Statutory Pre- Consultees	Named Contact/Date	Substance of Response	SST Action
Ofwat (from SST's pre-consult)	Sent Margaret Read 27.07.22	 Our long term reference scenarios should be considered as part of the best value adaptive plan assessment, please refer to 1) Ofwat's final guidance on long-term delivery strategies at PR24 and 2) the clarification on the approach agreed at the Regional Coordination Group (RCG) with us and the Environment Agency around the common reference scenarios for abstraction reductions, which was recently communicated to company regulation directors and WRMP leads (WRPG section 10.8). We are expecting companies to make significant effort on demand reduction. Companies should set out informed and efficient glide paths to meet company and policy targets. o You should include detail within your WRMP annual review 2021-22 and your draft WRMP24 of how recent actual data is informing and reducing uncertainty and strengthening confidence that these targets are deliverable. This should include improved understanding of demand following the Covid-19 pandemic. We encourage consideration going forward, through sensitivity analysis, of the combined impact of new hybrid ways of working and dry weather not experienced in recent actual data and the impact this may have on the dry year uplift (WRPG section 6.1). o You should fully consider our PR24 draft methodology requirements on leakage and meeting the 50% reduction target by 2050. We have a minimum expectation for all companies to plan to meet the 50% reduction in leakage by 2050 on an individual basis. This is consistent with both long-term government targets and the commitment made by English companies. This expectation and the exceptional circumstances where companies can propose leakage targets less than the 50% reduction are discussed in further detail within our PR24 draft methodology. We expect you to take account of the expectations set out in our PR24 draft methodology in developing your draft WRMP24. [Ofwat, 'Creating tomorrow, together: consulting on our methodology for PR24 Appendix 9 - Setting expenditure allowances', Section 5.2.3 Lo	Common reference scenarios used for testing the plan, as agreed between regional planning groups, Ofwat and EA. These include Ofwat compound high and Ofwat compound low scenarios Our preferred plan includes the public interest commitments of 50% leakage reduction by 2050, with a trebling of the rate of reduction, and 110 l/h/d PCC by 2050. In addition, we also include 9% NHH consumption reduction by 2037, in line with the proposed Environment Act targets. The plan includes comparison of the available supply and demand options. Our WRMP also shows how this is supported by our extensive customer research programme, and our methodology for testing the choices with our customers.
		We request that you check and confirm in combination assessments including for	Our options screening and selection for

environment and deployable output at the programme level as part of best value plan assessment (WRPG section 10).	the preferred plan has considered in combination effects both for WRMP and in the WRE plan
• We are expecting to receive an updated and fully completed pre-consultation data table (provided alongside the pre-consultation briefing pack) once your decision-making process is complete and your preferred draft best value plan is available (WRPG section 3.4). These tables should be submitted to us in advance of and in addition to the WRMP data tables that you will submit alongside your draft WRMP. Early sight of proposed draft level of investment (£m for 2025-30 and beyond) in terms of base and enhancement expenditure prior to draft WRMP24 submission, and any potential related cost adjustment claims, is particularly important.	Completed in January 2023
• Costs presented at the final WRMP24 stage are expected to be the same as those submitted into business plans at PR24 (WRPG section 8.3.1). Given the short time between final WRMP submission and PR24 submission this should be achievable. If there could be significant changes in your plan post draft WRMP24 (in particular on the plan's costs, expected benefits and impact on the environment), you should consider how these will be managed within your overall consultation process and the timeline for submission of your business plan. (WRPG section 3.3).	Our WRMP will be mandated into our PR24 submission, including costs. Whilst these costs may be subject to refinement between the draft WRMP and PR24 submissions, they will be aligned as far as possible.
• You should fully and robustly show evidence and explain in the narrative any significant changes to your supply demand balance, especially regarding any decreases in deployable output. You should clearly show and explain how the benefit of funded schemes have been factored into your supply demand balance for WRMP24 (WRPG section 1.4.5 and section 3.3.3).	Included in narrative of the plan
• You stated that there was uncertainty surrounding licence capping impacts. We expect you to continue to discuss with the Environment Agency, opportunities for any flexibility in meeting the licence reductions in the short term to support optimal solution development and reduce risk to supply. We encourage you to thoroughly discuss this position with the Environment Agency in advance of submission of your draft WRMP24. You should ensure you have undertaken thorough optioneering of all feasible solutions to address this issue and provide robust evidence of this in your draft WRMP24 (WRPG section 8). We understand that there is a potential impact on the regional plan of licence capping on non-public water supply (PWS) licences and therefore there may be a need to include a greater non-PWS component in the regional plan and/ or you may need to factor in an increase in PWS demand from non-household sectors should direct	In our plan, we have included the agreed licence caps for AMP8 in our sustainably change figures, both for licence capping as agreed with ethe Environmental Agency, and for environmental destination consistent with WRE for the BAU+ scenario. Our options include consideration of Reg 19 and deferment of licence capping as discussed with the EA

abstractors wish to switch to PWS as a result of licence reductions. We reiterate that at the company level the plan should be PWS only.	
• There is a need to ensure that abstraction reductions are not double counted when licence capping is combined with environmental destination scenarios and we request more detail on board assurance and engagement on near term risk of licence capping (WRPG section 5.4.1).	In our plan, we separated the licence reductions as they are phased for licence caps and environmental destination, to ensure there is no double counting.
 WRMP schemes should have some benefit to or impact on one or more components of the supply demand balance. (WRPG sections 8.2 and 9.2). There has been no change in the joint regulator guidance on this point. All communication on this has been in line with the WRPG and supplementary guidance. We provide the following as clarifications in accordance with the guidance: o Catchment and nature based solution (C&NBS) options that have a WAFU benefit to supply-demand balance can be promoted via the WRMP and should feature in the WRMP data tables. o All schemes that are presented in WRMPs should include the full costs of delivery to deliver the presented WAFU benefits. The costs of delivering 10% biodiversity net gain (to gain planning permission where this is necessary) should be included in option costs prior to option appraisal. We note that biodiversity net gain may be delivered through the option itself at no additional cost, onsite provision or offsite as part of a wider C&NBS. (WRPG section 4.1.1 and supplementary guidance 'Environment and society in decision-making (England)' section 2.3.2). o C&NBS addressing another primary driver relating to company activity (e.g. improving water quality) should be presented in appropriate enhancement lines in business plan. These can be discussed within the narrative of the WRMP to provide evidence and justification of need. 	Noted and incorporated
• Sub zonal schemes (not impacting on zonal WAFU) can be discussed within the narrative of the WRMP to provide evidence and justification of need but they need to be presented for funding with your business plan rather than your WRMP. Interconnection required to deliver full WAFU benefit of the option can be included as part of WRMP option level cost and benefit. (WRPG reference 8.3.1).	No interconnectors required. Any sub zonal schemes will be included in PR24
• It is your responsibility to maintain and manage your assets to ensure they are available when needed and that they are available and fit for purpose both under normal and peak operating conditions if relied upon in a WRMP. This is in accordance	Included as directed

 with your duty under section 37 of the Water Industry Act 1991. Your baseline water resources planning scenarios should include the benefits of non-supply demand balance solutions such as capital maintenance (WRPG section 4.8). We expect companies to develop and present as part of their draft WRMP a monitoring plan which allows tracking of progress against the best value adaptive plan. The monitoring plan should support ongoing review of supply demand balance forecasts and performance against key metrics and outcomes including option delivery. The monitoring plan should enable identification of triggers for when key decisions need to be made and action taken (WRPG Section 3.9, 6.4 and 10.3). 	No adaptive plan required as the least cost plan and best value plan are the same, and no additional options are available for selection as detailed in the WRMP. Options are included as soon as available so no scope to select earlier. However progress against the WRMP will be monitored annually through the WRMP annual return process, with reference to any new regional options from WRE
• You should present evidence in your plan that you have fully considered a range of options, including a large range of supply-side and demand-side options, range of option sizes and option lead in times. This will ensure that model inputs do not artificially skew programme selection and ensures that proposals are likely to be optimum over a range of operating conditions and future scenarios.	All options included
• Regarding solutions with expected low utilisation rates, in line with what we said in our expectations for strategic planning frameworks for PR24 (page 8)2 we expect full consideration of planned operational interventions, where these are appropriate, for example during low probability events. We would like evidence presented in your WRMP that planned operational interventions have been considered and will be implemented where appropriate if this is the best value solution. This will help to avoid developing unnecessary infrastructure which may have very low utilisation or not be required if the risks do not transpire. You should include in your WRMP24 narrative robust evidence fully explaining and justifying the utilisation rates given. You should include explanation and evidence you have fully tested utilisation rates and explored modularity and scalability in optioneering in managing low utilisation situations and future need uncertainty (WRPG section 4.7).	N/A
• You should present evidence in your plan that you have fully considered options with lower fixed costs and higher variable costs and if appropriate explored how revenues could be generated from multi-party use in low utilisation scenarios.	Included

		• Reporting should be maintained in the 20-21 price base for draft and final WRMPs rather than moving to 21-22 or 22-23. At business plan stage, we will request that you clarify that any changes in costs between final WRMPs and Business Plan submissions are solely due to price base updates and to confirm your assumptions. This is also consistent with the WINEP guidance.	Pricing included at 20/21 price base, specifically as Dec 2020.
		• Some companies have raised concern about stakeholder confusion regarding consultation and requested that regulators publish a simple guide to explain the need for parallel consultations. We understand that the Regional Coordination Group is working on two actions to address this. Firstly, a joint website across the regional groups and secondly a national summary document to be funded by the regions. This document is intended to also include a plain English description of the role of the various plans, the consultations and how they fit. We recommend that you engage in this process to make sure it meets your needs.	Completed
		• Company plans need to be clear on how the regional plan and company level objectives, metrics and outcomes align / deviate with differences clearly explained.	Included in WRMP
		• Any programme delays at the regional level need to be appropriately managed at the company level to ensure a robust and timely delivery of a fully assured and compliant best value plan which reflects customer and stakeholder views.	N/A
		• You stated that Cambridge Water is currently at a 1:500 level of drought resilience but falling into deficit as a result of licence capping immediately from 2025.	We are at 1:500 resilience by 2040 when all options are selected.
		• You explained that the need for a strategic option such as Fens Reservoir is being entirely driven by licence capping and environmental destination as growth is being addressed through demand management.	Correct – as per plan narrative
		• You suggested there may be the need for an interim short-term investment prior to a strategic scheme being constructed to meet this shortfall. This is likely to be a transfer from Anglian Water which will aid resilience in the longer term. We will require strong, robust evidence in your draft WRMP24 that all feasible options to mitigate this situation have been explored, that this is the best value solution for this situation and that this will not become stranded investment once the strategic option is constructed.	Included in options considered in the plan
EA (from SST's pre-consult)	Mike Stokes 10.03.22	Sustainable abstraction and environmental destination We expect your plan to account for the short-term regulatory requirements, as set out in the Water Resources Planning Guidelines, across your operating area. This should include measures to avoid WFD deterioration, ensure targets for Protected Areas are met, deliver actions to meet the Abstraction Plan for 2027 and actions required to achieve WFD regulations objectives as	We have included our agreed licence caps for AMP8 in the WRMP tables and into our SDB calculations. In addition, we have included BAU+ scenario in the planning tables for our environmental

		defined in River Basin Management Plans. We expect you to consider our emerging Water Industry National Environment Programme (WINEP) for PR24 for your company. We are concerned that you are not currently planning to achieve minimum regulatory commitments by 2050. You should work with us at a local level to generate a central scenario that builds on achievement of our National Framework for Water Resources Business As Usual scenario licence changes plus any additional licence changes required	destination approach.
		to meet Protected Area objectives. This central scenario should then underpin the Autumn 2022 draft plan. Your WRMP should clearly demonstrate your commitment to protect and improve the environment.	
		Adaptive planning approach You should consider how the move to an adaptive planning approach affects your WRMP target headroom choices.	N/A
		Wider issues to consider Government and regulators expect water companies to follow the water company water resources planning guideline when preparing their draft WRMP. Our latest revised guideline was released in December 2021 and has been jointly produced by the Environment Agency, Natural Resources Wales, the Welsh Government, Defra and Ofwat. If there are aspects of our guideline that you believe it will be difficult for South Staffordshire Water to follow then we'd welcome early dialogue on this.	We can confirm we have followed the WRPG. We also have Jacobs providing assurance on this, and then Board assurance also.
		To support our guideline, we have also produced a set of supplementary documents and templates that provide further information on specific topics. These include the supply-demand tables to be used for capturing and presenting water resources planning data to support your WRMP. These are all available from Sharepoint or upon request.	Noted
		Defra will be releasing 'guiding principles' which sets out advice for water companies in England. Government expects you to take account of the advice set out in this document when developing your WRMP.	These have been considered as part of the WRMP development
		Customer and third party involvement We encourage you to consult with a range of statutory and non-statutory stakeholders at this WRMP pre-consultation stage, including your customers, neighbouring water companies, environmental NGOs, Wildlife Trusts, local community and catchment groups.	We have undertaken a comprehensive customer and stakeholder engagement programme, as detailed in the WRMP narrative
EA (from CWC's pre-consult)	Sacha Moll 28.02.22	Supply demand balance (SDB) An increase in growth coupled with required reductions in existing abstraction produces an immediate water resources challenge for the company. The interim baseline SDB indicates a deficit of approximately 10 Ml/d from the outset of WRMP24. There are significant uncertainties surrounding these assumptions and ultimately the potential for much larger deficits. Water Resources East (WRE) is focussing on solving deficits at the regional scale and only considers larger longerterm	We have reviewed all options available and undertaken a full screening process as explained din the plan. All of our feasible options are selected, and we have considered WFD Regulation 19 OPI deferment of some licence changes in

options >10 MI/d. This leaves a significant gap in the short-term. WRE requires water	order to maintain security of supply in
companies and other sectors to develop smaller options to resolve the deficits. The	the short term whilst options can be
company has started work to identify options, but it is not complete, which poses a	implemented
significant risk to security of supply and the environment. The company must address its	,
public water supply deficits with options to increase supply and reduce demand and	
achieve an environmentally sustainable secure supply of water.	
Current abstraction. The company currently relies on abstraction from groundwater to	We have reviewed all options available
supply its customers and 97% is from chalk aquifers. We are obliged to take action to	and undertaken a full screening process
review current abstraction licences and reduce licensed quantities where we consider	as explained din the plan. All of our
there is deterioration risk from increasing abstraction within licensed limits above	feasible options are selected, and we
historic levels of abstraction. We are continuing our conversations with all water	have considered WFD Regulation 19 OPI
companies on how this will affect current licences, but the reductions required are	deferment of some licence changes in
expected to be significant and may cause large discrepancies between the forecast and	order to maintain security of supply in
actual baseline SDB. We expect the company to demonstrate in its plan that its	the short term whilst options can be
abstraction is sustainable now and long term. As part of the Chalk Stream Restoration	implemented. We will be including river
Strategy, we are calling an end to unsustainable abstraction and expect your plan to	restoration schemes in our WINEP to
protect and improve the environment, considering both current and future challenges.	support the short term protection of
We understand the company has nominated the River Granta as part of the Flagship	the environment, as the appropriate
Catchment Restoration Project and expect the company to continue to work	mechanism to identify and progress
collaboratively with partners on the chalk stream restoration group.	investment.
Supply options We consider that the company has a relatively small number of short-	Our options have been through a
term sustainable supply options available to resolve its deficits. The options to trade or	screening process to ensure they are
transfer water with neighbouring water companies are highly uncertain due to the likely	robust, appropriate to the level of
need to apply stricter caps to groundwater licences to prevent deterioration. We expect	information available.
the company to avoid relying on uncertain supply options and to work together with	
WRE and other abstractors to develop and include additional smaller and shorter lead	
time supply options to meet forecast deficits.	
Environmental ambition We expect the company to clearly differentiate between the	The costs associated with
certain and the uncertain components of its environmental ambition. A clear definition	environmental destination scenarios
will allow the company to compare the preferred environmental ambition against a	are related to a single SRO, this is being
baseline of existing regulatory commitments. In turn this information should allow the	developed through RAPID and therefore
company to demonstrate which level of investment is required regardless of a greater	the costs are transparent and reviewed
environmental ambition. We expect the costs of environmental ambition scenarios to be	by regulators. The uncertainty of the
presented in a transparent manner, for example, if an enhanced scenario is an additional	long term environmental destination

cost, or whether some of the cost is needed to meet existing regulatory commitments.	numbers does not alter the selection of this option.
Growth The company faces significant population growth with various levels of uncertainty on the exact timing and final figures. The company must not plan to service future growth in demand through unsustainable increases in abstraction and we expect the company to balance both the needs of growth and the environment. We expect the company to consider, in detail, all relevant growth plan scenarios (including nonhousehold) and how these may impact on its SDB. The company must use robust and accurate data in its forecasts, we expect consistent data to be used across all aspects of future planning. We expect the company to consider stress testing its plan against the various levels of growth.	Growth in demand is offset through our demand management options as presented in the plan. There is a plead in period for these to become fully effective against a backdrop of growth already occurring or that is already planned in the near term. Our demand forecasts have been developed with WRE and informed by local plans, government aspirations and ONS data.
Demand for water The company has set out some initial demand options but not in enough detail to give sufficient confidence the measures will reduce demand to the sustainable levels needed to also support growth. Per capita consumption remains above the WRMP19 forecast and there has been a general trend of increasing Distribution Input over the last 10 years. The company has not demonstrated a step change to reduce demand and the reported data causes significant concern. We are highly uncertain whether the WRMP19 demand options were effective and therefore question whether WRMP24 will deliver the assumed savings or are sufficient to meet household and non-household demand in high growth areas. The level of uncertainty may increase the need for additional supply options to be developed and incorporated into the plan. We expect the company identify a range of effective demand management options and to demonstrate how these will significantly reduce demand. Several local growth plans set out water efficiency targets which are required to ensure that these plans are sustainable. We expect the company to be consistent with the plans/targets and demonstrate how its progress to reduce demand performs against the proposals in these plans.	We have incorporated the national targets and have included an ambitious demand management programme. Delivery to WRMP19 ambitions is published in our annual reviews and has previously been discussed. Whilst there are currently no additional supply options available, this will continue to be reviewed and and updated for subsequent WRMPs as required. We will monitor the effectiveness of our demand management programme over the next 5 years. Our plans are consistent with local plans and targets in effect at the time of publication.
Wider issues to consider We expect you to consider our emerging Water Industry National Environment Programme (WINEP) for PR24 for your company. Your WRMP should clearly demonstrate your commitment to protect and improve the environment.	We reference our intentions to include supporting measures in our WINEP. We have considered this report, and
We expect you to review the outputs of the Water UK project titled 'Water Resources	included WRE options as appropriate

		Long Term Planning Framework' and consider what it means for your company and the	
		range of resilience solutions you have considered. We would also expect solutions	
		identified for Cambridge Water through the WRE work to feature in your WRMP unless	
		there is a good very good reason for not doing so.	
		Customer and third party involvement We welcome your proposals outlined in your	Our engagement with customers and
		pre-consultation to consult with a range of statutory and non-statutory stakeholders,	other stakeholder continues outside of
		including your customers and neighbouring water companies. Given the focus on	the WRMP planning process
		ensuring resilience now and in the future, not only for public water supply but also for	
		the environment we would strongly encourage you to continue consultations and	
		discussions with groups such as environmental NGOs, local community and catchment	
		groups and wildlife trusts et cetera.	
CCWater	Christina	The supply and demand challenges facing Cambridge Water from increased growth,	Noted
	Blackwell	climate change and a reduction in groundwater supply to meet environmental	
	28.02.22	requirements are stark and require ambitious demand management and additional	
		supply side solutions. It is clear that large scale supply side solutions are being	
		considered by Water Resource East (WRE).	
		It is imperative that customers and stakeholders are informed of, and involved in, the	We have undertaken a comprehensive
		decision making process. We expect all the companies to test the affordability and	customer and stakeholder engagement
		acceptability of their WRMPs with customers. We commend you for the customer and	programme, as detailed in the WRMP
		stakeholder engagement carried out to date, and we welcome the steps taken to involve	narrative. We have also engaged Jacobs
		CCW and the Customer Panel in that engagement. However, given key decisions will be	to undertaken assurance on the line of
		made by WRE and WRW, we are concerned about how customers' and stakeholders'	sight between the outcomes of
		views influence those decisions. In your draft WRMP24 we want to see evidence of a	customer engagement and the plan
		clear line of sight between the outcomes of customer and stakeholder engagement and	developed.
		the options and decisions of both regional and company plans.	
		At present it is unclear whether there will be longer-term impacts of COVID-19 and how	Noted
		the changes of blended working arrangements, with many people spending more time 3	
		working from home, will impact available water demand. We acknowledge that more	
		work is needed to understand what the longer term effects of the pandemic are likely to	
		be and we would like to see more detail set out in the draft WRMP24.	
		Through our liaison with the company we have an understanding of many of the	There is additional detail on this
		demand management options being considered. However, we are less clear on the	proposal in our WRMP, and will
		special tariff to encourage water efficiency and the metering plans. We want to see	continue to discuss this option with
		more detail on these and discuss them with the company in the near future.	CCW as we progress towards PR24

		We welcome the commitment to reduce leakage in line with the public interest commitment. It is clear from the output of your recent customer research that customers of both South Staffs and Cambridge Water see this as being a high priority in supply/demand options.	Noted
		A significant supply side option being explored includes sharing water resources and making bulk transfers. We expect your customer research to establish any customer concerns and issues around water transfers and your draft WRMP24 to address these with clarity.	As documented in our research
		We welcome the approach to developing a best value plan, and the aim to develop multiple economic and social economic benefits. We look forward to seeing further detail on this in the draft WRMP24.	We can confirm there is further detail on this in the draft WRMP.
		Finally, we expect your WRMP24 to be in plain English and be user-friendly with the use of good infographics. Customers will respond better to clear, accessible documents, especially if they are shorter. Therefore, we would also like to see a customer focused shorter version of the main report.	We intend to produce a customer focused version of the main report and will work to produce this between the submission of the WRMP to regulators on 3 rd October and the publication of the documents for public consultation.
Wilbraham River Protection Society	Richard Townley 24.02.22	Should the current investigations required by WINEP3 into almost all of Cambridge Water's supply boreholes confirm a detrimental effect on local groundwater levels and require reduced abstraction, how and when will this be implemented?	We will implement any reductions to abstraction as soon as it is practicable. Where options are required there will be a lead time for investment and implementation.
		Will the results of these investigations be fully accounted for in Cambridge Water's WRMP planning?	Yes. We have included no deterioration abstraction reductions in our plan as agreed with the EA, and will further investigate environmental destination reductions in AMP8
		During the construction period of the Fen Reservoir, how will increased demand for water supply be managed?	We have considered a number of supply options and have proposed a demand management programme which will offset increases in demand
		Does WRMP planning include any proposals for increased water abstraction?	Supply options included will increase water abstraction, these will be environmentally sustainable

Are there likely to be any proposals in WRMP24 for increased abstraction on the basis of 'resilience'? We note that WRMP19 allowed the permanent re-activation of up to 5 dormant CW licensed boreholes with related increased abstraction for 'resilience' reasons.	Our supply and demand options include sustainable increase to abstraction and will ensure our resilience
When the reservoirs and transfer systems become operational is it expected that water abstraction from the chalk aquifer will permanently decrease? If abstraction persists during winter months how does the planning indicate this will vary by location and across the year?	We expect unsustainable abstraction licences to be permanently modified in future. It is unlikely that abstractions from the chalk will have seasonal variations.
Is the discontinuation of the inadequate Lodes/Granta Water Augmentation Scheme planned in the future water supply strategy? If not, why not?	This augmentation schemes is owned and operated by the EA