



Water Resources Management Plan 2024

Technical Appendix S - Engaging with
Stakeholders

Background and Introduction	3
Regulatory requirements and expectations.....	5
Pre-consultation to inform the development of the South East regional plan	7
Overview.....	7
Fuller detail on the engagement	8
Pre-consultation on our WRMP24	12
Public consultation	16
Strategic resource options.....	19
Engagement since publication of our Revised Draft WRMP24	22
Engagement with Regulators	22
Engagement on Strategic Resource Options	22
Annex: Changes Made Between Plan Iterations	24
Annex 1 – Membership of WRSE stakeholder groups	25
Annex 2 – Overview of engagement to inform the development of the South East plan	26
Annex 3 – Pre-consultation letter sent to all statutory and non-statutory consultees plus interested parties, July 2022.....	30
Annex 4 – Letter sent to all statutory and non-statutory consultees plus interested parties advising them of the start of the public consultation, December 2022	34
Annex 5 – Letter sent to all statutory and non-statutory consultees plus interested parties to remind them of the public consultation, February 2022.....	37
Annex 6 – Letter sent to all statutory and non-statutory consultees plus interested parties to remind them of the close of the public consultation, March 2023	38
Annex 7 – Letter sent to all respondents to the public consultation advising them of the revised date for the publication of the statement of response, June 2023	39

Figures

S.1	F
Figure S-1: An overview of WRSE's Engagement Framework	9
S.2	F
Figure S-2: The consultation on the South East emerging plan	10
S.3	F
Figure S-3: Timetable of the gated process for strategic resource solutions	20

Tables

S.4	T
Table S-1: Overview of the Water Resource Forums held since 2020	12
S.5	T
Table S-2: Overview of engagement with statutory and non-statutory consultees on our WRMP2415	



S.6	T
Table S-3: Community information events, pop up events and the webinar	17

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 South East regional plan and our Water Resources Management Plan (WRMP24). We have endeavoured to engage effectively with a diverse range of stakeholders and ensure everyone has the opportunity to participate in the development of our long term plan for water. We have also engaged with our customers throughout the development of our WRMP24, engagement with our customers is not presented here, it is presented in Appendix T.

The South East regional plan is the foundation for our WRMP24. We have worked closely with Water Resources South East (WRSE) to ensure there was a clear line of sight for stakeholders between the South East regional plan and our WRMP24. We have endeavoured to clearly explain the inter-relationship between the South East regional plan and our WRMP24 and designed an integrated engagement programme to aid stakeholders to participate in the development of the South East regional plan, and in turn our WRMP24. The scope of this appendix therefore includes engagement undertaken through the development of the South East regional plan and engagement specifically undertaken to inform our WRMP24, as well as the consultation on our draft WRMP24.

We engaged with stakeholders throughout the development of the South East regional plan to ensure visibility and understanding of the objectives, policies, technical methods and assessments, sharing information in a clear and accessible way and providing opportunities to input and shape the South East plan at a formative stage. We also undertook specific pre-consultation activity with stakeholders on our draft WRMP24.

We published our draft WRMP24 for public consultation in December 2022. We received over 1,680 representations to the consultation, and have carefully reviewed all the representations and working closely with Water Resources South East, and the other South East water companies, we have finalised our WRMP24 in response to representations and new information.

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

For a definition of technical terms and acronyms used in this appendix please refer to the WRMP24 glossary which is published on www.thames-wrmp.co.uk in the Document Library.

S.7 There have been significant changes to the water resources planning framework since WRMP19, principally the publication of the National Framework¹ and the strengthened role of regional planning.

S.8 In the South East we have worked in partnership with Water Resources South East (WRSE), an alliance of the six water companies² who provide drinking water to customers in the South East region, to develop the best value plan for the South East region. We have engaged with stakeholders³ throughout the development of the South East regional plan⁴ to ensure visibility and understanding of the objectives, technical methods 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.9 We have also considered local stakeholders who may have an interest in the South East regional plan and our WRMP24, this may be in relation to a particular watercourse, catchment, or scheme, and we have endeavoured to engage effectively with these stakeholders at timely points through the process.

S.10 In this appendix we provide information on the engagement undertaken to inform the South East regional plan, the foundation to our WRMP24; engagement specifically undertaken on our WRMP24; and the public consultation on our draft WRMP24. The structure of the appendix is as follows:

- Regulatory requirements and expectations in relation to engagement
- Overview of engagement on the South East regional plan
- Overview of pre-consultation activity on our WRMP24
- Overview of the public consultation on our draft WRMP24
- Interaction with the strategic water resource solutions, referred to as Strategic Resource Options (SROs)

¹ Environment Agency, National Framework for Water Resources, March 2020

² Affinity Water, Portsmouth Water, Southern Water, SES Water, South East Water, and Thames Water

³ We have used the term “stakeholder” through this appendix and the WRMP more generally. The term includes any organisation or individual who has an interest or “stake” in the WRMP and includes government, regulators, local authorities, NGOs and charities and local communities.

⁴ This appendix includes engagement undertaken to inform the draft South East regional plan as the SE regional plan is the foundation of our WRMP24 and we can an integrated programme of engagement to ensure clarity and ease for stakeholders. Thames Water supplemented the integrated programme with additional bespoke engagement where this was required.

Regulatory requirements and expectations

S.11 The Water Resources Planning Guideline (WRPG)⁵ specifies the need for engagement at an early stage in the development of a WRMP 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.12 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 the Strategic Environmental Assessment (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 methods and the approaches as well as specific topics such as the delivery of commitments made in WRMP19; the water 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 water resources planning
- The need to hold a public consultation on the draft WRMP24 including the importance of promoting and sharing the draft WRMP24 effectively with interested stakeholders and 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 WRMP24 for consultation which must:
 - Show consideration of the representations received

⁵ Environment Agency, Ofwat, NRW - Water Resources Planning Guideline, July 2022 and updated March 2023

- Set out the changes made to the draft WRMP24 as a result of the representations, and the reasons for making them
- Describe anything that has changed during the consultation period

S.13 We have complied with legal requirements and expectations set out in the National Framework¹ and Water Resources Planning Guideline² in designing our pre-consultation and consultation activities.

S.14 In addition, we are also required to comply with the requirements of the Strategic Environmental Assessment (SEA) Regulations⁶ and Habitats Regulations⁷, which have their own specific consultation obligations. Information on these aspects is presented in Section 9 of the WRMP24.

⁶ The Environmental Assessment of Plans and Programmes Regulations 2004 (S.I. 2004 No. 1633)

⁷ 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 to inform the development of the South East regional plan

Overview

S.15 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 South East water companies, to ensure the regional plan has been developed in collaboration with water-using sectors from across the region and using insight from stakeholders. This is important for our WRMP24, as our WRMP24 reflects the South East regional plan as required by regulatory guideline, and therefore the engagement on the South East regional plan is directly relevant to our WRMP24. Thames Water ensured that stakeholders in the Thames Water supply area, that were interested in long term water resources planning, were advised of, and had the opportunity to participate in, WRSE-led engagement, with a clear understanding of the relationship between the South East regional plan and Thames Water's WRMP24.

S.16 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.17 WRSE published, and consulted on, its approach for stakeholder engagement and updated its method statement⁸ in response to feedback. This was important in setting out the framework and approach from the outset.

S.18 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.19 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.20 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 workstream), and the Engagement and Communications Board (engagement workstream), as well participating in workshops and topic specific briefings.

S.21 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 South East plan. Membership of each of the advisory groups is presented in Annex 1.

S.22 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

⁸ WRSE Method Statement on stakeholder engagement, July 2021

resulted in over 300 catchment solutions being proposed. A full log of WRSE-led engagement over the period of development of the South East regional plan is presented in Annex 2.

S.23 In addition to the engagement to inform the South East plan, the water companies led additional engagement as relevant to their WRMPs. For example Thames Water and Affinity Water continued 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 planning. WRSE joined all of these Forums to ensure the connectivity between the South East regional plan and companies' WRMPs was fully understood.

Fuller detail on the engagement

S.24 WRSE has held consultations on the building blocks of the South East regional 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.25 WRSE has maintained regular communications through a dedicated website and newsletter, as well as using social media and the wider media to showcase and raise awareness of the South East regional plan.

S.26 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.

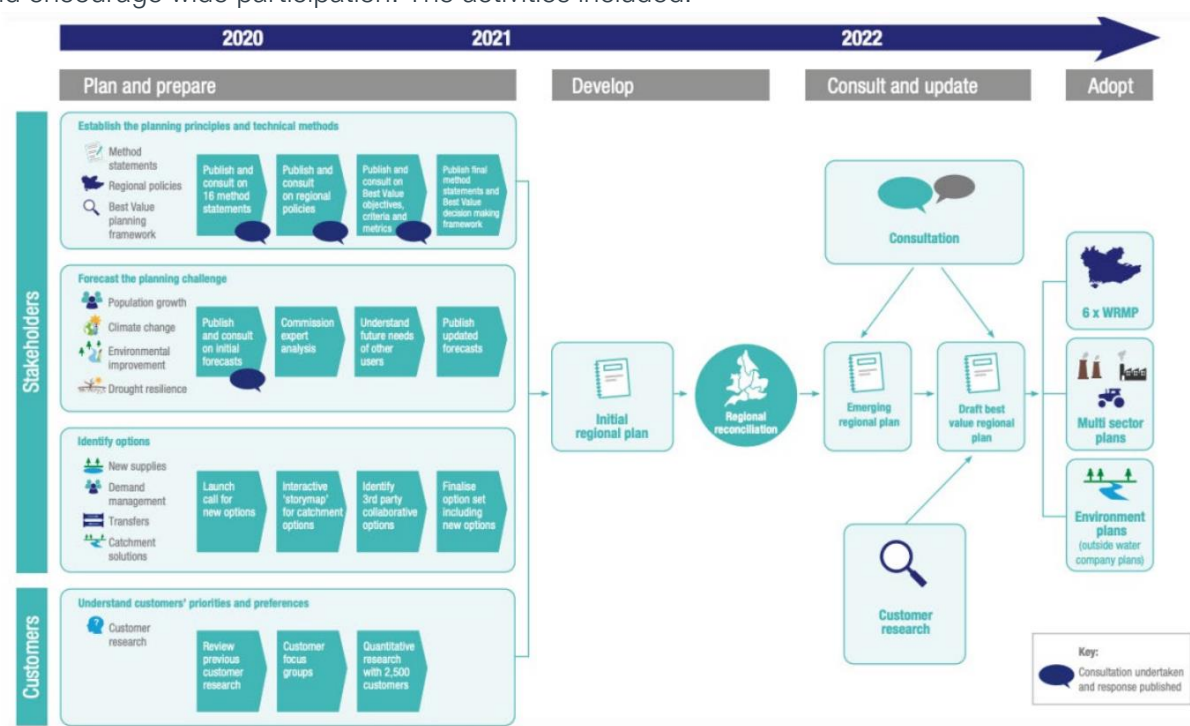
- Plan and prepare – up to 2020, the focus was on the 'building blocks' of the South East regional plan. This covered the technical methods, approaches and tools that would be applied in the development phase, for example, the forecasts for future growth and demand for water; the environmental assessments; 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 South East regional plan.
- Develop – during 2021, the focus broadened and set out the planning challenge for the South East 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' South East regional plan.

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

S.27 WRSE published a report⁹ on the stakeholder engagement undertaken which summarised the extensive engagement and consultation activity that had taken place up to January 2022 to inform the development of the best value regional plan. The report covered the structure and governance arrangements, the engagement activities and how these informed decisions leading up to the consultation on the emerging regional plan in early 2022.

S.28 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 regional 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 comment, a series of online workshops were held for stakeholders to provide an overview of the emerging plan, the work to date and further work planned to transition to a best value plan for the South East region.

S.29 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 emerging 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.30 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

⁹ WRSE Stakeholder Engagement Report, January 2022

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 the prescribed 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.31 WRSE received over 1,150 written responses to the consultation on the emerging regional plan. Figure S-2 provides a summary of the consultation, and responses. 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.

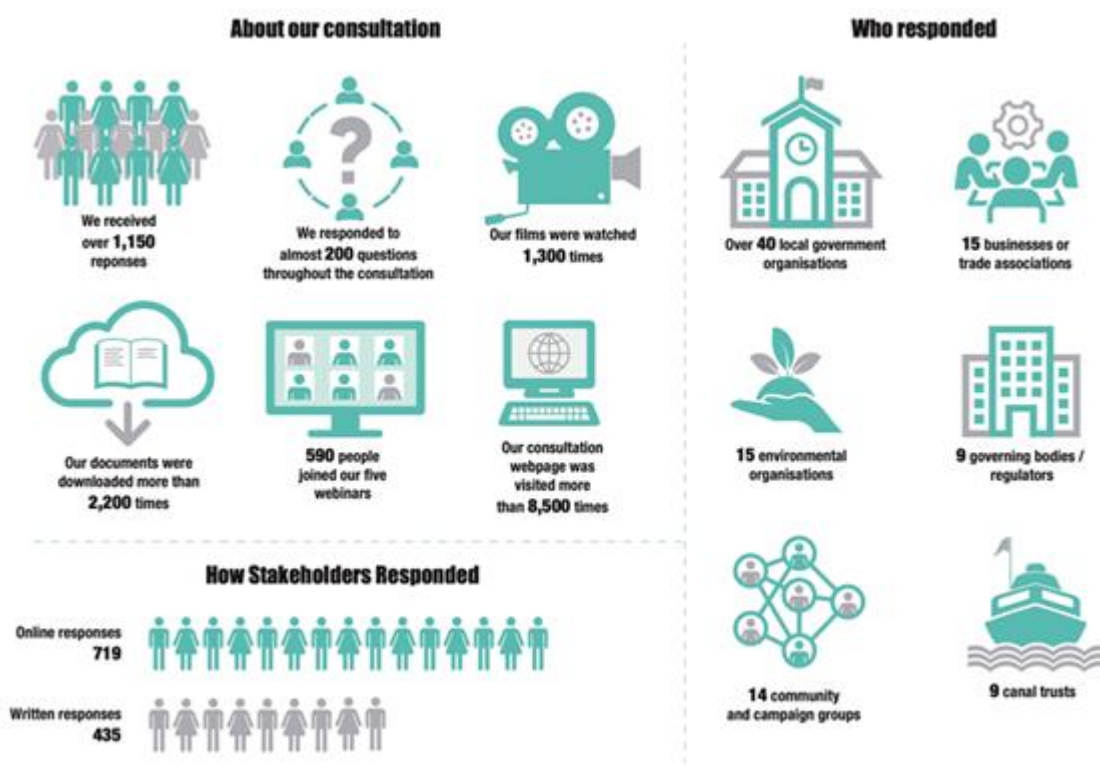


Figure S-2: The consultation on the South East emerging plan

S.32 WRSE published a response document¹⁰ 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.33 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 that has

¹⁰ WRSE Emerging Regional Plan: Consultation Response Document, May 2022

been developed, the proposals for significant leakage and water efficiency measures, as well as greater protection for the environment through abstraction reductions.

S.34 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.35 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 committed to continue to work with stakeholders as plans for these large schemes progress, sharing information when it was available.

Pre-consultation on our WRMP24

S.36 Our WRMP24 closely reflects the South East regional plan and as outlined above we worked closely with WRSE on the engagement to inform the development of the regional plan, which directly supported our WRMP pre-consultation activities, ensuring a clear and coordinated approach for stakeholders.

S.37 To compliment the engagement led by WRSE on the regional plan we 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 it has presentations from WRSE, Thames Water, Affinity Water and independent topic experts. Its purpose is to update stakeholders on our work, 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
October 2023	Presentation of our revised draft WRMP following consultation, response to representations made and subsequent updates to the draft plan

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

S.38 We have also engaged with statutory and non-statutory consultees on a one-one basis to share information on our WRMP24 and listen to their feedback. An overview is presented in Table S-2.

Consultee	Scope of discussions
Environment Agency (EA)	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. We have also held monthly 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. 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. In addition, we have engaged with the EA, through RAPID, focused on the strategic resource options.
Ofwat	We have held two pre-consultation meetings with Ofwat (January and May 2022) to cover the components on the draft WRMP24 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. Thames Water has on-going engagement to discuss a wide range of matters, these meetings will also cover water resources such as the drought, planning for dry weather, leakage activity and schemes.
Natural England (NE)	We have held three meetings with NE to discuss relevant aspects of the WRMP24, the topics discussed include: • 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 • Our review of emerging policy changes, particularly where this meant that options needed to be rejected on environmental grounds • Our work with WRSE on SEA scoping and the programme for the environmental assessment of our draft plan • Catchment options

Consultee	Scope of discussions
Drinking Water Inspectorate (DWI)	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. We also held a pre-consultation meeting with the DWI in September 2022 where we provided an update on the work to develop the WRMP24 and sought feedback on any concerns.
Historic England (HE)	We engaged with Historic England in the preparation of the SEA, alongside wider stakeholders. We have also had initial discussion with Historic England on a number of the strategic resource options that are under investigation.
NRW & Welsh Government	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 mainly on the aspects which could affect Welsh resources and the people of Wales.
Oxfordshire - Elected representatives (MPs, county, district and parish councillors), and local council officers	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 provided the opportunity to have conversations on the planning process, policy and technical aspects of the WRMP24 and to listen to issues and concerns. This is in addition to Officer engagement on the strategic resource options.
Across TW supply area - Elected representatives (MPs and county and borough councillors), local council officers	Meetings with politicians, elected representatives and local authority officers beyond Oxfordshire on water resources planning and to introduce the draft WRMP24 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.
Environmental NGOs	Engagement with environmental NGOs such as Chalk Streams First to identify opportunities for partnership working and potential schemes to help to protect and improve the environment.
Catchment partnerships	We have representatives on all the catchment partnerships in Thames Water's supply area and have raised awareness with them of the work to develop the regional plan and our WRMP24. We also publish updates in our Environmental Newsletter which is sent to over 30 partnerships of over 200 NGOs across our supply area.
Wide stakeholder community	In addition to the 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.

Consultee	Scope of discussions
Other water companies, Waterwise, MOSL, and retailers	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.
Housing Developers	We work proactively 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	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: • Request for proposals for water resources in the Official Journal of the European Union (OJEU) • Bilateral discussions with other water companies • Discussion with business organisations 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.

Table S-2: Overview of engagement with statutory and non-statutory consultees on our WRMP24

S.39 We sent a letter to over 200 stakeholders in 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 WRMP24 planned for Autumn/Winter 2022. The letter is provided in Annex 3.

S.40 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 1 and 2 reports¹¹ for each of the options.

¹¹ www.thameswater.co.uk/sro

Public consultation

S.41 We sent our draft WRMP24 to the Department for the Environment, Food and Rural Affairs on 3 October 2022 for national security and commercial confidentiality checks and provided a statement certifying that the draft WRMP24 did not contain any information that would compromise national security interests. Some option cost data was redacted on grounds of commercial confidentiality.

S.42 On 9 November 2022 we received a letter from Department for the Environment, Food and Rural Affairs (Defra) which requested additional information to be provided in relation to the operability and the deployable output of the Gateway desalination plant and mitigation for the Teddington Direct River Abstraction scheme prior to approval of our draft WRMP24 for public consultation. We engaged¹² with the Environment Agency and provided the information requested to fully address their concerns and resubmitted our draft WRMP24 to Defra on 25 November 2022. On 7 December 2022 Defra advised that we could publish our draft WRMP24 for public consultation.

S.43 We ran the public consultation over a 14-week period, from 13 December 2022 to 21 March 2023 to seek feedback from customers, stakeholders and regulators on our proposals. We chose to consult for the longer time period recognising that Christmas fell within the consultation period and to ensure there was sufficient time for consultees to respond to the consultation.

S.44 WRSE and the other South East water companies consulted on their draft plans over broadly the same time period, with the consultation on the draft South East regional plan open from 14 November 2022 to 20 February 2023. We explained to stakeholders that there were multiple consultations on the draft regional and draft company WRMPs, that the consultations were separate consultations, and that submissions should be made to each organisation, as relevant, to ensure representations were fully considered.

S.45 We published our draft WRMP24 on our dedicated consultation website www.thames-wrmp.co.uk along with details about the public consultation, how to participate and the information events planned during the consultation period. We also made paper copies of the draft WRMP24 available to view throughout the consultation period, by appointment, at our offices in Reading and at the information events.

S.46 On 13 December 2022 we wrote to over 2,000 stakeholders and interested parties, including all statutory consultees, third party organisations, retailers, developers and stakeholder organisations who had participated in our water resources stakeholder fora and stakeholders who had participated in the public consultation on our previous Water Resources Management Plan (WRMP19) to advise them of the start of the public consultation on the draft WRMP24. We provided a web link and details of how to participate in the public consultation. Annexes 4, 5 and 6 provide the emails that were sent at the launch of the consultation; during the consultation (10 March 2023) and prior to the close of the consultation (20 March 2023) to remind stakeholders of the consultation and encourage their participation.

S.47 We promoted the draft plan and the consultation through a range of media channels. We engaged with national and local media proactively to raise awareness of the consultation on the draft plan and reactively to respond to media enquiries. We also used social media using both organic posts and paid for advertising.

¹² Meeting held on 16th November, TW provided a formal note on 17th November, EA provided confirmation on 22nd November that the issues had adequately addressed

S.48 We held meetings with regulators and stakeholders during the consultation period including with Ofwat, the Environment Agency, Natural England, South East Rivers Trust, Maidenhead to Teddington Catchment Partnership and the Water Conservators to explain the draft WRMP24 and provide the opportunity to discuss aspects of the plan.

S.49 We offered briefings and meetings to MPs, elected councillors and local planning authorities in our area who could be affected by aspects of the draft WRMP24. We met several local planning authorities, both political representatives and officers including the Greater London Authority, London Borough of Richmond, the Vale of White Horse District Council as well as attending meetings hosted by other organisations including a scrutiny committee meeting hosted by Oxfordshire County Council.

S.50 We invited over 200 organisations to join a forum on 31 January 2023 in London to discuss the draft WRMP24, raise awareness of the public consultation and encourage feedback.

S.51 We held five community information events located in communities close to the proposed locations of the new water resource schemes included in our draft WRMP24. The locations were Richmond, Abingdon, Cirencester, Steventon and Twickenham. We also held four “pop-up” exhibitions during the consultation period in some of the main population centres in the Thames Water area at London Paddington station, the Oracle in Reading, Westgate Oxford and the Brunel centre in Swindon.

S.52 We hosted an evening online webinar specifically on the Teddington Direct River Abstraction scheme in response to a high level of interest in the scheme at which attendees could ask questions about the draft plan and the scheme. We published a detailed question and answer document after the webinar.

S.53 An overview of the community events that were open to all interested stakeholders is provided in Table S-3 with the number of attendees.

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

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

S.54 We also raised awareness amongst our employees through presentations and internal communications channels to promote the consultation and asked that the information be cascaded to families and friends thereby increasing the reach.

S.55 During the consultation period we received enquiries from stakeholders, Environmental Information Requests and queries from regulators. We addressed all these contacts in a thorough and timely manner.

S.56 We set up a dedicated email address (info@thames-water.co.uk) to answer any questions or comments in relation to the consultation or the draft WRMP24.

S.57 Consultees were able to make representations on the draft WRMP24 using an online survey, by email or post. We ensured all representations were shared with Defra in compliance with legislation¹³ and agreed the process for this with Defra.

S.58 We received 1,687 representations to the public consultation. We worked with an independent consultancy to log, code and analyse the representations. Full details on the consultation and representations to the consultation are presented in the WRMP24 Statement of Response¹⁴.

S.59 Noting that participation in public consultations is self-selecting i.e. respondents tend to have a particular point of issue or concern and as such, they are not always representative of the general population and our customers, we also undertook research with our customers. The aim of the research was to ensure we understood and could take proper account of the views of our customer base. This is reported in Appendix T.

S.60 We intended to publish our Statement of Response on 13 June 2023, 26 weeks after the start of the consultation in line with the WRPG and legal requirements. However, to allow us to consider the responses received thoroughly and coordinate with other water companies and the regional plan we, alongside WRSE and the other South East companies, requested an extension to the timeline for publication of the Statement of Response. On 19 June 2023 Defra approved the extension to the timeline to 31 August 2023 for publication of the Statement of Response and the revised draft WRMP24. WRSE and the South East water companies all agreed to work to this timeline to ensure our plans were consistent and could be reviewed together.

S.61 On 12 June 2023 we wrote to everyone who had responded to the consultation to advise them of the change of date. This email is provided in Annex 7.

S.62 We published a statement of response on 31 August 2023 in which we set out the points raised in the consultation and our consideration of them, alongside changes to the draft WRMP24 in response to the representations and new information. We published the statement of response on our consultation website www.thames-wrmp.co.uk and emailed everyone who participated in the consultation. We also published our revised draft WRMP24 at this time.

¹³ Section 37B of the Water Industry Act 1991, and regulations 2 and 3 of the Water Resources Management Plan Regulations 2007

¹⁴ The Statement of Response is published on www.thames-wrmp.co.uk

Strategic resource options

S.63 There is ongoing work to investigate and develop strategic water resource solutions¹⁵ 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.64 The gate 2 regulatory submissions for the standard strategic resource options¹⁶, were submitted to RAPID on 14 November 2022, and were published on our website www.thameswater.co.uk/sro. These submissions presented the feasibility and conceptual design work on the strategic water resource solutions. Interested stakeholders were then able to consider the gate 2 information alongside the draft WRMP24 documentation enabling them to provide full responses to the public consultation on the draft WRMP24.

S.65 RAPID has been clear that the decision on whether or not a solution goes ahead will be made through the 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.

S.66 The interaction between the regional planning, statutory company-level WRMP planning processes and the gated process for potential strategic water resource solutions, in respect of a timeline, is shown in Figure S-3.

¹⁵ To read about strategic resource solutions go to Section 7 of the revised draft WRMP24 or Ofwat's website.

¹⁶ To read about the regulatory gated process and RAPID go to [RAPID - Ofwat](#)

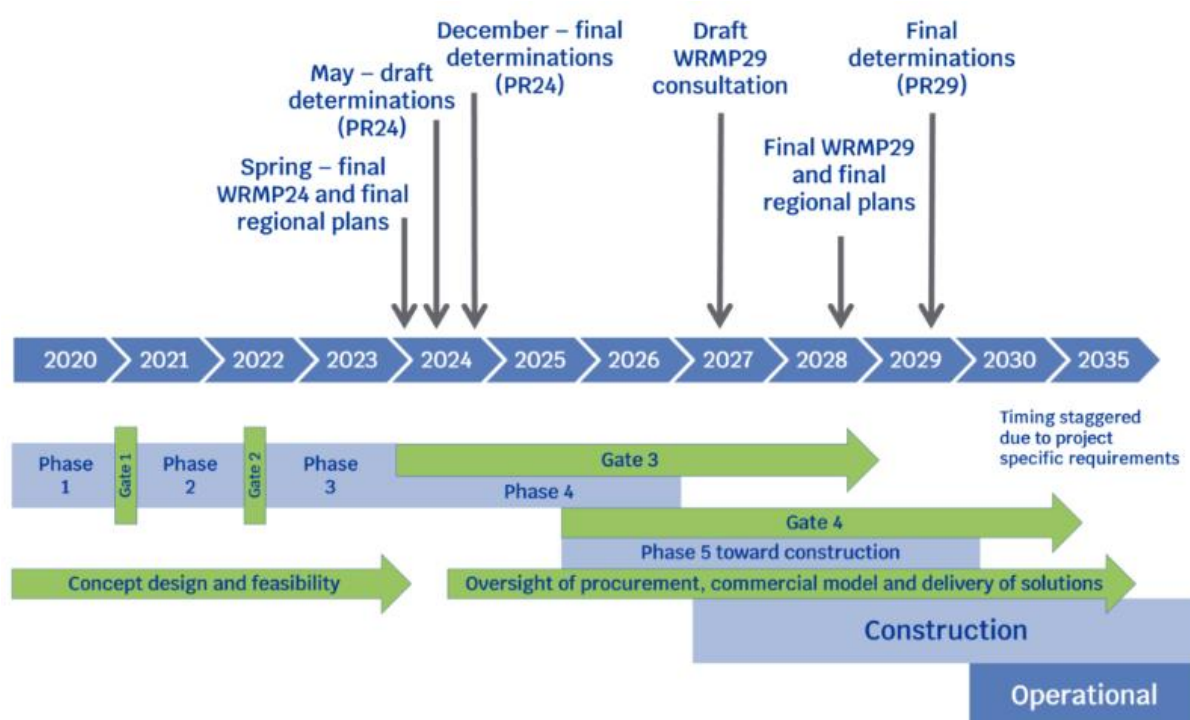


Figure S-3: Timetable of the gated process for strategic resource solutions¹⁷

S.67 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.68 RAPID published its draft decision on the gate two submissions on each of the solutions on 30 March 2023. They then undertook a representation period on their draft decisions on the gate 2 submissions until 11 May 2023. Representations 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. RAPID provided their final decisions, taking account of representations, on 28 June 2023.

S.69 Information about each of the solutions that Thames Water is involved with, including the technical reports, additional information provided to RAPID and feedback from RAPID, is available on our website www.thameswater.co.uk/sro.

S.70 There is interest in each of the solutions in the local communities as reflected by the number of representations received to the public consultation on the draft WRMP24 in relation to these schemes. Thames Water has appointed dedicated Engagement Managers for each of the three SROs that would potentially provide additional water resource for the Thames Water catchment, namely Teddington Direct River Abstraction, the new reservoir in Oxfordshire and the Severn to Thames Transfer. There is ongoing work on these options in line with the gated process, agreed with RAPID, and we are proactively engaging with MPs, local planning authorities, both elected representatives and officers, and local communities to share information in a timely way, to listen to feedback, and to respond to queries and questions, this activity is not reported in this

¹⁷ Ofwat website, <https://www.ofwat.gov.uk/regulated-companies/rapid/the-rapid-gated-process/>, August 2023

Appendix but it will be reported as part of the regulatory gated submissions and other relevant SRO documentation.

Engagement since publication of our Revised Draft WRMP24

Engagement with Regulators

S.71 The Secretary of State reviewed our Statement of Response with technical advice provided by our regulators. On the 5th February 2024 Defra requested further information on fourteen issues in relation to our revised draft plan and Statement of Response. On 29th April we provided information to Defra addressing the issues raised, detail of which can be found in the Statement of Response Appendix: Defra Request for Information.

S.72 Further to the request for information made by Defra, the Environment Agency issued an Annex providing further detail on issues raised to Defra as part of its review of our revised draft WRMP24, and additional recommended actions to improve the plan. Detail of issues raised, our consideration and any changes to our WRMP as a result can be found in a further Appendix to our plan.

S.73 On 21st August 2024, the Secretary of State approved our WRMP24 for publication, with recommendation made that final approval from regulators that issues raised had been addressed to the necessary standard. We have engaged with the Environment Agency, Ofwat and Natural England on issues raised and action taken to ensure acceptability within our final WRMP24.

Engagement on Strategic Resource Options

S.74 A dedicated engagement team for each SRO has engaged with local communities and stakeholder groups on SRO schemes specifically as the projects develop. Engagement has typically taken four forms;

- Public information events to inform local communities and stakeholders on project plans and developments in design, operation and risk mitigation
- Non-statutory consultations to seek input and views from local communities and stakeholders on key concerns and priorities to consider as the project develops
- Technical briefings to local authorities and stakeholder groups to discuss technical detail, mitigation of risks and maintain a clear understanding of others' priorities and commitments
- Project briefings to local MPs whose constituency is local to one of the SRO sites. Letters have been sent to MPs offering personal briefings and inviting them to attend events to meet the team, view materials and address any queries or concerns.

S.75 Two public information events were held in November 2023 to communicate project updates for SESRO with a total of 367 attendees.

S.76 Seven events were held in June 2024 to support a non-statutory consultation on SESRO design elements. The series of events attracted 1276 attendees with a total of 1598 representations made to the consultation which closed in August 2024.

S.77 Four events were held between October and December 2023 to support a non-statutory consultation on site options for the Teddington DRA. The series of events attracted 743 attendees with a total of 2312 responses to the consultation.

S.78 Four public information events are scheduled for October 2024 to support dissemination of the Statement of Response on the 2023 non-statutory consultation and communicate updates to the project as a result.

- S.79 Technical teams leading the design of the SROs have met with regulators to discuss risks and options for mitigation in order that the scheme can progress through development and the consent process, providing the required Deployable Output in line with our plan. Such engagement will continue as the scheme develops and will be reflected in the Gated documentation overseen by RAPID.

Annex: Changes Made Between Plan Iterations

S.80 The text in the boxes below summarises the changes made to this Section between dWRMP24 and rdWRMP24, and rdWRMP24 and final WRMP24.

Detail added on public consultation activity for both the draft regional plan led by WRSE and our draft WRMP24 including schedule of events, engagement with MPs, elected councillors and planning authorities. Information included on the number of representations received, how these were responded to in our Statement of Response to consultation.

Changes made between dWRMP24 and rdWRMP24

Changes made between rdWRMP24 and final WRMP24

New detail added to cover stakeholder engagement in the period between publication of our revised draft and final WRMP.

Annex 1 – Membership of WRSE stakeholder groups

S.81 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

S.82 Chair: WRSE Organisational Director

S.83 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

S.84 Regulators invited as observers.

Environmental Advisory Group

S.85 Chair: WRSE Organisational Director

S.86 Members:

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

Multi-sector Advisory Group

S.87 Chair: Kent County Council (following retirement now independent)

S.88 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
October (13)	Stakeholder Advisory Board (SAB)	Regional policies consultation Best Value Plan – criteria and metrics Customer research update

Date	Stakeholder group/activity	Agenda/Discussion topics
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 and stakeholders; update on South East planning challenge
May	Future Water Resource Requirements	Publication setting out the planning challenge for the South East

Date	Stakeholder group/activity	Agenda/Discussion topics
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 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		
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

Date	Stakeholder group/activity	Agenda/Discussion topics
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 South East
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 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

S.90 Note the engagement is recorded up to July 2022, thereafter the focus turned to the preparations for the public consultation on the draft South East regional plan and the water companies own draft WRMP24. Each water company then designed an engagement programme to support their own public consultations which we have reported in this Appendix.

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](#)¹. 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 3rd 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).

Water Resources Management Planning

We are required to follow the [Water Resources Management Plan Regulations 2007](#)² and the [Water Resources Planning Guideline](#)³ 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.

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

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

³ <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 200MI/d of supply capability for our customers, and a further 100MI/d 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](https://nic.org.uk/studies-reports/national-infrastructure-assessment/national-infrastructure-assessment-1/preparing-for-a-drier-future/)⁴ and the [National Framework for Water Resources](https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources)⁵, 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](#)⁶). 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 MI/d to over 500 MI/d in the long-term. We will need to undertake a significant volume of investigations

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

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

⁶

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)

Best regards,

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

Annex 4 – Letter sent to all statutory and non-statutory consultees plus interested parties advising them of the start of the public consultation, December 2022



Today marks the start of a public consultation on the future of our water supply

Substantial water shortages face the whole of the south east of England. The extreme heat and lack of water we had over this summer make it clear that this situation is likely to get worse. We have worked closely with Water Resources South East (WRSE) and our neighbouring water companies - Affinity Water, Portsmouth Water, SES Water, South East Water and Southern Water - to plan ahead and build future resilience for the benefit of our customers now and in the future, and the environment.

Our draft Water Resources Management Plan 2024 sets out the predicted water supply shortages and how we intend to provide a secure water supply for our growing population; protect against the growing risk of drought; and improve the environment over the next 50 years. Our plan sets out ambitious reductions in leakage, actions to reduce the amount of water we all use and investment in new infrastructure including a new river abstraction in west London, a new reservoir in Oxfordshire, and water transfers between regions and across the South East.

We want to hear what you think

We're consulting on our draft plan until 21 March 2023. You can read a summary of our draft plan, and the detailed technical reports, and have your say on our dedicated consultation website www.thames-wrmp.co.uk. Tell us what you think, your feedback will help us to refine our draft plan. We'll carefully consider all the responses we receive and in June 2023 we'll publish a report setting out how we have taken the comments into account in revising our draft plan.

Throughout the consultation we're holding information events across our area including in Cirencester, Abingdon, Richmond and Steventon to give you the chance to talk to us about our draft plan and give us your feedback. Details of where we will be and when are on our website www.thames-wrmp.co.uk/events.

WRSE is also consulting on the draft regional plan and the other SE water companies are carrying out statutory consultations on their individual dWRMP24s. These are separate consultations, which explain how each company will secure supplies for their customers. Links to each company's website, where you can find out more, are set out below.

- [WRSE](#)
- [Affinity Water](#)
- [Portsmouth Water](#)
- [SES Water](#)
- [South East Water](#)
- [Southern Water](#)

You are receiving this email because you have previously engaged with us on water resource matters or are a named consultee in the Water Resources

Planning Guideline. If you do not want to receive emails in connection with water resources or the draft WRMP please click unsubscribe to request to be removed from this mailing list.

If you have any other questions or need help with the consultation, please email info@thames-wrmp.co.uk.

With best regards,

Tony Owen
Head of Water Resources
Thames Water

Our draft Water Resources Management Plan 2024 covers a 50-year period, from 2025 to 2075 and sets out how we intend to meet future challenges and build resilience for the benefit of our customers, their children, grandchildren and the environment. Our draft plan has 3 parts:

- A summary
- Main Report - Sections 1-11
- Technical appendices and supporting information

Go to thames-wrmp.co.uk to read our draft plan and join the conversation

Our privacy notice covering the use of personal data for consultations can be found [here](#). To find out more about how we use and protect personal data including your data subject rights please visit our main website ([Privacy policy](#) | [Legal](#) | [Thames Water](#)).

Annex 5 – Letter sent to all statutory and non-statutory consultees plus interested parties to remind them of the public consultation, February 2022



Hello,

We wanted to remind you that the consultation on our draft Water Resources Management Plan, which sets out how we propose to provide a secure and resilient water supply for customers now and in the future, will close on the 21 March 2023.

It's really important that we hear from you, so please visit our consultation website www.thames-wrmp.co.uk to read a summary of our draft plan, and the detailed technical reports, and let us know what you think. You can fill in the online form on the website or you can email your feedback to both consultation@thames-wrmp.co.uk and the Department for Environment, Food and Rural Affairs (Defra) at water.resources@defra.gov.uk.

If you have already provided your feedback, thank you.

We'll carefully consider all the responses we receive, and in June we'll publish a report which sets out our consideration of the feedback and the changes we've made to our draft plan in response.

Best regards

Thames Water team

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Annex 6 – Letter sent to all statutory and non-statutory consultees plus interested parties to remind them of the close of the public consultation, March 2023



Hello,

The consultation on our long term plan for water supply closes tomorrow - 21 March 2023. You can read our draft plan and provide your feedback using our online survey www.thames-wrmp.co.uk or by email to both consultation@thames-wrmp.co.uk and the Department for Environment, Food and Rural Affairs (Defra) at water.resources@defra.gov.uk.

We'll consider all the feedback we receive, and in June we'll publish a report which sets out our consideration of the feedback and the changes we've made to our draft plan in response.

Tell us what you think.

Best regards

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Annex 7 – Letter sent to all respondents to the public consultation advising them of the revised date for the publication of the statement of response, June 2023



Update: Water Resources Management Plan public consultation

Thank you for participating in the public consultation on our draft Water Resources Management Plan (draft WRMP), which set out how we intend to provide a secure water supply for our growing population; protect against the growing risk of drought; and improve the environment over the next 50 years.

The public consultation closed in March 2023 and we are grateful for all the feedback we received – over 1,680 representations. Since the close of the consultation we have been reading the responses and preparing our Statement of Response, which will set out our detailed consideration of the feedback and the changes that we have made to our draft WRMP.

We are continuing to work closely with Water Resources South East and the other South East water companies as we revise our draft WRMP. This includes responding to the feedback we have received from stakeholders and customers, incorporating new requirements from government and regulators

and updating information about individual schemes such as costs, delivery dates and environmental information.

To allow us to complete the technical work for the regional plan we have received agreement from Defra to delay our Statement of Response for publication by the end of August. The South East regional plan and all the South East water companies will also move to this timeline, to ensure our plans are consistent and can be reviewed together.

We appreciate that many people are keen to understand how their feedback has been considered and see the next version of the draft WRMP, however it is vital that we carry out the next phase of work thoroughly and use the most up-to-date information to ensure our WRMP remains robust and evidence-based.

We look forward to sharing our Statement of Response and revised draft WRMP with you and will notify you once we have published the documents.

In the meantime, we will continue work on the strategic resource options set out in the draft WRMP, in line with the gated process agreed with our Regulators.

If you have any questions please do not hesitate to get in touch via info@thames-wrmp.co.uk.

With best regards,

Tony Owen
Head of Water Resources
Thames Water

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