



Thames Water Draft Water Resources Management Plan 2024

Statement of Response

Appendix G1 Addendum:
Response to representations from
organisations

December 2023



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Section 1

Introduction

- 1.1 Appendix G contains the representations received from stakeholder organisations, along with our consideration of these representations and changes to the draft plan in response, or if no changes have been made we set out the reasons for this.
- 1.2 Appendix G comprises two parts – G1 and G2.
- 1.3 Appendix G1 includes the majority of representations received from stakeholder organisations.
- 1.4 Following a review of representations received a small number were identified as not responded to. The table in Section 2 includes representations that were missed and our consideration of these.
- 1.5 Appendix G2 includes representations from stakeholder organisations that were longer and/or included detailed technical content. The following organisational representations are included in Appendix G2 – Chalk Streams First, Greater London Authority, Group Against Reservoir Development, Oxfordshire County Council, Vale of White Horse District Council.
- 1.6 The table in Section 2 includes representations received from stakeholder organisations. The table sets out: response ID, organisation name, stakeholder response, Thames Water’s consideration of the response, changes made to the draft plan and, if no changes, the reasons why not. We have extracted the specific points from every representation and provided a response. Any introductory and overview text is not included.
- 1.7 A small number of representations had previously been identified as the views of an individual, not the organisation they represent. The table below details these organisations and where our consideration can be found.

| Organisation Name | Response ID | Found in Appendix | Page number |
|----------------------------------------------------------------|-------------|-------------------|-------------|
| The Hanneys Flood Group | 804 | H | 55-62 |
| Hounslow Green Party | 4447 | H | 561-568 |
| Banbury Community Action Group | 5065 | H | 692-695 |
| Teddington Society | 5073 | H | 698-703 |
| Hogsmill Catchment Partnership | 2618 | I | 922-944 |
| Beverley Brook Flood and Coastal Innovative Resilience Project | 2713 | G1 | 97-111 |



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| Cotswold Canals Partnership Board | 2786 | G1 | 151-157 |
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1.8 If you have any questions on the responses, please email info@thames-wrmp.co.uk



Section 2

Table of issues raised and our consideration

| Response ID | Organisation name | Stakeholder response | TW consideration of the stakeholder response | Changes made to the plan/ If no changes, why not |
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| 8073 | UK Water Retailer Council | <p>UKWRC is the representative body for water retailers in the two UK water markets. It has 17 members who together serve around 98% of the non-household (NHH) supply points (i.e. customer connections) in England and Wales.</p> <p>The 1.2million customers in the NHH Market account for around 30% of all water delivered, i.e. around 3Bn litres/day. Three percent of those NHHs use around 70% of that (i.e. around 20% of all water consumed). NHHs therefore present a significant opportunity for water saving to meet the demand reduction target.</p> <p>As retailers we have previously engaged directly with wholesalers in advance of them developing their PR24 Business Plans and, through the National Water Resources Framework SSG, their Water Resource Management Plans.</p> <p>We are responding to Thames Water’s consultation specifically around 1) smart(er) metering and 2) water efficiency. Both of these are key issues to tackle not only to improve service levels to NHH customers, but also to deliver the priorities set out by Government prior to Market opening and in the recently issued ‘Environmental Improvement Plan. 2023’, confirming the 9% reduction in NHH demand by 2038.</p> | <p>Non-Household (commercial) water use The government recently introduced national water targets, of which a 9% reduction in business water demand is required by 2038. This new demand reduction target agenda will drive water efficiency across all business sectors, with water companies playing a key role. Thames Water is leading on smart metering rollout on business properties and water consumption data services for the UK. We have worked closely with stakeholders including MOSL (Market Operator Services Limited) and OFWAT. We have shared our insights with wholesalers and retailers and have fed into the metering committee to help build the UK NHH metering strategy. We are committed to rolling out smart meters to all of our NHH customers and have already installed smart meters to approximately 18%. We plan to proactively replace all meters (small, medium and large) for smart when they reach the end of their asset life and will reach around 75% smart meter penetration by the end of AMP8 (2029-30). Our programme aligns to Option 1 of MOSL's Strategic Panel UK Metering strategy to roll out smart AMI meters to all meter sizes. In addition to this, we launched our new Digital Data Dashboard and Service in 2022 - to allow Retailers and 3rd parties to access NHH smart meter data on a live dashboard. The dashboard includes real time data showing any meter with continuous flow, which can be used by retailers to contact the end user/business quickly to help reduce the impact of leakage or wastage and reduce water demand and high bills. We will continue to contact businesses direct as well as through</p> | <p>We have provided information in response to your comments, there are no changes as a result of your representation.</p> |



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| | | | <p>retailers to notify of any continuous flow alerts from our smart meter data, enabling businesses to self fix.</p> <p>Our plan includes continued delivery of Smarter Business Visits to help install water saving devices and reduce wastage (fixing leaky loos, urinals etc), and targeting based on smart meter data.</p> <p>We will clarify our NHH plans in the final WRMP up front to highlight the scale of our programme.</p> | |
| 8073 | UK Water Retailer Council | <p>Context</p> <p>At market opening, it was anticipated that competition between retailers would drive the provision of water efficiency support to NHH customers. This hasn't been the case. It is apparent that since market opening, there are neither sufficient incentives on customers to drive behaviour change and demand for water efficiency support from their retailers, nor are there sufficient incentives on retailers and wholesalers to provide it in the absence of customer demand. And even if there was demand, the lack of granularity of consumption data makes it difficult for NHH customers to assess potential benefits of water efficiency interventions or measure the benefit of any such intervention.</p> <p>To achieve the environmental target of 9% (245 MI/d) by 2038 will require a step change in data quality and availability in the market and potential changes to the regulatory framework.</p> <p>Currently, some NHH properties are still not metered and, according to information from MOSL, most (around 75%) NHH properties are fitted with legacy, i.e. 'dumb' meters. In addition there are around 179,000 'long-unread' meters, including almost 24,000 dating from pre-market opening. In total therefore almost 14% of the NHH meters have not had a meter reading entered onto CMOS for 12 months or more. Without the funding to overcome this significant data quality and availability impediment the ability to progress water efficiency and demand reduction in the NHH market will be constrained. The 2024 Water Resource Management Plans and PR24 business Plans, together, present the opportunity to address this legacy issue holding back the</p> | <p>For our revised draft WRMP, we are considering further reductions in NHH usage in order to hit the 9% reduction by 2038 outlined in the environmental improvement plan. We have planned for the majority of this gap to be filled with further NHH water efficiency activities (SBVs), supported by further engagement with retailers, NHH continuous flow fix targeting, and NHH tariffing.</p> <p>Our long unread and basic meters are both being targeted under our existing smart upgrade programme.</p> | Our demand management and leakage reduction proposals have been extended in our revised draft plan. |



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| | | market and resulting in the major cause of customer complaints. We note and support Ofwat’s inclusion in its PR24 Final Methodology that ‘In their WRMPs and business plans we expect companies to consider smart meter solutions as the standard meter installation type. For English companies this is in accordance with the UK government expectations for water resources planning.’ Ofwat repeats this statement a number of times and qualifies this by referring to both residential and business customers. | | |
| 8073 | UK Water Retailer Council | Smart(er) metering We note and welcome the company’s ‘Progressive Smart Upgrade Programme - NonHousehold’ that includes the installation of around 120,000 smart meters on NHH properties by 2035, with around 51,000 within AMP8. We also welcome the company’s commitment to fairer and accurate billing that smart metering brings – a key issue for the NHH Market. We note though that the Best Value Plan states the company will finish the programme of smart meter upgrades in the 2030s. However, that this will still leave around 67,000 nonhousehold ‘basic’ meters in operation. How does this fit with your Ambition 3 – smart meter all practicable connections by 2035? Will there be a subsequent plan to upgrade these meters? We are aware, from MOSL data, that there are around 27,500 larger meters (ie 25 -100mm) serving NHH customers. Will these be included in the AMP8 programme – or will the company’s efforts be focused on the smaller ‘household’ size meters? | At this time, we are considering a proportion of properties to be unmeterable (proven to not physically allow a meter installation). As such, we are not considering these as “practicable” connections as per our ambitions, and do not currently have plans specific to them. For both our draft and revised draft plans, we were considering replacing basic meters based on asset life – so older meters were replaced quicker. This did have the effect that larger meters were by majority being replaced in AMP9. However, we have been reconsidering our non-household smart upgrade programme rollout, with current plans in place to accelerate all NHH smart upgrades into AMP8. | We have provided information in response to your comments, there are no changes as a result of your representation. |
| 8073 | UK Water Retailer Council | Water efficiency We support your proposal that smart(er) metering data will be the foundation of your demand management strategy and will from the basis of your continuing Smarter Business Visits from WRMP19. Clearly there will need to be liaison and engagement with the relevant retailers in the planning and delivery of these visits and any interventions made. | Outlines for the digital engagement tool are discussed in our WRMP section 8, however this is marketed primarily towards household water savings. For our revised draft WRMP, we are planning to extend specific tariffs to encourage water efficiency to NHH after 2040. These will likely be influenced by trials on HH properties. | Our NHH water efficiency programme has been extended in our revised draft plan. |



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| | | <p>The Plan refers to development of a digital engagement portal to allow customers to log on and access their smart meter data, enabling them to see water consumption and cost throughout each day. As retailers have the relationship with the NHH customer we would be interested in understanding how this will interface with retailers and how the company will work in collaboration with retailers to promote water efficiency and deliver the demand management savings set out in the Plan.</p> <p>The Plan also suggests the introduction of specific tariffs to encourage water efficiency.</p> <p>Although not planned until 2035, does the company envisage extending these to NHH tariffs?</p> <p>The Plan proposes that most of the NHH savings are delivered between 2025 and 2030 when you will work with businesses to reduce their consumption by 24Ml/d. It is significant to note this exceeds your expectation for savings from your HH customer base over the same period (17.6Ml/d). Retailers look forward therefore to collaborating with Thames Water in delivering this programme.</p> <p>Finally we note that the draft WRMP24 water efficiency activity represents a reduction in NHH consumption of 6%, i.e. a significant progression to the Government's target of 9% by 2038.</p> | <p>For our revised draft WRMP, we are considering further reductions in NHH usage in order to hit the 9% reduction by 2038 outlined in the environmental improvement plan. This includes for further engagement with retailers.</p> | |
| 8073 | UK Water Retailer Council | <p>Looking ahead to Final WRMPs</p> <p>We believe all water companies should include in their Final WRMPs:</p> <ol style="list-style-type: none"> 1. When referring to customers, defining whether household or non-household 2. Confirmation that NHH customers will be included in <ul style="list-style-type: none"> • The company's rollout of smarter meter installation programmes • The delivery of water efficiency advice and measures. <p>In both cases companies should set out their plans and how they propose to engage and collaborate with retailers and NHH customers.</p> <ol style="list-style-type: none"> 3. Confirm the number of smart(er) meters they intend to rollout during AMP8, | <p>In our rdWRMP we plan to upgrade around 60,000 non household basic meters with smart meters by 2030, and a further 59,000 to meet our ambition to smart meter all practicable connections by 2035. Smarter Business Visits which include a free visit by our qualified plumbers to install water saving devices, fix leaking taps, toilets, showers and install controls to previously uncontrolled urinals in non-households. Our rdWRMP also includes demand reduction from further non household initiatives, continuous flow targeting, non household tariffs in AMP10 and retailer activity.</p> <p>We plan to continue our rollout of smart meters for new customers and smart meter replacements of basic meters to meet our ambition to</p> | <p>Our NHH water efficiency programme has been extended in our revised draft plan.</p> |



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| | | <p>broken down by HH – NHH and by AMR – AMI.</p> <p>4. Demonstrate how they have taken account of evidence from the existing research work on smart(er) metering already in the Market, commissioned by MOSL, and the trials already carried out by other water companies</p> | <p>smart meter all household and non household customers by 2035. More detail about our plans for metering can be found in Revised Draft WRMP24 Section 8 – Demand Options and in the rdWRMP data table 2c Meter Installations (including meter upgrades) - Final Planning. Following MOSL’s Interim National Metering Strategy for the Non-Household Market guidance to ‘ensure all medium and large meters and smart or smart-enables by the end of AMP8’ we have decided to bring forward the upgrade of non household meters from AMP9 into AMP8 with the goal of smart metering all non household customers by 2030. This is described in section 8.28 of Revised Draft WRMP24 Section 8 – Demand Options and also in our WRMP demand reduction enhancement case, section 2.6. This updated plan includes the installation of 109,000 non household progressive meter upgrades by 2030, earlier than our ambition to smart meter all practicable connections by 2035. Our PR24 WRMP demand reduction enhancement case contains our up to date non household meter installation plan https://www.thameswater.co.uk/media-library/home/about-us/regulation/our-five-year-plan/pr24-2023/wrmp-demand-reduction.pdf.</p> | |
| 8225 | Beverley Brook Catchment Partnership | <p>1. Improving the Environment</p> <p>We recognise the importance of reductions in abstraction when exacerbating summer lowflows and support the most ambitious of these targets. Particularly in the face of hydrological change. We encourage reductions in abstraction where they have a negative environmental impact and affect Environmental Flow Indicator targets and prevent “Good Ecological Status” under the WFD</p> | <p>Thank you for your response. The plan we have is to implement these reductions to address summer low flows and meet the EFI where the science confirms that this will result in benefits to the flows and ecology</p> | <p>We have provided information in response to your comments, there are no changes as a result of your representation.</p> |
| 8225 | Beverley Brook Catchment Partnership | <p>2. Working Towards the National Target for Water Use</p> <p>□ Approach to leakage seems to lack ambition, missing Governments target of 50% reduction by 2050. Thames Water’s aim of helping people to reduce their water usage to 123 litres per person per day (from 141 currently) also lacks ambition. Other companies in the south east aim to meet the government’s target of 110 litres.</p> | <p>Thank you for your response. With regards to leakage, we’re investing significantly to tackle the amount of water that is lost from our water pipes. We remain committed to reducing total leakage by 20% by 2025, and in our draft plan we have committed to halve the amount of water we lose through leaks by 2050. This is a challenging and</p> | <p>The commitment to support customers to reduce demand has been extended to achieve the national target of 110 litres per</p> |



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| | | | <p>ambitious target and will require innovative approaches and significant investment.</p> <p>Household water use and the national target Between draft and final plans the government have confirmed that the national target for per capita consumption of 110 litres per day should be applied at company-level. As such our revised draft plan will hit this target. Our revised plan will clearly outline how our water company-led interventions such as smart metering, water efficiency and customer engagement will contribute to the overall 110 target agenda, plus outline how Government policy, future regulation and wider non-water-company action is required to meet the target.</p> <p>Please also note that the household usage target of 110 l/h/d does not include leakage values, property and distribution pipework leakage are both removed prior to this figure. This is purely a measure of household customer use.</p> | <p>person per day by 2050. Please see section 8 of the revised draft WRMP.</p> |
| 8225 | Beverley Brook Catchment Partnership | <p>3. Reducing Demand for Water</p> <p>□ Metering could be accelerated and meter/non-meter cost incentives passed onto the customer. Given the strong evidence of the benefits of smart metering, Thames Water should be challenged to fast track their roll out and achieve near 100% coverage by 2030.</p> <p>□ Thames Water’s aim of helping people to reduce their water usage to 123 litres per person per day (from 141 currently) also lacks ambition. Other companies in the south east aim to meet the government’s target of 110 litres.</p> <p>□ Promotion of water saving behaviour, such as subsidising domestic and business rain-water harvesting could be a measure to encourage.</p> | <p>Metering targeting</p> <p>Thames Water is implementing a Government-approved compulsory meter installation programme. Similar metering programmes are happening in other water supply regions. We took an industry lead role in opting for smart water meters to increase the leakage and usage reduction benefit. Our installation of smart meters in homes and businesses is already delivering a measurable reduction in usage and water loss across household and business customers, but there is more to do and our plan sets out the completion of the smart metering programme. Already, the vast majority of commercial customers on our network are set up with meters with 18% currently smart metered, increasing to 75% by 2030. Total commercial meter penetration is approx. 90%. By 2034/35, over 80% of the households on our network will be metered, and by 2039/40 this will increase to over 90%.</p> <p>Due to the complexity of older and converted buildings in London and Thames Valley, there will be a small component that will be deemed</p> | <p>The commitment to support customers to reduce demand has been extended to achieve the national target of 110 litres per person per day by 2050. Please see section 8 of the revised draft WRMP.</p> |



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| | | | <p>unmeterable, however the water use on these sites will be monitored through non-revenue bulk meters.</p> <p>Household water use and the national target Between draft and final plans the government have confirmed that the national target for per capita consumption of 110 litres per day should be applied at company-level. As such our revised draft plan will hit this target. Our revised plan will clearly outline how our water company-led interventions such as smart metering, water efficiency and customer engagement will contribute to the overall 110 target agenda, plus outline how Government policy, future regulation and wider non-water-company action is required to meet the target. Please also note that the household usage target of 110 l/h/d does not include leakage values, property and distribution pipework leakage are both removed prior to this figure. This is purely a measure of household customer use.</p> <p>Education and campaigns to promote water efficiency Both small-scale (smarter home/business visits) and large-scale (advertising campaigns) educational campaigns are being considered for the future. These have been considered within our demand management programme, with the former utilising smarter home and business visits to educate customers on water efficiency and prevention of wastage. For the latter, media campaigns are considered as part of our wider household innovation. "Intensive area based media campaigns are designed to raise awareness about water resources and water efficiency solutions in specific locations throughout our supply area. In dWRMP24, we revisit these campaigns to provide more focus to link water savings with environmental value and protection in the local area and include the promotion of local activities to help save water.</p> | |



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| | | | <p>Media campaigns in the shorter term will raise awareness of all Water Efficiency activity and assist to increase the take up of our specific water saving initiatives."</p> <p>Grey water reuse and rainwater collection Rainwater harvesting has been considered as a demand reducing measure. We have previously offered water butts for garden usage and continue to promote rainwater capture within our multi-channel customer engagement activity. Scaling up, the difficulty is that retrofitting either rainwater and/or greywater system technologies into existing properties is extremely challenging and the fittings are not readily market available. We believe there are better opportunities to increase water use systems into new developments, particularly large ones, at the design stage. We have recently launched an industry first Environmental Incentive for developers, offering financial incentives to embed water efficiency fittings, water reuse technologies (RWH/GWR) and deliver 'water neutrality' for any new housing development in our supply area. This incentive model is being promoted to developers, planning authorities and regulators. We have also worked closely with Defra and other government areas, on efforts to strengthen future Building Regulations, so that water reuse technologies and requirements become business as usual.</p> | |
| 8225 | Beverley Brook Catchment Partnership | <p>4. Size of Proposed Reservoir □ In general measures to save water, especially high in catchments, during times of plenty for use when scarce is desirable, and capacity should thus be maximised within the constraints imposed by physical conditions, community considerations and cost</p> | <p>For the revised draft WRMP24 we have further examined the range of possible future scenarios and have considered the wide range of risks that we may encounter in the future and given the range of risks which exist, have selected SESRO 150Mm3 in 2040 to provide security for the regions supplies.</p> | <p>We have provided information in response to your comments, there are no changes as a result of your representation.</p> |



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| 8225 | Beverley Brook Catchment Partnership | <p>5. New Water Sources</p> <p>□ It is great that Thames Water plans to develop new sources of water sooner rather than later to support environmental improvements across the south east. However, the environmental impact of the Teddington abstraction scheme remains a concern. This will release treated sewage into the river, raising the temperature and impacting water quality with negative consequences on the freshwater ecosystem and wildlife. Bringing forward the timetable for other options, including the proposed reservoir near Abingdon, is preferable.</p> <p>□ Cross-country water transfer schemes could have significant unintentional adverse impacts including: the transmission of invasive species; the introduction of water with a different catchment chemistry (which can affect ecology and can potentially affect the efficacy of wastewater treatment works); and the transfer of chemicals, with their concentration in rivers only recently coming to light as they are not removed by wastewater treatment systems. Focusing on improving the water resilience of water supply areas as well as very local water transfers is preferred.</p> | <p>The Teddington DRA scheme would be a drought resilience scheme and therefore only operational during periods of prolonged dry weather and when reservoir storage levels and river flows are below a set threshold, typically when a drought is predicted. As part of development of the scheme we have investigated the risks a scheme poses to the environment and for a scheme of the size proposed we predict a low risk of environmental effects. More work is required over the next couple of years to refine the assessments, design and mitigation for the scheme and the outputs of these ongoing studies will be made available and published on our website.</p> <p>The scheme design provides a sustainable way of utilising water better. Our initial assessments are set-out in our Gate 2 reports on our website (https://www.thameswater.co.uk/about-us/regulation/strategic-water-resource-solutions). The design of the scheme does not introduce saline water into the freshwater Thames and therefore there would be no change in salinity levels as a result of scheme operation. At certain times during operation the recycled water will be warmer than river water, although at other times it will be cooler. Our assessments show, as a worst case, a small increase in temperature of up to 1.5 degrees in the vicinity of the discharge in certain conditions. The scale of this increase does not impede the river from being improved or obtaining good ecological status under the Water Framework Directive, in fact the small temperature change predicted in certain conditions does not exceed the maximum river temperature measured in the River Thames during summer months. This temperature change and the size of the plume for the 75MI/d option fall within the existing guidance of the Environment Agency.</p> <p>The tertiary treatment process is still to be refined however, the processes captured in the design to date will be very effective at removing nutrients and organics. The discharge will need to comply</p> | <p>Teddington DRA is selected by WRSE as offering best value to customers and provides a viable new source of water during periods of drought. Work to date shows the scheme poses a low risk to the environment and river users and as such the scheme should remain one of our preferred schemes in our Water Resource Management Plan while further work is undertaken.</p> |



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| | | | <p>with limits set by the Environment Agency which would be based upon established Environmental Quality Standards. The discharge location is also within the last several hundred metres of the freshwater Thames minimising further the potential impacts. We have assessed the risk of significant ecological impacts from increases in temperature, nutrients and the development of toxic algae blooms and concluded a low risk. More work is required over the coming few years to develop the design, mitigation and complete full impact assessments and Thames Water will only be promote the scheme if we can be confident there would be no significant impacts on the river or wider environment.</p> <p>We are working closely with the Environment Agency, Natural England and the Drinking Water Inspectorate to understand the existing water quality of the River Thames. We currently sample monthly for over 350 different chemicals so that we are able to fully assess the proposed discharge against current legislation and also existing water quality chemicals that includes PFAS and other 'forever chemicals'. Work will continue in this area to build one of the most comprehensive water quality datasets for any stretch of the Thames that will allow full assessment in due course including assessment of in-combination effects with other schemes. We are committed to ensuring there would be no deterioration of water quality at Teddington as a result of the scheme.</p> <p>The draft WRMP plan selected Teddington Direct River Abstraction (2030), SESRO 100Mm3 (2040) and the Severn to Thames Transfer (2050). We set out in the draft WRMP24 Section 11 – The overall best value plan how a new reservoir is a better first option ahead of a transfer from the River Severn. For the revised draft WRMP24 we have further examined the range of possible future scenarios and have</p> | |



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| | | | <p>considered the wide range of risks that we may encounter in the future and given the range of risks which exist, have selected Teddington Direct River Abstraction in 2033 and SESRO 150Mm3 in 2040 to provide security for the regions supplies. The Severn to Thames Transfer (STT) is no longer required from 2050 due to the updated requirement in the Water Resources Planning Guidelines to reduce average per capita consumption (PCC) to 110 l/h/d by 2050. We will however continue to develop the STT as an adaptive option to mitigate the risks that SESRO could not be developed, or if government water efficiency policies do not reduce demand (or PCC) to the levels anticipated. Meeting the supply demand balance will require a wide range of options and large scale options alone will not be enough.</p> | |
| 8225 | Beverley Brook Catchment Partnership | <p>6. Best Value for Customers □ There is never a good time to increase the cost of essential goods onto customers, especially during a “cost of living crisis”. However, spending should be ambitious and a long-term view should be taken here to prevent larger increases in price in the future being passed onto the next AMP round/ other organisations at the cost of the environment.</p> | <p>Our water resources are under pressure and the purpose of our draft WRMP is to ensure we can continue to provide a secure and sustainable water supply to our customers over the next 50 years, whilst protecting the environment. We do need to plan ahead if we are to ensure a resilient water supply in the face of our changing climate and protect the environment.</p> <p>Our shareholders are underwriting a turnaround plan to prioritise investment in improving service for customers and to protect the environment that will see us invest £1 billion more in the network than we will receive from bills and this year they have committed £500m of new equity.</p> <p>The cost of the plan to customers is stated in the plan summary and Section 11 of the plan, presented as indicative bill impacts. These bill impacts are calculated by considering the investment which is needed (and when), and using financial modelling to determine the bill increases which would apply under the current regulatory regime.</p> | <p>We have provided information in response to your comments, there are no changes as a result of your representation.</p> |



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| 8225 | Beverley Brook Catchment Partnership | <p>7. Other Comments on Draft Plan</p> <p>□ Nature Based Solutions (NbS), Thames Water may be interested in receiving learnings from the Innovative Flood Resilience Project in the Beverley Brook based on improving water resilience so that Thames Water can meet their NbS goal of working to better understand the benefits of these options and support their development and delivery and the tandem flood/ water resilience/ water quality benefits these bring.</p> | <p>Thank you for your comments. As a business we are interested in hearing more about catchment based solutions that improve the resilience of the natural environments we operate within.</p> <p>While there exists a broad body of evidence regarding the feasibility of using nature-based solutions in flood mitigation, more limited evidence exists to suggest that nature-based solutions can 'hold water back' in catchments to the degree which would be required to offset drought risk. We have considered a range of catchment options across our supply area, and have ascertained those nature-based solutions which we can be confident will deliver supply benefits. In AMP8 we will consider nature-based solutions in more detail, as part of the Water Industry National Environment Programme (WINEP), with a particular focus on establishing where nature-based solutions may mitigate the environmental need for abstraction licence reductions.</p> <p>In addition, it is important to note that the Water Resources Management Plan is not the only area of Thames Water which is considering the adoption of nature-based solutions, with multiple workstreams across the company considering and funding them to solve different problems. Different workstreams considering nature-based solutions have different drivers, and we map catchment vulnerabilities to understand where interventions will have the biggest impact. Drivers include water quality, improving urban drainage, river restoration and community engagement and education. Many of these programmes have recently been expanded to cover more of our supply area, built on a solid foundation of working over a number of years with community stakeholders. We know that we have further work to do to integrate our view of drivers for and benefits of NBS, and this is something that we will continue to do in future planning cycles.</p> | <p>We have provided information in response to your comments, there are no changes as a result of your representation.</p> |

