



# Draft Water Resources Management Plan 2024

Technical Appendix S - Engaging with  
Stakeholders

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## Background and Introduction

There is wide interest in the sustainable management of water resources 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. Engagement with regulators, stakeholders and local communities has been an important part of the development of the draft regional plan and our draft Water Resources Management Plan (draft WRMP24). We have endeavoured to engage effectively with the diverse range of stakeholders and ensure everyone has the opportunity to participate in the development of long term plans for water.

The South East regional plan is the foundation for our draft WRMP24. It is therefore important that stakeholders understand the overall strategic planning framework, the key decision points, and opportunities to contribute. We worked closely with Water Resources South East (WRSE) to ensure there was a clear line of sight for stakeholders between the regional plan and our draft WRMP24.

We engaged with regulators, stakeholders and customers throughout the development of the regional plan to ensure visibility and understanding of the objectives and approach, sharing information in a clear and accessible way and providing opportunities to input and shape the plan at a formative stage.

We also undertook pre-consultation activity with regulators and stakeholders on our draft WRMP24.

In this appendix we set out the regulatory requirements and expectations with respect to engagement; the engagement undertaken to inform and shape the South East regional plan; the additional engagement we have undertaken to inform our draft WRMP24; outline the plans for consultation on the draft WRMP24, and explain the interaction with the regulatory process to examine strategic water resource solutions.

- S.1 There have been significant changes to the water resources planning framework since WRMP19, principally the publication of the National Framework<sup>1</sup> and the strengthened role of regional planning.
- S.2 In the South East we have worked in partnership with Water Resources South East (WRSE), an alliance of the six water companies<sup>2</sup> who operate in the South East region, to develop the best value plan for the region. We have engaged with regulators, stakeholders and customers throughout the development of the regional plan to ensure visibility and understanding of the objectives and approach, to share information in a clear and accessible way and provide opportunities to input and shape the plan at a formative stage.
- S.3 We have also considered local stakeholders who have an interest in our plan, this may be in relation to a particular watercourse, catchment, or scheme, and we have also endeavoured to engage effectively with these stakeholders through the process.

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<sup>1</sup> Environment Agency, National Framework for Water Resources, March 2020

<sup>2</sup> Affinity Water, Portsmouth Water, Southern Water, SES Water, South East Water, and Thames Water

S.4 In this appendix we provide information on the engagement undertaken to inform the draft regional plan, the foundation to our draft WRMP24, and engagement specifically undertaken on our draft WRMP24. The structure of the appendix is as follows:

- Regulatory requirements and expectations
- Overview of engagement on the South East regional plan
- Overview of pre-consultation activity on our draft plan
- Plans for public consultation
- Interaction with the strategic water resource solutions

## Regulatory requirements and expectations

- S.5 The Water Resources Planning Guideline (WRPG)<sup>3</sup> specifies the need for engagement at an early stage of the development of the plan with water company Boards, regulators, customers and interested parties. The engagement should aim to provide the opportunity to seek views and gain feedback, helping to identify and resolve concerns early in the process.
- S.6 The WRPG also sets out the following requirements in relation to engagement and consultation:
- Pre-consultation discussions with statutory consultees:
    - the Environment Agency and the Secretary of State for Environment, Food and Rural Affairs (Secretary of State)
    - Natural Resources Wales (NRW) and the Welsh Ministers if the plan will affect sites in Wales
    - Ofwat
    - any licensed water supplier that supplies water to premises in your area through your supply system
    - Cadw (in relation to SEA in Wales)
    - Natural England or Natural Resources Wales in relation to options which could affect a designated site, e.g. SACs, SPAs, Ramsar sites and SSSIs.
  - Pre-consultation discussions with non-statutory consultees including:
    - Water suppliers affected by our supply system
    - Water companies with whom we have bulk supply or shared resource agreements
    - Neighbouring water companies
    - Local catchment partnerships
    - Potential water suppliers, companies or third parties who may want to trade
    - CCW (formerly Consumer Council for Water)
    - Water retailers
    - DWI
    - RAPID
    - National Infrastructure Commission
    - Forestry Commission
    - Local nature partnerships (where applicable)
    - Water efficiency groups
  - Enhanced pre-consultation with the Environment Agency and Ofwat to discuss ambition, methods and the approaches as well as specific topics such as WRMP19 delivery; the resource zones; problem characterisation assessment; assessment of climate change and the indicative supply-demand balance at a resource zone level
  - Early discussion with regulators on a long term destination for environmental improvement and sustainable abstraction, a new aspect that was highlighted for this round of planning
  - The need to hold a public consultation on the draft WRMP including the importance of promoting and sharing the draft plan effectively with interested stakeholders and

<sup>3</sup> Environment Agency, Ofwat, NRW - Water Resources Planning Guideline, Updated July 2022.

providing opportunities to explain the plan clearly through meetings, events and exhibitions

- The need to produce a statement of response within 26-weeks of publishing the draft plan for consultation which must:
  - Show consideration of the representations received
  - Set out the changes made to the draft plan as a result of the representations, and the reasons for making them
  - Say if changes have not been made as a result of representations, and explain why
  - Describe anything that has changed during the consultation period

S.7 We have complied with legal requirements and expectations set out in the Environment Agency's National Framework<sup>1</sup> and Water Resources Planning Guideline<sup>2</sup> in designing our pre-consultation and consultation activities.

S.8 In addition, we are also required to comply with the requirements of the Strategic Environmental Assessment (SEA) Regulations<sup>4</sup> and Habitats Regulations<sup>5</sup>, which have their own specific consultation obligations. Information on these aspects is presented in Section 9 of the draft WRMP24.

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<sup>4</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (S.I. 2004 No. 1633)

<sup>5</sup> The Conservation of Habitats and Species Regulations 2010 (as amended by the Conservation of Habitats and Species (Amendment) Regulations 2011, and the Conservation of Habitats and Species (Amendment) Regulations 2012)

## Pre-consultation on the South East regional plan

### Overview

- S.9 Engagement has been an integral part of developing the South East regional plan. Since 2019 WRSE has undertaken a comprehensive programme of engagement, in partnership with the member companies, to ensure the regional plan was developed in collaboration with water-using sectors from across the region and using insight from customers and stakeholders. This is important for our draft WRMP24 as our draft plan closely reflects the regional plan.
- S.10 WRSE has endeavoured to work openly and transparently, sharing information in a timely way, and across a range of channels and activities, to enable participation and ensure stakeholders are clear about why they are being consulted, the scope of the consultation and how that fits with the wider water resources planning landscape.
- S.11 WRSE published, and consulted on, its approach for stakeholder engagement and updated its method statement<sup>6</sup> in response to feedback. This was important in setting out the framework and approach from the outset.
- S.12 WRSE has worked closely with government and regulators and is represented at several forums including the National Framework Senior Steering Group, Policy Task and Finish Group and Regional Coordination Group and has contributed to defining policy requirements and methodological approaches.
- S.13 WRSE has established strong links with the other four regional groups and held structured reconciliation discussions to ensure the regional plans are coordinated and provided a coherent national picture.
- S.14 Water industry regulators have been involved at all levels of WRSE and have actively engaged throughout the development of the regional plan, for example the Environment Agency (EA) is represented on the Senior Leadership Team (governance and decision making), the Programme Management Board (technical workstreams), and the Engagement and Communications Board (engagement workstreams), as well participating in workshops and topic specific briefings.
- S.15 WRSE has established three stakeholder advisory groups – the Stakeholder Advisory Board, the Environmental Advisory Group and the Multi-sector Advisory Group. These advisory groups have helped to guide the development of the plan. Membership of each of the advisory groups is presented in Annex 1.
- S.16 WRSE has shared information, and sought feedback, from the wide stakeholder community through meetings, workshops and WRSE hosted webinars for example WRSE, in collaboration with the Rivers Trust, hosted four workshops with catchment partners and wider stakeholders focused on identifying catchment level issues and potential options. These workshops resulted in over 300 catchment solutions being proposed. A full log of WRSE-led engagement over the period from 2020 to July 2022 is presented in Annex 2.
- S.17 The water companies also held stakeholder meetings. For example Thames Water and Affinity Water continue to jointly host a regular Water Resources Forum to give stakeholders the opportunity to keep up to date, and contribute to, the discussions on the long-term water resource

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<sup>6</sup> WRSE Method Statement on stakeholder engagement, July 2021

planning. WRSE has joined all of these Forums to ensure the connectivity between the regional plan and companies' WRMPs is fully understood.

### Fuller detail on the engagement

- S.18 WRSE has held consultations on the building blocks of the plan including the planning challenge, the resilience framework, regional policies, method statements and best value planning approach. WRSE has taken account of the feedback in its approach and produced a series of response documents to each of the consultations to set out the feedback received and consideration of the points raised. These are available at <https://www.wrse.org.uk/library>.
- S.19 WRSE has maintained regular communications through a dedicated website and quarterly newsletter, as well as using social media and the wider media to showcase and raise awareness of the plan.
- S.20 An overview of WRSE's engagement framework is shown in Figure S - 1. The engagement framework has three main phases: Plan and prepare; develop; consult and update.
- Plan and prepare – up to 2020, the focus was on the 'building blocks' of the regional plan. This covered the technical methods, approaches and tools that would be applied in the development phase, for example, the forecasts for future growth and demand for water; the environmental assessments; and the regional policies. WRSE ran a programme of webinars and held topic-specific consultations to give stakeholders the opportunity to engage and input to the development of the plan.
  - Develop – during 2021, the focus broadened and set out the planning challenge for the region, sharing information on feasible solutions, including the strategic resource options (SROs), and formulating the approach to determine the best value regional plan.
  - Consult and update – during 2022, WRSE held an 8-week period of engagement and consultation on the 'emerging' regional plan.

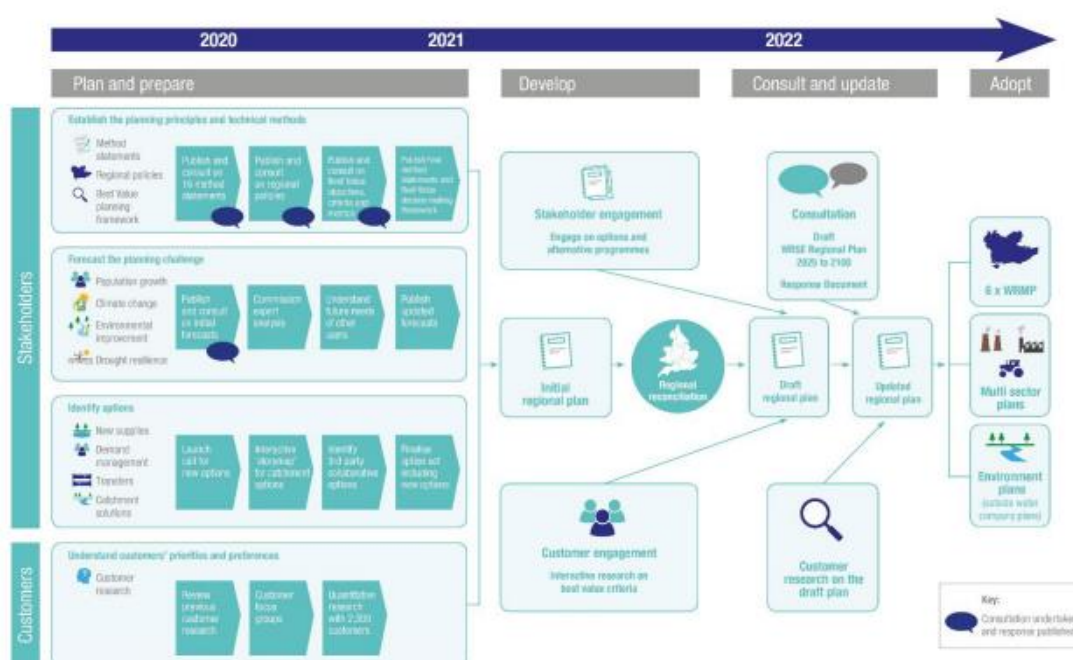


Figure S - 1 An overview of WRSE's Engagement Framework



- S.21 WRSE published a report<sup>7</sup> on the stakeholder engagement undertaken which summarised the extensive engagement and consultation activity that has taken place up to January 2022. The report covered the structure and governance arrangements, the engagement activities and how these have informed decisions leading up to the consultation on the emerging regional plan in early 2022.
- S.22 In January 2022 WRSE consulted on the emerging regional plan. The consultation extended over eight weeks and took place between January and March 2022. The emerging plan gave early sight of the big issues and emerging solutions to gain initial feedback from stakeholders. As well as publishing documents for review and comments, a series of online workshops were held for stakeholders to provide an overview of the plan, the work to date and further work planned to transition to a best value plan.
- S.23 WRSE, and the South East water companies, proactively raised awareness of the consultation on the emerging plan and undertook a range of actions to explain the plan and encourage wide participation. The activities included:
- Pre-briefings with a range of organisations including Council for Protection of Rural England (CPRE), National Farmers Union (NFU), National Infrastructure Commission (NIC), Blueprint for Water and CCW
  - Meetings with the action group – the Group Against Reservoir Development to discuss their technical challenges
  - Proactive engagement with the media to ensure clear and balanced reporting
- S.24 WRSE and South East water companies received 10 requests for technical data and information from the action group – Group Against Reservoir Development. These requests included information on abstraction licences, stochastic river flow data, scheme deployable output data and cost data. We treated these data requests as Environmental Information Requests (EIR) in view of the detailed nature of the information requested. In collaboration with WRSE and other South East water companies, we collated and provided the data, where this was available, in line with EIR requirements and timetable. We also held a meeting with the Group Against Reservoir Development's technical advisor to review the information requests to ensure there was a complete understanding of what information could be provided and what information could not be provided and the reasons for this.
- S.25 WRSE received over 1,150 written responses to the consultation. Figure S - 2 provides a summary of the consultation, and responses, on the South East emerging plan. Over half of the individual responses to the consultation on the emerging plan focused on specific water resources options identified for development, such as large new reservoirs, strategic water transfers, and water recycling schemes.

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<sup>7</sup> WRSE Stakeholder Engagement Report, January 2022

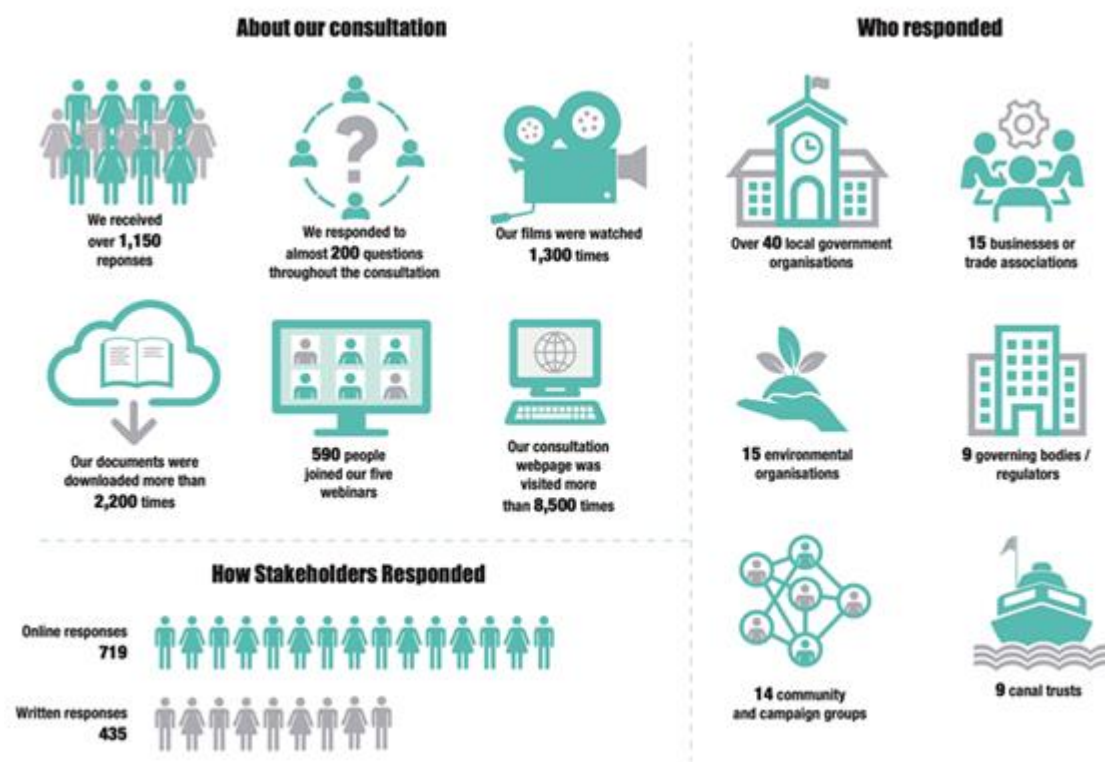


Figure S - 2 The consultation on the South East emerging plan

- S.26 WRSE published a response document<sup>8</sup> in May 2022 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 resultant action.
- S.27 Many of the comments received from stakeholders focused on specific technical areas but, in general, WRSE received feedback in support of the adaptive planning approach employed and the proposals for significant leakage and water efficiency measures, as well as greater protection for the environment through abstraction reductions.
- S.28 A key concern from stakeholders were the 'branch points' selected in the regional modelling and the logic for selecting the timing of them. Some additional concerns were raised on population and environmental data and assumptions underpinning the emerging regional plan which WRSE have addressed in their best value regional plan by ensuring a wide range of pathways are available within the models.
- S.29 In respect of comments on specific water resources options identified for development in the plan, such as large new reservoirs, strategic water transfers, and water recycling schemes, WRSE and the relevant water companies will continue to work with stakeholders as plans for these large schemes progress.

<sup>8</sup> WRSE Emerging Regional Plan: Consultation Response Document, May 2022

## Pre-consultation on our draft WRMP24

- S.30 Our draft WRMP24 closely reflects the South East regional plan and as outlined above we have worked closely with WRSE on the engagement to inform the development of the regional plan, which directly supports our draft WRMP pre-consultation activities.
- S.31 To compliment the engagement led by WRSE on the regional plan we have continued to host a regular Water Resources Forum in conjunction with Affinity Water. We joined with Affinity Water recognising there is considerable overlap in the respective stakeholder communities and to make engagement as easy as possible for stakeholders. The Water Resources Forum is open to all interested organisations, including statutory and non-statutory consultees. It is chaired by Thames Water's Director of Sustainability and has presentations from WRSE, Thames Water, Affinity Water and independent topic experts. Its purpose is to update stakeholders on our work and to give them the opportunity to discuss and challenge our approach and to highlight issues and concerns. The agenda for these Forums is aligned with the work programme and also in response to feedback from stakeholders. Since 2020 we have held nine Water Resources Forum. We share recordings and minutes of the Forum with attendees. Table S - 1 sets out the schedule of Forums and the main topics covered.

Date	Overview of topics
February 2020	Overview of strategic resource options Introduction to setting an environmental destination
June 2020	Working together Planning for resilience
September 2020	Setting our environmental destination and assessing the impact, benefits and value Overview of the work to assess potential solutions
December 2020	Environmental destination and understanding our catchments Looking at potential options
March 2021	Best value planning – the proposed approach Hearing from customers
November 2021	Update on the challenges and work to plan for an enhanced environment
February 2022	Overview of the South East emerging plan Focus on reducing demand
June 2022	Feedback on the responses to the consultation on the emerging plan and WRSE's response, topic-by-topic discussion
September 2022	Overview of the current water resources situation Update on work to develop the best value plan Expert review and scrutiny, and assurance

**Table S - 1 Overview of the Water Resource Forums held since 2020**

- S.32 We have also engaged with statutory and non-statutory consultees on a one-one basis to share information on our draft WRMP24 and listen to their feedback. An overview is presented in Table S - 2.

Consultee	Scope of discussions
Environment Agency (EA)	<p>Since December 2020 we have held 18 pre-consultation meetings to discuss water resources matters including our approach and technical aspects to ensure the Environment Agency has the opportunity to raise concerns, contribute to the work, and to agree approaches and technical methods where required.</p> <p>We have also held meetings as part of wider regulatory engagement on water resources including discussion on Deephams water recycling, the 2022 summer drought situation and in determining our environmental destination. The engagement, and work, with the EA and wider environmental stakeholders is presented in detail in Sections 5 and 9.</p> <p>We also provide 6-monthly and annual progress reports to the EA and the Secretary of State on WRMP19. These are also published on our website to ensure transparency.</p> <p>In addition, we have engaged with the EA, through RAPID, focused on the strategic resource options.</p>
Ofwat	<p>We have held two pre-consultation meetings with Ofwat (January and May 2022) to cover the components on the draft plan and to give them the opportunity to raise concerns and contribute to the work. This has been helpful and facilitated discussion on several points including the deferment of supply schemes from WRMP19 delivery, the baseline demand management calculation and the approach to developing the leakage strategy. In addition, we have engaged with Ofwat, through RAPID, focused on the strategic resource options.</p>
Natural England (NE)	<p>We have held three meetings with NE to discuss relevant aspects of the WRMP, the topics discussed include:</p> <ul style="list-style-type: none"> <li>• Our approach to environmental assessments for our options, both at Stage 1 (high level assessment, carried out with WRSE) and Stage 2 (detailed assessment) and updates on the results of our assessments</li> <li>• Our review of emerging policy changes, particularly where this meant that options needed to be rejected on environmental grounds</li> <li>• Our work with WRSE on SEA scoping and the programme for the environmental assessment of our draft plan</li> <li>• Catchment options</li> </ul>
Drinking Water Inspectorate (DWI)	<p>The primary role of the DWI is to ensure the safety and quality of drinking water. We invited the DWI to join our meetings with the EA, the WRF and have engaged with the DWI as part of the work on the strategic resource options.</p> <p>We also held a pre-consultation meeting with the DWI in September 2022 where we provided an update on the work to develop the draft WRMP24 and sought feedback on any concerns.</p>

Consultee	Scope of discussions
Historic England (HE)	<p>We engaged with Historic England in the preparation of the SEA, alongside wider stakeholders.</p> <p>We have also had initial discussion with Historic England on a number of the strategic resource options that are under investigation.</p>
NRW & Welsh Government	<p>There is ongoing work to examine a water transfer in collaboration with United Utilities and Severn Trent Water, this is one of the strategic resource options that is being investigated. Since WRMP19 we have continued to work with NRW, and brief 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.</p>
Oxfordshire - Elected representatives (MPs, county, district and parish councillors), and local council officers	<p>Meetings with MPs, county and district councillors, local authority officers and parish councils in Oxfordshire recognising the heightened interest in the potential reservoir in the local area. These meetings have provided the opportunity to have conversations on the planning process, policy and technical aspects of the plan and to listen to issues and concerns. This is in addition to Officer engagement on the strategic resource options.</p>
Across TW supply area - Elected representatives (MPs and county and borough councillors), local council officers	<p>Meetings with politicians, elected representatives and local authority officers beyond Oxfordshire on water resources planning and to introduce the WRMP and strategic options that are under consideration including London water recycling and the Severn to Thames Transfer, to share information and seek feedback on the schemes and initial concerns at this early stage of scheme development.</p>
Environmental NGOs	<p>Engagement with environmental NGOs including Chalk Streams First and catchment partnerships to identify opportunities for partnership working and potential schemes to help to protect and improve the environment.</p>
Catchment partnerships	<p>We have representatives on all the catchment partnerships in Thames Water's supply area and have raised awareness with them of the work on the regional plan and our WRMP24. We also published an article in our Environmental Newsletter (Summer 2022) which was sent to over 30 partnerships of over 200 NGOs across our supply area.</p>
Wide stakeholder community	<p>In addition to invitation to the WRF, we have offered the opportunity to meet and discuss the water resource challenges and our work to plan to address these challenges. The meetings held to date include the University of Oxford, CBI, London First, Thames Valley Chamber of Commerce and NFU.</p>
Other water companies, Waterwise and retailers	<p>In addition to invitations to the WRF we continue to engage 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. For example we have worked closely with non-household retail water sector to pilot a water efficiency incentive scheme, aimed to reward retailers for providing evidence of water efficiency interventions on business sites.</p>

Consultee	Scope of discussions
Housing Developers	We try to proactively work with the housing developer community to raise awareness of water pressures 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.
Third parties and potential suppliers	<p>We have proactively sought to raise awareness and identify potential options to trade or share resources with third party organisations. We have used the following approaches:</p> <ul style="list-style-type: none"> <li>• Request for proposals for water resources in the Official Journal of the European Union (OJEU)</li> <li>• Bilateral discussions with other water companies</li> <li>• Discussion with business organisations</li> </ul> <p>We continue to have 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.</p>

**Table S - 2 Overview of feedback from statutory and non-statutory consultees**

- S.33 We sent a letter to over 200 stakeholders at the beginning of July 2022 to raise awareness of the draft WRMP24 - its purpose, the work completed to date, the main changes since WRMP19 and the consultation on the draft WRMP planned for November 2022. The letter is provided in Annex 3.
- S.34 We have also held on-going engagement with regulators and stakeholders on the strategic resource options, details of the specific engagement and how it has shaped the work is presented in the Gate 2 reports<sup>9</sup> for each of the options.

<sup>9</sup> SRO Gate 2 reports for the TW SROs will be published on 14 November 2022



## Public consultation

- S.35 We sent our draft plan to the Secretary of State for Environment, Food and Rural Affairs on 3 October 2022 for national security and commercial confidentiality checks and provided a statement certifying that the draft plan did not contain any information that would compromise national security interests or was considered to be commercially confidential.
- S.36 We will require approval from Defra before publishing our draft plan for public consultation, and are planning to start the consultation on 14 November 2022. We intend to run the consultation over a 14-week period, recognising that Christmas falls within the consultation period.
- S.37 We will co-ordinate activity with WRSE, and the other South East water companies, to ensure a clear and joined up programme of activities with clarity of message for all stakeholders.
- S.38 We will raise awareness of the consultation through a variety of channels, write to interested stakeholders and hold events throughout the consultation period to provide the opportunity for stakeholders, and potentially affected local communities, to discuss the draft plan with us.
- S.39 We will undertake research with our customers to ensure we understand their preferences and priorities and can take this into account in the revisions to the draft plan.
- S.40 We will prepare a statement of response following the consultation to set out the points raised in the consultation and our consideration of them, alongside resultant changes to the plan. The statement of response will be published in May 2023 and will be sent to all who participated in the consultation.

## Strategic resource options

- S.41 There is ongoing work to investigate and develop strategic water resource solutions<sup>10</sup> to ensure a resilient water supply. This work is being undertaken under the guidance of the Regulators' Alliance for Infrastructure Development (RAPID), an alliance of water regulators. RAPID introduced a "gated" process which all strategic resource solutions have to follow. The gates are review points to track and formally assess the progress to examine the solutions. For each gate, the activities and deliverables are agreed in advance and based on this information, a decision is made whether a solution is viable and should be progressed to the next stage of activity with confirmation of further funding, or not viable and the work should be concluded.
- S.42 The gate 2 regulatory submissions for the standard strategic resource options<sup>11</sup>, will be submitted to RAPID on 14 November 2022, and will be published at the same time as the publication of the draft WRMP24 for consultation. These submissions will present the feasibility and conceptual design work on the strategic water resource solutions. Interested stakeholders can consider the gate 2 information alongside the draft WRMP24 documentation and respond to public consultation on the draft WRMP24.
- S.43 The decisions on whether or not a solution goes ahead will be made through water resources planning process. The need for solutions, their timings, and the justification for decisions must be presented in the statutory WRMP. It is through the process of preparing, consulting on and finalising WRMPs that decisions will be made on what additional water resource infrastructure is required on a local, regional and national scale. The interaction between the regional planning, statutory company-level WRMP planning process and the gated process for potential strategic water resource solutions is shown in Figure S - 3.

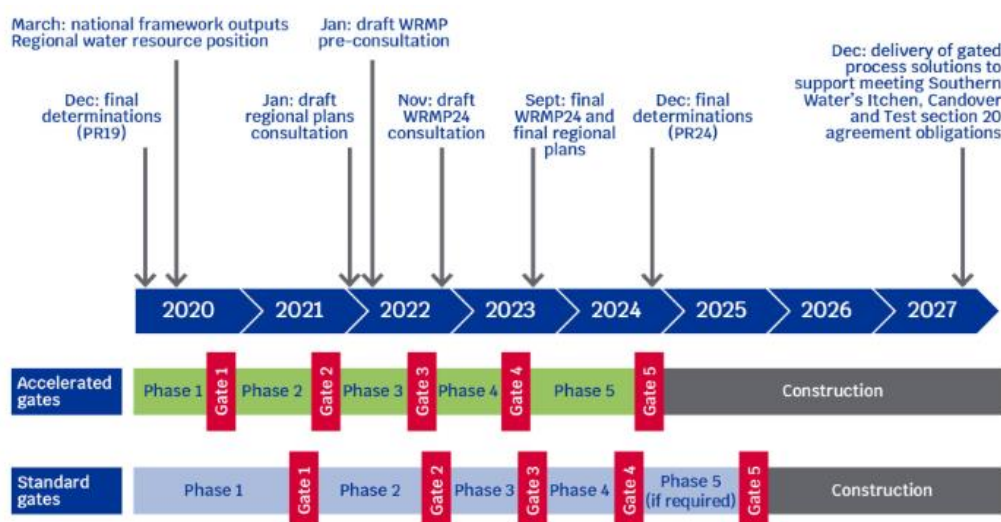


Figure S - 3 Gated process for potential strategic resource solutions<sup>12</sup>

<sup>10</sup> To read about strategic resource solutions go to Section 7

<sup>11</sup> To read about the regulatory gated process and RAPID go to [RAPID - Ofwat](#)

<sup>12</sup> [The RAPID gated process and the proposed water resource solutions - Ofwat](#)



- S.44 If a solution is included in the final WRMP24 it will require planning and environmental consents before going ahead. There are further stages of engagement and consultation as part of these consenting processes.
- S.45 RAPID will undertake a representation period on its draft decisions on the standard gate 2 submissions between 1 March 2023 and 12 April 2023. Representation received by RAPID to the gate 2 draft decisions are not classified as a response to the statutory consultation on our draft WRMP24 but we will review and consider the representations when these are shared by RAPID.

## Annex 1 – Membership of WRSE stakeholder groups

Members of the Stakeholder Advisory Board, the Environment Advisory Group, and the Multi-sector Advisory Group are presented here. Note this is correct as of April 2022.

### **Stakeholder Advisory Board**

Chair: WRSE Organisational Director

Members of each of the sub-groups:

- Multi Sector Group Chair and member
- Environment Group Vice Chair
- CCW - Representative on behalf of the Regional CCG
- Representatives of other key water users
- Local Government representative and GLA

Regulators invited as observers.

### **Environmental Advisory Group**

Chair: WRSE Organisational Director

Members:

- Herts and Middlesex Wildlife Trust
- Blueprint for Water
- Environment Agency
- Natural England
- Chalk Streams First
- Water company environmental leads

### **Multi-sector Advisory Group**

Chair: Kent County Council (following retirement now independent)

Members:

- NFU
- RWE
- Uniper Energy
- DS Smith
- Confederation of Paper industries
- BIGGA / England Golf
- West Sussex Growers

- Mineral Products Association
- Canal and Rivers Trust
- Environment Agency
- Vitacress
- Energy UK

## Annex 2 – Overview of engagement to inform the development of the South East plan

Date	Stakeholder group/activity	Agenda/Discussion topics
2020		
February (13)	Stakeholder Advisory Board (SAB)	Update on the National Framework, WRSE forward plan and future water resource requirements.
February	Thames Water & Affinity Water Water Resources Forum	Overview of national and regional planning; Strategic Water Resource options and Focus on the environment
June (18)	Stakeholder Advisory Board (SAB)	Update on WRSE programme; Engagement framework and policy assumptions
June (18)	Resilience Framework webinar	Presentation and Q&A on the Resilience Framework
June	Regional CCG	Introduction and terms of reference
June	Thames Water & Affinity Water Water Resources Forum	WRSE – what we've done and what's ahead; WRSE – working with you; How do we make sure the regional plan is resilient – Resilience Framework
July (7)	Environmental Advisory Group (EAG)	Objectives and terms of reference; Resilience Framework consultation
July (30)	Multi-Sector group (MSG)	Resilience Assessment: How we develop non-PWS elements
August (7)	Method Statements overview webinar	Presentation and Q&A on the method statements
August (10)	Regional policies webinar	Presentation and Q&A on the regional policies
August (25)	Growth Forecasts webinar	Presentation by Edge Analytics on the method used to develop the growth forecast
August (26)	Multi-sector group (MSG)	Multi-sector approach method statement; Vulnerability assessment; Regional connectivity model
September	Thames Water & Affinity Water Water Resources Forum	Setting our environmental destination Deciding on a Best Value plan What options are we looking at?
September (10)	Option appraisal webinar	Presentation and Q&A on the options appraisal method
September	Regional CCG	Best Value Planning Phase 1 customer research - update
September (15)	Environmental Advisory Group	Terms of Reference How outputs feed into WRSE 'process' Catchment workshops – what's coming up WRSE Environmental method statements - feedback Plan of how outputs from group are translated into action.
September (28)	Multi-sector group	Trading experiences – five examples of different trading experience presented by group members
October (5)	Regional CCG	Phase 1 customer research update

Date	Stakeholder group/activity	Agenda/Discussion topics
October (13)	Stakeholder Advisory Board (SAB)	Regional policies consultation Best Value Plan – criteria and metrics Customer research update
October (13)	Environmental Advisory Group (EAG)	Chalk Streams Catchment Workshops - update Workshop on SEA Scoping Report
October (16)	Environmental Ambition webinar	Presentation and Q&A on environmental ambition
October (26)	Regional CCG	Update on Phase 1 research – fieldwork
October	Catchment workshops (4)	Workshops in partnership with Atkins and The Rivers Trust to introduce the online catchment tool and invite stakeholders to contribute issues and ideas
November (12)	Multi-sector group	Options workshop Resilience Framework
December (11)	Environmental Advisory Group (EAG)	National Framework - guidance Resilience and the 25 YEP Best Value Plan – pre-consultation discussion
December (12)	Regional CCG	Phase 1 customer research update
December (16)	Multi-sector group	Non-public water supply (non-PWS) demand forecast Resilience Framework update Environmental Destination – presentation by the EA on updated environmental scenarios
December	Thames Water & Affinity Water Water Resources Forum	Looking at potential options Developing a best value plan – discussion
2021		
January (20)	Multi-sector group	Review of non-Public Water Supply (PWS) demand long-term forecast, review of potential impact of updated EA forecasts on abstraction.
February (12 & 16)	Best Value (BV) Plan consultation webinar	Presentation, discussion and Q&A on the BV Plan objectives, criteria, and metrics to support the consultation
February (22)	Stakeholder Advisory Board (SAB)	Introduction to refreshed terms of reference and work programme; update on the BV planning approach.
March (2)	Environmental Destination workshop –regulators and EAG technical advisors	EA presentation on proposed abstraction reduction scenarios and application of this; Development of catchment portfolios.
March (8)	Environmental Advisory Group (EAG)	Focus on environmental destination; BV planning – criteria and metrics; Catchment options and delivery mechanisms
March (17)	Multi-Sector group (MSG)	Overview of position for each sector
March (25)	Thames Water & Affinity Water Water Resources Forum	Best Value planning consultation – feedback – next steps for engagement with customers

Date	Stakeholder group/activity	Agenda/Discussion topics
		and stakeholders; update on South East planning challenge
May	Future Water Resource Requirements	Publication setting out the planning challenge for the SE
May (18)	Stakeholder Advisory Board (SAB)	Workshop to consider the engagement with customers and stakeholders on alternative plans and the development of an interactive tool to clearly communicate the information.
May/June	Options - overview of the options considered in the South East plan	Series of workshops organised by option type to showcase the range of options under consideration and provide an opportunity to discuss and comment on the options.
May	Agriculture/horticulture working group	Review of opportunities for shared options with agricultural and horticultural stakeholders
June	Multi-Sector (MS) group	Update on the modelling work and discussion on the next steps for agriculture/horticulture shared options
July	Webinar for Retailers	Focus on the company drought plan consultations and introduced the regional plan
September	Environmental Advisory Group (EAG)	Focus on the environmental destination for the South East
September	Agriculture/horticulture working group	Ongoing discussion on opportunities for shared options with agricultural and horticultural stakeholders
September	Multi-Sector (MS) group	Update on the modelling work and discussion on the next steps for agriculture/horticulture shared options
September	Regional reconciliation webinar	Recap on role of regional planning, overview of reconciliation process and updates from regional groups
October	Stakeholder Advisory Board (SAB)	Focus on the adequacy of the approach to ensure stakeholder and customer views are considered in the development of the plan.
November	Horticultural Trades Association	Briefing on the emerging plan
November	Council for Protection of Rural England (CPRE)	Briefing on the emerging plan
November	Thames Water & Affinity Water Water Resources Forum	Update on work to develop the regional plan, with a focus on the SROs
December	National Farmers Union (NFU)	Briefing on the emerging regional plan
December	CCW	Briefing on the emerging regional plan
December	Blueprint for Water	Briefing on the emerging regional plan
December	South East Rivers Trust	Briefing on the emerging regional plan
2022		

Date	Stakeholder group/activity	Agenda/Discussion topics
January	National Infrastructure Commission	Briefing on the emerging regional plan
January (13)	Oxfordshire County Council & Vale of White horse District Council members and officers	Pre-consultation briefing event
January (17)	Wide stakeholders > 270 attendees	National Framework led webinar on the national water resource picture including a summary of each regional group's regional plan.
January (20)	Wide stakeholders > 160 attendees	Launch of the consultation on the emerging regional plan for the SE
January (31)	Wide stakeholders	SE (West region) launch webinar
February (1)	Wide stakeholders	SE (East region) launch webinar
February (2)	Wide stakeholders	SE (North region) launch webinar
March (1)	Wide stakeholders	Live consultation Q&A
March (1)	Stakeholder Advisory Board (SAB)	Discussion on the consultation feedback and next steps
March (3)	Environmental Advisory Group (EAG)	Environmental ambition & prioritisation
March (5)	Community Drop-in, Steventon, Oxon	A drop in event to enable the local community to engage with TW, Affinity and SESRO team
April (28)	Environmental Advisory Group (EAG)	Overview of updated environmental ambition for all South East companies
May (20)	Environmental Advisory Group (EAG)	Ongoing discussion on environmental ambition and prioritisation
June (7)	Thames Water & Affinity Water Resources Forum	Overview of responses to the consultation and work to transition to the best value regional plan
July (11)	EAG, SAB and MS Group joint workshop	Review alternative programmes to inform the preferred draft plan for consultation

## Annex 3 – Pre-consultation letter sent to all statutory and non-statutory consultees plus interested parties, July 2022



### Thames Water's Draft Water Resources Management Plan 2024

Hello,

We are developing our next Water Resources Management Plan (WRMP) which will cover the 75-year period from 2025 to 2100. Our plan will reflect the Water Resources South East (WRSE) regional plan and will set out the actions that we intend to take to ensure that we have a sufficient supply of water to meet the needs of our customers in the long term while ensuring that enough water is left to protect the environment, taking into account challenges such as population growth and climate change.

We have a duty, under Section 37A-37D of the Water Industry Act 1991, to prepare and maintain a Water Resources Management Plan. Our current plan, WRMP19, was approved for publication by the Secretary of State for the Environment, Food and Rural Affairs in March 2020. You can read this plan [here](#)<sup>1</sup>. We update our plan every five years to ensure that it remains up to date, including updated forecasts and ensuring that our plan meets the requirements of any new policies set by the government.

We will submit our draft plan to Defra by 3<sup>rd</sup> October 2022 and expect to publish it in November, following national security and other checks, for statutory public consultation. Feedback from the public consultation will be taken into account in the development of our revised draft plan.

Working as part of WRSE, we have been engaging with a wide range of stakeholders throughout the development of the best value plan for the South East, and the regional plan will be the foundation of our draft WRMP. As we continue the work to develop the regional plan, and our draft plan, ahead of consultations in the Autumn, we welcome any comments that you have by Lesley Tait (Email: [Lesley.tait@thameswater.co.uk](mailto:Lesley.tait@thameswater.co.uk)).

#### Water Resources Management Planning

We are required to follow the [Water Resources Management Plan Regulations 2007](#)<sup>2</sup> and the [Water Resources Planning Guideline](#)<sup>3</sup> when preparing our plan. The Water Resources Management Plan Regulations 2007 set out the legal requirements of the plan and the process that we must follow when producing it, while the Water Resources Planning Guideline sets out in more detail the factors that we should consider and the methods that we should use. We must also follow Directions issued to us by Defra.

#### Key Changes Between WRMP19 and dWRMP24

Our WRMP19 set out that, without intervention, our customers would experience a level of drought risk which is greater than our desired Level of Service. In order to mitigate this risk, the plan set out the following key features:

- Demand management: in the short to medium term, we committed to reduce leakage and help customers reduce their water consumption. This involved finding and fixing leaks, rehabilitating water mains, and continuing to roll out our Progressive Metering Programme (PMP), resulting in 15% leakage reduction by 2025, a 50% reduction in leakage over the longer term, and most households being metered by 2030.

<sup>1</sup> <https://www.thameswater.co.uk/about-us/regulation/water-resources>

<sup>2</sup> <https://www.legislation.gov.uk/uksi/2007/727/contents/made>

<sup>3</sup> <https://www.gov.uk/government/publications/water-resources-planning-guideline/water-resources-planning-guideline>

- Water recycling: we intended to develop a water recycling scheme in North London, providing London with around 50 million litres per day by 2031.
- South East Strategic Reservoir Option (SESRO): we set out the need for a reservoir to secure long resilience in the South East, being delivered in 2037/38. The reservoir was intended to bring around 200Mld of supply capability for our customers, and a further 100Mld of supply to Affinity Water.
- Severn-Thames Transfer (STT): in the longer term (2080s), dependent on future uncertainties, a supported Severn-Thames Transfer was set out as being needed.

Several key documents, notably the National Infrastructure Commission report [Preparing for a Drier Future](#)<sup>4</sup> and the [National Framework for Water Resources](#)<sup>5</sup>, have been published which have led to changes in the way that we plan, and the requirements that we must meet. The key changes to planning processes and requirements are:

- **Introduction of Regional Water Resource Planning:** The National Framework for Water Resources set out the requirement that water resource plans be developed at a regional level (as opposed to the existing approach of company WRMPs being developed in isolation), with regional plans being reflected in water company WRMPs. We are a member of the WRSE regional group, and our WRMP will reflect the South East (SE) plan. The development of the SE regional plan has involved the development of methods, models, and datasets which are consistent across the region, leading to a far greater level of alignment. In some cases, the use of these methods and/or datasets has required us to change the methods that we applied in developing WRMP19.
- **Drought Resilience:** Our current Level of Service is that we would not impose emergency water use restrictions (such as standpipes) more often than once every 100 years. We are required to improve our level of resilience such that we would not impose emergency restrictions more often than once every 500 years by 2040 at the latest (although we should explore the cost implication of delaying this). We will also improve to a 1 in 200-year Level of Service in the early 2030s, and are investigating the best option(s) that can be delivered to enable this.
- **Licence Reductions:** Our WRMP19 set out licence reductions, for the benefit of the environment, which were deemed likely to be needed prior to 2030, and included scenarios of further licence reduction in the future. For WRMP24 we must take account of two new factors relating to licence reductions:
  - A 'licence capping' policy has been introduced by the Environment Agency (EA) whereby, in order to offset the potential risk of deterioration, some licences may be capped at abstraction volumes that have previously been used (an interpretation of requirements set out in the Water Framework Directive).
  - The Environment Agency has introduced guidance around the derivation of an "Environmental Destination" and set out scenarios to be considered in the National Framework for Water Resources ([Appendix 4](#)). The guidance focuses on the development of profiles of licence reductions that could be necessary up to 2050. Potential future sustainability reductions are the largest single potential impact on our future supply-demand balance, and also present the largest uncertainty in our planning. Scenarios of Thames Water licence reductions in our dWRMP24 range from around 100 Mld to over 500 Mld in the long-term. We will need to undertake a significant volume of investigations

<sup>4</sup> <https://nic.org.uk/studies-reports/national-infrastructure-assessment/national-infrastructure-assessment-1/preparing-for-a-drier-future/>

<sup>5</sup> <https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources>

<sup>6</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/872344/Appendix\\_4\\_Longer\\_term\\_environmental\\_water\\_needs.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872344/Appendix_4_Longer_term_environmental_water_needs.pdf)



to determine those licence reductions which would result in ecological benefit, in order to determine which reductions we should plan to implement.

- **Leakage Reduction:** Direction from Defra has highlighted that we should set out how we will reduce leakage by 50% from 2017/18 levels, by 2050.
- **Household Consumption Reduction:** Government expectations are that water companies contribute to the national target of achieving 110 l/h/d per capita consumption by 2050.

In addition to the points set out above, our dWRMP24 includes two other significant changes:

- **Rejection of Deephams Water recycling (previously referred to as Effluent reuse) scheme as an option:** Following further investigation and consultation with the EA, environmental risks have been identified which have led us to reject the Deephams Water recycling option for dWRMP24. As highlighted above, Deephams Water recycling was an option that we intended to deliver by 2031 to deliver 1 in 200-year resilience to drought. As such, we will need to determine which alternative option(s) presents the best value approach to reaching a 1 in 200-year level of drought resilience with the earliest practical delivery date.
- **Greater focus on adaptive planning, and best value planning:** Our WRMP19 was a Best Value Plan which incorporated adaptive planning techniques. Our dWRMP24, and the WRSE Regional Plan, will utilise these techniques more heavily.

#### Emerging Plan

In January 2022, WRSE published its "Emerging Regional Plan for South East England". This gave early sight of the big issues and emerging solutions to gain initial feedback from stakeholders. It was a step in an ongoing process of plan development, and not yet a formal preferred plan. From Thames Water's perspective, the most salient parts of the emerging plan were:

- **Demand reduction:** The largest component of our plan in the short to medium term is still demand reduction. Our plan results in a reduction in demand of around 250 million litres per day in London alone, by 2050. This level of demand reduction is expected to be maintained in our dWRMP24 and is driven by substantial reductions in leakage (15% by 2030 and 50% by 2050) and ongoing roll out of our smart metering programme supported by awareness and engagement with customers.
- **Water recycling:** The emerging plan identified the Beckton Water recycling option as being the option which would increase our customer's level of protection from drought to 1 in 200-years. We are working to determine which option(s) present the best value solution to providing a 1 in 200-year level of resilience, with the Deephams scheme having been ruled out on environmental grounds.
- **SESRO and STT:** The emerging plan identified that, in order to provide a 1 in 500-year level of service and meet severe future licence reductions, both the STT and SESRO strategic resource options may be required. Since the emerging plan was published, we have been working to improve the approaches taken in adaptive planning and may find that we don't have a need for both options in all potential future scenarios. SESRO and STT would be needed to provide supply both to Thames Water customers as well as Affinity Water and Southern Water customers, via the Thames to Affinity Transfer and Thames to Southern Transfer schemes respectively.

The WRSE emerging plan set out a cost efficient approach to the planning problem of providing water to the South East of England. Our WRMP24 and the revised WRSE plan will present a best value approach, considering factors beyond only cost.

#### Next Steps

We are currently working to produce a Best Value Plan for the South East region with WRSE.

We have an established programme of engagement with stakeholders, including discussions, webinars and consultations held with WRSE and via our Water Resources Forum co-hosted with Affinity Water. We will continue to work openly and transparently with stakeholders.

As mentioned previously, we will be publishing our draft plan in late 2022, and will be holding a public consultation during late 2022 and early 2023. The revised WRSE best value regional plan will also be published at around the same time as our dWRMP24, and this plan will also be consulted on.

We welcome your participation in the consultation on our draft WRMP24. If you have any comment or feedback that you would like to raise on the approach that we are taking to producing our dWRMP24 ahead of the consultation please email Lesley Tait (Email: [Lesley.tait@thameswater.co.uk](mailto:Lesley.tait@thameswater.co.uk))

Best regards,

Tony Owen,  
Head of Water Resources  
Thames Water  
Date: July 2022

Thames Water Utilities Limited, a company registered in England and Wales with company number 0236661.  
Registered office address: Cleaver Court, Vauxhall Road, Reading RG1 8DB. VAT registration number: GB 937 4569 15.

