



Revised Draft Water Resources Management Plan

Technical Appendix Z –
Defra Directions Checklist



Contents

Defra Directions 2022	2
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Tables

Table Z-1: Defra Direction 2022 checklist.....	9
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Defra Directions 2022

- Z.1 The Secretary of State has issued specific Directions (in force 28 April 2022) that a water company must follow in order to comply with their statutory duties under the Water Industry Act 1991. In the following table we set out these Directions and signpost where they are addressed in the draft WRMP24, with the following exceptions:
- Direction 1 relates to citation, commencement, extent, application, and interpretation of the Direction. This is general information, so is not included in the table
 - Direction 2 relates to the planning period of a WRMP, sub-sections 2 and 4 are only relevant to Southern Water, so are not included in the table

Direction number	Direction category	Direction sub - category	Direction	Location in WRMP
2	Planning period of WRMP	1	"Other than Southern Water Services Limited, a water undertaker must prepare a water resources management plan for a period of at least 25 years commencing on 1st April 2025."	We have provided a plan that covers a time period from 1 April 2025 to 31 March 2075 (Section 1 and WRMP Tables).
		3	"Other than in the case of Southern Water Services Limited, the Water Resources Management Plan Direction 2017(a) does not apply to any water resources management plan, the planning period for which commences on or after 1st April 2025. "	Noted – N/A
3	Matters to be addressed in a WRMP	1	"In accordance with section 37A(3)(d), a water undertaker must include in its water resources management plan a description of the following matters— "	
		1a	"the appraisal methodologies which it used in choosing the measures which it has identified in accordance with section 37A(3)(b) and its reasons for choosing those measures;"	We have followed the approaches set out in the WRPG 2022 to appraise options and produce our preferred plan. In Sections 7 and 8 we set our approach for the appraisal of demand management and resource options. In Section 9 we present the environmental assessment to support our plan. In Section 10, we select an adaptive, best value approach to long-term planning commensurate with the level of risk to security of supply, which is consistent with the SE regional plan.
		1b	"for the first 25 years of the planning period, its estimate of the average annual risk, expressed as a percentage, that it may need to impose prohibitions or restrictions on its customers in relation to the use of water under each of the following— (i) section 76(b); (ii) section 74(2)(b) of the Water Resources Act 1991(c); and (iii) section 75 of the Water	WRMP Tables, Table 2f

Direction number	Direction category	Direction sub - category	Direction	Location in WRMP
			Resources Act 1991, and how it expects the annual risk that it may need to impose prohibitions or restrictions on its customers under each of those provisions to change over the course of the planning period as a result of the measures which it has identified in accordance with section 37A(3)(b).	
		1c	"the assumptions it has made to determine the estimates of risks under sub-paragraph (b), including but not limited to drought severity.	<p>Section 4 of our WRMP outlines our supply forecast, including the description of methods used to determine our supply capability under droughts of different severity. In this section, and in Appendix I, it is described that our Level of Service regarding each demand restriction step is a key input to our supply-side modelling.</p> <p>Section 3 of our WRMP outlines our demand forecast, including a description of the scenarios we have assessed within our demand forecast.</p> <p>Our WRMP, as outlined in Sections 10 and 11, we describe how we have derived a programme which ensures supply-demand balance under a range of scenarios, with each scenario being based on assuming supply and demand forecasts derived in the sections referenced above.</p>
		1d	in respect of greenhouse gas emissions— (i) the emissions of greenhouse gases which are likely to arise as a result of each measure which it has identified in accordance with section 37A(3)(b), unless that information has been reported and published elsewhere and the water resources management plan states where that information is available.	<p>(i) Section 7 of our WRMP, section on Carbon Assessment, details the methods applied in the assessment of carbon emissions associated with individual options.</p> <p>(i) Section 11 of our WRMP, section on costs and carbon emissions, sets out the emissions which are likely to arise from each measure in the plan. This information is an output of the WRSE investment</p>

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			<p>(ii) how those greenhouse gas emissions will contribute individually and collectively to its greenhouse gas emissions overall.</p> <p>(iii) any steps it intends to take to reduce those greenhouse gas emissions; (iv) how these steps will support the delivery of any net zero greenhouse gas emissions commitment made by it; and (v) how these steps will support delivery of the UK government's net zero greenhouse gas emissions targets and commitments.</p>	<p>model, which calculates carbon emissions according to the capital emissions (required to construct an option), the fixed operational emissions (required if an option is constructed, regardless of use) and the variable operational emissions (calculated according to an option's utilisation). The inputs (capital emissions, fixed operational emissions, and variable operational emissions) are calculated according to the methods set out in Section 7.</p> <p>(ii) Using the same outputs as noted, emissions for all schemes in the plan are totalled for each AMP up to 2050, and for the whole planning period. This is compared against TW's currently reported emissions.</p> <p>(iii) Section 7 of the WRMP, section on carbon assessment, includes details of steps that are being taken to investigate reduction of carbon emissions.</p> <p>(iv) and (v) The UK's net zero emissions targets, Thames Water's net zero targets, and meeting of these targets (including how noted investigation into carbon reduction will help in meeting these targets) is discussed in Section 11, section on costs and carbon emissions.</p>
		1e	<p>the assumptions it has made as part of the supply and demand forecasts contained in the water resources management plan in respect of—</p> <p>(i) the implications of climate change, including in relation to the impact on supply and</p>	<p>(i) Baseline supply – Section 4 and Appendix U; Baseline demand – Section 3; Uncertainty – Section 6; Options – Section 7, specifically sub-section on Option DO Assessment and Table 7-6.</p> <p>(ii) Section 3, and WRMP Tables.</p>

Direction number	Direction category	Direction sub - category	Direction	Location in WRMP
			<p>demand of each measure which it has identified in accordance with section 37A(3)(b).</p> <p>(ii) household demand in its area, including in relation to population and housing numbers, except where it does not supply, and will continue not to supply, water to domestic premises.</p> <p>(iii) non-household demand in its area, except where it does not supply, and will continue not to supply, water to non-domestic premises or to an acquiring licensee.</p>	(iii) Section 3, and WRMP Tables.
		1f	<p>its intended programme for the implementation of domestic metering including—</p> <p>(i) the proportion of smart meters to other meters.</p> <p>(ii) if it does not intend to install smart meters, the reasons for this.</p> <p>(iii) its estimate of the cost of that programme, including the costs of installation and operation of meters.</p>	<p>(i) Section 8.5 – we are installing all new smart meters and upgrading existing basic meters to smart. As such, no “other” meters. Also, Section 11 and Appendix R.</p> <p>(ii) As noted, all meters intended to be “smart”. Section 8.5 – number of meters that are not charged by reference to volume regarding bulk meters. Also Section 11 and Appendix R.</p> <p>(iii) Methodology for derivation of programme in Section 8. Cost of metering programme in WRMP Tables, Table 8.</p>
		1g	<p>its estimate of the total number of meters installed to record water supplied to domestic premises at the commencement of the relevant planning period and including a breakdown of:</p> <p>(i) the number of smart meters.</p> <p>(ii) the number of meters that are not charged by reference to volume.</p> <p>(iii) the number of meters that are charged by reference to volume including:</p> <p>(aa) optant metering.</p> <p>(bb) change of occupancy metering.</p> <p>(cc) new build metering.</p>	<p>(i) and (ii) Number of meters installed is summarised in Section 11, Table 11-1. Line 0FPM details total smart meters, but this is not broken down into meters charged/not charged by volume.</p> <p>(iii) as below:</p> <p>(aa) available in WRMP tables; Table 3c, reference 34.2FP</p> <p>(bb) we don’t record change of occupancy metering, these are captured under optants (aa)</p> <p>(cc) available in WRMP tables; Table 3c, reference 34.1FP.</p>

Direction number	Direction category	Direction sub - category	Direction	Location in WRMP
			(dd) compulsory metering. (ee) selective metering.	(dd) compulsory metering, as per (i). (ee) we do not undertake selective metering.
		1h	its estimate of the total number of domestic premises which will become subject to domestic metering during the planning period and including a breakdown of: (i) the number of domestic premises with smart meters. (ii) the number of domestic premises with meters that will not be charged by reference to Volume. (ee) the number of domestic premises with meters that will be charged by reference to volume including: (aa) optant metering. (bb) change of occupancy metering. (cc) new build metering. (dd) compulsory metering. (ee) selective metering;	(i) Number of meters installed is summarised in Section 11, Table 11-1. All except bulk meters are charged by volume. (ii) Number of meters installed is summarised in Section 11, Table 11-1. Bulk meters are not charged by reference to volume. (ee) as below: (aa) available in WRMP tables; Table 3c, reference 34.2FP. (bb) we don't record change of occupancy metering, these are captured under optants (aa). (cc) available in WRMP tables; Table 3c, reference 34.1FP. (dd) compulsory metering, as per (i). (ee) we do not undertake selective metering.
		1i	its estimate of the impact on demand for water in its area of any increase in the number of premises subject to domestic metering.	See WRMP Tables, Table 8e, line E5.
		1j	its assessment of the cost-effectiveness of domestic metering as a mechanism for reducing demand for water by comparison with other measures which it might take to meet its obligations under Part III of the Act.	Considered within Section 8 - demand options, with costs documented in WRMP Tables 5.
		1k	its intended programme to manage and reduce leakage, including anticipated leakage levels and how those levels have been determined.	Section 8 – Demand Options, and Section 11. Anticipated leakage levels are included in Table 2, line 5FPW (whole company) and line 29FP. MI/d benefit of leakage reduction plan is included in line 23.1FP-28.1FP per WRZ.

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		1l	if leakage levels are expected to increase at any time during the planning period, why any increase is expected and if so, the proposed plan of works that will be undertaken to mitigate this.	Annually reported leakage is not planned to increase.
		1m	how its intended programme to manage and reduce leakage will contribute to: (i) a reduction in leakage by 50% from 2017/18 levels by 2050. (ii) any leakage reduction commitment it has made in respect of its appointment area.	(i) Section 8 – Demand Options details the leakage reduction programme, as does Section 11. Also visible from Table 2A (ii) N/A
		1n	In respect of any relevant regional water resources plan: (i) how this plan has been considered and reflected in its water resources management Plan. (ii) where the plan has not been considered and reflected in its water resources management plan, the reasons for this.	The WRSE Regional Plan is reflected directly in our WRMP. Our WRMP preferred plan and preferred programme is the Thames Water part of the WRSE Regional Plan. The only amendments are inclusion of small options in AMP8 to mitigate AMP7 demand management delivery risk. This is detailed in Section 11 of the WRMP.
4	"Submitting draft water resources management plans and water resources management plans to the Secretary of State "	a-d	4. Except where the Secretary of State otherwise directs and subject to sub-paragraph 4(c), for the purpose of section 37B(1) of the Act: (a) Other than in the case of Southern Water Services Limited, a water undertaker must send a draft of its water resources management plan to the Secretary of State on or before 3rd October 2022. (b) Southern Water Services limited must send a draft of its water resources management plan to the Secretary of State on or before 13th June 2022. (c) In the case of a new appointment under section 6 or variation under section 7 of the Act, the undertaker must send a draft of its first water resources management plan to the Secretary of State within 6 months of the date of the appointment.	We submitted our draft plan to the Secretary of State on the 3 rd October 2022 for the purposes of national security and commercial confidentiality review. This Appendix refers to the revised draft plan, which is not subject to this direction.

Direction number	Direction category	Direction sub - category	Direction	Location in WRMP
			(d) Where section 37A(6)(a) of the Act applies, the undertaker must send a draft of the revised water resources management plan to the Secretary of State within 6 months of the date on which the material change of circumstances occurs.	
5	Publication of draft water resources management plans	1	Except where the Secretary of State otherwise permits, a water undertaker must publish its draft water resources management plan in accordance with section 37B(3)(a) for consultation within 30 days beginning with the date on which the Secretary of State confirms it should do so.	Our draft plan was published for consultation on 13 December 2022. This consultation ended on 21 March 2023. This Appendix covers the revised draft plan, which is not subject to consultation.
		2	Except where the Secretary of State otherwise permits, a water undertaker must publish its final water resources management plan in accordance with section 37B(8)(a) within 30 days beginning with the date on which the Secretary of State confirms it should do so.	We will comply the requirements of the legislation in respect of publishing our final plan, unless agreed otherwise with the Secretary of State. This Appendix covers the revised draft plan, which is not subject to this direction.
6	Responding to representations		Except where the Secretary of State otherwise permits, a water undertaker must publish the statement required by regulation 4(2)(a) of the Water Resources Management Plan Regulations 2007(a), and send a copy of the statement to the persons specified in regulation 4(2)(b), within 26 weeks beginning with the date of publication of the draft water resources management plan.	Our draft WRMP was published for public consultation for 14 weeks starting on 13 December 2022. As such, according to the 26-week schedule our Statement of Response should have been published on 13 June 2023. We received permission from Defra to publish our Statement of Response on 31 August 2023.

Table Z-1: Defra Direction 2022 checklist

