside feedback to the consultation and set out our consideration and resultant changes to the regional plan
 - For our draft WRMP24 we will engage with Customer Voices, our online community, which is representative of our customer base to seek feedback on our draft WRMP24
- 1.92 We will present this information in our response to the public consultation and explain our consideration of the feedback and resultant changes to the draft plan.

³⁵ Changing water sources, Britainthinks, July 2022.

³⁶ Thames Water, Customer Voices, Water recycling, Verve, August 2022

Engagement with our Board

- 1.93 The Board is accountable to shareholders, customers and other stakeholders for the performance of the company and in promoting its long-term success. As such, the Board is responsible for setting the company's strategy and for leading the development of its business plan and the WRMP, including assuring the quality and completeness of these regulatory submissions.
- 1.94 The Board has provided strategic leadership throughout the business planning process by reviewing and agreeing to the governance and assurance requirements; making key strategic decisions that shape the overall direction of the longer-term strategy; monitoring the progress of preparations; and reviewing and challenging the Executive Team's preparations at key stages. Prior to the approval of the WRMP, the Board assessed the overall quality of the plan based on the findings of the agreed assurance activity and stakeholder feedback.
- 1.95 Our Executive Management Team has engaged the Board at key stages in the development of the WRMP24 and the Board approved the draft WRMP24 prior to submission to the Secretary of State for Food, Environment and Rural Affairs.

Quality assurance

- 1.96 The assurance framework used for this submission is based on a risk-based assurance approach consistent with that documented in the “Statements of reporting risks, strengths, and weaknesses”³⁷ and is based on the three lines of assurance model shown in Figure 1-10. It is also consistent with the assurance requirements laid out in Ofwat’s Company Monitoring Framework³⁸ and meets the assessment criteria defined in the WRPG.
- 1.97 This approach provides an effective programme of assurance which considers areas that are known to be of importance to customers and regulators; or may have a significant financial value, alongside the likelihood or reporting issues. Areas of higher risk receive three lines of assurance while other areas, where the risk is lower, may be targeted with first and second lines only.
- 1.98 A detailed risk assessment was completed against each component of the plan to identify the lines of assurance required. The following assurance was then completed:
- Independent assurance undertaken for the technical data submission to the WRSE regional plan (Mott MacDonald)
 - Independent assurance on the draft WRMP24 data tables (Mott MacDonald)
 - Thames Water review of the assurance undertaken by WRSE to develop the regional plan
 - Thames Water assurance in regard to national security and commercial confidentiality interests
 - Thames Water assurance in respect of drinking water quality obligations associated with the promotion of new schemes in our plan.

³⁷ <https://www.thameswater.co.uk/media-library/home/about-us/investors/our-results/current-reports/statement-of-reporting-risks-strengths-and-weaknesses.pdf>

³⁸ The latest iteration of Ofwat’s Company Monitoring Framework: <http://www.ofwat.gov.uk/publication/company-monitoring-framework-final-position/>

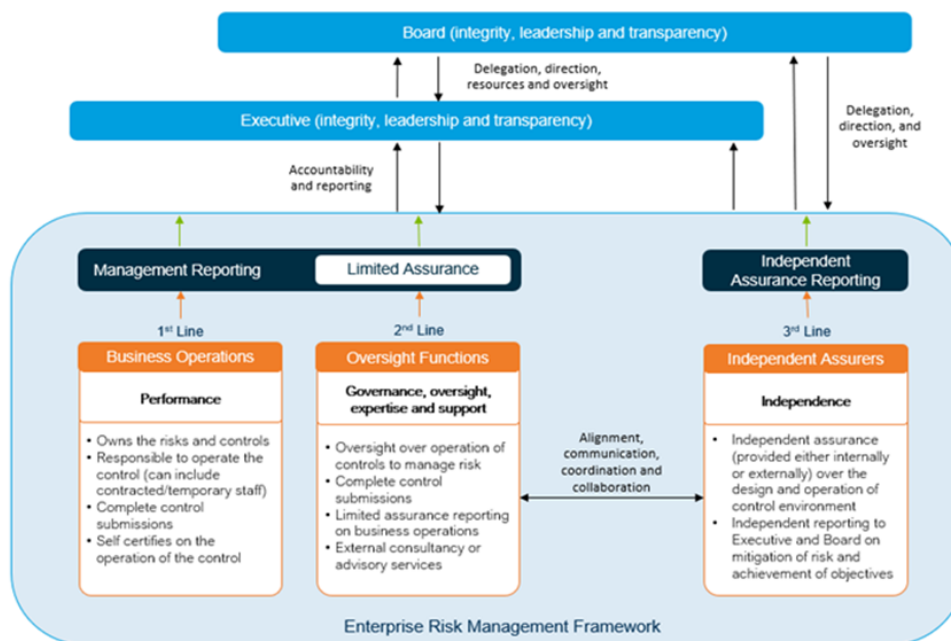


Figure 1 - 10 Assurance approach for the draft WRMP24

1.99 Thames Water confirms that this submission has been prepared in accordance with the following WRPG assessment criteria:

- We have met our obligations in developing our plan
- Our plan reflects any relevant regional plan, which has been developed in accordance with the national framework and relevant guidance and policy, or provides a clear justification for any differences
- Our plan is a best value plan for managing and developing our water resources so we can continue to meet our obligations to supply water and protect the environment, and is based on sound and robust evidence including relating to costs

Public consultation

- 1.100 We will publish the draft WRMP in mid-November 2022, subject to approval from the Secretary of State, on our consultation website www.thames-wrmp.co.uk.
- 1.101 The draft WRMP24 comprises a suite of documents, as noted below, to ensure information is accessible to all interested individuals and organisations:
- An overview document – a summary of our draft plan setting out the challenges, the approach we followed in developing the plan and the best value plan.
 - Technical report – Foreword and 11 sections
 - Technical appendices – 25 appendices plus data tables
 - Supporting technical documents, these include WRSE methodology statements and technical assessments
- 1.102 We will make a paper copy of the draft WRMP24 available to view throughout the consultation period, by appointment, at our offices in Reading. We will send the overview document to stakeholders at the start of the consultation and also to interested individuals and organisations on request. We will also consider requests to receive a paper copy of the full draft plan but there may be a charge made for this.
- 1.103 The consultation will last for 14 weeks. This is a longer consultation than for our previous WRMPs recognising that the Christmas period falls during the consultation, so we want to ensure consultees have sufficient time to make comments on the draft plan.
- 1.104 Consultees can submit responses through a range of channels including emailing or writing a freeform response, responding to an online survey or completing a hard copy feedback form. Information on how to participate and make representations to the consultation will be published in our summary document and on our consultation website www.thames-wrmp.co.uk.
- 1.105 We will promote the consultation to regulators, stakeholders and local communities who could be affected by the proposals in the draft plan and organisations who have been involved in the pre-consultation discussions. We will use a variety of channels including direct correspondence, stakeholder meetings, through media channels and through partners to raise awareness and give as many people and organisations as possible the opportunity to comment on the draft plan.
- 1.106 We will hold meetings and community events to explain the draft plan and the provide the opportunity for dialogue on the plan. The dates and locations of the planned events will be published on our website www.thames-wrmp.co.uk and widely promoted.
- 1.107 We will encourage our customers to participate in the consultation and we will also engage with a representative sample of our customers to seek their feedback on the draft plan to ensure we understand customers' views and preferences and can take these into account in the ongoing development of our plan.
- 1.108 Regulators have advised that they intend to run query process during the consultation, whereby statutory consultees can submit a query and we will have three working days to respond to the request. We will publish the query and our response on our website www.thames-wrmp.co.uk.
- 1.109 Our plan reflects the South East regional plan and includes the potential development of new water sources in partnership with other SE water companies. We will coordinate consultation and

engagement activities with WRSE and other water companies to ensure the approach is clear and efficient for stakeholders, whilst ensuring and recognising that the consultation exercise undertaken on each document are separate and independent processes.

- 1.110 In May 2023 we will publish a statement of response this will set out the consideration that we have given to the representations and the changes we have made to the draft plan in response, or if no changes the reasons for this alongside any new information or data considered during the consultation period. We will send the statement of responses to everyone who participated in the public consultation, providing we have correct contact information, and to the Secretary of State.
- 1.111 The Secretary of State will then review our draft plan, the representations made and our statement of response and with technical advice from the regulators will decide on the next steps. These steps will be either to advise that the plan can be published, direct for further work, or decide to hold a public hearing, inquiry or examination in the public interest to consider points in more detail.

Annex 1: Board Assurance Statement

Board Statement

1.112 Having reviewed the draft WRMP and all relevant supporting assurance, the Thames Water Board makes the following statements:

- We have met our obligations in developing our plan;
- Our plan reflects any relevant regional plans, which have been developed in accordance with the national framework and relevant guidance and policy, or, where relevant provides a clear justification for any differences; and
- Our plan is the best value plan for managing and developing our water resources, so we are able to continue to meet our obligations to supply water and protect the environment and is based on sound and robust evidence including relating to costs.

1.113 The Board approved the draft WRMP24 prior to submission to the Secretary of State for Food, Environment and Rural Affairs.

Supporting Statement

1.114 The Board has engaged, overseen and scrutinised all stages of development of the plan through completion of the following:

- Setting the company's strategy and leading the development of our Business Plan and the Water Resources Management Plan.
- Regular review sessions with Board members at key stages in the development of the WRMP24 alongside engagement with the Executive Management Team.

