Thames Water Water Resources Management Plan 2024

Appendix DD - Minor Amendments Made Following Issues Raised in Annex to Defra Request for Information

October 2024

In February 2024, Defra requested more information to support our Water Resources Management Plan 2024 (WRMP24). Our response to that request, and the changes made to our plan as a result, are detailed in an Appendix to our Statement of Response.

Accompanying the request made in February 2024 was an Annex. In the Annex, further information was set out regarding the Issues raised in the letter, and additional issues were raised which did not feature in the Defra request. The advice given was that the additional issues should be addressed in our final plan, but were not material to the approval of our WRMP24.

In this Appendix, we have identified items raised in the Annex, and have responded to them by stating our consideration the items raised, and changes made to the plan as a result (or, if no changes have been made, why not). We have considered all of the points raised in the Annex to the Defra Request for Information. In this Appendix we present a table in which we set out the points raised in this Annex. The amendments made to our plan set out here are not substantive, and are primarily presentational.

In this Appendix, we have categorised items raised according to the categorisation used in the Annex sent to us by the Environment Agency:

- Issue [number]: Points raised in the Annex which are raised in relation to the Issues raised in the Defra letter, but which were not directly referenced in the Issues.
- Issue OR[number]: Points raised by the Environment Agency in the Annex, related to previous EA recommendations, which are not related to Issues raised in the Defra letter
- Issue OF[number]: Points raised by Ofwat in the Annex which are not related to Issues raised in the Defra letter
- Issue NE[number]: Points raised by Natural England in the Annex which are not related to Issues raised in the Dera letter
- Improvement [number]: Points raised by the Environment Agency for improvement of the final WRMP24
- Stakeholder [number]: Points raised by stakeholders in the dWRMP24 consultation which the Environment Agency have identified as requiring further action before the final WRMP24

In this document we have not responded to points raised in the Annex where they have been answered in response to the Issues raised in the Defra letter (see Statement of Response Appendix – Defra Request for Information).

In many cases, multiple issues/points are raised within an underlying topic. Where this is the case, we have split the Environment Agency's points into further sub-points in order to limit the breadth of response required regarding individual points raised. This means that, in some cases, we have copied text from the Environment Agency's representation multiple times. In some cases we have amended the sentence structure where we have split consultation points raised into multiple points, but we have not changed the meaning of any points raised.

Point Reference	Text from EA Annex	Our consideration	Changes to the revised draft WRMP24, or if no changes are made, why not
Issue 1: Provide greater confidence to the regulators that the company is managing the risks identified at the beginning of the planning period			
Issue 1.1	Thames Water should consider other options to reduce per capita consumption, and provide justification for not upgrading non-household meters to smart meters, as these improve water efficiency and reduce leakage for non-household customers (related to previous recommendation 3.3)	In our dWRMP24, rdWRMP24, and fWRMP24, non-household meter upgrades formed/form a key part of our demand plan. As they form a core part of our plan, we do not need to provide justification for not upgrading them. In our final WRMP24, it is set out that we plan to upgrade more than 100,000 NHH smart meters in AMP8. A similar number of NHH meter upgrades was included in our dWRMP24 and rdWRMP24 across AMP8 and AMP9. We agree that upgrading NHH meters allows for significant demand savings through water efficiency and CSL fixes and this is why they form a core part of our plan. We consider that we have considered a wide range of options to reduce PCC. The detailed screening and appraisal process for demand-side options is documented in WRMP24 Section 8, as well as Appendices P and Q and Our Demand management options screening report and feasible options report.	Between our rdWRMP24 and fWRMP24, our demand reduction plan has been updated in line with our PR24 submission. Notably, in relation to NHH smart metering, we have accelerated the programme roll-out of NHH smart meters from a 2-AMP programme to a 1-AMP programme.
Issue 1.2	Thames Water should provide clarity for why the High + programme was not taken forward. (related to previous recommendation 2.3)	As explained in Section 8 of the rdWRMP, we have appraised a demand management programme which includes a faster (50% reduction by 2037/38) and larger (40 Ml/d lower leakage by 2050) leakage reduction programme, known as the High+ programme.	To ensure that we have demonstrated that the leakage reduction plan presented is best value, we have added the following text after the current rdWRMP24 Section 11 paragraph 11.27:

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		As is noted on p.13 of Appendix B of our Statement of Response (Response to Ofwat representations), this programme would involve an additional c.£2.7bn of expenditure on leakage reduction efforts for the delivery of only an additional 40 Ml/d and would require relying on as-yet unknown leakage reduction techniques to a greater degree (as per Tables 8-58 and 8-59 in the rdWRMP), as well as requiring more mains rehabilitation (3,800km of mains rehabilitation for leakage reduction purposes in our preferred plan as opposed to 5,800km in the "High+" programme). As per paragraph 11.27 of our rdWRMP24, further leakage reduction above the programme included in our WRMP24 is therefore, cost prohibitive. The cost and carbon emissions associated with these programmes are shown in Tables 5a and 5b, with the "High+" programme clearly resulting in significantly greater costs and carbon emissions.	*Adopting the "high plus" leakage reduction programme would deliver an additional 40 Ml/d of leakage reduction for an additional £2.7bn by 2050. This is expensive in comparison to new supply options, and so we do not consider that additional leakage reduction beyond what is in our plan would represent best value to our customers. Furthermore, this plan would rely on as-yet unknown leakage reduction techniques to a greater degree (as per Tables 8-58 and 8-59 in the rdWRMP), increasing deliverability risks of our plan.*
Issue OR1 – Licence capping			
Issue OR1.1	There are issues with the capping volume and conditions for the company's New Gauge source. Further discussion and clarification is required for the list of licences, and approaches proposed for licence capping in a number of catchments. The list of licences, and approach for licence capping should be	We acknowledge that Thames Water and the Environment Agency have obligations pertaining to the Water Environment (Water Framework Directive) Regulations 2017. We also acknowledge that the Environment Agency has interpreted the requirements of this legislation into policy and guidance, with the policy known as the "licence capping policy".	In the bulleted list following paragraph 5.61 of the rdWRMP24, we will replace the text "Cap the New Gauge source's annual licence at a level equal to the maximum annual abstraction over the period 2010-2020" with the text "Cap the New Gauge source's annual licence at a level equal to the average annual abstraction over the period 2010-

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	fully agreed with the Environment Agency Area Offices. Thames Water should ensure that the reduction at New Gauge is made to the average annual licence volumes (not max annual) over the 2010-2015 (April 2010 – March 2016) level. This is identified by Thames Water as 84.62Ml/d. Thames Water should also make clear that that the agreement was for a S20 agreement to be used only in a 1:200 drought, not normal drought conditions. It would also only apply to an increase at the Northern New River Wells up to the maximum annual abstraction over the period 2010-2020 and not a change to New Gauge. It is not clear if the list of licences proposed for caping in EA Thames Area is complete. Thames Water should work closely with the EA Thames Area Office to build the full list of licences for capping, agree an approach to determine the volume of capping, and update the licence capping chapter of the WRMP24 before the plan can be progressed to final for publication. Thames Water should continue to work closely with EA HNL Area offices to agree the approach for licence capping in the Upper Lee catchment, and report progress in Annual reviews of WRMP24.	Regarding the HNL area licence capping point, as per the proposal communicated between Thames Water and the Environment Agency, the proposed actions are: - To carry out abstraction reductions at the Northern New River Wells (capping to the Max Annual Peak abstraction (Apr 2010-March 2020) - To carry out abstraction reductions at New Gauge (capping at Recent Annual Average (Apr 2010 - March 2016) and - To enter a Section 20 agreement to manage the remaining risk of deterioration by setting an aggregate annual limit across the NNRW and New Gauge limiting abstraction to the total Recent Annual Average (Apr 2010 - March 2016). The Section 20 agreement would also set out that under severe drought conditions the aggregate limit would be removed to allow the 1:200 DO to be achieved. Discussions regarding the specifics of the licensing implementation are still ongoing. Additionally, discussions regarding other licence reductions in the Lee Valley, in particular the Enfield group, are ongoing and may influence the specific implementation of licence changes in the Lee Valley in mitigating the risk of deterioration. Regarding Thames Area licence capping, in some cases capping some licences will not have Deployable Output impact (capped licences being above current Deployable Output) values. In other	2016". In the same bulleted list we will replace the text present with "This limit would be lifted under severe drought conditions, in order that the 1 in 200-year DO of the system can be achieved. In this case we would be able to abstract the annual licensed volume for each source." In a new paragraph following the current paragraph 5.63, we will include the following text "Discussions regarding the specific triggers and licensing implementation of this proposal are ongoing and may be impacted by the AMP7 WINEP action related to right-sizing the licences for the abstractions into the Lee Valley Reservoirs. The triggers in the Section 20 agreement would need to be implemented before a "1 in 200-year" event is confirmed but would only be implemented in "severe drought" conditions. In order to mitigate outstanding risk, hydromorphological improvements have been included in our AMP8 WINEP programme for the Lee Navigation (Hertford to Fieldes Weir) and River Ash (from confluence with Bury Green Brook to Lee) waterbodies."

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		cases, outstanding investigation/options appraisal work is underway. We will continue to communicate with EA colleagues in all areas to agree the approaches to be taking in licence capping.	We have added text (paragraph 5.68 and associated bulleted list) to document licences which may be subject to the licence capping policy, but which have not had a DO reduction associated with them in our plan. We have also added text (paragraphs 5.55 and 5.77) to describe the ongoing process of analysis and engagement regarding licence capping.
Issues OR2 SEA – Ambiguity over the identification of effects and the omission of transboundary effects within the SEA			
Issue OR2.1	The summary narrative in section 5.4 (supply side options) refers to effects pre mitigation. It is unclear, however, if the summary of the SEA assessment presented in Table 5.3 is pre or post mitigation. The summary of the SEA assessment in Table 5.3 could be clarified to detail whether this is pre or post mitigation in the table heading. The same comment is also applicable to similar SEA assessment summary tables presented for demand management and drought options (Table 3) and catchment management options (Table 5.6). We also recommend the formatting of the tables are checked for numbering and some of the columns appear out of line.	We can confirm that all assessment tables present post mitigation scores, and pre-mitigation scores can be found in each assessment sheet. The assessment sheets are available to customers/stakeholders upon request. Section 4.3 states that “The metrics were based on the option post-mitigation (residual effects) results...”. However, we acknowledge that additional details could be added to improve the clarity of our tables, ensuring the scores clearly reflect post-mitigation results.	To improve clarity, we will update the titles of Tables 5-3, 5-5, 5-6, and 7-3 to include “post-mitigation.” Additionally, to ensure consistency across the document we will include the following text "... These represent the post-mitigation or residual effects." And where relevant “Any pre-mitigation scores can be found in assessment sheets within Annex F (on request as excel files).” in the introductions of Sections 5.4, 5.5, 5.6, 6.4, 6.5, and 7.2. We will also review and correct the formatting of the SEA tables, ensuring that the numbering is accurate, and the columns are properly aligned.

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Issue OR2.2	Chapter 7 (Best Value Plan) focuses on the cumulative assessment of the BVP. An overarching SEA options summary table of the BVP (situation 4) (Table 4) is included within Section 7.2. As per chapter 5 it is unclear if the tabulated summary of the SEA is pre or post mitigation. It is recommended the company clarify whether Table 4 the tabulated summary of the SEA is pre or post mitigation in the table / heading.	We can confirm that post-mitigation scoring is included in the SEA assessment of options in preparing the WRSE and TW plans. These post-mitigation scores have been used in the WRSE investment modelling to develop the draft, revised draft and final best value plan. In all the assessment summary tables, the term 'residual' indicates that the results presented are post-mitigation. In Sections 4.2, 4.3, and 5.7, the phrase 'residual effects (post-mitigation)' confirms that 'residual' refers to the effects remaining post-mitigation. We acknowledge that additional details could be added to improve the clarity of our tables, ensuring the scores clearly reflect post-mitigation results.	As suggested, we will add the wording "(post-mitigation)" to the table headings in Chapter 5 and Chapter 7. And to improve clarity of the tables, we will add to the text narrative in Sections 7.2, 6.4 and Section 5.4 to provide further clarity that the scores are post-mitigation.
Issue OR2.3	In chapters 6 and 7 as part of the SEA summary against the SEA objectives a small summary table is included on the residual construction (positive/negative) and residual operational effects (positive/negative). It is not clear how these smaller tables have been derived. This would provide added clarity to how these SEA topic based summaries link to the SEA options summary tables. The company could explain in chapters 6 and 7 how the smaller tables have been derived in order to provide added clarity	These tables show cumulative plan scores against the SEA objectives. They were derived from reviewing the plan's individual selected option scores and wider elements of the plan such as the environmental destination to form a 'whole plan' assessment. In response to your suggestion to clarify how the tables in Chapters 6 and 7 were derived, additional wording will be included in Chapter 4, where the assessment methodology is explained. This will further demonstrate how cumulative effects (i.e., the assessment of the plan as a whole) were assessed to inform the tables.	In Section 4.4, we explain how cumulative effects are undertaken (i.e., how the assessment of the plan is conducted) and how this leads to the development of an overall 'plan' score for each SEA objective, which is presented in the tables of Chapters 6 and 7. We have included this additional new wording is included to clarify this *"The cumulative effects assessment used professional judgement to determining effects and scoring. This was based on reviewing the individual selected option assessments and scores, combining with other plan*

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	to how these SEA topic based summaries link to the SEA options summary tables.		*components such as the environmental destination and demand management options to determine an overall 'plan score' for each SEA objective. Cumulative effects were identified where options were in close geographical proximity to each other and where construction periods overlapped and where the same receptors were affected by more than one option e.g. the same waterbody with multiple options abstracting or discharging to it. Cumulative effects assessments were also undertaken for each alternative plan (the LCP and BESP)".*
Issue OR3 SEA – Temporal and spatial scope of the SEA			
Issue OR3.1	Temporal and spatial scope of the SEA. The suggestions made are for further clarity. In Chapter 4 (Assessment Methodology), there is a statement (section 4.2) that 'the geographical scope of the SEA covered the Thames Water supply area and was extended to cover options that went beyond the Thames Water area and to cover transboundary effects'. The application of variable Zones of Influence (ZoI) to different receptors is also referred to, however, the ZoIs are not defined within the main SEA environmental report. It is unclear where	To expand on our statement regarding the geographical scope of the SEA in Section 4.2, which extends beyond Thames Water's boundary, we will explicitly outline these options and their respective geographical locations in Section 4.2. In some cases, geographical Zones of Influence (ZoI) were used, while in others, such as designated sites, a combination of distances and pathway ZoIs were applied. We will enhance the existing paragraph in the ZoI section of Section 4.2, and, in response to the suggestion for further clarity, we will provide the ZoI for each SEA objective by including a new column in Table 4-2	To provide further clarity to the options that extends past beyond Thames Water's boundary we will add the following text to Section 4.2 *"The geographical scope was extended to cover the River Severn to River Thames Transfer (STT) strategic resource option , which extended into Wales, and the Oxford Canal option , which extended up to the Birmingham area. Transboundary effects outside the boundaries of the Thames Water area were also considered."*

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	these have been included as indicated in the Thames Water response. It would be beneficial if the ZoL for each SEA objective are set out in the main SEA environmental report as part of the assessment methodology.	to indicate the ZoI corresponding to each SEA objective.	Following on from the text above, this additional text to the existing paragraph regarding how we determined ZoI will include *"A variable zone of influence (ZoI) was determined for each topic (see Table 4-2 for receptor ZoIs). Some key receptors and assets were only considered if there was a direct overlap between the option and the receptor/asset (such as agricultural land). The potential for impacts on oOther key receptors and assets, such as community assets, scheduled monuments, listed buildings and registered parks and gardens wereas considered withinbased on a 500m ZoI of the option (works) location in the assessment. The exceptions to this were European and National ecological designated sites, such as SPAs, SACs, Ramsar sites, and SSSIs, which were considered by identification of potential impact pathways from the option to the receptor, based on qualifying species and habitats and potential hydrological connections."* We will also add an extra column to Table 4-2 titled "Zone of Influence" to set out the ZoI to its corresponding SEA objective as suggested in Section 4.2.
Issue OR4 SEA – Effectiveness of the mitigation and monitoring measures of the SEA			

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Issue OR4.1	Chapter 8 sets out mitigation measures, enhancement opportunities and monitoring proposals. Section 8.1 and Table 8.1 set out detailed mitigation measures and monitoring for options included in the BVP, these draw on the findings of the SEA as well as the other environmental assessments. There is a lack of clarity in the main SEA environmental report on who is responsible for implementing the proposed mitigation and monitoring. For example, it is unclear if the general monitoring proposals will be incorporated as part of the monitoring plan for the WRMP24 and reviewed for adaptive planning, and therefore are the responsibility of the company. It is also unclear if monitoring and mitigation for options is the responsibility of project teams (CEMPs are referred to in Table 8.1). It is unclear what additional information has been included on proposed thresholds or triggers and the type of remedial actions that might be appropriate. The company should clarify in the main SEA environmental report who is responsible for implementing the proposed mitigation and monitoring. The company should clarify where relevant	Mitigation and monitoring will primarily be the responsibility of Thames Water through the further development of projects, though some general mitigation is likely to be carried out by contractors. To highlight who is responsible for implementing the proposed mitigation and monitoring an additional column will be added to Tables 8. To address the point on providing further clarity on general monitoring proposals and measures, we will expand the narrative and add more detail on the environmental monitoring plan and mitigation measures. Further studies have taken place since the rdWRMP to help further determine potential for effects, revise triggers thresholds and remediation. To reflect these further studies and take on the suggestion for further clarity, new columns will be added to table 8 on thresholds/triggers and potential remedial actions.	Chapter 8 outlines our mitigation measures, enhancement opportunities and monitoring proposals. To outline the addition of further detail on responsibility of implementation, monitoring plan clarity, thresholds/trigger and remedial actions, the following text will be added to the introduction of Section 8.1 "*Thresholds and potential types of remedial action have been included in Table 8-1. These will be refined following completion of the identified further studies and during project-level design. Mitigation and further studies for Gate 3 for SROs are summarised in Section 5.7 and detailed in the Gate 2 reports . Table 8-1 also include mitigation and monitoring for the identified potential cumulative effects of the BVP."* To provide additional context on the general monitoring plan we will include the following new text in Section 8.1. *"The environmental monitoring plan is not incorporated as part of the overall WRMP monitoring plan. Instead, ecological and environmental monitoring will be conducted for individual options. However, in the overall WRMP monitoring, we will track the feasibility of the scheme. If the*

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	and in the detailed option summary in Table 8.1 what additional information has been included on proposed thresholds/triggers and the type of remedial actions that might be appropriate.		*ecological or environmental assessment indicates that it is not feasible, we will adapt our plan."* Additionally, the following new column's titled "Responsibility", "Thresholds/Triggers" and "Potential types of Remedial Actions" have been added to Table 8-1 and a new column titled "Responsibility" has been added to Table 8-4.
Issue OF15 Quantitative demand targets & ambition analysis – Business demand			
Issue OF15.1	Ofwat notes on business demand: •Thames Water proposes to deliver a 9% reduction in business demand by 2037-38 in its narrative. However, the data tables indicate a marginally lower level of 8.9%. • The company proposes a low level of reduction in the 2025-30 period however it also proposes to deliver significant benefits form its NHH efficiency programme. These are principally used to overcome the impact of growth in the region. It does not appear all of the improvements have been captured in the business demand forecast. Thames Water should: - ensure all benefits of its demand reduction activities have been accounted	Our fWRMP24 sets out a 9% reduction in Non-household demand from 2019-20 to 2037-38, and a 15% reduction in NHH demand from 2019-20 to 2049-50. NHH demand in 2019-20 was 457.2 Ml/d. NHH demand in 2037-38 is forecast to be 399.65 Ml/d (13% reduction). NHH demand in 2049-50 is forecast to be 378.55 Ml/d (17% reduction) . All values have been taken from fWRMP24 Table 2a. We acknowledge that these values have changed between our rdWRMP24 and fWRMP24. We note that we do not agree with the wording that Ofwat uses, "confirms if it intends to deliver … reduction" in Business Demand. The underlying baseline NHH demand is dependent on many factors, including economic growth. Thames Water cannot control many of these factors and should not be held solely responsible for the	Our WRMP Tables have been updated between the rdWRMP and fWRMP, in line with changes made in the Business Plan submission. WRMP Table 2a now shows NHH demand reduction in line with government policy NHH demand reduction targets.

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	for in its nonhousehold consumption profile. - ensure the data tables presented align with its narrative and confirm if it intends to deliver the 9% and 15% reduction targets and any assumptions made relating to delivery of these targets.	aggregate level of Business Demand in our supply area. We do not agree that we have proposed a low level of reduction in AMP8. Our demand management plan for AMP8 includes 29.8 Ml/d of NHH demand reduction activity, a significant volume. This is offset by significant growth that is forecast. All of the elements of the non-household demand reduction programme have been included in our non-household consumption profile.	
Issue NE1: Lack of commentary in SEA and HRA reports on potential impacts on designated sites and/or priority habitats/protected species.			
Issue NE1.1	In such cases Natural England is unable to conclude whether we agree or disagree with the statements made regarding environmental impacts. Further detail about the assessment for each option should be added to support the scores in the summary SEA table. It would be useful to highlight which sections were added in response to Natural England comments so it is simple to distinguish the new information to what was originally there instead of having to cross reference. The River Thames Fobney Transfer option was just used as an example, and there may be others.	Section 4.7 of our rdWRMP24 SEA sets out how the SEA influences the development of the WRMP24. This includes the integration of outcomes from feasible option assessments to refine option designs, the rejection of options based on environmental grounds, the conversion of the SEA into environmental metrics for the investment model selecting the Best Value Plan, and the program appraisal for cumulative effects, mitigation, enhancements, and monitoring as recommended by the SEA. Chapters 5,6 and 7 show how each stage - feasible option assessment, alternatives assessment and BVP cumulative assessments – has informed decision-making and the WRMP. We agree it would be beneficial for further narrative to be added to conclude the influences of these stages.	We have added the new Sections: • Section 5.8 “Influence of Feasible Options Assessment Outcomes” • Section 6.7 “Influence of Alternative Plans Assessment Outcomes” • Section 7.9 “Influence of BVP Cumulative Effects Assessment Outcome” The new sections summarise how these stages have influenced the WRMP development. Where relevant we have added prominent reference to assessment sheets with the wording *“The individual options assessment sheets for options included in the BVP can be found in the*

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		Further detail about the assessment of each option and how they support the scores in the summary SEA tables can be found in the assessment sheets which are available on request. Annex B in the SEA report contains the consultation logs with comments received and how they have been addressed. A new log will correlate the comments made by NE with TW's responses and updates in the WRMP24 will clearly highlight TW's responses to NE's comments.	*SEA assessment sheets Annex F which are available on request."* These sheets support the scores in the summary SEA tables. The new log highlighting which sections were added in response to NE comments will be sent to NE for their review.
Issue NE2: SEA Monitoring			
Issue NE2.1	NE accept that the HRA and SEA are completed at plan level only, and welcomes the updated detail within Annex B. NE expect that there will be more detail at the project scale. NE states that there is still a risk for these schemes and would encourage thorough exploration and detailed monitoring and mitigation at the project level. Thames Water should closely engage the regulators and provide further details at project scale as the monitoring plans develop throughout the AMP.	To address the point on providing further clarity on general monitoring proposals and measures, we will expand the narrative and add more detail on the environmental monitoring plan and mitigation measures. Further studies have taken place since the rdWRMP to help further determine potential for effects, revise triggers thresholds and remediation. To reflect these further studies and take on the suggestion for further clarity, new columns will be added to table 8 on thresholds/triggers and potential remedial actions. We recognise that further detailed monitoring and mitigation is required and will be developed as the options progress, we will reflect this in Section 8.1.	Chapter 8 outlines our mitigation measures, enhancement opportunities and monitoring proposals. To outline the addition of further detail on responsibility of implementation, monitoring plan clarity, thresholds/trigger and remedial actions, the following text will be added to the introduction of Section 8.1 "*Thresholds and potential types of remedial action have been included in Table 8-1. These will be refined following completion of the identified further studies and during project-level design. Mitigation and further studies for Gate 3 for SROs are summarised in Section 5.7 and detailed in the Gate 2 reports . Table 8-1 also*

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			include mitigation and monitoring for the identified potential cumulative effects of the BVP." To add further details on implementing mitigation measures as projects advance and our engagement with regulators, we will include the following new and expanded text in Section 8.1, *"The proposed mitigation measures and the outcomes of further studies and monitoring set out in Table 8-1 will help inform the project-level assessments required during later design stages (e.g. Environmental Impact Assessment). It is recognised that further detailed mitigation and monitoring at the project level will be required and will be developed as the options are taken forward. Thames Water will closely engage with Regulators during project development and provide further details at the project level as the mitigation and monitoring plans are developed."*
Issue NE3: WINEP Schemes in AMP8			
Issue NE3.1	NE is concerned that Thames Water is not committing to the full WINEP scheme in AMP8 Thames Water should agree with the regulators a clear timeline for the	We understand that this response was a reference to the selection a catchment option portfolios. We have not selected catchment portfolio options for delivery in AMP8 in rdWRMP, or fWRMP. This is in large part due to the fact that the options in these catchment portfolios have a low degree of certainty of delivering a Deployable Output gain.	We have not made changes to our plan following this representation as our WINEP plan includes a wide range of measures which will improve the natural environment.

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	proposed schemes which could be phased out/deferred from AMP8.	As per our response to the original representation non our dWRMP, the Colne catchment management portfolio delivered DO benefit for Affinity Water but not Thames Water. Having not included this catchment portfolio option does not mean that we have amended our proposed WINEP programme for AMP8. Our AMP8 WINEP programme includes a wide variety of fish passage and river restoration schemes, investigations, sustainability reduction, INNS measures and more. All of these will improve the natural environment.	The measures in our WINEP plan have not been set out in our WRMP24, as these are separate submissions. We are committed to the delivery of our AMP8 WINEP programme, including the Regional WINEP item.
Improvement 1: Update household and non-household demand forecasts with latest COVID19 modelling or justify why this is not appropriate			
Improvement 1.1	The EA raised this issue in improvement 1.1. Thames Water detailed that it was unable to update the baseline and scenario forecasts with the latest COVID19 modelling due to the ONS changes to GVA invalidating models that were developed. It is not clear what the impact from ONS changes had on the GVA models. This would help stakeholders to better understand why no changes to the demand forecast have been made other than rebasing the demand forecast to the AR22 reporting year. The company should explain why the ONS changes to GVA invalidated the	Published ONS models and data for Gross Value Added (GVA) fundamentally changed between draft and revised draft WRMP submissions. The extent of this change would have required extensive model updates to the non-household demand forecasting model in order to utilise the new data. Whilst it would have been preferable to use the most up-to-date data for modelling, especially with regards to COVID years, the decision was made to not do so, with the understanding that the old dataset was not invalidated by the new. As described in Section 3 of our final WRMP24, we took the decision to re-base our non-household demand forecast to align with levels of non-household consumption seen in the AR24	No changes have been made in response to this point – we maintain that our forecasts are robust, and that updates based on GVA models are currently infeasible.

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	models that were developed for household and non-household demand forecast.	reporting year, and as such consider our forecast to be robust.	
Improvement 1.2	The EA raised this issue in improvement 1.2. We asked Thames Water to provide further information on the assumptions used when considering impacts of COVID19 on demand in its headroom assessment, including changes in volume, location and working patterns, detailing how this has been applied across the planning period. The company has re-based its demand forecast to the AR22 reporting year between the dWRMP and rdWRMP. It has accounted for the impacts of covid on its demand forecasts in its headroom allowance as it is uncertain what the longerterm impacts will be. It details that this allowance will be reviewed as longitudinal data is gathered. The company should continue to gather data on the impact of COVID 19 on demand and provide updates on how it is incorporating this in its demand forecasts through the annual review process.	We agree with the need to continue to gather data on the long-term changes to behaviour following the pandemic, which have driven changes in consumption patterns. As we move into the WRMP24 Annual Review process, we will continue to review data, and will explore what this means for our demand forecast.	We have reflected the best available consumption data in our fWRMP24 by adjusting our forecast in line with data observed in the AR24 reporting year. We will reflect on changes in consumption patterns that we observe in our Annual Review.
Improvement 2: Improve modelling assumptions and explain how the outcomes of the new modelling compares with the company's previous supply model.			
Improvement 2.1	The EA raised this issue in improvement 2.3. It has identified that there are inconsistencies between the supply model assumptions and actual	We acknowledge that our ongoing work into the investigation of the issues experienced in 2022 may result in updates to our modelled representation of our water resources systems.	We have not made changes to our plan as a result of this point. This is a commitment to reporting in our Annual Review of our WRMP.

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	operational constraints for both its London and SWOX WRZs. Details of the actions it aims to undertake have been captured in a revision to the monitoring plan in Section 11 in the revised draft WRMP24. Updates from these investigations may change the future operation of resources and the impact on DO. The company should ensure that it shares the conclusions of investigations as they progress, through the WRMP annual review process, including how these investigations have influenced its ability to manage abstractions flexibly. It should also report on any constraints it has identified that it plans to incorporate into its water resources modelling and the impacts of these on the DO of sources.	We will continue to communicate with the Environment Agency regarding the outcome of investigations, and any changes to our water resources modelling that result.	
Improvement 4: Make improvements to the Strategic Environmental Assessment, including stating how the company has addressed comments from statutory consultees and explaining the methodologies used more clearly.			
Improvement 4.1	4.2 Draft WRMP objectives Thames Water has not detailed the overarching WRMP objectives in its revised WRMP24, which means these are not carried through to the SEA. It is not clear whether the SEA process has identified the right SEA objectives (i.e. against a set of clearly set out plan objectives) and	The primary aim of the WRMP is outlined in Chapter 1 (Introduction and Background) as: *"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".*	We will clearly include the primary aim of the WRMP and the WRMP24 objectives in Section 2.2 of the SEA : "*The primary aim of Thames WRMP24 is 'to ensure that there is sufficient water available to meet anticipated demands, under various weather conditions but in particular in dry and*

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	consequently, all likely significant environmental effects. The EA raised this issue in improvement 4.2. The lack of a clear outline of the main objectives of the plan makes the SEA not fully compliant with point 1 of Schedule 2 of the SEA Regulation. Thames Water should provide a clear list of overarching planning objectives and aims for the WRMP to satisfy the SEA requirements. It should also include the WRMP objectives within the Environmental Report.	The rdWRMP has a set of objectives for the WRMP24 which have been taken from the WRSE BVP objectives (see WRMP sections 1 and 10). However, we acknowledge that this connection could be better reflected in Appendix B - SEA report. To address this we will include a clear list of overachieving objectives and aim to the WRMP24 and will include a new Section 4.2. Section 4.2 will include a table showing the compatibility between the WRMP24 and SEA objectives, along with a clear explanation of the relationship between the two sets of objectives.	*very dry conditions, whilst protecting the environment'.* *The objectives of the Thames WRMP24 are the same as the WRSE BVP objectives which are to:* • *Deliver a secure and wholesome supply of water to customers and other sectors to 2100* • *Deliver environmental improvement and social benefit* • *Increase the resilience of the region's water system (public water supply system, environmental system, and the non-public water supply systems used by other sectors)* • *Be deliverable at a cost that is acceptable to customers"* A new Objectives Compatibility Review table will be introduced in Section 4.2 to address the alignment and compatibility between the WRMP24 objectives and SEA objectives. This section will include the following text: "*It is important that the objectives developed for the Thames WRMP24 are compatible with the SEA objectives. When developing objectives based on environmental, social and economic issues, it is possible that not all objectives will relate*

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			or be compatible. For example, objectives which encourage development may conflict with environmental objectives and vice versa. A compatibility review of the WRMP24 and SEA objectives is presented in Table 4-5." And the following narrative to the table will be added "*The compatibility review demonstrates that the Thames WRMP24 objective on delivering a secure and wholesome water supply could have potential conflicts with a number of the SEA objectives if new infrastructure is needed to deliver this water supply. New infrastructure can have effects for environmental and social receptors. However, taken with the WRMP24 objective to improve environmental and social benefits, it is likely that potential conflicts will be resolved and objectives will be compatible at the plan level and at the project level with appropriate mitigation implemented. The Thames WRMP24 objective on environmental and social benefit supports all the SEA objectives as they are working towards common aims. The Thames WRMP24 objectives on water supply resilience and cost are compatible or not related to the SEA objectives."*

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Improvement 6: Ensure that all supply options provide the necessary Biodiversity Net Gain			
Improvement 6.1	The EA raised this issue in improvement 6.1. In its revised WRMP24, the company has developed a BNG strategy which includes information on how it plans to achieve 10% BNG across its options in its plan. This is included as an Annex within Appendix AA (BNG and NC report). Detail from the gate 2 BNG assessment for SESRO is provided in Appendix AA which covers the areas of net gain and loss that SESRO is expected to provide. However, this detail does not conclude that SESRO will achieve the minimum 10% BNG required to comply with relevant guidance. For the final WRMP24 the company should ensure it clarifies in the narrative in appendix AA whether SESRO will achieve the minimum 10% BNG.	In Appendix AA, in the Executive Summary, Section 3.3, Chapter 5 and 7, it states that "…the 150Mm3 option for SESRO could achieve an overall net gain in biodiversity of 33.09% for habitats, and 16.41% for rivers (LCP, BVP Situations 1, 4 and 8)…", so we therefore meet and exceed 10% for all three types. It is noted that for Lowland Mixed Deciduous Woodland (LWDW), previous Gate 2 calculations identified a deficit of proposed units. However, Gate 2 calculations were based on the precautionary assumption that all woodland was of good condition. As part of Gate 3 work, proposals for off-site enhancement and creations will be investigated to make sure we achieve at least 10% and are therefore compliant should off-site units be required. It should also be noted that there is the likelihood of veteran trees located within the indicative location for SESRO, but further survey work is being undertaken to confirm this. This would result in a bespoke and compensation strategy that would be considered proportionate to the nature and extent of the loss. This bespoke plan would need to be agreed with Natural England and the Local Planning Authorities. We will highlight in Appendix AA that we are going to meet 10% BNG uplift in all three areas and address that we are investigating off-site habitat	To confirm that we will exceed the 10% BNG for all three unit types, including Lowland Mixed Deciduous Woodland (LMDW), and to reflect that further survey work is being undertaken to ensure we meet the minimum 10% BNG, we will add the following text to Section 3.3, Chapters 5 and 7: *"The Gate 2 BNG calculations identified a deficit of proposed hedgerow units and the trading rules for Lowland Mixed Deciduous Woodland (LMDW) could not be met. This is because LMDW is a habitat of high distinctiveness and a precautionary assumption was made that all woodland on site was LMDW of good condition. Therefore, as part of the Gate 3 work, proposals for off-site enhancement and creation or purchase of units will be investigated to achieve at least a 10% BNG should they be needed".* Additionally, we will include the following narrative and plan in Section 3.3, Chapters 5 and 7, to outline mitigation and bespoke compensation plans for the potential removal of veteran trees: "*The Woodland Trust Ancient Tree Inventory indicates that there are potentially veteran trees*

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		creation and/or enhancement is being considered if required for LWDW to ensure we are achieving 10% BNG.	*located within the indicative location for SESRO. However, further survey work as part of Gate 3 is required to confirm this. A bespoke mitigation and compensation strategy would therefore be required and would be designed to make a contribution to biodiversity that is considered proportionate to the nature and extent of the likely loss once this has been determined. Bespoke compensation, which may include a significant amount of tree planting, retention of soils and deadwood from the site area and transplantation of tree cuttings would be required and will need to be agreed with Natural England and the Local Planning Authorities. A compensation strategy appropriate for the unavoidable removal of any ancient/veteran trees will be developed in line with best practice. Since the time of writing further work has been carried out on the landscape master plan for SESRO and the associated BNG requirements and results. These are presented in the SESRO Interim Landscape and Environmental Master Plan Report (June 2024)"*
Improvement 9: Review resilience in the context of the 2022 drought			
Improvement 9.1	The EA raised this issue in improvement 9.1. The company should clearly show in	We will share our workplan for the resilience solutions identified through the lessons learned in	We have not made changes to our plan because of this point. This is a

Point Reference	Text from EA Annex	Our consideration	Changes to the revised draft WRMP24, or if no changes are made, why not
	an appendix to its final plan how it has learned from the conditions experienced in 2022. Thames Water has included an appendix to the WRMP covering lessons learned and planned solutions to improve resilience. It has not detailed a timetable or work plan for this work. Thames Water should commit to a workplan/timetable for resilience solutions identified through the lessons learned in the 2022 drought and provide updates to the EA through the annual review process.	the 2022 drought with the Environment Agency and provide updates to the EA through the annual drought meetings that happen in March/April each year.	commitment to reporting which forms part of our annual drought preparedness reporting to the EA.
Improvement 11: Other sources of supply			
Improvement 11.1	The EA raised this issue in improvement 11.3. The company has detailed its consideration of both the Sevenoaks and Bluewater Quarry options. It explains that a new sewage treatment works near Sevenoaks has the potential for multiple benefits with the increased flows in the river Darent potentially offsetting the need for licence reductions at existing abstractions. It does not explain why additional DO from the Sevenoaks scheme would require a new abstraction point on the river Darent. Thames water has committed to continue to explore the Sevenoaks option. The company should explore with the	The representation made by the Environment Agency in Improvement 11.3 was that Thames Water should clarify whether it has considered the option of additional deployable output benefit from Sevenoaks waste water treatment works. In order for diversion of STW effluent from Sevenoaks STW into the Darent to result in a gain in Deployable Output for London, either: - That effluent would need to be abstracted from the River Darent, or - That effluent would need to be abstracted from a river of which the Darent is a Tributary Thames Water does not have any surface water abstractions on the River Darent. . As such, to	No changes have been made to the rdWRMP as a result of this point, due to the reasons set out in our consideration.

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	Environment Agency whether it would require a new surface water abstraction licence and the likelihood of this being granted.	abstract additional effluent on the Darent would require a new surface water intake on this river. The River Darent is a tributary of the River Thames. However, the Darent joins the Thames downstream of the point at which the Thames becomes tidal (i.e., downstream of all of Thames Water's intakes except Beckton desalination plant), and as such abstraction of additional water put into the Darent would not be possible from the River Thames. Using the effluent to provide a Deployable Output benefit would only be possible if a new abstraction point on the River Darent were introduced. As recommended, we will continue to explore the Sevenoaks option.	
Improvement 12: Correct errors in the company's data tables			
Improvement 12.1	The EA raised this issue in improvement 12.2. The benefits from individual drought permits for all water resource zones (WRZ) other than London are included in table 6. For London WRZ the aggregated benefit of all drought permits was calculated with a DO run. This makes it difficult to check the DO volumes against the drought plan. The company states it does not have the information to split out the DO benefit afforded by each individual drought permit option.	The situation as stated in our rdWRMP24 is unchanged. We have not been able to undertake model runs to identify the Deployable Output benefit for each drought permit option individually. This is in part because some of these drought permits are linked – e.g., in a drought we may apply for a drought permit to reduce the TTF to 100 Ml/d and then 0 Ml/d.	We have made no changes as a result of this point, as we do not have the modelling detail to split out the benefit from each permit in the London WRZ.

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	To improve the clarity for stakeholders and regulators for the final WRMP24, Thames Water should present the individual benefits of drought permits in its London WRZ.		
Improvement 12.2	The EA raised this issue in improvement 12.3. We asked the company to update Table 1a in the planning tables to accurately reflect the deployable output of the licences at the start of the planning period. Between the draft and revised draft WRMP24, the forecast has been re-based to AR22. The closure of Hawridge is expected to be deferred to AMP8, and the company stated that the updated timing would be reflected in line 7.2BL in Tables 3a and 3d. The company has updated table 3d. However, the volumes in table 3a 7.2BL are higher than expected. The company should work with the Environment Agency to confirm the correct volumes and timing for changes to the Hawridge licence, including factoring in any delay. It should ensure that data in the final WRMP24 tables reflect agreed volumes and timings.	The AMP7 WINEP action includes closure of the Hawridge source. The following are parameters of the Hawridge source (at present, i.e., prior to closure): - Annual Average licence – 9.09 Ml/d - Annual Average DO – 6.91 Ml/d - Peak Licence – 9.09 Ml/d - Peak DO – 6.91 Ml/d The DO for the source is less than the licence, as the source DO is constrained by Pump Capacity. At the point at which a licence reduction is now anticipated, 2028/29, line 7.2BL for SWA WRZ for both Annual Average and Critical Period scenarios includes a 6.91 Ml/d reduction. As the WRMP tables detail WAFU changes, this reflects the DO reduction associated with the source's closure and not the licence reduction. We are still working on the Hawridge scheme to determine the exact scope of the final solution and therefore the date for delivery in AMP8. The final solution has been impacted by delays arising from the requirement to cross the HS2 route. Until this	No changes have been made to the rdWRMP as a result of this change, as the representation of the Hawridge source's closure in our rdWRMP24 Tables is correct. We will report on updates in the WRMP Annual Review

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		is confirmed we cannot finalise the solution and go out to tender and only when a contractor is in place can we get a confirmed programme with a definitive completion date. We will report on progress in the WRMP Annual Review.	
The following are issues identified by third party stakeholders which require further actions by the company for the final WRMP24			
Stakeholder 1.1	Communicating water labelling to customers WaterWise asked Thames Water to include a budget in its final plans to support/promote the roll-out of water labelling in AMP8 to its customers. The trial of a linked incentive scheme could also be considered. Thames Water should consider budgeting for customer engagement for water labelling in the final WRMP24.	In our rdWRMP demand plan, we included the option named "Household Innovation and Tariffs". Within this wider option, Section 8 of the rdWRMP explains that there are six component parts. One of these is "Water Efficiency Media campaigns" (rdWRMP24 paragraphs 8.206-8.211). There is an allocated budget line against the "Household Innovation and Tariffs" line item, totalling nearly £30m in AMP8. We agree that publicising the water labelling is a good idea.	In Section 8 of our WRMP, we have added the following text after rdWRMP24 paragraph 8.211: "In AMP8 we will identify how we should communicate the introduction of water labelling and factor this into in our Water Efficiency Media campaigns."
Stakeholder 2.1	Collaboration with stakeholder Waterwise identified further policy-led opportunities to secure additional water savings, through regulations for new build development, retrofitting and water labelling, and urged Thames Water to continue to work with Waterwise to advocate for more supportive policies. Thames Water should directly address this query.	We agree that significant innovation will be needed in the future. We have allowed for >60 Ml/d of demand reduction to be delivered by tariffs and innovative solutions by 2050, with significantly more demand reduction required through government-led reduction. We also agree that significant reductions will ned to be driven through policy changes. We will continue to advocate for policy changes which will drive forward the water efficiency agenda.	In Section 8 of our WRMP, we have added the following text after rdWRMP24 paragraph 8.214: "We will look to work with third parties, such as companies promoting innovative water efficiency solutions and NGOs such as Waterwise to drive forward the innovation and policy agenda on water efficiency."

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	Thames Water should address this point in response to Waterwise and show commitment to working further with WaterWise on household demand.	We commit to working with Waterwise in the future.	
Stakeholder 3.1	Policy details in Government Options Waterwise asked Thames Water to set out what specific policies are included in Government Options A to H presented in Chapter 8, including specifically the option which has been adopted by WRSE. Thames Water should directly address this query. Thames Water should improve presentation of Government led policies described in Chapter 8 in the relevant chapters in the final WRMP24.	This information was provided in the rdWRMP24 via a referenced WRSE document. In order to improve the ease of access of information we will include additional information in rdWRMP24 Section 8.	In WRMP24 Section 8 we will add the following additional text after rdWRMP24 paragraph 8.263: The different scenarios are built up from underlying policies (all benefits are profiled linearly over time, from 0 l/h/d benefit in the year the profile is introduced): • Low - Water labelling without minimum standards – 6 l/h/d benefit 15 years after policy introduced. • Medium – Introduction of minimum standards on white goods – additional 6 l/h/d benefit 15 years after policy introduced. • High – Full government support including optimistic estimate for water labelling and minimum standards on white goods, in addition to introduction of buildings regulations changes – additional 12 l/h/d 15 years after policy introduced. 8.267 The C+ programme assumes the “low” profile from 2025 onwards, with the “medium” savings introduced from

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			2030 onwards and the "high" savings introduced from 2035 onwards. Table XX below shows the benefits from different policies in the C+ profile. A table is also included in Section 8 to provide further information.
Stakeholder 4.1	Demand saving (PCC reduction) options Waterwise suggested that one area that should be considered to deliver further PCC savings is the use of relatively inexpensive flow controllers/regulators. In small scale trials (Affinity, Sussex, NWL) flow controller/regulators have been found to deliver 35-64 litre savings per property with further larger scale trials planned in Sussex and by UU, Severn Trent Water, Yorkshire Water and others. One cost effective option Thames Water could consider that other companies are exploring is fitting these devices when smart water meters are fitted focussing on known high water pressure areas. Alternatively in all new homes and on change of occupancy in those areas. Thames Water should add information into the final WRMP24 to demonstrate how it has considered flow controllers/regulators within its plans to drive down PCC.	We agree that flow regulators have a role to play in future demand reduction investment and interventions. These devices present an opportunity to deliver measurable demand reductions on both household and business connections. Thames Water is currently engaging with several suppliers of flow regulators and is planning to undertake pilot activity to determine the scale of water savings that could be achieved against specific property types and business categories, and increase our understanding of potential demand reductions across a range of network flow rates and pressures. We have built into our AMP8 demand reduction activities through the Household Innovation and Tariffs demand option, with the opportunity for these flow regulator devices to be included, should our pilot work streams provide cost effective and measurable demand reductions.	In the "AMP8 Water Efficiency Innovation Trials" of our WRMP, we have specifically highlighted flow regulators/controllers as an innovation to be trialled in AMP8.

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Stakeholder 5.1	Clarity of Bill Impacts on Customers Consumer Council for Water stated that bill impacts to customers could be misunderstood. There is scope for someone to believe that the additional £37 by 2035 is additive to the £14 bill impact by 2030 rather than the incremental impact between 2030 and 2035 being £23. This is not addressed in the SOR. Thames Water should make impacts to customer bills clearer in the final WRMP24.	We recognise the need to ensure that bill impacts are stated in a transparent and clear way. We will make amendments accordingly.	We have added the following text to the WRMP Section 11, in the caption to rdWRMP24 Table 11-37: “Note: Bill impacts stated are cumulative, not additive (i.e., the values stated in the 2046-50 column are the estimated bill impact of the programme at that point, not the additional bill impact in that five-year period)”
Stakeholder 6.1	Definition of the word “customer” MOSL asked Thames Water to clarify when using the term "customer", if referring to households, non-households or all customers. Thames Water should directly address this query. Thames Water should address this request from MOSL in the final WRMP24.	Appendix T of the rdWRMP highlighted in paragraph T.2 that “We engaged a wide range of customer segments including hard to reach, future and non-household customers”. Our customer research included non-household customers as a specific cohort. Figure T-16 in the rdWRMP highlights that the WRSE research that was undertaken included significant representation for non-household customers. Several statements across Appendix T highlight the views of household and non-household customers. The key findings of the research are not significantly different between household and	We have added in the following text to Appendix T of the WRMP: “The key findings of the WRSE report are summarised here. For more information, including the survey structure and more detailed analysis of household and non-household customers’ views, please read the WRSE report.” [link provided in footnote]

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		non-household customers and so it was appropriate to use the broad term "customer". We appreciate that there is a need to be clear in distinguishing between the views of household and non-household customers. We have done this to an extent in Appendix T of the WRMP and will look to improve on this in WRMP29.	
Stakeholder 7.1	Size and importance of the NHH market to the WRMP MOSL asked for a clear statement regarding the recognition of the size and importance of the nonhousehold (NHH) market and the role it plays in delivering Thames Water's WRMP, reducing water demand and wastage. Thames Water's statement on its wholesaler status in Appendix O lacks detail. Everflow raised the same issue. Thames Water should address this request from MOSL and Everflow with further information in the final WRMP24.	The Non-household market is clearly very important to our WRMP planning. In the base year (2021-22), non-household consumption made up approximately 15% of our total Distribution Input. Our rdWRMP24 forecasts showed that, without action, we forecast 55 Ml/d of NHH growth by 2040. Our final plan includes NHH demand reduction totalling 70 Ml/d by this point. Figure 11-2 in the rdWRMP24 clearly shows the important role of NHH demand reduction in reducing demand. However, the volume of NHH demand reduction in our plan is significantly smaller than the amount of HH demand reduction and leakage reduction, by a significant margin, and so it is right that less attention is paid to NHH demand reduction in the plan. We do not agree that Appendix O lacked detail regarding our wholesaler status. It included the unequivocal statement: "as a wholesaler, we still supply businesses in our supply area with water as a wholesaler, and they make up a significant	We have added the following paragraph to Section 11 of the rdWRMP, after rdWRMP24 paragraph 11.49: "At the moment, non-household demand makes up around 15% of the demand for water. Without action, we are forecasting significant increases in non-household demand. In order to meet the non-household demand targets and ensure the security of supply, non-household demand reduction is of great importance. As a wholesaler, we will look to ensure universal NHH smart metering by the end of AMP8, work with individual NHH customers to drive NHH water efficiency through our Smarter Business Visit programme, focus on fixing continuous flow issues, and work with retailers to drive further water efficiency."

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		proportion of our demand. To ensure the security of our supply, it is crucial we still carry out water saving activities with both household and NHH customers". This underlines our commitment to NHH water efficiency. We acknowledge that elements of the NHH demand reduction plan lack specific detail. In a similar way to the uncertainty associated with achievement of the 110 l/h/d PCC target, achieving a gross reduction of 15% in NHH demand will be challenging, and so some innovations will be needed to achieve this.	
Stakeholder 8.1	NHH smart meter roll out MOSL asked for Clarity on the number of smart meters that Thames Water intend to deploy in AMP8 and beyond for retailers. Visibility on when they will be rolled out, and where, will help avoid duplication of effort. The Environment Agency noted that in the planning tables, the Non-household Progressive Smart (PSUP) shows the gains in WAFU but not the actual number of meters installed during AMP8. Also in table 8-31 (Chapter 8) non-household smart meter upgrades are AMP7 (55,000), AMP8 (60,411) & AMP9 (58,737). This equates to 100% non-household penetration by AMP9, but without division between WRZs.	This information is already featured in our plan. The number of NHH meter upgrades planned in each WRZ is included in Section 11 of our WRMP. A breakdown of the demand programme is provided for each WRZ (e.g., for London in the rdWRMP24 this was Table 11-14). Lines within this table indicate the benefits forecast from NHH demand reduction activity and the number of NHH smart meter upgrades planned in the WRZ in each AMP. Between our rdWRMP24 and final WRMP we have updated our Non-Household metering plan, in line with our business plan submission. We aim to achieve 100% NHH smart meter penetration by the end of AMP8.	We have not made amendments to our plan following this representation, as the information is already included in the rdWRMP24. As highlighted, however, we have accelerated our NHH smart meter upgrade programme, with the aim of achieving 100% NHH smart meter penetration by the end of AMP8.

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	Thames Water should clarify if 100% non-houshold smart meter penetration by AMP9 is intended and realistic, and describe the sequence of zones to focus the roll out.		
Stakeholder 9.1	Evidence of working with retailers MOSL asked for evidence of working with retailers to avoid refusal of PR24 outperformance payments – e.g., a pain/gain sharing mechanism or incentives for retailer water efficiency offering. Thames Water should directly address this comment. Thames Water should address this request from MOSL in the final WRMP24.	Rewards and penalties are determined through the business plan rather than the WRMP. This is a matter for the PR24 business plan and so has not been addressed here.	No changes made to the plan, as this is a matter for the Business plan.
Stakeholder 10.1	Working and engaging with retailers Everflow recommended true collaboration between wholesalers and business retailers. Thames Water (as a wholesaler) is asked to include specifically how they plan to work and communicate with retailers in their local region, beyond describing a companywide strategy. Thames Water should directly address this recommendation. Thames Water should describe how it plans to work and communicate with	As highlighted in our Business Plan (https://www.thameswater.co.uk/media-library/home/about-us/regulation/our-five-year-plan/pr24-2023/wrmp-demand-reduction.pdf), NHH retailer engagement activity to deliver water efficiency benefits has been considered in the "NHH Innovation" category. In AMP8, a relatively small allowance for water efficiency gains through this activity has been made (0.5 Ml/d), with the bulk of NHH demand reduction due to come through targeting continuous flow and SBVs, enabled by smart meter upgrades. As such, and as described in the Business Plan document linked above, AMP8	No changes have been made to the WRMP24 as a result of this representation, as NHH retailer activity will be delivered through trials in AMP8. As such, a detailed plan is not yet available.

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	retailers in its local region in the final WRMP24.	engagement with regulators will involve trials, using smart meter data to encourage non-household retailers to undertake their own water efficiency visits and interventions on their customer properties. Specific plans to work and communicate with retailers have not yet been derived, but will be trialled in AMP8.	
Stakeholder 11.1	Carbon emissions from the Teddington DRA Greater London Authority (GLA) recommends Thames Water to look at addressing carbon emissions from the Teddington DRA scheme in context of meeting London's net zero target in 2030. Thames Water should directly address this recommendation. TW should discuss Teddington's carbon footprint in context of London's net zero target in the final WRMP24.	We acknowledge that our plan needs to be viewed within a wider regional and national context, and that the emissions associated with our plan are important in the context of regional and national net zero targets. As highlighted in Section 11 of the rdWRMP24, the Teddington DRA scheme is a lower carbon alternative to other means of ensuring the statutory requirement of having a resilient water supply. Greater London Authority are represented within Thames Waters Customer Challenge Group (CCG), which is an independent body that provides thorough reporting and commentary to all our customers, the public and Ofwat. CCG members have been selected from a cross-section of customers, regulators and other groups who play an important part in the life of our region. Every year, the CCG gives its view on how well we're meeting its commitments. They provide a formal report to our regulator, Ofwat, in response to consultations and questions. They also comment on our future plans and were last briefed	We have included further reference to regional and national carbon emissions targets within Section 11 of our WRMP. This has been included after rdWRMP24 paragraph 11.320 with the following text: "Planned interventions required to provide our statutory service to our customers have the potential to impact our greenhouse gas emissions. This may in turn have consequences for regional and national net-zero targets. We are committed to reducing our greenhouse gas emissions and will seek to minimise the carbon impact of our solutions wherever practicable. Some of our interventions, such as the reduction of leakage and per capita consumption, will result in a reduction in emissions as we treat less water, but to achieve this, there will be a capital carbon intervention such as mains rehabilitation, or metering. Other capital schemes, such as the supply schemes

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		on our decarbonisation plans and challenges in July.	included in our WRMP, will entail emissions during construction. We will continue to report the operational and capital carbon emissions attributed to our investments as we report our progress towards Net Zero. Our decarbonisation plans for 2030 build on the work of the previous 10 years and include reducing the use of fossils fuels, improving energy and fuel efficiency and generating more renewable energy."
Stakeholder 12.1	Delay to AMP7 WINEP abstraction reduction programme Chalk Streams First (CSF) commented on Thames Water's abstraction reduction programme. There are concerns from regulators and stakeholders that the known delay in Thames Water's AMP7 programme will have knock on effects on the AMP8/9 investigations. The sources in the Cray and Darent catchments (EA KSLES Area) are of particular concern. Thames Water references the Albury source in its response and says "the existing flow constraint provides environmental protection and so in this case we do not consider that inclusion of a licence reduction in the low/medium scenario is warranted." EA's Thames Area office advises that the HoF on this licence	There is no notable delay in our AMP7 investigation programme. There is a possible minor delay to the Pangbourne investigation (if an Options Appraisal is needed), but the delay and its consequences are not significant. The delay in our AMP7 programme is related to implementation of sustainability reductions. Delays to this programme of sustainability reduction implementation will not have knock on impacts for investigations in AMP8. The investigations will go ahead as planned, although we accept that the delay to the North Orpington reduction may have consequences for the data available in AMP8. Our AMP8 WINEP programme includes investigations into Westerham, Sundridge, Horton Kirby, Eynsford and Lullingstone. We will work with the EA on the investigations into these sources.	We have included the following text in our Monitoring Plan (WRMP Section 11), in the table that formed part of our Defra RFI response, in the table row "Environmental Destination": "Investigation progress communicated with the EA, and summarised in WRMP Annual Review"

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	is set extremely low and does not offer the protection required. Thames Water should ensure that it works with EA Area offices to complete AMP7 investigations by March 2025, and further refine the approach it takes to prioritise the sources for licence reductions, and report the update through WRMP annual reviews. Thames Water should confirm the timeframe of the investigation programme of Lullingstone, Eynsford, Horton Kirby, Westerham and Sundridge sources with the EA. Thames Water should reassess the HoF level on the Albury source and whether it should be included for licence reduction in the low/medium scenario.	We accept that the HOF on the Albury licence is set at a low level. We will explore whether Albury should be included in the Low/Medium scenarios in WRMP29 and will continue to work with the EA to assess the magnitude and location for the HOF. Our supply-demand balance in the low/medium scenarios does not indicate that inclusion of the Albury sources would result in additional investment requirements in those scenarios. We will communicate regularly with the EA Area offices through the WINEP investigation and Environmental Destination scenario development processes in AMP8, summarising progress in the Annual Review.	
Stakeholder 13.1	Programme detail and results of existing demand reduction actions Swindon Borough Council asked for steps that the company has taken or will take to support customers using water more wisely, including details of campaigns/their frequency and any measurable impacts on consumption/ behaviour change, so that the Council could have greater assurance in the proposed actions. Thames Water should directly address this query.	Demand reductions delivered through our actions to date have been documented in our Annual Performance Report and WRMP Annual Review. We do not agree that reproducing that information in our WRMP24 is necessary given that it is in the public domain. In rdWRMP24 Section 8 we have also already documented the process by which we have determined our demand reduction profiles, including summarising the evidence behind the profiles. As examples, we have provided the evidence in rdWRMP24 Section 8 for the assumptions for the benefits from smart meter	We have not made changes to our rdWRMP24 following this point, as the information is already in our rdWRMP24, Annual Review, and Annual Performance Reports. We will continue to document the results of demand management efforts in our WRMP Annual Review.

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	Thames Water should address this request for assurance on the success of existing demand measures directly with the Council, and report the results of ongoing demand actions through the WRMP annual review process.	installs (both CSL reduction and usage reduction in paragraphs 8.47-8.73) and the savings delivered through Smarter Home Visits (paragraphs 8.236-8.256). As described, the benefits have been derived through analysis of demand reductions that have been achieved. We have noted that significant societal change and government input, out of our control, will be needed to achieve the 110 l/h/d target.	
Stakeholder 14.1	Impact of WRP decisions on NHH customers WaterScan observed a "serious lack of consideration" of other stakeholders, particularly NHH customers in the draft WRMPs. WaterScan also noted a lack of transparency and clarity around the impact that Wholesaler decisions have on business customers. Thames Water discussed strategies for data access and communication with business customers in the Statement of Response, but did not address the key concern about transparency and clarity of how the plan's decisions impact on business customers. TW should address WaterScan's concerns about transparency and clarity around the impact that Wholesaler decisions have on business customers.	As highlighted in response to issues “Stakeholder 6.1” and “Stakeholder 7.1” above, we do not agree that non-household customers have received a lack of consideration in our WRMP. Non-household customers were consulted on in our customer research, and the detailed analysis contained of non-household customer views is presented in the referenced WRSE reports. Several statements across Appendix T highlight the views of household and non-household customers. The key findings of the research are not significantly different between household and non-household customers and so it was appropriate to use the broad term “customer”. In the base year (2021-22), non-household consumption made up approximately 15% of our total Distribution Input. Our rdWRMP24 forecasts showed that, without action, we forecast 55 Ml/d of NHH growth by 2040. Our final plan includes NHH demand reduction totalling 70 Ml/d by this point. Figure 11-2 in the rdWRMP24 clearly shows	We have not made changes to our rdWRMP in relation to the points raised around lack of consideration of NHH customers or transparency. However, relating to the concerns around clarity, we have produced a non-technical summary to accompany our final WRMP24.

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		the important role of NHH demand reduction in reducing demand. However, the volume of NHH demand reduction in our plan is significantly smaller than the amount of HH demand reduction and leakage reduction, by a significant margin, and so it is right that less attention is paid to NHH demand reduction in the plan. The primary mechanism of reducing NHH demand is forecast to be through Smarter Business Visits, which allow NHH customers to improve their water efficiency, primarily through wastage fixes. From our further review of Waterscan's representation, their concern in relation to transparency was the transparency of the selection of national targets by Defra, with Waterscan suggesting that we should try to go further than the nationally set targets in our demand reduction efforts. We cannot comment on the transparency behind the Defra targets and, as we have set out in our rdWRMP24, we think that there is a significant amount of risk associated with achievement of the government targets and thus relying further on demand reduction would not be the best value solution for customers (HH or NHH). Regarding clarity of the plan, for the final WRMP we will re-include a non-technical summary. Regarding clarity on how we will work with NHH customers for AMP8 (and beyond) delivery of NHH	

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		demand reduction, in Section 8 of the rdWRMP24 we have stated the individual interventions we will make, and have highlighted that retailer engagement will be determined through trials in AMP8.	
Stakeholder 15.1	Carbon emission and carbon cost of relevant SROs Water Resources West queried the relative carbon emission and carbon costs between SESRO and STT in the draft WRMP, and suggested that "to aid transparency, a clear assessment of the carbon costs for the STT are shown in your plan." Thames Water responded that carbon assessments of SROs are available in published RAPID gated programme, although accepted that interested parties would have to look in 3 separate SRO reports for comprehensive information. Thames Water did not provide further information or make changes to the plan. Thames Water should consider summarising the approach and output of carbon emission and carbon cost assessments from the relevant SRO documentations, e.g. as part of the RAPID gate submissions, and present it clearly in the final WRMP24.	The issue of cost and carbon comparison of STT and SESRO is complex, as highlighted in our response to issue 14.1 of the Defra Request for Information. The STT is modular, and both SESRO and STT could be used by different water companies at different points in the planning horizon alongside other solutions. We consider that the SRO Gated documentation and WRMP Tables present the carbon estimates for the solutions in a transparent and consistent way. Section 10 and Appendix X of our rdWRMP also shows carbon emissions at a plan level.	We have not made changes to our WRMP following this representation, as we consider that carbon emissions information is presented in a transparent and consistent manner in the WRMP tables and SRO gated documentation.

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Stakeholder 16.1	Optimisation of the River Thames system Water Resources West noted a lack of a full assessment in the Thames Water draft plans for how the River Thames system could be optimised with the STT in a no-SESRO scenario. Thames Water states that it believes such a re-optimisation is not warranted, however insufficient justification has been provided to support this. Thames Water should consider further assessment on reoptimising the River Thames system as part of the RAPID scheme for STT or provide robust justification as to why this assessment is not warranted. Outcomes of this further work, if carried out, should be reported as it progresses in annual reviews of the WRMP24, and in full in WRMP29.	We have expanded on the justification given in the Statement of Response. The Lower Thames reservoirs are large. Most of the time, outside of drought scenarios, these reservoirs are full and so releases from STT/SESRO would not be of benefit. When our reservoirs are not full, there is space for water to be transferred into them during the long-duration drought events to which the system is most vulnerable. Deployable Output benefit for the Lower Thames reservoir system is generated via transfers being made over a long period, and the existing assumptions around control curves and scheme triggers ensure that this is achieved. As further detail in this respect, during droughts, the LTCD trigger for the STT (and SESRO) is hit when our reservoirs are very nearly full (see Appendix I, LTCD schematic for further details) as the control curve has been designed to maximise Annual Average Deployable Output gain. We agree that, in the longer term, some optimisation of the River Thames and SESRO/STT strategic control system will be needed. However, at the present time there are too many uncertainties for this to be a useful exercise (e.g., under different scenarios of licence reduction and demand reduction, different utilisation patterns may be seen).	We have not made changes to our WRPM following this representation, as we consider that the expanded description here provides the necessary evidence. We will report on any optimisation exercises which are carried out through the RAPID process.

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		We will recommend that optimisation of the STT, SESRO and STT/SESRO systems is explored through the RAPID process and will report on this in the Annual Review and WRMP29.	
Stakeholder 17.1	Unanswered concerns on Teddington operation Broom Water Association stated that there were concerns on Teddington's abstraction and discharge processes not fully addressed. for example: - Originally the scheme publications referred to use of this facility being “once every 2 to 3 years and then only between August and November”. It now seems that to avoid the infrastructure “clogging up” it will be operated at 25% capacity at all other times to provide a “sweetening flow” for what is understood to be treated effluent only. -some key river flow dynamics which are well known to local residents have not been appropriately modelled. For instance the occurrence of "back flow" of water above the weir at high tides, reversing flow well upstream and beyond Trowlock Island. This flow would be through both outfall and abstraction areas, and thus pose a significant risk to heavily used areas, including the Lensbury watersports centre, to swimmers, and all other river users.	The specific details of the operation of the Teddington DRA are being developed and discussed through the RAPID gated process. Further detail will be provided in the RAPID Gate 3 documentation. However, as a summary: - It is estimated that the scheme will be operated to its full capacity on average once every other year, during periods of prolonged dry weather and when reservoir storage levels are low, and it would be triggered by the Lower Thames Control Diagram. - The scheme will be operated at a low level, known as a sweetening flow, all the time, in some capacity, so that it is ready when it is needed. - The recycled water would be discharged back to the environment with the Mogden STW discharge at Isleworth Ait, providing improvements to the water quality in the tidal River Thames owing to the additional treatment applied to the discharge. A small proportion of this flow may also be discharged through the pipeline to the River Thames to keep the pipeline ready for full operation when required.	We have not made changes to the WRMP following this representation as the issues raised are to be dealt with through the RAPID gated process.

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	Thames Water should answer these concerns from Broom Water Association directly, and update documentation for Teddington for clarity to the stakeholders.	We are aware that on occasions there is tidal incursion above Teddington Weir and this will be taken into account as we develop our operational protocol for the scheme. We manage abstraction in collaboration with the EA and are in daily contact to manage risks with abstraction and to maintain the required river flows. Safeguards would be built into the scheme whereby we would monitor tidal levels downstream of the weirs and stop abstracting when there is a risk of spring tides backflow over the weir and for a period of time after to allow freshwater to flush out the brackish flow. Tidal overtopping of Teddington weir does not affect the Deployable Output of the scheme, its conceptual feasibility, or its cost. Issues such as this will be considered in more detail through the SRO development process and are beyond the level of detail that is needed for the WRMP.	

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