



Revised 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), including 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, including the National Framework for Water Resources which was published in 2020 and strengthened planning at a regional level.
- The collaborative approach with the other water companies and stakeholders across the South East, through Water Resources South East (WRSE), to develop a plan for the South East region, which is the foundation for our WRMP.
- The relationship between the WRMP and other plans including the five-year business plan and local authority local plans, and with the strategic resource options (SROs).
- Engagement with our Board, regulators, stakeholders and our customers during the development of the draft South East regional plan and our draft WRMP24 and the public consultation held on our draft WRMP24.

The main changes we have made to this section between the draft and revised draft WRMP24 are:

- We have included updated government and regulatory policy requirements that we have taken into account in revising our draft WRMP24.
- We have included information on the public consultation undertaken on our draft WRMP24.
- We have included additional information on the work undertaken with customers to ensure we have understood their priorities and expectations and taken these into account in the revisions to the draft WRMP24.
- We have updated sections to reflect to ongoing engagement with our Board and the assurance undertaken on the WRMP24.

What is 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 an efficient and economical system of water supply which will provide security of supply for customers¹.
- 1.2 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.
- 1.3 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 proposed reduced abstraction. (Section 5)
 - The planning challenge, which for the South East regional plan and our WRMP24 looks 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 accommodate uncertainties in developing a long-term plan with a preferred, or reported, programme of investment which represents the “most likely” future including both demand and supply options, to deliver resilient, sustainable water resources and provides best value to society and the environment. (Sections 10 and 11)
- 1.4 We have complied with legal requirements and followed regulatory guidance including the Water Resources Planning Guideline (WRPG)³ in developing the draft WRMP24 and in the revisions to the draft WRMP24. The WRPG provides a clear framework for developing the plan focusing on the legal requirements and technical approaches that should be followed. We have been transparent in our methods, data, assumptions and decisions.
- 1.5 We have also considered government’s policy expectations⁴ in developing the 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
 - Consideration of the environment and society in decision making

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, Water Resources Planning Guideline: July 2022 and updated March 2023

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



- 1.6 Our plan 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.
- 1.7 The plan builds on our previous plan, WRMP19, published in March 2020 and reflects the South East best value regional plan.
- 1.8 We have worked openly with regulators and stakeholders through the development of the South East regional plan and our WRMP24, 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 priorities and preferences.
- 1.9 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

- 1.10 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.
- 1.11 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.
- 1.12 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.
- 1.13 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.
- 1.14 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.
- 1.15 A more detailed map of each WRZ along with a high level description of each zone can be found in Appendix A: Water resource zone integrity.
- 1.16 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.

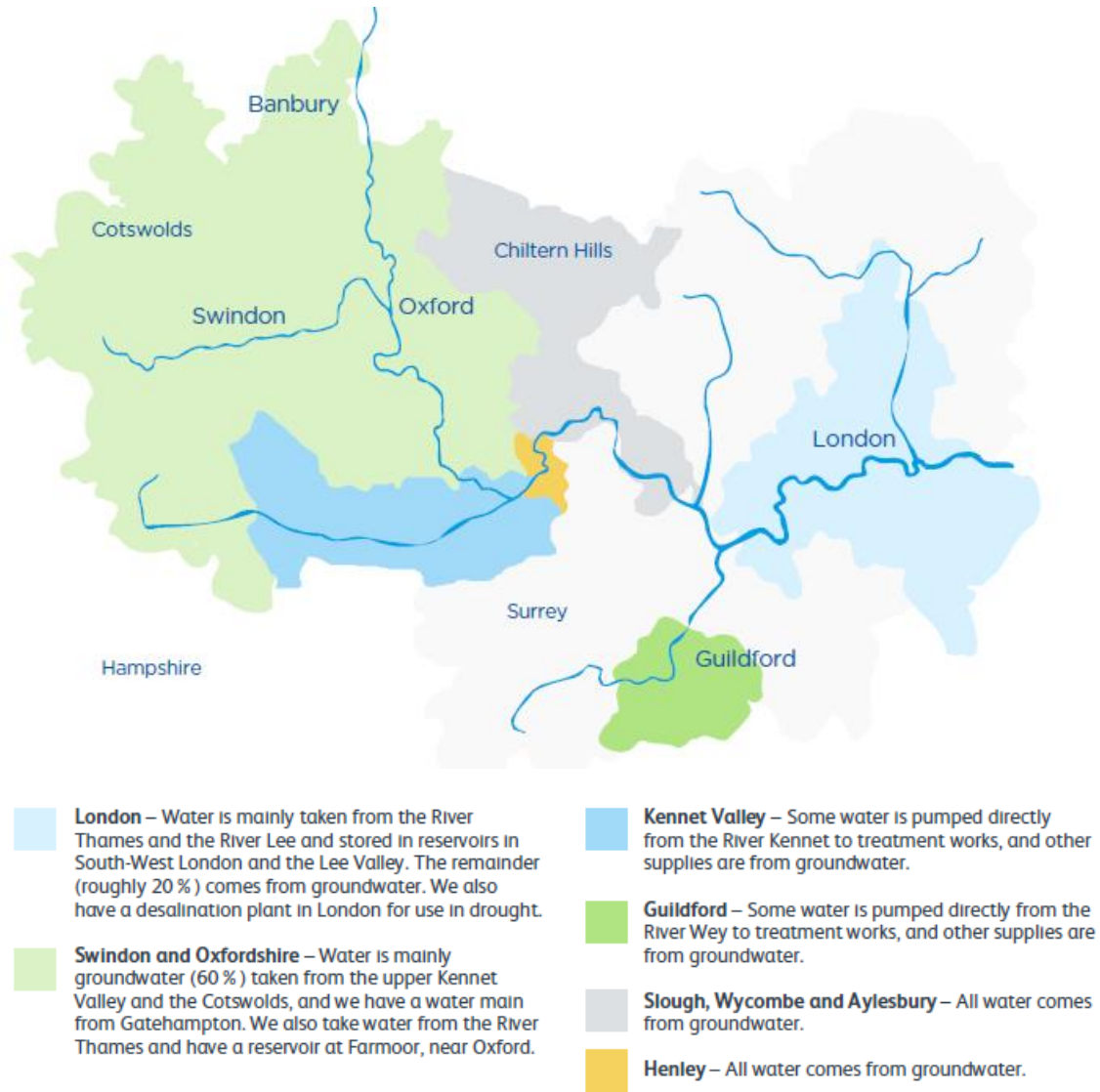


Figure 1-1: Thames Water supply area and Water Resource Zones

Levels of service provided to our customers

- 1.17 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).
- 1.18 We have targets 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.
- 1.19 We have 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 particularly 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 were not a significant concern
 - 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
- 1.20 In 2021 we updated our Drought Plan in line with regulatory requirements. We worked with the other water companies across the South East as part of this work, and in accordance with WRSE's policy ambition statement⁹ we updated our Levels of Service for TUBs from 1 in 20 to 1 in 10 years on average to ensure consistent service levels across the South East region. We consulted on our draft Drought Plan.
- 1.21 Our Drought Plan¹⁰ 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, and the foundation of our WRMP24 are shown in Table 1-1.

⁸ WRMP19 Appendix T: Our customer priorities and preferences

⁹ WRSE policy ambition statement regarding Levels of Service in which WRSE water company members committed to work towards a common service level for Temporary Use Bans. The policy statement was consulted on in August 2020, and respondents were supportive of this policy ambition. TW updated our Levels of Service for Temporary Use Bans from 1 in 20 to 1 in 10 in our Drought Plan to be consistent, which in turn was subject to public consultation, and the change was reported in the 2022 Annual Review of our WRMP19.

¹⁰ Thames Water Drought Plan, August 2022

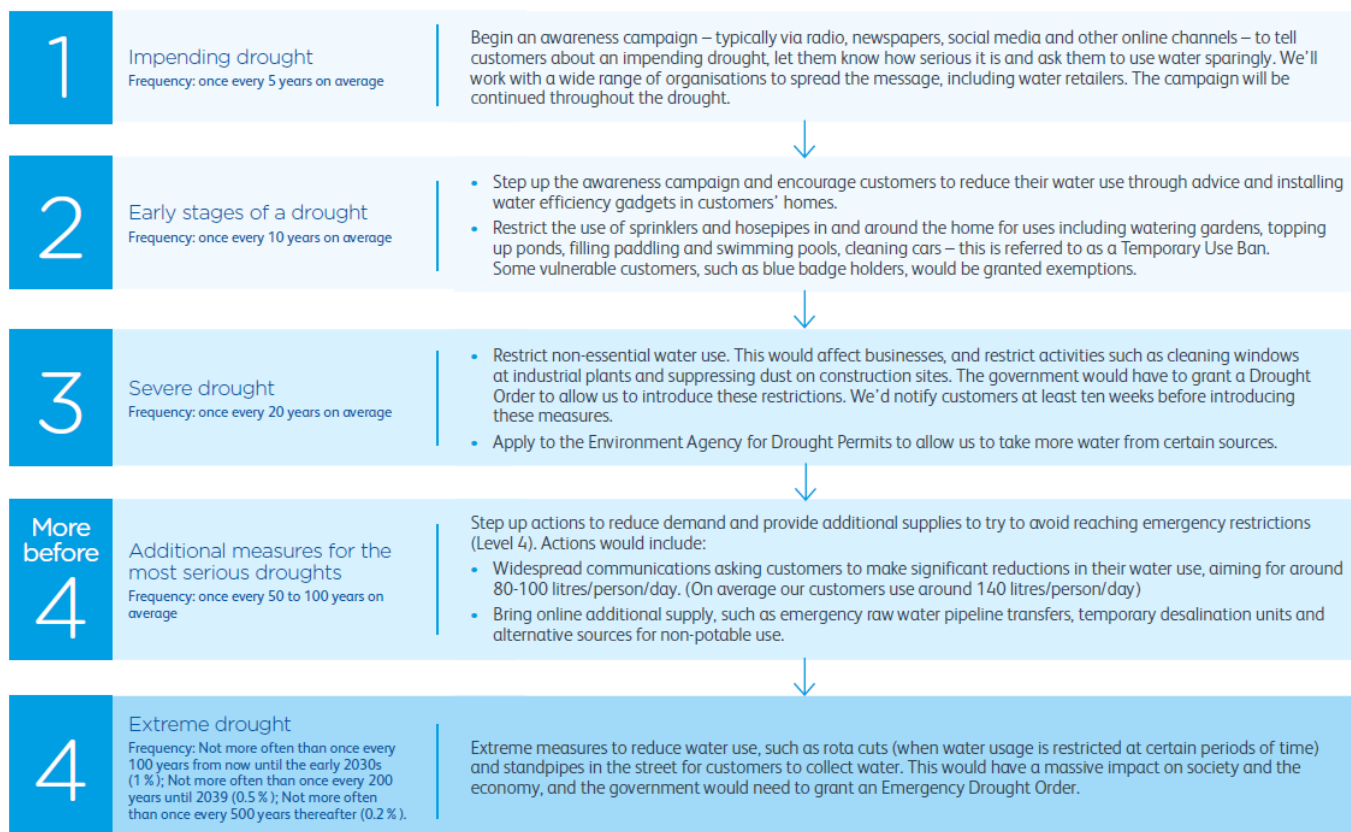


Table 1-1: Our levels of service and actions we'll take in a drought

1.22 Our 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 WRMP24.

Planning framework and policy context

- 1.23 The planning framework for water resources has changed significantly since our last plan, WRMP19, in recognition of the significant future challenges faced for water supply and the need to invest to ensure a secure and sustainable water supply for future generations, as well as protecting the environment.
- 1.24 In 2020 the Environment Agency published the National Framework for Water Resources¹¹. This built on the cross-sector work to develop a long-term planning framework¹² and the work completed by the National Infrastructure Commission (NIC)¹³, 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, called Strategic Resource Options (SROs) including transfers, reservoirs and water recycling.
- 1.25 The National Framework is the backdrop to the development of the draft South East regional plan and our plan, and the main components are described in the following sections.

National Framework for Water Resources

- 1.26 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'.

¹¹ Environment Agency, National Framework for Water Resources, 2020

¹² WaterUK Long-term water resources planning framework, 2016

¹³ National Infrastructure Commission (NIC) Preparing for a Drier Future, 2018

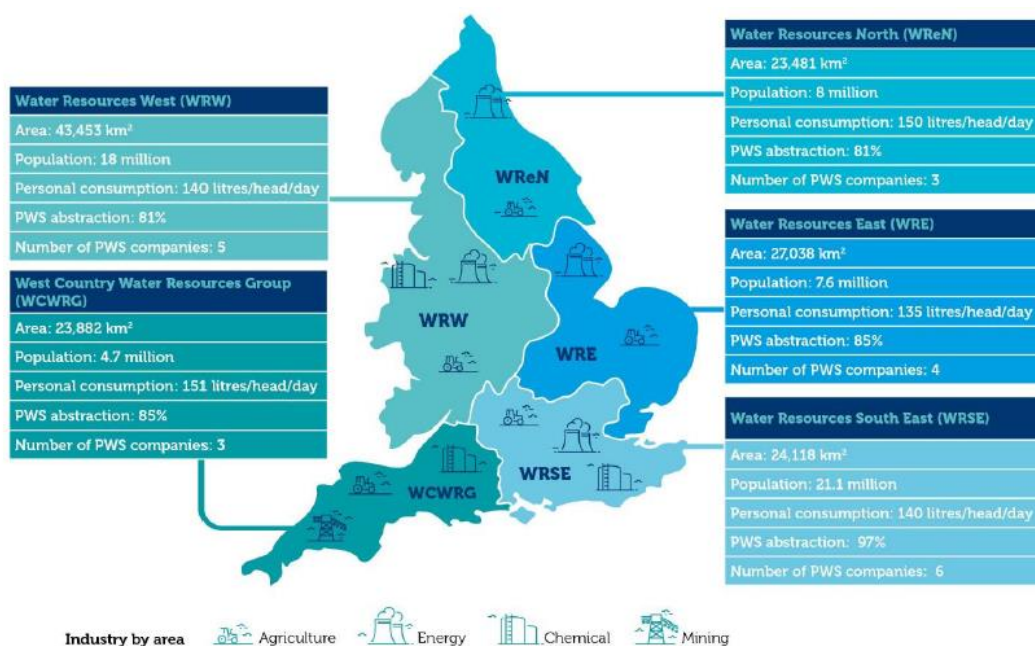


Figure 1-2: The regional water planning groups¹⁴

1.27 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

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

1.29 WRSE’s work on the 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

¹⁴ Overview of the water resources planning regional groups with key statistics and industries, taken from Summary of Regional Plans for Water Resources, published by the National Framework, November 2022

- 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 regional plan
 - WRSE established stakeholder groups to share information and approaches at formative stages and to seek input and comments
 - WRSE also engaged extensively with the wider stakeholder community through consultations, webinars and meetings
- 1.30 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.
- 1.31 WRSE published its emerging regional plan¹⁵ in January 2022 for public consultation. The emerging plan was primarily a least cost plan. It set out how it planned to achieve a secure, resilient and sustainable supply of water for 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 received over 1,150 responses to the consultation and published a response¹⁶ to the feedback in May 2022 drawing out the main themes. Following the consultation WRSE continued work to develop the draft best value plan for the region and in November 2022 published the draft regional plan for consultation. The consultation on the draft regional plan was open for 14 weeks, it was a non-statutory consultation and WRSE committed to publish a response to the feedback received. The six South East water companies also prepared their draft WRMPs, which reflected the draft regional plan, and consulted on these over the winter of 2022/23. Each water company will produce and publish a formal statement of response to their consultation on their draft WRMP24.
- 1.32 Figure 1-3 illustrates the relationship between the regional plan, the South East water companies' WRMPs and the Business Plans.

¹⁵ WRSE Emerging Regional Plan, January 2022

¹⁶ WRSE Emerging Regional Plan, Consultation Response Document, May 2022

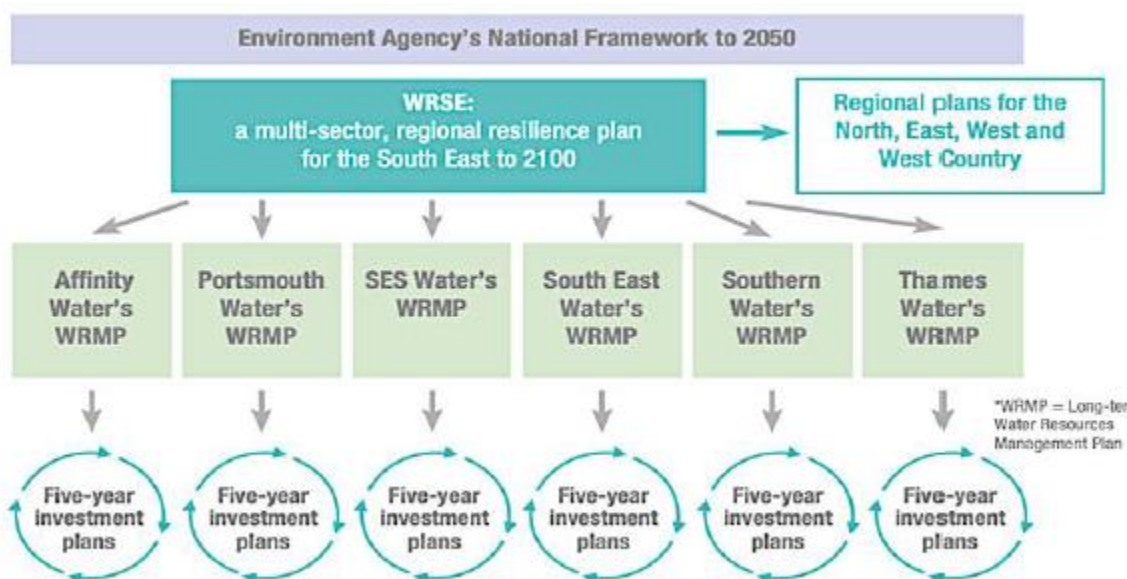


Figure 1-3: Relationship between the South East regional plan and water company plans

Water Resources Planning Guideline (WRPG)

1.33 The WRPG and supplementary guidance notes, are produced by the Environment Agency, Ofwat and Natural Resources Wales and provide a framework to guide the preparation of WRMP24s. The documents 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 included a number of requirements including the requirement for water companies to set an environmental destination, plan for enhanced resilience to droughts of 1:500 years severity by 2040 and reduce leakage by at least 50% by 2050. The updated guideline, released in March 2023, included a new requirement for water companies to support the national ambition to reduce household water use to 110 litres per person per day by 2050.

1.34 We have referred to the WRPG in preparing the South East regional plan and our WRMP24 and discussed aspects of the guideline with regulators and stakeholders throughout the development of these plans.

The 25 Year Environment Plan, the Environment Act 2021 and the Environmental Improvement Plan 2023

1.35 In 2018 the Government published its 25-year plan for the environment 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 plan, and include:

- Setting a 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
- 1.36 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 set 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.
- 1.37 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.
- 1.38 The Environmental Improvement Plan (EIP)¹⁷ sets out how government intends to improve the environment, building on the vision set out in the 25 Year Environment Plan, with new powers and duties from the Environment Act and other relevant legislation. The EIP includes ten goals, one of which is to ensure clean and plentiful water with the following targets and commitments directly relevant to our WRMP24:
- Reduce the use of public water supply in England per head of population by 20% by March 2038, with interim targets of 9% by 31 March 2027 and 14% by March 2032 on the trajectory to achieving 110 l/h/d household water use and reduce non-household water use by 15% by 2050
 - Restore 75% of our water bodies to good ecological status.
 - Cut leaks by 50% by 2050 with interim targets to reduce leakage by 20% by March 2027 and 30% by March 2032
 - Target a level of resilience to drought so that emergency measures are needed only once in 500-years by 2040
 - The plan also sets out that Government will roll out new water efficiency labelling, deliver the actions in the *Roadmap to Water Efficiency* in new developments and protect chalk streams by supporting the Chalk Stream Strategy

Water Industry National Environment Programme (WINEP)

- 1.39 The 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.
- 1.40 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 interventions¹⁸.

¹⁷ Environmental Improvement Plan 2023 - First revision of the 25 Year Environment, Defra 2023

¹⁸ Defra, EA & Ofwat, Review of the water industry national environment programme – consultation document July 2021.

- 1.41 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 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.
- 1.42 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. To read more on this please go to Sections 2 and 5.

Water Framework Directive (WFD)

- 1.43 The WFD, and the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, set out environmental requirements and promote increased awareness of catchment processes and challenges. We are required to take account of the requirements of the WFD, and the environmental objectives in the River Basin Management Plans (RBMPs). This includes assessing current and future predicted abstractions to ensure compliance; screening options that have unacceptable environmental impacts that cannot be overcome; and catchment scale restoration measures. Sections 5 and 9 include further information. Section 9 and Appendix D provide further information on the WFD assessment specifically.

Strategic Environmental Assessment (SEA)

- 1.44 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.
- 1.45 WRSE undertook an SEA to identify where the South East regional plan 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 WRMP24. Section 9 and Appendix B provide further information on the SEA assessment specifically.

Habitats Regulation Assessment (HRA)

- 1.46 Habitats Regulation 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.
- 1.47 In developing our plan, we have considered the requirements of the Conservation of Habitats and Species Regulations 2017 and have undertaken a Habitats Regulation based assessment of our WRMP24 where there are likely significant effects on European designated sites. Section 9 and Appendix C provide further information on the HRA specifically.

Links with other plans

1.48 The WRMP24 is closely related to a number of other plans and strategies. In the section we set out the relationship with other plans.

Business Plan

1.49 Water companies are required to produce a business plan every five years which sets out the services to be provided to customers and improvements we will deliver for the environment. Funding for the business plan is secured through Ofwat's, our economic regulator, Price Review (PR) process. Ofwat publish regulatory guidance and methodology documents that prescribe the process.

1.50 Ofwat¹⁹ has set out four key ambitions for this Price Review (PR24):

- Focus on the long-term
- Deliver greater environmental and social value
- Reflect a clearer understanding of customers and communities
- Drive improvements through efficiency and innovation

1.51 Furthermore Ofwat has asked²⁰ 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.

1.52 Ofwat want innovative and ambitious plans and intend to set stretching performance targets to incentivise companies to deliver excellent customer service, protect and enhance the environment, and to maintain and improve the health of assets.

1.53 The WRMP24 is an integral component of the business plan, with the early phase of the WRMP24 included in the business plan to secure the necessary funding. Whilst funding is essential to deliver the services our customers want and expect, the WRMP24 also closely aligns with the ambitions and the adaptive planning approach promoted by Ofwat. We have developed a best value adaptive plan, in collaboration with the wider South East, looking ahead to 2075. The plan is built on insight from our customers and communities and includes some extremely stretching targets such as leakage reduction and the efficient use of water, and we will need to look for innovative approaches to successfully deliver these.

1.54 In October 2023 we'll submit our WRMP24 data tables to Ofwat as part of the business plan and we'll hear the outcome of our proposals for WRMP24 interventions as part of the PR24 and will then confirm our plan for the period 2025 to 2030.

Drought Plan

1.55 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.

¹⁹ Ofwat Our final methodology for PR24, December 2022

²⁰ Ofwat, PR24 and beyond: Final guidance on long-term delivery strategies, April 2022

- 1.56 Our WRMP is closely related to our DP²¹. 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.
- 1.57 We updated our DP in 2021 in accordance with the Drought Plan Guideline²² and consulted on it. Our updated DP was approved by the Secretary of State in August 2022.
- 1.58 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, the operation of the North London boreholes in July and the introduction of a TUB across London and the Thames Valley on 24 August 2022.
- 1.59 We have reviewed the experiences during the 2022 drought and incorporated learning from the event into our long-term planning including the availability of water in the Lower River Thames to refill the reservoirs in west London and the assumptions around the amount of water that can be saved from water use restrictions such as TUBs. This is presented in Technical Appendix CC.

Strategic Resource Options (SROs) and RAPID

- 1.60 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 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.
- 1.61 Ofwat made funding available to a range of water companies to progress investigative work on the 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.
- 1.62 The delivery of SROs is subject to a separate 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
- 1.63 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.
- 1.64 At gate one (July 2021 - for the SROs that TW is involved with), 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

²¹ Thames Water Drought Plan, August 2022.

²² Environment Agency, Water Company Drought Plan Guideline, April 2020.

unsuitable, no longer require further development funding or will not benefit from the structured gate process.

- 1.65 At gate two (November 2022 - for the SROs that TW is involved with), 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.
- 1.66 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 were submitted to RAPID on 14 November 2022 and published on our website www.thameswater.co.uk/sros. RAPID published its draft decision on each SRO, held a period for representations on its draft decision and published its final decision at the end of June 2023.
- 1.67 The SROs have been considered alongside other options in the development of the regional plans and WRMPs.

River Basin Management Plans (RBMP)

- 1.68 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. Appendices B (SEA) and D (WFD) 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.
- 1.69 Our WRMP24 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. These are illustrated in Figure 1-4.



Figure 1-4: Activities to encourage the efficient use of water – social media communications

- 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
- 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 WRMP24, 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 Plan (DWMP)

1.70 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. We collaborated with over 2,000 customers and stakeholders to develop the draft DWMP, consulted on it during summer 2022 and published our updated DWMP in May 2023. Figure 1-5 shows the plan and the cycle we followed to prepare the plan.

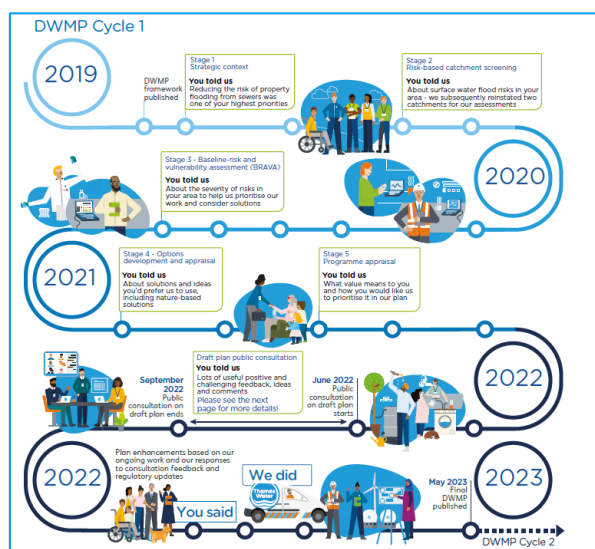


Figure 1-5: Snapshots from our DWMP

- 1.71 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
- 1.72 Appendix Y presents the work we have completed to align the plans and facilitate a coordinated approach.
- 1.73 A summary of the solutions proposed in the DWMP will help to ensure the efficient use of water, better management of water in the catchment and improvements to water quality, as shown in Figure 1-6, which are beneficial for long-term water supply.

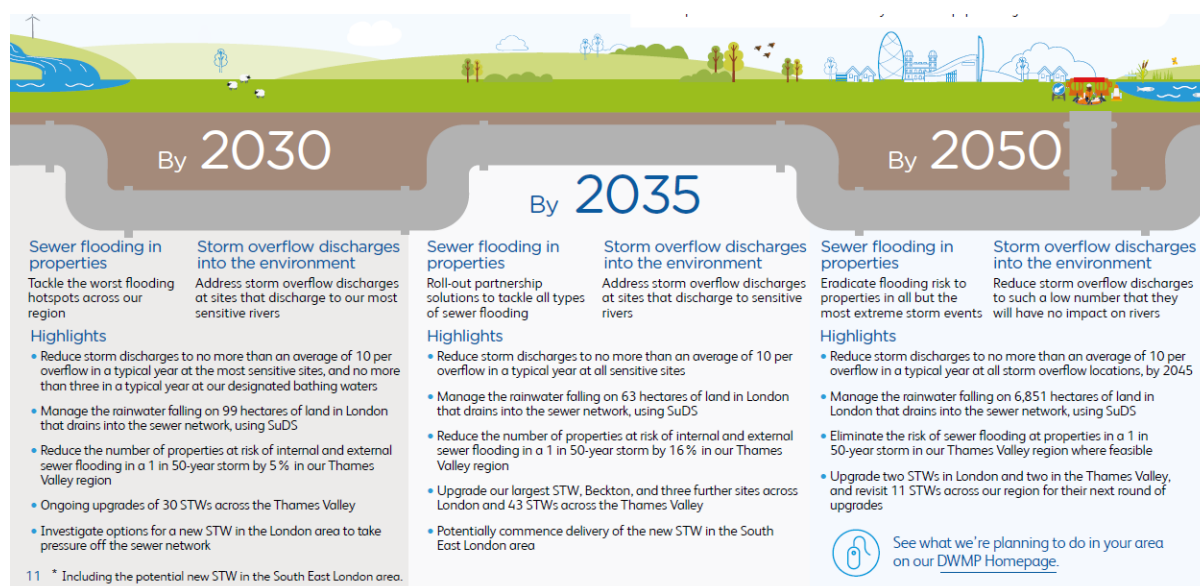


Figure 1-6: A summary of the main commitments in our DWMP

Drinking water quality and safety plans

- 1.74 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 guidance²³.
- 1.75 We have also worked with our drinking water safety plan (DWSP) team in developing our plan. 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 SROs. We engaged with DWI as part of these assessments. This information is presented in the SRO gate 2 reports.

Local Authority plans

- 1.76 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. Working with WRSE we contacted the local authorities across the SE, including the 95 local authorities in our supply area, to collate data from their local plans to forecast future growth. For this revised

²³ DWI Guidance Note: Long-term planning for the quality of drinking water supplies, July 2022



draft plan we updated these forecasts. Based on their plans, we estimate that the number of customers in our area will grow by close to two million people to over 12 million by 2050. Our WRMP24 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. To read more please go to Section 3.

Local Nature Recovery Strategies

- 1.77 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 the management regimes of grassland and creating new habitats including wetlands, woodlands and hedgerows. For the WRMP24 specifically, we are aiming to achieve a net 10% biodiversity gain across our plan. To read more please go to Section 2.

Engagement with regulators, stakeholders and our customers

- 1.78 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 South East regional plan and our WRMP24.
- 1.79 The regional plan is the foundation for the South East water companies' WRMP24s 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.
- 1.80 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.
- 1.81 As well as the engagement through the development of the regional plan, we also undertook pre-consultation activity with regulators and stakeholders to inform our draft WRMP24, and consultation on our draft WRMP24.
- 1.82 This section sets out the engagement undertaken with regulators, stakeholders and customers on the South East regional plan and our WRMP24, with more detailed information presented in Appendices S and T for stakeholder and customer engagement respectively.

Working with WRSE

- 1.83 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
- 1.84 The framework is shown in Figure 1-7.

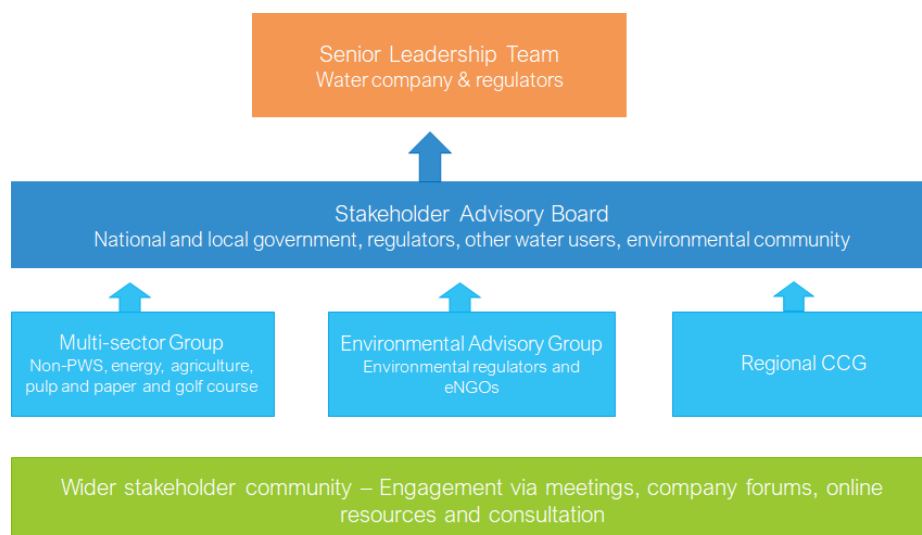


Figure 1-7: WRSE Stakeholder Engagement Framework

1.85 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
- 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

1.86 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 challenge²⁴; resilience framework²⁵; the policies²⁶; and method statements²⁷ 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

²⁴ Future Water Resource Requirements consultation, March 2020

²⁵ Resilience Framework consultation, June 2020

²⁶ Regional policies, August 2020

²⁷ Method Statements, overview webinar followed by topic specific webinars and consultation, August - October 2020

Develop – During 2021 WRSE shared information on feasible solutions²⁸, including the SROs, consulted on the objectives, criteria and metrics²⁹ to determine the best value regional plan and explained the adaptive planning approach³⁰

1.87 An overview of the engagement activity completed through to summer 2021 is presented in Figure 1-8.



Figure 1-8: 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 1-9. In May 2022 WRSE published its response³¹ 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

²⁸ Option webinars to showcase the range of options under consideration and provide an opportunity to discuss and comment on the options, May - June 2021

²⁹ Best Value Plan objectives, criteria, and metrics webinar and consultation, February 2021

³⁰ Webinar on adaptive planning to share WRSE’s approach to develop an adaptive plan, June 2021

³¹ 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>

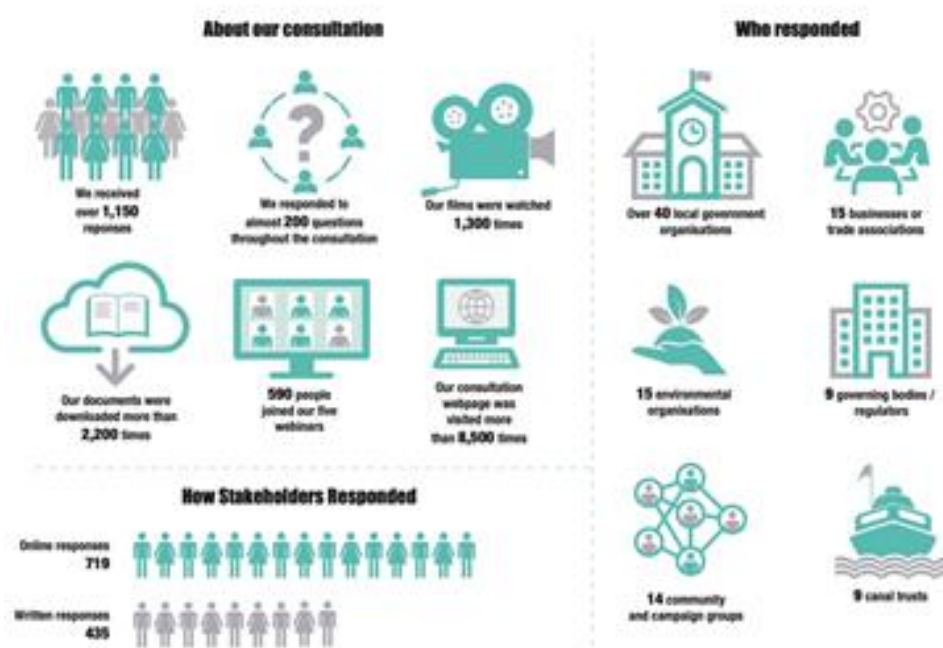


Figure 1-9: Consultation on the WRSE Emerging Plan

1.88 WRSE has published a detailed report³² on the programme of engagement undertaken to inform the development of the regional plan.

Company-led pre-consultation engagement on our draft WRMP24

1.89 In addition to the regional-led work we also engaged 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 was 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 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 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

³² WRSE, Stakeholder Engagement report, January 2022 <https://www.wrse.org.uk/media/0f514ug4/stakeholder-engagement-report-january-2022.pdf>

(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 meeting³³ 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 joint approach was designed in recognition of the large number of common stakeholders. 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 articles in our Environmental Newsletter which is 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 WRMP24 with specific focus on the governance, open and transparent working approach and decision making and wider engagement
- 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

³³ Thames Water & DWI WRMP24 pre-consultation meeting, August 2022

- 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 winter 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

1.90 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.

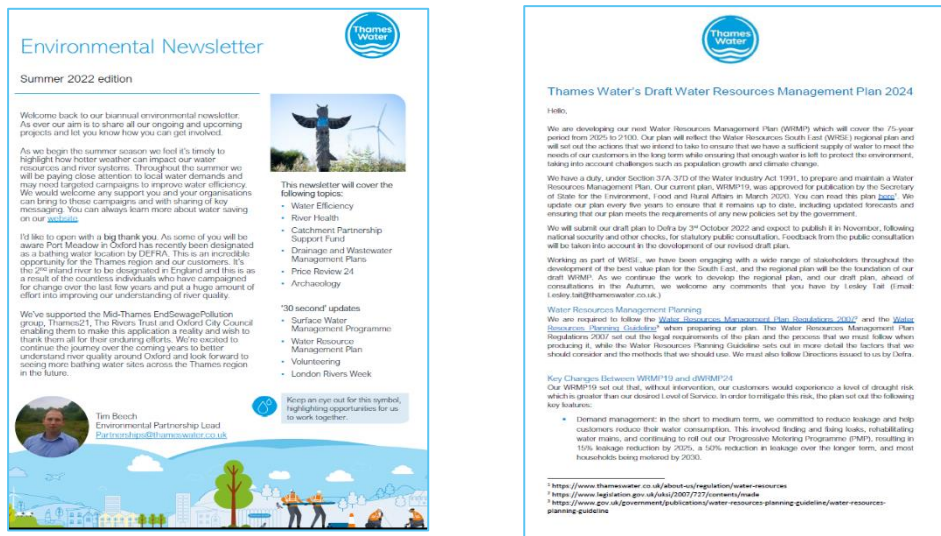


Figure 1-10: Environmental Newsletter and pre-consultation letter



Understanding our customers' priorities and preferences

- 1.92 Engagement with customers has been an important part of developing our WRMP24. The regulatory framework³⁴ 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 our future plans to ensure we deliver value to our customers over the long-term.
- 1.93 The engagement has included regional, company and scheme specific work. Thames Water has consolidated the findings of research and engagement and produced a reference document, What Customers, Communities and Stakeholders Want (WCCSW)³⁵, that provides a consistent and robust evidence base for decision making. This document is a live document and is regularly updated with further engagement and additional insights, to keep our understanding current and reflective of societal changes.
- 1.94 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, and engaged with TW's CCG on some aspects of our work.
- 1.95 A summary of the main messages in relation to long-term water resources planning and the specific research studies undertaken including the scope, how the insight has been used to inform the development of the WRMP24 to date and ensure the successful implementation of the plan, is presented below, with further information presented in Appendix T.
- 1.96 Here is a summary of feedback from our customers' on their preferences and priorities.
- Our customers want a service “that just works” today and in the future; provided at an affordable price and in an environmentally friendly way; by a company that always has good customer service; and which gives something back to the society and communities it touches. This is presented visually in Figure 1-11.

³⁴ PR24 and beyond: Final guidance on long-term delivery strategies,

³⁵ What Customers, Communities and Stakeholders Want – A summary of our customer community and stakeholder insights, Version 17, March 2023



What customers, communities and stakeholders want

The current view of what customers, communities and stakeholders want can be broken down into 10 Wants.

Service that 'just works' today and in the future... provided at an **affordable price** and in an **environmentally responsible way**... by a company that always has **good customer service**... which gives something back to the society and communities it touches.

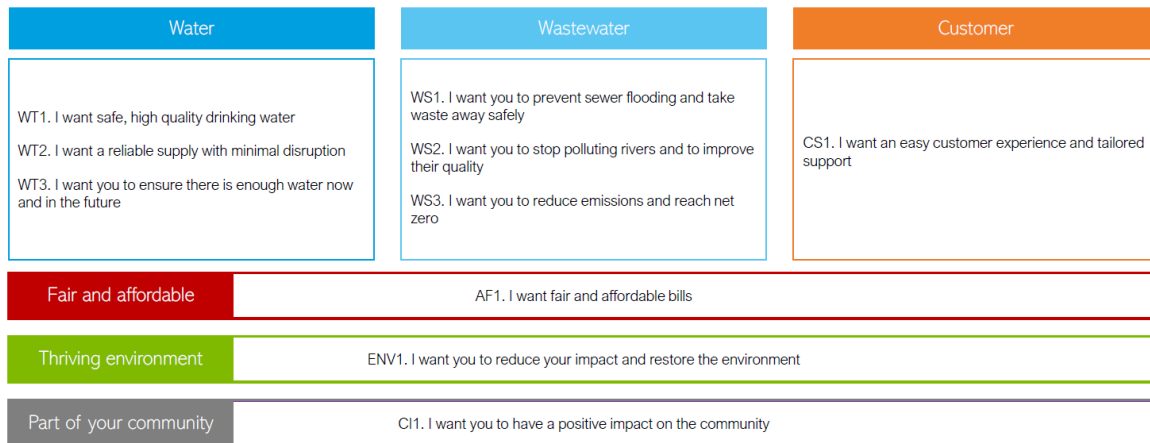


Figure 1-11: What customers, communities and stakeholders want (WCCSW)

1.97 Specifically in relation to water, customers have told us that they want:

- WT1. I want safe, high quality drinking water
- WT2. I want a reliable supply with minimal disruption
- WT3. I want you to ensure there is enough water now and in the future

1.98 Specifically in relation to water resources, our customers main points of feedback are described below:

- most customers are unaware of the challenges faced for future water supply. When they are informed, customers expect us to plan for a resilient water supply now and in the long-term.
- customers support the collaborative approach to developing a plan for future water supply across the South East.
- customers believe that improved water supply resilience should not be at the expense of the environment. Overall customers support proposals to improve the environmental impact of water abstraction beyond current statutory requirements, however there are concerns about the cost. On the draft WRMP24 customers supported the environmental ambition with the opportunity to adapt and take account of evidence and data as further studies are undertaken.
- customers support a balanced plan that aims to tackle leakage (a priority for customers), helps to reduce demand, and develops resilient schemes. Customers say we should make efficient use of current supplies before building new resources.
- In terms of new sources of water customers preferences are for options that are reliable, avoid environmental harm, and provide wider benefits including enhanced local amenity and recreation opportunities.
- For the draft WRMP24 customers stated their preference for the reservoir, then the new abstraction scheme in west London ahead of the Severn Thames Transfer. Reservoirs are easy to understand and are considered a natural solution that could benefit the environment, as well as provide a reliable water supply in the future and as such this is

the most accepted of the three initiatives. The lesser support for the Severn Thames Transfer was due to the scale and complexity of the project, as well as the perception that the scheme may shift the pressures on water resources elsewhere.

- Specifically on the reservoir size, customers expressed some disappointment that the plans will be for the smaller size as building a larger reservoir was thought to better protect the Thames Water area from running out of water in the future. With no obvious downside bar the immediate disruption of the build, it was felt that having a larger reservoir for a similar cost seemed like the best approach to ensure a secure water supply for the future without the need for further investment. There was positivity across age groups and geographical location. Non-Household customers in particular feel not going for a larger size, when costs are similar, is a missed opportunity.
- Whilst customers recognise the construction of new infrastructure will bring local impacts they urged that progress is made to take the new water supply options forwards, recognising the consequences of not planning properly now for the future, and that wider societal benefits should be considered over local concerns.

1.99 **Customer feedback on planning principles, policies and potential demand and supply options**³⁶: Collaborative research has been undertaken by the 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 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
- 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

1.100 **Customers' preferences for best value criteria**³⁷: 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

³⁶ WRSE, Phase 1 Research, ICS/Eftec Customer preferences to inform long-term water resource planning.

³⁷ WRSE, Phase 2 Research, Eftec, June 2022

adaptability and flexibility. This information has been used in the investment model to inform the selection of a preferred South East regional plan.

1.101 **Deep dive on sustainable abstraction**³⁸: 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

1.102 Of the eight potential enhancement areas for investment, reducing river abstraction was ranked seventh of the eight areas as shown in Figure 1-12.

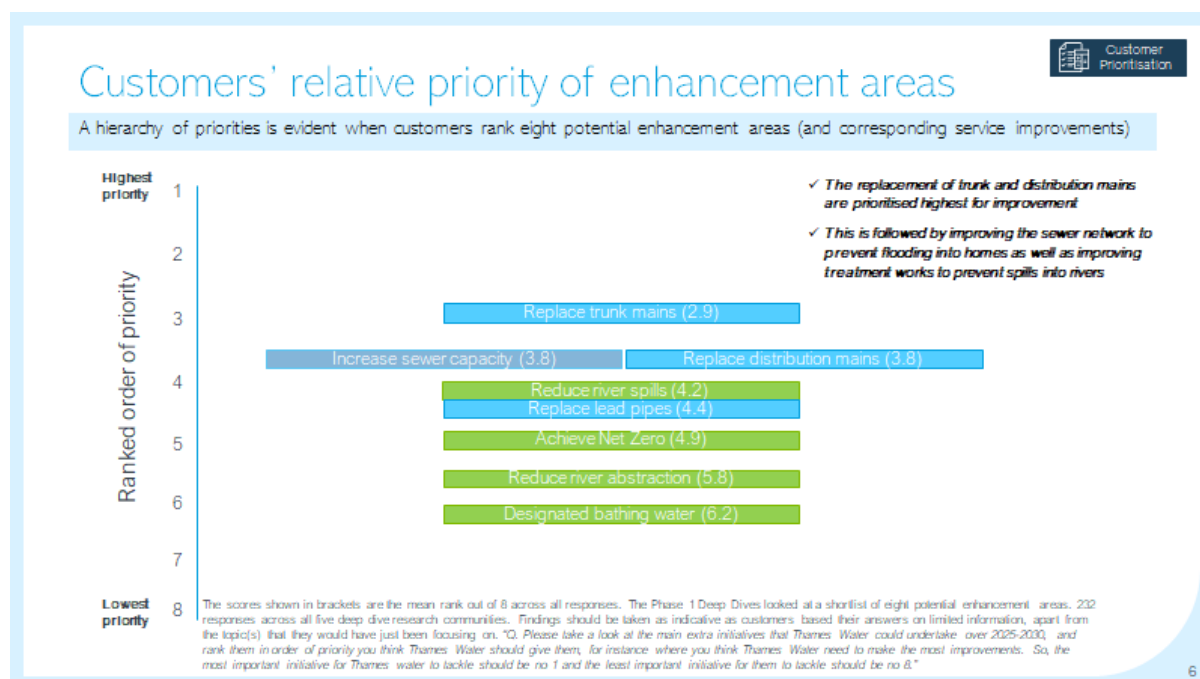


Figure 1-12: Customers' relative priority of enhancement areas

1.103 This insight was used to inform the environmental destination scenarios we developed. These are presented in Section 5.

³⁸ Thames Water, Customer Voices, PR24 Deep Dive Sustainable Abstraction, March 2022

- 1.104 **SROs and providing wider benefits**³⁹: 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 by Thames Water.
- 1.105 **SROs and potential changes to the source water for customers water supply**⁴⁰: 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 and in respect of water recycling a cross-sector working group has been established to start to develop an information and communication approach to address customer concerns and ensure future schemes are acceptable to customers and can be successfully promoted in the future.
- 1.106 **Water recycling**⁴¹: 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. We are working closely with regulators and other water companies to develop an industry-wide approach to clearly explain water recycling to ensure we provide customers with the information and assurances needed regarding the high quality of recycled water and measures to protect public health.

Research as part of the consultation

- 1.107 During the public consultation we carried out two research studies with customers designed to complement feedback to the consultation. These research studies are important to ensure we hear views which are representative of our customers, who will ultimately fund the proposals, and recognising that respondents to consultation exercises are self-selecting and generally have an interest or concern about a specific aspect of the plan, be it a watercourse or scheme and, whilst this feedback is very important and needs full consideration, it is not representative of the general population or our customers.
- 1.108 The first study was undertaken by WRSE on behalf of the South East water companies to seek feedback on the draft regional plan, it was quantitative and included a representative

³⁹ Customers preferences on added value for large resource schemes, Accent and PJM economics, August 2022

⁴⁰ Changing water sources, Britain Thinks, July 2022.

⁴¹ Thames Water, Customer Voices, Water recycling, Verve, August 2022

sample of Thames Water customers. The second study was specifically on our draft WRMP24, it was qualitative and sought feedback using the consultation questions as a framework. The two research studies are presented in summary here, with full details included in Appendix T.

Quantitative research on the draft SE plan

1.109 The research was conducted on behalf of WRSE by a specialist independent market research agency, Eftec, using an online survey with choice exercises. The sample comprised around 1,700 household and non-household customers representative of the South East, with coverage of the six water companies. The research aimed to explore:

- customer preferences on the composition and characteristics of the best value plan in the context of potential alternative plans for the South East, without bill impact thereby giving an “unconstrained” view.
- customer preferences taking account of, and testing, the sensitivity to the bill impact, providing a “constrained” view.

1.110 Participants were provided contextual information to explain the challenges for future water supply, the draft best value plan and alternative plans with information on the sources of water (supply schemes, water transfers and demand management), how these sources could be used throughout the planning period and a description of the alternative plans in terms of resilience, environmental impact and opportunity and carbon. The alternative plans were then presented again with information on the potential bill impact for customers.

1.111 The presentation of information drew on research completed previously with customers to ensure the information was clear and easy to understand, and was tested and refined to improve the presentation of information.

1.112 A summary of the main findings is presented here which accord with feedback from previous research studies. Detailed information on the methodology, and results is presented in Appendix T:

- Customers’ overall preference is for a balanced regional plan which featured a mix of strategic resource schemes and higher levels of demand management ambition
- Customers recognise the need to reduce demand and see this as an integral part of the plan however the level of support tailed off at higher bill amounts reflecting that as the cost of a plan increases for customers it became increasingly important for it to incorporate strategic resources that contribute to enhanced resilience – i.e. effectively paying for added “insurance” for security of future water supplies

Qualitative feedback on our draft WRMP24

1.113 The research was conducted by a specialist independent market research agency, Verve, using a digital pop-up community with 123 participants. The participants were shown information from the draft WRMP24 and the consultation questions were used to frame the research. The community was open for 10 days in March 2023.

1.114 The draft WRMP24 was received positively, with agreement that a plan is needed to ensure a reliable water supply for the future. The main findings are noted below. Verve

has also prepared an independent report⁴² which provides further information on the methodology, results and conclusions.

- There is a high level of trust towards Thames Water and the technical work carried out to create the plan.
- Participants thought action should be taken sooner rather than later, noting the lead time for new schemes. Although there were some concerns raised about the cost, especially in the time of economic uncertainty.
- In respect of reducing abstractions to protect the environment, there was support in principle however affordability is a concern. Some who are struggling with the current cost of living crisis felt there are more pressing societal issues that make it difficult for them to prioritise environmental improvements.
- Participants supported more action to make the best use of our existing water sources. They would like to do their bit by reducing their own consumption however considered reduction in usage at scale will be a challenge.
- There was support to halve leakage by 2050. Some felt the targets did not go far enough, although others recognised that London in particular is a challenging place to make improvements to and that minimising disruption is a realistic consideration to the overall plan.
- Participants considered investment in new infrastructure was necessary. There is little opposition to the new river abstraction at Teddington or the new reservoir in the Upper Thames catchment. Both are thought to offer environmentally friendly solutions that are good value for money. There is more opposition to the Severn Thames Transfer due to the scale and complexity of the project, as well as the perception that the scheme may shift the pressures on water resources elsewhere
- Specifically on the new river abstraction in West London, the majority of responses were positive. Those who are familiar with the location or live closer to the Teddington area were sympathetic to the objections, but overwhelmingly felt the benefit to water supplies outweighed any local concerns around environmental harm to this part of the river
- Specifically on the reservoir, this was considered to be the best solution and that it would be an asset to the local area. The concerns raised by the local community were not considered strong enough to prevent the build and many feel that having a space for recreation would be an additional benefit to the local area. There was positivity across age groups and geographical location. Non-Household customers in particular felt that not going for a larger size, when costs are similar, is a missed opportunity. Participants feel the benefits of securing a reliable water supply outweigh the concerns of those who live near the proposed reservoir site.
- The Severn Thames Transfer had the least support of the schemes. The scheme was considered to sound ambitious and difficult to complete and there were concerns that it would not be delivered. The reliability of the scheme was also questioned; it relies on other water catchments having a surplus of water to send to the Thames Water area and there were concerns from all groups that transferring water would impact negatively on wildlife.
- In the current financial climate, there is little enthusiasm for bill increases, however there is strong support to plan ahead and ensure we have a secure and sustainable water supply for the future.

⁴² 7120 Water Resource Management Plan – Thames Water, Verve, May 2023

1.115 The main messages are summarised in Table 1-2 and include a signpost to where this point is addressed in the revised draft plan.

Customer priorities and preferences	Our consideration	Section of the plan
Customers want timely action to ensure sufficient supply to meet future demand	We have worked collaboratively across the South East to develop an adaptive plan for the next 50 years. This is the primary objective of the WRMP and we have been bold in setting out the need to make decisions.	Section 10 sets out the adaptive planning framework and the decision making process and Section 11 sets out the programme of solutions that we consider need to be taken forwards to ensure a secure water supply for the future.
Companies should not plan to harm the environment. However when compared with other areas for improvement, reducing river abstraction is seen as a lower priority and customers opted for a medium reduction scenario.	We have developed an environmental destination to protect and enhance the environment. We will progress further studies and adapt the plan based on the findings, and taking account of the bill increase, noting the other investment requirements across the business.	Section 5 sets out how we have developed our environmental destination and Section 11 sets out the key decision points and the monitoring plan.
With heightened concerns about the cost of living, this was a much stronger sentiment in the research undertaken in 2023 compared to findings in 2021, and whilst there is support to plan ahead and invest in our future water supply customers felt that environmental initiatives should be funded at least in part by local authorities and central Government.	The cost of the programme and associated bill impact is an important lens in determining the scale and pace of some activities. This is part of the consideration of the Business Plan in conjunction with government and regulators. We have extended our support to customers who have difficulties in paying their water bill and will continue to develop appropriate support mechanisms.	The trade offs between the extent and pace of activities with the costs and bill impacts is part of the determination of the Business Plan in conjunction with Government and regulators.
Customers state that we should make efficient use of current supplies before building new resources. Some customers raised the risk around delivery of water savings. Some customers wanted to see a higher target for leakage reduction.	We have committed to go beyond the target to halve leakage by 2050 and in partnership, to work to achieve water use of 110 litres of water per head per day. These options make up around 80% of the shortfall forecast in our revised draft plan by 2050. We are also	Section 8 presents the demand reduction options and Section 11 presents the plan including the extensive measures to make the best use of resources. We have contingency options if the demand reduction options do not achieve the forecast savings.



Customer priorities and preferences	Our consideration	Section of the plan
	<p>planning contingency options should water savings not deliver as forecast.</p>	
<p>Customers prefer supply options that have a net positive environmental impact and deliver wider public value</p>	<p>We considered a wide range of metrics in assessing options and determining the best value plan. These were part of the decision making. Our revised draft WRMP24 includes a new reservoir which has extensive opportunities for public value.</p>	<p>Section 10 presents the best value approach and assessments, part of which is the assessment of wider benefits.</p>
<p>Investing in new water sources is seen as necessary and there is support for investment. There is little opposition to the new river abstraction at Teddington or the new reservoir in the Upper Thames catchment. Both are thought to offer an environmentally friendly solution that is good value for money.</p>	<p>We have reviewed the feedback to the draft regional plan and our draft WRMP24 consultations and taking account of revised requirements prepared revised best plans. Our revised draft WRMP24 includes both a new river abstraction in west London and a reservoir in Oxfordshire.</p>	<p>Section 10 presents the best value approach and assessments and Section 11 presents our revised draft plan.</p>
<p>Customers are more comfortable supporting bill increases for solutions considered to be low risk to the environment and have a stronger likelihood of success. For this reason, the plan for a new reservoir is the preferred of the three solutions</p>	<p>Our revised draft WRMP24 includes two strategic resource options - both a new river abstraction in west London and a reservoir in Oxfordshire, as well as some other smaller schemes.</p>	<p>Section 10 presents the best value approach and assessments and Section 11 presents our revised draft plan.</p>
<p>The Severn Thames Transfer garners the least support as it is considered to be the most likely to fail and concerns about other regions having enough water to share</p>	<p>With the additional focus on reducing demand and leakage the STT is not included in our adaptive plan as a primary option, with other options selected in preference reflecting our customers' preference as well as cost, resilience and environmental assessments. However in recognition of the delivery risks in our revised plan and the potential for</p>	<p>Section 10 presents the best value approach and assessments and Section 11 presents our revised draft plan.</p>



Customer priorities and preferences	Our consideration	Section of the plan
	future challenges to increase we are continuing to investigate the option as a back-up scheme as well as some other strategic options.	

Table 1-2: Summary of customers' priorities and preferences and how these have been addressed

Public consultation on our draft WRMP24

- 1.116 We undertook a public consultation on our draft WRMP24 for 14 weeks from 13 December 2022 to 21 March 2023 to seek feedback from customers, stakeholders and regulators on our proposals.
- 1.117 We produced a suite of documents to ensure the information was accessible to all interested individuals and organisations. The documentation comprised:
- A summary of the draft plan – This was an easy-to-read non-technical summary of the draft plan as shown in Figure 1-13
 - The full technical report, which consisted of 11 sections, 25 appendices and data tables
 - Supporting technical reports including Methodology Reports and Option Feasibility Reports



Figure 1-13: The summary of the draft plan

- 1.118 We published our draft WRMP24 on our dedicated consultation website www.thames-wrmp.co.uk along with details about the public consultation, how to participate and the information events planned during the consultation period.
- 1.119 We promoted the consultation widely and through a range of channels to regulators, stakeholders and local communities who may be interested in, or affected by, the proposals in the draft plan.
- 1.120 We wrote to over 2,000 stakeholders and interested parties, including all statutory consultees, third party organisations, retailers, developers and stakeholder organisations who had participated in our water resources stakeholder fora and stakeholders who had participated in the public consultation on our previous Water Resources Management Plan (WRMP19) to advise them of the public consultation.
- 1.121 We engaged with national and local media throughout the consultation period both proactively to raise awareness of the consultation on the draft plan and also reactively to respond to media enquiries. Media activity included interviews with BBC South Today, BBC Radio Oxford and articles in The Guardian and technical and member only publications including The Economist and New Civil Engineer. There was also considerable interest and commentary across broadcast; online and print outlets.
- 1.122 We used social media – Facebook and LinkedIn – using both organic posts and paid for advertising to raise awareness.

- 1.123 We held a series of 1-1 meetings during the consultation period including with MPs, regulators, elected councillors and local community groups to explain the draft WRMP24 and answer any questions.
- 1.124 We offered briefings and meetings to local planning authorities in our area who could be affected by aspects of the draft WRMP24. We met several local planning authorities, both political representatives and officers including the Greater London Authority, London Borough of Richmond, the Vale of White Horse District Council as well as attending meetings hosted by other organisations including a scrutiny committee meeting hosted by Oxfordshire County Council.
- 1.125 We held a forum in January 2023 to discuss the draft WRMP24, raise awareness of the public consultation and encourage feedback. We invited over 200 stakeholder organisations to join the forum and it was attended by a range of organisations including Department for Environment, Food and Rural Affairs (Defra), Historic England, Greater London Authority, Port of London Authority and Action for the River Kennet.
- 1.126 We held five community information events during the consultation period located in communities close to the proposed locations of the new water resource schemes included in our draft plan. The locations were Richmond, Abingdon, Cirencester, Steventon and Twickenham.
- 1.127 We also held four “pop-up” exhibitions in some of the main population centres in the Thames Water area at London Paddington station, the Oracle in Reading, Westgate Oxford and the Brunel centre in Swindon. The main objective of these events was to increase knowledge and understanding of the draft plan amongst wider communities and customers.
- 1.128 We held a webinar for stakeholders who were specifically interested in the Teddington Direct River Abstraction scheme on 27 February 2023 and published a Q&A document to address commonly raised questions.
- 1.129 An overview of the community events is provided in Table 1-3 with the number of attendees.

Date	Location	No of attendees
16 January	Community Information Event in Richmond	400
18 January	Pop-up event at Paddington Station, London	115
20 January	Community Information Event in Abingdon	69
27 January	Pop-up event at The Oracle, Reading	94
1 February	Pop-up event at The Westgate, Oxford	95
4 February	Pop-up event at The Brunel, Swindon	113
9 February	Community Information Event in Cirencester	54
18 February	Community Information Event in Steventon	177
27 February	Webinar focused on Teddington DRA proposal	213
3 March	Community Information Event in Twickenham	233

Table 1-3: Community information events, pop up events and the webinar

- 1.130 We also undertook research with our customers to ensure we understood our customers' views and preferences on our proposals. We undertook qualitative research with Thames Water's customer community and quantitative research in conjunction with the other SE water companies for WRSE to seek feedback on the draft plan and potential alternative plans for the region.
- 1.131 Regulators ran a query process during the consultation period. We responded to 24 queries complying with the 3-day turnaround.
- 1.132 We worked alongside WRSE to promote and engage stakeholders on the draft regional plan, this included a launch event in the Houses of Parliament, stakeholder briefings and webinars and a Q&A session.
- 1.133 We received 1,687 representations to the public consultation.
- 1.134 We worked with an independent consultancy, Mott MacDonald, to log, code and analyse the representations to ensure the approach was robust and fair.
- 1.135 We have given detailed consideration to all the points raised in representations and presented our consideration of the points, changes to the draft WRMP24 in our consultation report, the Statement of Response.
- 1.136 The main topics raised in the public consultation were:
- Forecasts of population growth
 - Forecasts of climate change
 - Our ambition to reduce the amount of water we take from the environment
 - How we can respond to different futures – called adaptive planning
 - Tackling leaks from our water pipes and our customers' pipes
 - Supporting our customers to use water wisely and reduce demand for water
 - New water resource options, specifically the proposed new abstraction on the River Thames near Teddington, a new reservoir in Oxfordshire and the water transfer from the River Severn.
- 1.137 We intended to publish our Statement of Response on 13 June 2023, within 26 weeks of the start of the consultation in compliance with the statutory timeline. However, WRSE and the six South East water companies all received approval from Defra for an extended time period until the end of August 2023 in recognition of the detailed work to review all the feedback; take account of new government policy and updated scheme information and complete the detailed technical work to ensure a robust and evidence based plan for the whole South East region, and correspondingly our WRMP24.
- 1.138 We advised all respondents to the consultation on 12 June 2023 that the publication of the Statement of Response would be delayed until the end of August 2023 and advised that we would notify them when the documents were published.
- 1.139 On 31 August 2023 we sent the Statement of Response to the Secretary of State and notified all respondents to the consultation that we had published the Statement of Response, providing consultees with a unique ID to comply with Data Protection requirements.
- 1.140 The Secretary of State will review 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 revised draft WRMP24 can be published, direct for further work, or decide to hold a public hearing, inquiry or examination if it is decided that it is in the public interest to consider points in more detail.



Engagement with our Board

- 1.141 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.
- 1.142 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 revised draft WRMP24, the Board assessed the overall quality of the plan based on the findings of the agreed assurance activity and stakeholder feedback.
- 1.143 Our Executive Management Team has engaged the Board through the development of the WRMP24 and the Board approved the revised draft WRMP24 prior to submission to the Secretary of State for Food, Environment and Rural Affairs and also the publication of the Statement of Response.
- 1.144 At key stages of the development of the WRMP24 meetings have been held with Board and Executive team members, including the Chairman, CEO, Non Executives and Executives to review and challenge. When members of the team have changed, separate meetings have been held to provide an overview of the process and content. Papers have been tabled at Executive and Board meetings throughout the process to approve the approach and content of our WRMP24, and the alignment with the South East regional plan.

Quality assurance

- 1.145 The assurance framework used for this submission is based on a risk-based assurance approach consistent with our External Reporting Policy which sets out our information principles and our proportionate assurance approach. Our proportionate assurance approach (i.e. the process by which we prepare, review, approve and release information) is aligned with Ofwat's Information and Assurance Guidance and also draws on external sources such as the Ofgem Data Assurance Guidance (which provide more comprehensive guidance) and Chartered Institute of Internal Auditors 'Three lines' model shown in Figure 1-14. It is also consistent with the assurance requirements laid out in Ofwat's Company Monitoring Framework⁴³ and meets the assessment criteria defined in the WRPG.
- 1.146 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.
- 1.147 A detailed risk assessment was completed against each component of the draft plan to identify the lines of assurance required. A comprehensive level of assurance was completed and results shared with the Board and Executive. For the revised draft plan we built on the assurance undertaken for the draft plan and focused our third Line assurance on key areas of change. The following assurance has been completed:
- Independent assurance undertaken for the technical data submission to the WRSE regional plan (Mott MacDonald)
 - Independent assurance on the revised draft WRMP24 data tables, with focused assurance on key changes, examples being supply forecast data and demand forecast (Mott MacDonald)
 - Line 3 external legal review of key sections of the revised draft WRMP24 and Statement of Response
 - 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
 - Internal review and checks as Line 1 and 2 of all areas of the revised draft plan.
 - A similar Line 1 and 2 process has been undertaken for the Statement of Response, taking into account that over 8,000 individual queries have been received from close to 1,700 representations, and further representations from regulators which included multiple queries. As part of the assurance we are aware of the potential risk of inconsistencies in our responses across this large number of queries, and carried out cross checking to mitigate this as far as possible.

⁴³ The latest iteration of Ofwat's Company Monitoring Framework: <http://www.ofwat.gov.uk/publication/company-monitoring-framework-final-position/>

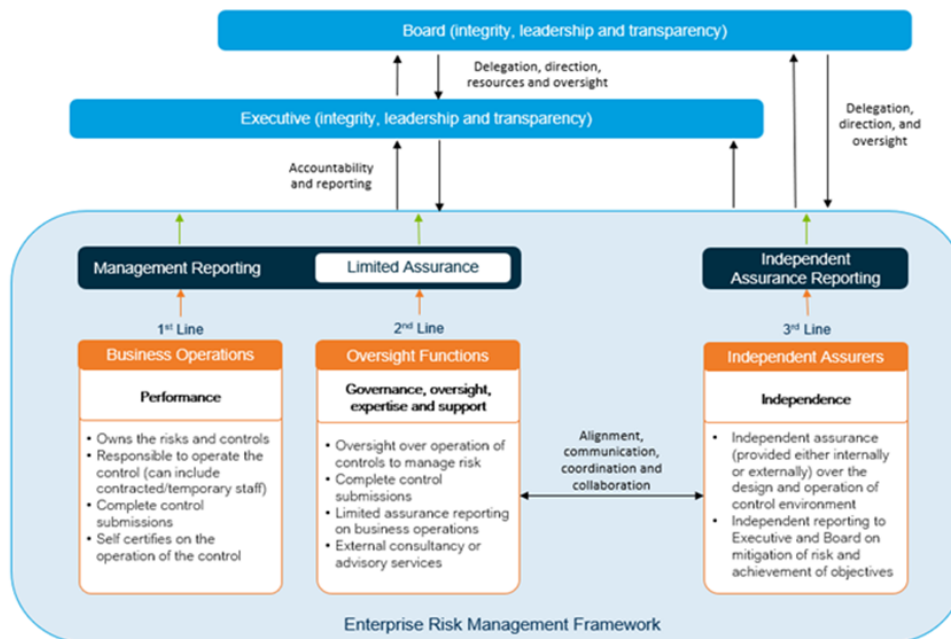


Figure 1-14: Assurance approach for the draft WRMP24

1.148 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 the South East 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.

Annex 1: Board Assurance Statement

Board Statement

1.149 Having reviewed the revised draft WRMP24 and all relevant supporting assurance, the Thames Water Board has reviewed the statements provided in the guidance to confirm that it is satisfied that:

- 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.
- 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

1.150 On review of the statements the Board confirmed satisfaction with the content, with a requirement for one addition. This addition is to confirm that 'our plan is the best value plan within the requirements of the updated water resources planning guidance'. This takes into account the revised requirement since the draft plan for each water company, and not region, to achieve a reduction to 110 l/h/d by 2050. This has assisted in increasing our reliance on demand reduction during a severe drought to 80% by 2050, and removing a strategic supply option from our plan. Therefore, the final assurance statement has been re-worded as:

- Our plan is the best value plan for managing and developing our water resources **within the requirements of the updated water resources planning guidance**⁴⁴. 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.

1.151 The Board approved the revised draft WRMP24 prior to submission to the Secretary of State for Food, Environment and Rural Affairs, with this change to the assurance statements.

Supporting Statement

1.152 The Board has engaged, overseen and scrutinised key 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, including review of the development of the Water Resources SouthEast plan and the Executive engagement in the regional plan.

⁴⁴ Water resources planning guideline, March 2023_Updated_FINAL, Environment Agency, March 2023

