
love every drop
anglianwater
Draft WRMP24
Revised Statement of Response
UtilityWeek AWARDS 2021 WINNER
FT CLIMATE LEADERS 2022
27th March 2024

Draft WRMP24 Statement of Response

1. Introduction

1.1 About our company

Anglian Water is the largest water and wastewater company in England and Wales geographically, covering 20% of the land area.

We operate in the East of England, the driest region in the UK, receiving two-thirds of the national average rainfall each year; that's approximately 600mm.

Our region has over 3,300km of rivers and is home to the UK's only wetland national park, the Norfolk Broads.

Between 2011 and 2021, our region experienced the highest population increase in England. Despite this, we are still putting less water into our network than we did in 1989.

1.2 Planning for the Long Term

Our company Purpose is "to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop". This purpose is at the heart of our business, having been enshrined in our Articles of Association in 2019.

Central to delivering this purpose is planning for the long term; one of the strategic planning frameworks we use to achieve this is the Water Resources Management Plan (WRMP), which details how we will ensure resilient water supplies to our customers over the next 25 years.

A WRMP looks for low regret[1] investments for our region, giving flexibility to adapt to future challenges and opportunities such as technological advances, climate change, demand variations, and abstraction reductions.

1.3 Water Resources Management Plans

We produce a WRMP every five years. It is a statutory document that sets out how a sustainable and secure supply of clean drinking water will be maintained for our customers. Crucially it takes a long-term view over 25 years, allowing us to plan an affordable, sustainable pathway that provides benefit to our customers, society and the environment.

The draft WRMP focussed on the period 2025 to 2050, and is known as draft WRMP24. It was developed following the Water Resources Planning Guideline (WRPG), as well as other relevant guidance, in order to meet statutory requirements. This ensured it:

- Provided a sustainable and secure supply of clean drinking water for our customers.
- Demonstrated a long-term vision for reducing the amount of water taken from the environment, and shows how we will protect and improve it.
- Was affordable.
- Maintained flexibility by being able to respond to new challenges.
- Complied with its legal duties.
- Incorporated national and regional planning.
- Provided best value for the region and its customers.

1.4 Our draft WRMP24

Our draft WRMP24 identified significant challenges for the East of England between 2025 and 2050: some of which were not present for our current plan, WRMP19. These challenges are:

- The implementation of further abstraction **licence capping** across our region.
- Moving beyond our statutory licence cap obligations, further reducing the amount of water we take from sensitive environments. This long-term vision is known as our **environmental destination**.
- Achieving **enhanced resilience to drought**, building on our previous investments to become robust to an extreme 1 in 500 year drought.
- Adapting to **climate change,** and the impacts of the hotter, drier summers and warmer, wetter winters on our water resources.
- An increased demand for water by 2050 with our **region's population growing** by 2050.
- **Significant non-household demand** forecasted, particularly for carbon capture and hydrogen production.

1 Investments that are likely to deliver outcomes efficiently under a wide range of plausible scenarios.

Our modelling showed that these challenges, for our draft WRMP24, resulted in a new water need of 443 megalitres a day by 2050. To meet this need, we established a three tier strategy:

1. Making the best use of existing resources by building on our industry leading demand management and using any surplus water available.
2. The progression of the strategic resource options (SROs): the Fens and Lincolnshire reservoirs, meeting a significant proportion of our new water needs and providing the opportunity for many best value benefits.
3. Planning for adaptive future resources, allowing us to remain flexible to changing circumstances, whilst ensuring bill impacts were limited to our customers by only investing in low regret solutions.

This three tier strategy was central to our draft WRMP24, which was consulted on between the 21st December 2022 and the 29th March 2023.

1.5 The consultation for the draft WRMP24

The consultation for our draft WRMP24 was publicised through:

- The home page banner on our website, directing customers and stakeholders to www.anglianwater.co.uk/wrmp
- LinkedIn posts
- Our Through The Plughole newsletter to customers
- One to one stakeholder sessions
- A dedicated email for our stakeholders

We also held a dedicated webinar for our stakeholders. This gave an overview of the draft WRMP24, its key messages and how to respond to its consultation.

As part of the consultation, through a dedicated consultation document, we asked our stakeholders and customers four questions:

1. Do you support us placing reservoirs at the heart of our draft WRMP24, rather than prioritising other supply-side options such as water reuse and desalination? Please tell us why you think this.
2. We believe we will achieve a best value plan by undertaking a prioritised, three-tiered approach: demand management, two new reservoirs and other options such as water reuse and desalination to solve any remaining deficits. Do you support this approach? Can you explain why you do, or why you don't?
3. We are committed to protecting and improving our environment but don't believe this should be achieved by implementing quick fix solutions, such as desalination, that could end up being detrimental to the environment and more expensive for our customers. Instead, we will develop options such as the Fens and South Lincolnshire reservoirs that may have longer lead times but will provide more environmental benefits in the long term. This means we will have a phased approach to reducing our abstraction in the short term, and will ensure no deterioration to the environment by furthering our already industry leading demand management strategy and implementing short term supply-side options such as transfers. Do you agree with this approach?
4. Do you support us implementing compulsory metering? Is there any other additional support we could provide to our customers when they start to pay according to the amount of water they use?

We also encouraged general feedback to our draft WRMP24.

1.6 Representations received for the consultation

We received 55 responses for the consultation of the draft WRMP24. Fifty one of these representations were from stakeholders, with the remaining coming from our customers.

The largest number of responses were received from Councils in our region, followed by industrial users on the South Humber Bank.

1.7 Common themes from the consultation

Overall, responses to our four consultation questions was positive.

1. The reservoirs were supported, with respondents recognising the positives they could bring to the region, although we were asked to provide further information on the decision making surrounding the reservoir sizing and need.
2. Our three tier strategy was, on the whole, supported but many of our stakeholders stated that we should increase our leakage ambition. A

small number of representations asked that we prioritise water reuse, whilst desalination was, on the whole, disliked due to its high energy consumption.

3. The proposal to conduct scientific investigations as part of the AMP8 WINEP was supported, but a large number of our environmental stakeholders stating we should act sooner to deliver environmental improvement and aim for higher than the BAU+ environmental destination scenario. We were also asked how we would manage the risk of deterioration.
4. The representations tended to agree with the implementation of compulsory metering, with many highlighting that we need to consider vulnerable customers.

Other common themes were apparent in the representation responses. These include, but are not limited to:

- Significant concern for how non-household supplies would be catered for in WRMP24, and net zero supported, considering the growth of hydrogen and carbon capture in our region.
- The disappointment that non-household demand management options were not included in the draft WRMP24, as it was felt that this was a key area of focus.
- The concern that demand management would not deliver its forecasted savings, and how this would be managed and adapted to.
- The need to consider the potential closure of more of our water sources due to the Habitats Regulations.
- Queries about the deliverability of the supply-side options and how this would be monitored and adapted to.
- The request to continue developing our knowledge of processes such as desalination, in case we needed to follow an alternative adaptive pathway.
- We were asked for our expected performance against Government targets.
- Improvements suggested for the Strategic Environment Assessment process, with the need to assess elements of the plan, as well as more focus on the plan as a whole.
- More information on how environmental and social considerations have influenced the development of the WRMP, including key policy decisions, options selection, developing the best value plan and alternatives.
- Clarify how mitigation has been considered in the assessments and the mechanisms through which these maybe secured as individual schemes progress.
- Opportunity to provide more information on cross-boundary issues, including interactions with neighbouring water company plans, SROs and the identification of any cross-boundary conflicts.
- A need to differentiate between the natural and historic environment.
- A need to make the Main report clearer, with better signposting to the technical supporting documents.

1.8 Our Statement of Response and changes for the revised draft WRMP24

The representations from the 55 consultees are shown in this document[2], with our response listed alongside it. Where a change has been made to the revised draft WRMP24 due to the representation, this is highlighted with the relevant document signposted.

A brief summary of the changes made is provided below:

- We have increased our leakage ambition from 24% to 38%
- Projected non-household demand for the South Humber Bank, in North Lincolnshire, has been included to support the Government's net zero requirements. Given the recent increases in non-household demand across our region, we are in discussion with Government and regulators regarding how we can create additional capacity for non-household growth.
- Non-household demand management options have been included, and their importance to our region made more prominent.
- Two existing abstractions have been removed from the supply forecasting, reflecting their possible closure due to Habitats Regulations. The Environment Agency is currently undertaking investigations into the water needs of the Broads SAC, which may result in further reductions in licences in this area. We will keep this under review and may need to bring forward infrastructure proposals.

2 In some cases the response has been amended, due to commercial sensitivities.

- We have brought forward licence capping where possible.
- The current scope for the AMP8 WINEP investigations has been detailed, as well as discussion on how the risk of deterioration will be managed.
- We have elaborated on the measures available for vulnerable customers.
- A focus on our expected performance against Government targets.
- A more strategic, plan focus for the SEA, rather than focusing at a project level.
- More discussion on how the environment has framed our discussion making.
- The Main report has been rewritten to make the needs of the plan, and its solutions, clearer.

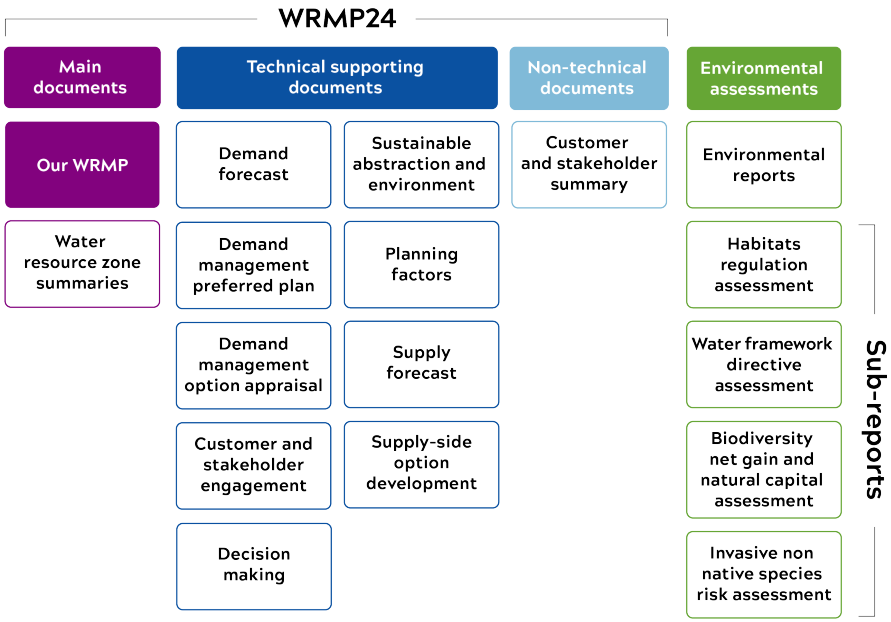
Our core supply side strategy - featuring two new reservoirs, interconnectors and water reuse - remains the same as our draft. We have provided further information demonstrating that this is a low regret plan which will underpin the environmental, economic and social resilience of our region, whilst retaining flexibility to adapt in the longer term.

1.9 Next steps

This Statement of Response is published alongside our revised draft WRMP24 Main report, technical supporting documents and a suite of independent environmental assessments. These are shown in Figure 1. Please contact us at wrmp24@anglianwater.co.uk for any further information.

We would like to take this opportunity to thank all stakeholders for their input into the development of the revised draft WRMP24, and the safeguarding of our region's water supplies and environment.

Figure 1 Our revised draft WRMP24 reports



2. Statement of Response

2.1 Able Humber Ports Ltd

No.	Consultee	Feedback from consultee	Our response	Change made	For further detail of change, please refer to
1	Able Humber Ports Ltd	Able Humber Ports Ltd noted their potential requirement for water for net zero, and the importance of long term industrial water supplies for the Humber region.	We thank Able Humber Ports for their response and have included an assessment of their potential water needs for net zero in our revised draft WRMP24.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.2 Air Products PLC

No.	Consultee	Feedback from consultee	Our response	Change made	For further detail of change, please refer to
1	Air Products PLC	Air Products PLC noted the importance of collaborative working to ensure long term industrial water supplies for the Humber region.	We thank Air Products PLC for their response.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.3 Arqiva

No.	Consultee	Feedback from consultee	Our response	Change made	For further detail of change, please refer to
1	Arqiva	We are at a decisive moment for the water industry and the future security of the UK's water supplies. Without swift action and targeted investment, large swathes of the country are at risk of not having enough water. We welcome Anglian Water's focus on reducing water demand in its draft water resources management plan. Action to reduce demand will improve the resiliency of public water supplies, reduce the amount of energy required to treat drinking water, and help customers realise savings on their household bills.	We agree and thank Arqiva for its response.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document
2	Arqiva	Anglian Water is a leader in smart metering having rolled out smart metering at the fastest rate seen within this industry. We welcome Anglian Water's focus within the draft WRMP on delivering smart metering, and its ambition to 'see full smart meter coverage by 2030'. Anglian Water rightly highlights the benefits smart metering will have to reducing plumbing losses and customer supply pipe leakage, and targeting customer engagement to help reduce per capita consumption.	Our experience with our smart meter trials and in the full smart meter roll-out has given us confidence that this is the best strategy to reduce consumption and leakage losses; as such smart metering is at the heart of our AMP8 demand management programme.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6

2.4 Associated British Ports

No.	Consultee	Feedback from consultee	Our response	Change made	For further detail of change, please refer to
1	Associated British Ports	Associated British Ports noted the importance of collaborative working to ensure long term industrial water supplies for the Humber region.	We thank Associated British Ports for their response.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.5 Babergh District Council and Mid Suffolk District Council

No.	Consultee	Consultee response	Our response	Change made	For further detail of change, please refer to
1	Babergh District Council and Mid Suffolk District Council	We are generally supportive of the draft Water Resources Management Plan (WRMP) and will continue to work closely with Anglian Water as we develop our Development Plan Documents and identify opportunities for development in the future, supported by our Infrastructure Delivery Plan.	We thank the Council for its support, and look forward to continuing our working relationship.	No	N/A
2	Babergh District Council and Mid Suffolk District Council	We support the approach to focus first on reservoirs as the supply-side option to be prioritised due to the benefits that are outlined in the draft WRMP. It is however important to ensure that water efficiency measures are improved to reduce the use of water per person per day, whilst at the same time ensuring the supply of water for households is undertaken in a sustainable manner.	As part of our water resource strategy, we plan to build upon our proven track record of delivering demand management savings and our ambitious AMP7 programme through: leakage reduction, our ambitious strategy for smart metering, and innovative water efficiency options. Our programme of demand management in AMP7, including the roll-out of over one million smart meters, will act as the foundation for our revised draft WRMP24 plan;. This plan will provide economic benefits, deliver substantial water savings, and is also considered to be achievable. Our ambition is to drive the next 'step-change' in demand management through technological innovation, enhanced communications and the implementation of 'industry leading' behavioural change initiatives. Savings from our full roll-out of smart meters by 2030, leakage reduction (to our lowest recorded levels), water efficiency options and non-household options, in combination with government led interventions are expected to more than compensate for regional increases in demand due to population growth throughout the WRMP24 plan period, leading to our lowest recorded levels for both leakage and per capita consumption.	Yes	Demand management preferred plan technical supporting document, Sections 5 to 10
3	Babergh District Council and Mid Suffolk District Council	In respect of non-household use, it is also important to ensure that there is a sustainable supply of water to ensure businesses can develop, whilst at the same time providing support for these businesses to maximise water reuse on their sites.	Non-household consumption accounts for a substantial proportion of overall demand in Anglian Water, representing 27% of our total demand (2022/23). Understanding and forecasting this segment of demand is crucial to the demand forecasting process. Additionally, developing water efficiency strategies for non-household sectors will form a key additional element for any demand reduction strategy, for water companies, retailers and other major sectors that are heavily dependent on water. For the base-year (2021/22) we have assessed non-household demand to be 297Ml/d. We expect the base-line non-household consumption forecast to increase over the planning period in line with population (and employment) growth. Given current uncertainties around business demand and the recent increases we have experienced, we have taken a more risk averse view to future growth and included a higher non-household growth scenario, than the strategic growth scenario chosen for our property and population forecast.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Consultee response	Our response	Change made	For further detail of change, please refer to
			Using this forecast scenario, 'OxCam2b_r_P', means that we have included an additional 33Ml/d of non-household demand over the WRMP24 planning period. Where necessary we have also included site specific volumes for businesses that we know require demand in the near term. Additionally we have consulted with businesses involved with the development of Hydrogen production and carbon capture in the South Humber bank area and included a forecast for this requirement over the next 10 year period. However, we are mindful that the EA/Defra expect non-household demand to reduce by 9% by 2038 and 15% by 2050. These targets are proving to be very challenging to achieve, using our modelling assumptions and growth. We will continue to work with Retailers and Non-household customers as we develop, implement and validate our non-household water efficiency strategy.		

2.6 Braintree District Council

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
1	Braintree District Council	**Response to consultation question one** Reservoirs are supported in principle, subject to the usual planning considerations as visual impact, impact on neighbouring properties, access etc. They are a means of supplying water which can support multiple benefits such as leisure, tourism. sports and provide habitat for biodiversity.	We agree with the Council and thank it for its support.	No	N/A
2	Braintree District Council	**Response to consultation question two** The three-tiered approach is satisfactory. Water recycling and desalination will require more energy on an ongoing basis, and it is not clear that they provide as many benefits as the reservoirs. The Council has supported water demand management in its 2033 Braintree Local Plan through the requirement on developers to adhere to the 110 litres per person per day Building Control standard for new housing. Other measures are supported in principle but, if located within Braintree District, full support would depend on the details of any scheme, including siting.	We thank the Council for its support and will continue to work closely with you.	No	N/A
3	Braintree District Council	**Response to consultation question three** The approach of developing long-lead time options such as the reservoirs whilst conducting a phased approach to abstraction reduction (whilst ensuring no deterioration to the environment) is satisfactory.	We thank the Council for its support.	No	N/A

2.7 British Steel

No.	Consultee	Feedback from consultee	Our response		
1	British Steel	British Steel noted the importance of long term industrial water supplies for the Humber region.	We thank British Steel for their response.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.8 Broadland Agricultural Water Abstractors Group (BAWAG)

No.	Consultee	Consultee response	Our response	Change made	For further detail of change, please refer to
1	BAWAG	**Response to consultation question one** The estimates of long-term environmental need are preliminary and subject to significant uncertainty. Evidence from previous rounds of the WINEP shows that there may be large differences between initial and final assessments of the reductions needed to restore abstraction to sustainable levels, and AW further propose that the AMP8 WINEP investigations is needed to "determine future environmental strategy". Given this, it is unclear why such large, irreversible investments in new reservoir storage are at the heart of the plan, or why the reductions needed for the preferred "environmental destination" are being accelerated from the 2050 deadline in the National Framework for Water Resources. For the purposes of adaptive planning, later programming of these may offer the potential for smaller, better value and more affordable solutions.	We have tested a range of environmental destination scenarios and find that the reservoir options are required in all of them. Greater levels of desalination are required if higher levels of environmental destination are selected following the AMP8 WINEP investigations. Environmental destination is accelerated in line with the availability of water, supporting our commitment to the environment.	No	N/A
2	BAWAG	Neither the demand forecast, or target headroom allowances appear to account for the possibility of significant growth in non-household demand. This may arise from: · Economic development & planned growth in employment. Initiatives such as "Levelling Up" and the "County Deal" may drive this, or · The effect of the Environment Agency's work on restoring sustainable abstraction. This could result in a move from private to public water supply for a proportion of the affected businesses. In the short to medium term, these changes may produce deficits which require the development of new sources of supply. It is unclear if AW is able/would commit to these ahead of the proposed new reservoirs and if it did, whether this would change the selection or timing of the reservoirs.	Whilst developing our demand forecast we have utilised current local authority planning information to derive future projections, based upon population growth, employment and GVA forecasts. These have been applied to sector by sector regression based forecasts developed from data collected over the last 20 years. Understanding that we are currently experiencing significant growth we have uplifted local authority projections by using one of our highest forecasts for non-household growth, based upon our 'OxCam_2b_r_P' growth forecast (note that our core population/property forecast is based upon OxCam1b_r_P). This forecast includes an assessment of growth related to the potential Oxford-Cambridge growth corridor. Using this forecast scenario, 'OxCam2b_r_P', means that we have included an additional 33Ml/d of non-household demand over the WRMP24 planning period. Where necessary we have also included site specific volumes for businesses that we know require demand in the near term. Additionally we have derived an assessment for potential demand due to Hydrogen and carbon capture projects in our region (noting that these will be non-potable demand), based upon industry feedback from relevant partners. We are seeing significant near-term volatility with respect to non-household demand with requests for large volumes by specific sites. This is causing increasing pressure on our ability to deliver these requests within the current government target framework, for reductions in non-household demand, reductions in DI per person and reductions in levels of permitted	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 9 and 13

No.	Consultee	Consultee response	Our response	Change made	For further detail of change, please refer to
			abstraction. We have, consequently, used scenario testing to develop adaptive alternatives to the proposed plan, with defined trigger points in the near term, for adaptive plan development. Significant uncertainty surrounds potential near term non-household growth and we will consequently, continue to liaise with all relevant parties, to facilitate this growth, whilst also progressing our water efficiency strategy. We are also mindful that the EA/Defra expect non-household demand to reduce by 9% by 2038 and 15% by 2050. These targets are proving to be very challenging to achieve, using our modelling assumptions and growth. We will continue to work with Retailers and non-household customers as we develop, implement and validate our non-household water efficiency strategy.		
3	BAWAG	The early part of the final planning solution relies on the deferral of licence capping. This is referred to in the AW Water Resource Planning tables as "Licence cap scenario 4 benefits" and the volumes involved are significant. Since these options appear not to have been assessed as part of the SEA or any related HRA, it is not clear that they will be permitted. Without them, new sources of supply will be needed and the effect of these on the selection and timing of the proposed new reservoirs is unknown.	In response to the consultation feedback that Scenario 4 needs to be assessed, this has been updated in the revised draft WRMP24 Environmental Report; Plan A has been fully assessed which is modelled using Scenario 4.	Yes	Revised draft WRMP24 Environmental Report, Section 7
4	BAWAG	New sources of supply that may be an alternative to licence capping include the following: a. Imports from Severn Trent or Yorkshire Water. Over the period 2025-39, the combined surpluses in the grid systems operated by these companies increase from 43Ml/d to 235Ml/d b. A reduction in levels of service in parts of the AW Ruthamford reservoir system. From the 2015 AW WRMP, changing the frequency of non-essential use bans (NEUB) is projected to release 21Ml/d of new supplies from these, and c. Accelerated delivery of the desalination or water reuse options which are selected/referred to in the latter part of the forecast period It is likely that some of these would need to be used in conjunction with the new AW strategic grid.	a. During option appraisal we didn't identify any options to import water from Severn Trent Water or Yorkshire Water. There are a number of constraining factors that mean that such transfers did not pass initial screening, however, one of the main factors is that we have options in Lincolnshire that we can develop early in our plan. These are options that maximise use of resource already available to us. LNE11, LNE12, LNC30 are all options which can be delivered by 2030 and make use of the capacity in our strategic pipeline to distribute the resource. Transfers that could bring water from Severn Trent or Yorkshire's regions would be long and complex to plan and deliver (major motorway, rail and river crossings) and so would not be delivered any sooner than the options in our Best Value Plan. Not only that but delivering such options for short term needs will result in them becoming stranded assets in future when our other strategic resource options are delivered. b. As part of our drought resilience policy decision making analysis for our revised draft WRMP24 we have modelled the possibility of amending our levels of service (i.e. allowing demand side measures to occur more frequently) to understand if this could enable a greater deployable output in our drought-impacted Water Resource Zones. However, the modelling	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5

No.	Consultee	Consultee response	Our response	Change made	For further detail of change, please refer to
			has shown that without breaching the Emergency Storage levels, there is no increase in deployable output by increasing the frequency of demand restrictions. This is because deployable output is based on a reference drought event, which already has the benefit of demand saving measures included. Any additional benefit from changing levels of service would require a cumulative effect in the years preceding the reference drought, which could theoretically enable an improved starting position. Our analysis has shown no such cumulative effect is present. The reservoirs were able to refill sufficiently in the intervening years between drought events at the current levels of service. c) Due to the complexity involved in delivering reuse and desalination schemes, these are only available from 2032 onwards. The revised draft WRMP24 Decision Making technical supporting document describes the testing of Scenario 7 licence caps, which are scheduled from 2032. Scenario 7 modelling selected desalination and reuse options earlier, but this has the downsides of increased operational costs, delaying the timing of the SRO reservoirs (which could make the plan less adaptable to future scenarios where they are required earlier), and generating surplus resource. To use the surplus resource would require earlier commitment to the Environmental Destination abstraction reductions (before the outcome of the WINEP studies in AMP8), which again would make this scenario less adaptable. On this basis, Scenario 4 was selected for the initial most likely planning scenario.		
5	BAWAG	Since the largest driver for the new reservoirs is a combination of future environmental need and drought, there is an opportunity for AW to develop a strategy based on an integrated approach to land and water management, or some other form of nature-based solution. Extending the scope and ambition of the WINEP in this way may produce a more balanced plan, which doesn't rely so heavily on built infrastructure. It may also provide a low carbon, high biodiversity net gain (BNG) means of mitigating risk in the demand management programme, including from greater than expected population growth or a failure to achieve leakage and consumption targets.	The Fens Reservoir is driven by the capping of abstraction licences rather than the reduction in abstraction due to environmental destination. The Lincolnshire Reservoir is driven by environmental destination but is selected in all the environmental destination scenarios and therefore the WINEP AMP8 Environmental Destination investigations will not alter its selection. Nonetheless, we agree that nature-based solutions may offer benefits and will explore these as part of the WINEP investigations.	No	N/A
6	BAWAG	The effect of removing the licence capping options and replacing these with one or more of the options listed in BAWAG representation 1, the "supply options least cost plan" indicates that this is likely to result in one or other of the reservoirs not being selected, or the timing of the need being significantly altered.	For the revised draft WRMP24, the SRO options have been unconstrained within our modelling, but have still been selected in our least cost plans. Through our ongoing liaison with the Environment Agency in the draft WRMP24 document we originally agreed to use the 'Regional plan low regret options plan' as our benchmark. However we have found through the least cost modelling that strategic no and low-regret options were selected in the same years for all least cost plans. Therefore we have used	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6

No.	Consultee	Consultee response	Our response	Change made	For further detail of change, please refer to
			the Supply options least cost plan as our benchmark as this reflects the regional plan but does not constrain the scale or timing of the strategic options. This confirms that the least cost plan with the regional plan options unconstrained is suitable as the initial least cost plan.		
7	BAWAG	BAWAG highlights the reliance of the best-value plan on outputs from the regional planning process, and the deficiencies noted in respect of this. The Environment Agency consultation response on the WRE regional plan is challenging and reduces confidence in corresponding arguments in the AW plan, including those used to justify the selection and timing of the reservoirs.	For the revised draft WRMP24, the SROs and other options have been unconstrained within our modelling. Through our ongoing liaison with the Environment Agency, for draft WRMP24 we originally agreed to use the 'Regional plan low regret options plan' as our benchmark. However we have found through the least cost modelling that strategic no and low-regret options were selected in the same years for all least cost plans. Therefore we have used the 'Supply options least cost plan' as our benchmark as this reflects the regional plan but does not constrain the scale or timing of the strategic options. This confirms that the least cost plan with the regional plan options unconstrained is suitable as the initial least cost plan.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6
8	BAWAG	There is a lack of any detailed account of the work of the Regional Reconciliation Group (RCG) or of any other national scale modelling. This prevents any assessment of the value of imports/exports in maintaining the supply-demand balance in the AW system, or in enhancing the associated levels of drought resilience.	For the revised draft WRMP we have modelled a series of potential transfers from the other regional groups. At present these transfers are theoretical, as there are no immediate opportunities for importing water from other companies. This work is a repeat of the Regional Reconciliation No.3 process, which seeks to ensure alignment between the five regional planning groups, in particular around the timing and selection of transfer options. This modelling provides an understanding at water company level and shows how our plan could adapt if one of the regional groups, in subsequent planning rounds, developed an option which could be shared between regions. The modelling shows that our plan could adapt if imports from other regions where available in the future. The imports would have the effect of offsetting the capacity of desalination needed if these transfers were deemed better value to developing the desalination. They would not impact the capacity of the reservoirs.	Yes	Revised draft WRMP24 Decision Making technical supporting document, Section 7
9	BAWAG	**Response to consultation question two** BAWAG supports the twin-track (demand management & supply-side) strategy promoted by AW, subject to the following: -The lack of new supply-side options in the short to medium term could threaten abstractors who need to switch from private to public water supplies, or water-dependent businesses that seek to locate in the region.	We have a limited number of feasible options available prior to 2032, as set out in both the draft and revised draft WRMP24 Supply-side option development technical supporting documents. By 2032, Desalination and water reuse options become available due to their longer lead times driven by their complexity. Our revised draft WRMP24 best value plan now includes all the new supply options that are available to us before 2032, and until 2032, our plan relies on these options, alongside demand management to maintain our supply demand balance and achieve the objective of no-deterioration. After 2032, these schemes are supported by Colchester water reuse option.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5

No.	Consultee	Consultee response	Our response	Change made	For further detail of change, please refer to
		-The availability of new supplies for non-household customers is already an issue in the Essex and Suffolk Water supply system and is emerging as a significant concern in adjacent parts of the Anglian Water system.	The revised draft WRMP24 Decision Making technical supporting document describes the testing of Scenario 7 licence caps, which are scheduled from 2032. In this scenario, additional desalination and reuse options were selected in 2032, but this has the downsides of increased operational costs, delaying the timing of the SRO reservoirs (which could make the plan less adaptable to future scenarios where they are required earlier), and generating surplus resource. To use the surplus resource would require earlier commitment to the Environmental Destination abstraction reductions (before the outcome of the WINEP scientific investigations in AMP8), which again would make this scenario less adaptable. On this basis, Scenario 4, which delivers time limited licence caps to recent actual in 2030, and all permanent licence caps later in 2036 was selected for the initial most likely planning scenario.		
10	BAWAG	AW need to commit more effort to catchment-based planning, and the use of this as an alternative to built-infrastructure. This includes nature-based solutions and a more integrated approach to land and water management. Overall AW should be seeking to enhance the resilience of both the natural and engineered water resource/water supply systems on which they rely, seeking to produce tangible benefits that can be accounted for in future water resource management plans.	We are considering how nature based solutions and integrated approaches will help achieve environmental destination and will explore this as part of the AMP8 WINEP investigations. The recently updated draft Environmental Destination guidance has put emphasis on nature based solutions too.	Yes	N/A- will be considered as part of the AMP8 WINEP investigations.
11	BAWAG	**Response to consultation question three** BAWAG are concerned that deferral of licence capping is needed to maintain the supply-demand balance in the short to medium term. There is no clear, simple description of this, or of the proposal to use Regulation 19 of the Water Environment Regulations (2017) to enable it. The resulting lack of transparency undermines confidence in the plan & process for producing it. As well as resulting in an unacceptable level of deterioration risk: 1. The case for a Regulation 19 approach is not adequately demonstrated. This includes a failure to appraise options for importing water from the Severn Trent and Yorkshire Water strategic grids , and 2. The Regulation 19 approach and related options do not appear to have been tested using the SEA or any related HRAs. This process would seek alternatives and where these are not available, specify appropriate mitigation measures.	Our revised draft WRMP24 Decision Making technical supporting document describes how we have developed our licence capping strategy, working closely with our regulators, including our proposed Regulation 19 approach. The report also describes the additional process step taken to develop our preferred most likely scenario, which delivers licence caps as early as possible in priority WRZs. A strategic environmental assessment of the timing of licence capping has been conducted for revised draft WRMP24, and the licence capping scenarios have been included within the assessment of the four alternative plans . In addition, the WFD Sub-report has highlighted the potential risks related to the deferral of licence capping. During supply-side option appraisal we didn't identify any options to import water from Severn Trent Water or Yorkshire Water. There are a number of constraining factors that mean that such transfers did not pass initial screening, however, one of the main factors is that we have options in Lincolnshire that we can develop early in our plan. These are options that	Yes	Revised draft WRMP24 Decision making technical supporting document, Sections 4 and 6 Revised draft WRMP24 Environment Report, Chapters 5, 6 and 7 Revised draft WRMP24 WFD Sub-report

No.	Consultee	Consultee response	Our response	Change made	For further detail of change, please refer to
		Licence capping is not only an issue for the environment. Other abstractors in catchments where this happens may find that options for making equivalent changes are constrained by on-going abstraction for public water supply. Where this is the case, it's likely that the related costs and disruption will increase.	maximise use of resource already available to us. LNE11, LNE12, LNC30 are all options which can be delivered by 2030 and make use of the capacity in our strategic pipeline to distribute the resource. Transfers that could being water from Severn Trent or Yorkshire's regions would be long and complex to plan and deliver (major motorway, rail and river crossings) and so would not be delivered any sooner than the options in our Best Value Plan. Not only that, but delivering such options for short term needs will result in them becoming stranded assets in future when our other strategic resource options are delivered.		
12	BAWAG	**Response to consultation question four** BAWAG fully supports payment for water on the basis of a measured supply.	We thank BAWAG for its support.	No	N/A
13	BAWAG	**Summary** BAWAG has concerns about the AW draft WRMP24, and the potential for this to impact on members businesses, as well as the ability of members to achieve the following goals: · Secure access to reliable, affordable and sustainable water supplies · Enhance resilience in the related agri-environmental systems, and · Deliver enhanced societal and environmental outcomes. The principal issue is the proposal to defer licence capping in catchments where AW and BAWAG members share resources. On-going abstraction for public water supply will not only constrain options for meeting our members own statutory obligations, but also result in an unacceptable risk of deterioration in water body status. This is contrary to most of what BAWAG and its members are trying to achieve. To be satisfied that the deferral of licence capping is essential, BAWAG would like to see more work and clear evidence that there are no technically feasible or reasonable-cost alternatives. If this proves to be the case, mitigation measures will then be needed, both for the environment and the local economy. In catchments where AW and BAWAG are represented, work on capping and mitigation should be aligned and where beneficial, this should include collaboration and the joint exploration of needs and solutions.	We understand BAWAG's concerns and share their interest in avoiding the risk of deterioration. BAWAG will also appreciate that we have a statutory duty to supply water for domestic purposes and that the change in the Environment Agency's approach to capping abstraction licences requires time to adjust to. We have included a new appendix relating to licence capping and the need for a temporary extension in order to maintain public water supplies (including to BAWAG members). We look forward to working with BAWAG to explore needs and solutions in Norfolk catchments.	No	N/A

2.9 Buckinghamshire Council

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
1	Buckinghamshire Council	Buckinghamshire Council is preparing a new Local Plan for Buckinghamshire for the period up to 2040. This is the first Local Plan for this geography, with previous Local Plans for the area covering the former districts of Aylesbury Vale, Chiltern, South Bucks and Wycombe. Both the legacy areas of Aylesbury Vale and Wycombe have recently adopted Local Plans supported by Infrastructure Delivery Plans (VALP IDP, VALP IDP Appendix A and Wycombe IDP). These documents identified the key infrastructure required to support development within the Aylesbury Vale and Wycombe in the period up to 2033, and how it will be delivered. The previous IDPs were based on an expectation that some 30,134 dwellings were going to be delivered in Aylesbury Vale (28,600 required plus a buffer) and 10,925 dwellings to be delivered in Wycombe during the period 2013-2033. These figures should be considered for infrastructure planning.	Underpinning the forecast for future water demand must be a detailed understanding of demographic change, new developments, household formation, population and occupancy changes in the Anglian Water region. Robust housing and demographic forecasts are a key consideration in the planning guidelines established for WRMP24. In order to facilitate the collation of Local Authority Planning information, we have utilized a specialised demographic analysis company. This company collated and produced household build trajectories for all the 69 Local Authorities in the Anglian Water Region. We have also sought to align core scenarios with our key neighbouring regional groups, including Water Resources South East (WRSE). These 'Plan' based projections (and supporting data) have been used to inform near term projections of both housing and population growth. The demographic analysis company also developed a set of regional scenarios that reflect the potential strategic growth corridor (Oxford through to Cambridge). These strategic scenarios are founded upon the Local Authority Plans, whilst using reasonable extrapolation to model additional growth. For the revised draft WRMP24 we have chosen a growth projection which reflects a limited level of strategic growth (as reflected in the 'OxCam-1b_r_P' variant). This scenario projects housing and population growth at a similar level to the housing plan projections for AMP8 (2025 to 2030), but maintains a higher level of growth in impacted areas from 2030 onwards. This growth scenario would appear to be a more risk averse selection for the revised draft WRMP24 and is in line with recent population growth seen in the region. For our Ruthamford West and Ruthamford Central water resource zones we are forecasting >80K new properties.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Sections 2, 5 and 6
2	Buckinghamshire Council	The Local Plan for Buckinghamshire will replace existing local plans once adopted and will plan up to 2040 for additional growth. We want to keep having a dialogue with you in terms of understanding your population forecasts and growth assumptions, including sensitivity testing national changes such as those announced in the Planning White Paper and through the Levelling Up and Regeneration Bill. As the Local Plan for Buckinghamshire progresses, we will be keen to ensure that you factor in the latest growth figures in your plans.	We are keen to maintain all links with key stakeholders, especially in areas of high growth, as we implement our WRMP24 programme and develop our future WRMP plans (WRMP29). We have included our high OxCam_1b_r_P assessment of growth as our preferred trajectory, which reflects an assessment of strategic growth in the Oxford Cambridge corridor, but are keen to update this, as plans are revised, so that we can keep our assessments of demand requirements as up-to-date as possible for future and adaptive planning requirements. We will look forward to further discussions regarding growth over time and will be happy to extract and show growth figures relating to your specific area.	No	Revised draft WRMP24 Demand forecast technical supporting document, Section 5

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
3	Buckinghamshire Council	If there are strategic options being considered in Buckinghamshire, or neighbouring authorities areas, or that could involve cross border issues in the future e.g. strategic options for a reservoir or regional water transfers, or upgrades to neighbouring WwTWs - e.g. in Milton Keynes - we request early engagement to ensure this is included in our local plan at an early stage. As we embark on our Water Cycle Study and SFRA level 1 for the Local Plan, we also want to ensure that flood risk implications of the proposals for the catchments involved have been fully assessed. We will continue to engage with you in parallel on the WCS and SFRA level.	Where we have strategic options, we will engage with Councils and local stakeholders as soon as possible. We believe this early, open engagement drives the right outcomes for a project. We welcome continued engagement with Buckinghamshire Council on the WCS and SFRA.	No	N/A
4	Buckinghamshire Council	We continue to support ambitious leakage reductions, both from a supply and flood risk management perspective. We know that leakages contribute to increased run offs in urban areas. We do understand that this will need to be balanced with more strategic investments to replace the network. Having reviewed the regional policies proposals, and your company's proposals, and while we note your ambition of halving leakage figures by 2050, it is our view that your Per Capita Consumption policy needs to be more ambitious in the early part of the plan period, and specific, aligned with, as a minimum, the targets set in the Building Regulations (125 l/p/d; or 110 in an area of water stress). Note that both the Wycombe District Local Plan and the Vale of Aylesbury Local Plan have an adopted target of 110 litres per person per day which applies to all new development now. As we prepare future plans for Buckinghamshire under the new unitary authority, we will look to your evidence to continue to support ambitious targets.	We plan to build upon our proven track record of delivering demand management savings, through our leakage reduction strategy, ambitious smart metering program and innovative water efficiency initiatives. Our ambition is to drive the next 'step-change' in demand management through: technological innovation, enhanced communication strategies, improved understanding of our customers behaviour, and the implementation of 'industry leading' water efficiency initiatives. 90% of our customers currently have a meter and 84% are billed on measured charges. We expect 1.1 million of our customers to have a smart meter by 2025, with our full customer base being smart metered by 2030. This will facilitate a 'step change' in our ability to communicate with our customers. Our revised draft WRMP24 water efficiency strategy, includes: the full roll-out of smart metering across the Anglian Water region (by 2030); our most ambitious program of water efficiency options and tailored customer communications, designed to influence customer behaviours and attitudes, and the impact of government led interventions (these will also be integral to achieving our PCC target). We forecast that this strategy will help us to achieve a PCC of less than 110l/h/d by 2050, but we will need all relevant stakeholders to play their part in this process. As part of our WRMP24 programme we are planning to closely monitor our demand management strategy and understand customer consumption, including that in new developments, to further reduce PCC over time.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 7
5	Buckinghamshire Council	We welcome the reduction of abstraction from groundwater supply as this protects the Chalk Aquifer. Where you may be considering groundwater schemes in the form of Managed Aquifer Recharge (MAR) or Aquifer Storage and Recovery (ASR), this should not be to the detriment of increasing flood risk from groundwater, now or in the future taking account of climate change; they should include opportunities for flood management betterment. All changes to groundwater abstraction should be modelled	We agree.	No	N/A

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
		to understand changes in terms of flood risk impacts which can affect communities and the environment, now and in the future taking account of climate change, and these should be mitigated.			
6	Buckinghamshire Council	As you work towards embedding catchment/nature based solutions in your future plans, we are keen to see an intent to align with statutory Local Nature Recovery Strategies reflected in your plans now. You may be aware that Buckinghamshire Council produced a pilot in 2021/2022: Local Nature Recovery Strategy Pilot - Buckinghamshire & Milton Keynes Natural Environment Partnership (bucksmknep.co.uk). We will be developing a new LNRS in the next few months, following publication of national guidance in April, and are keen to engage with the water companies on this to ensure synergies in terms of priorities and schemes going forward.	Throughout our WINEP environmental destination investigations we will be engaging to ensure alignment with Local Nature Recovery Strategies. We look forward to discussing with you the potential synergies between the projects.	No	N/A
7	Buckinghamshire Council	We are keen to ensure that we are engaged at the appropriate times and through appropriate channels. To that effect, we ask that all consultations are notified to us by way of email, to planningpolicyteam.bc@buckinghamshire.gov.uk Please amend your consultation database accordingly.	Thanks for informing us of this. We have included the email address given into our consultation database.	Yes	N/A

2.10 Cambridge City Council and South Cambridgeshire District Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Cambridge City Council and South Cambridgeshire District Council	The Councils have recognised that we face a climate and ecological emergency, and the state of the water environment is a significant concern for the Councils. Although water in Greater Cambridge is supplied by Cambridge Water, the area is adjacent to the Anglian Water supply area and is inextricably linked, as is shown by the draft WRMPs of both water companies. The Councils request that Anglian Water continues to work cooperatively with Cambridge Water, given the constrained nature of the Cambridge Water supply area. Anglian Water's final WRMP will need to take into account issues arising from the consultation on Cambridge Water's draft WRMP and their resulting final WRMP and vice versa.	We note the Council's declaration and will continue working closely with Cambridge Water as we finalise our WRMPs.	No	N/A
2	Cambridge City Council and South Cambridgeshire District Council	**Transfer to Cambridge Water** The Councils support in principle the proposed transfer of water from Anglian Water's reservoir, Grafham Water, to Cambridge Water, which is essential to provide additional supply ahead of the Fens Reservoir being operational and which will support the abstraction reductions required by the Environment Agency to protect the chalk streams. The publication of Cambridge Water's draft WRMP in February 2023, reiterates this proposed transfer which will help to support Cambridge Water during the short term when licence caps lead to a significant water resource challenge. The draft Cambridge Water WRMP states that following discussion with Anglian Water, both companies have proposed the acceleration of the work, as part of the Defra Accelerated Scheme. If approved this would enable the water transfer to be available in about 2027, rather than 2031. The Councils support the acceleration of this programme, and request that this is included within Anglian Water's final WRMP.	This transfer was not approved for AID funding, although both companies have committed to prioritising it through transition funding. Modelling for the revised draft WRMP has shown that we cannot provide this water to Cambridge Water without relying on a drought permit. Therefore we have worked with Affinity Water and Cambridge Water to develop an alternative solution whereby Affinity Water will reduce their take from Grafham Water, and the equivalent volume will then be supplied to Cambridge Water. It is anticipated that this arrangement will be place in 2032, and continue until the Fens Reservoir is commissioned in 2036.	Yes	Revised draft WRMP24 Decision Making technical supporting document, Section 11
3	Cambridge City Council and South Cambridgeshire District Council	**Fens Reservoir** The Councils also support in principle the proposal for the Fens Reservoir which is being developed in partnership by Anglian Water and Cambridge Water through the RAPID process and which will provide additional strategic-scale water supply, with half of the water to supply Anglian Water and half to Cambridge Water. This infrastructure is essential to reduce reliance on the abstraction of water from the chalk aquifer in Greater Cambridge, which is having a detrimental environmental impact, and to provide additional water to support future housing and economic development. The draft WRMP states that 'the Fens Reservoir will not come online until 2035' and recognises that this date is highly ambitious. The Cambridge Water draft WRMP states that the reservoir 'could be in supply	We thank the Councils for their support. We continue to prioritise the Fens Reservoir through the RAPID programme, and have confirmed a 2036 delivery date in our revised draft WRMP.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		between 2035 and 2037'. Whilst noting the need for robust regulatory and consenting processes, the Councils support the prioritisation of this essential new infrastructure so that the environmental benefits from reduced abstraction can be realised as soon as possible.			
4	Cambridge City Council and South Cambridgeshire District Council	**Demand Management** The Councils are supportive of the demand side measures set out in the WRMP for both household and non-household uses. Demand side measures provide opportunities to make better use of the water available through using water more efficiently, minimising waste by leakage control and smart metering and re-using water. The effectiveness of these measures will need to be continually monitored. The Councils will include policies in the new Greater Cambridge Local Plan to ensure that new developments are extremely water efficient and this could be encourage in other local authority areas that fall within the Anglian Water area.	We thank the Councils for their support. We are continually monitoring the effectiveness of demand management through our Demand Management Monitoring Framework. We are working with all 69 local authorities in our region regarding water efficiency in new developments.	Yes	Revised draft WRMP24 Demand management preferred plan, Section 13
5	Cambridge City Council and South Cambridgeshire District Council	The Councils would urge Anglian Water to lobby Government to recognise the role that they need to play in tightening Building Regulations standards for water efficiency.	As part of the WRMP24 demand forecast we have been keen to liaise with our Local Authority partners in order to reflect planned growth. We have also included an assessment for government led interventions (in accordance with WUK/Artesia evidence) in our preferred plan, showing how we might expect policy to impact PCC and help us in achieving the PCC target. Additionally, we are mindful of the role that building regulation can play in facilitating water efficiency. We will continue to liaise with our NAV partners (noting their increasing incidence) and local authorities to reinforce the need for stricter controls on new (and retrofit) development. We, consequently, believe that all stakeholders, including government bodies must assist in driving water efficiency forward and setting the framework in which we, as a water company, operate.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 5
6	Cambridge City Council and South Cambridgeshire District Council	The Councils are also supportive of the proposed Government changes to the labelling of white goods and household appliances, to show their water efficiency, which is referred to in the WRMP. This should also include the requirement of water usage controls on electric power and rain showers. Again, the Councils would urge Anglian Water to lobby the Government to introduce this as soon as possible.	As part of our assessment of future consumption for our preferred pan, we have included an assessment of the impacts of government led interventions, based upon the Artesia/WUK report (Water UK Pathways to long-term PCC reduction Project reference: 2346 Report number: AR1286 2019-08-15). We are, therefore keen to support all key stakeholders in driving forward water efficiency policies, that will help us to achieve the stated EA/Defra target of 110l/h/d by 2050.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 12
7	Cambridge City Council and South Cambridgeshire District Council	**Water Reuse** Anglian Water are proposing a new Cambridge Water Treatment Plan, and the reuse of water from this is included within the Cambridge Water draft WRMP. The scheme to be submitted by Anglian Water under the DCO process will need to take this into account.	We are aware of Cambridge Water's interest in reuse, although we understand this will not be selected in their revised draft WRMP. However, we will continue to liaise with Cambridge Water and include it as part of the DCO application as necessary.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
8	Cambridge City Council and South Cambridgeshire District Council	As part of integrated water management in both new residential and non-residential developments, rainwater harvesting and greywater recycling should also be encouraged to make new developments as water efficient as possible. In larger developments, the benefits of site-wide rainwater harvesting and greywater recycling should be considered. These measures are not currently referred to in the WRMP. These should be included as they are an opportunity to provide additional water reuse, and Anglian Water will need to work with local planning authorities and developers.	Our strategic growth team are actively working in partnership with developers to investigate and trial rainwater re-use, along with the potential for grey-green-black water re-use. This aligns with our current work on the concepts of 'water neutrality' and 'smart communities', which we are also investigating in partnership with local authorities and developers. As we implement our WRMP24 demand management programme we intend to promote these areas further with our 'Demand Reduction Discovery Fund' and will be keen to collaborate in how these ideas and options might be rolled out more generally.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 7, 9 and 10 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 2
9	Cambridge City Council and South Cambridgeshire District Council	**Desalination** The Councils agree that reservoirs and water reuse should be favoured over the desalination options. WRE's draft Regional Plan shows that in the future following the development of the two strategic reservoirs, the region will need to rely upon desalination for additional water supply to fulfil long-term environmental improvements. The Councils would only be supportive of this if it was 'next-generation' desalination as set out in the draft Regional Plan which refers to the net zero carbon technologies that will need to be incorporated into the lifetime of the plants and an environmentally safe means of disposing of the brine water residue. There will be a need to monitor the progress of the development of such new technologies if they are to be relied upon in future plans.	All of our WRMP supply side options undergo carbon emissions impact assessments and rigorous environmental assessment. At this moment in time, the widely accepted and understood industry standard means of desalination is Reverse Osmosis. While there are developments in the field, in reality this technology is nearing its optimal performance ability and there are not going to be large improvements made in energy efficiency; for example, new 'batch technologies' are looking to improve energy efficiency by around 5%. There may be new technologies in the future, and when they arise we want to be at the forefront, but in the meantime we have to look at best use of the technology available to us now. We shall be working with academic institutions to look at brine management strategies, to reduce the volume, concentration and impact of brine discharges. We will seek opportunities for mineral recovery, alternative uses and salt wetland habitat creation. We are also working with expert consultants and water companies from around the world that are successfully building and operating desalination to learn best practice so we can implement the technology the right way, from day one. By looking to collaborate with other sectors such as hydrogen production and offshore wind, we feel confident we can manage the long term carbon impacts of this technology.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document, Sections 4 and 7, and Annex A

2.11 Cambridgeshire County Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Cambridgeshire County Council	**Response to consultation question one** It is recognised that the creation of reservoirs can have multiple benefits if taken into consideration early enough the design process. Particularly in an area such as Cambridgeshire where there is a significant risk of flooding from rivers, streams and surface water, a reservoir has the potential to provide the purpose of both water supply and flood risk management. In line with Cambridgeshire's vision to secure renewable and resilient energy supplies, and become net zero by 2045, we support the ambition to incorporate renewable energy opportunities such as solar at any new reservoir. It is essential that any proposed reservoirs are suitably located to take account of the impacts of climate change.	As part of the project, there is a strategy on carbon that will set out our approach to renewable energy and also how we will achieve net zero. Flood risk was assessed as part of the site selection process and will continue to be evaluated.	No	N/A
2	Cambridgeshire County Council	We recognise the carbon impacts of desalination and the availability of more sustainable options to explore in the future. Whilst the use of desalination wouldn't have a direct impact on Cambridgeshire due to our inland location, we support opting to push this to the latter part of the planning period to explore new technologies. In particular, desalination is very energy dependent, and our power supply is also a strategic challenge. Similarly, the environmental impacts of desalination cannot be ignored, for example the disposal of the resulting brine can have harmful environmental consequences if not carried out appropriately. It is however important to consider that desalination and water reuse are not dependent on rainfall and should therefore remain any element of a sustainable water supply strategy.	All of our WRMP supply-side options undergo carbon emissions impact assessments and rigorous environmental assessment. At this moment in time, the widely accepted and understood industry standard means of desalination is Reverse Osmosis. While there are developments in the field, in reality this technology is nearing its optimal performance ability and there are not going to be large improvements made in energy efficiency - for example, new 'batch technologies' are looking to improve energy efficiency by around 5%. There may be new technologies in the future, and when they arise we want to be at the forefront, but in the meantime we have to look at best use of the technology available to us now. We shall be working with academic institutions to look at brine management strategies, to reduce the volume, concentration and impact of brine discharges. We will seek opportunities for mineral recovery, alternative uses and salt wetland habitat creation. We are also working with expert consultants and water companies from around the world that are successfully building and operating desalination to learn best practice so we can implement the technology the right way, from day one. By looking to collaborate with other sectors such as hydrogen production and offshore wind, we feel confident we can manage the long term carbon impacts of this technology.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document, Sections 4 and 7, and Annex A
3	Cambridgeshire County Council	We believe water reuse should remain a key priority however, as it maintains consistency with the principles of the circular economy. We recognise there is a public perception challenge around water reuse, but this is a long-term plan and education of the public as to the importance and value of water (especially around use and leakage management) should also include reuse.	We thank the Council for their support of water reuse, and will consider its comments as part of the development of this technology.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		It is however important to consider that desalination and water reuse are not dependent on rainfall and should therefore remain any element of a sustainable water supply strategy.			
4	Cambridgeshire County Council	**Response to consultation question two** We agree that it is important to have a three-tiered approach and support the approach of working with householders and business to reduce how much water they use. A strategic priority for Cambridgeshire County Council is to be net zero by 2045 and this includes working with partners to deliver approaches that will conserve water and help manage our water scarcity. Furthermore, we want to work with partner organisations to deliver a holistic water management approach that balances the complex interactions of water abstraction, irrigation and navigation with biodiversity engagement.	Thanks for your support for our three tier strategy. We look forward to our continued engagement with Cambridgeshire County Council.	No	N/A
5	Cambridgeshire County Council	We are unsure whether you have placed sufficient emphasis on agriculture and irrigation. The WRMP24 talks about the need to reduce abstraction, but in the face of predicted changing patterns in rainfall, it is likely that farmers and others will be less likely to reduce abstraction so what policies are in place for this eventuality? The WRMP points to the WRE regional plan as a regional approach is needed; we would agree but WRE is not a delivery body, and Anglian Water will need to engage closely to support agriculture and industry. Furthermore, it is important that Anglian Water considers the additional consents (such as planning permission) that may be required as a result of the incidental extraction of minerals that will occur through the construction of reservoirs.	We are working closely with WRE, fellow abstractors and regulators to determine what future impacts there may be for abstractions. We will also work closely with the relevant authorities to determine what additional consents are required for our development activities.	No	N/A
6	Cambridgeshire County Council	**Response to consultation question three** We would welcome taking a considered and informed approach to decision making rather than making quick solution decisions. However, it is important to recognise that the region is already under significant water stress for householders, businesses and agriculture. This in turn puts excessive pressure on rivers and aquifers. Any new reservoir will not be supplying clean water until the mid-late 2030s and we seek reassurances that Anglian Water has considered how to meet the projected and potential crisis levels of demand between now and then. Water supply infrastructure needs investment now in order to meet demand, particularly in high growth areas like Cambridgeshire. It is important to roll out an education programme on consumer behaviour now which will go some way to reducing demand and try to help alleviate immediate pressures.	As part of the Water Resources East regional group we have been working with other water companies and key stakeholders in the development of our plan. We recognise the serious challenges we face in the near term and, consequently, have included our most ambitious plan for demand management to try to mitigate these issues (whilst understanding the uncertainties associated with behavioural change and demand reduction). We are keen to work with all parties on developing innovative solutions and promoting water efficiency, as a key part of overall development in the region. We wholeheartedly agree that education and attitudinal change will be key to generating future 'behavioural norms'. As discussed in the plan we consider the introduction of smart meters and the communications strategies that they will enable (linked to real time consumption data) as a key part of our demand management strategy.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
7	Cambridgeshire County Council	**Response to consultation question four** Cambridgeshire County Council would wish to see further evidence of the need for compulsory metering and a full Equality Impact Assessment to demonstrate that an adverse impact on any group can be reduced and managed appropriately. Furthermore we seek a public commitment by Anglian Water to minimise bill impacts. Your report states that 9% of your customers are on unmeasured charges: do you know which social or economic demographic this 9% belongs to?	As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering program. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options which assist vulnerable customers and we will review these in the context of compulsory metering. We are currently developing our programme in close collaboration with our customer engagement groups.	No	Demand management preferred plan technical supporting document, section 7
8	Cambridgeshire County Council	We would also wish to see further evidence of measures that Anglian Water will take around leakage reduction. Whilst the WRMP24 suggests that Anglian Water are one of the 'frontier companies' for leakage reduction and therefore the 50% should not apply, leakage reduction is an essential component of providing a sustainable clean water supply. Further commitment to leakage reduction should therefore be made. Any compulsory metering should be preceded by educating consumers if it is expected that they will reduce their consumption by almost a third.	As part of our revised draft WRMP24, and in the light of our consultation, have reviewed our leakage reduction program. We have, consequently, included our maximum feasible leakage reduction program, achieving a reduction of 38% (from the 2017/18 base-line) by 2050. This reduction is now more in alignment with the anticipated reductions from other water companies. Additionally it should be noted that if the 50% reduction for leakage is applied as a set of national attainment curves, Anglian Water will be below these targets by 2030 and very significantly below, by 2050. We are currently a frontier company for leakage, recording our lowest level of leakage in 2021/22. This means that more cost effective leakage reduction strategies have already been exhausted. We will, therefore, need to engage in significant mains replacement over the WRMP24 planning period (at a significant cost). This additional cost has been profiled to occur at later stages in the WRMP24 planning period, giving ample time to investigate technologies to mitigate and reduce the cost (due to mains replacement).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 4

2.12 Canal & River Trust

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Canal & River Trust	The Trust have been working closely with all the Regional Groups to ensure that the future needs and aspirations of our navigational responsibilities are recognised accordingly. Whilst our direct engagement with Anglian Water may have been limited, we have continued to work with Water Resources East (WRE) to ensure supply options via the Trust's infrastructure are consideredappropriately. The Trust have welcomed the promotion of the Grand Union Canal Strategic Resource Option (GUC SRO), proposed to transfer water from the Water Resources West region, via WRE to the Water Resources South East region. The GUC SRO has been a collaboration of Affinity Water, Severn Trent Water and the Trust. Regional planning and the relevant draft Water Resource Management Plans have this scheme as a preferred option for phase 1 delivery of 50Ml/d (DO) water by 2030-31, with phase 2 of a further 50Ml/d (DO) by 2040. Infrastructure improvements are proposed to support an overall transfer capacity of 115Ml/d although it's recognised that predicted utilisation may mean that there is water available for the WRE region. The Trust will continue to engage with Bedford and Milton Keynes Waterway Partnership concerning this potential opportunity and would recommend that Anglian Water consider this in their future options appraisal.	We welcome your thoughts on this. Through the regional partnerships we are close to the GUC SRO and liaise regularly with the other parties involved. As the project develops we will all gain a clearer understanding of utilisation and resource availability.	No	N/A
2	Canal & River Trust	Anglian Water will be aware that in December 2022 the Trust made representations to their published document 'A proposed reservoir in Lincolnshire, Phase one consultation brochure'. The Trust are the navigation authority for navigable parts of the River Trent as it passes through Newark, the Brayford Pool on the Fossdyke Canal and for the River Witham between Brayford Pool and the Grand Sluice, Boston. Given the Trust's numerous and varied interests, including land ownership, we have recommended that we are involved in any future feasibility or scoping works.	Thank you for your interest. We are pleased to confirm that the Canal and Rivers Trust are part of the technical working groups for the SROs.	No	N/A
3	Canal & River Trust	We look forward to continuing working with Anglian Water to help inform and develop their plan accordingly.	We look forward to our continued engagement.	No	N/A

2.13 CCW

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	CCW	**Summary of our key issues/concerns** We are of the view that the WRMP should include more information on the following elements of the plan: How customers' views have shaped Anglian Water's approach to reducing leakage. Clarity about why it expects future Government policies on water efficiency labelling to result in an 11% drop in per capita consumption and what the company expects to do if this is not delivered.	Thank you for your response. We respond to these concerns further down.	No	N/A
2	CCW	The non-technical summary is clearly written but we feel that there could be more detail on the company's proposed approach on contributing to the 50% reduction in leakage, especially how customers' views have shaped this.	We have incorporated our leakage ambition into the revised draft WRMP24 non-technical summary.	Yes	Revised draft WRMP24 Non-technical summary
3	CCW	What the options considered, and the plan as a whole, means for customers. For example, by including information on bill impact and more detail on how the company will work with household and non-household customers to help them improve water efficiency.	We have incorporated a high level summary on how we will aid household and non-household customers to improve their water efficiency. We have not included details on bill impacts as we do not believe that it is reflective of the holistic bill impact of our customers, for example: bill impacts also include water recycling enhancements. We remain committed to discussing bill impacts with our customers through the business planning and Long Term Delivery Strategy processes.	No	Revised draft WRMP24 Non-technical summary
4	CCW	The plan sets out Anglian's ambitions to reduce customer demand in the long-term and states that it expects future Government policies on labelling white goods to result in a reduction of 11 litres per head per day. However, the Government policy is not yet in place. What Anglian plans to do to ensure that it will still achieve a reduction of 11 litres per person per day, even if the Government policy is not implemented?	We have included an assessment of government led interventions in our preferred plan forecast. This assessment has been based upon the WUK/Artesia Water UK 'Pathways to long-term PCC reduction' reported outcomes. We concur with Waterwise and other key stakeholders that all parties should play their part in driving water efficiency and will lobby (along with others) for this policy to be put into legislation, as speedily as possible. In light of the fact that there is some uncertainty regarding the implementation of this strategy, we have ensured that the impacts are weighted to the later stages of the forecast. As noted we are currently intending to implement our most ambitious program of water efficiency measures along with our full roll-out of smart meters. If government interventions do not materialize, we will look to accelerate our programs, but it must be noted that to still achieve further additional savings of 11 l/h/d will be a significant challenge. We will monitor the effectiveness of demand management measures in our region and will adjust them, as is feasible.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 7 and 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
5	CCW	**Response to consultation question one- general approach** In general, we agree that, taking all of the issues into consideration, including sustainability and affordability, the choice to build two new reservoirs is reasonable. We also agree that desalination can be costly while generating insufficient benefits. However, we would like to see more emphasis on reducing the barriers to re-using water. While this option can be contentious for customers, and costly if Anglian Water has to build new infrastructure, given the scale of likely future challenges, we think Anglian Water could do more work to consider how to reduce these barriers.	We thank the CCW for its response. Regarding reuse, we have a scheme (Colchester reuse) included in our WRMP, and we have research underway looking at barriers to reuse and how these could be addressed. We continue to work with the All Company Working Group on this matter.	No	N/A
6	CCW	**Supply management- approach to leakage** The WRMP states that Anglian expects to make a fair and equitable contribution towards the target of reducing leakage, taking account of the fact that it has one of the lowest levels of leakage in the country and has already done a lot, including reducing the time taken to mend leaks. To this effect, the company is expecting to reduce its leakage by 23.7%. The industry target for leakage is 50%. However, Anglian feels it would not be able to achieve this without undertaking a programme of mains replacement at a cost of £20 billion, which would be disproportionate, especially in relation to projected cost of £3 billion for the two reservoirs. We agree that a proportionate approach to leakage is reasonable, especially if this avoids costly work that delivers only limited benefits. However, it is not clear to us what, if any, discussions Anglian has had with other water companies in England and Wales to ensure that the target of reducing the overall leakage across the country by 50% can still be met if Anglian reduces its leakage by half of this goal. We would like Anglian to clarify this.	As part of our revised draft WRMP24, and in the light of our consultation, we have reviewed our leakage reduction program. We have, consequently, included our maximum feasible leakage reduction program, achieving a reduction of 38% (from the 2017/18 base-line) by 2050. This reduction is now more in alignment with the anticipated reductions form other water companies. Additionally it should be noted that if the 50% reduction for leakage is applied as a set of national attainment curves, Anglian Water will be below these targets by 2030 and very significantly below, by 2050. We have discussed leakage targets with our neighbouring companies in WRE. However, it is not within the remit of individual companies to determine the relevant contribution of other companies; this is a matter for both companies and regulators to evaluate. We would, however, encourage other companies to match the achievements of Anglian Water with respect to leakage reduction.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 4
7	CCW	**Response to consultation question two** We generally agree with the three-tiered approach. However, we have some comments. **Demand management- Water efficiency** Although the plan mentions how the company will work with the non-household sector to improve water efficiency, it does not seem to include any targets in relation to this work. The non-household has, so far, failed to deliver a market for water efficiency assistance for business. The introduction of a new business demand Performance Commitment by Ofwat in the PR24 final methodology means	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50. Where feasible, we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		there will be greater transparency and an opportunity to set challenging targets. However, this regulatory measure will not reduce demand by itself. We would like to see greater innovation and ambition in demand management, with Anglian showing how it will engage with customers and retailers on joined up strategies to help reduce demand. Overall, therefore, we feel that there needs to be greater clarity on two issues: -What Anglian plans to do to ensure that it will still achieve a reduction of 11 litres per person per day, even if the Government policy is not implemented. -The outcomes that it is aiming to achieve from its engagement with the non-household sector.	('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 demand forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners.		Revised draft WRMP24 Demand forecast technical supporting document, Section 7
8	CCW	In addition to this, we felt that the non-technical summary would benefit from more information on government led interventions and non-household sector engagement, especially in relation to what they will mean for customers. For example, it would be useful to explain how the company proposes to engage with both household and non-household customers to help them reduce water consumption.	We have incorporated this into the revised draft WRMP24 non-technical summary.	Yes	Revised draft WRMP24 Non-technical summary
9	CCW	**Response to consultation question three** In general, we agree with this approach and have no comments to add.	We thank the CCW for its support.	No	N/A
10	CCW	**Response to consultation question four** We support metering as the fairest way to charge customers for their water use. However, there will always be a proportion of customers who will struggle financially, as well as customers who are worse off after having a meter installed, for example those with a medical condition that leads to a more water use. It is vital that Anglian Water supports these customers at every stage of the metering journey by providing relevant information and advice. This should include clear explanations of the potential benefits of installing a meter, advice on how to save water and information about financial help for those customers who may be struggling financially.	As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering program. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options to assist these customers and will ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups.	Yes	WRMP24 Demand management preferred plan technical supporting document, Section 7

2.14 Chelmsford City Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Chelmsford City Council	CCC considers that the draft is clear and comprehensive.	Thank you for your positive feedback.	No	N/A
2	Chelmsford City Council	**Response to consultation question one** CCC supports this approach. The two new raw water reservoirs (one in the Fens, one in South Lincolnshire) will, when operational, supply water to 625,000 homes. The creation of two reservoirs has benefits for local communities, wildlife and does provide opportunity for energy creation. Reservoirs are a more environmentally friendly approach to the supply of clean water than the extraction of groundwater. The re-use of water from the WRC at Colchester is supported to help meet the shortfall in water in the short-term.	We thank the Council for its support.	No	N/A
3	Chelmsford City Council	**Response to consultation question two** CCC acknowledges that there is a need for better demand management which includes smart metering promotion of water efficiency measures (such as shower timers) and allowing users to have a better understanding of their usage. CCC does have a planning policy (Local Plan Policy DM25) for all new dwellings which limits the amount of water usage per person per day. Anglian Water has also identified that further improvements in terms of water leakage and water efficiency can be achieved. These are inextricably linked to meters to help provide more detail and data on water flow.	We thank the Council for its support.	No	N/A
4	Chelmsford City Council	**Response to consultation question three** Chelmsford lies within an area of water stress. With climate change and increasing occurrences of drought it is important that the amount of water used does not adversely impact on local wildlife or the environment. The least carbon heavy and least destructive approaches would be supported. These do also have to be weighed up against cost-effectiveness and affordability. The recognition that there is an opportunity to deliver wider environmental enhancement is supported. In addition to this any new infrastructure should always aim to reduce or mitigate any harm to the environment. CCC supports the aim of Anglian Water to be operational net zero by 2030 and the fact that they will be voluntarily giving up 85 megalitres a day of abstraction licences by 2025.	We thank the Council for its support.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
5	Chelmsford City Council	**Response to consultation question four** CCC supports the principle of compulsory smart metering of users (both domestic and non-domestic), alongside financial support packages for customers for whom this would present an affordability challenge.	We thank the Council for its support.	No	N/A
6	Chelmsford City Council	It is understood that changes in work patterns since Covid-19 means that domestic users are now using more water on average per person when compared to pre-pandemic. Therefore, more work should be done to encourage lower usage for customers through communication and efficiency measures. Anglian Water should be as proactive as possible to raise awareness of any cost implications for those not on meters currently, particularly among vulnerable customers.	Throughout the Covid19 pandemic we have monitored changes in both household and non-household consumption. For our revised draft WRMP24 submission we have now moved our base-line for the forecast from 2020/21, a stable view pre-pandemic, to a post Covid19 base-line position of 2021/22. We have, consequently, reviewed our inclusion of Covid factors to reflect the fact that we were still experiencing some impacts of Covid19 in 2021/22, due to social changes and working from home. We expect these effects to subside. We continue to closely monitor consumption impacts due to the pandemic and will reflect this in our future forecasts and assessments. We have been and continue to monitor impacts on our most vulnerable customers and continue to provide assistance including through bespoke tariffs.	Yes	Draft revised WRMP24 Demand management preferred plan technical supporting document, Sections 7 and 10

2.15 Customer No.1

Number	Consultee	Summary of response	Our response	Change made	Where further information can be found
1	RM Customer	I am a customer of yours and am concerned about the impact of water overuse on the rivers in our area, and beyond across the region. Your draft Water Resources Management Plan recognises these threats but does not go far enough towards resolving them. The plan must commit to greater action to tackle excess use and its causes. This is vital to ensure that future water supplies are sustainable in the face of a changing climate and growing population, and are secured with minimal impact upon local rivers, lakes, wetlands and wildlife. I want to see your plan: -Prioritise nature: Ensuring that having enough water in our rivers to support healthy and abundant wildlife is a top organisational priority. -Reduce water use: Helping households and businesses save water and supporting vulnerable customers, and significantly reducing leakage. -Use win-win natural solutions: Prioritising nature-based solutions - like wetland creation - to help tackle flooding, pollution, and replenish water supplies, making sure every project improves wildlife.	We understand your concerns over the impact of water overuse in rivers across the Anglian region. Our plan ensures we maintain a secure supply of water to our customers, whilst continuing to protect and enhance the environment around us. This is done through environmental assessments of the plan, identifying potential mitigation measures and also enhancement opportunities. A key driver to our plan is environmental destination; within our revised draft WRMP24, there is a significant programme of supply-side infrastructure required to reduce our abstractions and return further water into the environment. We are about to commence further investigations into the environmental destination, to understand abstraction reductions and the measures needed to improve our environment. In addition, within our revised draft WRMP24, we have an ambitious demand management portfolio to reduce water use. In terms of nature-based solutions, these will be explored within the fore-mentioned environmental destination investigations and will inform the next round of plan-making (WRMP29).	No	N/A

2.16 Customer No.2

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
1	Customer No.2	**Response to consultation question one** I support Anglian Water placing provision of 2 new reservoirs at the heart of their proposals. I would urge them, however, (and this includes DEFRA, the government and any other regulatory bodies with responsibility) to pull your fingers out. Whilst I recognise building of reservoirs is a large scale task I would say A) The need nationally and within Anglian Water's area of responsibility for new storage capacity -reservoirs) has been known for decades and B) We have plenty of relatively recent experience in building such reservoirs. That said I support the provision of new reservoirs.	Thank you for your support. We are seeking to advance the reservoirs as quickly as possible which is why they are in the RAPID process. Their development will take time; we need to ensure that we engage with customers and stakeholders as we progress designs, carry out further investigations on the identified preferred land parcels, and then undertake a complex planning process through a Development Consent Order. Once we have started construction, the sheer amount of earthworks will take many years to complete and, to some extent, will be constrained by the weather conditions we experience.	No	N/A
2	Customer No.2	**Response to consultation question two** I support the three-tiered approach in the plan but the detail behind demand management is completely lacking and as such unacceptable.	We have detailed all aspects of our preferred plan in our three demand related reports: Demand forecast technical supporting document - this details the modelling processes that have generated our preferred plan. Demand management preferred plan technical supporting document - this details our preferred plan and the reasoning that has informed our preferred demand management strategy. Demand management option appraisal technical supporting document - this details our option appraisal process for the selection of our preferred plan. Our preferred plan, which involves the full roll-out of smart metering by 2030 and a leakage reduction of 38% (from 2017/18) by 2050, along with water efficiency options and non-household demand reductions, has been based upon robust and systematic modelling of options applied at a granular level (cohort by cohort). In deriving our plan we have been mindful of and taken into consideration: - Defra/EA targets and policy, - our base-line position with respect to leakage, PCC, non-household demand - projected growth for both household and non-household properties, population and demand and - realistic / feasible assessments of demand management option impacts. This has led us to generate out-turn values for PCC, leakage, non-household demand and demand per person, that are based upon realistic assumptions and pragmatic assessments.	No	Revised draft WRMP24 Demand forecast technical supporting document Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
3	Customer No.2	The detail behind the supply-side options is completely lacking and as such unacceptable.	More detail is available in the revised draft WRMP24t.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document, Section 6
4	Customer No.2	Desalination plants are mentioned a number of times and whilst I acknowledge that they note this might not be an appropriate process I should like to record that I would be absolutely against this. We absolutely can, and must, ensure we don't go down the route of desalination - These plants pose a serious environmental risk as the waste salts are extremely toxic and will need managing. These plants also use vast amounts of energy which we most certainly have better uses for.	All of our WRMP supply side options undergo carbon emissions impact assessments and rigorous environmental assessment. At this moment in time, the widely accepted and understood industry standard means of desalination is Reverse Osmosis. While there are developments in the field, in reality this technology is nearing its optimal performance ability and there are not going to be large improvements made in energy efficiency - for example, new 'batch technologies' are looking to improve energy efficiency by around 5%. There may be new technologies in the future, and when they arise we want to be at the forefront, but in the meantime we have to look at best use of the technology available to us now. We shall be working with academic institutions to look at brine management strategies, to reduce the volume, concentration and impact of brine discharges. We will seek opportunities for mineral recovery, alternative uses and salt wetland habitat creation. We are also working with expert consultants and water companies from around the world that are successfully building and operating desalination to learn best practice so we can implement the technology the right way, from day one. By looking to collaborate with other sectors such as hydrogen production and offshore wind, we feel confident we can manage the long term carbon impacts of this technology.	No	Revised draft WRMP24 Supply-side options development technical supporting document
5	Customer No.2	**Response to consultation question three** Anglian Water state that they don't want to implement "quick fixes" for environmental protection and that they want to achieve the legislated targets (I note here that the government's recently published targets are pathetic - with many targets either watered down ore removed entirely and timescales being pushed into the far distant future - shameful). I agree that Anglian Water should not be rushing for quick fixes or indeed popular wins. But I note that they don't mention at all in their entire document the current and on-going sewage scandal. I have not a shadow of doubt that Anglian Water are fully aware of where the majority of sewage spills are and why they are happening and indeed what needs doing to remedy them. In the majority of cases fixes will inevitably involve disruptive and expensive (very expensive) works. Why is there no mention of these at all? Does Anglian Water not acknowledge the public's rightful revulsion at their continued desecration of our environment?	The purpose of our WRMP is to address our long term water security needs; it does not consider our water recycling needs as this is undertaken through other long term strategies. Please refer to our Drainage and Wastewater Management Plan and website for details on the actions we are undertaking to improve our pollution record.	No	N/A

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
6	Customer No.2	**Response to consultation question four** Anglian Water state they want to implement compulsory metering; In principle I do support this. However. It did not escape my attention that nowhere in their draft do they mention leakage. They brag in their website that they are the best water company in detecting and fixing leaks. Given the appalling national record on water leaks I'm not persuaded that being the best in detecting leaks per km of pipe (they should be measuring cubic meters of loss by the way) is anything to shout about. I would insist that compulsory metering is tied to legally binding targets in reducing leakage and those targets should be extremely burdensome.	We are committed to reducing leakage in both our mains network and for our customers with regard to customer supply pipe leakage (saving them money). As we describe our intention is to reduce leakage to be 10% of our daily demand requirement and to reduce customer supply pipe leakage by 70% by 2050. We currently record the lowest levels of leakage in comparison with other water companies (for the base-year of the Water Resources Management Plan, we recorded our lowest leakage of 173M/ld), but are ambitious to reduce this much further. As an industry, all water companies are set challenging targets for leakage, per capita consumption, as well as other metrics. However, we face significant challenges with regard to growth and sustainability, and so need to maximise our demand reduction strategy as part of our combined supply/demand strategy. Additionally, our customers have indicated that they consider it most fair for people to pay for the amount of water they use. We now have over 80% of our customer on billed measured charges, with 90% having a meter. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. This is detail in our revised draft Demand management preferred plan technical supporting document. With regard to compulsory metering, we have consulted with a number of our vulnerable customers to understand and try to alleviate their concerns. We understand that there are particular groups of customers, who might be impacted, and we are keen to help them as much as possible through any transition period. We do currently have a number of tariffs designed to help our most vulnerable customers and we will work to ensure that these will be developed further in parallel with any compulsory programme.	No	Revised draft WRMP24 Demand forecast technical supporting document Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document
7	Customer No.2	Overall I am pleased with the tone of the draft proposals but they completely lack enough detail or targets. They completely fail to mention let alone acknowledge the current sewage scandal and they don't mention their own failure to adequately look after the free resource they charge us for (leaks).	Thanks for the feedback on this. We have made our targets (and expected performance against them) more explicit in the relevant documents. We do not discuss water recycling needs, issues and targets in the WRMP as the purpose of a WRMP is to address our long term water security needs. Please refer to our Drainage and Wastewater Management Plan and website for details on the actions we are undertaking to improve our pollution record.	No	N/A
8	Customer No.2	Do Anglian Water have any plans to tie environmental and other quality metrics (e.g. supply failures, hose-pipe bans, leaks and so on) to performance related pay? And if not why not?	WRMP24 is concerned with providing a safe, resilient supply of water to our customers; it does not discuss performance related pay. For further information on Anglian Water's Performance Contract and its relationship to bonuses, please refer to our Annual Integrated Report which is available on our website.	No	N/A

2.17 Customer No. 3

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Customer No. 3	**Response to consultation question one** Yes, the two new reservoirs should be delivered as soon as possible. Why do the lead times need to be so long. The reservoirs should be built as a matter of urgency.	Thank you for your support. We are seeking to advance the reservoirs as quickly as possible which is why they are in the RAPID process. Their development will take time; we need to ensure that we engage with customers and stakeholders as we progress designs, carry out further investigations on the identified preferred land parcels, and then undertake a complex planning process through a Development Consent Order. Once we have started construction, the sheer amount of earthworks will take many years to complete and, to some extent, will be constrained by the weather conditions we experience.	No	N/A
2	Customer No. 3	**Response to consultation question two** The three-tiered strategy seems a logical approach. However, an important point overlooked in demand management is the apparently unconstrained development of housing in the Cambridge area, which is putting a huge additional demand on dwindling water resources. Cambridge has probably well exceeded the government's quota for new housing and I feel that there should now be a halt to further housing or business building schemes until the water supply is more secure. Otherwise existing residents will have to pay a penalty for these new developments. In addition, there should be greater incentives for water companies to repair leaks.	In developing our revised draft WRMP24, we have followed Water Resource Planning Guidance and ensured that we have included property and population (and consequently demand) projections based upon the most recent Local Authority data. This has been collated for Anglian Water by our external demographic consultant. These forecasts have been updated in January 2023 for our revised draft WRMP24. Additionally, as part of our preferred growth forecast we have included an estimate for growth associated with the Oxford-Cambridge Strategic Growth Corridor. We are currently liaising with relevant stakeholders with regard to water resources for the Cambridge area, but note that we are in a water scarce area and that new supply-side options (as well as water efficiency policies) will be required to manage future growth and environmental improvements in our region.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 5
3	Customer No. 3	**Response to consultation question four** Compulsory water metering is a fair proposal, but the installation of meters should be free to customers and there should be safeguards for people who are under financial hardship. Fresh water is a basic human right.	The installation cost of smart meters will be in included in the general bill assessment for AMP8. We already have a wide range of safeguards in place to help vulnerable customers and we will continue to explore their suitability for WRMP24.	No	N/A

2.18 Customer No.4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Customer No.4	**Response to consultation question four** People should have some choice in regards to whether they are metered if the area is not under serious water stress.	We currently give our remaining unmeasured but metered customers the choice of whether they pay on measured charges for the water they use or based on rateable value, whilst encouraging them to switch to being measured. However, we are in a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options to assist these customers and would be keen to ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 7 and 10
2	Customer No.4	Smart meters are an invasion of privacy when installed on customer supply pipes. There also doubts about who handles the data from them, as well as their accuracy. I would be interested in having a device that I could operate within my house to determine if I had any leaks.	Whilst developing our smart meter strategy, we have embedded data security into our systems and understand our obligations under the GDPR regulations. We understand the sensitivity of this data and adhere to internal protocols which govern exactly who is able to access the data and for what purpose. We are finding that smart meters are providing great benefits for our customers, not only in finding leaks, but also in aiding in their understanding of their water consumption.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 7 and 10

2.19 East Suffolk Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	East Suffolk Council	**Response to consultation question one** East Suffolk Council supports the effective planning for short, medium and long term water supply through supply and demand side options in a manner that does not limit future development growth, measurably improves environmental sustainability throughout East Suffolk and limits the cost to East Suffolk water users. While the proposed reservoirs in the Anglian Water area lie outside East Suffolk, they may have implications in East Suffolk in relation to the need for other supply side options such as the planned desalination later in the plan period (earmarked for 2035-2039). The long term and adaptable nature of the proposals make it challenging to comment with certainty. However, it is recognised that long term plans require early an ongoing engagement with all affected stakeholders including East Suffolk Council as well as local communities.	We thank the Council for its support. We believe that engagement with customers and stakeholders is key to our plan. We actively seek early engagement with stakeholders and local communities when developing strategic solutions. We will continue this approach over the years to come.	No	N/A
2	East Suffolk Council	The environmental implications of desalination would need to weighed alongside the benefits that could be achieved through possible new reservoirs and should be informed by environmental assessments including Habitats Regulations Assessments. As desalination typically uses a very high amount of energy, if this is not provided by renewable sources this would perversely contribute to climate change, which will be impacting water availability challenges over the coming decades, as flagged in the draft plan.	All of our WRMP supply side options undergo carbon emissions impact assessments and rigorous environmental assessment. At this moment in time, the widely accepted and understood industry standard means of desalination is Reverse Osmosis. While there are developments in the field, in reality this technology is nearing its optimal performance ability and there are not going to be large improvements made in energy efficiency - for example, new 'batch technologies' are looking to improve energy efficiency by around 5%. There may be new technologies in the future, and when they arise we want to be at the forefront, but in the meantime we have to look at best use of the technology available to us now. We shall be working with academic institutions to look at brine management strategies, to reduce the volume, concentration and impact of brine discharges. We will seek opportunities for mineral recovery, alternative uses and salt wetland habitat creation. We are also working with expert consultants and water companies from around the world that are successfully building and operating desalination to learn best practice so we can implement the technology the right way, from day one. By looking to collaborate with other sectors such as hydrogen production and offshore wind, we feel confident we can manage the long term carbon impacts of this technology.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document, Sections 4 and 7, and Appendix A
3	East Suffolk Council	**Response to consultation question two** Overall, the approach of a combination of both demand and supply side options is acknowledged and it is expected that a range of measures should provide resilience in planning for water supply over future years. The Council	We thank the Council for its support.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		supports measures to address demand and considers this should be the priority, however it is acknowledged that supply side measures will also need to form an important part of the plan to 2050.			
4	East Suffolk Council	It is noted that there are significant supply side options proposed within the plan, including the proposed desalination in Felixstowe (alongside other supply side proposals within East Suffolk proposed in the Essex and Suffolk water area). These are significant infrastructure projects, both individually and, for East Suffolk, cumulatively and engagement with the Council at an early stage is essential to ensure that the Council is well-informed and can properly plan for its role in the consideration of such schemes. Engagement with communities, who may not be familiar with schemes of such a scale or nature, will also need to be carefully planned for at appropriate times.	We will actively seek engagement with East Suffolk Council and the relevant local communities when schemes start to be developed further. Felixstowe is no longer a chosen supply-side option in our revised draft WRMP24; as part of our best value planning process we have chosen other options that could bring more benefit to our region.	No	N/A
5	East Suffolk Council	Major infrastructure projects typically involve large direct/indirect CO2 emissions during construction and operation, so the climate change impacts should be given serious consideration in the cost benefit calculation compared to other potential solutions outlined in the draft plan.	We have included both embodied carbon and operational carbon as key metrics within our best value planning framework assessment. Our revised draft WRMP24 Decision making technical supporting document has a comparison of the carbon impacts of the four plans which were taken forward for detailed assessment. Please note that the numbers reported in this section are based on our PR24 baseline carbon models, and the DYAA utilisation scenario, which is higher than would be expected during Business As Usual. We would also expect both the operational and capital carbon impact of our plans to be significantly lower than this in reality, because of our overall net zero strategy.	No	Revised draft WRMP24 Decision making technical supporting document, Section 8 and Appendix D
6	East Suffolk Council	It is noted that meeting forecast demand alongside achieving environmental outcomes and acknowledging the impacts of climate change will involve both supply and demand side options. The Council supports that demand side measures have been considered 'first'.	We thank the Council for its support.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
7	East Suffolk Council	The company should continually review its demand management options as further opportunities to increase the impact of managing demand may become available or more feasible.	Whilst considering the importance and critical role that demand management will play in achieving our preferred revised draft WRMP24 out-comes, we understand that we must keenly monitor the effectiveness of these measures, as the revised draft WRMP24 plan unfolds. This will be needed to ensure the effectiveness of our water efficiency measures and allow the timely implementation of adaptive plans, in the case that demand management options are less successful than initially expected. We are consequently, instituting our 'Demand management Monitoring Framework'. This will allow us to fully leverage the consumption data that smart meters are facilitating. Analysis of the detailed daily smart meter data will allow us to look into underlying consumption patterns: · understand current customer behaviours (through cohort analysis and usage patterns). · investigate the effects of different demographic groups (age, occupancy, house type) on demand and how changes in these will impact consumption over time. · analyse the impacts of weather, climate and drought on demand. · understand the long term impacts of the Covid19 pandemic and resulting societal changes (working from home). · determine the effectiveness of government led interventions including 'white good' labelling and mandatory standards. As we implement water efficiency and demand management options we will need to determine how effective they are and how we might improve their efficiency. The 'Demand management monitoring framework' will, therefore, be designed to allow us to: · Investigate and understand our customers consumption patterns and attitudes to water consumption; this will allow us to model our base-line population and also understand how demographic change will modify our forecasts over time (aging). · Scientifically analyse our current demand management portfolio and ensure that our water efficiency teams are concentrating on the most effective options and targeting them at customers who will benefit the most. · Model and test demand management options, so that they can be realistically included in our future forecasts for WRMP29 and beyond.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 13

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
8	East Suffolk Council	The timeline for implementation of the plan shows a focus on demand management measures in the short term, which is welcome, however looking to reduce demand should feature across the timeline of the plan, with regular reviews providing an opportunity to review behaviours, opportunities and new technologies that could further reduce demand in the latter years/future iterations of the plan.	Our WRMP24 demand management plan has been designed to focus on certain aspects in the near term, including the completion of our smart meter programme by 2030, whilst in the longer term concentrating on further leakage reduction through mains replacement. Including government interventions we expect to save on average an additional 40Ml/d per AMP (5 year period) from 2025 to 2050, such that, by 2030 we will save 47Mld and by 2050 we will be saving 218Ml/d. We would consider this to be a balanced approach, to our near term and long term goals. As we reach full smart meter penetration, we will develop communications strategies to influence attitudes and behaviours in the long term, whilst also developing further our leakage and non-household demand reduction programmes.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document
9	East Suffolk Council	The plan should also incorporate the implications of the latest climate change projections as new data emerges.	We have included 3 RCMs from RCP8.5, 2 of which feature in target headroom. Additional text covering this query has been included.	Yes	Revised draft Supply forecast technical supporting document, Section 7
10	East Suffolk Council	Consideration should be given to whether more could be done to either strongly encourage or enforce sustainable water use practices within the non-household sector. National planning policy and guidance does not set out detailed provisions in relation to specifically reducing water demand in new nonhousehold uses and, whilst the Council's two Local Plans expect BREEAM 'very good' (which includes water efficiency measures) for some non-household uses, any role that Anglian can play in seeking to strengthen national policy and regulation in this regard would be supported.	As part of the revised draft WRMP24 demand management option development process, and in conjunction with our WRE partners, we have engaged with our regional Retailers and business customers, in order to gauge opinion on further water efficiency measures for the business sector. This recent engagement (in association with WRE and 'Blue Marble') has been conducted to understand the retailer perspective regarding the promotion of water efficiency; to develop and refine propositions and understand and overcome barriers; to explore these propositions and how they might be implemented with retailers and non-household customers. Based upon this we have developed a number of options that we wish to implement in co-ordination with our Retail partners. These options have been considered in partnership with other wholesalers in the WRE region. We fully understand that Retailers are best placed to delivery these options, but also realise, that as the wholesaler, we are in a position to design option and gain funding through the WRMP enhancement programme. We also agree that new non-household development should be designed to be as water efficient as possible, potentially incorporating water re-use as an option. As part of our 'Demand Reduction Discovery Fund' we intend to trail and investigate the potential for 'water neutrality', 'water smart communities', grey-green-black water re-use and the improvement of government design standards. We will look forward to liaising further with all key stakeholders, as we implement WRMP24 and develop future plans.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
11	East Suffolk Council	**Response to consultation question three** Efficiency and demand reduction should be prioritised and the environmental implications of desalination would need to weighed alongside the benefits that could be achieved through possible new reservoirs. Desalination typically uses a very high amount of energy, if this is not provided by renewable sources this would contribute to climate change. There may also be opportunities to bring about greater environmental benefits through aligning with other environmental enhancement objectives, for example integration of enhancements to the water environment within future Local Nature Recovery Strategies. The shorter-term constraints should not hold back the delivery of the wider, longer-term benefits of an environment-led approach, especially in light of future climate change impacts.	Our revised draft WRMP24 Decision making technical supporting document sets out how the carbon impact of our plan aligns with the commitments of our net zero strategy.	No	Revised draft WRMP24 Decision making technical supporting document, Appendix D
12	East Suffolk Council	**Response to consultation question four** East Suffolk Council considers smart metering to be an effective means of reducing unnecessary water use while also providing households with transparent and up to date water use and cost. The Council produced an Environmental Guidance Note in 2020 which encourages new homes and extensions to be fitted with water meters (amongst other water saving measures).	We also believe that smart metering is an effective means of reducing unnecessary water use, whilst providing households with transparent and up to date water use and cost. We will continue to build on the benefits of smart metering for WRMP24.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document: Section 6,7,10.
13	East Suffolk Council	As recognised in the draft plan, and the accompanying Demand Forecast, growth planned for in the Local Plans will influence future household demand for water. The approach of using Local Plan data to inform the forecasting of household growth is therefore supported.	We thank the Council for its support.	No	Revised draft WRMP24 Demand forecast technical supporting document: Section 4,5
14	East Suffolk Council	It is noted in the second paragraph of section 5.4 of the 'Demand Forecast' document that "regional growth should not be constrained by the availability of water". It is important that water companies and local authorities work closely together in order that LPs and WRMPs can both support the delivery of growth.	Underpinning the forecast for future water demand is a detailed understanding of demographic change, new development, household formation, population and occupancy changes in the Anglian Water region. Robust housing and demographic forecasts are a key consideration in the planning guidelines established for both the Water Resource Management Plan (WRMP24) and WRE processes. We have, consequently utilized the expertise of an external demographic company, to collate LAUA (Local Authority/Unitary Authority) plans (including all supporting data) for all Local Authorities in our region. For our revised draft WRMP24, we have taken a pragmatic approach, including a conservative version of this strategic growth, in order to minimise future risk from unexpected population growth in our region (Our OxCam1b scenario). This reflects the fact that the current Government	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 5

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			position has been revised with regard to the potential for OxCam strategic plan development. However, despite significant uncertainty, growth in this part of our region around Cambridge still appears to be a strategic priority. Consequently, the chosen scenario maintains near term Local Authority planned growth (higher than trend) beyond AMP7 (rather than returning to trend in the long term) in these known high growth areas. This would seem to be the most pragmatic approach, given recent growth in the areas covered by the arc, and the fact that the East of England has experienced the highest growth rates in the UK since the 2011 census (>8%). This forecast has been aligned with our WRE partners and is in accordance with WRMP24 Guidance. This and other key scenarios (used for sensitivity testing) have been updated for our revised draft WRMP24.		
15	East Suffolk Council	For the latter years (2036 onwards) it isn't clear whether the Government's Local Housing Need (as calculated through the standard method) has been applied - this involves 'uplifts' to the household projections in many cases and would provide a better reflection of current Government policy (albeit there is still a high degree of uncertainty when looking that far ahead) over the latter part of the WRMP period than household projections alone.	In order to facilitate the collation of Local Authority Planning information, we have utilised a specialised demographic analysis company to collate and produce assessed household build trajectories for all the 69 Local Authorities in the Anglian Water Region for both the WRE and WRMP 2024 planning processes. We have also sought to align core scenarios with our key neighbouring regional groups, including Water Resources South East (WRSE). These 'Plan' based projections (and supporting data) have been used to inform near term projections of both housing and population growth. Beyond the period of Local Plans we use ONS projections. For our East Suffolk water resource zone we are forecasting >30K properties over the plan period.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Sections 2 and 5
16	East Suffolk Council	In relation to non-household growth, whilst reference is made to considering the East of England Forecasting Model (which is the same model that has underpinned the employment forecasts in the Council's two Local Plans), there doesn't appear to be reference to use of local authority planning data on forecast / planned employment growth, and therefore the Council is not clear whether this has informed the forecasts.	As part of our forecasting process, we have developed a non-household demand forecast model in partnership with specialist consultants. This model uses historic data to generate future trends in growth for segmented non-household industrial categories. Additionally the forecast then applies appropriate influencing factors based upon the selected growth forecast population, GVA, or employment forecasts. As noted for this model we have utilised the EEFM model and not directly referenced Local Authority projections. As we continue to develop our modelling processes we will investigate how best to include this data for future modelling purposes, but also understand that considerable uncertainty with regard to non-household water demand is implicit in these forecasts. As we note, although there is a link between population growth and non-household demand, there is little correlation, as it is so dependent upon the industrial sectors that appear in future (e.g. food processing, industrial process users).	No	Revised draft WRMP24 Technical Report - Demand forecast, Sections 2 and 5 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 3

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			Additionally we have derived an assessment for potential demand due to Hydrogen and carbon capture projects in our region (noting that these will be non-potable demand), based upon industry feedback from relevant partners. We are seeing significant near-term volatility with respect to non-household demand with requests for large volumes by specific sites. This is causing increasing pressure on our ability to deliver these requests within the current government target framework, for reductions in non-household demand, reductions in DI per person and reductions in levels of permitted abstraction. We have, consequently, used scenario testing to develop adaptive alternatives to the proposed plan, with defined trigger points in the near term, for adaptive plan development. Significant uncertainty surrounds potential near term non-household growth and we will consequently, continue to liaise with all relevant parties, to facilitate this growth, whilst also progressing our water efficiency strategy. However, we are also mindful that EA/Defra expect non-household demand to be reduce by 9% by 2038 and 15% by 2050. These targets are proving to be very challenging to achieve, using our modelling assumptions and growth. We will continue to work with Retailers and Non-household customers as we develop, implement and validate our non-household water efficiency strategy.		
17	East Suffolk Council	Consequently, there is a level of uncertainty in relation to domestic and non-domestic development growth when considering demand over a long-term time period to 2050. The uncertainty should be acknowledged by building in flexibility and contingency and through ongoing close working between Anglian Water and local authorities.	Whilst developing our demand forecast we have utilised current local authority planning information to derive future projections, based upon population growth, employment and GVA forecasts. These have been applied to sector by sector regression based forecasts developed from data collected over the last 20 years. Understanding that we are currently experiencing significant growth we have uplifted local authority projections by using one of our highest forecasts for non-household growth, based upon our highest growth forecast ('OxCam_2b_r_P'). This forecast includes an assessment of growth related to the potential Oxford-Cambridge growth corridor. Additionally we have derived an assessment for potential demand due to Hydrogen and carbon capture projects in our region (noting that these will be non-potable demand), based upon industry feedback from relevant partners. We are seeing significant near-term volatility with respect to non-household demand with requests for large volumes by specific sites. This is causing increasing pressure on our ability to deliver these requests within the current government target framework, for reductions in non-household	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 9 and 13.

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			demand, reductions in DI per person and reductions in levels of permitted abstraction. We have, consequently, used scenario testing to develop adaptive alternatives to the proposed plan, with defined trigger points in the near term, for adaptive plan development. Significant uncertainty surrounds potential near term non-household growth and we will consequently, continue to liaise with all relevant parties, to facilitate this growth, whilst also progressing our water efficiency strategy.		
18	East Suffolk Council	It will be important for Anglian Water to work with local planning authorities on an ongoing basis, during both the preparation and implementation of local plans, in order that there is an early understanding of how potential future growth plans could impact on the projections for demand for water, to ensure that water planning is responsive to wider economic and growth objectives and also that Local Plans can be developed based on an understanding of up to date water supply positions.	We aim to work with local planning authorities on an ongoing basis. This will allow us to take into account local plans, as well as keep councils up to date with our investment plans.	No	N/A

2.20 En-Form

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	En-Form	**Response to consultation question two** We support this 3 tier approach with the building of the 2 extra reservoirs as the best first choice proving the environmental impact of this is minimal. We agree that the extra cost and carbon impacts of both desalination and water reuse makes these undesirable options when we are trying to reduce our carbon impact. We agree with the approach to build the reservoirs even though they have a longer lead time and recognise this may impact on abstraction in the short and medium term. We agree that abstraction from the natural environment needs to be reduced.	We thank En-Form for its support.	No	N/A
2	En-Form	**Response to consultation question four** In a rapidly growing region in a rapidly growing country, water demand needs to be curbed. We support the compulsory installation of water meters. We are glad that at the current time only 9% of the region is still unmetered. However, demand needs to be managed more vigorously through tariffs. At the moment the standing charge for many people is the major part of their bill and not much can be saved by reducing water usage. The tariff needs to be changed by removing the standing charge altogether and charging entirely for the water used. Whilst we understand the reason for a standing charge to ensure everyone pays for the water infrastructure, it is a big disincentive to reducing demand through behaviour change. We, as an environment centre, work with the public to reduce water usage but the payback time for fixing things like leaks at current water unit rates are too long to make them financially attractive. This means it is cheaper for people to live with the leaks.	As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options to assist these customers and would be keen to ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups. We agree that tariffs may have a part to play in future water efficiency drives. As part of our WRMP24 development we have reviewed the potential for tariffs. We intend to build upon the work currently being undertaken with regard to our smart meter programme and associated customer communications and design trials of potential tariff interventions (seasonal) as part of our 'Water Demand Reduction Discovery Fund' in AMP8. It is clear that any price interventions need to be supported by other, non-price activities. In the future, there is likely to be a strong link between our activities to promote water efficiency and our ability to successfully implement pricing interventions. Consequently, as we prepare for AMP8 and the WRMP24 programme, we will implement our initial tariff trial from April 2024. We have, therefore worked with the Centre for Competition Policy (CCP) at the University of East Anglia (UEA) to develop a robust methodology and provide guidance on trial design and data analysis, aligned to Ofwat's principles.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
3	En-Form	Whilst these factors are outside the control of Anglian Water we would like to see the following procedures implement and hope these points will be passed onto the relevant government departments: 1. That water companies become a statutory consultee on all planning applications and not just the local plan 2. That management of growth and ensuring that development in areas where there are not enough natural resources becomes part of the National Planning framework and is included in Local Plans 3. That the Environment Agency which is fully independent is fully funded and be made responsible for monitoring the water companies. Self regulation is not trusted by the population.	We thank En-Form for its comments.	No	N/A

2.21 Environment Agency

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Environment Agency	**Recommendation 1.1** The Environment Agency (EA) has concerns about the high level of risk in the company's preferred plan. If proposed demand management measures do not deliver assumed savings, or if the preferred supply options are not feasible, or are delayed, the company may not be able to deliver its responsibility to provide the secure water supplies expected by customers and protect the environment. The plan highlights that baseline dry year water demand exceeds available supplies in the short term in many of the company's water resource zones. The company forecasts significant household and non-household growth and that it needs to leave more water in the environment. The EA expects the company to provide confidence that the preferred plan and the options within it are deliverable, best value and low regret	We have confidence that the preferred plan and the options within it are deliverable, best value and low regret.	No	Revised draft WRMP24 Decision making technical supporting document Revised draft WRMP24 Demand management preferred plan technical supporting document
2	Environment Agency	**Recommendation 1.1** AWS needs to demonstrate it can manage the risk to security of supply and the environment if the preferred options cannot be delivered by developing alternative options and progressing these to be available as soon as required.	We have set out adaptive planning pathways describing the alternative approaches we would take in the event of the preferred option delivery and timings not being achieved. We have considered the actions we would take in the following scenarios: - Fens reservoir later than planned. We would bring forward our Bacton Desalination option which will be designed in AMP8. - Lincolnshire reservoirs delivered later than planned. We would need to adjust our timing to deliver Environmental Destination and explore enhanced demand management options. -Late delivery of the Ruthamford South to Suffolk West and Cambs (via Cambridge Water) interconnector. We would require an adjustment to licence caps timings, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI. We would also explore the possibility of enhanced demand management. -Late delivery of interconnectors to Norfolk. We would require an adjustment to the timings of our licence capping, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI. We would also explore the possibility of enhanced demand management. - Marham abstraction is deemed infeasible. We would bring forward the Bacton Desalination option. This would also require an adjustment to the timings of our licence capping, noting that changes in the amount of water	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI. We would also explore the possibility of enhanced demand management. - Suffolk West and Cambs groundwater is deemed infeasible. We would require an adjustment to the timings of our licence capping, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI. We would also explore the possibility of enhanced demand management. - Demand management is less effective. We would bring forward desalination options, and look to adjust the timings of our licence capping, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI.		
3	Environment Agency	**Recommendation 1.1** The company needs to set out how it will monitor and report the progress and success of delivering its preferred demand and supply measures and the actions it will take to get these back on track if required or to change to alternative measures.	We have set out a series of adaptive pathways which describe our actions in the event of changes to our preferred programme due to delays in options, options becoming infeasible and demand management not providing expected benefits. This includes a summary of risk mitigation actions, monitoring points, decision points and trigger points.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10
4	Environment Agency	**Recommendation 1.1** To avoid short term deficits the company is dependent on deferring some changes to its abstraction licences until 2035 that are needed to meet the requirements of Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 to prevent the risk of deterioration in the status of waterbodies. The deferment is to allow the company time to develop its proposed preferred supply options, but this leaves the environment at risk whilst the company delivers these options. A new annex is needed; this should set out in detail the actions it will take at each source of supply to prevent environmental deterioration. This should include how the company's supply and demand measures will help to manage abstraction to within sustainable limits and set out how alternative options will be used if the preferred plan cannot be delivered or does not deliver the assumed supply and demand benefits.	We have produced an annex, to be shared directly with the Environment Agency and Natural England, which shows how our demand management strategy enables environmental deterioration to be avoided, and also shows the environmental sensitivity of our WRZs, including Environmental Destination abstraction reductions required, chalk streams, SSSIs and the location of our abstraction assets.	Yes	Annex to be issued to Environment Agency and Natural England
5	Environment Agency	**Recommendation 1.1** To manage the risk of deterioration to waterbody status, the plan relies on the success of demand management measures in the short term and on delivery of the Fens and Lincolnshire reservoir options in the medium	Our WFD assessment of the plan as a whole has looked at the potential risk of deterioration of water bodies. This assessment includes a range of mitigation and investigations that will progressed in the future at the project-level.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		term. These options carry risk and if the company's demand management options do not deliver the assumed savings, or its preferred supply options are delayed or cannot be delivered, there is a high risk it will need to increase abstraction at sources that could cause deterioration in the status of waterbodies. All measures need to be appraised to determine how the risk of deterioration in the status of water bodies will be managed (including catchment-based solutions) and it detailed how these will be implemented.			
6	Environment Agency	**Recommendation 1.1** AWS needs to demonstrate that it will move away from unsustainable sources of supply at a greater pace.	Our initial most likely scenario incorporates time limited licences reduced to average recent actual by 2030, all other permanent licences by 2036 (scenario 4). In response to stakeholder feedback we have developed a bespoke scenario to bring forward permanent licence caps such that all available resource is fully utilised. Starting with scenario 4 we identified surplus resource that could be fully utilised by bringing forward some of the permanent licence caps without triggering the need to develop additional schemes (such as desalination) at the start of the plan. We have also prioritised environmental destination reductions over drought resilience, by moving the drought in Ruthamford back to 2040. This creates a 15Ml/d surplus in 2036 which can be used to deliver environmental destination reduction in our most sensitive catchments.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6
7	Environment Agency	**Recommendation 1.1** The company needs to set out specific proposals for mitigation of environmental impacts where these are unavoidable.	Within our updated suite of environmental reports for revised draft WRMP24, mitigation measures for options have been presented. As we are currently at plan-level, the detail of the mitigation is not what would be expected for a project; as options begin to be progressed, mitigation measures will be developed further and to the appropriate amount of detail.	Yes	Revised draft WRMP24 WFD Sub-report Revised draft WRMP24 HRA Sub-report

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
8	Environment Agency	**Recommendation 1.2** Successful demand management is a key strategy to maintain the supply demand balance for the company in the short term, however the monitoring proposals set out in the demand management preferred plan appendix are still under development and lack detail. Overall, there is insufficient information on how the company plans to monitor its demand management programme and if any key decision points are identified and alternative options proposed, should the delivery of the programme be slower than expected. The company should provide a clear water efficiency monitoring programme throughout the planning period with particular focus on the first 10 years. This should include the specific actions the company will take to monitor its planned: · leakage reduction · per capita consumption reduction · non household demand reduction · Metering rollout · any other measures to reduce demand The company should set out the actions it plans to take if demand options fail to deliver, this should include identifying key decision points and alternative options.	Whilst considering the importance and critical role that demand management will play in achieving our preferred revised draft WRMP24 outcomes, we understand that we must carefully monitor the effectiveness of these measures, as the revised draft WRMP24 plan unfolds. This will be needed to ensure the effectiveness of our water efficiency measures and allow the timely implementation of adaptive plans, in the case that demand management options are less successful than initially expected. We are consequently instituting our 'Demand Management Monitoring Framework'. This will allow us to fully leverage the consumption data that smart meters are facilitating. Analysis of the detailed daily smart meter data will allow us to look into underlying consumption patterns: · understand current customer behaviours (through cohort analysis and usage patterns). · investigate the effects of different demographic groups (age, occupancy, house type) on demand and how changes in these will impact consumption over time. · analyse the impacts of weather, climate and drought on demand. · understand the long term impacts of the Covid19 pandemic and resulting societal changes (working from home). · determine the effectiveness of government led interventions including 'white good' labelling and mandatory standards. As we implement water efficiency and demand management options we will need to determine how effective they are and how we might improve their efficiency. The 'Demand management monitoring framework' will, therefore, be designed to allow us to: · Investigate and understand our customers consumption patterns and attitudes to water consumption; this will allow us to model our base-line population and also understand how demographic change will modify our forecasts over time (aging). · Scientifically analyse our current demand management portfolio and ensure that our water efficiency teams are concentrating on the most effective options and targeting them at customers who will benefit the most. · Model and test demand management options, so that they can be realistically included in our future forecasts for WRMP29 and beyond. We are also planning to actively monitor leakage reduction and non-household demand reductions as part of the Monitoring Framework.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 13

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
9	Environment Agency	**Recommendation 2.1** The Fens reservoir and Lincolnshire reservoir Strategic Resource Options (SROs) are vital options to secure public water supplies in the short to medium term. The company states that "the SRO reservoir options which through the regional plan have been identified as the most robust and low regret options." The reservoirs represent a significant opportunity for multi-sector benefits, but also have significant financial costs, as well as important non-monetary short and long term costs and benefits that need to be carefully appraised. There is currently insufficient evidence in the plan to allow reasonable and proportionate scrutiny by regulators and interested parties that preferred options, including their size and timing, are best value and low regret. The company should provide further information and justification that its preferred plan and the options within it are best value and low regret. This should include evidence that the timing and sizing of the reservoir options represent best value and that any decision to defer, or delay investment in other options is justified and does not put the environment and security of supply at risk.	In response to the consultation feedback to provide more evidence of the selection and size of the reservoirs, we have not modelled the regional plan options as 'must do', instead they are unconstrained and the EBSD model is free to select the preferred size of reservoir to suit the scenario. We have included further justification for the selection of the preferred plan and the robustness of the options included in it.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 3
10	Environment Agency	**Recommendation 2.1** There needs to be robust in-combination and cumulative environmental impact assessments for the delivery of the reservoir SROs.	We will be completing an Environmental Impact Assessment as part of the DCO application; this will assess the in-combination and cumulative effects of the reservoirs in detail.	No	N/A
11	Environment Agency	**Recommendation 2.1** The company should implement a significant programme of environmental monitoring, assessment, and modelling to determine potential environmental impacts of the reservoir SROs with confidence.	We will continue to develop and expand our programmes of environmental monitoring, assessment and modelling in relation to both reservoir SROs, currently these are progressing towards Gate 3. We will be completing an Environmental Impact Assessment and an Habitats Regulations Report as part of the DCO application, these - and other supporting information for the application - will have been informed by a significant programme of environmental monitoring, assessment, and modelling to determine potential environmental impacts.	No	N/A
12	Environment Agency	**Recommendation 2.2** The company has not included, in its feasible list, any demand side drought options such as changes to temporary use bans and non-essential use bans as well as drought permits and orders. It should consider and appraise all drought measures in the same way as any other type of option and take its drought options through the options appraisal and best value planning process. The company should also consider their role in helping to manage the risk of deterioration in the status of waterbodies.	Our revised draft WRMP24 Decision making technical supporting document describes how we have tested the effect of drought permits and drought demand savings as part of policy decision making, and shows the effects on our best value metrics. We have included drought demand savings from TUBs and NEUBs in our baseline Supply Forecast. We have tested whether changing our Levels of Service would increase Deployable Output in Aquator, but have found that it would not.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
13	Environment Agency	**Recommendation 2.2** The company has presented additional information about the effectiveness of demand side drought options to the EA, but this has not been included in the plan. Include information about the effectiveness of demand side drought options in its plan to improve completeness and transparency. The benefits of drought options should be consistent with the company's Drought Plan 2022.	Our revised draft WRMP24 Decision making technical supporting document sets out the effect of demand side drought options on increasing deployable output.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5
14	Environment Agency	**Recommendation 2.2** There is inconsistency of how individual water companies in Water Resources East (WRE) account for the benefits of drought measures in their dWRMPs, and both Essex and Suffolk Water and Cambridge Water have included the benefits of demand side drought measures in their plans in all zones. Work with other WRE companies to improve the consistency of representing drought measures in its plan and their role as options to help manage the risk of short-term deficits and the risk of deterioration in status of water bodies.	Our revised draft WRMP24 Decision making technical supporting document includes the benefits of demand savings from temporary use bans (TUBs) and non-essential use bans (NEUBs) within our baseline.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5
15	Environment Agency	**Recommendation 2.3** The level of detail presented in the plan for some preferred supply options is limited. For example, the proposed transfer of water from the Ruthamford South zone to the West Suffolk and Cambridgeshire zone (via Cambridge Water) is a vital resource option. It is needed by both Anglian Water and Cambridge Water to provide security of supply in the short to medium term and help manage the risk of causing deterioration in the status of waterbodies. Despite this importance, the EA has concerns that the plan lacks detailed information about the feasibility and deliverability of the option. The company should improve the level of detail presented for its preferred supply options by setting out a detailed programme of work to progress development of existing, new, and alternative supply options.	Thank you for this feedback. We have incorporated this information for revised draft WRMP24.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
16	Environment Agency	**Recommendation 2.3** Detailed deliverability appraisals of its options should be conducted to better understand technologies, planning timescales and constructability. The company should ensure its plan takes account of any decisions on its scheme acceleration proposals where applicable.	We have included further details on the deliverability of our options in our revised draft WRMP24. Deliverability has also been assessed at portfolio level as part of our best value planning framework assessment. See Appendix C - 'Options Deliverability' section. Delivery risk was calculated for the four plans taken forward to best value framework assessment using the following factors: · Delivery risk index: An index calculated by counting the number of schemes within each portfolio where delivery date matches earliest possible start date, and multiplying by the scheme WAFU. · Number of schemes likely to be subject to Direct Procurement for Customers (DPC) · Number of schemes likely to require Development Consent Orders (DCO)	Yes	Revised draft WRMP24 Supply side options development technical supporting document, Section 6 Revised draft WRMP24 Decision making technical supporting document, Appendix C
17	Environment Agency	**Recommendation 2.3** The company has submitted several schemes to be considered for acceleration in the remainder of AMP7. An announcement on the outcome of this acceleration process is expected in March. The company should ensure its plan takes account of any decisions on its scheme acceleration proposals where applicable.	We have included an additional 60,000 smart meters installed by 2024/25 as part of the Accelerated Infrastructure Delivery (AID) early AMP8 funding in our baseline demand forecast. We estimate that this accelerated installation will save an additional 0.9Ml/d a day (for these 60K properties; equivalent to 0.3Ml/d for behaviour change, 0.4Mld for plumbing loss reduction and 0.2Ml/d for cspl). These savings have been included in our base-line forecast and are aligned with our revised assessments for smart meter savings implying an overall difference of >0.1l/p/d in PCC by 2024/25. Our bid for Advanced Infrastructure Delivery funding for two key elements of the Colchester reuse scheme was approved. This will enable earlier delivery of the overall project. The two elements that are to be progressed though this mechanism are; A pilot plant or 'Demonstration Centre' and the transfer pipeline to take water from the Water Recycling Centre to Ardleigh reservoir. Water from the Centre can also be utilised to provide a WAFU benefit during its demonstration phase. By using this for internal processes that currently use a potable supply we can offset at least 0.5 Ml/d of demand in our Essex South WRZ. The transfer pipeline will provide part of an emergency drought solution during the construction phase of the main Advanced Water Recycling plant. Once in place, we could install temporary treatment at Colchester WRC and use the transfer pipeline to move resource to the reservoir, if it were required.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 4 and Section 5 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6 Revised draft WRMP24 Supply-side option development technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			In our modelling we have not constrained the supply-side options by making the Colchester water reuse option (part of the AID early funding) 'must do', however it is selected in our best value plan aligning with the AID programme.		
18	Environment Agency	**Recommendation 3.1** The company has identified the need to develop new supply schemes at pace or it risks failing to meet demand and support growth and deliver its statutory environmental obligations. The company has also identified several scenarios where it could require additional or alternative supply options, for example if demand is higher than forecast or one of the preferred supply options cannot be delivered. Given the risks in the company's preferred plan, and the likely need for additional options, the EA is concerned about the lack of progress in developing alternative supply schemes and the limited details provided in the plan. The company should work with WRE, other regional groups and neighbouring water companies to bring forward existing, new, and alternative options where these form part of a best value plan, or are needed as alternatives to manage risks in its preferred programme, so they are 'shovel ready' as soon as possible.	We engage with WRE, other regional groups, neighbouring water companies and All Company Working Groups on a regular basis, allowing us to progress our knowledge of the supply-side options in preferred plan, as well as its alternatives. We are also continuing engagement with our regulators on these options. In our AMP8 Adaptive Planning programme we want to explore more innovative options that could be delivered earlier. We are very keen to investigate options such as Managed Aquifer Recharge from reuse sources and Nature Based reuse solutions. We are already exploring the idea that simplified, less technology based solutions with less 'hard engineering' could be delivered sooner. We want to work closely with the Environment Agency on such schemes to challenge planning, monitoring and permitting requirements to expedite delivery. We will also be working on the mitigations for the implementation of desalination. We are already exploring potential partnerships that could aid delivery from a cost and timeline perspective and we will be continuing this work at pace.	No	N/A
19	Environment Agency	**Recommendation 3.1** The company identifies that desalination is the most likely alternative option if the Fens reservoir cannot be delivered, but the plan lacks detail and specific proposals of when, where, and how big the option(s) will be. There is a need to set out detailed proposals for feasible alternative options(s) to the Fens and Lincolnshire reservoirs should they not progress and confirm which option(s) are most likely to be progressed as alternatives and how these can help deliver a best value outcome for customers.	Our adaptive planning assessment shows which options would need to change to accommodate late delivery of the SRO options. We have carried out sensitivity tests which indicate that if the reservoirs weren't available, the difference would need to be made up by desalination options.	Yes	Revised draft WRMP24 Decision making technical supporting document, Sections 7 and 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
20	Environment Agency	**Recommendation 3.1** The draft plan does not set out if transfers from outside the region, for example from Water Resources South East (WRSE), could be a feasible alternative to proposed supply schemes, both as a short-term measure and as a longer-term strategic solution. AWS should explore with WRSE, and other regional groups, if transfers can form part of the best value, or alternative programme(s). This should include both short-term and long-term options.	For the revised draft WRMP we have modelled a series of potential transfers from/to the other regional groups. These are theoretical options to understand how our plan could adapt if one of the regional groups in subsequent planning rounds developed an option which could be shared between regions. This work is a repeat of the Regional Reconciliation 3 process, which seeks to ensure alignment between the five regional planning groups, in particular around the timing and selection of transfer options. This modelling provides a understanding at water company level. All imports and exports are modelled as starting from 2040. For import scenarios of 50Ml/d the capacity of desalination decreases proportionally to the import. The larger 100Ml/d imports create a surplus as the resulting capacity of new resource is greater than required in our preferred most likely scenario. We have modelled a 45Ml/d transfer from WRSE which is a reverse trade where we reduce our export to Affinity Water from our Grafham Water treatment works; in this scenario the plan adjusts by decreasing the desalination capacity but also increasing the capacity of water reuse. If we include an export to one of the regional groups this increases the capacity of desalination within the plan to match the export volume.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 7
21	Environment Agency	**Recommendation 3.2** The plan does not clearly set out what actions the company will take to protect the environment and public water supply should the preferred programme of demand management and supply options fail to be delivered. The company needs to include its most likely alternative plan, in the main report, demonstrating how it will maintain supplies without putting the environment at risk if assumed supply and demand forecasts do not materialise. The company has undertaken testing of its plans to future uncertainty, an adaptive planning assessment and identifies several scenarios where it could require additional or alternative supply options, for example if demand is higher than forecast. These assessments are welcomed, however in the main report there is a lack of a single alternative pathway or plan which is easy for customers and stakeholders to understand.	We have set out adaptive planning pathways describing the alternative approaches we would take in the event of the preferred option delivery and timings not being achieved as part of the revised draft WRMP24 Decision Making technical supporting document. This describes the actions we would take in the following scenarios: - Fens reservoir later than planned. We would bring forward our Bacton Desalination option which will be designed in AMP8. - Lincolnshire reservoirs delivered later than planned. We would need to adjust our timing to deliver Environmental Destination and explore enhanced demand management options. -Late delivery of the Ruthamford South to Suffolk West and Cambs (via Cambridge Water) interconnector. We would require an adjustment to licence caps timings, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI. We would also explore the possibility of enhanced demand management.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10 Revised draft WRMP24 Main Report, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			-Late delivery of interconnectors to Norfolk. We would require an adjustment to the timings of our licence capping, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI. We would also explore the possibility of enhanced demand management. - Marham abstraction is deemed infeasible. We would bring forward the Bacton Desalination option. This would also require an adjustment to the timings of our licence capping, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI. We would also explore the possibility of enhanced demand management. - Suffolk West and Cambs groundwater is deemed infeasible. We would require an adjustment to the timings of our licence capping, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI. We would also explore the possibility of enhanced demand management. - Demand management is less effective. We would bring forward desalination options, and look to adjust the timings of our licence capping, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI.		
22	Environment Agency	**Recommendation 3.2** Given the level of risk in the company's preferred programme, it is vital that the company works with neighbouring water companies, WRE and other regional groups to develop alternative supply options. The company should be progressing feasibility work now on potential alternative supply-side options so that they are ready to be implemented if the demand-side options fail to deliver expected savings or preferred supply options cannot be progressed.	We continue to work with our neighbouring companies through the region planning. As part of our adaptive planning we will start development and design of the Bacton desalination in AMP8 to enable us to switch earlier in our plan if required, as part of one of the adaptive pathways.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10 Revised draft WRMP24 Decision making technical supporting document, Section 6
23	Environment Agency	**Recommendation 3.2** A trigger point must be included early in AMP8 to review performance against forecasts. If there is an increasing risk of the company not being able to meet its statutory environmental obligations (for example causing deterioration the status of waterbodies) or risks to the security of supplies to customers, it should decide to move to an alternative programme and/or options.	We have set out a series of adaptive pathways which describe our actions in the event of changes to our preferred programme due to delays in options, options becoming infeasible and demand management not providing expected benefits. This includes a summary of risk mitigation actions, monitoring points, decision points and trigger points.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
24	Environment Agency	**Recommendation 3.2** The adaptive scenario must not rely on successful application of Regulation 19 due to significant risk to the environment and customers from abortive investment (in the preferred plan) and likely having to suffer lower levels of service.	We have set out a series of adaptive pathways which describe our actions in the event of changes to our preferred programme due to delays in options, options becoming infeasible and demand management not providing expected benefits. This particularly applies if AMP8 schemes such as the Ruthamford South to Suffolk West and Cambs transfer or interconnectors to Norfolk were to be delayed, or if the Marham Abstraction, and Suffolk West and Cambs groundwater options were to be deemed infeasible, or if our demand management strategy was less successful than planned. We have sought to avoid the use of Regulation 19/OPI where possible in determining our adaptive pathways. We also note that it is not proven that changes in the amount of water abstracted necessarily causes deterioration or presents a risk of it, nor does it automatically give rise to OPI.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10
25	Environment Agency	**Recommendation 4.1** Additional sustainability changes could be required to some of the company's abstraction licences to deliver the requirements of the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations). This risk and uncertainty should be incorporated into the plan.	We have assumed worst case scenario for Kirby Cane/Thorpe/Postwick.	Yes	Revised draft Supply forecast technical supporting document, Section 5
26	Environment Agency	**Recommendation 4.1** Any licence changes required to deliver environmental obligations at protected sites must be included in the plan and options identified to meet the requirements must be delivered as soon as practicable. The company need to include the abstraction reductions needed to meet the requirements of protected sites and plan for these changes to be made as soon as practicable once they are confirmed. As part of this, they should ensure it has included options to provide replacement water once the sustainability changes are confirmed and for these to be progressed for the earliest feasible delivery date. Uncertainty associated with this should be addressed by means of scenarios and adaptive solutions, as needed.	Our initial most likely scenario incorporates licence cap for time limited licences reduced to average recent actual by 2030, all other permanent licences by 2036. In response to stakeholder feedback we have developed a bespoke scenario to bring forward permanent licence caps such that all available resource is fully utilised. Starting with scenario 4 we identified surplus resource that could be fully utilised by bringing forward some of the permanent licence caps without triggering the need to develop additional schemes (such as desalination) at the start of the plan. We have prioritised environmental destination reductions over drought resilience, by moved the drought in Ruthamford back to 2040. This creates a 15Ml/d surplus in 2036 which can be used to deliver environmental destination reduction in our most sensitive catchments.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
27	Environment Agency	**Recommendation 5.1** The company should do more to reduce leakage as its current ambition does not meet government expectations or align with the industry wide commitment to reduce leakage by 50% by 2050. This is disappointing in the context of the water resource pressures both the region and nation face. The company should reduce leakage further particularly where there is a risk of environmental deterioration. The EA expect to see additional reductions in leakage in the plan.	Leakage is a particular concern for our customers, who see it as wasteful and a sign that we are not doing enough to conserve water and invest in infrastructure. This can be a strong disincentive for customers to adopt more water efficient behaviours. Customers also often associate leaks with service interruptions. However, our leakage performance is currently industry leading. We have cut leakage by more than a third since privatisation in 1989 and it is now at very low levels; around half the national average based on the amount of water lost per kilometre of main. We are now taking significant steps towards our AMP7 target. We have considered the wider national context and consultation responses for our revised draft WRMP24. Consequently, we now intend to reduce overall leakage to 118.49Ml/d (significantly below our initial draft WRMP24 plan of 145.7 Ml/d) by the end of the WRMP24 planning period (2049/50). This would be a reduction of 45.71Ml/d from our 2024/25 value of 164.2Ml/d. This would represent a reduction of 72.51Ml/d or a 38% reduction from our 2017/18 base-line of 191.3Ml/d, (as opposed to the 24% included in the draft WRMP24). This is a much more ambitious target for the revised draft WRMP24. Whilst developing our revised draft WRMP24 plan we have reviewed the PIC (Public Interest Commitment) and NIC (National Infrastructure Commission) targets, our current position as a company (in relation to other water companies) and future potential outcomes. Costs and benefits have been generated for a number of scenarios achieving alternate leakage reductions. In order to meet leakage aspirations, we have reviewed all feasible demand management options for the WRMP24 planning period. We have also assessed leakage reduction in the context of our current 'frontier' leakage position in the industry, potential cost and bill impacts. Considering the wider context, national leakage target, and consultation responses, we now intend to reduce overall leakage by 38%, which represents the maximum leakage reduction that we believe is feasible with current technology. However, this augmented plan does come at a very significant cost in the longer term (>£4 billion). We have, therefore, sequenced the plan such that the vast majority of the cost should impact AMP9 and beyond (post 2030). As we review the plan for WRMP29 we will investigate how technological improvement can mitigate these costs. We consider this revised position indicates our level of ambition in making a fair and equitable contribution to the overall national leakage target.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			We have assessed a 50% reduction in leakage (achieving a leakage level of 90Ml/d) as being unfeasible requiring significant mains replacement, at a cost in excess £20 billion. We currently consider this to be an unrealistic burden upon our customers and have, consequently settled upon a leakage reduction of approximately 38%, which allows us to more than meet our NIC and PIC targets. To achieve our ambition we will need to use innovative techniques, as well as tried and tested methods. Smart metering is currently offering an opportunity for a step change in detecting customer supply pipe (external) and plumbing loss (internal) leaks by improving our understanding of continuous flows in customer properties (usually indicating a leak), as well as increasing our overall understanding of our network. Customer supply pipe leakage currently accounts for 23% of total leakage. As smart meters are introduced, we expect cspl to be reduced by 70%. We will continue to actively explore how the use of state-of-the-art technology can help us to achieve further leakage reductions. This is why the concept of 'zero leakage and bursts' is one of the seven goals of our Shop Window initiative. We also continue to actively trial technologies such as thermal imaging drones to detect leaking pipes and the use of satellite imagery to identify leakage. We continue to explore, for example through our research on smart networks as part of Ofwat's Innovation Fund and through our engagement with fellow water companies and smart water network pioneers such as Vitens in the Netherlands and Global Omnium in Valencia.		
28	Environment Agency	**Recommendation 5.1** The company state "we are currently a 'frontier' company" however, the proposed leakage reduction in the plan would result in the company losing its industry leading status, with most companies planning to have lower leakage per person and per property values by 2050. Neighbouring companies in WRE claim to also be near the frontier of leakage management but commit to a higher level of leakage reduction. This means within WRE there are significant differences in individual company ambitions for future reductions and no single regional target for leakage. The company should provide detailed evidence that the national target will still be met if it selects a reduction of less than 50%, and justify its ambition in comparison to other companies in WRE who claim also to be near the frontier of leakage management, but commit to a higher level of leakage reduction.	As part of our revised draft WRMP24, and in the light of our consultation, we have reviewed our leakage reduction programme. We have, consequently, included our maximum feasible leakage reduction programme, achieving a reduction of 38% (from the 2017/18 base-line) by 2050. This reduction is now more in alignment with the anticipated reductions form other water companies. Additionally. it should be noted that if the 50% reduction for leakage is applied as a set of national attainment curves, Anglian Water will be below these targets by 2030 and very significantly below, by 2050. We have discussed leakage targets with our neighbouring companies in WRE. However, it is not up to individual companies to assess the relevant contribution of other companies; this is a matter for both the regulators and respective companies to evaluate.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
29	Environment Agency	**Recommendation 5.1** The company tests alternative leakage reduction scenarios including one that would meet the 50% reduction target by 2050, but reductions are not believed to be cost-effective, mostly due the cost of large-scale mains replacement. AWS should consider including some mains replacement as a preferred option to reduce leakage and set out the costs and uncertainties associated with the savings that may be gained. This should include results from the company's research on background leakage to support with targeting mains replacement and to inform further assessment of mains replacement rates, costs, and leakage reduction benefits.	As part of our preferred plan we have now included a significant programme of mains replacement in order to achieve our maximum feasible level of leakage reduction. We have currently estimated that 8,654km of mains replacement will be required to achieve our ambition for a 38% leakage reduction, at a significant cost of over £4 billion. We understand that this is a considerable commitment, but have weighted the programme beyond AMP8, such that further investment might be mitigated by new technologies as we develop the WRMP29 plan. With our preferred plan our intention is to show the scale of our ambition as a leader in leakage reduction and make a fair and equitable contribution to the overall national leakage target, such that the preferred plan provides us with an ambitious, but achievable goal, notwithstanding that this will burden our customers with significant additional costs in the long term. However, we will continue to actively explore how the use of state-of-the-art technology can help us to achieve further leakage reductions, and mitigate the future costs that might be associated with this level of leakage reduction.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8
30	Environment Agency	**Recommendation 5.1** Options to reduce non-household demand (including leakage) should be included in the plan and, once this is complete, explain how this contributes to an improved leakage ambition.	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50. Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
31	Environment Agency	**Recommendation 5.1** The company should further consider how Water UK's Leakage Routemap to 2050 can help the company to identify key activities and interventions to reduce leakage further, for example an adaptive pathway process.	Whilst developing our demand management strategy and leakage reduction programme in particular we have been mindful of a number of factors including: - EA/Defra/National Framework targets and the WUK Leakage 2050 Routemap. - Our current frontier position with regard to leakage (and the fact that we will have exhausted the more cost effective options by 2025). - Our obligation to contribute to a 50% leakage reduction nationally. After consideration we have included a 38% reduction in leakage from the 2017/18 base-line (noting that if the 50% national target is treated as an attainment curve for leakage per property and leakage per km main, we will be significantly below this line). This reduction has been modelled using known leakage activities, such as, targeted investigation, pressure management and mains replacement. However we are keen to investigate innovative leakage reduction techniques to identify leakage and assist with its mitigation (remoter sensing, robotic repair, adoption of new materials).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8
32	Environment Agency	**Recommendation 5.1** The company should consider and appraise further leakage management beyond that required to meet the 50% commitment and/or government's policy expectations as an option in the option appraisal process.	As part of our 'Long Term Delivery Strategy' we are investigating all potential future technologies that might help us achieve lower leakage levels. However, in planning our revised draft WRMP, we have had to consider out current frontier position with regard to leakage and the significant cost we currently associate with achieving very low levels of leakage. As stated in our plan, we have been mindful of our consultation responses and the 50% leakage target and now plan to reduce leakage to what we currently consider is our lowest achievable leakage level of 38% (118Ml/d). This currently involves a significant amount of mains replacement at very significant cost (>£4billion). Our WRMP24 programme indicates the level of importance we place upon leakage reduction. We will, however, investigate innovative technologies to help facilitate this and mitigate the currently estimated costs, as we plan beyond AMP8 (WRMP29 etc). We consider that the National Framework target should be viewed as a National target and should be applied, whilst considering the current position of water companies, such that costs are fairly apportioned and customers are not penalised by trying to achieve exceedingly expensive reductions (in comparison with other options; noting that we currently estimate a 50% leakage reduction to cost £20billion).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
33	Environment Agency	**Recommendation 5.2** The company's forecast baseline leakage does not remain static throughout the planning period, and this is not in line with the WRPG. Baseline leakage increases by 3.4Ml/d and nationally Anglian Water is the only company to forecast an increase. The EA note the justification is to "reflect changing levels of customer supply pipe leakage due to the increase in properties caused by growth, an increase of 528K properties." However, it is unclear why the company forecast an increase in baseline leakage. New properties have low levels of leakage due to new pipes and fittings and a lower level of consumption overall. The company should reassess its approach to forecasting baseline leakage and provide further detail and provide further detail and justification of why it forecasts an increase in baseline leakage and is the only company to do so nationally. This should include the data, evidence and assumptions of why it expects an increase in new properties to increase total leakage.	For the revised draft WRMP24 forecast we have re-appraised the base-line leakage forecast. Our new leakage forecast varies slightly over the WRMP24 from an assessment of 2024/25 of 164.2Ml/d to 164.0Ml/d. This slight increase is the net effect of cpsl increase due to substantial numbers (c500k) new properties, and the decrease in cpsl from AMP7-installed smart meters. We argue that these factors more appropriately represent the future forecast base-line for leakage, as opposed to an unrealistic static leakage projection; in particular, and based on cpsl breakout rates, it is untenable to expect no cpsl from such large numbers of new properties up to 2050.	No	Revised draft Demand Forecast technical supporting document, Section 8
34	Environment Agency	**Recommendation 6.1** The company's draft plan currently includes a substantial (4.1%) increase in non-household consumption from 2019/20 to 2037/38. The company state that they are currently developing options to reduce non-household demand and have, therefore not assumed any reductions in forecast demand for the draft plan. The EA expect all companies to reduce non-household consumption and contribute to a 9% reduction by 2037/38 as part of the Environment Act target or provide robust justification of why this not possible. The company needs to significantly improve its plans to reduce non-household consumption by 2037/38 and demonstrate how this contributes to the water demand target. This should be completed by	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50 (approximately 10Ml/d per 5 year AMP period). Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		providing specific plans, in collaboration with retailers, to reduce non-household consumption and quantify the savings and timescales for its options in the plan.	In total, these options help us achieve approximately 8% reductions by 2037/28 and 15% by 2049/50, but these reductions can only be achieved relative to the non-household demand position (including growth). We do not, therefore, believe that, achieving the absolute levels of non-household demand reduction, from the 2019/20 base-line, should be included in the revised draft WRMP24 plan, as this represents a degree of uncertainty with respect to the implementation of the newly developed options, which would not be prudent. As we prepare for WRMP29, we will trial options and their implementation, and develop options further for our WRMP29 plan, as we gain more experience. On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). Note this demand is not included in our potable water output or DI and, therefore, is considered an export and not part of our current non-household demand target assessment.		
35	Environment Agency	**Recommendation 6.1** The rollout of smart metering for non-households should be clarified, and further information provided.	We are currently progressing our roll-out of smart meters for both our household and non-household customers area by area, and will achieve full smart meter roll-out by 2029/30. Note that we currently have over 500K household smart meters and 16K non-household smart meters installed (2022/23), as we progress our geographic roll-out. Also note that 99.5% of non-household customers are metered.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 6 and 9
36	Environment Agency	**Recommendation 6.2** The company has engaged with non-household retailers as part of the demand management option development process. However, it is unclear if and how this engagement has helped to develop and produce future non-household demand forecasts. The company should set out if and how its consultation and engagement with retailers of water to non-household customers has helped to develop and produce its non household demand forecasts.	As part of the revised draft WRMP24 demand management option development process, and in conjunction with our WRE partners, we have engaged with our regional Retailers and business customers, in order to gauge opinion on further water efficiency measures for the business sector. This recent engagement (in association with WRE and 'Blue Marble') has been conducted to understand the retailer perspective regarding the promotion of water efficiency; to develop and refine propositions and understand and overcome barriers; and to explore these propositions and how they might be implemented with retailers and non-household customers. Based upon this we have developed a number of options that we wish to implement in co-ordination with our Retail partners. These options have been considered in partnership with other wholesalers in the WRE region. We fully understand that Retailers are best placed to delivery these options, but also realise, that as the wholesaler, we are in a position to design option and gain funding through the WRMP enhancement programme.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
37	Environment Agency	**Recommendation 7.1** The company forecast a reduction in dry year annual average PCC to 111.6 l/h/d by 2049/50. This does not fully deliver the government expectation of 110 litres/person/day by 2050. It should plan for Government expectations of PCC reaching 110 l/h/d (in a dry year) by 2050 and include the additional options it needs to reach this ambition.	We have now revised our forecast for household demand and per capita consumption for our revised draft WRMP24. This has included reassessments for smart meter savings, Covid19 pandemic impacts and the impacts of government led interventions, such that, DYAA PCC is now forecast to be 109.74l/h/d, meeting the stated target. Note that significant uncertainty is associated with these forecasts, due to their reliance on demographic, behavioural and attitudinal changes over the long term. We have, consequently, instituted our 'Demand management monitoring framework' to validate our demand management strategy and pro-actively adapt as required.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 7
38	Environment Agency	**Recommendation 7.1** The company must ensure the data tables and narrative are clearly aligned to give confidence that the company is planning for demand in a dry year.	The revised draft WRMP24 reports and tables are fully aligned, stating clearly where values reflect Dry Year Annual Average, Critical Period, or Normal Year as required.	Yes	All revised draft WRMP24 documentation
39	Environment Agency	**Recommendation 7.2** The company has included the impacts of government interventions in its baseline demand forecast, this is not in line with the latest (Version 12 updated March 2023) WRPG. The company should remove the impacts of government interventions in its baseline demand forecast.	For our revised draft WRMP24 plan we have only included impacts from 'government led interventions' in our preferred plan and not in our base-line forecast, as directed in the WRPG (March 2023).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 10 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 12
40	Environment Agency	**Recommendation 8.1** The EA is aware of some potentially significant but uncertain short-term new demands for water, including to help deliver low carbon forms of energy and carbon capture and storage at the Humber net zero cluster site. This emerging technology may require additional abstraction, which may not be either physically available and/or licensable locally and water users will look to the company to enable growth and delivery of net zero objectives. This represents a significant risk and could result in conflicting demands for limited resources. The company states it is aware of two major potential non household customers looking to transition from private to public water supplies and that this has been factored into the nonhousehold forecast. If any further such requests are made, these will be assessed the implications of these for the plan.	Whilst developing our WRMP24 non-household demand forecast, we have been liaising closely with key industries and stakeholders, with regard to Hydrogen production and carbon capture, mainly with respect to the South Humber bank industrial cluster and in Hartlepool. Through our draft WRMP24 consultation process these companies have given an indication of the volumes of water (mainly non-potable) that potentially will be required in the near future and we have, consequently, included an allowance for an increasing requirement over the next AMP and beyond (up to 60Ml/d), for both potable and non-potable water. We will continue to liaise with our industrial partners on how these requirements can best be fulfilled, however, this would seem to be in contradiction to our required targets for non-household demand reduction.	Yes	Revised draft Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		The company should work with WRE, WReN, other relevant water companies and sectors to incorporate any confirmed additional demand in its plan to demonstrate that it will support and enable growth in the region and delivery of net zero and environmental obligations, as well as provide sufficient water supplies across the region. As part of this, it should assess the implications of higher localised growth around the Humber cluster.			Revised draft WRMP24 Demand forecast technical supporting document, Section 7
41	Environment Agency	The company should develop an adaptive pathway to ensure options required to support growth are ready to be implemented in timely fashion, for example Mablethorpe desalination.	We have developed an adaptive pathway which describes the action we would take if our Demand Management strategy were to be less effective than planned in managing growth. This would include bringing forward development of the Bacton desalination option. Our demand forecast also includes 60Ml/d of forecast non-potable demand for future hydrogen production and carbon capture industrial development in the South Humber Bank WRZ. This demand is directly linked to the South Humber Bank desalination option and does not influence the rest of the supply system.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10
42	Environment Agency	**Recommendation 9.1** Although the company has presented information on its carbon emissions associated with future supply and demand options, it has not completed an assessment of greenhouse gas emissions for its current operations. The company must provide a description of greenhouse gas emissions for its current operations.	We report on our operational greenhouse gas emissions in detail on an annual basis as part of our Annual Integrated Report. The most recent Annual Integrated Report is available here: https://www.anglianwater.co.uk/siteassets/household/about-us/air-2023.pdf. See page 81 for a summary table of our emissions, and pages 74 to 82 for further details of our climate strategy, climate risk management approach and climate-related metrics and targets. A link to this information has been included in the revised draft WRMP24 Main Report.	Yes	Annual Integrated Report, 2023 Revised draft WRMP24 Main Report, Section 2
43	Environment Agency	**Improvement 1.1** The company recently ran a public (non-statutory) phase one consultation on both reservoir SROs to gather feedback and information on early proposals to inform ongoing design development. Although the SRO and WRMP processes are separate there is significant overlap, and it is unclear how the feedback from the SRO consultations will inform the development of the plan and the options within it. The company should consider how to incorporate consultation feedback on its reservoir SROs into the plan. This should include how the phase two consultation (planned in 2024) will inform the development of the final plan.	The SRO and WRMP processes are working together to respond to the relevant consultation processes. We have not incorporated consultation feedback from the informal SRO consultation into our WRMP Statement of Response, as these are two standalone consultation processes each with specific objectives. However, the SRO consultation has informed the development of the SRO options in the revised draft WRMP e.g. regarding sources of water.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
44	Environment Agency	**Improvement 2.1** The company does not include planned outage in its total outage allowance and instead has adopted the 95th percentile of (unplanned) outage as a precautionary approach. Whilst there is some justification provided, there is insufficient detail and evidence to support the decision made. The EA has concerns that delaying planned outage is not always operationally feasible. The company may not recognise that they are in a 1:500 drought scenario which could result in planned works being delayed to the point of failure leading to a rise in unplanned outage. The company has not set out why several water resource zones have an outage allowance of 0Ml/d; how it plans to improve its data collation, assessment, and estimation of outage or if it is considering options to reduce outage. The company has presented information and evidence about its outage allowance to the EA outside of the plan, but this is currently not included in the draft plan. The company should provide further detail and evidence to justify its decision to remove planned outage. It should also demonstrate that delaying planned outage is operationally feasible, will not risk further asset failure and does not leave customer supplies at risk. This explanation should set out why several water resource zones have an outage allowance of 0; how the company plans to improve its data collation, assessment, and estimation of outage and if the company are considering options to reduce outage and if so a description of each option.	We have addressed these points as part of the revised draft WRMP24.	Yes	Revised draft WRMP24 Planning factors supporting technical document, Section 3
45	Environment Agency	**Improvement 2.2** The company has set out some information on its headroom risk glidepaths and has opted to characterise its water resource zones to a specific risk profile. However, there is a lack of evidence and justification behind the chosen approach in the draft plan. The company has presented further information about its headroom forecast to the EA outside of the plan, but this is currently not included in the draft plan. The company should set out further information on how it has selected its target headroom profile including how and why the approach was selected and the data, evidence and assumptions used to forecast headroom.	We have addressed these points as part of the revised draft WR<P24, which includes commentary on headroom risk glidepaths and details of the headroom components and their source data.	Yes	Revised draft Planning factors technical supporting document, Section 2
46	Environment Agency	**Improvement 2.3** The company has provided a forecast of treatment works losses and operational use, however there is no explanation in the draft plan of how this was calculated. It needs to set out how treatment works losses and operational was forecast.	Process losses are included within the modelling simulation to avoid over- and underestimation of deployable output. Additional text covering this query has included for revised draft WRMP24.	Yes	Revised draft Supply forecast technical supporting document, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
47	Environment Agency	**Improvement 3.1** Section 2 of the Environmental Report sets out the company's Best Value Plan decision making criteria and strategy but does not specifically set out the content or the objectives of the plan itself. Section 2 of the Environmental Report should be updated to reflect the objectives of the plan.	In response to the consultation feedback to include the objectives of the plan, these have now been included for the revised draft WRMP24.	Yes	Revised draft WRMP24 Environmental Report, Section 2
48	Environment Agency	**Improvement 3.2** The Scoping Report Consultation Log document (Appendix B) details the consultation comments on the SEA Scoping Report. However, some of the company's responses are unclear on exactly how the consultation comments were considered and which specific parts of the Environmental Report were amended. E.g. "this will be considered within the main environmental report". The Scoping Report Consultation Log document (Appendix) should be updated to clearly signpost the changes that have been made to the Environmental Report based on the Scoping Report consultation.	We have updated the Environmental Scoping Report Consultation log to include signposts as to where a comment has influenced change.	Yes	Revised draft WRMP24 Environmental Report, Appendix B
49	Environment Agency	**Improvement 3.3** Section 4 of the Environmental Report states a zone of influence is applied for each options level assessment, however these are not clearly set out in the Environmental Report. Section 4.5 states a buffer around the plan area is included so that additional receptors are captured in the assessment. The buffers are applied based on the plan options however, these are not set out within the assessment. The Environmental Report should clearly set out the study area and associated buffers.	This detail has been included in the revised draft WRMP24.	Yes	Revised draft WRMP24 Environmental Report, Appendix B
50	Environment Agency	**Improvement 3.4** The PPP review does not include neighbouring WRMPs and River Restoration and Water Level Management Plans, drought plans and SROs. As other company WRMPs are not identified in the PPP, it is unclear if these are considered within the inter-plan effect assessment. The PPP review should be updated to set out how neighbouring WRMPs influence the company's plan. The review should also be updated to include neighbouring SROs and drought plans. The company should provide further detail on how it considers other relevant water company plans in the inter-plan assessment.	We have updated the PPP accordingly to include neighbouring WRMPs, Drought Plans and SROs. In terms of River Restoration and Water Level Management Plans, these have not been included at the plan scale (thus not in the PPP) however, where applicable in the HRA assessment, River Restoration and Water Level Management Plans have been considered. The revised draft WRMP24 Environmental Report includes consideration of other water company WRMP24 in its updated cumulative effects assessment, this is based on the content of each of the other companies draft WRMP24 as these are the only public domain documents available to access for this updated aspect of the SEA. Within the HRA and WFD assessments, other water company plans have been identified where there is the potential for inter-plan effects.	Yes	Revised draft WRMP24 Environmental Report, Section 8 Revised draft WRMP24 WFD Sub-report, Section 5 Revised draft WRMP24 HRA Sub-report, Section 22

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
51	Environment Agency	**Improvement 3.5** Section 4 provides an overview of the methodology used for the high-level screening and options level assessment. However, the description does not provide thresholds for determining effect characteristics. Similarly, the zone of influence for each topic is not defined, it is therefore difficult to determine whether these are appropriate. Uncertainties and limitations of the assessment are not provided in the report. The Environmental Report should include a clear and justified statement regarding its temporal scope. The temporal scope should reflect the full duration of the WRMP period to 2050.	The thresholds for determining effect characteristics are presented in the revised draft WRMP24, as well as the zone of influence for each topic. Uncertainties and limitations are highlighted, where appropriate, within the environmental assessment sub-reports, which feed into the SEA. Further detail has also been added to explain the temporal scale of effects that were considered, based on whether the effect would be permanent or temporary, and the duration of the effect.	Yes	Revised draft WRMP24 Environmental Report, Section 4 Revised draft WRMP24 Environmental Report, Appendix B
52	Environment Agency	**Improvement 3.6** Section 6 considers plan level alternatives however it is unclear how the preferred options are selected. Appendix E sets out all options assessed, so it is assumed that alternative options are considered. However, there is no narrative on options not taken forward and the methodology for selecting these. The Environmental Report should provide a clear justification on how the preferred options are derived and clearly set out how the SEA and assessment of alternatives has influenced the plan.	We have updated the revised draft Environmental Report to reflect the full assessment of the three alternative plans (A, C and D), as well as the preferred plan (Plan B). There is also further detail on how the preferred options were derived and how the SEA and alternative plans have influenced the plan.	Yes	Revised draft WRMP24 Environmental Report, Sections 5, 6 and 7
53	Environment Agency	**Improvement I3.7** Appendix E sets out mitigation measures, however, it is unclear whether the main Environmental Report includes the residual effects or pre-mitigated effects. This is pertinent to understand as there are some major and moderate adverse effects associated with the preferred options and in some instances, mitigation hasn't reduced the pre-mitigated effects. Most adverse effects are associated with the proximity to UK Biodiversity Action Plan priority habitats and SSSIs and potential effects on ground or surface water bodies.	The revised draft Environmental Report presents residual effects. Since the draft WRMP24, there have been changes to the four plans, therefore, the assessments have been updated (also presenting residual effects).	Yes	Revised draft WRMP24 Environmental Report, Sections 6, 7 and 8
54	Environment Agency	**Improvement I3.7** Appendix E sets out the effect of each option and each of the SEA objectives is assessed with and without mitigation in place. However, it does not provide details on the characteristics of effect e.g. duration, spatial extent. Transboundary effects are not identified within the SEA assessment. Section 4.5 states that effects and potential impact pathways are considered for options both wholly and partially covered by the company's operating area, however, this is unclear within the assessment.	We are no longer presenting Appendix E as it was for the draft WRMP24; these assessments will now be shared as locked spreadsheets allowing easier navigation. Within the SEA, the characteristic of the effect has been identified; since the draft WRMP24, this has been made clearer within the SEA matrices presented in the spreadsheets. In addition, there is an assumption that no-transboundary effects will occur.	Yes	Revised draft WRMP24 Environmental Report, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		The assessment should define the characteristics of effect, for example duration, spatial extent. The Environment Report should confirm if there are any significant cross-boundary conflicts or issues that could affect the approval and adoption of the plan.			
55	Environment Agency	Although Section 8 provides an overview of the mitigation identified as part of the SEA processes, paragraph 8.1.2 is confusing, and it is unclear if Table 8.1 includes both embedded and additional mitigation measures. It is unclear how mitigation is secured or whether mitigation is achievable, effective, and deliverable. Some mitigation measures lack specific detail and lack information on how these will be secured (i.e. whether it will be managed via a Construction Environmental Management Plan). Some mitigation measures reduce the significance of the pre-mitigated effects, and it is difficult to determine whether mitigation measures are appropriate without knowing if all significant effects are identified. The company should update Table 8.1 and Paragraph 8.1. to clearly identify the embedded and additional mitigation; clarify if any additional mitigation would reduce the significance of effect and clarify how the mitigation will be secured and further developed.	Following the consultation feedback requesting clarity on the mitigation described in the Environmental Report, this has now been updated. As this is a strategic plan, the level of detail reflects this; the mitigation details identified across our environmental assessment work for options in our revised draft WRMP24 preferred plan will be carried forward into the implementation phase and developed further when at a project-level. It is also noted that details related to mitigation identified by the other environmental assessments can be located in the wider suite of sub-reports, for example within the HRA report.	Yes	Revised draft WRMP24 Environmental Report, Section 9
56	Environment Agency	**Improvement I3.9** Section 10.1 of the plan sets out some information about how the SEA and other environmental assessments has influenced the plan's development, however the information presented is high level. The Environmental Report does not set out how the SEA and other environmental assessments has influenced the development of the plan. The company should provide further detail to explain how the outcomes of the SEA influence the development of the plan.	In response to consultation feedback on the level of detail of how the SEA has influenced decision-making, further detail has been added on this process, for revised draft WRMP24.	Yes	Revised draft WRMP24 Environmental Report, Section 5 Revised draft WRMP24 Main report, Section 12 Revised draft WRMP24 Decision making technical supporting document, Section 4
57	Environment Agency	**Improvement I3.9** The company should consider including a separate section within the Environmental Report that sets out how the SEA has influenced the plan.	This has been included for revised draft WRMP24.	Yes	Revised draft WRMP24 Environmental Report, Section 5
58	Environment Agency	**Improvement I3.10** Table 9.1 sets out monitoring proposals, the proposed indicators, and associated timescales. However, some proposals are vague, and it is difficult to understand how the indicators are used for monitoring purposes. It is unclear who is responsible for undertaking monitoring. Appendix E sets out monitoring requirements, however it is difficult to understand how these link to Table 9.1. For example, the monitoring measure 'Monitoring	For revised draft WRMP24 we have clarified that Anglian Water will be completing the proposed monitoring. Additional details on monitoring and environmental data related to water bodies and protected sites are presented in the option specific HRA Appropriate Assessment and Level 2 WFD assessment chapters of the respective sub-reports.	Yes	Revised draft WRMP24 Environmental Report, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		river levels during construction' is included in Table 8.1 'Proposed Mitigation Measures', rather than Table 9.1 'Monitoring Proposals'. It would be clearer and easier to identify the monitoring requirements if they were under a separate heading in Appendix E. The company should ensure the measures outline the need for triggers and thresholds for remedial action and, for monitoring measures, a clear plan is set out including who is responsible, how these will be undertaken, what will be undertaken and when these will occur.			
59	Environment Agency	**Improvement I4.1** Section 4.6 of the main plan sets out the impact of climate change as a 6Ml/d reduction in water availability. However, it is unclear how this number was derived and it is not referenced in any other document.	The 6 Ml/d was developed from our water available for use calculations. We have made this clearer in our revised draft WRMP24.	Yes	Revised draft WRMP24 Our Water Resource Management Plan 2024
60	Environment Agency	**Improvement I4.1** Although the WRMP24 data tables show the impact in each water resource zone, the impact on each of these is not explained in the plan.	We have included a deployable output impact matrix in the revised draft WRMP24.	Yes	Revised Draft Supply forecast technical supporting document, Section 4
61	Environment Agency	**Improvement I4.1** The company has used one UKCP18 product (Regional Climate Models RCP8.5) in Aquator using the English and Welsh method to assess impact on a pre selected 1:200 and a 1:500-year drought event. It is unclear how it is known that the level of risk of these events under climate change is similar to the level of risk under baseline conditions. These events may no longer represent those severities.	Additional verification around extreme drought has been carried out using a secondary weather generator. Additional text covering this query has been included in the revised draft WRMP24.	Yes	Revised Draft Supply forecast technical supporting document, Section 6
62	Environment Agency	**Improvement I4.1** Section 7 of the Revised Draft Supply forecast appendix sets out that groundwater yields are based upon WRMP19 assessments and have not been updated for plan input data, or UKCP18 perturbations. Section 7.3 states that severe drought impacts are assumed to include any climate change effects however this assumption is not justified. The company should provide further clarity on impact assessment.	The total additional impact from climate change is less than 1 Ml/d by 2050. Additional text covering this query has been included within the Revised draft WRMP24.	Yes	Revised draft Supply forecast technical supporting document, Section 7
63	Environment Agency	**Improvement I4.1** AWS should consider more than one UKCP18 climate projection product into assessment, for instance, incorporate the Advanced Meteorology Explorer (AME) outputs, assuming these use a different set of projections than the UKCP18 Regional Climate Model outputs.	We have included 3 RCMs from RCP8.5, 2 of which feature in target headroom. The climate impacted AME outputs are not ready for inclusion in the revised draft WRMP24. It should be noted that the UKCP18 RCM outputs are the only outputs that are spatially coherent and suitable for use in hydrological modelling of typically large catchments.	Yes	Revised draft Supply forecast technical supporting document, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
64	Environment Agency	**Improvement I4.1** Consider impacts of climate change on groundwater yields.	The total additional impact from climate change is less than 1 Ml/d by 2050.	Yes	Revised draft Supply forecast technical supporting document, Section 7
65	Environment Agency	**Improvement I4.1** The company should consider robustness of using single events with return periods defined on baseline conditions.	Additional verification around extreme drought has been carried out using a secondary weather generator.	Yes	Revised draft Supply forecast technical supporting document, Section 6
66	Environment Agency	**Improvement I4.2** The company has not carried out a Baseline Vulnerability Assessment (BVA) or referenced a BVA from WRMP19 but has instead undertaken Tier 3 analysis. The guidance requires a BVA to be carried out where significant changes have occurred since the last plan, which can incorporate hydrology and licence changes, both have occurred for the company (Section 4.2 Main Report). The company should consider incorporating a BVA into its assessment	This Revised draft Supply forecast technical supporting document demonstrates that the impact of climate change by 2050, is dwarfed by the impact of the impact of licence changes and, to a lesser extent, the 1 in 500 year extreme drought. Climate change-led investment is inevitably going to be relatively low under the forecasted climate change impact of 20 Ml/d (in a 1 in 200 year drought) by 2050 across the Anglian region, compared to nearly 400 Ml/d of reduced deployable output as a result of licence changes. Nonetheless, we have completed an advanced level of analysis based on an excellent understanding of hydrological and water resources system vulnerability. As such we see no benefit in conducting a BVA.	No	Revised draft Supply forecast technical supporting document, Section 7
67	Environment Agency	**Improvement I4.2** The company should provide more detail of the AME projections and show range of the Regional Climate Model and AME projections against other UKCP18 products for contextualisation.	We have included 3 RCMs from RCP8.5, 2 of which feature in target headroom. The climate impacted AME outputs are not ready for inclusion in the WRMP.	Yes	Revised draft Supply forecast technical supporting document, Section 7
68	Environment Agency	**Improvement I4.3** It is unclear what modelling has been undertaken i.e. full stochastic perturbed data or just drought events. It is unclear which emissions scenario is used for the central estimate and why this has been chosen. The company should explain what climate change modelling has been carried out for the deployable output impact assessment and clarify which emissions scenario is used for the central estimate and why this has been chosen.	Modelling approach has been fully documented in the Revised Draft Supply forecast technical supporting document. Additional verification around extreme drought has been carried out using a secondary weather generator. We have included 3 RCMs from RCP8.5, 2 of which feature in target headroom; RCP8.5 was chosen to maximise the climate change signal over variability, but the results have been scaled to lower emissions scenarios (note that direct use of lower emissions scenarios was constrained by availability in UKCP18).	Yes	Revised draft Supply forecast technical supporting document, Sections 6 and 7
69	Environment Agency	**Improvement I4.4** The company has included some, but limited, information in its plan about the resilience of its preferred supply options to climate change. Some reference is made in the Environmental Report and in the main report the company states a site assessment was undertaken for the reservoir SROs which considered resilience to climate change in the analysis. However overall, there is a lack of detailed information about the resilience of the preferred supply options to climate change.	Enhanced detail has been included for revised draft WRMP24.. The impacts of climate change (median: core plan scenario), including Ofwat's reference low and high impact scenarios, are modelled for supply options to understand the range of potential benefit (in terms of deployable output).	Yes	Revised draft WRMP24 Supply side options development technical supporting document, Section 5

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		The company should provide detail on the resilience of its preferred supply options to climate change. For the reservoir SROs this should include how climate change impacts the availability of water to fill them under future climate change scenarios and the ability of the options to perform as designed.			Revised draft WRMP24 Supply forecast technical supporting document, Section 10
70	Environment Agency	**Improvement I5.1** The drought of 2022 challenged the company and was one of the most significant droughts of recent times. The drought saw very high demands and highlighted some areas where resilience needs to be improved. The company should include an appendix to consider its experiences from 2018 and 2022 and refer to the updated water resources planning guideline for a list of topics to consider.	We have included our experiences of the 2022 drought in the revised draft WRMP24 Main report.	Yes	Revised draft WRMP24 Main report, Section 14
71	Environment Agency	**Improvement I5.1** The company should set out any lessons identified and actions in response to these. This should include changes made to the plan as a result and plans to undertake further work.	Lessons identified, and subsequent actions, from the drought of 2022 have been incorporated into the revised draft WRMP24 Main report.	Yes	Revised draft WRMP24 Main report, Section 14

2.22 Equinor

No.	Consultee	Feedback from consultee	Our response		
1	Equinor	Equinor noted their potential water requirement for water to deliver net zero and the importance of long term industrial water supplies for the Humber region.	We thank Equinor for their response and have included an assessment of their potential water needs for net zero in our revised draft WRMP24.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.23 Essex County Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Essex County Council	**Response to consultation questions one and two** Yes, we support the reservoirs due to the provision of multiple benefits for biodiversity, nature, leisure and health/wellbeing. Your further support/investment is still necessary for additional smaller catchment nature based solutions.	We continue to explore smaller catchment nature based solutions, both as a business through our WINEP initiatives and through WRE projects such as the Norfolk Water Strategy programme and Water for Tomorrow. Further information can be found at https://wre.org.uk/.	No	N/A
2	Essex County Council	**Response to consultation question three** Yes. Provided that abstraction in the short term does not lead to environmental harm as you have committed. We feel that regional water planning teams or water companies directly have a responsibility to be more transparent in sharing data on performance against environmental targets, and measuring and monitoring of their impacts on the environment.	We have carefully considered our approach to abstraction reduction, and the impacts of not implementing all recent average actual caps by 2030, noting that changes in the amount of water abstracted does not necessarily cause deterioration or present a risk of that, nor automatically gives rise to the need for OPI. Our analysis shows that our demand management strategy will prevent the risk of deterioration (noting the previous point) by offsetting the increase in demand caused by growth. We will continue to engage with the Environment Agency on our licence capping strategy and position. We do aim to be transparent on our environmental performance; as demonstrated by our Get River Positive commitment and discussion within our Annual Integrated Report.	No	N/A
3	Essex County Council	**Response to consultation question four** Yes we support compulsory metering. Anything up to individual property visits to identify leaks and review appliance performance - providing bespoke advice for homeowners, or targeting engaged community groups.	We thank the Council for its support.	No	N/A
4	Essex County Council	**Overall comments** Our overall response to WRMPs has been that on a local level (whether part of the WRMP content or through additional resources to work collaboratively with us). We would like to see more detailed and innovative delivery plans for immediate options such as water efficiency and leakage reduction.	We have currently adopted our most ambitious plan for water efficiency as our preferred demand management plan for WRMP24, including full smart meter rollout by 2030, tied to our innovative water efficiency communications strategy, significant leakage reduction (38%) and demand management targeted at the business sector. We are keen to look at all potential methods of demand reduction, including water re-use (rainwater, grey-water) and are actively pursuing the concepts of 'water neutrality' and 'smart cities', through our 'Demand Reduction Discovery Fund' and Long Term Delivery Strategy. We will continue to collaborate with all regional stakeholders into new and innovative approaches as we progress and adapt our plans.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 5 and 10
5	Essex County Council	There needs to be more funding and resources for collaboration on immediate options such as water efficiency and leakage reduction.	We plan to build upon our proven track record of delivering demand management savings, through our leakage reduction strategy, ambitious smart metering program and innovative water efficiency initiatives. We	Yes	Demand management preferred plan technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			will extend our ambitious program of demand management options, in order to support our new revised draft WRMP24 plan; one that provides economic benefits, delivers substantial water savings, but is also achievable. Our ambition is to drive the next 'step-change' in demand management through: technological innovation, enhanced communication strategies, improved understanding of our customers behaviour, and the implementation of 'industry leading' water efficiency initiatives. Savings from our smart meter program, leakage reduction and water efficiency options, in combination with government led interventions are expected to more than compensate for regional increases in demand due to population growth during the WRMP24 planning period. With our ambitious program for full smart meter installation and associated water efficiency measures, our customers should achieve a per capita consumption of less than 110 l/h/d, in line with the 2050 National Framework Target. Note that this includes a significant impact from government led interventions ('white good' and water utility labelling and mandatory design standards). Additionally, we expect to achieve record low levels of leakage. As we develop our demand management strategy, we are keen to engage and collaborate with all relevant partners, to help drive stricter building and water efficiency regulations. We are also keen to support government led intervention policies (white good labelling). As part of our WRMP we intend to institute our 'Demand management discovery fund' in order to investigate innovative approaches to water efficiency. This will complement our 'Demand management monitoring framework', through which we intend to validate our demand management options for their effectiveness and adapt our plans accordingly.		
6	Essex County Council	We would like to see more open partnerships and collaboration on WINEP programmes and delivery of catchment scale Nature Based solutions.	We will be ensuring that a collaborative, multi-sector approach is used for the AMP8 WINEP Environmental Destination Investigations.	Yes	Revised draft WRMP24 Sustainable abstraction technical supporting document, Section 7
7	Essex County Council	There needs to be more investment in monitoring and evaluation of CSOs, WTW discharges and on the benefits of NbS at local and catchment scale.	This is considered as part of Price Review 2024, the Drainage and Wastewater Management Plan 2022 and our Long Term Delivery Strategy; these can be viewed at www.anglianwater.co.uk.	No	N/A
8	Essex County Council	There needs to be more detail on incentives and opportunities for business and industry, with better advice and information to support the economic growth sector.	We will continue to liaise with all relevant stakeholders with regard to our current (and future) water resource position and the potential for growth and development in the region. These discussions are ongoing with Local Authorities and major industrial users (including Hydrogen production and carbon capture) and also involve WRE .	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			Given the challenges that we face with regard to future water resource sustainability, we are keen to ensure that we investigate all solutions (including water re-use) in order to enable and secure long term economic growth within our region. As part of our revised draft WRMP24, we have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50. These options include potential incentivization for businesses, to save water, along with incentives to find and fix leakage. We are currently looking to trial these options with our retail partners. We will look forward to continuing these discussions as we progress our plans.		Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6 Revised draft WRMP24 Demand forecast technical supporting document, Section 7
9	Essex County Council	There needs to be more education and policy support for the planning and development sector.	We agree that more education is needed for the planning and development sector, and will continue to explore this as part of WRMP24, and our business as usual activities.	No	N/A
10	Essex County Council	There needs to be more recognition of opportunities to work collaboratively across the system to improve water, nature and the environment.	We agree that this is important and continue to pursue such opportunities in the development and implementation of our WRMP. We continue to explore these opportunities through WRE and our other partnership arrangements.	No	N/A

2.24 Everflow

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Everflow	Regional and wholesaler water resource management plans do not adequately consider the potential of the NHH market to deliver water demand reduction. Some general commitments to the NHH market are included, e.g., retrofitting NHHs with smart meters alongside households over 10 to 15 year periods, but we would like to see more details about NHH smart metering and water efficiency plans before final WRMPs.	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50. Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9
2	Everflow	Echoing MOSL's point from their WRMPs response, several WRMPs barely mention the NHH market in the main document, and in some cases, important NHH information is buried in appendices. The NHH market consumes 30% of water in England, so it's essential to include an overview of how it features in your plans in the main document. Business customers' involvement is essential to the industry meeting its demand reduction targets, but they have low awareness of water scarcity threats and how they could affect their businesses. Business customer awareness also feeds into general household awareness and employers are in a prime position to influence their employees' behaviour.	We fully agree that we need to work with Retailers and their customers in order to frame the conversation regarding water stress and the environmental destination for the Anglian region. We intend to utilise the outputs of our current WRMP to inform this process and build our communications strategies, as all stakeholders need to be involved in reaching our stated goals for non-household demand reduction. Non-household consumption accounts for a substantial proportion of overall demand in Anglian Water, representing 27% of our total demand (2022/23). Understanding and forecasting this segment of demand is crucial to the demand forecasting process. We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50.).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
3	Everflow	**Smart meters** We would like clarity on how many smart meters (AMI not AMR) you intend to deploy in AMP8 and beyond, including visibility for retailers on when and where they will be rolled out, to avoid duplication of effort or customers paying for loggers when they don't need to.	Our current intent is to install 1.1 million AMI smart meters by 2025 as part of our WRMP19 AMP7 plan. This will account for approximately 50% of our current customer base. In parallel we intend to install AMI smart meters for non-household businesses. We currently have over 600K smart meters installed, with >16K non-household customers with smart meters (as of July 2023). We intend to complete our roll-out of 2 million smart meters by 2030 for both our household and non-household customers (excluding those with loggers already installed). Note that 99.5% of the business customers in the Anglian Water region are already metered and will be smart metered by 2030. The roll-out has been targeted to areas of water stress, in parallel with the smart network installation and is shown in our revised draft WRMP24 Demand management preferred plan technical supporting document.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 3
4	Everflow	**Data sharing** We would like wholesalers to align with the national NHH metering strategy position on data sharing.	We fully agree that data sharing regarding our demand management options should be a priority as we roll-out our smart meter programme (and will be able to test and validate the effectiveness of the options). We are keen to share insights across the industry, in order to drive water efficiency with our Retail partners and their business customers. As part of our 'Demand Reduction Discovery Fund' we aim to validate demand management options for both the household and non-household demand management programmes.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6
5	Everflow	Proactive logging and continuous flow/high usage alerts for customers via retailers are also key to obtaining 'in the moment' conversations about water efficiency which NHH customers are more likely to engage with, so smart data should be shared with the customers' retailer.	As with our household smart meter roll-out, a key benefit is the identification of continuous flows and leakage in customer properties. Consequently, an area of key focus is the timely communication of potential leakage in collaboration with our Retail partners. With regard to leakage, we will leverage our smart meter introduction and the data that will be available. Continuous night flows (or irregularities in consumption) would be analysed and notifications sent to business customers, indicating a potential leak. Business customers would have the option to 'self audit', utilising on-line processes or 'virtual visits', in order to assist with the identification and repair of the leak. The audit would also help in identifying whether the leak was internal (plumbing loss, 'leaky loo') or external (customer supply pipe leakage). If the leak is internal and a plumber were to be required, water efficiency visits would be incentivised. If the leak were found to be external, we would investigate the provision of a 'find and fix' service. This type of option will be targeted at all sizes of business customer, of all types of complexity.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
6	Everflow	We would also urge wholesalers to pool their NHH benchmarking data (ideally nationally) and share this with retailers operating in their area, so that the benefits of big data can be realised and result in better targeting of water efficiency and leakage services by retailers.	We fully agree that data sharing and benchmarking for demand management options should be a priority as we roll-out our smart meter programme. We are keen to share insights across the industry, in order to drive water efficiency with our Retail partners and their business customers. As part of our 'Demand Reduction Discovery Fund' we aim to validate demand management options for both the household and non-household demand management programmes.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6
7	Everflow	**Water saving** Wholesalers are in a position to apply for funding which they can use to incentivise retailers or collaborate with us on delivering water efficiency. A collaborative approach is important to avoid undermining competition and to increase customer uptake.	As part of our WRMP24 enhancement programme, we have quantified both benefits and costs as part of our option appraisal and preferred plan development. This has now led to an estimation of approximately £5 million in funding for non-household demand management options for AMP8 (2025-2030). We expect that this funding will be used in collaboration with our Retail partners, where they will play a a critical role in delivering the water efficiency programs. We will collaborate with our Retail partners to develop incentivization schemes to pass on funding to the Retailers and their customers, with whom they have key relationships.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document:, Section 9
8	Everflow	There is low demand for water efficiency services among businesses even when they are offered for ‘free’ to the non-household customer. Retailers’ relationships with their customers are key to improving this and communications by wholesalers and retailers must be coordinated.	As part of the revised draft WRMP24 demand management option development process, and in conjunction with our WRE partners, we have engaged with our regional Retailers and business customers, in order to gauge opinion on further water efficiency measures for the business sector. This recent engagement (in association with WRE and 'Blue Marble') has been conducted to understand the retailer perspective regarding the promotion of water efficiency; to develop and refine propositions and understand and overcome barriers; to explore these propositions and how they might be implemented with retailers and non-household customers. Based upon this we have developed a number of options that we wish to implement in co-ordination with our Retail partners. These options have been considered in partnership with other wholesalers in the WRE region. We fully understand that Retailers are best placed to delivery these options, but also realise, that as the wholesaler, we are in a position to design option and gain funding through the WRMP enhancement programme.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6.

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
9	Everflow	We would like more detail on how water efficiency services will be offered to different categories of NHH customers.	On the basis of our consultation (in association with WRE and 'Blue Marble') we have designed a number of water efficiency options concentrating on smart meter targeted water efficiency visits and leakage reduction. As part of the analysis consideration, has been given to the diverse nature of businesses within the region in terms of the volumes and complexity of their usage. We have characterised and segmented non-household customers; - by sector - by volume consumed - by complexity of usage This has then allowed us to consider the scale of intervention (water visit, water audit), leakage intervention and incentivization that we would offer (in liaison with our Retail partners). These options are detailed in our revised draft WRMP24 Demand management preferred plan technical supporting document. We intend to work with our Retail partners in how best to deliver these demand management options.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9
10	Everflow	We want to be able to offer water efficiency services consistently nationwide so that water saving is simpler for NHHs to engage with. We would prefer a nation-wide approach to demand reduction so that multi-site customers have clarity about the services and funding and/or incentives available to them. This is another reason why wholesalers need to focus their efforts on incentivising and collaborating with retailers.	In considering water efficiency, we have worked with our water company partners in WRE (Cambridge, Essex and Suffolk and Affinity) to consult regionally with the Retail sector. Options have been co-developed for inclusion in our WRMP24 submissions. We support development of a co-ordinated approach, where we share information and raise awareness of the need for water efficiency and incentivise water efficiency in a coherent fashion with our Retail partners. However, we must also recognise the different needs and programmes in different parts of the country.	Yes	Revised Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6
11	Everflow	**Collaboration** However, it's important that adequate funding is transferred to retailers to cover such marketing, service provision (e.g., leak detection or water efficiency audits, products etc) and/or contact list costs, at a market rate which recognises the quality of the data they've invested in improving and enhancing since market opening. Funding also needs to reflect actual costs of engaging and delivering such services. Wholesaler water efficiency incentive schemes for retailers to date have been based on per litre usage reductions, and there are inadequate commercial retailer incentives.	As part of our WRMP24 enhancement programme, we have quantified both benefits and costs as part of our option appraisal and preferred plan development. This has now led to an estimation of approximately £5 million in funding for non-household demand management options for AMP8 (2025-2030). We expect that this funding will be used in collaboration with our Retail partners, where they will play a a critical role in delivering the water efficiency programmes. We will collaborate with our Retail partners to develop incentivization schemes to pass on funding to the Retails and their customers, with whom they have key relationships.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
12	Everflow	We would echo Waterwise's request last year for a wholesaler commitment to greater collaboration with retailers in the plan, and a more detailed plan for how they will deliver demand reduction in the NHH sector. This could involve: · Technical support with abstraction options · Providing a sterner 'police' type function when customers don't respond to retailers about potential leaks and over consumption (e.g., issuing leak notices and showing local connections with water deficits/risks to supply or the environment) · Sharing smart meter and logger data · Sharing plans for smart meter/logger roll outs · Offering white label services (as most wholesalers already do for meter reading) for leak detection and repair, water efficiency site surveys and installing water efficiency products. However, we believe a competitive market for these services would serve customers best, so do not think that wholesalers should offer these directly to NHH customers.	As discussed, we have been keen to collaborate with Retailers in developing the non-household demand strategy, and in conjunction with our WRE partners, have engaged with our regional Retailers and business customers, in order to gauge opinion on further water efficiency measures for the business sector. Based upon this we have developed a number of options that we wish to implement in co-ordination with our Retail partners. These options have been considered in partnership with other wholesalers in the WRE region. We fully understand that Retailers are best placed to delivery these options, but also realise, that as the wholesaler, we are in a position to design options and gain funding through the WRMP enhancement programme. As part of the development process we are keen to collaborate on: - current assessments regarding supply/demand issues -smart meter data and continuous flow (leakage) information -how water efficiency/leakage reduction visits can be co-ordinated and incentivised. More details on current thinking are provided in our revised draft WRMP24 Demand management preferred plan technical supporting document.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9
13	Everflow	**Drought plans** Retaining TUBs and NEUBs for peak demand or droughts is regrettable for our customers, but if they must be used, we ask that the plan details how retailers will be involved in customer communications around these. Ideally communication protocols should be agreed in advance so that they can be sent out in a timely and organised way.	In addition to our ambitious programme of water efficiency measures and leakage reduction, we have also developed an extended portfolio of options that we would apply in times of drought. These include additional communications, targeted leakage reduction and measures aimed at reducing garden or discretionary water usage. We would institute these options, based upon resource trigger points, prior to implementing TUBs or NEUBs, in order to try and avoid the necessity for these measures. We will work in parallel to develop pre-drought measure options for non-household customers, which would be implemented with our Retail partners. More detail on our drought actions and communications with retailers can be found in our 'Drought Plan 2022'. Following the drought of 2022 we are reviewing our approach to NHH communication protocols for TUBs and will share this in due course.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 11.

2.25 Fenland District Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Fenland District Council	**Response to consultation question one** Yes, prioritising reservoirs over other supply-side options is supported as there appears to be a clear case why this is a sound approach. The Council accepts that this is a low regret option which will provide a valuable source of water supply to this area as well as Cambridge, and additionally and potentially, a significant range of other benefits for local people and the environment.	We thank the Council for its support.	No	N/A
2	Fenland District Council	**Response to consultation question two** The three-tiered approach is partly supported. The demand management measures and two reservoirs seem to be logical as does water re-use. However in terms of desalination it is too early to commit to such an approach. Desalination should be kept as a long term option but other, arguably more sustainable options, such as water transfer from other areas of the UK should be considered. Looking to future water needs the prospect to develop a national infrastructure network to allow water transfer from the high rainfall regions (west and north) to the low ones (south and east) should be considered as a long-term alternative to new regionally focussed desalination plants. For the next National Framework, it would be good to see a commitment to sharing water resources on a national rather than just regional scale as seems to be	The desalination plants form the future adaptive resources part of our preferred plan. These are required from 2040 and will be informed by the WINEP investigations that will confirm the location and scale of environmental destination, so we can ensure we only develop new resources sized to meet the need. For the revised draft WRMP we have modelled a series of potential transfers from the other regional groups. At present these transfers are theoretical, as there are no immediate opportunities for importing water from other companies. However, the modelling shows how our plan could adapt if one of the regional groups, in subsequent planning rounds, developed an option which could be shared between regions. The modelling shows that our plan could adapt if imports from other regions where available in the future. The imports would have the effect of offsetting the capacity of desalination needed if these transfers were deemed better value to developing the desalination. They would not impact the capacity of the reservoirs.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 7
3	Fenland District Council	**Response to consultation question three** Yes, this would seem to be a workable approach but every opportunity to reduce abstraction should be considered.	Our initial most likely scenario incorporates time limited licences reduced to average recent actual by 2030, all other permanent licences by 2036 (scenario 4). In response to stakeholder feedback we have developed a bespoke scenario to bring forward permanent licence caps such that all available resource is fully utilised. Starting with scenario 4 we identified surplus resource that could be fully utilised by bringing forward some of the permanent licence caps (to before 2036) without triggering the need to develop additional schemes (such as desalination) at the start of the plan. We have also prioritised environmental destination reductions over drought resilience, by moving the drought in Ruthamford back to 2040. This creates a 15Ml/d surplus in 2036 which can be used to deliver earlier environmental destination reductions in our most sensitive catchments. Our demand management strategy sets out how we will reduce demand in order to avoid increasing abstraction from current licenced volumes.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
4	Fenland District Council	**Response to consultation question four** No, all customers should be allowed the choice to not have a meter as there may be particular reasons for this. However, for those with a meter installed the upgrade to a smart meter is a very good idea and should be implemented for all as soon as possible with no direct charge to the customer.	As part of our WRMP24 demand management we intend to convert all of our 'visual read' meters to AMI smart meters by 2030. We currently have installed over 600K (2023) and will complete our initial roll-out of 1.1million smart meters by 2025. We also intend to replace all of the current 'visual read' meters for non-household properties with smart meters alongside the household programme. As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options to assist these customers and will ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6.

2.26 Greater Norwich Partnership

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Greater Norwich Partnership	**Introduction** Water supply in Greater Norwich is from groundwater sources and from an intake from the River Wensum. There has been significant recent investment in the river intake to protect water quality in this internationally designated chalk river habitat, along with investment in the Norwich to Wymondham water pipeline. However, it is understood that additional sources of water supply, along with a continued focus on demand and water quality management, will be needed in the future to address growth needs, environmental protection in the light of the need to ensure that many types of development in the majority of Greater Norwich are nutrient neutral and climate change.	We have invested in our surface water abstraction from the River Wensum and a transfer from Norwich to Wymondham, both schemes developed in previous WRMPs. In AMP8 we intend to continue with this strategy, as you highlight, with a further transfer into Norwich from our strategic pipeline, that will be supported with water from the Fens reservoir. With the anticipated loss of abstraction licence from our groundwater sources at Thorpe, Postwick and Kirby Cane we need to maintain this approach of increasing connectivity and developing new, sustainable resource. This is why we have desalination planned for the area, which we hope to develop at pace, as well as continuing to investigate water recycling and catchment management opportunities.	No	N/A
2	Greater Norwich Partnership	The partnership welcomes Anglian Water's draft WRMP24. It provides a positive strategy for addressing future water supply issues and solutions for dealing with growing demand, including from population increase, whilst also protecting the environment. The solutions currently envisaged for Greater Norwich are for more water demand management measures, working in tandem with water transfers into and within the area, initially from existing supplies elsewhere and later from new reservoirs in the Fens and south Lincolnshire. In the long-term, the potential for desalination plant development is identified.	We plan to build upon our proven track record of delivering demand management savings, through our leakage reduction strategy, ambitious smart metering program and innovative water efficiency initiatives. We will extend our ambitious program of demand management options, in order to support our new revised draft WRMP24 plan; one that provides economic benefits, delivers substantial water savings, but is also achievable. Our ambition is to drive the next 'step-change' in demand management through: technological innovation, enhanced communication strategies, improved understanding of our customers behaviour, and the implementation of 'industry leading' water efficiency initiatives. Savings from our smart meter program, leakage reduction and water efficiency options, in combination with government led interventions are expected to more than compensate for regional increases in demand due to population growth during the WRMP24 planning period. With our ambitious program for full smart meter installation and associated water efficiency measures, our customers should achieve a per capita consumption of less than 110 l/h/d, in line with the 2050 National Framework Target. Note that this includes a significant impact from government led interventions ('white good' and water utility labelling and mandatory design standards). Additionally, we expect to achieve record low levels of leakage.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
3	Greater Norwich Partnership	The approach Greater Norwich and other Norfolk LPAs are taking to require the highest water efficiency standards allowable in new development through our local plans is clearly vindicated as part of the wider strategy in the WRMP to include demand management measures such as water metering and leakage reduction.	We fully support and appreciate the drive to implement requirements for the highest water efficiency standards for new developments in the Anglian Water region, reflecting the challenges and water stress we face in our area. As we develop our demand management strategy, we are keen to engage and collaborate with all relevant partners, to help drive stricter building and water efficiency regulations. We are also keen to support government led intervention policies (white good labelling). As part of our WRMP we intend to institute our 'Demand management discovery fund' in order to investigate innovative approaches to water efficiency. This will complement our 'Demand management monitoring framework', through which we intend to validate our demand management options for their effectiveness (and adapt our plans accordingly).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 6, 7 and 10
4	Greater Norwich Partnership	**Response to consultation question one** Greater Norwich officers support the draft plan due to the evidence-based approach taken by Anglian Water which shows that reservoirs have greater additional benefits and lower carbon and operational costs than other supply side options including water reuse and desalination. The key issue for Greater Norwich is that the infrastructure planned to provide water transfers to and within the area should be delivered in a timely manner in line with the strategy as mapped on page 10 of the non-technical summary of WRMP24.	We have reviewed the deliverability of our transfers as part of PR24 and LTDS. The results of this review have been included in our revised draft WRMP24.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 8 and Appendix C
5	Greater Norwich Partnership	**Response to consultation question two** The proposed three-tiered approach is robust and is supported by Greater Norwich officers. Demand management measures are both cost effective and beneficial. Prioritising reservoirs over likely more costly and potentially more carbon intensive desalination and water reuse is pragmatic and will allow for flexibility if required.	We thank The Greater Norwich Local Plan for its support.	No	N/A
6	Greater Norwich Partnership	**Response to consultation question three** The phased approach to reducing abstraction in the short term along with transfers is supported as part of the wider strategy.	We thank the Greater Norwich Local Plan for its support.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
7	Greater Norwich Partnership	**Response to consultation question four** The roll out of smart meters as part of the demand management strategy is supported by Greater Norwich officers as it is in line with approach taken through Local Plans for Greater Norwich since 2011 to promote water efficiency in new development. However, compulsory metering is likely too strong a measure. A better approach would be to make customers fully aware of the need for and benefits of metering. This includes further disseminating the information on this page of Anglian Water's website which states that most customers have saved an average of £150 by switching to measured rates and that there is the ability for customers to switch back from metered charges without having to pay more than previously paid for unmeasured charges.	As part of our WRMP24 demand management we intend to convert all of our 'visual read' meters to AMI smart meters by 2030. We currently have installed over 600K (2023) and will complete our initial roll-out of 1.1 million smart meters by 2025. We also intend to replace all of the current 'visual read' meters for non-household properties with smart meters alongside the household programme. As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. It has not proved possible to close the gap with voluntary incentives alone and our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options to assist these customers and would be keen to ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 6, 7 and 10

2.27 Hertfordshire Council Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Hertfordshire County Council	**Response to consultation question one** Hertfordshire County Council supports Anglian Water's approach of prioritising reservoir creation over other supply-side options. The county council recognises the opportunities associated with reservoir creation in the Fens and south Lincolnshire - including reduced flood risks, woodland creation and peatland restoration for carbon storage, biodiversity enhancement, and recreation. Avoiding the additional risks (such as ecological concerns related to water recycling which can impact water salinity and temperature if not appropriately mitigated) and higher carbon emissions associated with other supply-side options, is also a major benefit of this approach.	We thank the Council for its support.	No	N/A
2	Hertfordshire County Council	The county council's primary concerns with the current reservoir creation plans are related to the uncertainties surrounding construction, and how local level impacts will be incorporated into these plans. Importantly, the potential benefits associated with new reservoirs may trade off with negative local level impacts. Local knowledge and priorities must be appropriately incorporated into decision making via a robust process of regulatory oversight and stakeholder consultation.	As part of the DCO process, there will be an environment statement which carries out a full environmental assessment that looks at the full impacts of the project- both construction and operation, as well as cumulative impacts. The DCO process is a consultation led approach so engagement with key stakeholders and communities play an important part of this.	No	N/A
3	Hertfordshire County Council	The county council expects Anglian Water to show exemplary design in order to maximise benefits and minimise negative impacts of construction (see the National Infrastructure Commission design guidance 'Design Principles for National Infrastructure') and encourages Anglian Water to adopt an approach to reservoir construction which will deliver social value to the local population in terms of jobs and skills uplift.	We will follow the design principles for national infrastructure, as well as involving a design panel to provide a peer review. As part of the project, we will be developing a socio-economic strategy which will set out the socio-economic benefits of the reservoir. Social value will also be part of the EIA.	No	N/A
4	Hertfordshire County Council	Finally, any proposed new reservoir should be integrated into the relevant Local Nature Recovery Strategy.	We are currently engaging with local authorities, local environmental groups and Natural England, who are key stakeholders in the design and development of the project. This will ensure the project is in line with local plans and policies.	No	N/A
5	Hertfordshire County Council	**Response to consultation question two** The county council broadly supports Anglian Water's three-tiered approach, which allows flexibility and the opportunity to respond to changing conditions and needs in the future. It is unfortunate that the carbon emissions and other issues associated with the 'Enhanced' abstraction reduction scenario, make this approach less favourable than the plan's preferred 'Business As Usual Plus' (BAU+) abstraction reduction scenario.	We thank the Council for its support. Our preferred plan is based on 'Business as Usual Plus' (BAU+), however we do have an adaptive pathway which shows how we can adapt our plan to meet Enhance abstraction requirements. The Enhance scenario will require additional water reuse and desalination capacity to meet the additional abstraction reductions.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
6	Hertfordshire County Council	The best value plan is notably lacking in ambition in terms of its abstraction reduction targets. The county council recognises that there are potential costs associated with the 'Enhanced' abstraction reduction scenario - including negative environmental impacts as measured by assessments that take into account natural capital, habitat units, and other metrics - and supports an approach of weighing up the costs and benefits of different scenarios. However, the lack of further protection for chalk rivers, sensitive headwaters and Sites of Special Scientific Interest in the 'BAU+' compared to the 'Enhanced' scenario could result in major long-term impacts or irreversible losses in these areas, which is of significant concern. The county council therefore encourages Anglian Water to continue exploration of alternative approaches that mitigate the unfavourable impacts of the 'Enhanced' scenario while retaining its more ambitious approach in other areas.	Our initial most likely scenario incorporates time limited licences reduced to average recent actual by 2030, all other permanent licences by 2036 (scenario 4). In response to stakeholder feedback we have developed a bespoke scenario to bring forward permanent licence caps such that all available resource is fully utilised. Starting with scenario 4 we identified surplus resource that could be fully utilised by bringing forward some of the permanent licence caps (to before 2036) without triggering the need to develop additional schemes (such as desalination) at the start of the plan. Our demand management strategy sets out how we will reduce demand in order to avoid increasing abstraction from current licenced volumes. We have also prioritised environmental destination reductions over drought resilience, by moving the drought in Ruthamford back to 2040. This creates a 15Ml/d surplus in 2036 which can be used to deliver earlier environmental destination reductions in our most sensitive catchments. The WINEP investigations will be used to determine the location and scale of abstraction reductions, this will include the Enhance scenario. Our adaptive plan will enable us to follow the adaptive pathway to Enhance if this is appropriate in the future.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10
7	Hertfordshire County Council	**Response to consultation question three** The county council supports Anglian Water's long-term approach of focusing on those supply-side options that deliver more environmental benefits and are associated with fewer risks. This should be coupled with an effective demand reduction strategy, and short-term supply-side options which do not cause environmental harm.	We thank the Council for its support. We will continue to focus on an effective demand management strategy, as well as short term supply-side options that do not cause environmental harm.	No	N/A
8	Hertfordshire County Council	As stated in the county council's response to question one, particular attention should be given to the local impacts of new reservoirs. Regulatory oversight and local stakeholder consultation are essential.	As part of the DCO process, there will be an environment statement which carries out a full environmental assessment that looks at the full impacts of the project- both construction and operation, as well as cumulative impacts. The DCO process is a consultation led approach so engagement with key stakeholders and communities play an important part of this.	No	N/A
9	Hertfordshire County Council	The county council supports the adaptive approach - whereby abstraction is reduced on a progressive, catchment-by-catchment basis - adopted by Anglian Water, and recognises the benefits of learning lessons from ongoing abstraction reductions and investigations. However, this approach results in considerable uncertainty surrounding Anglian Water's future environmental impacts. For example, the scale and some locations targeted for abstraction reductions will be decided towards the end of AMP8 (i.e. ahead of 2030) in light of ongoing investigations. While these investigations are carried out, abstraction continues with unknown environmental consequences. This is particularly concerning in ecologically important	Since the draft WRMP24, we have had confirmation of early start funding for our Environmental Destination Investigations, thus, the scope will be finalised towards the end of this year to start the work at the end of 2023/start of 2024.	Yes	Revised draft WRMP24 Sustainable abstraction and environment technical supporting document, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		and environmentally sensitive areas such as internationally rare chalk rivers, environmentally sensitive wetlands and other habitats, and Sites of Special Scientific Interest. The impacts of some supply-side options are also not yet known due to a current lack of information. Of major concern is the potential impact of sea level rise and flooding on supply-side options. The county council therefore encourages Anglian Water to carry out investigations as rapidly as possible to inform decision-making, and to prioritise high abstraction reductions underpinned by ambitious demand management strategies wherever possible.			
10	Hertfordshire County Council	The county council urges future decision-making to be fully transparent, including via the publication of relevant data emerging from ongoing investigations. Currently, Anglian Water's Monitoring Plan, as outlined on page 102 of dWRMP24, appears sparse compared to those of other water companies; for example, Thames Water's plan to report progress quarterly as well as in WRMPs. The county council encourages Anglian Water to consider more regular, clearly communicated progress reports and publication of relevant data in order to enable effective scrutiny of these important decisions which will shape future water resource management.	We agree that a monitoring plan is key to providing us with the information, and time, needed to make decisions on which future pathway we need to follow. We have progressed the development of our monitoring plan between draft and revised draft WRMP24, reviewing our trigger and decision points and furthering our demand management monitoring framework. This framework will also us to investigate and understand our customers' consumption patterns and attitudes to water consumption, scientifically analyse the demand management portfolio ensure our water efficiency teams are concentrating on the most effective options, and model and test demand management options so they can be realistically included in our future forecasts for WRMP29 and beyond. This monitoring framework will be reported on annually through the Annual Review that is submitted to the Environment Agency.	Yes	Revised draft Demand management preferred plan technical supporting document, Section 13.4 Revised draft Decision making technical supporting document, Section 10
11	Hertfordshire County Council	**Response to consultation question four** The county council recognises that metering is an effective way to reduce demand, including by identifying leaks, and has other benefits such as enabling households to understand and monitor their own water usage. It therefore acknowledges the potentially large benefits that compulsory metering offers. However, possible negative consequences of metering on some customers, and ways to mitigate those consequences, must be explored. Vulnerable and lower income customers should be supported, for example with lower tariffs, to ensure that essential water use remains affordable.	As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. This is detail in our 'Demand management preferred plan technical supporting document'. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options to assist these customers and would be keen to ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 4, 7, 8 and 10 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
12	Hertfordshire County Council	The county council commends other innovative approaches being explored by Anglian Water - such as incentives for behaviour change, and research into the most effective demand management interventions. It supports rigorous research and in-depth engagement with customers to develop a strong evidence base to inform successful approaches	We thank the Council for its support.	No	N/A
13	Hertfordshire County Council	The county council acknowledges that Anglian Water has already attained low leakage rates relative to other UK water companies. However, it encourages continued exploration of options for leakage reductions as this is a demand management approach that is firmly within Anglian Water's control, and a way for the company to lead the way on improved water resource management.	As part of our preferred plan we have now included a significant programme of mains replacement in order to achieve our maximum feasible level of leakage reduction. We have currently estimated that 8,654km of mains replacement will be required to achieve our ambition for a 38% leakage reduction, at a significant cost of over £4 billion. We understand that this is a considerable commitment, but have weighted the programme beyond AMP8, such that further investment might be mitigated by new technologies as we develop the WRMP29 plan. With our preferred plan our intention is to show the scale of our ambition as a leader in leakage reduction and make a fair and equitable contribution to the overall national leakage target, such that the preferred plan provides us with an ambitious, but achievable goal. However, we will continue to actively explore how the use of state-of-the-art technology can help us to achieve further leakage reductions, and mitigate the future costs that might be associated with this level of leakage reduction.	Yes	Revised draft Demand management preferred plan technical supporting document, Section 8 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 4
14	Hertfordshire County Council	The county council would like to highlight that non-household demand reduction should, like household reduction, be a priority. The county council encourages Anglian Water to apply similarly innovative approaches in this area, and where possible lay out more detailed plans for non-household demand reduction measures in the Final WRMP24 Plan. This should include those approaches alluded to in the draft plan such as encouraging businesses to adopt water recycling methods.	Non-household consumption accounts for a substantial proportion of overall demand in Anglian Water, representing 27% of our total demand (2022/23). Understanding and forecasting this segment of demand is crucial to the demand forecasting process. We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50. Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). On the basis of our consultation responses, we have included demand that might	Yes	Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			be associated with potential H2 production and carbon capture (approximately 60Ml/d by 2031/32). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners.		

2.28 Historic England

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Historic England	**Summary advice** We support the approach to planning that identifies the 'best value' option, whereby decisions are made based not on cost alone but with consideration of other factors such as benefits to customers, the environment and society.	We continue to use our best value planning framework to ensure we look beyond cost and help to deliver benefit to customers, society and the environment.	No	Revised draft WRMP24 Our Water Resources Management Plan 2024
2	Historic England	We are concerned by inadequate reference to the historic environment in the plan. We observe generally a lack of suitable references to the historic environment in the plan. In our response we explain why the historic environment is important in relation to water plans and have made recommendation on how the historic environment in the Plan in order to address these issues.	Within our revised draft WRMP24 Environmental Report, we have a focussed section on the historic environment SEA objective. There is a narrative for each of the four plans in terms of the Historic Environment. In addition to this, further reference has been made to the importance of the historic environment within the main report and environmental report non-technical summary.	Yes	Revised draft WRMP24 Environmental Report, Sections 6 and 7 Revised draft WRMP24 Environmental Report Non-Technical Summary
3	Historic England	There is a need for more information on the location of proposed development and for heritage impact assessment of proposed sites. We note that the plan includes number of projects and proposals. The Plan and its supporting documents include very little clear information about the precise location of proposals. This makes it very hard for us to consider potential impacts. While in some cases, a spatial expression is impractical or currently unknown, we would greatly appreciate more clarity about the location of proposals where they are known, so that we and indeed all parties can consider the potential impacts of proposed development. We offer initial comments on specified proposals below and will comment as appropriate as more details are made clear.	Since receiving the consultation feedback on the lack of project specific information, we have met with Historic England. Here it was explained that due to the nature of a high-level strategic plan, we are not at a stage to share project-level details as they have not been fully developed at this point. Once we are at a project-level stage, we will be engaging with Historic England and other stakeholders for feedback.	No	N/A
4	Historic England	Whilst we appreciate that at this stage some of these proposals are in their infancy, we provide some advice, in relation to designated heritage assets in the broad locations of the proposals and the need for early consideration of the potential impact on heritage assets and their settings and the need to avoid harm to heritage assets in the first instance. Supporting the proposed allocations needs to be heritage impact assessment, at a level of detail proportionate to the proposal and local environment. Paragraph 1.7.3. of the Draft National Policy Statement for Water Resources Infrastructure (2018) states that: "Schemes that are included in a final published WRMP will have been assessed to inform suitability and ensure they do not have any unacceptable environmental impacts that cannot be overcome." Paragraph 2.5.6 in the draft NPS states that "Any option included in a final WRMP will need to consider feasibility	We welcome Historic England's advice of conducting a heritage impact assessment, however, as we are at a strategic plan-level the information required to develop this assessment is not available. At this stage we have assessed the potential impact of our plan (and alternative plans) through the use of the historic environment SEA objective/sub-questions. We will be engaging with Historic England in the coming months to discuss our options that will be developed within the next AMP to understand the next steps in terms of assessing the potential impact on the historic environment and how best to engage with Historic England throughout the development process.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		and reliability as well as taking account of potential environmental and social impacts". We have yet to see evidence that would meet the above requirements relating to the historic environment.			
5	Historic England	We raise some concerns about the level of heritage assessment in the SEA for some projects. We provide brief comments in relation to the Strategic Environment Assessment, noting that in terms of heritage the assessment seems to focus more on the Reservoirs and one pipeline transfer, with very little consideration of other potential projects.	Within our revised draft WRMP24 Environmental Report, we have a focussed section on the Historic Environment SEA objective. There is a narrative for each of the four plans in terms of the Historic Environment.	Yes	Revised draft WRMP24 Environmental Report, Sections 6 and 7
6	Historic England	**Lack of reference to historic environment through the plan** In view of the relevance of the historic environment in Plan making for water as outlined above, we are disappointed to see that there is almost no reference to the historic environment in the Draft WRMP. Our overall impression of the Plan is that it is very focused on the natural environment with almost no reference to the historic environment. This imbalance needs to be addressed. It is essential that Plan is provides an integrated approach and specifically considers the historic environment. In the final draft of the Plan we would recommend the addition of some paragraphs relating to the historic environment. For example, instead of just referring to environment, it could specifically mention the natural and historic environment.	Our WRMP has a more direct relationship with the natural (water related) environment than the historic environment, which is due to the WRMP itself focussing on provision of water resources for our customers. During the plan-making process, we undertake six environmental assessments to understand the likely consequences of potential future actions that we could include in the final plan. The SEA is the only assessment that includes the historic environment; the other five assessments are required to focus on specific issues related to ecology and the water environment. However, within the revised draft WRMP24 Environmental Report, there is further explanation of the historic environment SEA objective for Plan B, as well as the three alternative plans .	Yes	Revised draft WRMP24 Environmental Report, Sections 6 and 7
7	Historic England	It should be noted that WINEP investigations could also consider impact on historic environment.	We will be considering the potential impact on historic environment within our AMP8 WINEP investigations.	Yes	Revised draft WRMP24 Sustainable abstraction and environment technical supporting document, Section 7
8	Historic England	Environment enhancement and restoration is very much focused on the natural environment. This scope should be widened to include opportunities to enhance the historic environment. The company could reference restoring the natural and historic environment (for example peatland restoration can aid preservation of waterlogged archaeology).	Our WRMP has a more direct relationship with the natural (water related) environment than the historic environment, which is due to the WRMP itself focussing on provision of water resources for our customers. Therefore, within the enhancement and restoration of the environment, for which they are specific targets, there is more of a focus on the natural environment. However, we will include the historic environment in scheme-level assessments, in consultation with Historic England.	No	N/A
9	Historic England	We welcome the reference to heritage protected sites but its not just about designated protected sites but also non-designated archaeology at risk of dewatering for example.	As we are currently at the strategic plan scale, non-designated archaeology has not been accounted for due to the infancy of projects in the plan. Once we are at project level, non-designated archaeology will be accounted for.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
10	Historic England	Chalk streams and rivers are not the only environmentally sensitive areas. The company needs to identify and consider what areas of the historic environment are sensitive vulnerable to change.	Our WRMP has a more direct relationship with the natural (water related) environment than the historic environment, which is due to the WRMP itself focussing on provision of water resources for our customers. Thus, there is more focus upon chalk streams and rivers as environmentally sensitive in relation to the WRMP.	No	N/A
11	Historic England	There is currently no reference to the historic environment in relation to the peat restoration. We know that peatlands are very important in relation to archaeological preservation. It is important to safeguard preservation of archaic peat during restoration works. You could add that healthy peatlands are also beneficial for archaeology.	We understand the importance of peat restoration in relation to archaeological preservation, however, as this is a strategic plan for securing public water supply this reference is currently not included. It should be noted that through engagement with Historic England for the environmental destination investigations, this will be discussed further.	No	N/A
12	Historic England	Benefits of reservoirs could also include historic environment benefits. Whilst we appreciate the investigative costs, there is no mention for example of the public benefit new discoveries could have. There is the potential to highlight the opportunity for Anglian Water to champion and protect our heritage and provide public aces/knowledge to our past.	We have commenced a technical working group specifically looking at the Historic Environment for the reservoirs in which Historic England and Local Authorities are a part of. In addition to this, we will be including a chapter on the historic environment within the environmental impact assessment which will be informed through a historic environment strategy.	No	N/A
13	Historic England	For environmental destination, we want to encourage you to adopt a wider definition of the environment to include the historic environment as well as the natural environment.	Within our revised draft WRMP24 Sustainable abstraction and environment technical supporting document, we have updated the Environmental Destination Investigations to include reference to the historic environment. As these investigations develop, engagement with Historic England and other stakeholders will be fundamental to ensuring a multi-sector, collaborative approach.	Yes	Revised draft WRMP24 Sustainable abstraction and environment technical supporting document, Section 7
14	Historic England	Whilst we welcome the consideration of capital carbon in the choice of sites, excavations can release a lot of carbon. Early engagement with historic England and well researched Desk based assessments could help to avoid archaeologically sensitive areas and thereby help you to reach your environmental targets.	As our WRMP is at a strategic plan level, this consultation feedback for consideration of capital carbon in terms of excavation will be noted for the project level.	No	N/A
15	Historic England	The Plan should also include a few paragraphs summarising why the historic environment is important in the context of water resource planning and management, what steps have been taken so far to consider the historic environment and how proposals will need to take the historic environment into account going forward.	Following this feedback from Historic England, further information on the importance of recognising the historic environment has been presented within the revised draft WRMP24 Environmental Report. The relationship with the historic environment has been described, along with how it has been accounted for in the environmental assessment process. In addition, further detail is presented on the assessment of the historic environment SEA Objective. Following receiving the consultation response from Historic England, we had a useful meeting to discuss the concerns raised and another meeting will be had in the coming months to discuss the AMP8 options and the appropriate assessments in terms of historic environment needs at a project level.	Yes	Revised draft WRMP24 Environmental Report, Sections 4, 6 and 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
16	Historic England	**Best Value Plan 2050** The Plan lacks a definitive list of the proposals that are being taken forward in the Best Value Plan. Whilst lots of different options are mentioned, and some of the options are shown in diagrammatic form on a map, it is not entirely clear from this document what is being proposed. The final draft of the Plan should be much clearer in this regard. Clearer site addresses or search areas would be helpful. More detailed mapping would also be useful.	We have updated our revised draft WRMP24 Environmental Report to present a clear list of the components of the Best Value Plan and three alternative plans.	Yes	Revised draft Environmental Report, Sections 6 and 7
17	Historic England	We understand that Plan B has been identified as the Best Value Plan. The plan outlines a number of projects and proposals for the period to 2050. Although we are actively engaged in a number of these schemes, there is very little information about some of the other schemes at this stage. The plan is also quite vague about the location of some of these schemes making it difficult for us to provide detailed comments on some of the proposals or to verify the assessments.	In our WRMP we are not able to provide maps or specific locations of proposed assets for security reasons. In most instances our new resource options refer to a generic location and no specific sites have been selected. Similarly for transfers, routes have been looked at for feasibility and costing purposes but these are not yet finalised and will go through formal planning processes. This could change the route and therefore it would not be appropriate to publish maps or routes at this stage. It is worth noting that, during our high level route optimisation assessments, historic sites are among the highest on the list of designations to avoid.	Yes	Revised draft WRMP24 Supply side options development technical supporting document, Section 6
18	Historic England	**Evidence: Site Selection and Heritage Impact Assessment including assessment of archaeology** Many of the proposals outlined in the Plan require a degree of site selection. It is important that the historic environment is an early consideration in this process, not an afterthought simply to be mitigated after the selection of a site. Any site-specific proposals would need an appropriate level of historic environment evidence to inform site selection. Early engagement with the regional Historic England office is recommended. We are not aware of any heritage impact assessment work having been undertaken for the majority of the proposals set out in this plan. This is a concern and something we recommend is addressed. We would be happy work with promoters of these schemes to help support impact assessment and provide expertise. We appreciate there has been some heritage appraisal work for the reservoirs although as you will be aware, we have written separately to Anglian Water regarding our concerns in respect of the approach to site selection taken in that case. It is important that a degree of heritage impact assessment is undertaken at Plan making stage, (i.e. now) in line with the advice in our site allocations document referenced above. Please ensure that there is sufficient heritage impact assessment and an appropriate evidence base to inform the site selections including the selection of broad locations (e.g. for Water Re-use Plant, transfers and desalination etc.).	The historic environment is an important component in the site selection process for options and will taken forward into these processes. In terms of the site selection process for the reservoirs, a rigorous site selection process was undertaken where we included the historic environment within Stage 3 (Fine Screening) and Stage 4 (Site Appraisals) to help determine the preferred site.	No	N/A

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19	Historic England	It is also important that archaeology is given consideration at an early stage in site assessment selection in both in Plan making but also for specific schemes. In order to take account of unrecorded and non-designated archaeology, the relevant Historic Environment Record should be referred to, and the views of local authority archaeological advisers sought. Historic England is able to provide further advice in relation to what archaeological assessments may be proportionate and appropriate both now to inform the Plan and in the future at each stage of the process. Please contact us to arrange a meeting if this would be helpful. Provision should also be made for early archaeological investigations on the ground. Archaeological investigations take time and making an early start helps to de-risk the project and reduces delays to construction. Historic England has also produced a technical advice note relation to Lakes and Water Features | Historic England which you may also find useful.	We thank Historic England for their advice and look forward to working with them as the schemes develop.	No	N/A
20	Historic England	**Project and location specific comments on proposals in Plan** We note that some of the measures in the Plan are unlikely to impact on the historic environment, such as helping customers to reduce their water use. In this letter we focus on the areas of activity where the historic environment is a key consideration, based on the information available, and the need for further evidence to ensure that potential impacts inform the choices made. We have made our best efforts to identify proposals where their location is known, either specifically or more broadly. However, we can only comment where there is clear information available. Consequently, we request further engagement as the different proposals are progressed. For each of the proposals in the Plan, we set out some brief location specific comments. These should be read alongside the more general comments on site selection and heritage impact assessment above which apply to all of the schemes	We welcome Historic England's feedback on the plan within their consultation response. It should be noted that at the strategic plan-level, the information required for Historic England to engage on location specific points, is high-level in it's nature. Therefore, as individual options of the plan progress, Historic England will be engaged so further information can be shared.	No	N/A
21	Historic England	**New transfers and time limited transfers** Clearly it is impossible for us to comment on potential impacts on the historic environment without clarity on the proposed route corridor of each pipeline. In general terms, our primary focus regarding new pipelines (assuming they are underground) centres on direct physical impacts on heritage assets, in particular on archaeological remains, rather than temporary setting impacts during construction (which may of course require mitigation, but which by definition will not be permanent).Heritage impact assessment, scaled proportionately to the proposal, is needed to inform the route of any new pipelines, including relevant liaison with local authority historic environment services, taking into the designated and	As our WRMP is at a strategic plan level, the routing for transfers has the potential for change at a project level, therefore, when the timing is appropriate a heritage impact assessment will be completed.	No	N/A

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		non-designated heritage assets and the potential for unknown archaeological remains. To date we have not seen evidence that sufficient assessment has been done and we ask for sight of relevant assessments and the opportunity to comment.			
22	Historic England	Additionally, we flag that an archaeological watching brief is only appropriate where one can be confident about the significance of the remains that may be encountered. It is less helpful when there is a lack of information available on the local area. We emphasise that impacts on buried archaeological remains are permanent and irreversible (in contrast with temporary impacts on setting of other assets). To establish if potential impacts are acceptable requires input from a heritage professional, with reference to impact on heritage significance.	Once at a project-level and the option is being further developed, we will engage with Historic England on an archaeological watching brief and discuss next steps.	No	N/A
23	Historic England	Any works that would pass through scheduled areas would, under the 1979 Ancient Monuments and Archaeological Areas Act, require scheduled monument consent (SMC) and we would not usually recommend to DCMS that this be granted. Any pipeline routes or other infrastructure should be routed outside scheduled monument boundaries; typically we would recommend a buffer of at least 10 metres, subject to the results of further archaeological investigation.	As our WRMP is at a strategic plan level, the routing for transfers has the potential for change at a project level, therefore, when the timing is appropriate scheduled areas would be considered.	No	N/A
24	Historic England	A large number of transfer schemes are mentioned in the WRMP. The only one identified as having moderate adverse impacts on the historic environment is SWC8 Cambs and West Suffolk to Cambridge Water potable transfer. We do not have sufficient information in relation to the routing of other proposals to determine whether they are likely to have impacts on the historic environment. In common with other proposals in this Plan it is difficult to provide comments without knowing precisely where development is proposed, and the current lack of contextual information and heritage assessment means that the historic environment would be vulnerable to inappropriate development. Negative impacts on heritage assets and their settings will depend on the proximity, design and mitigation of development. As set out above, we would expect any proposed development in this area to be based on evidence including a heritage impact assessment.	We understand the concerns raised by Historic England over the lack of information and heritage assessment for the supply-side options in the WRMP24. As we are currently at a plan-level, there is not sufficient detail for the option to undertake a heritage assessment. Once at a project-level and the option is being developed, we will be engaging with Historic England to share the information on location / context and understand the appropriate assessments to conduct.	No	N/A
25	Historic England	Historic England has provided detailed advice on the Strategic Pipeline Scheme. We have provided specialist advice to the scheme's consultants and the local planning authority archaeological advisors regarding the potential archaeological impacts of the proposals. This has been particularly important within the Fenland areas where issues surrounding potential impacts on palaeo-environmental remains and scheme_x0002_derived	We thanks Historic England for its feedback and will be incorporating lessons learnt on the strategic pipeline scheme and related engagement with Historic England when options are being progressed at a project-level.	No	N/A

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		hydrological impacts on scheduled monuments and non-designated archaeological remains, both within and beyond, the pipeline corridor have required careful assessment and mitigation options. The above-ground infrastructure of these schemes is relatively limited and consequently there are few issues relating visual impacts on the setting of designated heritage assets such as scheduled monuments and listed buildings. We recommend that future schemes draw on the lessons learned on the New Strategic Pipeline, allowing more time for archaeological investigations in the programme.			
26	Historic England	**Desalination** Four potential desalination plants are being considered around the East Coast. Desalination plants can vary enormously from large scale industrial type units to outdoor plant, more akin to a STW. At present it is unclear about the nature and scale of these proposals. It is important for us to be able to understand what exactly is being proposed to help inform our response. There is a need to consider the impact on designated and undesignated heritage assets in the intertidal zone (and beyond). This might include sensitive intertidal peat deposits and remnants of a submerged forest. There may also be the potential for shipwrecks and similar sites which could also be affected. Impacts can be caused by construction related works and during the operational phase (i.e. will new structures alter scour patterns and lead to nearby heritage assets being damaged by erosion?). With a scheme such as this, one of the primary areas of concern will be changes to the water environment for archaeological sites and deposits (both designated and undesignated) which may lead to their degradation and the loss of information. This may include sites some distance away. It may be useful to think potential synergies between any already identified risks to habitats that are permanently lost or temporarily impacted by the proposals (which you are considering from a natural environment perspective) and the historic environment; i.e. recognising a wetland environment may also be an important palaeo-environmental resource.	We understand Historic England's concern over changes to the water environment for archaeological sites and deposits in terms of the desalination plants being proposed. As we are at a strategic plan-level the detail required to engage efficiently has not been developed yet. Once at a project-level and the options are being developed, engagement with Historic England will be fundamental to understand the potential impacts on the historic environment.	No	N/A
27	Historic England	Mablethorpe - In terms of designated heritage assets there are several grade II listed buildings within and close to Mablethorpe, as well as 3 scheduled monuments inland of the settlement. Sensitive intertidal peat deposits and remnants of a submerged forest have previously been identified near Mablethorpe.	We welcome the detail shared from Historic England on Mablethorpe; once at the project-level and with further information we will be engaging with Historic England to understand this information further.	No	N/A

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28	Historic England	Caister-on-Sea - There are a number of designated heritage assets in and around Caister. Within Caister there us the Roman Fort and Saxon settlement which is a scheduled monument, the grade II* Church of Holy Trinity and a number of grade II listed buildings. To the north of the town there are several grade II listed buildings along Yarmouth Road. Caister Castle, a scheduled monument and Grade I listed building, lies to the west of the town, close to the grade II * Caister Hall. The Grade II St Edmunds Church and ruins of St Edmunds Church also lie to the west of the town. The Halvergate Marshes Conservation Area lies to the south west of Caister. Finally, to the south of the town lies a grade II listed building.	Within the revised draft WRMP24 BVP, Caister desalination plant is no longer selected. Thus, the information shared from Historic England on the area will be noted, and if appropriate, engagement will occur at a project-level.	No	N/A
29	Historic England	Felixstowe Conservation Area stretches along the coast in the town. The Conservation includes The Cliff Gardens and Town Hall Garden which is a grade II registered park and garden as well as a number of grade II* and grade II listed buildings. Landguard Fort, a scheduled monument and grade I listed lies to the south of Felixstowe. To the north of Felixstowe there a couple of listed Martello Towers and Bawdsey Manor registered Park and Garden (grade II) and its associated listed buildings lies across the River Deben. Across the Orwell estuary there are further clusters of heritage assets (scheduled monuments and listed buildings in Harwich and Shotley Gate.	Within the revised draft WRMP24 BVP, Felixstowe desalination plant is no longer selected. Thus, the information shared from Historic England on the area will be noted, and if appropriate, engagement will occur at a project-level.	No	N/A
30	Historic England	Holland-on-Sea There is a scheduled monument (the Remains of a medieval parish church and cemetery) to the east of Holland on Sea. Oakwood Inn, on Frinton Road is also grade II listed as are 3 buildings off Sladburys Lane.	We welcome the detailed shared from Historic England on Holland-on-Sea; once at the project-level and with further information we will be engaging with Historic England to understand this information further.	No	N/A
31	Historic England	**Water re-use** Colchester Reuse - without knowing which area is being considered it is difficult to comment on potential sites. However, Colchester is an area rich in heritage, with large areas of scheduled monuments around the edge of the town and many other designated heritage assets. Selection of the site will need to carefully consider the potential impacts on the historic environment and seek to avoid harm to heritage assets and their settings.	We welcome the detailed shared from Historic England on Colchester; we will be in contact with Historic England in the coming months to engage on the development of Colchester Reuse.	No	N/A
32	Historic England	**Raw water storage reservoirs** Lincolnshire Reservoir - Historic England have been involved in negotiations regarding the Lincolnshire reservoir for approaching two years. Concerns remain and discussions are ongoing. As previously stated, broadly speaking wherever the development would be placed, it will be likely to have an impact upon the historic environment in some form. This includes designated and non- designated heritage assets and, in this case, includes the possibility of encountering peat and fenland	We have ongoing engagement with Historic England as part of the Lincolnshire Reservoir development process. Historic England are also part of our technical working groups which will inform the Environmental Statement which will be produced as part of the Environmental Impact Assessment.	No	N/A

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		deposits which may provide additional information of a palaeo-environmental, archaeological or anthropogenic value. Historic England have been advising on the assessments required, following which Historic England will be able to provide more detailed comments. The site is surrounded by the historic villages of Scredington, Helpringham and Swaton, associated heritage assets, including Thorpe Latimer Medieval moated site, settlement and cultivation remains, post-medieval park and garden Scheduled Monument (1010708) together with views between the Grade I churches of these villages, which also require detailed assessment. There is a high risk of nationally important archaeological remains (this requires a staged process of evaluation and modelling of deposits and impacts to inform the determination of applications / EIA and design and mitigation, with sufficient time and resources to undertake and write up and publish the archaeological work that will be necessary if this site is taken forward).			
33	Historic England	Fens Reservoir - Historic England has been engaged in ongoing discussions with Anglian Water in relation to the Fens Reservoir for over a year. The selected site to the north of Chatteris has the potential to affect a number of designated heritage assets and their settings. To the north west of the site lies a scheduled monument, the Moated bishops' palace at Manor Farm. Doddington Conservation Area and associated listed buildings (including the grade II* listed Church of St Mary and various grade II listed buildings) lies further to the west. There are four scheduled monuments to the east and north east of the site. There is a Romano-British settlement near Honeybridge just to the north east of the site. In addition, there are three bowl barrows; one 580m east of Mount Pleasant Bridge, another bowl barrow 250m south of Honey Farm and a bowl barrow 600m west of Honey Hill Farm. The grade II listed Holly House Farmhouse lies to the east of the site along the Forty Foot Drain. To the south of the site lies the Chatteris Conservation Area, with numerous listed buildings including the grade I Church of St Peter and St Paul. The presence of the three bowl barrows just to the east of the scheme would seem to indicate the archaeological potential of the area around the proposed reservoir. In particular there are likely to be known and unknown non_x0002_designated heritage assets within the footprint of the proposed scheme, some of which could be of equivalent significance to a designated asset.	We have ongoing engagement with Historic England as part of the Fens Reservoir development process. This includes regular bilateral meetings as well as technical working groups which will inform the Environmental Statement which will be produced as part of the Environmental Impact Assessment.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		Non-designated archaeology could vary widely from find-spots of artefacts to structural remains, palaeo-environmental evidence and locally listed buildings. Limited archaeological work has previously been carried out in this area, and we know relatively little about the archaeology here, although the potential for the recovery of evidence human activity is high.			
34	Historic England	Potential Reservoir at Hall, Lincolnshire- the presence of scheduled Roman military sites (a vexillation fortress and two marching camps) in the immediate vicinity of the scheme indicates the high archaeological potential of the area around the proposal, and there is high potential to harm buried archaeological remains associated with the scheduled monument and to affect the setting of the scheduled monument. It should be noted that the area of the scheduled monument represents only what was visible from aerial photos at the point in time that the scheduling decision was made, and not the actual extent of the camps or the surviving archaeology. The potential for nationally significant remains at the site has previously been demonstrated during a 2011-12 program of evaluation for the present reservoir, which discovered a Roman oven containing the remains of Roman bread. This is an exceptionally rare discovery. Significant non-designated archaeology is not limited to Roman features and could vary widely from find-spots of artefacts to structural remains and palaeo_x0002_environmental evidence of all periods. Of interest in this area is the early prehistoric activity (including a Mesolithic occupation site, first identified in investigations undertaken in the 1980s). It will also be very important to develop an understanding of movement along and across this part of the Trent from the Roman through the Early Medieval periods (including Viking). It should not be assumed that the fieldwalking, geophysical survey and evaluation undertaken for the present reservoir will provide an adequate baseline of data for new works at the site, and it should be ensured that the opportunity is taken to begin new studies and investigations at the site at the earliest opportunity. This should include the construction of a deposit model (using existing data, with the acquisition of further information where necessary) and the use of this to inform the design of a new program of geophysical survey. Negative impacts on heritage assets and their settings will depend on the proximity, design and mitigation of development. As set out above, we would expect any proposed development in this area to be based on evidence including a heritage impact assessment.	We welcome the detailed shared from Historic England on the potential reservoir at Hall; once at the project-level and with further information we will be engaging with Historic England to understand this information further.	No	N/A

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35	Historic England	**Smaller resource options** Raydon WTW- we presume this is the site to the south of Great Wenham. There are a number of listed buildings nearby including the Wenham Place, St Johns Church and Priory Farmhouse all listed at grade II* as well as several grade II listed buildings and structures. Development in this area has the potential to impact upon these heritage assets and their settings. As set out above, we would expect any proposed development in this area to be based on evidence including a heritage impact assessment.	We welcome the detailed shared from Historic England on the potential scheme at Raydon WTW; once at the project-level and with further information we will be engaging with Historic England to understand this information further.	No	N/A
36	Historic England	Covenham Reservoir/WTW and transfer scheme- we presume some of the works associated with this option will be at the site of Covenham Reservoir. There are a number of undesignated heritage assets in the vicinity of this site, l including remains associated with the medieval settlement of Covenham St Bartholomew. Development in this area has the potential to impact upon heritage assets such as this. As set out above, we would expect any proposed development in this area to be based on evidence including a heritage impact assessment.	We welcome the detailed shared from Historic England on Covenham; once at the project-level and with further information we will be engaging with Historic England to understand this information further.	No	N/A
37	Historic England	Extension of RTS21- it is not clear where this scheme is and so we are unable to provide meaningful comments.	The option at RTS21 is an upgrade to Clapham WTW, please see further detail in the revised draft WRMP24 Supply-side options technical supporting document.	No	N/A
38	Historic England	**Strategic Environmental Assessment** The SEA is not particularly easy and clear to follow. Many of the schemes are just referred to as abbreviates and the locations are not always clear. This makes it difficult for us to verify the assessment, identify known risks and consider whether the appropriate heritage assets have been taken into account as part of the assessment.	Following the consultation feedback on the clarity of the SEA, the revised draft WRMP24 Environmental Report has undergone restructuring to improve this. In addition, the SEA matrices, previously presented in Appendix E are now locked spreadsheets which have improved accessibility.	Yes	Revised draft WRMP24 Environmental Report
39	Historic England	In terms of historic environment assessment, it would appear to focus primarily on the potential impacts of the reservoirs and maybe one transfer option. It does not seem to offer a full review of all the options/proposals being considered, any of which are also likely to have impacts on the settings of heritage assets, even if not direct impacts.	As we are currently at the strategic plan level, we have assessed the plan as a whole ensuring that all options have been assessed at this plan-level.	Yes	Revised draft WRMP24 Environmental Report, Section 6
40	Historic England	P1 Reference is made to Natural Capital Assessment. However, currently the historic environment is poorly represented within these approaches and the material role the historic environment plays in shaping the natural work is not considered.	Defra's Enabling a Natural Capital Approach (ENCA) guidance and the UK's Green Book does not currently include numerical values for quantification of this impact, which is why it has not been included to date. Please see THE revised draft WRMP24 Environment Report for reference to the importance of the historic environment within the environmental assessments.	Yes	Revised draft Environmental Report, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
41	Historic England	Broadly speaking historic environment matters can have a formative and integral role in understanding Ecosystem service. It is important to note the role of the historic environment in making up the fabric of the 'natural' environment: England's environment as it exists today is the result of human activity over millennia, which has shaped the landscapes and which forms the foundation of regional and local identity.	Defra's Enabling a Natural Capital Approach (ENCA) guidance and the UK's Green Book does not currently include numerical values for quantification of this impact, which is why it has not been included to date. We have stressed the importance of the historic environment within the environmental assessments.	Yes	Revised draft WRMP24 Environmental Report, Section 4
42	Historic England	The lack of inclusion of the historic environment within the ecosystem services analysis here is therefore of concern. It means for example that opportunities for better integration of historic and natural environment solutions could be missed. It could also lead to a disjointed view of the landscape that could hinder, rather than encourage the integrated management of an area that considers the past, present and future of a place.	Defra's Enabling a Natural Capital Approach (ENCA) guidance and the UK's Green Book does not currently include numerical values for quantification of this impact, which is why it has not been included to date. We have stressed the importance of the historic environment within the environmental assessments.	Yes	Revised draft WRMP24 Environmental Report, Section 4
43	Historic England	P3 We welcome the reference to the Historic England Advice Note in relation to Sustainability Appraisal and Strategic Environmental Assessment	We thank Historic England for their support of the inclusion of Historic England advice within the sustainability appraisal and strategic environmental assessment.	No	N/A
44	Historic England	P13 3.3.3 We welcome the reference to adjustments to SEA Objective 18 in response to our comments.	We thank Historic England for their support of adjustments made to SEA Objective 18.	No	N/A
45	Historic England	P12 We welcome the reference to mitigating potential impacts on the historic environment and heritage assets including both designated and non-designated heritage assets. However, we are disappointed that elsewhere in the environmental assessment for example non designated heritage assets are not considered.	Non-designated assets have not been included within the plan-level environmental assessment due to the strategic high-level approach taken. At the option development stage other datasets, including those for non-designated heritage assets will be included. This encompasses datasets such as Historic Environment Records, Conservation Areas/Appraisals/Management Plans, Local Lists, Heritage at Risk Registers, World Heritage Site Management Plans and, where appropriate, further desk-based research. This approach will include assessment of the significance of these heritage assets and the contribution setting makes to this significance. This will allow for the consideration of mitigation through design and enhancement measures to ensure any harm to the significance of these heritage assets is avoided where possible.	No	N/A
46	Historic England	P15 We welcome the SEA objectives and questions for the historic environment. Here non-designated heritage assets are mentioned though it is our understanding that the assessment itself does not consider non-designated heritage assets.	We thank Historic England's advice on SEA Objective 18, and although it is noted here about non-designated assets, as outlined above, this is in reference to the development of options on an individual basis.	No	N/A

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47	Historic England	P24 We welcome the reference to designated heritage assets. We also welcome reference to unidentified heritage assets and archaeological remains. We suggest you amend this to non-designated and unidentified... This will capture any non-designated heritage assets (e.g. on a Local List) as well as any not yet identified/currently unknown.	We welcome the advice from Historic England to include the terminology, unidentified heritage assets. This has been updated within the Environmental Report.	Yes	Revised draft WRMP24 Environmental Report, Section 3
48	Historic England	P26 We are pleased to see reference to the historic environment in the Environmental Protection Objectives and Opportunities. It would be helpful to give some examples somewhere in the report of ways in which the Regional Plan may provide opportunities to protect archaeology and heritage assets.	Within the WRMP Environmental Report the environmental protection objectives and opportunities remain the same for the Historic Environment. The opportunities to protect archaeology and heritage assets through the Regional Plan have not been presented within the WRMP, however, the environmental assessment methodology for the Integrated Environmental Assessment conducted by the Regional plan is aligned to our methodology, therefore any opportunities identified within the WRMP are reflected in the Regional Plan.	No	N/A
49	Historic England	P29 - Table 4.2 states that Conservation Areas have been considered (although p97 states the opposite). The document should be clear about what has and has not been considered. We note that only designated, not non-designated heritage has been included in the high-level screening, which is disappointing.	Since the draft WRMP, the inclusion of Conservation Areas has been clarified, they are included within the cumulative effects assessments.	Yes	Revised draft WRMP24 Environmental Report, Section 8
50	Historic England	P47 - Table 5.1 The table identifies 3 projects with moderate / major negative SEA effects including Cambs and West Suffolk to Cambridge Water Co potable transfer, Fens Reservoir and South Lincs Reservoir. Many of the other proposals identify neutral effects on the Historic Environment. However, it is our view that some of the other schemes outlined in the Plan may also have moderate or major negative effects that have not yet been identified in this assessment and therefore we have some concerns in relation to the assessment. However, it is difficult to confirm this when the Plan is not clear about the geographical location of the proposals.	Since the draft WRMP, the SEA has been restructured to present a clearer narrative on the potential effects the plan as a whole has on the historic environment. We understand the concerns raised by Historic England on the lack of geographical locations of proposals, however, as we are currently at a strategic plan-level this detail is not available at this time. Once options are developed at a project level, we will engage with Historic England to discuss the further detail we have on the locations.	Yes	Revised draft WRMP24 Environmental Report, Section 6
51	Historic England	P76 this table identifies the distances used in the assessment of cumulative effects. 20 metres for listed buildings is very minimal and does not take into account the potential for impacts on setting. We had specifically advised against a purely distance based approach to impacts and also advised of the need for consideration of heritage assets. Therefore, the approach adopted here is disappointing. Impact on setting need to be considered carefully (i.e. to include more than just visual impacts and to consider impacts over wide geographical areas) as well as impacts on archaeological sites (including the effects of dewatering on archaeological deposits).	We welcome Historic England's feedback on the distance used; within the revised draft WRMP24 the distance has been updated to 500m.	Yes	Revised draft WRMP24 Environmental Report, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
52	Historic England	P97 para 7.3.67 states that Conservation Areas and non-designated heritage assets have not been considered at this stage. We would strongly advise that Conservation Areas (which are designated heritage assets) are considered at this stage. We appreciate that you have decided not to consider non-designated heritage assets at this stage, but we repeat our earlier advice that non-designated assets should be considered at an early stage.	Following the consultation feedback to include conservation areas, these have now been included in the GIS and have fed into the cumulative effect assessment.	Yes	Revised draft WRMP24 Environmental Report, Section 8
53	Historic England	P97 We recommend that groundwater levels should also be considered in cumulative effects. Groundwater levels have important implications for archaeology.	Following the consultation feedback to consider groundwater levels, these have now been included in the revised draft WRMP24 WFD sub-report.	Yes	Revised draft WRMP24 WFD Sub-report
54	Historic England	P121 The assessment indicates there will be intra-cumulative impacts of a Grade II* RPG and setting of 3 scheduled monuments. It would be helpful if the asset number/more detailed location was included in the table. Moreover, it is our view that there are likely to be other cumulative impacts such as changes to groundwater and the consequent implications for preservation conditions.	As the revised draft WRMP24 has an updated BVP, the revised draft WRMP24 cumulative effects for the historic environment can be read in the revised draft WRMP24 Environmental Report.	Yes	Revised draft WRMP24 Environmental Report, Section 8
55	Historic England	P137 Table 8.1 - The mitigation measures proposed in this table for the historic environment, although helpful, seem to focus mainly on the reservoirs. However, there will be other heritage impacts from other proposals which should also be considered in this assessment.	Following the consultation feedback on mitigation measures within the draft WRMP24 Table 8.1, further detail has been added in the revised draft WRMP24 for the historic environment. These mitigation measures are for all supply-side options, not just reservoirs. It should be noted that once options are developed at a project level, mitigation will be developed further.	Yes	Revised draft WRMP24 Environmental Report, Section 9
56	Historic England	Figure A.6 shows heritage assets. However, there do not appear to be any conservation areas shown on the plan. Is there a reason for this?	Within the revised draft WRMP24 Environment Report, conservation areas have been added into the cumulative impact assessment.	Yes	Revised draft WRMP24 Environmental Report, Section 8
57	Historic England	**Conclusions** We welcome Anglian Water's stated aim of protecting and improving our environment and welcome the many references in the Plan to this approach. Whilst we welcome the focus on the environment in the Plan, we consider this should be widened beyond the natural environment to also include the historic environment. It is our view that the impacts on the historic environment are not currently properly reflected in the Plan and supporting documents. We have highlighted some of the designated heritage that may be impacted by proposals in the Plan. However, the lack of site-specific information has made this very difficult in some cases. We would welcome more detailed discussion in relation to sites and potential impacts.	We welcome Historic England's feedback on the plan. We feel that there is an appropriate level of focus on the historic environment through the use of the SEA Objective and associated assessment. In addition, as this is a water resources management plan, there is a more direct relationship with the natural (water related) environment than the historic environment, which is due to the WRMP itself focussing on provision of water resources for our customers. We thank Historic England for the information shared on the designated heritage that may be impacted by proposals in the Plan. Once we begin to progress options individually at a project-level, we will engage with Historic England.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		In relation to the SEA we have some concerns about the extent to which some of the projects have been assessment for historic environment impacts, the parameters of assessments (e.g. 20 m for listed buildings is insufficient), the lack of consideration of Conservation Areas which are considered designated heritage assets in policy terms, as well as non-designated heritage assets. More assessment is needed even at this early stage to inform decisions about site selection. Further analysis of impacts on heritage would be welcomed. Historic England strongly advises that the local authority conservation teams and archaeological advisors are closely involved throughout the preparation of the assessment of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER- formerly Sites and Monuments Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.	Following the consultation feedback from Historic England on the parameters of assessments, the zone of influence has been updated to 500m. and conservation areas have been considered within the cumulative effects assessment. We welcome Historic England's advice to engage with local authority conservation teams and archaeological advisors, we will engage with these teams when options are being progressed individually at a project-level.		

2.29 Inland Waterways Association

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Inland Waterways Association	IWA supports the use of restored canals and new waterways for open water transfer (such as is being considered for the Bedford- Milton Keynes Transfer). We encourage water resources planners to consider the much broader, long-term environmental, societal and economic benefits waterways can provide. These benefits include: - Increased spend in the local economy: A 2011 report for Defra "The Value of Inland Waterways. Final Report", Jacobs/Inland Waterways Advisory Council, 2011] found that each mile of inland waterway contributes between £175,000 and £1,175,000 a year to the local economy. - Improved health and wellbeing: Waterways can open up multiple opportunities for outdoor activities such as walking, running, cycling, fishing, sailing, canoeing, paddleboarding and volunteering. - Protecting and improving the natural environment: Waterways are blue-green corridors that allow opportunities for reconnecting disparate habitats, biodiversity net gain and improvements for wildlife. - Connecting communities: Access to the paths that run alongside our waterways is free. These inclusive, flat, linear routes can be used as active travel corridors to connect communities and provide passage between urban and rural areas.	Open water transfers are being explored as part of the SRO design and solution.	No	SRO Gate 2 or/and reservoir websites
2	Inland Waterways Association	However, there are a number of issues which do need to be considered when combining water transfer with navigation. These also apply to schemes using existing navigations (such as the Grand Union Water Transfer scheme). The issues to be considered are: -Flow rates: Increased flow could cause some issues in tunnels and narrows such as aqueducts and bridges. Needs to be monitored and controlled. Air-draft / level changes: These could impact navigation in tunnels and other structures such as bridges, leading to craft and infrastructure damage. Needs to be monitored and controlled. Priorities during times of high demand - would priority be for water transfer or navigation? It is not clear from the plans. Responsibilities for operation and maintenance of both new and existing structures. eg If the flow causes a bridge abutment to erode who is liable for the rebuild cost? By-wash positioning: Will there be room to build by-washes around all the locks that will need them? They need to be positioned in such a way as to avoid making navigation unsafe due to flow rates.	Open water transfers are being explored as part of the SRO design and solution.	No	SRO Gate 2 or/and reservoir websites

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		Pump failure: This could have negative impact on levels unless tightly controlled with fail-safes built in.			

2.30 Ipswich Borough Council

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
1	Ipswich Borough Council	Anglian Water chief executive Peter Simpson has faced criticism after receiving a "substantial" £337,651 bonus as part of a £1.3m salary package. Given the amount of investment required for water supply provision, this does not bode well with the public in terms of these bonuses and salary levels.	We note the comment but do not believe this is relevant to our WRMP planning process.	No	N/A
2	Ipswich Borough Council	**Response to consultation question one** Climate change pressures mean that Suffolk is getting drier and also where there is rain it comes in shorter bursts with a higher velocity. Although there is potential in the future for associated wildlife habitat with reservoirs, there is also potential for evaporation and social/economic and environmental impact through loss of farmland/habitat at the sites for reservoirs. For example, one of the proposals lies in the Fens. Water re-use should also be included higher up the agenda for supply interventions. Desalination plants are currently expensive, inefficient and not sustainable.	Our preferred plan includes a water reuse option in Colchester to be developed at the start of the plan. This, along with other schemes to maximise output from our existing water treatment works, will enable us to cap all of our time limited licences to recent actual annual average and over half of our permanent abstraction licences by 2032, ahead of the Fens Reservoir which is required to enable capping of the remaining permanent licences.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 12
3	Ipswich Borough Council	**Response to consultation question two** Water re-use should move up the hierarchy and be used alongside reservoirs for the reasons set out above.	Our preferred plan includes a water reuse option in Colchester to be developed at the start of the plan. This, along with other schemes to maximise output from our existing water treatment works, will enable us to cap all of our time limited licences to recent actual annual average and over half of our permanent abstraction licences by 2032, ahead of the Fens reservoir which is required to enable capping of the remaining permanent licences.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 12
4	Ipswich Borough Council	**Response to consultation question three** In theory promoting long lead time solutions and phasing abstraction reductions is supported and transfers will definitely be required in the shorter term but such measures for reservoirs need to ensure there is not significant impact on habitats and the environment during the development phase of such schemes which will require HRA assessment.	As part of the revised draft WRMP24, a plan-level HRA has been applied to the BVP and alternative plans (Plans A, C and D). Once at a project level, a HRA assessment will be completed for the individual option being progressed.	Yes	Revised draft WRMP24 HRA Sub-report
5	Ipswich Borough Council	**Response to consultation question four** To make compulsory metering work, there needs to be reassurances about leakage levels so that households don't get caught up in their bills regarding leakage not related to their use. In addition, there is a need for more responsive reporting systems regarding leaks, as the longer leaks pursue,	We agree with the points made and would reiterate that smart metering is fundamental in supporting our water efficiency and behavioural change activities, through the provision of real time consumption data for both our customers and ourselves. We intend to build on our current progress in developing our water efficiency communications strategy, as part of revised draft WRMP24. Data is being provided on a daily basis to customers through a dedicated website and 'customer portal' and we intend to develop these communication channels further over the WRMP24 planning period.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
		the more water is wasted. Compulsory metering is supported but those with babies and young children and those with particular water needs linked to health issues should receive some form of financial or other support. Standard Water metering in the Anglian Water WRMP is around 90% so what is the make up of those who are not metered and why needs to be identified. Poverty is a factor we should also consider. For example: Large families on low wages would surely find a meter yet another financial burden - unless there is a guarantee that they would not pay more than they would under water rates. A SMART water meter approach would also be helpful to understand water usage better to help manage demand. The supportive technology offered to households and water advice via appointment is also very helpful. Re-use of cistern water for hand washing is quite routine in Japan and similar measures for re-use should also be encouraged and mainstreamed. Re-use should be developed alongside the reservoir approach.	Smart metering is also enabling significant benefits for leakage reduction through the more efficient and timely identification of both 'plumbing loss' and customer supply side leaks. The identification of leakage will inform our home visits, adding significant value to our water efficiency activities. We are committed to supporting our customers with information, so they can understand their water usage and so that we can identify leaks so they can be fixed as fast as possible (saving water for the customer and reducing leakage and demand). As described we are also looking at all methods of effecting water efficiency including water re-use and will be trialling options through our 'Demand reduction discovery fund'. We are very mindful, with regard to considerations concerning our vulnerable customers, and currently operate a number of tariffs to assist these customers. In developing our demand management strategy we have included a number of options to assist and incentivise vulnerable customers with fixing both internal and external leaks.		

2.31 Julia Lopez MP

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Julia Lopez MP	**Response to consultation question one** I do support the prioritisation of reservoirs over desalination in particular, given the energy use involved in desalinating salt water. If the two new reservoirs planned in the Fens and in South Lincolnshire are expected to be the 'low-regret' options and provide full benefit should the future climatic scenario differ to what Anglian Water expects, then I am supportive of them. I would, however, welcome further consideration of other supply-side options including water reuse given this was the other option which Anglian Water suggested had significant customer support.	We welcome the respondent's support. Our preferred plan includes a water reuse option in Colchester to be developed at the start of the plan. This, along with other schemes to maximise output from our existing water treatment works, will enable us to cap all of our time limited licences to recent actual annual average and over half of our permanent abstraction licences by 2032, ahead of the Fens reservoir which is required to enable capping of the remaining permanent licences.	Yes	Revised draft WRMP24 Decision Making technical supporting document, Section 12
2	Julie Lopez MP	**Response to consultation question two** I welcome Anglian Water's three tired approach given it will ensure bill impacts are as low as possible. I also believe the approach reflects the feedback given by customers, particularly on water reuse. I do not think it wise for Anglian to pursue only one of these strategies, in case the situation changes which would mean that one approach's impact lessens and therefore the other approaches become even more important. I also welcome the focus on demand management to promote water efficiency and to incentivise reductions in water usage, noting that this approach has allowed Anglian Water to serve more customers since privatisation without having to add additional supply.	We thank the respondent for their support.	No	N/A
3	Julie Lopez MP	**Response to consultation question three** I agree with Anglian Water's decision to only consider mass desalination much longer down the line, given that it is hard to estimate now how many desalination plants may be necessary, if at all. As stated above, I agree with the prioritisation of two new reservoirs and water reuse to reduce abstraction from water sources sustainably.	We thank the respondent for their support.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
4	Julie Lopez MP	**Response to consultation question four** I would not support compulsory water metering until Anglian Water has taken steps to significantly reduce water leakage in their own network. Should this particular proposal go ahead, I would like to see Anglian Water provide extensive support and advice to households who may have to use a lot of water for medical reasons or other reasons and be given a grace period to reduce their water usage whilst they get used to having water meters.	For our WRMP24 demand reduction programme we have adopted our most ambitious programme of leakage reduction with the aim of achieving a leakage level of 10% of demand lost as leakage. This will take significant investment, given that we currently have a distribution system of over 38,000km of mains. Additionally we need to maintain a constant activity to maintain any given leakage level (due to leakage break-out) and this gets harder as we need to find and fix smaller and smaller leaks. In parallel with this process, we are now using smart meters to identify continuous night flow (most likely leakage), so that we can inform our customers and assist them to fix their leakage (and save money). With regard to compulsory metering, we have consulted with a number of our vulnerable customers to understand and try to alleviate their concerns. We understand that there are particular groups of customers, who might be impacted, and we are keen to help them as much as possible through any transition period. We do currently have a number of tariffs designed to help our most vulnerable customers and we will work to ensure that these will be developed further in parallel with any compulsory programme.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 4, 6 and 8

2.32 Maldon District Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Maldon District Council	**Response to consultation question one** The Council supports the prioritisation of reservoirs, as opposed to water re-use and desalination, as they can provide a steady water supply that can be managed with more certainty, particularly given East Anglia is one of the driest areas. It is acknowledged that reservoirs are a good long-term solution to providing water supply, that require relatively low maintenance when up and running, compared to other options. As noted in the WRMP24, they also have other benefits such as biodiversity net gain, flood protection, amenity/tourism, community benefits and nature-based climate mitigation methods. There is also the opportunity to harness hydroelectric power in the future.	We thank the Council for its support.	No	Revised draft WRMP24 Our Water Resources Management Plan 2024
2	Maldon District Council	The Council strongly supports climate mitigation methods as well as any approaches that enhance the natural environment and provide community benefits. It must be ensured that sufficient water treatment works/upgrades to the existing works, are provided to account for two new reservoirs; it is noted an extension to the water treatments works in Lincolnshire is planned.	We thank the Council for its support.	No	N/A
3	Maldon District Council	It is noted that both water reuse and desalination have a more intensive upkeep than reservoirs. In addition, water reuse and desalination are costly energy-intensive processes. Whilst they are important in providing water supply, we should look to reduce reliance on these in the future, particularly due to energy costs/supply issues, and the impact on the climate. Regarding desalination, as mentioned in the WRMP, there are environmental impacts including high energy consumption and pollution issues. If this method of water supply is to be used, efforts must be made to mitigate these impacts and ensure the process is sustainable.	All of our WRMP supply side options undergo carbon emissions impact assessments and rigorous environmental assessment. At this moment in time, the widely accepted and understood industry standard means of desalination is Reverse Osmosis. While there are developments in the field, in reality this technology is nearing its optimal performance ability and there are not going to be large improvements made in energy efficiency - for example, new 'batch technologies' are looking to improve energy efficiency by around 5%. There may be new technologies in the future, and when they arise we want to be at the forefront, but in the meantime we have to look at best use of the technology available to us now. We will working closely with academic institutions to look at brine management strategies, to reduce the volume, concentration and impact of brine discharges. We will seek opportunities for mineral recovery, alternative uses and salt wetland habitat creation. We are also working with expert consultants and water companies from around the world that are successfully building and operating desalination to learn best practice so we can implement the technology the right way, from day one. By looking to collaborate with other sectors such as hydrogen production and offshore wind, we feel confident we can manage the long term carbon impacts of this technology.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
4	Maldon District Council	**Response to consultation question two** The Council supports this approach. Demand management, particularly reducing leakages and optimising water efficiency is equally as important as supply-side options, benefitting both Anglian Water as the supplier as well as the customers. Prioritising reservoirs is supported, as outlined in the response to question 1.	We thank the Council for its support.	No	N/A
5	Maldon District Council	**Response to consultation question three** The Council supports the prioritisation of reservoirs, as outlined in the response to question 1. The use of water transfer over abstraction is also supported, due to the lesser impact on the environment.	We thank the Council for its support.	No	N/A
6	Maldon District Council	**Response to consultation question four** Whilst the Council would encourage increased education, awareness and choice over compulsory actions, the benefits of compulsory metering are acknowledged. Customers could be offered the option to delay switching to use the meter, for example, have the meter for a year whilst they get used to it and the new costs, before switching to it permanently.	As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. This is detail in our 'Demand management preferred plan technical supporting document'. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We currently already have a number of tariff options to assist these customers and would be keen to ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups and will ensure that our compulsory metering programme will be introduced with sensitivity for all our customers.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 4, 7, 8 and 10 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 7

2.33 MGPH Ltd

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	MGPH Ltd	**Response to consultation questions one and three** The energy required in desalination makes this process unsustainable unless waste heat is used in the process (e.g. co-location with nuclear or energy from waste facilities) however without significant investment in water transmission systems this does not benefit large parts of the country. Demand-reduction is preferred over supply-side solutions but in the case of depleted groundwater resources risking our existing habitats, including rare chalk stream habitats, which is a very real risk in Greater Cambridge, then a carefully considered reservoir with fully mitigated environmental impact and enhanced social and amenity value is an acceptable solution. Improved water transmission between water-stressed and non-water stressed regions including bulk water supplies between Anglian Water and Cambridge Water are also fully acceptable. However we very strongly believe that water and sewerage undertakers (including embedded network operators acting under an Ofwat appointed NAV) should test the viability of adoptable district and community scale water re-use systems upon application from a developer. Where adoptable community-scale water re-use systems prove viable, these should be pursued, and should take priority over more-expensive and less valuable building integrated rain water harvesting (RWH) / grey water recycling (GWR) systems.	We appreciate your comments with regard to supply side options (some of which are in progress, such as our Strategic Pipeline from Lincolnshire to Essex) and demand management. We are currently planning to include our most ambitious plan for demand management in our WRMP24, building upon our current roll-out of smart meters (1.1 million by 2025). We are also currently investigating the potential for water re-use and liaising with Retailers and their customers, as to where this might be a viable option. We intend to conduct further trials, as part of our Water reduction discovery fund'. We would look forward to having further discussions with regard to this as we develop our plans further.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 10
2	MGPH Ltd	**Response to consultation question two** We believe that demand-side solutions including demand management should be a priority over supply-side solutions. However, we recognise that water re-use sits between demand and supply and should take priority over new supply solutions where these are viable.	We thank Marshall for its support.	No	N/A

2.34 MOSL

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	MOSL	**Overview of Companies' Draft WRMPs** Having reviewed all water companies' draft plans and the best-value regional plans, we do not believe that they are currently considering the needs and potential of the NHH market sufficiently. We are pleased to see a high level of ambition around the roll out of smart meters to NHH customers in your draft WRMP, but were unable to find a specific commitment around the number of NHH meters you intend to deploy. We can also see you are developing options around NHH water efficiency. We would like to have more clarity on these commitments in advance of and as part of your final WRMP. Despite Defra's guidance to consider the NHH market in companies 'best value' plans, several WRMPs make minimal reference to the market in the main document. In some cases, important NHH information is found only as part of the appendices. Considering that the NHH market accounts for 30 per cent of water consumed in England, it is essential that key points are included in the main document - not only as business customers have a key role to play in supporting the industry meeting its demand reduction targets, but also because NHH customers' awareness of water security challenges remains low. We recognise that there are plenty of reasons to focus on the household market, and that Defra only confirmed last week the nine per cent water reduction target for NHHs by 2038. We also recognise that penalties and incentives for households currently dwarf those in the NHH market and that wholesalers no longer own the relationship with these customers.	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50 (approximately 10Ml/d per 5 year AMP period). Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners. In total, these options help us achieve approximately 8% reductions by 2037/28 and 15% by 2049/50, but these reductions can only be achieved relative to the non-household demand position (including growth). We do not, therefore, believe that, achieving the absolute levels of non-household demand reduction, from the 2019/20 base-line, should be included in the revised WRMP24 plan, as this represents a degree of uncertainty with respect to the implementation of the newly developed options, which would not be prudent. As we prepare for WRMP29, we will trial options and their implementation, and develop options further for our WRMP29 plan, as we gain more experience. On the basis of our consultation responses, we have included demand that might be associated with potential H2 production and carbon capture (approximately 60Ml/d by 2031/32). Note this demand is not included in our potable water output or DI and, therefore, is considered an export and not part of our current non-household demand target assessment.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Demand management preferred plan technical supporting document:, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
2	MOSL	**Maximising the Benefit of the NHH Market** As a market that consumes a third of the potable water in England and Wales - three billion litres per day - the NHH market can, and should be making a proportionate contribution to your water reduction targets. The second is structure. Just one per cent of NHH customers use half of the water in the market (three per cent use nearer 70 per cent - or 20 per cent of all consumption). Just 11,000 large meters and 152,000 medium-sized meters account for 72 per cent of consumption in the market. This represents a significant opportunity for water companies to address a large proportion of the market's water usage through a targeted programme of smart meter replacements or upgrades (AMI, AMR, smart loggers, etc.). Wholesalers that have rolled out smart meters to date have also identified around 25 per cent of the water being used by NHH customers is continuous flow - a large proportion of this could be leakage and/or wastage. I would like to remind you of the research MOSL commissioned from Artesia Consulting in 2022, which established a strong business case for rolling out smart metering to NHH customers at the same time as domestic customers. It also recommended companies without large-scale meter investment programmes would benefit from replacing or upgrading selected NHH customers' meters, particularly the largest customers and/or where businesses are in close proximity.	For Anglian Water, non-household consumption accounts for 27% of our total demand. As stated we have now started to develop and quantify a number of interventions, for water efficiency and leakage reduction, as described in our preferred plan. We are currently in the process of fully quantifying leakage in the non-household sector and now have an effective method of identifying this, with our full smart meter roll-out for the non-household sector. We intend to work with our Retail partners to incentivise leakage reduction measures in preparation for full option implementation in AMP8.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9
3	MOSL	One million of the smaller NHH customers are virtually indistinguishable from households in terms of the amount of water they consume, how they use water (toilets, sinks, etc.) and meter sizes. We recommend that wholesalers treat the smallest NHH customers effectively as households when it comes to meter replacement programmes, water conservation advice and devices in order to minimise operating costs and maximise the economies of scale.	Our non-household water efficiency options have been designed to reflect their respective consumption volumes. We intend to work with our Retail partners to deliver smart meter (high usage/continuous flow) water efficiency visits. This will be similar to the household 'drop20' water efficiency visit option, with similar targeted interventions (leaky loos, taps etc.) on a scaled basis, dependent upon the size of water consumption per property: - companies with a per property consumption similar to 300l/prop/d to be provided 1 no equivalent 'drop20' interventions. - companies with a PHC similar to 1500l/prop/day to be provided 3 no. equivalent 'drop20' interventions. - companies with a PHC similar to 5000l/prop/day to be provided 5 no. equivalent 'drop20' interventions.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9
4	MOSL	**What We Would Like to See in Companies' Final WRMPs** Ensuring references to 'customers' make it clear whether you are referring to households, NHHs or all customers.	We have ensured clear delineation between non-household and household demand elements and demand management options throughout the revised draft planning submission.	Yes	Revised draft WRMP24 Demand forecast technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
					Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document
5	MOSL	A clear statement regarding the recognition of the size and importance of the NHH market and the role it plays in delivering your WRMP, reducing water demand and wastage.	We have incorporated NHH savings into our WRMP. The importance, and volatility, of this sector has been made clear.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9
6	MOSL	Reference to Defra's nine per cent water reduction target for the NHH market by 2038 and your detailed plans for achieving this target.	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50 (approximately 10Ml/d per 5 year AMP period). Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9% and feasible target cohorts). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners. In total, these options help us achieve approximately 8% reductions by 2037/28 and 15% by 2049/50, but these reductions can only be achieved relative to the non-household demand position (including growth).	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			We do not, therefore, believe that, achieving the absolute levels of non-household demand reduction, from the 2019/20 base-line, should be included in the revised WRMP24 plan, as this represents a degree of uncertainty with respect to the implementation of the newly developed options, which would not be prudent. As we prepare for WRMP24, we will trial options and their implementation, and develop options further for our WRMP29 plan, as we gain more experience. On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). Note this demand is not included in our potable water output or DI and, therefore, is considered an export and not part of our current non-household demand target assessment.		
7	MOSL	Greater use of the research by MOSL and the Metering Committee to determine the business case for NHH smart metering and the benefits of making meter data available to retailers and customers.	As part of WRMP19 we successfully argued that smart metering is a key technology required in order to provide the crucial data required to drive behaviour change and identify leakage. We are currently progressing our roll-out of smart meters for both our household and non-household customers area by area, and will achieve full smart meter roll-out by 2029/30. Note that we currently have over 500K household smart meters and 16K non-household smart meters already installed (2022/23), as we progress our geographic roll-out. Also note that 99.5% of non-household customers are metered.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 6 and 9
8	MOSL	Clarity on the number of smart meters you intend to deploy in AMP8 and beyond - visibility for retailers on when they will be rolled out where will help avoid duplication of effort.	We are currently progressing our roll-out of smart meters for both our household and non-household customers area by area, and will achieve full smart meter roll-out by 2029/30. Note that we currently have over 500K household smart meters and 16K non-household smart meters already installed (2022/23), as we progress our geographic roll-out. Also note that 99.5% of non-household customers are metered. We expect that by 2025 approximately 60K non-household properties will be smart metered or have loggers installed and by 2030 this will be increased to 138K.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 6 and 9
9	MOSL	Where appropriate, cross-referencing the findings of other water companies smart meter rollouts to support smart meter proposals and the scale of water saving opportunities.	We are progressing an extensive smart meter roll-out programme (currently we have 600K smart meters installed with >16K business smart meters) and will be keen to share our findings on their effectiveness with other companies who are planning smart-meter programmes in AMP8. We have also been mindful of information shared by other water companies with experience of smart meter roll-out, in considering water saving options. At the moment both ourselves and Thames are leading the way with regard to the rollout (we now have over 600K smart meters installed covering both household and non-household properties).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6, 7,9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
10	MOSL	Explanation of how water efficiency services would be offered to different categories of NHH customers - multi-site, industrial customers, commercial/offices etc.	Our non-household water efficiency options have been designed to reflect business consumption volumes. We intend to work with our Retail partners to deliver smart meter (high usage/continuous flow) water efficiency visits. This will be similar to the household 'drop20' water efficiency visit option, with similar targeted interventions (leaky loos, taps etc.) on a scaled basis, dependent upon the size of water consumption per property: - companies with a per property consumption similar to 300l/prop/d to be provided 1 no equivalent 'drop20' interventions. - companies with a PHC similar to 1500l/prop/day to be provided 3 no. equivalent 'drop20' interventions. - companies with a PHC similar to 5000l/prop/day to be provided 5 no. equivalent 'drop20' interventions. These will translate into 'Simple small customer', 'Complex medium customer' and 'Large very complex customer' visits/audits and retrofit processes. Additionally we have considered the complexity of the type of business in terms of their water usage (similar to household consumption, industrial process etc.). This will inform the type and scale of water efficiency that would be required. We intend to work closely with our Retail partners in developing this strategy.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9
11	MOSL	Explanation of how you plan to work with retailers collaboratively to engage with customers to reduce water consumption and carry out water efficiency interventions.	As part of the revised draft WRMP24 demand management option development process, and in conjunction with our WRE partners, we have engaged with our regional Retailers and business customers, in order to gauge opinion on further water efficiency measures for the business sector. This recent engagement (in association with WRE and 'Blue Marble') has been conducted to understand the retailer perspective regarding the promotion of water efficiency; to develop and refine propositions and understand and overcome barriers; to explore these propositions and how they might be implemented with retailers and non-household customers. We are currently liaising with several Retailers in order to trial some of the options we have co-developed through the engagement process and will continue to investigate how best to funding AMP8 initiatives, accepting that Retailers play the key role in liaising with their customers on water efficiency matters.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6
12	MOSL	Exploration of how you plan to work with retailers to avoid denial of PR24 outperformance payments- e.g., a pain/gain sharing mechanism or incentives for retailer water efficiency offerings.	As we co-develop demand management options with our Retail partners we will seek dialogue with regard to the penalty/reward framework currently being instituted by Ofwat, and how this should be fairly attributed.	N/A	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
13	MOSL	A country-wide approach to demand reduction, regardless of whether water company regions are designated as being 'water stressed' or not, recognising all areas have local demand challenges.	We agree that all areas have challenges, although it must be acknowledged that some areas are facing more acute challenges than others, and approaches have to be tailored accordingly. We have worked with WRE and regional water companies to align strategies for demand management as far as possible.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

2.35 National Trust

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	National Trust	**General points** The Trust supports spatial planning and environmental management that takes a holistic and plan-led approach. This includes planning for the long-term, looking at the landscape or catchment scale, and considering the implications for climate change, landscape, heritage and nature. The Trust expects that the final WRMP would incorporate an environmentally responsible and sustainable approach to development, with clear SMART aims and objectives;	We welcome the National Trust's support for the holisitc and plan-led approach for spatial planning and environmental management. Within our revised draft Environmental Report more can be read on the environmental considerations and approach within our Strategic Environmental Assessment Framework for the plan.	No	N/A
2	National Trust	The company should use mitigation hierarchy in all aspects of planning and programming - e.g. leakages of water resources to be addressed prior to new development of assets;	Our preferred plan is based on a three tier strategy where we prioritise making best use of existing resources, through demand management and upgrades to existing water treatment works before developing new strategic water resource options (two new reservoirs) and adaptive future resources sized to meet the need.	No	Revised draft WRMP24 Decision making technical supporting document, Section 12
3	National Trust	AWS should develop strategic/regional level drought resilience measures in parallel with the new infrastructure programme	Increased drought resilience is integral to our preferred plan. The schemes within the plan enable us to increase our resilience to more severe droughts (1:500) by 2040.	No	Revised draft WRMP24 Decision making technical supporting document, Section 5
4	National Trust	There should be a clear communication and education strategy on management of demand.	Our water efficiency and communication team are currently engaged in developing strategies to communicate our water resource position and help to educate our customers on the need for water efficiency. We understand that our customers will need to participate in a cultural change with regard to the value that we all must place on sustainable consumption in the future. We also recognise that our customers have a variety of viewpoints and perspectives and that we will need to tailor our messaging appropriately. The success of smart metering will also be directly related to our water efficiency activities. We understand that smart metering is a technological revolution and it needs to be accompanied by a behavioural revolution to unlock its full potential to help manage demand. We are excited by the opportunities that the provision of timely consumption data from smart metering is having on our ability to change consumer behaviour and to promote the conservation of water. As part of our demand management strategy we are currently developing communications strategies that can be directly tied to consumption data, giving both household and non-household customers insight into their	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			water usage. These communications will focus on consumption, but will also be key to providing context for all consumers, as to why water efficiency is so important for both themselves and the wider environment. As we develop these strategies, we will be keen to consult and collaborate on how coordinated messages might deliver further benefits.		
5	National Trust	There needs to be a commitment to full and effective engagement and communication with all stakeholders that may be affected.	We are committed to transparent engagement with stakeholders that may be affected by our proposals.	No	N/A
6	National Trust	**Future consultation** It is difficult to understand the exact locations of any proposed new infrastructure. The plan covers a large part of the National Trust's Midlands and East of England Region. There may be areas of National Trust land (or land subject to covenants) potentially affected by any stage of the overarching dWRMP options that have not been specifically identified, due to the absence of specific asset details and locations in the dWRMP, and/or due to the necessary optionality that such a long-term plan necessitates. The Trust would welcome further engagement on Anglian Water's draft WRMP24 prior to its finalisation.	Due to security considerations we are unable to produce detailed maps of the locations of our planned investments. The project details within the plans are of a high level; we would expect refinements when they move into the delivery process so would not typically engage with landowners until we had some surety of our plans. We will continue to include the National Trust in our engagement plans.	No	N/A

2.36 Natural England

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Natural England	**1.1 Overaching comments** 1. Whilst appreciating the complexity of Anglian Water's (AW) supply it is difficult to clearly understand the plan and the rationale for decisions made with information being spread over multiple documents with no single clear narrative for each decision. 2. We recognise at a strategic level the plan is likely to be the core of what is necessary to meet supply demand balance and environmental requirements in time. a. We support the work AW have done in reconciling supply demand balance and environmental obligations but notable delivery risks remain. b. However, there is a lack of clarity and assessment of the impacts of decisions made within the plan c. There is a lack of certainty around key aspects of the plan 3. This prevents us being able to reach a view on the environmental implications of plan at this time. So we would appreciate clarity on the points raised in order to reach a view. Should this not be possible Natural England may need to object to the plan.	We have aimed to make the revised draft WRMP24 Main report and environmental assessments clearer, with the decisions captured in the Main report. This Main report also shows the impacts of such decisions over the 25 year planning cycle. We also acknowledge there is `uncertainty with delivery of the plan, and have included further adaptive pathways so that we are ready to respond to risks in a timely manner.	Yes	Revised draft WRMP24 Main Report
2	Natural England	**1.2 Assessments of decisions within the plan** 1. Decisions, as opposed to physical options, in the plan haven't had an environmental assessment	We have taken this response into account for revised draft WRMP24, drawing together the information on the influence of environmental assessment on WRMP plan-making, including of the policy decisions of the plan. Within this revised draft WRMP24 there is discussion of the assessment of demand management, licence capping, drought resilience and environmental destination.	Yes	Revised draft WRMP24 Environmental Report, Section 5
3	Natural England	a. Environmental report Table 4.1 states environmental assessments are for the plan as a whole, as do all the relevant guidance (see Annex 2)	Within the revised draft WRMP24 Environmental Report, a more holistic approach has been used which has seen the plan being assessed as a whole. This includes assessing demand management, licence capping, drought resilience and environmental destination.	Yes	Revised draft WRMP24 Environmental Report, Sections 5, 6 and 7
4	Natural England	b. Key decisions with potential environmental impacts are around delaying returns to the environment until after 2030 , delays to licence caps and caps to max historic and demand management and delivery risks	This is noted and within the revised draft Environmental Report we have used the SEA Framework to assess the potential environmental impacts of policy decisions made by the plan (delaying licence caps, demand management, drought resilience, and environmental destination). In terms of the delivery risks, the adaptive pathways present the different delivery risks and these have also been assessed through the SEA Framework.	Yes	Revised draft WRMP24 Environmental Report, Sections 5 and 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
5	Natural England	c. There is no clear description within the plan of what, if any, water will be returned to the environment or whether there will be any increased abstraction, even within current licenced volumes and hence we cannot reach a view on the plan without greater clarity on this issue	Our initial most likely scenario incorporates time limited licences reduced to average recent actual by 2030, all other permanent licences by 2036 (scenario 4). In response to stakeholder feedback we have developed a bespoke scenario to bring forward permanent licence caps such that all available resource is fully utilised. Starting with scenario 4 we identified surplus resource that could be fully utilised by bringing forward some of the permanent licence caps (to before 2036) without triggering the need to develop additional schemes (such as desalination) at the start of the plan. We have also prioritised environmental destination reductions over drought resilience, by moving the drought in Ruthamford back to 2040. This creates a 15Ml/d surplus in 2036 which can be used to deliver earlier environmental destination reductions in our most sensitive catchments. Our demand management strategy sets out how we will reduce demand in order to avoid increasing abstraction from current licenced volumes.	Yes	Revised draft WRMP24 Decision Making technical supporting document, Sections 5 and Section 6, and Annex
6	Natural England	**1.3 Growth and Demand Management** 1. It is unclear how growth, demand management and licence caps align in time and space and there's no assessment of the environmental implications of this and hence we cannot reach a view on the plan without greater clarity on this issue	We have produced an infographic which sets out how our supply and demand strategies align over time to resolve the baseline supply demand deficits across the region, including delivering of licence cap reductions to recent actual average and BAU+ Environmental destination.	Yes	Revised draft WRMP24 Main report, Executive Summary
7	Natural England	a. The WRMP guidelines state sustainability reductions must be in the baseline, so changes to the timing of sustainability reductions in Scenario 4 are a change from the agreed baseline, Scenario 6. This amounts to a substantive change, so we believe Scenario 4 should have an environmental assessment. i. This assessment should pay regard to whether the sources are ground or surface water	In response to the consultation feedback that Scenario 4 needs to be assessed, this have been included in the assessment of the plans. Plan A is based off Scenario 4 and Plans B, C and D are based off Scenario 8.	Yes	Revised draft WRMP24 Environmental Report, Sections 6 and 7
8	Natural England	b. We don't understand the rationale behind the views expressed in The Environmental Report (Section 5.3.2) and WFD 1.2 that demand management and WINEP options can't be assessed. There is a clear geographical delivery plan for smart meters and growth which form part of the Supply Demand Balance (SDB) for each WRZ. There may be less defined geography for some of these measures, but to have confidence we would need clarity on how the operation of AW's network avoids impacts. If this is the case it is therefore unclear how the specific delays to caps are needed or have been selected.	The revised draft WRMP24 Environmental Report have been updated to reflect the potential positive effects of demand management and WINEP options. In addition, our AMP8 WINEP Options have been included in our revised draft WFD assessment.	Yes	Revised draft WRMP24 Environmental Report, Sections 6 and 7 Revised draft WRMP24 WFD Sub-report

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
9	Natural England	c. The SDB in a WRZ depends in part on demand management. However if this does not happen as planned in a WRZ there will be a negative SDB and risk of over abstraction in that WRZ and so there is a critical need to assess this risk and implications.	We have shown how our demand management strategy will enable us to avoid the risk of over abstraction in our revised draft WRMP24 Decision making technical supporting document. Further detail of how demand will reduce at the more detailed planning zone scale is provided in the Annex being provided to the Environment Agency and Natural England. As part of our adaptive planning assessment we have described the actions we would take if our demand management strategy did not produce the expected benefits. We would bring forward desalination investments, but early in the planning period when we have limited feasible resource options there is a risk we would have to meet residual benefits with an adjustment to the timing of licence capping.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5
10	Natural England	d. We would be encouraged if a clear link were made to the information provided by NE for WINEP of the protected sites most at risk from hydrological change and the decisions around which licence caps to delay or limit to max historic.	We have presented information from Natural England on the protected SSSI sites and their proximity to our water supply abstraction locations, along with graphs showing how our demand management strategy will reduce abstraction over time in an Annex. Our prioritisation of areas for early delivery of licence caps and Environmental Destination has been informed by the relationship between our abstractions and sensitive sites.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6 Sustainability Reductions Annex
11	Natural England	2. There appears to be no “what if” scenario testing for lower demand management or delays or changes to SRO delivery times or volumes. With most WRZs having a zero SDB there appears little room for any deviation from the planned numbers.	Our revised draft WRMP24 Decision making technical supporting document describes a range of sensitivity tests that have been carried out to test the impact of lower demand management and changes to SRO delivery and volumes amongst other factors. This also describes how we would adapt our preferred plan to these factors and other potential scenarios.	Yes	Revised draft WRMP24 Decision making technical supporting document, Sections 7 and 10
12	Natural England	a. Sensitivity testing and how this plays into the timelines for delivering options would increase confidence in the plan to achieve its objectives.	Our revised draft WRMP24 Decision making technical supporting document describes a range of sensitivity tests that have been carried out to test the impact of lower demand management and changes to SRO delivery and volumes amongst other factors. We also describe how we would adapt our preferred plan to these factors and other potential scenarios.	Yes	Revised draft WRMP24 Decision making technical supporting document, Sections 7 and 10
13	Natural England	b. A clearer plan B and a description and timeline of the actions that will be taken to identify and address unplanned delays or reductions is needed to have confidence in the plan.	We have set out adaptive planning pathways describing the alternative approaches we would take in the event of the preferred option delivery and timings not being achieved as part of the our revised draft WRMP24 Decision making technical supporting document. This describes the actions we would take in the following scenarios: - Fens reservoir later than planned. We would bring forward our Bacton Desalination option which will be designed in AMP8.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			- Lincolnshire reservoirs delivered later than planned. We would need to adjust our timing to deliver Environmental Destination and explore enhanced demand management options. - Late delivery of Ruthamford South to Suffolk West and Cambs (via Cambridge Water) interconnector. We would require an adjustment to licence caps timings and explore the possibility of enhanced demand management. - Late delivery of interconnectors to Norfolk. We would require an OPI adjustment to licence caps timings and explore the possibility of enhanced demand management. - Marham abstraction is deemed infeasible. We would bring forward the Bacton Desalination option, require an OPI adjustment to licence caps timings and explore the possibility of enhanced demand management. - Suffolk West and Cambs groundwater is deemed infeasible. We would require an OPI adjustment to licence caps timings and explore the possibility of enhanced demand management.		
14	Natural England	c. We note that changes to levels of service or nitrate treatment for surface water are not in the plan to optimise use of existing licenced volumes and do not appear to have been assessed as an option prior to delaying licence caps or as a “plan B” should demand management not deliver as planned.	Levels of service benefits have been tested and discussed within the revised draft Supply forecast technical supporting document. Our North Lincolnshire Alternative options have identified an opportunity to groundwater reduce nitrate in order to increase DO (Option LNE 11) a 7.5 Ml/d increase in DO, which will be available by 2028. Option LNC30, to reduce organics, will increase the DO of Hall WTW by 7 Ml/d by 2030. This is now described in our revised draft Supply-side option development technical supporting document. During workshops with our operational colleagues we did not find any other similar situations where blending for nitrate, or other water quality parameters, was such a constraint that treatment would increase DO.	Yes	Revised draft Supply forecast technical supporting document, Section 8 Revised draft Supply-side option development technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
15	Natural England	**1.4 Use of capped licences and headroom** 1. The approach to water use in capped to historic licences and headroom isn't clear and how these licences will be operated is needed to determine any environmental effects. a. We would expect this to be in line with Figure 1 of the Water Resources Planning Guideline Supplementary Guidance, and no increase in average use and a commitment to this would be valuable. b. Clarity on how this will be managed and monitored is needed. c. This is critical as any plans to increase abstraction where there is a risk to the integrity of a European Site, even within licence, must be assessed under Habitats regulations. d. It would be beneficial to clarify which, if any, licence caps will result in actual returns of water to the environment and the source and location of this and so potentially contribute to environmental improvement	We have shown how our demand management strategy will enable us to avoid the risk of over abstraction in our revised draft WRMP24 Decision making technical supporting document. This demonstrates how the licence capping scenario 4 aligns with Figure 1 of the Water Resources Planning Guideline Supplementary Guidance, and reduces the risk of deterioration over time. This is achieved through demand management, and alternative sustainable supply side options. Further detail of how demand will reduce at the more detailed planning zone scale is provided in the Annex. We will monitor the effectiveness of our demand management strategy as part of adaptive planning and the WRMP Annual Review process. Our revised draft WRMP24 Demand management preferred plan technical supporting document describes the monitoring framework we have developed for the demand management options.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5 Sustainability Reductions Annex Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 13
16	Natural England	**1.5 Desalination** 1. There are no long term scenarios that don't ultimately require desalination and it appears the fastest deployable new supply mechanism. a. We recognise and welcome that AW have an adaptive planning programme that includes investigations, research and design if re-use or desalination schemes need to be brought forward. A clearer commitment to this development in the plan would be helpful to increase confidence around the unavoidable uncertainty. The current plan appears quite linear in this respect. b. Without concurrent development of adaptive pathways alternative options within them won't be in sufficiently advanced to be able to respond in time for changes in circumstances necessitating the adaptive pathway.	We have included further detail on our plans for progressing our knowledge of new supply-side options. This will ensure we are ready to move to an adaptive pathway if our monitoring highlights the plan is not delivering as expected.	Yes	Revised draft WRMP24 Supply-side option development technical supporting document, Section 4 Revised draft WRMP24 Decision making technical supporting document, Section 10
17	Natural England	2. We recognise the concerns around desalination with regard to energy consumption, and hence carbon, and the environmental implications from brine discharge. We also recognise that the levels of reduction in demand that would be needed to eliminate the need for this as a supply option are significantly greater than existing policy of 110l/h/d and so agree desalination is likely to have to be part of the supply mix without far greater overall water efficiency and demand management across all users.	We thank Natural England for its comments and agree that we should retain desalination as a credible supply option in the long term. In the interim we hope to work with Natural England and other stakeholders to enhance our understanding of this technology and its impacts and how we can best minimise and mitigate.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document, Sections 4 and Section 7, and Appendix A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
18	Natural England	a. We believe that with good advanced planning, investigation and design the carbon cost and risks around discharge impacts of desalination should be possible to reduce and mitigate adequately.	We thank Natural England for its comments and agree that we should retain desalination as a credible supply option in the long term. In the interim we hope to work with Natural England and other stakeholders to enhance our understanding of this technology and its impacts and how we can best minimise and mitigate.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document, Sections 4 and Section 7, and Appendix A
19	Natural England	b. We would be interested to see what level of demand management would be necessary to eliminate the need for desalination and risks outlined above. c. This may become relevant for project stage HRA for desalination if adverse effects can't be sufficiently ruled out	Our demand management strategy and the benefits of government-led demand interventions provide approximately 220 Ml/d of demand savings by the end of our forecast period in 2049/50 compared to the baseline forecast. Our preferred plan requires 100 Ml/d of Desalination capacity. Therefore we would require an additional 45% demand management savings to enable desalination to be ruled out. Currently our demand management strategy includes full smart metering, our maximum feasible leakage reduction (38%) along with non-household and water efficiency savings. We have also included a significant volume of reductions for government led interventions (84Ml/d). Significant uncertainty surrounds the realisation of these savings. Consequently, finding an additional 100Ml/d of demand reductions would appear to be very challenging, given current understanding.	No	N/A
20	Natural England	**1.6 Leakage** 1. Whilst recognising current leakage performance the proposed approach ensures the national targets will not be met unless delivery of over 50% has been secured by other water companies.	As part of our revised draft WRMP24, and in the light of our consultation, we have reviewed our leakage reduction programme. We have, consequently, included our maximum feasible leakage reduction programme, achieving a reduction of 38% (from the 2017/18 base-line) by 2050. This reduction is now more in alignment with the anticipated reductions from other water companies. Additionally it should be noted that if the 50% reduction for leakage is applied as a set of national attainment curves, Anglian Water will be below these targets by 2030 and very significantly below, by 2050. We are currently a frontier company for leakage, recording our lowest level of leakage in 2021/22. This means that more cost effective leakage reduction strategies have already been exhausted. We will, therefore, need to engage in significant mains replacement over the WRMP24 planning period (at a significant cost). This additional cost has been profiled to occur at later stages in the WRMP24 planning period, giving ample time to investigate technologies to mitigate and reduce the cost (due to mains replacement). We have discussed leakage targets with our neighbouring companies in WRE. However, it is not up to individual companies to assess the relevant contribution of other companies; this is a matter for companies and regulators to evaluate.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
21	Natural England	a. A clearer explanation demonstrating how the suggested approach offers the best outcome is needed to support this approach. Demonstration that additional demand management and other measures such as reduced run time can more effectively deliver equivalent savings.	As part of our revised draft WRMP24, and in the light of our consultation, we have reviewed our leakage reduction programme. We have, consequently, included our maximum feasible leakage reduction programme, achieving a reduction of 38% (from the 2017/18 base-line) by 2050. This reduction is now more in alignment with the anticipated reductions from other water companies. Additionally it should be noted that if the 50% reduction for leakage is applied as a set of national attainment curves, Anglian Water will be below these targets by 2030 and very significantly below, by 2050. We are currently a frontier company for leakage, recording our lowest level of leakage in 2021/22. This means that more cost effective leakage reduction strategies have already been exhausted. We will, therefore, need to engage in significant mains replacement over the WRMP24 planning period (at a significant cost). This additional cost has been profiled to occur at later stages in the WRMP24 planning period, giving ample time to investigate technologies to mitigate and reduce the cost (due to mains replacement). We however, consider that this increased ambition indicates our commitment to meeting the overall national target and intend to investigate technological advancements that should mitigate this cost as we prepare future plans	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 4
22	Natural England	b. A comparison with the cost of other measures to save or sustainably source equivalent volumes would be beneficial to understand this decision.	For demand management we have costs per Ml/d for the options that have been included in the plan. For our preferred plan we expect: - Smart metering to cost between £6M/Ml/d for AMP8 and £7M/Ml/d for the whole plan period (needed for the water efficiency options) - Water efficiency options to cost between 1.5M/Ml/d for AMP8 and £2M/Ml/d for the whole plan period - £0.5M/Ml/d for non-household water efficiency throughout the plan. and for leakage costs range from £5M/Ml/D for AMP8 up to > £100M/Ml/d for the entire plan (this is due to the volume of mains replacement included to reach the 38% leakage reduction). However, as noted we plan to review costs and benefits for the leakage reduction programme as we develop our future plans.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
23	Natural England	c. Assuming extensive pipe replacement is prohibitively expensive, reducing the current average run times appear to offer an alternative means of reducing leakage.	Our leakage reduction strategy will incorporate both these aspects of leakage reduction, in order to achieve the anticipated reduction by 2050 of 38%. We therefore intend to: - reduce customer supply pipe leakage run-times though both our smart metering programme, which allows the identification of continuous flows as soon as they occur - reduce run-times for our mains network using our active leakage investigation and control teams - reduce the number of leaks through our mains replacement programme. We have designed our strategy such that in the near term it will be driven by our smart meter roll-out (with a small amount of mains replacement in AMP8) and in the longer term by an extensive mains replacement programme (over 8000km of main). This will allow us to investigate alternative innovative technologies for leakage reduction and should help us to find ways of mitigating the significant long term costs associated with mains replacement.	Yes	Demand management preferred plan technical supporting document, Section 8 Demand management option appraisal technical supporting document, Section 4
24	Natural England	d. The roll out of full smart meters should therefore be accelerated and targeted at areas with greatest leakage losses and more to be done to reduce run times, 4 months until repair with smart meter, although an improvement from 7 months still seems very long and at odds with the stated notification times of 3 days. We recognise this is skewed by “long running” leaks, however if these skew leakage so much, increasing understanding and addressing long running leaks should be a priority to bring the average closer to the 28 day majority figure.	Our current intent is to install 1.1 million AMI smart meters by 2025 as part of our WRMP19 AM7 plan. This will account for approximately 50% of our current customer base. In parallel we intend to install AMI smart meters for non-household businesses. We currently have over 600K smart meters installed, with >16K non-household customers with smart meters (as of July 2023). We are also accelerating the installation of smart meters under the AID programme (Accelerated infrastructure delivery), bringing 60K smart meter installations forward into AMP7. We intend to complete our roll-out of 2 million smart meters by 2030 for both our household and non-household customers (excluding those with loggers already installed). Note that 99.5% of the business customers in the Anglian Water region are already metered and will be smart metered by 2030. The roll-out has been targeted to areas of water stress, in parallel with the smart network installation and is shown in our Demand management Preferred Plan Report. Note that the average run-times described in our initial plan reflect the fact that there were a number of very long running leaks in the trial area. Most leaks are fixed by the customer within 60 days. Our intention is to get all leaks fixed below a 100 day maximum, leading to an average of 59 days, but again the vast majority would actually be fixed in shorter times (given the non-standard distribution).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 3

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
25	Natural England	**1.7 Allowance for outcomes of the Judicial Review in the Broads** No allowance or contingency appears to be in the plan for any changes that may arise from the current work under the Judicial Review Order for the Broads. We understand AW is currently exploring options for this and would recommend this risk is incorporated into the plan.	Reductions in abstractions around the Broads have already been reduced as part of WRMP19. We have assumed a worst case scenario for our sources at Kirby Cane and Thorpe/Postwick in the revised draft WRMP24 Supply forecast.	Yes	Revised draft WRMP24 Supply forecast technical supporting document, Section 5
26	Natural England	**2.0 Habitats Regulations Assessment (HRA)** 1. We recognise and support the approach in the HRA for options for delivery in subsequent WRMPs of being clear where a conclusion that no Adverse Effect On Integrity (AEOI) can be reached due to current lack of scheme detail and investigation as this is in accordance with our advice. We however wish to make it clear that: a. This conclusion is not final and does not at this stage preclude the option being developed further. Final decision on Habitats Regulations conclusions will depend on timely, satisfactory scheme investigation and assessment b. The work needed to inform the options is vital and must continue at pace. c. A clear plan and timeline on the steps to be taken to gain the necessary information and design and mitigation detail should be included in the plan. Without this the credibility of delivery of future options on time is weakened	We appreciate Natural England supporting this approach. This conclusion is at plan-level and does not have any bearing on the scheme-level assessment. We are working on scheme-level assessments for active options including the SROs and will continue to liaise with Natural England and other stakeholders on this.	No	N/A
27	Natural England	2. At this stage options for delivery in this WRMP a conclusion of AEOI can't be achieved without further planning and investigation for NBR6 and EH5 with respect to Breckland Farmland SAC. This must be resolved within the final plan.	Following this consultation feedback, the transfer NBR6 has now been rerouted and is concluding no AEOI. Regarding the transfer NEH5, this option is no longer being selected in any of the four plans.	No	N/A
28	Natural England	**3.0 Strategic Environmental Assessment (SEA)** 1. River support schemes in the dWRMP don't appear to have considered the effects of the abstraction for the river support. The points around increases within licence in capping scenario also apply here a. The fundamental contradictory nature of river support - abstracting more water to mitigate for the effects of abstraction, is why river support should not be considered a long term sustainable option or an alternative to sustainable abstraction.	We have noted the concerns on river support and aim through the AMP8 WINEP Environmental Destination investigations to work with Natural England to develop other long term sustainable options.	No	N/A
29	Natural England	2. SEA mentions impacts with SSSI zones of influence but doesn't name these in all cases	The SSSIs within the Anglian Water region have been identified, and numbers summarised. Where effects have been identified on specific SSSIs, these have been named in the assessment chapters of the Environmental Report.	Yes	Revised draft WRMP24 Environmental Report, Appendix D

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
					Revised draft WRMP24 Environmental Report, Sections 6 and 7
30	Natural England	3. Mitigation in SEA (refining pipeline routes and/or trenchless techniques) will need to be fully delivered with any project and location specific actions in addition to standard best practice currently in SEA and HRA and agreed with regulators at project stage to avoid impacts on SSSIs.	We understand the importance of mitigation to avoid impacts on SSSIs and as options are progressed at a project-level, further work will be completed on mitigation for the specific option, in liaison with Natural England.	No	N/A
31	Natural England	We draw Anglian Water Services' attention to its duties under the SEA regulations for Protected Landscapes, the strengthened duties under the NERC Act, species recovery and protected species and Marine Conservation Zones (MCZs). See Annex 2 for more information.	We have noted Natural England's legislative and policy context for the advice to our WRMP24. This has been considered by our consultants who have completed the environmental assessments.	No	N/A
32	Natural England	**Water Framework Directive** Comments on WFD are a matter for the Environment Agency however Natural England notes: 1. Natural England's view is that failure of or increasing an existing failure of monitoring specifications (formerly called FCTS) for groundwater dependant SSSIs related to abstraction induced drying even if this is in combination with climatic drying would constitute a deterioration. 2. We would expect this to be considered in the WINEP investigation	We understand Natural England's view on WFD in relation to groundwater dependant SSSIs, which has been used to aid the prioritisation for sustainability reductions; our revised draft WRMP24 Decision making technical supporting document presents how this has been used.	Yes	Sustainable reductions annex
33	Natural England	**5.0 Environmental Destination** The dWRMP has also been reviewed in relation to the Environmental Destination set out within it, and whether that scenario is sufficient to meet legislative and policy requirements. In particular, where the Plan relies only upon the Environment Agency's minimum requirement of "Business as Usual plus" (BAU+), Water Companies must ensure that their WRMP includes a pathway to meet all their environmental assessment and nature recovery obligations in line with duties and timetables in Annex 2.	We have set out adaptive planning pathways describing the alternative approaches we would take in the event of the preferred option delivery and timings not being achieved as part of our Revised draft WRMP24 Decision Making technical supporting document. This includes a pathway showing how we would meet the Enhance Environmental Destination scenario following the outcome of AMP8 WINEP investigations.	Yes	Revised draft WRMP24 Decision Making technical supporting document, Section 10
34	Natural England	1. The Environmental Destination as defined in the Regional Plan modelling that has been relied upon by Anglian Water does not yet go far enough, fast enough nor it is yet prioritised in the correct locations to meet the nature recovery obligations set out in Annex 2. We recognise and support further work planned by WRE and AW to refine and prioritise the Environmental Destination to meet the nature recovery obligations set out in Annex 2.	We understand the concerns raised around the level of detail from the environmental destination scenarios. Our proposed WINEP environmental destination investigations will refine and prioritise future changes in abstraction, including locations.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
35	Natural England	2. We would like to remind AW that although Environmental Destination has a final delivery date of 2050 there are other obligations that must be met before then (see Annex 2 for more information). a. Environment Act targets halt species decline by 2030 and increase species by >10% by 2042) b. The “30 by 30” commitment c. 25 Year Environment Plan target for 75% of SSSI to be in Favourable Condition by 2042 with mechanisms in place to achieve favourable condition by 2028	The Environment Targets, "30 by 30" commitment and 25 Year Environment Plan have all been considered within WRMP24, and we have sought to deliver environmental destination as soon as sustainable new sources of water can be commissioned.	Yes	Revised draft WRMP24 Sustainable abstraction and environment technical supporting document, Section 3
36	Natural England	3. We welcome WINEP investigation and the clear intention to work with NE, regulators and stakeholders to better understand the impacts and hence deliver specific environmental needs within AW region. Inform actions necessary delivery of, Env Act indicators, especiallyB5 and B6, Protected Sites, Nature Recovery Network and Local Nature Recovery Strategies.	We are looking forward to starting the WINEP Environmental Destination Investigations later this year and working closely with stakeholders including Natural England.	No	N/A
37	Natural England	4. The WINEP investigations are very welcome step to achieving these and we would like to stress that they need to include achieving all statutory and policy drivers and objectives as above as well as the core Environmental Destination as described in Regional Water Resources Planning Guidance d. These timelines highlight the importance of the investigations and that action needs to follow at pace, particularly in light of the high proportion of water dependent habitats supporting priority species in the region (there are over 1000 priority species in the Broads for example (Broads Biodiversity Audit)	We understand the need for achieving all statutory and policy drivers and objectives in addition to the environmental destination. These will be considered in due course, particularly when developing the scope for the investigations.	No	N/A
38	Natural England	5. We note the AW/WRE intention is to meet the outcomes of the Enhanced scenario rather than the defined water returns in the scenario. e. This approach is a risk that must be carefully managed to ensure all statutory and policy outcomes are met within their respective timelines in the right place and scales. f. Environmental Destination must deliver at appropriate ecological scales and catchments which may be different to WRZs g. The pace of this investigation and delivery on its outcomes is important to achieve the requirements above so we’d encourage action within AMP period and not delay delivery until subsequent AMP	We welcome the points raised by Natural England and we will be engaging further over the coming months in terms of developing the scope of the environmental destination investigations, especially in regard to understand the appropriate ecological scales. In addition, we are early funding these investigations, providing action within this AMP period and to ensure timely conclusion ahead of WRMP29.	No	N/A
39	Natural England	6. In light of the most likely future climate change supply patterns, ie high volume infrequent rainfall events rather than continual availability we would encourage a greater consideration of non-traditional supply options such as flood storage and treatment and Nature Based Solutions.	We continue to seek opportunities to adapt to climate change, such as flood storage and nature based solutions, as well as to protect our customers and their property from its impacts. Our revised draft WRMP24 sets out a credible option set, that meet the criteria set out in the WRPG, in which we have confidence in our cost estimates for price review purposes	Yes	Revised draft WRMP24 Supply side options technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		h. These types of solution provide good opportunities for integrated delivery of environmental policy and targets and wider objectives for communities and growth.	as well as a high degree of certainty in resource availability and resilience to drought. However, we are committed to exploring complementary solutions in order to achieve better environmental outcomes and better value for our customers.		
40	Natural England	**6.0 Demand management** 1. The plan relies on demand management to meet growth in the short and medium term until new options and transfers are in place	We have shown how our demand management strategy will enable us to avoid the risk of over abstraction in our revised draft WRMP24 Decision making technical supporting document. This includes how the licence capping scenario 4 aligns with Figure 1 of the Water Resources Planning Guideline Supplementary Guidance, and reduces the risk of deterioration over time through demand management and licence caps that trigger alternative sustainable supply side options. Further detail of how demand will reduce at the more detailed planning zone scale is provided in the Annex. We will monitor the effectiveness of our demand management strategy as part of adaptive planning and the WRMP annual review process.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5 and Annex
41	Natural England	a. AW should be seeking significant demand management measures if possible, to remove impacts and allow nature to recover as soon as possible and not waiting until new supplies come on-line. The demand management interventions should be timetabled from as early as possible in the plan to meet the objectives, policies and timetables for nature recovery set out in Annex 2.	We plan to build upon our proven track record of delivering demand management savings, through our leakage reduction strategy, ambitious smart metering programme and innovative water efficiency initiatives. We will extend our ambitious programme of demand management options, in order to support our new revised draft WRMP24 plan; one that provides economic benefits, delivers substantial water savings, but is also achievable. Our ambition is to drive the next 'step-change' in demand management through: technological innovation, enhanced communication strategies, improved understanding of our customers behaviour, and the implementation of 'industry leading' water efficiency initiatives. Savings from our smart meter programme, leakage reduction and water efficiency options, in combination with government led interventions are expected to more than compensate for regional increases in demand due to population growth during the WRMP24 planning period. With our ambitious programme for full smart meter installation and associated water efficiency measures, our customers should achieve a per capita consumption of less than 110 l/h/d, in line with the 2050 National Framework Target. Note that this includes a significant impact from government led interventions ('white good' and water utility labelling and mandatory design standards). Additionally, we expect to achieve record low levels of leakage.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 5

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
42	Natural England	b. Whilst recognising AW's demand management to date ultimately significant aspects of this are out of AW's control; Government led interventions and consumer behaviour including "decay rates" and so reliance on them adds uncertainty and risk to the environment.	We have included an assessment of government led interventions in our preferred plan forecast. This assessment has been based upon the WUK/Artesia Water UK 'Pathways to long-term PCC reduction' reported out-comes. Although there is some uncertainty regarding the implementation of this strategy, we have ensured that the impacts are weighted to the later stages of the forecast and we will monitor benefits as they arise. We, however, consider that the inclusion of this policy is pragmatic, in that it acknowledges the necessity for all stakeholders, including the government, to play their part in reducing household consumption and PCC. We also recognise that developing our understanding of future demand, human behaviour and the potential for water efficiency, is a continual process. As our smart metering programme is being implemented, it is giving us unprecedented insight into water consumption and is opening up new avenues for interacting with and understanding our customers. Additionally, the data that smart metering is providing is key to monitoring our demand management interventions, in addition to demographic changes that will occur in the future. This will allow us to forecast future demand with greater accuracy for future WRMP plans. Understanding customer attitudes, behaviours and societal influences with regard to their water usage, will be critical to the success of any future water efficiency objectives. We intend to build upon our current understanding by: - conducting longitudinal studies into our customer base, to understand long term changes in behaviour. - developing innovative concepts of 'water neutrality' and 'smart communities' into strategic actions for implementation in future WRMPs. - researching new ways of understanding customer demographics and segmentation (cluster analysis and machine learning). - trialling water efficiency initiatives with key stakeholders (including non-household options with retailers, water re-use options with developers and innovative irrigation systems) - development of our monitoring framework, in order to determine the long term benefits from our planned portfolio of water efficiency measures. - Researching methods of achieving ever lower levels of leakage and per capita consumption. Enhancing our understanding of human behaviour, with regard to water usage and the impact of our water efficiency strategies, will be key to improving our WRMP demand forecasting in future. We are, consequently,	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 13

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			implementing our 'Demand management monitoring framework' in order to assess behavioural change and the impacts of demand management options.		
43	Natural England	c. A clearer “plan B” that can be implemented is needed should demand management fail to deliver as expected.	We have set out adaptive planning pathways describing the alternative approaches we would take in the event of the preferred option delivery and timings not being achieved as part of our revised draft WRMP24 Decision making technical supporting document. This includes a pathway showing how we would adapt if demand management was less effective than expected.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10
44	Natural England	d. We do note however that short term measures must not compromise the delivery of strategic requirements for the long term.	Demand management only provides part of the solution and is not adequate without larger options. This is shown in the infographic we have produced which sequentially layers the baseline supply demand balance, the effect of the demand management strategy and any residual deficits, and finally the effect of the supply options.	Yes	Revised draft WRMP24 Main report, Executive Summary

2.37 NFU

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	NFU	**Response to consultation question one** The NFU responded to the non-statutory Anglian Water consultations for the Fens and South Lincolnshire reservoirs, further comments are provided below: Collaboration for long term water resources resilience is consistent with principles embedded in the NFU Integrated Water Management Strategy (IWMS). Water and agriculture share common challenges. Both need to deal with the impacts of climate change, be that drought, flood or extreme heat. Both face challenges through population growth, which in turn drives water supply and food supply needs. Water, whether as public water supply or to grow the nation's food, is of paramount consideration. As such, while the NFU acknowledges that the expansion of strategic water supply infrastructure is a vital to improving long-term, multi-sector water management in response to these challenges, the NFU believes that all new public water supply infrastructure must be designed and built to deliver multisector benefits specifically including to the agriculture sector). As such, agriculture's water needs must be recognised as an explicit part of resource use plans to ensure access to water for food production, food security and elements associated with this, such as employment and economic value. In addition, the UK must acknowledge the global water scarcity challenge and the impacts of this on UK food security. When agricultural/food producing land is being lost, agriculture must benefit either directly or indirectly. For example, this could be through direct access to water from new reservoirs or access to water through open water transfers. Water companies should be explicit in how Strategic Reservoir Options (SROs) can benefit water availability and this should be agreed in advance of construction to provide credibility and justification for the siting of the SROs. The potential availability of water for irrigation (either potable mains water or raw water) will help the agriculture sector where current abstraction licence constraints limit water availability, impacting on quality and yields of irrigated crops. Better consistency of supply and the future resilience of the agriculture sector are not only important factors in terms of future sector growth and sustainability, but also in achieving social and environmental outcomes.	We thank the NFU for its response. We will continue to work closely with the NFU and landowners on the design of the SROs and to ensure that agricultural needs are reflected in the system-wide realisation of benefits.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		Within the WRMP, Anglian Water states that the reservoirs will provide environmental benefits, and therefore the NFU asks for collaboration with the agriculture sector to ensure environmental opportunities are maximised. Further, the NFU believes that both the design and implementation during construction of any SRO must be carried out in a way that minimises impact on land ownership and agricultural operations. This will mean proper and open consultation with landowners and land managers during the development process of SROs. This protects the needs of landowners and land managers and ensures that they are actively involved in the decision-making process at all stages; and that decision making process is timely and transparent. To ensure the best outcome for everyone involved, the NFU asks that the following principles are applied to the design, development and construction of SROs. · Compulsory purchase powers to take land should be used as a last resort and voluntary agreements should be reached where possible · Developers should promptly pay enhanced compensation reflecting the dislocation, distress, income lost and loss of land as a result of a project · Habitat mitigation should be carried out to achieve 'no net loss' of biodiversity · Food production be mitigated to no net loss · Land take should be kept to a minimum and only the land needed for the scheme itself should be taken · Land should be taken on a temporary basis where possible and returned to agricultural use at the end of construction. · The developer should communicate and consult at an early stage with affected landowners and occupiers in regard to the proposed and final design of projects · Any necessary accommodation works should be incorporated within the design and implemented to minimise the impact on farm businesses ·An aftercare programme for soils and field drainage should be planned, funded and implemented · An 'Agricultural Liaison Officer' should be engaged at an early stage from pre-construction works · The developer/contractor should show a duty of care at all times to claimants.			

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
2	NFU	**Response to consultation question two** The NFU feels that a key element of the approach to the WRMP that is omitted is the multi-sector, collaborative work. If added, this would enhance the best value planning as options mentioned could involve the agriculture and horticulture sectors as landowners and land managers to realise and maximise potential opportunities. Food production could be included as a best value measure alongside the indicators already reviewed.	We have included an estimate for future demand for non-public water supply for hydrogen production and carbon capture on the South Humber Bank. Additional multi-sector needs, such as agriculture, form part of the development of the regional plan. Therefore, we have not included a food production metric within our assessment (other than for the potable agricultural demand that is included in our non-household forecast).	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Decision making technical supporting document, Section 8
3	NFU	The best value planning defines the key elements relating to demand management, supply management and states environmental management, within which the agriculture sector is a key stakeholder. For example, it is felt that water re-use, whilst mentioned with the WRMP, has not been explored fully from a multi-sector perspective and therefore the opportunities are not fully understood.	Through our Strategic Resource Option and Water Resources East partnerships we are exploring multi-sector opportunities. On top of this we have a number of initiatives to explore reuse on a localised level where we intend to engage with the agricultural sector. These options are not sufficiently developed to fully cost and model benefits, and as such it isn't appropriate to include them in our best value planning.	No	N/A
4	NFU	Agriculture's relationship with the water sector is critical to building the country's water resilience. There are significant opportunities to create multi-sector benefits by working collaboratively on projects, particularly in locations where summer supplies and availability may be an issue. We are always willing to work with Anglian Water to develop catchment approaches and support farmers in their efforts to improve the water environment. However, farmers run businesses and are under increasing pressures from a range of sources to deliver a variety of environmental objectives on the same parcel of land and this must be considered by Anglian Water when planning catchment activities. We must also work together and with other organisations engaged at the catchment scale to reduce duplication of effort and improve the delivery on the ground. This will result in benefits and cost savings for farm businesses and for Anglian Water.	We welcome NFUs support for catchment-based approaches and we understand the water pressures on the agricultural sector. Through the development of the environmental destination investigations through WRE, we aim that all abstractors will benefit from this work and a collaborative approach will be fundamental to the success of these investigations.	No	N/A
5	NFU	With regard to desalination, the WRMP states that time is required to gain further insight into the scale of need and to investigate the option further, in order to mitigate against potential negative impacts. We agree that this level of detail is required to enable an informed decision to be made on the suitability of desalination.	We thank the NFU for its response.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
6	NFU	**Response to consultation question three** The NFU is concerned that the proposal for a phased approach to reducing Anglian Water's abstraction may simply shift the burden and pressures of abstraction reduction onto agriculture and/or other sectors. Through the WRMP, it is quite clear that the length of time required to implement solutions in the water sector is not afforded to the agriculture sector when licence changes are notified. Instead, there must be a collaborative approach to supporting the environmental destination that builds resilience and sustainability in all industries/sectors.	We understand the concerns raised by the NFU regarding licence capping pressures. The environmental destination investigations will be taking a collaborative approach through engagement with WRE. We will be in contact with the NFU in the future when developing the scope for these investigations.	Yes	Revised draft WRMP24 Sustainable abstraction and environment technical supporting document, Section 7
7	NFU	We would like to see continued activity in protecting the water environment from water companies. Our members are very aware of the impacts of the activities of water companies as well as agriculture, on the water environment. Farmers are continually asked to improve and change practices in order to improve their environmental performance and to reduce impacts on water. We must all continue to work together at the catchment level to deliver continual improvements. It is also important that these joint improvements are communicated to local communities.	We agree with the NFU's emphasis on protecting the environment, which is why it is embedded within our best value planning approach. The environmental destination investigations will provide a great opportunity for collaborative working between sectors, as well as engaging with local communities.	No	N/A
8	NFU	There must be a co-ordinated and collaborative approach to protecting and enhancing the environment. Landowners and land managers can be key in providing catchment-based and nature-based solutions. Therefore, we urge Anglian Water to engage the agriculture sector in discussions about future work to ensure all opportunities are explored at a multi-sector level. This will enable an integrated approach to both land and water management. A further question to address is, how can this be achieved through programmes such as WINEP? The WINEP programme looks to deliver an integrated approach to water management as well as environmental protection and benefits and, the NFU feels this programme must involve the agriculture and horticulture sector as landowners and land managers. When reviewing the impact of land use and delivering environmental gains, a food impact/risk assessment should be undertaken, and supportive mitigation measures considered.	We will continue to engage with the NFU and agricultural sector in the development of the scope for the environmental destination investigations.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
9	NFU	**Response to consultation question four** The NFU is not in a position to agree or disagree but welcomes further conversations. It is important that the messaging around compulsory metering is clear and concise and outlines the remit for the metering and the benefits to the customer. It is essential that there are robust data security and data governance mechanisms to ensure that data are used only with the consent of those who supply it. Any large-scale data should be aggregated and anonymised to protect customers. The NFU asks that the messaging encompasses best practice use of water and particularly looks at an integrated approach that supports the multi-sector approach which can be used in times of stressed/limited water availability e.g. droughts.	As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. This is detail in our 'Demand management preferred plan technical supporting document'. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We currently already have a number of tariff options to assist these customers and would be keen to ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups and we will ensure that our compulsory metering programme will be introduced with sensitivity for all our customers. Whilst developing our smart meter strategy, we have embedded data security into our systems and understand our obligations under the GDPR regulations. We appreciate the sensitivity of this data and adhere to internal protocols which govern exactly who is able to access the data and for what purpose.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 4, 7, 8 and 10. Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 7

2.38 Norfolk County Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Norfolk County Council	**General comments** The County Council welcomes Anglian Water's (AW) aim to invest in their supply system to make it less vulnerable to climate change & drought, and more sustainable. However, the proposed cost is significant and will result in a sharp increase in customer bills, which will come on top of bill increases to manage issues with AWs sewerage and sewage treatment systems. At this stage, it is not clear if enough work has been done to ensure that the proposed plan contains the best options or is best value for customers.	We have created a best value planning framework, which identifies outcomes and objectives for our plan. This framework has been used to assess and compare plans and options. It is not possible to maximise everything, there will be trade-offs between objectives. Maximising one objective can affect the others in a negative way A best value plan recognising and balances the trade-offs between objectives to deliver the best outcome to customers, stakeholders and the environment. To get this balance right we have engaged throughout the process of developing our best value objectives and assessing alternative plans with both household and non-household customers as well as our stakeholders, see Customers and stakeholders engagement report.	Yes	Revised draft WRMP24 Decision making technical supporting document, Sections 3, 6 and 8
2	Norfolk County Council	As well as this, the plan is based on new reservoirs that will only deliver benefits in the medium to long-term. In the short to medium term, it relies on deferring measures to prevent deterioration in water body status. These are: · Bad for the environment, and for other abstractors in the affected catchments, and · Pose an unacceptable risk to plans for employment growth, including from initiatives such as the County Deal. Arising from the above, the draft plan should be re-examined to determine if it is as affordable and sustainable as it could be, with minimum risk of unintended consequences. Where this cannot be clearly demonstrated, the plan should be changed.	Our revised draft WRMP24 Decision making technical supporting document describes how we have developed our licence capping strategy, working closely with our regulators. It describes how our demand management strategy will enable us to avoid deterioration in the period before supply options are available due to the longer lead times involved. The report also describes the additional process step taken to develop our preferred most likely scenario, which delivers licence caps to recent actual average as early as possible in priority WRZs. Within the revised draft Environmental Report, the strategic environmental assessment of the timing of licence capping is presented and the licence capping scenarios have been included within the assessment of the four alternative plans. In addition, the WFD Sub-report has highlighted the potential risks related to the deferral of licence capping.	Yes	Revised draft WRMP24 Decision making technical supporting document, Sections 4 and 6 Revised draft Environmental Report, Sections 5, 6 and 7
3	Norfolk County Council	**Response to consultation question one** The water-supply priorities for Norfolk County Council (NCC) are resilience and sufficient capacity to meet demand from planned levels of housing and employment growth. Any strategy or scheme developed for this purpose also needs to safeguard environmental assets in the County and have regard to relevant planning policies. NCC has worked closely with Water Resources East on a range of water resource matters and with Anglian Water on the Fens Water Partnership. In principle, NCC recognise and support the need for new reservoir storage in the region but the following issues are noted.	We thank the Council for its support.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
4	Norfolk County Council	There is a reliance of the AW decision-making process on the WRE regional plan and the adverse response of the Environment Agency to consultation on this, including identifying a failure to publish the data, reports and other information needed to rigorously assess (a) selection of the new reservoirs, and (b) the timing of their delivery.	For the revised draft WRMP24, the SROs and other options have been unconstrained within our modelling. Through our ongoing liaison with the Environment Agency in the draft WRMP24 document we originally agreed to use the 'Regional plan low regret options plan' as our benchmark. However we have found through the least cost modelling that strategic no and low-regret options were selected in the same years for all least cost plans. Therefore we have used the Supply options least cost plan as our benchmark as this reflects the regional plan but does not constrain the scale or timing of the strategic options. This confirms that the least cost plan with the regional plan options unconstrained is suitable as the initial least cost plan.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6
5	Norfolk County Council	There is no detailed reporting on the work of the Regional Reconciliation Group (RCG), or any national scale supply-demand modelling by Ofwat or the Environment Agency. This means that it is not possible to determine how AWs reservoir selection and delivery works in conjunction with developments in adjacent supply systems	For the revised draft WRMP we have modelled a series of potential transfers from the other regional groups. At present these transfers are theoretical, as there are no immediate opportunities for importing water from other companies. This work is a repeat of the Regional Reconciliation 3 process, which seeks to ensure alignment between the five regional planning groups, in particular around the timing and selection of transfer options. This modelling provides a understanding at water company level and shows how our plan could adapt if one of the regional groups, in subsequent planning rounds, developed an option which could be shared between regions. The modelling shows that our plan could adapt if imports from other regions where available in the future. The imports would have the effect of offsetting the capacity of desalination needed if these transfers were deemed better value to developing the desalination. They would not impact the capacity of the reservoirs.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
6	Norfolk County Council	The new reservoirs appear to be at the expense of the supply-side schemes needed in the short to medium term to avoid deterioration in water body status. The volumes involved are significant, and the effect of delivering this additional capacity on the size & timing of the need for the new reservoirs is unclear. Alternative options that are potentially available include: a. Accelerating delivery of the water reuse and desalination schemes that are selected post-2040 b. Imports from Severn Trent Water and Yorkshire Water. In both systems, large surpluses are forecast from 2025 onwards and AW could use their new strategic grid to make these available in resource zones with no-deterioration requirements, and c. A temporary reduction in levels of service in parts of the Ruthamford reservoir system, and distribution of the water which is released via the new strategic grid Use of these alternative options may also have the benefit of delivering drought resilience ahead of the 2040 date proposed by AW. In the case of a strategic connection between the Anglian Water, Severn Trent Water and/or Yorkshire Water grids, this could provide relatively low-cost protection against localised incidences of drought in each system and so be of national significance.	a. Due to the complexity involved in delivering reuse and desalination schemes, these are only available from 2032 onwards. The revised draft WRMP24 Decision making technical supporting document describes the testing of Scenario 7 licence caps, which are scheduled from 2032. Scenario 7 modelling selected desalination and reuse options earlier, but this has the downsides of increased operational costs, delaying the timing of the SRO reservoirs (which could make the plan less adaptable to future scenarios where they are required earlier), and generating surplus resource. To use the surplus resource would require earlier commitment to the Environmental Destination abstraction reductions (before the outcome of the WINEP studies in AMP8), which again would make this scenario less adaptable. On this basis, Scenario 4 was selected for the initial most likely planning scenario. b. During option appraisal we didn't identify any options to import water from Severn Trent Water or Yorkshire Water. There are a number of constraining factors that mean that such transfers did not pass initial screening, however, one of the main factor is that we have options in Lincolnshire that we can develop early in our plan. These are options that maximise use of resource already available to us. LNE11, LNE12, LNC30 are all options which can be delivered by 2030 and make use of the capacity in our strategic pipeline to distribute the resource. Transfers that could bring water from Severn Trent or Yorkshire's regions would be long and complex to plan and deliver (major motorway, rail and river crossings) and so would not be delivered any sooner than the options in our Best Value Plan. Not only that but delivering such options for short term needs will result in them becoming stranded assets in future when our other strategic resource options are delivered. c. As part of our drought resilience policy decision making analysis for our revised draft WRMP24 we have modelled the possibility of amending our levels of service (i.e. allowing demand side measures to occur more frequently) to understand if this could enable a greater deployable output in our drought-impacted Water Resource Zones. However, the modelling has shown that without breaching the Emergency Storage levels, there is no increase in deployable output by increasing the frequency of demand restrictions. This is because deployable output is based on a reference drought event, which already has the benefit of demand saving measures included. Any additional benefit from changing levels of service would require a cumulative effect in the years preceding the reference drought, which could theoretically enable an improved starting position. Our analysis	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			has shown no such cumulative effect is present. The reservoirs were able to refill sufficiently in the intervening years between drought events at the current levels of service.		
7	Norfolk County Council	The requirement for the new reservoirs is largely driven by current estimates of future environmental need. Reference to use of the AMP8 WINEP investigations to "determine future environmental strategy" suggests that these may not be as reliable as they need to be to justify delivering two large new reservoirs in the mid to late 2030s. Previous WINEP experience shows that early estimates of the reductions needed to restore abstraction to sustainable levels are often conservative, and that there may be large differences between these and the changes that are ultimately made.	The main driver for the Lincolnshire Reservoir is drought resilience to a 1 in 500 year drought, Fens Reservoir is driven by sustainability reductions. It should be noted that sustainability reductions are the statutory capping of licences driven by WFD, whereas, the AMP8 WINEP investigations will be exploring the environmental destination scenarios in further detail which has the potential to conclude licence reductions in addition to the sustainability reductions.	No	N/A
8	Norfolk County Council	Arising from the above, it is unclear if a strategy based on new reservoirs in the 2030s is best for the AW supply-system or more broadly, for the AW and adjacent supply-systems. The results of the "supply options least cost plan" analysis suggest that where alternative options are available, the proposed new reservoirs may not be needed, or the timing of their need may be significantly altered. Given the large, irreversible capital, operating and carbon costs involved, the case for "putting reservoirs at the heart of the strategy" needs to be re-examined and either strengthened or changed.	For the revised draft WRMP24, the SRO options have been unconstrained within our modelling, but have still been selected in our least cost plans. Through our ongoing liaison with the Environment Agency in the draft WRMP24 document we originally agreed to use the 'Regional plan low regret options plan' as our benchmark. However we have found through the least cost modelling that strategic no and low-regret options were selected in the same years for all least cost plans. Therefore we have used the Supply options least cost plan as our benchmark as this reflects the regional plan but does not constrain the scale or timing of the strategic options. This confirms that the least cost plan with the regional plan options unconstrained is suitable as the initial least cost plan.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6
9	Norfolk County Council	**Response to consultation question two** NCC welcome the twin-track approach proposed by AW, including its emphasis on reducing: · Water wastage through demand management, and · Leakage from current/existing infrastructure	We thank the Council for its support, and highlight the third tier is on our approach is adaptive resources.	No	N/A
10	Norfolk County Council	However, the lack of new supply-side options in the short to medium term could threaten NCC plans for employment growth. The principal risk is that there is insufficient capacity in the AW system to meet demand from new non-household customers, including: a. New businesses which may be looking to locate in Norfolk as part of the proposed £600m "County Deal", or b. Existing businesses in Norfolk with private water supplies, who may be looking to migrate to the public water supply system in response to Environment Agency work on restoring sustainable abstraction	Our company Purpose 'is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop'; this is enshrined in our Articles of Association. In support of our Purpose we have an important role to play in facilitating economic development; this includes providing a sustainable supply of water to efficiently meet new or additional non-domestic demands. However, providing this water is becoming increasingly difficult due to a combination of abstraction licence caps (both for us and other abstractors) and higher levels of non-household demand, meaning we have limited headroom available to us. In response,	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			we have had to develop a new non-domestic policy position that may lead to us declining to supply new non-domestic demand. We are acutely aware of the implications that this may have. Our new non-domestic policy position has been developed from our legal obligation; as a water undertaker we must provide water for domestic purposes, such as drinking, cooking and sanitation. As this legal obligation does not extend to the provision of water for non-domestic purposes, such as agri-food processing, we must prioritise the water we have available for domestic users , now and in the future. We are highlighting this, and our concern about supplying non-household demand, to our regulators and Government, asking them to consider funding mechanisms for the provision of water for new non-domestic properties, so we can develop supply-side solutions that can provide headroom in our network. We would like to reiterate that we do not want to restrict economic growth and social prosperity but acknowledge, if we do not act quickly, the lack of water resources will be a severe constraint to non-household growth.		
11	Norfolk County Council	By concentrating on new supply-side options for future environmental needs, AW appears to have over-looked the benefits of a more integrated approach to land and water management. Instead of relying exclusively on carbon intensive storage, treatment and transfer options, more effort should have been made to incorporate nature-based solutions, including river & wetland restoration and management. Using experience from previous WINEP projects and working in partnership with farmers, landowners and others, such schemes could be delivered through initiatives including: a. Broadland Catchment Partnership b. Norfolk Water Strategy Programme (NWSP), and c. The Broadland abstractors (BAWAG) Masterplan for the lower Ant Valley	Our WRMP24 documents should be considered in conjunction with our DWMP, WINEP and LTDS. The revised draft supply side options report does provide more information about options, areas of innovation and adaptive planning approaches. We are an active water company member of WRE and will be working closely with the partnership organisations mentioned to explore opportunities as and when they arise. However, we must consider that our WRMP options must meet the WRPG criteria for definable benefit and cost.	No	Revised draft WRMP24 Supply-side options development technical supporting document
12	Norfolk County Council	**Response to consultation question three** In the short to medium term, the plan relies on the deferral of measures to prevent deterioration in water body status. These measures are based on a reduction in licensed volumes of abstraction. To avoid this, AW propose use of Regulation 19 of the Water Environment Regulations (2017) or some other similar arrangement. This would allow continued abstraction for reasons of overriding public interest and the justification is that AW has no technically feasible alternative, or no alternative which is not disproportionately costly. These points are noted by the Environment	Licence caps in WRMP24 will impact both our time-limited and permanent licences. We have a high proportion of time-limited licences compared to other companies; out of our 202 abstraction licences, 124 are time-limited. Of these 124, 76 will expire before WRMP24 is implemented, leaving us no time to develop, design and construct new supply-side options that will offset the impacts of moving to recent actual average volumes. We are working with the Environment Agency to mitigate the impact of moving our time-limited licences to recent actual average. Where we can't implement them without an interruption to our customers' water supply,	No	Revised draft WRMP24 Main report, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		Agency in their response to the WRE regional plan; there appears to be no equivalent detail in the draft AW plan. In terms of "doing the right thing for the environment" this approach is problematic. As well as leading to an unacceptable level of residual deterioration risk: · There are supply-side options available which would enable the use of Regulation 19 to be avoided. These are described above · There may be other, local options for making the necessary changes such as temporary or permanent cross-sector licence trading. There is no evidence that these types of option have been investigated, and · It appears that the Regulation 19 approach & related options have not been included in the Strategic Environmental Assessment (SEA) on the draft plan or any Habitats Regulation Assessments (HRAs). It is noted that the Regulation 19 approach is not only an issue for the environment, but also one for other abstractors. These are subject to the same regulatory processes as AW, and where water body status is at risk they will be expected to make equivalent licence reductions. The level of disruption & any cost that results will likely be exacerbated where AW are permitted to continue to abstract.	we submit cases of Overriding Public Interest (OPI) which will demonstrate that the licence caps need to be delayed until we have additional sustainable sources of water to replace our DO losses. For the cases of OPI that are currently being considered, we have adopted an interim annual licence volume for the period from April 2025 to March 2030 within WRMP24. This interim volume reflects the latest OPI discussions that have occurred for abstraction licences with an expiry date in 2022/23. This licence capping approach has been considered in our SEA. To mitigate the risk of deterioration, we are developing all the supply-side options available to us, that provide a DO benefit, before 2032. Our demand management strategy will also offset the impacts of growth. We have considered temporary and permanent cross-sector licence trading and have found no viable, resilient options available to us. We continue to work with other abstractors and WRE to determine the appropriate scientific investigations for our AMP8 WINEP.		
13	Norfolk County Council	**Response to consultation question four** Subject to suitable arrangements for protecting vulnerable customers, NCC support measures to ensure that all water supplies are metered. This applies to both household and non-household customers	As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. This is detail in our 'Demand management preferred plan technical supporting document'. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options to assist these customers and will ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 4, 7, 8 and 10 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 7

2.39 North Hertfordshire District Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	North Hertfordshire District Council	We are pleased to see a focus on demand management, reservoirs, and water reuse in the Anglian Water Resources Management Plan.	We thank the Council for its support.	No	N/A
2	North Hertfordshire District Council	It was however somewhat disappointing to understand that work to select an initial environmental destination has not been completed and we have concerns that an investigation to inform the environmental destination will not begin until 2025 or reach completion before 2030. This timeframe does not reflect the urgent need to reduce abstractions to achieve ecological improvement and reduce uncertainties around future water supply. Without selection of an environment destination and a clearer sense of what 'sustainable abstraction' means in practical terms, it is difficult to understand the extent to which your proposals around supply-side options are sufficient.	Since the publication of the draft WRMP24, we received confirmation of early start funding for the environmental destination investigations. Therefore, we will be beginning to scope this work towards the end of the year with the aim of the outputs to feed into the next round of plan-making.	Yes	Revised draft WRMP24 Sustainable abstraction and environment technical supporting document, Section 7
3	North Hertfordshire District Council	More information is also needed around your approach of being adaptable and the decision points. There is a gap of ten years between your two decision points and it may be sensible for the second decision point to happen sooner than currently planned. Likewise it might be prudent for the trigger point to also occur prior to 2040.	Our revised draft WRMP24 Decision making technical supporting document sets out a series of adaptive pathways which describe our actions in the event of changes to our preferred programme due to delays in options, options becoming infeasible and demand management not providing expected benefits. This includes a summary of risk mitigation actions, monitoring points, decision points and trigger points.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10
4	North Hertfordshire District Council	**Response to consultation question one** We acknowledge the centrality of reservoirs to reducing uncertainties around supply and the need for abstractions which will impact on the environment, however we urge that local impacts are taken into account through stakeholder consultation. Feedback from consultation should be fed into the decision-making in a transparent manner and there should be strong regulatory oversight. Key to ensuring public buy-in will be reducing the impact of the reservoirs on the environment, seizing the opportunity to improve biodiversity, and enhancing the green infrastructure and leisure facilities that local communities can benefit from via the reservoir creation.	The SRO projects are reviewing consultation feedback and incorporating it into their decision making processes for the reservoirs. We recognise that the reservoirs have an opportunity to make a significant positive impact to local communities and the environment around it.	No	N/A
5	North Hertfordshire District Council	You should continue to explore water reuse and desalination options and incorporate this where necessary into your plans for adaptability and dependent on your environmental destination.	Water reuse and desalination are key elements of our adaptive pathways. To enable the plan to adapt to changes earlier in the planning period we shall be commencing the design of the Bacton desalination option within AMP8 so we are able to respond if an adaptive pathway is triggered.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
6	North Hertfordshire District Council	**Response to consultation question two** Demand management is clearly key to achieving the necessary water security and should be prioritised. More detail is needed around how you plan to work with households; business, industry, and agriculture; and other sectors such as health and education, in order to reduce demand. Efforts here must be underpinned by evidence-based behaviour change campaigns.	Key to our water efficiency strategy is the introduction of the smart metering programme. This is instrumental in enhancing our ability to communicate more effectively the reasons why demand and water efficiency are so important in achieving our goals for the environment and for the provision of sustainable clean water supplies. We are keen to build on our current momentum and the rapid deployment of smart meters across our region, while expanding our digital offerings to take full advantage of our smart future. Our proposed portfolio represents our most extensive programme of water efficiency and behaviour change activity to date. Our ability to change customer behaviour and drive efficiency will be noticeably enhanced, as it is supported by our smart meter 10 year installation programme. Smart meters are now facilitating innovative water efficiency interventions and allowing us to provide a platform for tailored customer engagement. Some of the options that are enabled by smart metering include customer campaigns and reward schemes through the smart meter usage portal (MyApp Account) and smart home device retro-fitting. These options will be included in our preferred portfolio. The success of smart metering will also be directly related to our water efficiency activities. We understand that smart metering is a technological revolution and it needs to be accompanied by a behavioural revolution to unlock its full potential to help manage demand. We are excited by the opportunities that the provision of timely consumption data from smart metering is having on our ability to change consumer behaviour and to promote the conservation of water. As part of our demand management strategy we are currently developing communications strategies that can be directly tied to consumption data, giving both household and non-household customers insight into their water usage. These communications will focus on consumption, but will also be key to providing context for all consumers, as to why water efficiency is so important for both themselves and the wider environment. As we develop these strategies, we will be keen to consult and collaborate on how co-ordinated messages might be deliver further benefits over time.	Yes	Revised draft Demand management preferred plan technical supporting document, Sections 4, 6, 7, 9 and 10 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6
7	North Hertfordshire District Council	More evidence is needed around how likely it is that the required amount of water will be saved by demand reduction at various milestones. As above, the decision points may need to be reconsidered and if the demand reduction is not as successful as you had planned for at these decision points, then the strategies for this management will need to be re-thought or the reservoirs, water reuse and desalination given higher priority.	We have set out adaptive planning pathways describing the alternative approaches we would take in the event of the preferred option delivery and timings not being achieved as part of our revised draft WRMP24 Decision making technical supporting document. This includes the actions we would take if demand management is less effective. In this pathway we would bring forward desalination options, and adjust licence capping timings to manage any residual deficits earlier on in our forecast.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
8	North Hertfordshire District Council	With regards to leakage, the plan states that you have already achieved large reductions in leakage compared to other water companies and that your value assessment indicates that the resource required to reduce leakage by 50% would not make a focus on leakage reduction best value. The plan states: '...we feel that more benefit would be achieved by other companies achieving the leakage levels we have achieved already'. Whilst we appreciate that leakage reduction may not be the best value option we would also urge against complacency and any implication that your current levels of leakage reduction need not be improved upon, even if not by 50%.	As part of our revised draft WRMP24, and in the light of our consultation, have reviewed our leakage reduction programme. We have, consequently, included our maximum feasible leakage reduction programme, achieving a reduction of 38% (from the 2017/18 base-line) by 2050. This reduction is now more in alignment with the anticipated reductions from other water companies. Additionally it should be noted that if the 50% reduction for leakage is applied as a set of national attainment curves, Anglian Water will be below these targets by 2030 and very significantly below, by 2050. We are currently a frontier company for leakage, recording our lowest level of leakage in 2021/22. This means that more cost effective leakage reduction strategies have already been exhausted. We will, therefore, need to engage in significant mains replacement over the WRMP24 planning period (at a significant cost). This additional cost has been profiled to occur at later stages in the WRMP24 planning period, giving ample time to investigate technologies to mitigate and reduce the cost (due to mains replacement). We however, consider that this increased ambition indicates our commitment to meeting the overall national target and intend to investigate technological advancements that should mitigate this cost as we prepare future plans.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 4
9	North Hertfordshire District Council	**Response to consultation question four** There remains uncertainty around the long-term impacts of smart-metering on customer behaviour and so this should be monitored, and any future evidence taken in account. Metering must also be combined with behavioural change campaigns to ensure that behaviour change is embedded and permanent. Opportunities must also be taken to consider how you can support your lower income customers and those with higher water usage needs (e.g health and medical reasons) as you rollout smart metering.	Whilst considering the importance and critical role that demand management will play in achieving our preferred revised draft WRMP24 out-comes, we will carefully monitor the effectiveness of these measures, as the revised draft WRMP24 plan unfolds. This will be needed to ensure the effectiveness of our water efficiency measures and allow the timely implementation of adaptive plans, in the case that demand management options are less successful than initially expected. We are consequently instituting our 'Demand Management Monitoring Framework'. This will allow us to fully leverage the consumption data that smart meters are facilitating. Analysis of the detailed daily smart meter data will allow us to look into underlying consumption patterns: -understand current customer behaviours (through cohort analysis and usage patterns). -investigate the effects of different demographic groups (age, occupancy, house type) on demand and how changes in these will impact consumption over time. -analyse the impacts of weather, climate and drought on demand.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 6 and 13

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			-understand the long term impacts of the Covid19 pandemic and resulting societal changes (working from home). -determine the effectiveness of government led interventions including 'white good' labelling and mandatory standards. As we implement water efficiency and demand management options we will need to determine how effective they are and how we might improve their efficiency. The 'Demand management monitoring framework' will, therefore, be designed to allow us to: -Investigate and understand our customers consumption patterns and attitudes to water consumption; this will allow us to model our base-line population and also understand how demographic change will modify our forecasts over time (aging). -Scientifically analyse our current demand management portfolio and ensure that our water efficiency teams are concentrating on the most effective options and targeting them at customers who will benefit the most. -Model and test demand management options, so that they can be realistically included in our future forecasts for WRMP29 and beyond. We are also planning to actively monitor leakage reduction and non-household demand reductions as part of the Monitoring Framework. As part of our plan we intend to include options to assist and incentivise vulnerable customers with internal/cspl leaks. We currently have a number of tariff options to assist vulnerable customers and as we move to a compulsory measured position we will be very mindful and sensitive as to how we will need to assist vulnerable customers with the transition.		

2.40 North Kesteven District Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	North Kesteven District Council	**Response to consultation question one** Yes. The Council accepts that a mixed portfolio of supply side options needs to be developed to meet the growth in demand anticipated by 2050. It is acknowledged that the supply side options have been subject to detailed modelling and whilst there remains the opportunity to conject about the balances between reservoirs, reuse and desalination as the main alternatives, it is accepted that reservoirs are needed at scale to meet demand.	We thank the Council for its support.	No	N/A
2	North Kesteven District Council	The key assurance needed relates to the fact that the development of the reservoirs will take some time to bring forward in to supply (the Lincolnshire Reservoir being anticipated as contributing to supply by 2041) and as such is the draft WRMP24 sufficiently flexible to make good any delay in the provision of the reservoirs. In other words, is there a Plan B that could make good any shortfall, any delay or any unexpected issue? To this end, the Council would strongly suggest that there is a need to ensure the programme for bringing forward desalination schemes runs alongside and not after the provision of the reservoirs. This would ensure that any delay in the reservoirs does not impact adversely on delivering the increases need in respect of supply and would thereby mean the strategy of the WRMP24 is more robust and resilient.	We have set out a series of adaptive planning pathways describing the alternative approaches we would take in the event of the preferred option delivery and timings not being achieved as part of our revised draft WRMP24 Decision making technical supporting document. This includes the actions we would take if the reservoir options took longer to deliver than planned: - Fens reservoir later than planned. We would bring forward our Bacton Desalination option which will be designed in AMP8. This ensures we can still deliver permanent licence caps to recent actual annual average as planned in 2036. - Lincolnshire reservoirs delivered later than planned. We would need to adjust our timing to deliver Environmental Destination and explore enhanced demand management options.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10
3	North Kesteven District Council	**Response to consultation question two** Yes, the approach is supported. However, for the development of the reservoirs specifically, and given their impact upon a host locality and its communities, there is a need to ensure that the best value approach is delivered in full. In this respect, the reservoirs cannot be brought forward on the basis of the 'cheapest option', this would conflict with the terms in the draft WRMP24 and also fail to reflect the WRE Regional Plan that extolls the need for 'best value' and not 'least cost'. As much as the reservoirs are needed for water supply reasons, they offer a wide range of significant benefits but whilst also giving rise to lasting and irreversible change to the host locality. In undertaking a draft benefits stacking exercise, the Council are mindful of the imposition upon the local community and the consequent loss of homes, businesses, farms but then it is also recognised that a range of positives accompany the prospective development. And this dichotomy underpins the following comments.	We thank the Council for its support. The reservoirs have been selected under our best value planning approach and continue to be developed to minimise impacts whilst maximising the opportunities.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
4	North Kesteven District Council	The first, is that a broad reading of the draft WRMP24 and launch event slides makes no concession about the dislocation to be suffered by residents and businesses that will be affected by the reservoir in either the loss of their home, a place of work or their business and/or by the significant degree of change they will experience from the construction and operation of a reservoir in how it may change the amenity and enjoyment of their home or in how the practicalities of carrying on a business might change and how farming practices may change as a result of landscape change. There is in terms of the host community for a reservoir a significant degree of change, and whilst some outcomes can be balanced as being positive (biodiversity, ecology, visitor economy, health etc) for those most directly affected the impacts could be long lasting. The draft WRMP24 ought to recognise the impacts and offer more in the way of how Anglian Water will proactively support the host community.	Thank you for your considered feedback. We do recognise the disruption to the host communities of the reservoirs. We are continuing our engagement with the communities, and progressing ways in which they can be supported. As this detail is very project specific, rather than plan based like the WRMP, we have chosen to communicate potential impacts and help on a community basis rather than through a statutory document, as we feel this is more appropriate. We would also like to highlight that we will continue to communicate with the local communities, with the Environmental Impact Assessment process facilitating such consultation and giving the opportunity for feedback to be built into the SRO design.	No	N/A
5	North Kesteven District Council	The second relates to socio-economic benefits and whilst these are highlighted, there is far more that needs to be examined under this heading and there then needs to be a much stronger commitment by Anglian Water to engaging in the delivery of positive outcomes in the local community and in connecting the opportunities of the reservoir with the wider local geography. And in this regard, and in pursuance of the Best Value Plan being advocated within the draft WRMP24 (and the WRE Regional Plan), there is the need for funding and investment as direct and attributable mitigations related to the reservoir. For example: · The prospect for local jobs and apprenticeships during the construction and operational phases of the project; · Community Benefits Package to help nearby communities adjust, adapt and invest in new infrastructure and to deal with changes attributable to the reservoir both during its construction and then in the future operation of the site; · Active transport - connectivity via safe recreational routes around the reservoir (walking and cycling) but also links to nearby villages and Sleaford as a fully funded investment in the locality by the promoter; · Delivery of sustainable transport such as funding for bus routes, re-opening Helpringham Station etc; · Health and wellbeing outcomes; · The opportunity for a visitor experience centre - a centre of excellence that explains the important role of the reservoir, how the site was selected, how the benefits (environmental, climate change, ecology, health and wellbeing etc) were secured, and serves as an education centre for universities, colleges and schools.	We believe that the Reservoir development offers an opportunity for socio-economic benefits to both the local community and the broader region. As part of the development of the SROs, we will be developing a socio-economic strategy that will set out the socio-economic benefits of the reservoir. Social value will also be part of the Environmental Impact Assessment for the reservoirs.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
6	North Kesteven District Council	The reference to “minimise unnecessary bill increases” within the slides for the launch event needs to be set in a better context of the best value ambitions on the WRE Regional Plan and an approach that is equally referenced in the draft WRMP24. The language around ‘unnecessary’ cannot be used as a means to curtail or reduce investment to the benefit of the host community and locality for the reservoir. Ultimately, there is a reasoned expectation that a developer should mitigate the impact of their development, and this can, and often does, mean that funding is sought to make unacceptable development acceptable. It is one of the principles that underpins the planning system. The Council will continue to make a case for funding to mitigate the development of the Lincolnshire Reservoir, to ensure investment is made during construction and in respect of the operation of the development.	The reference to 'minimise unnecessary bill increases' is in relation to the WINEP investigations to confirm the scale and location of environmental destination, so we can adapt our plan to meet the confirmed need. This ensures that we are not investing in new resources, such as desalination, until we are sure of the required capacity or location where they are needed.	No	N/A
7	North Kesteven District Council	**Response to consultation question three** Yes, but again host communities as well as the environment need to be supported on the basis of the best value plan. See the answer to the first question above. And equally, and again as set out above in the same answer, there is a need to programme the delivery of desalination alongside the provision of the reservoirs to ensure supply side solutions are progressed in a robust and resilient manner.	Water reuse and desalination are key elements of our adaptive pathways. To enable the plan to adapt to changes earlier in the planning period we shall be commencing the design of the Bacton desalination option within AMP8 so we are able to respond if an adaptive pathway is triggered.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10
8	North Kesteven District Council	**Response to consultation question four** Yes. As set out and explained in the draft WRMP24, the approach to securing universal use of smart meters offers the opportunity for the widest benefits for the region as a whole. However, the Council will expect the roll out of such an approach to be done in an equitable and fair manner where the needs of the most vulnerable in society are taken in to account.	As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. This is detailed in our revised draft WRMP24 Demand management preferred plan technical supporting document. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options to assist these customers and would be keen to ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 4, 7, 8 and 10 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
9	North Kesteven District Council	Further, whilst smart meters will assist in customers better understanding their individual water usage, Water Companies must continue to campaign for and make representations to Government to encourage reduced use and water conservation through Government legislative programmes. For example this could be through better standards in product design or through the Building Regulation water efficiency standards.	We fully support the concept of water efficiency labelling and consider it to be integral to our reaching the 110l/h/d target for 2050. We will investigate the potential for supporting the roll-out of 'white good labelling' as part of our 'Demand Reduction Discovery Fund'. As progress is made with regard to the implementation of this policy, we will be keen to collaboratively promote the roll-out. We are also keen to work with developers and now NAVs, who are now increasing their footprint in the Anglian Water region. it must be noted, however, that with NAV sites potentially become dominant with respect to 'new-build', they will have a leading role with respect to new development water efficiency and the relationship with their new customers. We fully support the idea that we must all work collaboratively and encourage the government to further drive water efficiency through legislative programmes.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 7 and 10

2.41 Ofwat

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Ofwat	**Demand management ambition and outcomes** The Government's strategic priorities for Ofwat states reducing demand for water can relieve pressures on water supply and increase our resilience to extreme drought. Water companies must act to reduce demand for water in a way that represents value for money in the long term. We expect all companies to use their WRMPs to show how they will meet long term water demand targets including: · halving leakage across the industry by 2050, in comparison to 2017-18 levels · reduce per capita consumption (PCC) to 110 litres per head per day (l/h/d) by 2050 A further target is now set in the Environmental Targets (Water) (England) Regulations 20234 for the reduction of potable water supplied by water undertakers in England to people in England. This is that the volume supplied per day per head of population is at least 20% lower than the 2019-20 baseline by 31 March 2038. We expect companies to demonstrate how they will deliver against this target in their final WRMP. Anglian Water is not proposing to meet the long-term leakage targets by proposing to reduce leakage by 24% by 2050 from 2017-18 levels. The leakage section below sets out our expectations to justify this level of ambition in the context of the leakage levels that Anglian Water already achieve.	Whilst developing our revised draft WRMP24, we have considered all relevant targets and commitments that have been included within the regulatory framework. These targets have informed the envelope within which future forecast demand should be viewed and the ambitions that should be embodied in our demand management strategy. However, whilst developing our preferred plan, it must be understood that forecast projections are based upon current experience and analytical outputs, such that planning outcomes are rigorously based upon and reflect real demand data. Forecasts and outcome metrics have, consequently, been grounded upon: - the current position of Anglian Water with regard to key metrics; demand, PCC and leakage. - known measurements and actual out-turns (i.e. base-line data and current demand management option saving assessments) - agreed assumptions regarding future demand management option delivery and customer behaviours, based upon internal expert assessment and external peer reviewed research. - regionally agreed views regarding future growth (and demographic change). Thus, whilst we have been mindful that our revised draft WRMP24 plan should aim to achieve (or closely match) governmental targets, our planned out-comes have been based upon our current position with respect to key metrics and complex modelling analysis of future demand management impacts. Our full assessment of our performance against each target is described in our 'Demand management preferred plan technical supporting document'. As described we into to: - achieve a PCC of <110 (DYAA) by 2050. - reduce non-HH demand by 8% by 2038 and by 15% by 2050 (noting this must be relative to growth and not an absolute decrease from the 2020 base-line) - reduce leakage by 38% (to our current lowest feasible level), noting that this incurs significant cost (and 50% leakage has impractical cost implications). - reduce DI/person by 18.6 % by 2038 (accounting for the high level of non-household demand and non-household demand growth in the region).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 13 Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
2	Ofwat	**Demand management ambition and outcomes** We welcome that the company states its intention to meet the per capita consumption (PCC) target of 110 l/h/d by 2050 in its draft WRMP narrative. We note that the company is expecting government-led interventions to help achieve this. .	As part of our demand management plan we forecast PCC at 109.74l/h/d for the DYAA average values (as described in the WRPG), in line with the EA/Defra target. This will be achieved through a combination of smart metering, water efficiency, behaviour change, plumbing loss reduction and government led interventions. The forecast reduction in PCC by 2050 is an 18.2% reduction from the 2019-20 baseline, with 5.6% being achieved in AMP7. As such a further 2-3% reduction would be required per AMP, making the suggested reduction of 3.3% proposed for AMP8 entirely reasonable. Accepting the recent volatility in PCC ranging from the very high level of 146.9l/h/d in 2020-21 to our lowest level of 131.3 l/h/d in 2022-23, and understanding that the main causes of these changes have been out of the control of water companies, we believe it would not be prudent to include lower assessment for PCC in the near term.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document
3	Ofwat	**Demand management ambition and outcomes** The company's final WRMP should also reference the target to reduce distribution input by 20% by 2037-38 and demonstrate how it plans to deliver this through a combination of reductions in the key demand components, leakage, household consumption and non-household consumption.	In designing our demand management strategy we have considered all the current target metrics, including DI per person. We have, consequently, included our most ambitious set of demand management options in our preferred plan. These options have been modelled from the bottom up for their impact on consumption, leakage and non-household demand, whilst accounting for regional growth. We have included the impacts of government led interventions on per capita consumption, based upon the WUK/Artesia report 'Pathways to long-term PCC reduction'. It must be noted that once all factors have been included we currently anticipate a reduction of 18.6% in DI/person by 2038. We will continue to work with all our partners and regional stakeholders to reduce demand over the WRMP24 planned period, but must stress that; - altering consumer behaviours and attitudes to water consumption will be a complex process - our area contains significant (27% and growing) non-household demand, which will need Anglian Water, retail, business and government participation in reducing demand - we are already a frontier company with regard to leakage and so further reductions will be challenging (notwithstanding that we have included our most ambitious leakage reduction programme).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 13 Revised draft WRMP24 Demand management option appraisal technical supporting document
4	Ofwat	**Demand reduction strategy** The company's draft WRMP appears to have looked at a wide range of options and narrowed these down to a smaller number of portfolios or scenarios. In its final plan the company should demonstrate that these demand management options are deliverable and that it has a sufficiently	Our revised draft WRMP24 Decision Making technical supporting document shows how our demand management strategy has been selected and how it contributes to best value decision making. We also show how we would adapt our plan if the benefits of demand management were not fully realised.	Yes	Revised draft WRMP24 Decision making technical supporting document, Sections 5 and 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		adaptive plan if it does not deliver the forecast demand reductions. It should set this out in the context of different timescales for the expected licence capping. The company's final plan should provide a clear explanation of its decision making and justification for the selected demand reductions in its final WRMP.			
5	Ofwat	**Delivery of PR19 performance commitments and WRMP19 targets** We are concerned that, based on the draft WRMP data tables, the company does not forecast to deliver its PR19 performance commitment levels for leakage and PCC by 2024-25. We expect the company to deliver its PR19 and WRMP19 targets. Companies should not expect additional customer funding to address deficits resulting from under delivery in the current or previous periods. We expect the company to review its proposals in these areas for its final WRMP.	Our draft WRMP forecast was based on 2019-20, before the main impacts of Covid19 lockdowns. However, the next year we experienced a very significant impact from the pandemic, with PCC rising to 146.9 l/h/d. We believe it is important to produce realistic forecasts and the forecasts represented our best estimate at the time. In our revised draft WRMP24, which was based on 2021-22 (still influenced by the pandemic), we forecast that PCC would decline to 131.8 l/h/d (above our PR19 performance commitment level of 126.6 l/h/d), noting that we still expect some uplift due to societal changes post pandemic (working from home). However, due to the impact of factors including smart metering we have recorded our lowest ever PCC in 2022/23 of 131.3 l/h/d, and therefore we may still meet our performance commitment level. We are not forecasting that we will meet our leakage target, which is a risk-adverse position given the challenging weather conditions experienced in 2022-23; however, we remain committed to meeting the PR19 performance commitment.	Yes	Revised draft WRMP24 Demand forecast technical supporting document. Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 12, 13.5
6	Ofwat	**Business demand** The company's draft WRMP presents a 2029-30 business demand level that is 3% higher than the 2019-20 baseline level. The company also states that it has not built any business demand reduction measures into its draft plan but intends to do so for its final plan. We have previously highlighted the opportunity for companies to deliver business demand reductions and our expectations for WRMP24 are that companies deliver significantly improved levels of water efficiency in the business sector. We expect the company to set out robust options and clearly justify an ambitious strategy for non-household demand reduction in its final WRMP to inform its PR24 business plan.	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50 (approximately 10Ml/d per 5 year AMP period). Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners. In total, these options help us achieve approximately 8% reductions by 2037/28 and 15% by 2049/50, but these reductions can only be achieved relative to the non-household demand position (including growth). We do not, therefore, believe that, achieving the absolute levels of non-household demand reduction, from the 2019/20 base-line, should be included in the revised WRMP24 plan, as this represents a degree of uncertainty with respect to the implementation of the newly developed options, which would not be prudent. As we prepare for WRMP29, we will trial options and their implementation, and develop options further for our WRMP29 plan, as we gain more experience. On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). Note this demand is not included in our potable water output or DI and, therefore, is considered an export and not part of our current non-household demand target assessment.		
7	Ofwat	**Business demand** The company's draft WRMP does not quantify the costs and benefits for work to reduce non-household consumption, but it should include these in its final plan.	On the basis of our consultation (in association with WRE and 'Blue Marble') we have designed a number of water efficiency options concentrating on smart meter targeted water efficiency visits and leakage reduction. These options have been quantified in detail in terms of cost and benefit, based upon the type of sector/business customer in each cohort and the type of option being described (water audit, leakage reduction). These values are described in our revised draft WRMP24 technical supporting documents.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9
8	Ofwat	**Business demand** We also expect the company to explain how the revisions it intends to make to its non-household consumption trend impact the optimisation and best value option selection in its final preferred plan.	As part of the revised draft WRMP24 demand management option development process, and in conjunction with our WRE partners, we have engaged with our regional Retailers and business customers, in order to gauge opinion on further water efficiency measures for the business sector. This recent engagement (in association with WRE and 'Blue Marble') has been conducted; to understand the retailer perspective regarding the promotion of water efficiency; to develop and refine propositions and understand and overcome barriers; to explore these propositions and how they might be implemented with retailers and non-household customers. Based upon this we have developed a number of options that we wish to implement in co-ordination with our Retail partners. These options have been considered in partnership with other wholesalers in the WRE region.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			We fully understand that Retailers are best placed to delivery these options, but also realise, that as the wholesaler, we are in a position to design option and gain funding through the WRMP enhancement programme.		
9	Ofwat	**Per capita consumption (PCC)** The draft WRMP data provided by the company to date indicates that the company is proposing a three-year average PCC reduction over the 2025-30 period that will deliver a level of PCC 8.9% below the 2019-20 baseline by 2029-30. This represents a further reduction of only 3.3% beyond the company's 2024-25 performance commitment level of 5.6%. The company should consider and present more stretching PCC reductions in the short-term (2025-30) and support its selected reduction as being optimum with sufficient and convincing evidence. As the company further develops its forecast PCC performance trend from draft WRMP to final WRMP it should include the reasons for changes and explain the impact of any revisions on the optimisation and best value option selection in its preferred plan. We expect the company to provide sufficient and convincing evidence in its final WRMP to justify why its selected targets for demand reduction represent the best value approach to meeting a supply-demand balance or delivering long-term strategic outcomes.	As part of our demand management plan we forecast PCC at 109.74l/h/d for the DYAA average values (as described in the WRPG), in line with the EA/Defra target. This will be achieved through a combination of smart metering, water efficiency, behaviour change, plumbing loss reduction and government led interventions. The forecast reduction in PCC by 2050 is an 18.2% reduction from the 2019-20 baseline, with 5.6% being achieved in AMP7. As such a further 2-3% reduction would be required per AMP, making the suggested reduction of 3.3% proposed for AMP8 entirely reasonable. Accepting the recent volatility in PCC ranging from the very high level of 146.9l/h/d in 2020-21 to our lowest level of 131.3 l/h/d in 2022-23, and understanding that the main causes of these changes have been out of the control of water companies, we believe it would not be prudent to include lower assessment for PCC in the near term.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
10	Ofwat	**Leakage** The company is proposing a three-year average leakage reduction over the 2025-30 period that will deliver a level of leakage 20.4% below the 2019-20 baseline by 2029-30. This represents a further reduction of 4.0% beyond the company's 2024-25 performance commitment level of 16.4%. We expect the company to provide sufficient and convincing evidence of target testing and an explanation of its decision-making process and a justification for the selected leakage reduction in its final WRMP.	Whilst developing our revised draft WRMP24, we have considered all relevant targets and commitments that have been included within the regulatory framework. These targets have informed the envelope within which future forecast demand should be viewed and the ambitions that should be embodied in our demand management strategy. However, whilst developing our preferred plan, it must be understood that forecast projections are based upon current experience and analytical outputs, such that planning outcomes are rigorously based upon and reflect real demand data. Forecasts and outcome metrics have, consequently, been grounded upon: - the current position of Anglian Water with regard to key metrics; demand, PCC and leakage. - known measurements and actual out-turns (i.e. base-line data and current demand management option saving assessments) - agreed assumptions regarding future demand management option delivery and customer behaviours, based upon internal expert assessment and external peer reviewed research. - regionally agreed views regarding future growth (and demographic change). Thus, whilst we have been mindful that our revised draft WRMP24 plan should aim to achieve (or closely match) governmental targets, our planned out-comes have been based upon our current position with respect to key metrics and complex modelling analysis of future demand management impacts. Our full assessment of our performance against each target is described in our 'Demand management preferred plan technical supporting document'. As described we into to: - achieve a PCC of <110 (DYAA) by 2050. - reduce non-HH demand by 8% by 2038 and by 15% by 2050 (noting this must be relative to growth and not an absolute decrease from the 2020 base-line) - reduce leakage by 38% (to our current lowest feasible level), noting that this incurs significant cost (and 50% leakage has impractical cost implications). - reduce DI/person by 18.6 % by 2038 (accounting for the high level of non-household demand and non-household demand growth in the region).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 13 Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
11	Ofwat	**Leakage** Over the longer term the company's proposed 24% reduction by 2050 requires further justification. The company states that this reduction is appropriate as it has lower rates of leakage than others in the sector and that the amount of mains replacement required to achieve a 50% reduction in leakage would not be affordable, However, it should present further evidence and testing of alternative targets to prove the proposed 24%, or final WRMP target, is optimum over the long term, including interactions with other ways of resolving the supply-demand balance. If the reduction is less than 50% at a company level it should also present evidence that it has secured agreement on a bilateral basis with another company (or companies), within a regional group or at a national level that ensures the national level leakage targets will be delivered.	As part of our revised draft WRMP24, and in the light of our consultation, we have reviewed our leakage reduction programme. We have, consequently, included our maximum feasible leakage reduction programme, achieving a reduction of 38% (from the 2017/18 base-line) by 2050. This reduction is now more in alignment with the anticipated reductions from other water companies. Additionally it should be noted that if the 50% reduction for leakage is applied as a set of national attainment curves, Anglian Water will be below these targets by 2030 and very significantly below, by 2050. We are currently a frontier company for leakage, recording our lowest level of leakage in 2021/22. This means that more cost effective leakage reduction strategies have already been exhausted. We will, therefore, need to engage in significant mains replacement over the WRMP24 planning period (at a significant cost). This additional cost has been profiled to occur at later stages in the WRMP24 planning period, giving ample time to investigate technologies to mitigate and reduce the cost (due to mains replacement). We however, consider that this increased ambition indicates our commitment to meeting the overall national target and intend to investigate technological advancements that should mitigate this cost as we prepare future plans. Whilst developing our plan we have liaised with our partner companies in WRE with regards to each of our programmes for reducing leakage. However, it is not the responsibility of an individual company to ensure that a regional or national target is met, but a matter for companies and regulators.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 8 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
12	Ofwat	**Leakage** In its draft WRMP, the company has included schemes that "could potentially" involve finding and fixing customer side supply pipe leaks, up to a given value, for vulnerable customers. The company should provide more clarity in its final WRMP on whether it intends to implement these schemes. In addition, we are encouraging companies to evaluate the benefits of a common industry approach to addressing leakage on customers own pipes. We expect companies to provide a view on the benefits of a common industry approach in their statements of response and final WRMPs. We will support companies in the development of a common approach but expect the industry to lead on the development. The Water UK leakage route map to 2050 committed to an informed debate on customer supply pipe strategy by December 2022.	As discussed, smart meters are a key element in the identification of customer supply pipe leakage (detecting continuous flow). We are keen to develop our analytical systems and communications to help customers find and repair these leaks (either plumbing losses or customer supply pipe leaks) as fast as possible. We are also keen to help our most vulnerable customers with visits and incentives to fix these leaks as fast as possible. As we identify customer-side leakage (both plumbing losses which impact per capita consumption (PCC), and customer supply pipe leakage (cspl)) we intend to initiate schemes to assist customers in vulnerable circumstances and customers with affordability issues, to fix these leaks. These will take the form of: -A scheme for vulnerable customers to fix leaky loos and leaky taps up to a capped value with potentially the provision of a small toilet rebate voucher (linked to vulnerability and affordability). (Note this will impact the PCC metric, not leakage). -A scheme to find/fix customer side supply pipe leaks up to a given value, for larger leaks P3 and above (P3, P3a, P2s, P1s) for vulnerable customers. (this would impact the leakage metric directly. -Improved delivery of our customer-side leakage journeys relating to P1-P4 break out leaks. This will include virtual and CSR customer-side leakage visits for reported leaks; providing expert advice to customers utilising online and video assessments for potential internal leaks, identified by smart metering. We will also offer a physical visit for customers, who need this service. These schemes have currently been characterised: Option - 4a - Scheme for customers in vulnerable circumstances and customers with affordability issues to fix leaky loos and leaky taps up to a capped value. If toilets cannot be fixed then provision of a small amount of toilet rebate vouchers again linked to vulnerability and affordability. Part of Drive to 100 day maximum target for leak run-time - For Plumbing Loss element Option - 4b - A scheme to fix all customer side supply pipe leaks for all customers up to a value of £500 for P3 and above. Part of Drive to 100 day maximum target for leak run-time - For cspl reduction element Option - 4c - further delivery of the the customer side leakage journeys relating to P1-P4 break out leaks. Includes virtual and CSR customer side leakage visits for break out leaks, providing expert advice to customers through online and video assessments for potential internal leaks identified	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			by smart metering. Offer of physical visit for customers who require it to help identify location of the leak particularly those in vulnerable circumstances.. Part of Drive to 100 day maximum target for leak run-time Option - 4d - Leaky loos campaign (base option). This is a continuation of a service we offer in PR19 for non-smart, remaining cohort of visual read customers Option - 4f - Network leakage detection: sensor development to add pressure and noise sensors into smart meters to provide online network leakage monitoring and early warning. We have quantified initial costs and benefits for these options as described in the 'Demand management preferred plan technical supporting document' report. We are currently stating to trial the implementation of these options and how best to engage with vulnerable customers prior to full roll-out in AMP8. As our smart meter roll-out progresses, we are, however, making significant progress in developing our 'customer leakage journeys' including leakage being flagged for customers through our mobile applications and 'virtual visits'. This has currently led to a reduction of 7.5 l/prop/d for continuous flows across our entre cohort. We will continue to work collaboratively with our industry partners to develop common approaches to this issue, while developing these options internally for trial and full roll-out.		
13	Ofwat	**Metering** The company explains that it intends to rollout smart meters so that 91% of its customers are metered and billed on a measured basis by 2030. This timescale is, in part, driven by the company having a high initial meter penetration. The company has selected a policy of using more sophisticated advanced metering infrastructure (AMI) meters rather than automated meter read (AMR) meters due to the extra benefits of having more granular data. The company's draft WRMP quotes metering benefits being achieved in the 7 to 9 £m/Ml/d range but when unit costs are calculated from the data in the WRMP tables, some are in excess of 25 £m/Ml/d. In its final WRMP the company must make the unit costs of demand management options in its selected plan clear and provide sufficient and convincing evidence that the activities are efficient.	During the development of our WRMP19 and WRMP24 programme for smart metering we reviewed both AMI (network connected) and AMR (drive by) meters. This trial process, indicated that the benefits of real time smart meter data were key to facilitating leakage reduction and behavioural change, reducing demand. We are now rolling out 1.1million AMI meters in AMP7 and intend to complete the roll-out in AMP8, as described in our plan. The company average cost figures for AMP8 are £6.40M per Ml/d. However, there will be some variation at WRZ level (noting their very different sizes) and through time (as meter replacement programmes are initiated).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 3

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
14	Ofwat	**Metering** We expect the company to provide sufficient and convincing evidence in its final WRMP to justify why its selected targets for demand reduction (leakage, PCC and business demand) represent the best value approach to meeting a supply-demand balance or delivering long term strategic outcomes. This should include evidence of target testing and a clear explanation of the company's decision-making process.	We have detailed all aspects of our preferred plan in our three demand related reports: Revised draft WRMP24 Demand forecast technical supporting document - this details the modelling processes that have generated our preferred plan. Revised draft WRMP24 Demand management preferred plan technical supporting document - this details our preferred plan and the reasoning that has informed our preferred demand management strategy. Revised draft WRMP24 Demand management option appraisal technical supporting document - this details our option appraisal process for the selection of our preferred plan. Our preferred plan, which involves the full roll-out of smart metering by 2030 and a leakage reduction of 38% (from 2017/18) by 2050, along with water efficiency options and non-household demand reductions, has been based upon robust and systematic modelling of options applied at a granular level (cohort by cohort). In deriving our plan we have been mindful of and taken into consideration: - Defra/EA targets and policy, - our baseline position with respect to leakage, PCC, non-household demand - projected growth for both household and non-household properties, population and demand and - realistic / feasible assessments of demand management option impacts. This has led us to generate out-turn values for PCC, leakage, non-household demand and demand per person, that are based upon realistic assumptions and pragmatic assessments.	Yes	Revised draft WRMP24 Demand forecast technical supporting document Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document
15	Ofwat	**Metering** As stated in our PR24 final methodology, we expect consistency between final WRMPs, companies' long-term delivery strategies and business plans at PR24. Any areas of variance between final (and published) planning frameworks and business plan submissions need to be fully explained, supported by compelling evidence. This should also include the reasons for changes and include confirmation that customers and the environment are not or will not be worse off.	The key data informing both WRMP24 and the PR24 planning tables has been aligned, with key outputs from the WRMP24 forecast model being used to derive PR24 outputs. Additionally we have used aligned datasets to inform the core preferred forecast for WRMP24 and the Ofwat Reference Scenarios, as referenced in the LTDS.	Yes	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
16	Ofwat	**Assessment of water needs** A robust assessment of current and future water needs is critical as it drives the gap between supply and demand and therefore impacts the scale of investment required for the 2025-30 period and beyond. We provided detailed feedback on Anglian Water's assessment of water needs in our preconsultation feedback in 2022. Some of our previous feedback has not been fully addressed in the draft WRMP, and has been raised again below. Anglian Water should provide sufficient and convincing evidence that the feedback has been addressed in the final WRMP.	We note the comments and provide additional commentary below. Note that we have developed a sophisticated modelling system to account for future demand factors, in order to produce robust demand forecasts. These factors include: - assessments of population and property growth, - non-household demand changes based upon regression analysis, employment and GVA changes, - impacts of demand management options - impacts of climate, weather, Covid-19, government led intervention	Yes	Revised draft WRMP24 Demand forecast technical supporting document
17	Ofwat	**Assessment of water needs** Anglian Water has used methods and data appropriate to the scale and complexity of the problem that it needs to address and has recognised the different problems across its area. The company's problem characterisation is clearly presented. The key changes to the planning problem are described; growth, sustainability reductions and increased drought resilience are key drivers of investment for this plan. Anglian Water has used a 25 year planning horizon. Increasing the length of the planning horizon was subject to sensitivity analysis. Whilst the company has met the statutory requirement to forecast supply and demand over at least 25 years, the planning period should be appropriate to the risks the company faces. Given the challenges and risks the company has identified, it may be more appropriate for Anglian Water to plan for the next 50 years. This is to ensure the WRMP identifies the right solutions to meet future pressures.	The guidance states that the planning period we use should be appropriate to the risks we face, with a statutory minimum of 25 years. However It may be appropriate, depending on our challenges and risks to plan for the next 50 years. The deficits in our plan are created by reductions to our abstraction due to, 1. Licence capping. 2. Drought resilience 3. Environmental destination 4. Climate change The first three reductions are all required to be met within the first 25 years of the plan. Projections for climate change show that the water available to abstract will steadily decline up to and beyond 2049/50. When our demand management forecast has been extended to cover 75 years, we have assumed a continuation of growth beyond 2049/50. However, if we continue with our strategy to use demand management to offset the net increase in demand due to growth, our demand beyond 2049/50 could remain at similar levels. Our Revised draft WRMP24 Decision Making technical supporting document shows that the deficit by 2049/50 is significantly greater than deficits later in the plan. If demand management is extended beyond 2049/50 the deficits are driven by climate change. Our most likely scenario is based on BAU+ level of environmental destination, if we were to change to the more challenging Enhance scenario in the future this would still be within the first 25years of our plan. Given the challenges and risks we face and the uncertainty with planning further into the future, it is appropriate for our plan to be based on 25 years. However we test our plans to ensure they can adapt to further future pressures by carrying out sensitivity tests for 50 years. It should also be	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			noted that our investment model completes assessment of option costs over a 80 year horizon and selects the least cost combination to satisfy the deficits within the planning period set, in our case 25 years.		
18	Ofwat	**Assessment of water needs** The company's supply demand balance starting point for the draft WRMP24 is significantly lower than its forecast for the same point in the final WRMP19. The reduction in available water for 2025-26 is equivalent to 9% of company water demand (distribution input). Although some of the changes are due to supply-demand balance reporting updates, there is still insufficient evidence to understand changes in some areas. In some areas, the evidence suggests that non-delivery or underperformance is the cause. We are concerned about the company not meeting expected WRMP19 leakage and PCC levels, and we are concerned about changes to assumptions around the water balance including population, dry year uplift and process losses. As a result, we are not clear whether the overall outcome of the WRMP19 as funded at PR19 has been delivered in the round. The company should fully quantify and justify the reasoning for changes between WRMP19 and the starting point for WRMP24 at a supply-demand balance component level with sufficient and convincing evidence.	A summary comparison figures of the WRMP19 and WRMP24 demand and supply forecasts is provided in the Revised draft WRMP24 Decision Making technical supporting document. The Revised draft WRMP24 Demand Management Preferred Plan technical supporting document compares the WRMP19 and WRMP24 demand forecast and describes and explains their differences. Section 12.4 of the preferred plan report describes how the WRMP19 2020 to 2025 demand management options have been integrated in to the WRMP24 forecast. The Revised draft WRMP24 Supply forecast technical supporting document describes and justifies how Deployable Output has changed at WRZ level between WRMP19 and WRMP24.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5 Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 12 and 13 Revised draft WRMP24 Supply forecast technical supporting document, Sections 4 and 11, and Appendix
19	Ofwat	**Assessment of water needs** Anglian Water has demonstrated improved understanding of demand following the Covid-19 pandemic. Uplift factors for household consumption have been included and the company states these will be reviewed before the final WRMP, based upon further post Covid-19 pandemic analysis and monitoring.	For our revised draft WRMP24 submission we have now moved our base-line for the forecast from 2020/21, a stable view pre-pandemic, to a post Covid19 base-line position of 2021/22. We have, consequently, reviewed our inclusion of Covid factors to reflect the fact that we were still experiencing some impacts of Covid19 in 2021/22, due to social changes and working from home. We expect these effects to subside and as such have applied a reducing Covid19 impact in our forecast. We continue to closely monitor consumption impacts due to the pandemic and will reflect this in our future forecasts and assessments.	Yes	Revised draft WRMP24 Demand forecast, Section 12
20	Ofwat	**Assessment of water needs** On the whole, Anglian Water has calculated available supply in line with guidance, and statistical approaches have been used. Target headroom is defined but not addressed in the main plan, with more detail being provided in the 'Planning Factors' appendix. Improved sign posting to relevant appendices would improve the final WRMP.	We have improved the sign posting throughout our Main Report.	Yes	Revised draft WRMP24 Main report

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
21	Ofwat	**Assessment of water needs** Anglian Water's raw water losses allowance is very high compared to most other companies', at over 7.5% of the company distribution input. This planning assumption contributes significantly to the company supply-demand balance and need for investment. The company needs to present sufficient and convincing evidence that the raw water loss allowance is appropriate in both the short and long term, that it is not driving unnecessary and high regret investment and must set out how it has considered options to reduce its raw water losses.	It should be noted that we rely on double abstraction for nearly half of our supply, whereby water is first abstracted from a river into a reservoir, and then from a reservoir into treatment. Furthermore, it should be recognised that process losses from our reservoir WTWs are typically not true losses, in that most are returned to the reservoir and therefore available for re-abstraction. Process losses are included within the modelling simulation to avoid over- and under-estimation of deployable output. Data is based on empirical evidence, although further work is underway to improve this. We have developed 13 supply side options (11 more than were in the draft) to reduce process losses. The combined DO of these options is over 4 Ml/d, with the potential for that to increase to over 10 Ml/d in detailed design. Currently, water treatment works MOTs are being conducted by our Asset Health teams. Two of the key components of this work are to identify flow meter maintenance needs and raw water losses. The timing of the delivery of our Backwash Recovery options (2028) and outcome of WTW MOT analysis should coincide, and if the findings suggest we need to, we will develop new options for inclusion in WRMP29. Two of our largest capacity WTW have known significant losses, one of which is to be addressed with drought measures being delivered this AMP (Grafham WTW) and the other is Covenham WTW. The option LNE12 will not only increase the current capacity of treatment but also reduce losses. These combined will have a significant impact on our loss figures. We also have maintenance programmes (non WRMP) which will reduce raw water losses including end to end raw water main flowmetering - a 10 year programme that will give us monitoring and leak detection ability on over 600km of raw water mains.	Yes	Revised Draft Supply forecast technical supporting document, Section 4 Revised draft WRMP24 Supply-side options development technical supporting document, Section 5
22	Ofwat	**Assessment of water needs** Anglian Water has included some details of benefits of the WRMP19 interconnector programme on the WRMP24 baseline in the WRMP technical document. For the final plan, this detail on interconnector benefits should be expanded further to set out that the benefits of other funded PR19 activities have been appropriately factored into the draft WRMP24 baseline supply-demand balance. The intended delivery and progress of PR19 schemes is inconsistently presented in the company 2021-22 Annual Performance Report (APR), draft WRMP and query responses.	The WRMP19 interconnectors are integrated into our EBSD model as baseline 'existing transfers' which are available in the model from 2025 (the start of the forecast). Existing transfers benefit Water Available for Use and the Supply Demand Balance by providing inter-Water Resource Zone connectivity, which enables water to be transferred from zones in surplus to those in deficit. In our Revised draft WRMP24 Decision Making technical supporting document we detail the integration of the WRMP19 scheme benefits into WRMP24 and provide a figure showing the baseline deficit with and without the interconnectors present, which illustrates this benefit. In this section we have also described the benefits attributed to the Alternative North Lincolnshire options, and how they interact with the WRMP19 interconnector options to enable distribution of resources from areas of surplus to areas of deficit.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
23	Ofwat	**Assessment of water needs** The company should provide granular details of the benefits of funded schemes and how and when these have benefitted the baseline supply-demand balance in its final WRMP.	In our revised draft WRMP24 Decision making technical supporting document we detail the integration of the WRMP19 scheme benefits into WRMP24, and provide a figure showing the baseline deficit with and without the interconnectors present, which illustrates this benefit.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5
24	Ofwat	**Assessment of water needs** Where a step change in supply-demand balance between WRMP19 and WRMP24 is not sufficiently justified as being due to changes to scenarios or planning assumptions and may instead be as a result of non-delivery or underperformance, this will be taken into account at PR24 in the assessment of enhancement funding.	In our revised draft WRMP24 Decision making technical supporting document we detail the integration of the WRMP19 scheme benefits into WRMP24, and provide a figure showing the baseline deficit with and without the interconnectors present, which illustrates this benefit.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5
25	Ofwat	**Assessment of water needs** It is important that WRMP19 supply- and demand-side options are on track ahead of WRMP24. We expect the company to make substantial efforts on delivering its schemes and demand reduction for the rest of the 2020-25 price control period, to ensure that WRMP19 forecast, and PR19 performance commitment targets are met annually, and to set firm foundations for delivering WRMP24.	We agree with the importance of our WRMP19/AMP7 strategy and we continue to make good progress on our demand and supply-side programmes. Progress is reported in the WRMP Annual Review.	Yes	WRMP Annual Review
26	Ofwat	**Assessment of water need**s Anglian Water has tested the timing of moving to 1 in 500-year drought resilience including several dates earlier than 2039 but only one date after, 2045. The company states that customers accept a 1 in 500-year level of resilience and agree with the 2039 date selected by the company. However, it is unclear how customers were engaged on this matter and what context was provided including what choices were presented and the bill impacts of those choices. This is important as the scale of bill impacts and the date for achieving 1 in 500-year drought resilience, are key drivers for scheduling schemes in the investment programme.	We engaged with our customers throughout the development of WRMP24, PR24 and LTDS. As part of this engagement we have asked customers their views on 1 in 500 year drought and its implementation. This engagement was conducted through quantitative and qualitative methods, at both a regional and company level. Details of these synthesised results can be found at https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/listening-to-our-customers/synthesis-report/. Following our consultation, customers have advised us that they would prioritise delivery of Environmental Destination in preference to 1:500 drought resilience. Our policy modelling for environmental destination has tested further timings of drought resilience in 2045 and 2049. This has shown relatively limited benefit in delaying drought resilience, because the same options would be required in each scenario, primarily driven by environmental destination. Our analysis has shown that the Lincolnshire Reservoir option, which is the key option required to achieve 1:500 drought resilience is triggered by the timing of environmental destination. This means that even if drought resilience was delayed, it would not result in a significant cost reduction against our core pathway because the Lincolnshire Reservoir would already have been constructed.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
27	Ofwat	**Assessment of water needs** The limited presentation of testing seems to highlight that the 2045 date for achieving 1 in 500-year resilience performs better across most metrics including programme costs (both opex and totex). The selected date to achieve 1 in 500-year resilience should be justified with sufficient and convincing evidence based on testing and optimisation using costs and benefits.	Our WRMP24 must deliver resilience to a 1:500-year drought event and the WRPG states this should be achieved by 2039 and with reduced frequency of management options such as permits. For our Revised draft WRMP24 have extended the range of dates to test for the optimal time to achieve 1:500 ranging from 2025 to 2049. We have also included further scenarios to test the effect of including drought management benefits within our forecast, and to understand if 1:500 drought resilience could be delivered earlier when these benefits are included. We found that delivering 1:500 drought resilience earlier than 2039 results in large cost, carbon and SEA impacts, while later delivery reduces these impacts only marginally. Changing the drought resilience date to 2045 or 2049 results in a similar portfolio of options, but with a delay linked to the selected 1:500 resilience date if considered in isolation to environmental destination. Earlier drought resilience significantly increases both capital and operational cost, whereas there is significantly less variability between 2039, 2045 and 2049. However, it should be noted that there is no benefit to delaying drought resilience once environmental destination is incorporated. The inclusion of drought permit benefits does not provide significant cost savings as they do not enable options to be delayed but could be considered as potential interventions as part of adaptive planning.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 5
28	Ofwat	**Assessment of water needs** The company has a level of service for imposing temporary use bans (known as hosepipe bans) on a frequency of once every 10 years. Although the company states that most customers agree with this frequency of restrictions it is unclear how the discussion was presented and what context customers were provided to inform decisions. This is particularly important in the context of the experiences of the 2022 drought. The company should provide sufficient and convincing evidence that the 1-in-10 year hosepipe ban frequency has been adequately discussed with customers.	At PR14, and then again at PR19, we had strong evidence that customers were satisfied with the current Level of Service for hosepipe bans and non-essential use bans and didn't see these restrictions as a priority area for investment. At PR14 this conclusion was drawn primarily from a second stage stated preference survey that tested water resource options and the frequency of service restrictions. The survey was undertaken in 2013 following the 2012 drought where we implemented a hosepipe ban. We also did some Drought/Water Efficiency research which suggested the majority of respondents had not been inconvenienced by the recent hosepipe ban. At PR19 we supplemented this with new research and drew the same conclusion that hosepipe bans and nonessential use bans are not a priority area for investment. New research included: -ICS and Eftec, 2017, Anglian Water, Water Resources Second Stage Research, Stated Preference Report -Incling, August 2017, 'Drought resilience: Exploring customer acceptance and buy-in' -Nera, 2017, Macroeconomic Analysis of Drought Impacts	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			Given the strength of this conclusion, we do not feel that it needs to be retested, even following the 2022 drought. It is worth noting that, after 2012 customers had recently experienced a hosepipe ban and still did not see it as a priority area for investment, whereas Anglian Water did not implement a hosepipe ban in 2022. This decision is in line with our customer engagement strategy for PR24, that aims to build on existing research and to be proportionate.		
29	Ofwat	**Assessment of water needs** The company policy choice of aiming for environmental destination abstraction reductions by 2035 in some zones is driving the need for significant investment in the 2025-30 period. This includes the selected delivery date for the Fens reservoir. The company should present sufficient and convincing evidence for why this timing is appropriate given the uncertain need for these abstraction reductions, and the changes in cost and benefits of delaying the delivery of the environmental destination abstraction reductions to 2040.	This is incorrect, it is licence caps and not environmental destination which drives investment including the Fens Reservoir. Our initial most likely scenario, which is the starting point for developing alternative plans includes the profiled environmental destination scenario from the policy decision modelling. In this scenario the Fen reservoir is selected in 2036 to meet the combined need of licence caps and environmental destination, this becomes our Plan A. However, through our development of alternative plans we have developed a new scenario - the preferred most likely scenario. This scenario offers better value than the initial one, and has been used to develop our preferred plan (Plan B) and the least cost version (Plan C). These are the two versions of the plan we report in the WRP tables. Our preferred most likely scenario is based on meeting all permanent licence caps in 2036. This drives the need for the Fens reservoir. The reservoir creates a temporary surplus before the reductions for environmental destination are included in 2040. As part of developing our best value plan (Plan B) we look for opportunities to fully utilise all resource to deliver environmental benefits as soon as possible. We find that if we delay the drought resilience in our Ruthamford zones to 2040 this enables the surplus from Fens to be used to deliver some environmental destination benefits sooner to priority locations.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
30	Ofwat	**Options to meet water needs** Identifying an appropriate number and range of options to meet water needs is essential to ensure that customers and stakeholders have confidence that the preferred programmes are optimal. We are concerned that Anglian Water has not considered a sufficient range of supply and demand options given its baseline supply demand balance risk and the pressures faced. We queried how many unique options (removing sub-options) were included on the feasible list, how much water they could provide and what proportion of expected needs at 2050 these could meet. The response shows that the feasible options can meet around 295% of expected need of 445Ml/d. The company is particularly reliant on desalination options which makes up ~60% of the volume of water available to the company. We have concerns that Anglian Water's range of options is not sufficiently broad given its long-term water needs and the scale of investment it is proposing. We also recognise that there are challenges with water resources in the east of England that constrains options availability. The region receives comparatively low rainfall and there are sustainability issues associated with groundwater abstraction. This makes options development challenging. Anglian Water should take a broad and innovative approach to options to inform optimal decision making. This includes fully considering transfers in from neighbouring companies and regions, scalability of new and existing options, exploring options with third parties including nearby Internal Drainage Boards, and opportunities for water recycling options.	We believe we have identified an appropriate and range of options. We were keen not to present speculative options as feasible, where we are not in a position to define certainty of WAFU or provide realistic cost estimates. Overall, we consider that a feasible options list that could deliver 3 times our requirement is pragmatic and retains choice. Desalination is an option with a definable cost and benefit while providing a drought and climate change resilient resource. We will continue to explore new alternative technologies in future planning rounds, but to have desalination in our plan, alongside strategic reservoirs and pipelines, means we have secure sources of water as our core pathway. With the security of this in mind we have the opportunity to explore alternatives that we can include in future plans as adaptive pathways and, when confidence and certainty in those options grows, we may be able to substitute options. IDBs have been involved in the development of our strategic reservoir options and are also a stakeholder we're consulting with on our Marham abstraction relocation option. During AMP7 we have been enhancing our Digital Twin which is enriching our understanding of our surface water drainage systems. Equipped with this learning we want to advance options to utilise this resource. This may be through direct reuse - diverting surface water to a user - or indirect, through advanced treatment of aquifer recharge (or a combination of both). However, these are not well enough developed to be able to define the benefits or accurately estimate costs. Therefore we feel it is inappropriate to include this in our WRMP, however, there are some examples elsewhere in our Business Plan (DWMP, WINEP, LTDS) and we continue to explore and develop more. We are engaged with various catchment partnerships, learning and using that to inform catchment level opportunities that we will explore both as a company and through WRE.	No	Revised draft WRMP24 Supply side options development technical supporting document, Sections 3 and 4
31	Ofwat	**Options to meet water needs** There are multiple feasible options within most option types identified, however the final WRMP should provide more narrative to explain how the scale of options is appropriate for the need in each WRZ and how the scale and range of options provide flexibility to the decision-making optimisation process. The company should provide sufficient and convincing evidence in its final WRMP that the number and range of options is appropriate given the presented scale of challenge, including at a zonal level.	We are satisfied that the number and range of options is appropriate given the scale of our challenge. We have developed a diverse range of options at a range of capacities that can fulfil the long term needs of each WRZ . Where there is opportunity to enhance existing resource we have options to deliver that, and those are the options that can be delivered earliest. In resource zones that have limited or no opportunity to develop new resource options we have developed a number of transfer options. Each zone has the potential to be connected to all neighbouring zones in either direction and different capacities. This allows the modelling to select the optimal	No	Revised draft WRMP24 Supply-side options development technical supporting document, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			set of resources and transfers to distribute that resource. This means we utilise resource close to its source where possible and distribute if efficiently where transfer is necessary.		
32	Ofwat	**Options to meet water needs** The company only presents a high-level description of the screening process to identify feasible options from the unconstrained list. The company should outline the criteria used at each stage of the process, explain why the criteria are appropriate for that stage and provide sufficient and convincing evidence that the criteria have been consistently applied and the reasons for options being rejected.	Enhanced detail has been added for revised draft WRMP24.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document, Sections 3, 4 and 6
33	Ofwat	**Options to meet water needs** Ten third party options are identified in the company's draft WRMP data tables of a total 428 options, of which half are imports and rejected from the feasible list. No non-incumbent water company third party options feature in the companies feasible list. There is insufficient evidence that the company has met the expectations around the identification and fair treatment of third-party options as described in the water resources planning guidelines. This includes a lack of description of its approach to third party options. Companies should take an active engagement role and support third-parties in their provision of information and analysis as part of the development of third-party options. We expect sufficient and convincing evidence in the final WRMP that all parts of the guidance have been appropriately followed in relation to third party options and that the lack of third party options in the company preferred plan is low regret best value.	We have actively sought third party options through the upstream water resources market, including through co-sponsoring a web-based platform which displays our Market Information data. However, it must be recognised that there are severe limits on the availability of resources in our region, with many third parties losing part or all of their own abstraction licences. The revised draft WRMP24 Supply-side options report describes the bid assessment process and how a third party bid 'Extreme Drought Resilience Service' has been managed. We have engaged with the supplier on several occasions to improve their understanding of the our needs and to help adapt the service they offer to suit those needs best. We have assessed the latest version of the proposal received through the bid assessment framework and modelled the deployable output of each option. We have then used this along with the costs provided in our EBSD modelling. We have also worked with another third party on the development of an option to introduce water from historic mining activities. This option is not sufficiently mature to include in our feasible or constrained option set. However, we are continuing to explore this as a potential to provide supply side options. We are looking at the feasibility of using the resource for aquifer recharge or river augmentation as well as nature based solutions. In both instances we have upheld the principles of of the process by: Being transparent. We have had online meetings with the bidders to understand the nature of their proposals and to advise on how to best develop and enhance the bid such that it can be assessed fairly against alternatives, ultimately working towards their ability to submit a 'pre-bid' form. We have discussed water quality, environmental and practical logistic aspects of the proposals in order that we can fully understand the scope, benefits and limitations of the resource available.	Yes	Revised draft WRMP24 Supply side options development technical supporting document, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			Giving equal treatment to the options - by using the same modelling tool (AQUATOR) to assess the Deployable Output of the option as we use for all new resource options and by assessing the option against others using our EBSD tool. Applied a proportional approach by only specifying unalterable constraints that must apply to all options regarding environmental impacts - for example INNS risk assessments. The bid assessed regarding utilisation of water available from mining activities is less mature and is the subject of ongoing feasibility review. We are also in the final stage of securing a water trade (partial licence acquisition).		
34	Ofwat	**Options to meet water needs** The costs for supply side options do not appear to consider uncertainty. Some limited consideration of uncertainty in options benefit has been considered, however the final plan should include additional narrative on this. Modular solutions have been investigated, though, as a way of allowing for uncertainty in options.	Optimism Bias has been applied to options to reflect the potential cost implications of uncertainty. The magnitude of the % applied has been calculated using the All Company Working Group methodology. We have considered uncertainty in deliverability of options too - this mostly pertains to uncertainty in securing new or revised abstraction licences. We are developing adaptive pathways to mitigate these risks. Uncertainty in delivery timescales and delays have been considered too. This largely pertains to large complex schemes - e.g., strategic interconnectors and reservoirs - and adaptive pathways have been developed with clear decision making points identified on the timeline.	Yes	Revised draft WRMP24 Supply side options development technical supporting document, Section 5
35	Ofwat	**Options to meet water needs** Anglian Water has not provided sufficient information regarding option utilisation in its draft WRMP. Extra information was provided to Ofwat on utilisation after querying. We expect to see more robust evidence on utilisation in the final WRMP, in line with feedback in our preconsultation feedback letters to fully explain and justify the utilisation rates given and to provide evidence that modularity and scalability in optioneering has been fully considered and explored to manage low utilisation situations. We require clearer and detailed evidence in the final WRMP that operational interventions have been considered and will be implemented where appropriate if this is the best value solution.	We have provided average and maximum utilisation within the WRP data tables. Further information has been provided in a supplementary excel spreadsheet, which follows a similar format to that requested by Ofwat during following draft WRMP submission.	Yes	WRP data tables and supplementary utilisation spreadsheet.
36	Ofwat	**Options to meet water needs** The narrative is inconsistent in references to which cost data has been used for the Fens reservoir and South Lincolnshire reservoir. The main plan (section 7.9) states that RAPID gate one data has been used, whilst the Decision making appendix states that the company has used the latest emerging gate two costs. This inconsistency should be addressed in the final WRMP.	The latest emerging gate two costs were used for the draft WRMP24; there was an error in the Main Report. We have addressed this consistency in the revised draft WRMP24.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 3

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
37	Ofwat	**Options to meet water needs** Fens reservoir has a comparatively high unit cost of £20.37m Ml/d. This is against an average unit cost for new reservoirs across company WRMPs of £9.34m Ml/d and is significantly higher than the South Lincolnshire Reservoir which is £11.01m Ml/d. This is a large project which will require significant investment. Anglian Water should provide clear and robust evidence around its selection of Fens reservoir, and the best value least regrets size and yield, in its final WRMP and present a clearly evidenced and thought-through approach. This should include consideration of other options to increase the yield of the Fens reservoir.	In response to the consultation feedback to provide more evidence of the selection and size of the reservoirs, we have not modelled the regional plan options as 'must do', instead they are unconstrained and the model is free to select the preferred size of reservoir to suit the scenario. The EBSD model has freely selected the Fens reservoir as part of a system-wide optimisation. In doing so, the model is not making a general comparison across company WRMPs, but a specific comparison against the next available options to Anglian Water (e.g. desalination and interconnectors). We have been engaging with the Environment Agency to identify other water sources to the Fens Reservoir to support the SRO yield, including from the Mid Levels and the River Nene catchments.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 6
38	Ofwat	**Options to meet water needs** The company should provide assurance that costs for Fens reservoir and the South Lincolnshire reservoir used in modelling are the latest costs.	Internal assurance has been undertaken to ensure that our modelling has used the latest costs for Fens and Lincolnshire reservoirs.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 3
39	Ofwat	**Decision making and prioritisation** Anglian Water has described how its best value WRMP is informed by the relevant regional plan. The explanation around decision making is provided and standalone at the company level, including of its 'least worst regrets' analysis. The high-level decision-making approach and decision support tools used are aligned with the company's view of its problem characterisation. Identification and consideration of best value metrics have line of sight to the plan objectives. The company has considered a wide range of economic, social and environmental benefits that the options can deliver. Anglian Water has not referred to Ofwat's public value principles, although the plan adheres to most of the principles. We would like Anglian Water to use Ofwat's public value principles within its best value planning process in its final WRMP and explain how the principles have been used to inform preferred plan decision making.	Our best value decision making process is aligned with the Ofwat public value principles, we have summarised this in the revised draft WRMP24 Decision making report. More widely, at company level we address the public value principles during scheme delivery via our six capitals value framework, which will be explained in further detail within our PR24 business plan submission.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 3
40	Ofwat	**Decision making and prioritisation** Where investment is needed beyond least cost, the value of the additional benefit needs to be presented within the WRMP planning tables. The robustness of this valuation data in the WRMP planning tables is important for significant areas of investment, and will be used during PR24 analysis to validate and justify funding decisions between least cost and best value plans.	We have presented this information in the planning tables as required.	Yes	WRP Tables

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
41	Ofwat	**Decision making and prioritisation** Anglian Water has considered in combination assessments at a programme level as part of the best value plan assessment. This was considered in the environmental assessment, habitat regulation assessment, Biodiversity Net Gain and Natural Capital Assessments. However, there is no mention of in combination assessments for deployable output.	We have carried out in-combination impacts of larger schemes on Deployable Output, such as between the Lincolnshire Reservoir and GUC, however, this has not been carried out for the smaller options. Further work is planned using PyWR.	No	N/A
42	Ofwat	**Decision making and prioritisation** Significant benefits of approximately 237 Ml/d have been identified by the company relating to interconnection schemes in the 2025-30 period alone. Anglian Water proposes to invest £482 million in interconnecting its network in the 2025-30 period. The company should ensure the benefits it has identified for these schemes are sufficiently evidenced in the final WRMP.	The 237 Ml/d of benefits in the draft WRMP table was calculated by summing the transfer capacity of the 10 individual interconnect schemes required by 2030. As transfers, the purpose of these schemes is to move water from areas of surplus (and where new resource is being created) to areas of deficit, rather than creating new resource.	No	N/A
43	Ofwat	**Decision making and prioritisation** Additionally, the company may have schemes where interconnectors are necessary to deliver new supplies to areas of demand. In such cases the schemes should be evaluated by combining the costs of developing the new supply with the interconnector costs as a single option to produce an optimised best value plan.	The EBSD modelling process is based on a system-wide optimisation. If interconnectors between WRZs were directly linked to new resources in a single WRZ this would constrain the model and potentially create a sub optimal solution. For example, the model may find that a combination of smaller transfers between adjacent WRZs is more optimal than a single larger transfer. If one of these options had been predefined before the modelling, the model would have been be unable to optimise between the two. New resource options such as desalination options do include pipelines within their cost. In a desalination option example, these pipelines are designed to move the new resource from the coast to a central distribution point within the WRZ. From this point, interconnector options can then be freely selected to redistribute the new resource between other WRZs where considered optimal within the model.	No	Revised draft WRMP24 Supply side options development technical supporting document
44	Ofwat	**Decision making and prioritisation** Table 4 (Options Appraisal Summary) includes a column to flag interdependent options. These are options which are dependent on one another to occur. This is particularly relevant to some of the internal potable transfer options that Anglian Water propose, moving water from new supply options such as the South Lincolnshire reservoir and Fens reservoir. We expect the company to ensure that interdependent options are flagged through this table to ensure clarity when regulators review the company's options appraisal and selection. The company should review interdependencies between its options and ensure that this is clearly explained in its final plan and that its data tables are also completed in full.	Table 4 has been completed correctly. For example, the SRO investments (e.g. FND19) include pipelines to move the new resource to a central distribution point within the same WRZ, but onward transfers of the new resource - via interconnectors to where it is needed in other WRZs - can be freely selected as part of the system-wide portfolio optimisation.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
45	Ofwat	**Decision making and prioritisation** We also reiterate our pre-consultation feedback, which aligns with the WRMP guidelines, that sub zonal schemes (not impacting on zonal water available for use (WAFU)) can be discussed within the narrative of the WRMP to provide context but they need to be presented and justified with sufficient and convincing evidence in PR24 business plans rather than the WRMP. When presenting such enhancement schemes companies should clearly identify how they have assessed the degree of overlap with activities it is funded to deliver through base expenditure. Companies should not expect additional customer funding to address risks resulting from under delivery in the current or previous periods.	One sub-zonal scheme in the PR24 business plan can be associated with WRMP24. The scheme involves improving sub-zonal connectivity within Suffolk East WRZ by creating a connection between the interconnectors developed in WRMP19 and Bramford Tye WR in the north of the zone. The scheme is primarily required due to the change from capping our groundwater abstractions based on recent actual peak to recent actual average. WRMP19 was planned on the basis of groundwater licences being capped to recent actual peak in 2024/25. Since WRMP19, following a change in policy from the Environment Agency, we must plan to cap our abstraction licences to recent actual average either on renewal (for time limited licences) or by 2030 for permanent licences; this has been reflected in WRMP24. This creates a further 4.25Ml/d (6.3%) reduction in the Deployable Output of Suffolk East (based on WRMP24 modelling), which is concentrated in the groundwater supplied portion of Suffolk East WRZ. Our WRMP24 WRZ integrity assessment and problem characterisation were completed in September 2020, before this change occurred, so did not take this factor into account. .If this information had been available, it would be likely that the Suffolk East WRZ would have been split into two separate WRZs, making this scheme an inter-zonal interconnector.	Yes	Revised draft WRMP24 Supply side options development technical supporting document, Section 5
46	Ofwat	**Decision making and prioritisation** Anglian Water has used adaptive planning to manage uncertainty in its draft WRMP. The company accounts for uncertainties through adaptive pathways, scenario testing, sensitivity testing and, where parameters are more difficult to credibly establish, such as policy changes, has set out assumptions made in the draft WRMP. The company identifies decision points that take into account the lead times of solutions. It presents one main alternative pathway stemming from a trigger point in 2040, and shows how the scale of desalination options would vary according to outturn scenarios. In the final WRMP, the	Our preferred most likely scenario includes the BAU+ Environmental Destination abstraction reductions (-241 Ml/d). As part of defining the preferred most likely scenario, we have scheduled the Environmental Destination abstraction impacts to balance between early delivery in priority areas and avoid early commitment to desalination options which may cause regret if the required reductions are less than planned. As such, our preferred most likely scenario results in no desalination options being required before 2040, to enable the scale to be informed by the outcome of the AMP8 WINEP investigations. In 2040, the BAU+ abstraction reductions trigger three desalination options (Bacton Desalination (25Ml/d), Holland-on-Sea Desalination (25 Ml/d) and Mablethorpe Desalination (50 Ml/d). We have set out adaptive planning pathways describing the alternative approaches we would take in the case of the alternative BAU and Enhance Environmental Destination scenarios following the outcomes of the AMP8 WINEP investigations: -BAU (-180 Ml/d): The BAU scenario requires less abstraction reductions compared to BAU+ which is used for our preferred best value plan. In this scenario we would not require the Holland on Sea desalination plant and we could reduce the capacity of Mablethorpe desalination from 50Ml/d to 25Ml/d.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		company should explain more clearly how the investment activities, such as the size of the desalination schemes, will change in response to the different scenarios. The company should also clearly set out what level of abstraction reduction triggers each option.	- Enhance (-368 Ml/d): The scale of the abstraction reductions is significantly higher for the Enhance scenario, and we would need to increase the capacity of options within the preferred plan plus deliver additional options. Figure 128 shows that all three desalination options would need to be developed at a higher capacity, with Bacton at 50Ml/d and both Holland on Sea and Mablethorpe at 100Ml/d. We would also need to deliver two additional water reuse options at Kings Lynn/Wisbech and Ipswich. The outcome of the AMP8 WINEP investigations will give us clarity on the scale and location of abstraction reductions required to achieve Environmental Destination. In all potential future abstraction scenarios, desalination options offer the greatest potential in terms of scalability to meet the need, and their capacity would be changed to adapt to the scenario.		
47	Ofwat	**Decision making and prioritisation** We expect Anglian Water to test the Ofwat common reference scenario for low abstraction reductions, which is to 'assume only currently known legal requirements for abstraction reductions up to 2050'. Following the approach agreed between Ofwat, the Environment Agency and the regional water resources planning groups, companies should include agreed WINEP changes and licence capping, and use the agreed BAU+ scenario to form a long-term view, but use local reviews to remove licence reductions with significant uncertainty, to form a plausible 'extreme low' scenario.	Following agreement with our regulators, it has been confirmed that the BAU scenario should be used as the 'currently known legal requirements' scenario for common reference scenario stress testing.	No	N/A
48	Ofwat	**Decision making and prioritisation** Anglian Water states it has tested its plan against all the common reference scenarios. However, its stress testing 'fixes' the options it states it needs to commit to in 2025-30, then selects additional options according to each scenario. It is not clear how scenario testing has informed the judgement that these options are required in 2025-30. In its final plan, Anglian Water needs to demonstrate that scenario testing, including the common reference scenarios, has been used to identify low-regret investment that is required in all or most plausible futures. This should expose what investment should be undertaken regardless of future circumstances. We expect the company to present a core pathway in line with the WRPG definition that includes low-regret investment to meet future uncertainties and additional option value to allow further flexibility in the future.	In our revised draft WRMP24 Decision making technical supporting document, we present the results of sensitivity tests undertaken using each of the Ofwat Common Reference scenarios with an unconstrained option set. The results are presented in terms of the capacity and WAFU required for each scenario, the frequency of options selection within each scenario, and the cost of each scenario.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
49	Ofwat	**Decision making and prioritisation** As part of this evidence, Anglian Water should clearly set out the impact of the Ofwat common reference scenarios compared to the 'most likely' scenarios on which the preferred plan is based. This should include quantifying the impact on demand of the low and high scenarios for climate change, demand, and abstraction reductions across the planning period.	Our revised draft WRMP24 Decision making technical supporting document presents the supply demand impact of each of the Ofwat Common Reference Scenarios compared to the preferred most likely scenario, including the impact on demand.	No	Revised draft WRMP24 Decision making technical supporting document, Section 7
50	Ofwat	**Decision making and prioritisation** The company should also quantify the estimated impact on the expenditure requirement of: 1) planning based on the high scenarios for climate change, demand, and abstraction reductions, and the slower scenario for technology; and 2) planning based on the low scenarios for climate change, demand, and abstraction reductions, and the faster scenario for technology. This will allow for improved understanding of the drivers of investment, the sensitivity of the plan to future scenarios and confidence in the investments being proposed. The company should use the results of this testing to identify and justify with sufficient and convincing evidence low regret investments, rather than just ones that meet both high and low planning needs in a non-adaptive way.	In our revised draft WRMP24 Decision Making technical supporting document we describe the sensitivity testing we have undertaken using the Ofwat Common Reference scenarios. We have also carried out extensive least worst regrets analysis, We use this method to assess if we commit to the options required at the start of each plan based on each Common Reference Scenario and the future varies, how much additional investment is required to meet the future need. This allows us to understand which plans are better able to adapt to changing future circumstances.	Yes	Revised draft WRMP24 Decision making technical supporting document, Section 7 and Appendix C
51	Ofwat	**Long term best value programme** The company has proposed £1.2 billion of enhancement expenditure relating to delivery of its draft WRMP24 in the 2025-30 period. This is a large increase on the £696 million supply demand balance enhancement expenditure programme the company requested for the 2020-25 period at PR19. Over the 2025-50 period, the company has identified over £6.9 billion of enhancement expenditure. Anglian Water plans to deliver 39 Ml/d of supply demand benefit (excluding interconnectors) in 2025-30. During this period, the company proposes to deliver its total supply demand benefits at a higher cost in comparison to other companies. We have some concern around the company's proposed investment to deliver its metering improvements at a unit rate cost of approximately 25.6 £m/Ml/day across the 2025-30 period. This is significantly higher than the industry median unit rate of 7.5 £m/Ml/d. Anglian Water should demonstrate how its costs are efficient in its final WRMP, and carry this through to its business plan. In terms of whole life costs, including both operational and capital costs, Anglian Water has set out £7.1 billion investment over preferred options. This includes significant investment in two very high-cost options - desalination and the Fens reservoir.	The enhancement expenditure proposed is proportionate to the pressures our region faces in terms of water resources: it is the driest region, the fastest growing region, it is highly vulnerable to climate change, and has significant challenges in relation to environmental protection. The region is doubly impacted by these pressures because it leads to significant supply demand deficits, whilst also making it harder, and more expensive, to achieve further demand savings and source new supplies. Regarding metering improvements, we are not clear how the unit rate quoted was derived. Our own figures for AMP8 are £6.40M/Ml/d.	No	Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
52	Ofwat	The company chooses some options ahead of others with much lower unit costs. For example Fens reservoir is selected ahead of 15 other distribution and resource options with lower average incremental costs (AICs) that could supply the same zone. This includes two water reuse schemes. The company should provide sufficient and convincing evidence why higher unit cost options are selected over lower cost feasible alternatives. If the reason is wider value this needs to be quantified with robust valuations, and presentation that the value cannot be delivered more efficiently and effectively through other means aligned with Ofwat's public value principles.	Options are selected based a system wide optimisation using our EBSD model. Our modelling has shown that the Fens Reservoir is selected in our plan in unconstrained runs. Other options may have lower AICs, but their capacity may not be sufficient to resolve deficits in a cost efficient way compared to a larger capacity single option. The model also accounts for the most efficient combination of both interconnectors and resource options to create a 'least cost' optimisation of the network as a whole. For example it would account for the cost of combining multiple alternative combinations of both resources and interconnectors to supply each zone. The Fens Reservoir is also required by Cambridge Water within the WRE regional plan.	No	N/A
53	Ofwat	**Long term best value programme** The company should provide sufficient and convincing evidence that the preferred options being selected, across all areas of its plan, are best value in its final WRMP24 and ensure costs are reliable, efficient, and appropriately allocated, as well as continue to refine and develop detailed bottom up cost profiles to ensure a greater level of maturity of costings. We would encourage Anglian Water to engage with the market further to support this work.	Our consultants working on feasibility studies are experts in the field and develop options, similar to those being developed by us, across the world and have experience in design and delivery. The costings produced from their scoping recommendations are based on current benchmarking and these were reviewed in September 2022.Updates are included in the cost estimates produced for revised draft WRMP24. Our own cost models, particularly those relating to water mains, have been updated to reflect current market values as well as experience from main laying from our partners in SPA. We have carried out market benchmarking across our supply-side options. We will continue to revise and update where necessary, based on our experience of developing and delivering new options.	Yes	Revised draft WRMP24 Supply side options development technical supporting document, Section 5
54	Ofwat	**Customer and stakeholder engagement** Anglian Water has carried out a wide-ranging approach to customer participation and stakeholder engagement reflecting the significant challenges included in its draft WRMP. We welcome that there is strong engagement with retailers, which is clearly set out in the draft plan. Of particular note is the three-stage approach used to engage with a variety of retailers, at different levels appropriate to the issues discussed. Demonstrating how this built upon previous engagement, and how future engagement will build upon this work shows a good ongoing engagement plan.	We appreciate your positive assessment of our customer engagement process through draft WRMP24. We have continued this process with the draft WRMP24 Plan consultation, and have received and reviewed comments, which we have referenced as we have produced our plan for the revised draft WRMP24 submission. We have also consulted extensively with our Retail and business customer partners (including via WRE) to generate our non-household demand management strategy. We will continue to engage with all regional stakeholders as we deliver our WRMP19 and WRMP24 demand management strategies.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 4 and 9
55	Ofwat	The draft WRMP presents limited detail on partnership opportunities to enable co-funding and co-delivery. This should be detailed further in the final plan.	We have included further detail in the revised draft WRMP24 Supply-side option development technical supporting document on the partnership opportunities we have explored, and those we propose to investigate in the future. We also continue to explore these opportunities through the SRO programmes, WRE, fellow water companies, WINEP and our existing partnerships such as The Norfolk Water Partnership.	Yes	Revised draft WRMP24 Supply side options development technical supporting document, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
56	Ofwat	**Customer and stakeholder engagement** There is limited evidence provided to give confidence that customers fully understand and support the approach on areas such as the need for investment and the proposed solutions. We expect to see further clarity on this in the final WRMP.	We have engaged extensively with our customers throughout the development of WRMP24, PR24 and LTDS. We have discussed the drivers of climate change, drought, and environmental destination, as well as the trade-offs available to us. This detail can be found in the WRMP24 Customer and Stakeholder Engagement technical supporting document. Proposed solutions have been discussed as part of PR24 and LTDS, as it is important to us that our customers understand that WRMP options are only a proportion of our company's investment plans. Details of this engagement will be available in the PR24 and LTDS reports, with the results synthesised into our Synthesis Report; this is available at www.anglianwater.co.uk..	Yes	Revised draft WRMP24 Customer and stakeholder engagement technical supporting document
57	Ofwat	**Customer and stakeholder engagement** Specifically, there appears to have been limited engagement with customers in Hartlepool.	We have engaged extensively with customers in Hartlepool. We have made this more explicit in our revised draft WRMP24.	Yes	Revised draft WRMP24 Customer and stakeholder engagement technical supporting document
58	Ofwat	**Assurance** The draft WRMP programme for 2025-30 represents a significant uplift in expenditure compared to the PR19 programme. For its final WRMP we expect the company to provide sufficient and convincing evidence that the Board has challenged and satisfied itself that the WRMP and the expenditure proposals within them are deliverable in the context of the wider PR24 business plan proposals.	An addendum to our Board Assurance Statement for revised draft WRMP24 details the Board's involvement with the development of the plan. Further detail will also be available in the BAS for PR24.	Yes	WRMP24 Board Assurance Statement
59	Ofwat	The company should also demonstrate that it has put in place measures to ensure that the plans, of which the WRMP forms a key part, can be delivered.	Deliverability has been a key theme of our PR24 development process, and is something we have investigated extensively as part of WRMP24.	Yes	Revised draft WRMP24 Decision making technical supporting document, Sections 8 and Appendix C.

2.42 Phillips 66 Limited

No.	Consultee	Feedback from consultee	Our response		
1	Phillips 66 Limited	Phillips 55 Limited noted their potential water requirement for water to deliver net zero, and the importance of long term industrial water supplies for the Humber region.	We thank Phillips 66 Limited for their response and have included an assessment of their potential water needs for net zero in our revised draft WRMP24.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.43 Prax Lindsey Oil Refinery

No.	Consultee	Feedback from consultee	Our response		
1	Prax Lindsey Oil Refinery	Prax Lindsey Oil Refinery noted their potential water requirement for water to deliver net zero and the importance of long term industrial water supplies for the Humber region.	We thank Prax Lindsey Oil Refinery for their response and have included an assessment of their potential water needs for net zero in our revised draft WRMP24.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.44 Revlvel Association

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Revlvel Association	**Response to consultation question one** The Revlvel Association is supportive of the 2 new reservoirs however Anglian Water needs to consider all supply options to make sure supplies are enhanced across the region and not just in specific locations adjacent to new reservoirs. It is difficult to see how these new reservoirs will benefit Bedfordshire for example, but an appropriate water reuse scheme potentially could. You need to be meeting extra demand and driving environmental improvements across the whole region and need to have a variety of tools to enable you to do so, not just 2 large ones.	Thank you for your support of the reservoirs. Our plan has been developed at a regional system scale and includes both new water resource options, and interconnectors to transfer new water resources to where they are needed. Our best value plan includes additional transfer capacity to enable resources from the Lincolnshire Reservoir to support Ruthamford South WRZ, which includes Bedfordshire.	No	N/A
2	Revlvel Association	Revlvel support the concept of adaptive planning. Some agile thinking and willingness to deviate when opportunities arise that present positive long term environment gains at relatively low cost should be considered. Revlvel believe that water from Grafham Water reservoir is key to securing environmental improvements in the river Ivel and its tributaries (including the Cat Ditch, another troubled chalk stream).	We welcome Revlvel's thoughts on positive environmental benefits at lower costs, as part of our environmental destination investigations we will be conducting a cost-benefit analysis - we will engage with Revlvel as part of this work.	Yes	Revised draft WRMP24 Sustainable abstraction and environment, Section 7
3	Revlvel Association	A discussion needs to urgently take place between Anglian Water and Affinity Water. Water Resources East has consistently said it is against “out of region” transfers, so how is it that the Chess, Misbourne and Ver will all benefit from such a transfer in AMP8 (and beyond)? We note that following the commissioning of Sundon Treatment plant Affinity Water will be able to take 91Ml/d from Grafham Water as agreed with Anglian Water. Can we please have a breakdown of how this water will be allocated? What is preventing this water being moved back to the Letchworth/Baldock area to enable the John Lawson Ivel report recommendations to be adopted in full? This is a much better solution for Anglian Water and WRE as the water is retained within the Great Ouse Catchment and potentially available for reuse rather than being lost to the Colne catchment in WRSE.	Affinity Water are entitled to a share of Grafham Water, as set out in the Great Ouse Water Act. Anglian Water is not responsible for allocating this water to demand centres within Affinity Water's supply area. We will continue to work with Revlvel and Affinity Water on a potential joint solution for the Ivel.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
4	RevIvel Association	**Response to consultation question three** The RevIvel Association is supportive of a tiered system, but environmental improvements need to be delivered immediately to protect already damaged river systems such as the Rivel Ivel. Failure to meet demand or leakage targets should not be used as an excuse for the scaling down or slowing down of environmental targets. In the last 5 years we have seen many chalk streams severely degraded from North Hertfordshire to Norfolk with the loss of genetically unique flora and fauna. Environmental Improvements should not be dependent on Anglian Water's ability to persuade their customers to decrease per capita use to 110 lite /person / day.	Our revised draft WRMP24 Decision making technical supporting document describes how we have developed our licence capping strategy, working closely with our regulators. It describes how our demand management strategy will enable us to avoid deterioration in the period before supply options are available due to the longer lead times involved. The report also describes the additional process step taken to develop our preferred most likely scenario, which delivers licence caps as early as possible in priority WRZs. Within the revised draft Environmental Report, the strategic environmental assessment of the timing of licence capping is presented and the licence capping scenarios have been included within the assessment of the four alternative plans. In addition, the WFD Sub-report has highlighted the potential risks related to the deferral of licence capping.	Yes	Revised draft WRMP24 Decision making technical supporting document, Sections 4 and 6 Revised draft WRMP24 Environment Report Sections 5, 6 and 7 Revised draft WRMP24 WFD Sub-report
5	RevIvel Association	**Response to consultation question three** The RevIvel Association fully supports the need for prioritisation where abstraction should be reduced, and environmental benefits can be achieved. There should be a with a clear focus on chalk stream head waters and iconic tributaries of chalk streams. According to the CaBA strategy chalk streams should see total abstraction reduced to achieve A10%R (10 % of catchment recharge). We support the focus on the headwaters where abstraction reductions will provide whole river benefit by increasing biodiversity and enhancing recreational opportunities.	We welcome RevIvels support on prioritisation in terms of abstraction reductions. This will be explored further through the environmental destination investigations.	Yes	Revised draft WRMP24 Sustainable abstraction and environment, Section 7.
6	RevIvel Association	RevIvel are concerned about the transfer of water from Grafham Water via Sundon TP to facilitate planned licence reductions in WRSE region (Chilterns chalk streams) in AMP 8. In the same time frame the river Ivel in the Upper Ouse catchment has been identified in the top 5 chalk streams for over-abstraction nationally, yet has no improvement plan. We strongly argue that the Ivel is a better candidate for receiving water from Grafham based on dire need and proximity. Furthermore, RevIvel propose that it would be better that this water is used within the Upper Bedford Ouse catchment where it will be available for future abstraction and reuse as per the John Lawson solution for the benefit of the river Ivel. The Lawson report proposes significant reduction in abstraction at the headwaters of the Ivel allowing chalk water to flow down the Ivel, joining the Ouse at Tempsford and later being taken off at Offord for Grafham Water. Then according to Anglia Water /Affinity Water agreements, water is then transferred south to Sundon TP and onto the North Herts area. This would follow the principles of Chalk Streams First and the recycling of water back into the Upper Ouse catchment would benefit the Ivel and Ouse and WRE	A groundwater modelling exercise is currently being undertaken to understand the benefits of reducing abstraction/ceasing abstraction/river support in the Upper Ivel. Anglian Water are contributing technically and financially on this project and are actively involved in a solution. AWS are not expecting an increase in utilisation of the Grafham Export with Affinity Water, over and above the formal arrangement. An increase in utilisation beyond this arrangement would require detailed water resource modelling to understand the implications, both to Grafham Reservoir, and the downstream infrastructure.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		overall. The Great Ouse Act (1961, amended 1971) was passed in the 1960's to facilitate water transfer into the N Herts area, knowing that this area would be subject to water stress in the future. We believe that Affinity is not using their allocation from Grafham Water as originally intended. Can water from Grafham Water be better utilised within the Upper Bedford Ouse catchment rather than being exported from the WRE area?			
7	RevIvel Association	There is a current desk-based feasibility study on the Upper Ivel to evaluate the likely recover of downstream flows along the Ivel and beyond if borehole abstraction of chalk water at Baldock/ Letchworth is significantly reduced. If this desk study (due in 2023) shows the John Lawson solution to be workable then RevIvel propose a full or partial implementation in AMP 8. Switching off the borehole pumps may be considered a PILOT scheme and could benefit the Upper Bedford Ouse in the 2025-2029 timeframe. This would demonstrate that Affinity and Anglian Water are committed to the Chalk Streams First principle and are prepared to follow up a favourable report with action rather than further rhetoric. Using the Ivel as pilot scheme would also provide both water companies with a very positive PR win.	Regarding the work being done in the Upper Ivel, we are interested in the outputs of this work and how we can make the best use of the outputs in terms of the environmental destination investigations.	No	N/A
8	RevIvel Association	**Response to consultation question four** RevIvel support the focus on water efficiency and leak reduction. Environmental destination plans should not be linked in any way to the industry's ability to manage leaks or reduce per capita consumption. We support metering in water stressed areas and are supportive of a tiered approach to water tariffs above 110 litre / person/ day. Smart water meters in water stressed areas are key and should be installed ASAP. Anglian Water should fully exploit the data available from the smart meters to communicate with their customer base and encourage more responsible use. National Housing Planning policy needs to focus on embedding water consumption targets for new houses. Local government need to enforce/ regulate adoption. Industry should be encouraged to manufacture water efficient toilets/ showers, baths etc. Water companies should be part of this process. OFWAT should consider implementation of a tiered approach to domestic water tariffs where usage above the sustainable 110 litres / capita / day is penalised financially.	We appreciate RevIvel's positive comments. We are currently liaising with key partners to drive standards for new build properties and water using utilities (toilets etc.). All stakeholders including the government will need to collaborate to achieve the reductions in consumption that we will need to achieve sustainable abstraction. We plan to build upon our proven track record of delivering demand management savings, through our leakage reduction strategy, ambitious smart metering programme and innovative water efficiency initiatives. We will extend our ambitious programme of demand management options, in order to support our new revised draft WRMP24 plan; one that provides economic benefits, delivers substantial water savings, but is also achievable. Our ambition is to drive the next 'step-change' in demand management	Yes	Revised draft WRMP"4 Demand forecast technical supporting document Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		Anglian Water must be flexible in their application of tiered charging with genuine medical and social needs being appropriately exempted, but careless and unnecessary uses (private swimming pools, wasteful irrigation etc) being punitively priced. Anglian Water needs to accelerate its programme of leak minimisation rather than place all the onus on customers.	through: technological innovation, enhanced communication strategies, improved understanding of our customers behaviour, and the implementation of 'industry leading' water efficiency initiatives. Savings from our smart meter programme, leakage reduction and water efficiency options, in combination with government led interventions are expected to more than compensate for regional increases in demand due to population growth during the WRMP24 planning period. With our ambitious programme for full smart meter installation and associated water efficiency measures, our customers should achieve a per capita consumption of less than 110 l/h/d, in line with the 2050 National Framework Target. Note that this includes a significant impact from government led interventions ('white good' and water utility labelling and mandatory design standards). Additionally, we expect to achieve record low levels of leakage. We also intend to implement options, with our Retail partners, to reduce non-household consumption. As a water stressed area, and with the understanding that we currently have 90% of customers with a meter and 84% of customers billed on their measured consumption volume, we now plan to introduce a compulsory metering programme. Our customers have indicated that they see being billed upon measured volume as the fairest method for people to pay for their water. As part of our current plan we intend to fully leverage the opportunities that smart metering and our MyApp account tool will give us, to communicate the need for water efficiency in the region. This is detailed in our revised draft WRMP24 Demand management preferred plan technical supporting document. We are, however, very mindful of how this should be sensitively considered and introduced for those that we would consider to be our vulnerable customer cohort. We already have a number of tariff options to assist these customers and would be keen to ensure that any changes would be thoroughly explained with any relevant assistance included. We are currently developing our programme in close collaboration with our customer engagement groups. As part of our WRMP24, we are developing our 'Demand Management Monitoring Framework', which will utilise our smart meter data in order to validate and guide our future demand management strategies. We are also planning to undertake a tariff trial in AMP8.		

2.45 RSPB

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	RSPB	We are disappointed that the BAU+ environmental destination has been chosen for the Plan period with no commitment to work towards the 'enhance' destination, which would be in line with the Water Resources East Regional Plan and would consider SSSI designations as priority. Not all SSSI's carry European designations and would be left out of assessment and possible solutions. There is a great opportunity to build on the approach Anglian Water have taken within the catchment of the River Ant in the Broads. Maintaining water-dependent nature sites will be difficult if not impossible without having the highest ambition for the environment, let alone contemplating being able to restore and enhance water-dependent habitats and species. We hope that this ambition will be revised as further information about the environmental need for water is gathered - this should be a priority.	We understand the concerns raised around the level of ambition with the environmental destination scenarios, within our revised draft WRMP24 we will continue to use the BAU+ scenario, as agreed with the Environment Agency and recommended in the WRPG. We understand the need for ambition in terms of the environmental destination, however, this ambition drives further large scale supply-side options (such as desalination) to be picked within the plan period. We hope that our environmental destination investigations will further our understanding in the reductions needed and also explore alternative, more holistic options.	No	N/A
2	RSPB	The lack of detail regarding the design and location of supply proposals available to inform the current consultation has made it difficult for us to understand and comment on the environmental implications of the proposals.	In our WRMP we are not able to provide specific locations of proposed assets. However, the revised draft documents do contain more detailed on our proposed options.	Yes	Revised draft WRMP24 Supply-side options development technical supporting document, Section 6
3	RSPB	We also have serious concerns about the conclusions of the Habitats Regulations Assessment. The HRA is effectively deferring detailed assessments to project-level. This appears to be due to a lack of evidence being available to assess impacts. Having reviewed the HRA conclusions, we consider that it is not possible to rule out an adverse effect on integrity of several sites within the National Sites Network beyond reasonable scientific doubt. A separate assessment is also needed to ensure the SSSI network will also not be adversely affected. Consequently, we consider the plan would not be sound in its current format. We recommend that further consultation is carried out on these assessments, including with Natural England.	Following the draft WRMP24 documentation submission and consultation responses, including this one, we have revisited the Habitats Regulations Assessment to ensure it has an appropriate strategic plan-level focus. A separate assessment has not been completed for SSSIs as they are taken into account in the HRA and the SEA Objectives. We have engaged with Natural England on the revised draft approach for the assessment.	Yes	Revised draft WRMP24 HRA Sub-report Revised draft WRMP24 Environmental Report
4	RSPB	We are supportive of the need to develop demand management measures for householders but recommend that further consideration is given to measures for non-household users. In particular, we would like to see further investigation of the potential for nature-based solutions at catchment scale to manage agricultural demand and provide opportunities to enhance biodiversity.	Non-household consumption accounts for a substantial proportion of overall demand in Anglian Water, representing 27% of our total demand (2022/23). Understanding and forecasting this segment of demand is crucial to the demand forecasting process. We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50. Where feasible we have tailored	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (Those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9% and feasible target cohorts). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners. As part of our 'Demand Reduction Discovery Fund', we are keen to investigate innovative approaches including 'nature-based solutions' and 'water neutrality'. We will look to develop partnerships and collaborate in trialling these approaches as part of our innovation programme.		
5	RSPB	We also have substantial concerns about the significant reliance on desalination towards the latter stages of the plan period. There are significant gaps in the evidence base to demonstrate that such plants would not adversely affect the integrity of the National Sites Network.	We understand the concerns raised by the RSPB on the uncertainty of the environmental impacts of desalination plants, this is why we have a parallel adaptive planning programme. We recognise that desalination options take significant amounts of development time, therefore, several pieces of work will be completed to further understand the potential effects and investigation mitigation measures for these.	No	N/A
6	RSPB	**Response to consultation question one** We welcome the consideration of water storage but consider that a significantly greater focus should be placed on nature-based solutions to help improve water quality and maintain water within the environment that can support other sectors. We also consider that too much emphasis has been placed on supply-side options, and not enough on demand-side options. Whilst effort is clearly being made to strike the right balance, it does seem light on the use of	As part of our water resource strategy, we plan to build upon our proven track record of delivering demand management savings and our ambitious AMP7 programme, through leakage reduction, our ambitious strategy for smart metering and innovative water efficiency options. Our programme of demand management in AMP7, including the roll-out of over 1 million smart meters, will act as the foundation for our revised draft WRMP24 plan; one that provides economic benefits, delivers substantial water savings, and is also considered to be achievable. Our previous success, however, does mean that there is limited potential to achieve further savings through 'tried and tested' demand management activities (as demonstrated by our current meter penetration).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		nature-based approaches to address the water supply and management issues. Also, the focus on awareness building leading to behaviour change seems limited and should be strengthened; reducing demand will be essential and should be front-loaded to help get ahead of the predicted deficits by 2050. We appreciate upgrading the supply system is costly but accepting significant losses as a result of leaks seems to be at odds with the 'Love Every Drop' campaign slogan and overall premise.	Our ambition is to drive the next 'step-change' in demand management through technological innovation, enhanced communications and the implementation of 'industry leading' behavioural change initiatives. Savings from our full roll-out of smart meters by 2030, leakage reduction (to our lowest recorded levels), water efficiency options and non-household options, in combination with government led interventions are expected to more than compensate for regional increases in demand due to population growth throughout the WRMP24 plan period, leading to our lowest recorded levels for both leakage and per capita consumption. Note that we anticipate demand reductions of over 200Ml/d by the end of the planning period (2050), which will more than offset demand growth, but do entail significant risk. We, consequently intend to place robust monitoring measures in place to ensure that we understand where demand management options are successful and how we might make them more effective. We agree that innovative solutions such as 'nature-based solutions' and 'water neutrality' should be pursued and as part of our 'Demand Management Discovery Fund' we intend to collaborate with key partners in order to develop trails and test concepts.		
7	RSPB	**Response to consultation question two** We agree that focusing on demand management and water storage is appropriate, however, more nature-based solutions and smaller scale options should be developed in the shorter term with the aim to avoid the need for desalination in the long-term. We are concerned that over the long-term desalination is proposed to play a major role. This is a concern as the environmental impact of such schemes could be significant (including from disposal of the effluent/brine).	In our WRMP we identify a range of options spanning the entire planning period, to 2050. Through a number of partnerships and investigations, we are working to develop a diverse portfolio of integrated water management opportunities. Until we are in a position to accurately cost and model these options, in terms of the benefit in water we can supply to our customers, they are not included in our best value planning.	No	N/A
8	RSPB	Comments on desalination at Felixstowe- we are concerned about the proposed footprint of the desalination plant and associated infrastructure at Felixstowe which would be within the Stour and Orwell Estuaries SPA and Ramsar site and the Outer Thames Estuary SPA, particularly the conclusion that land take from pipeline construction will affect a small percentage of the sites' area and that adverse effects on integrity can therefore be ruled out. Direct habitat loss is likely to lead to changes to the extent and distribution of qualifying species as well as changes to supporting processes and the structure and function of supporting habitat. In our view, loss of habitat within a National Site would require a derogation case under the Habitat Regulations. We are also concerned about the proposed brine discharge within the designated sites above (with potential	We welcome the information shared by the RSPB for the Felixstowe Desalination option. Within our revised draft WRMP24 BVP, Felixstowe desalination is no longer selected within the BVP, however, other desalinations are still selected. As we are currently at a strategic plan-level, these options still require further development once at a project level. As the projects are delivered, we would welcome engagement with the RSPB to gather local knowledge.	No	Revised draft WRMP24 Supply-side options development technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		to affect neighbouring sites including the Deben Estuary SPA and Ramsar site) and note that significant additional work would be required to assess the impacts of such discharges on qualifying features. We note that it is acknowledged that adverse effects on integrity for the operational phase cannot be ruled out at this stage due to such impacts. Given the significant concerns around the proposals at Felixstowe, we recommend that this site should not be considered further unless significant advances in technology with regard brine discharge and refinements of the pipeline footprint (as suggested in the conclusions) enable adverse effects on integrity to be ruled out.			
9	RSPB	Comments on desalination at Caister- when considering the potential impact on the marine environment from release of brine into the sea, account must be taken of the inter-connected nature of breeding sites used by little tern. In recent years Winterton and Eccles have been used as favoured locations and in 2022 c40% of the UK population of little tern nested at Winterton. The species is extremely susceptible to disturbance and the impact of predators. Occasionally 'dread' events occur where the entire breeding colony deserts and sets up at an alternative location. Prior to 2005 (when a dread event caused the birds to desert from North Denes) both Caister and North Denes were favoured breeding locations. Creating a facility to desalinate water at Caister would remove this site as a potential nesting location and it is entirely feasible that Great Yarmouth would also be adversely affected as a result of longshore drift of water and sediments and the impact on prey species. It should also be noted that little tern nest at Kessingland Further it is entirely feasible that over time as a result of tidal movements additional salt could enter the Broads via the River Yare (and Bure) and impact Breydon Water. In a time of climate change where freshwater flows are episodic, altering the subtle balance between fresh and salt in the zone where both water types interact could have long term adverse impacts on both marine, freshwater and terrestrial ecosystems. RSPB urges great caution when assessing the need for and location of facilities to de-salinate water.	We welcome the information shared by the RSPB for the Caister Desalination option. Within our revised draft WRMP24 BVP, Caister desalination is no longer selected within the BVP, however, other desalinations are still selected. As we are currently at a strategic plan-level, these options still require further development once at a project level. As the projects are delivered, we would welcome engagement with the RSPB to gather local knowledge.	No	Revised draft WRMP24 Supply-side options development technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
10	RSPB	Comments on Fens Reservoir- we understand the need for a new public water supply reservoir in the Fens near Chatteris. We will continue to engage with the project team as this progresses, but re-iterate here that the reservoir needs to make full use of the opportunities it provides to mitigate flooding issues on the Ouse Washes SPA, provide additional priority wetland habitats both on and off the reservoir, and improve access to nature for local Fens communities. We see the reservoir provision as a key element in enabling the reduction of environmental impacts from ground water abstraction in Cambridgeshire, particularly on the internationally important chalk streams	We thank the RSPB for its comments. We will continue working with the RSPB and other stakeholders regarding the opportunity for the Fens Reservoir to help mitigate flooding issues in the Ouse Washes. The Fens Reservoir will incorporate new habitat and provide good access for local communities.	No	N/A
11	RSPB	**Response to consultation question three** We acknowledge that the 'BAU+' scenario has been chosen as the destination for the plan period but are disappointed that no commitment to work towards the 'enhance' scenario is made, in line with the WRE Regional Plan. Actions are required that deliver improved water quality, develop more resilient water management, that boosts biodiversity, enhances community wellbeing and ultimately helps tackle the nature and climate emergencies. Anything less than having the 'enhance' environmental destination as an ambition, risks purely maintaining the status quo. Maintaining water-dependent nature sites will be difficult or impossible without having the highest ambition for the environment, let alone contemplating being able to restore and enhance water-dependent habitats and species. There are now considerable drivers to improve the environment through targets set in the 25 Year Environment Plan and the focus on peat restoration etc. We do not feel that the plan is sufficiently explicit about the need to enhance the environment and ensure that there is suitable water available for habitats and species. This is a serious concern.	Within our revised draft WRMP24 we will continue to use the BAU+ scenario, as agreed with the Environment Agency and recommended in the WRPG. We understand the need for ambition in terms of the environmental destination, however, this ambition drives further large scale options (such as desalination) to be picked within the plan period. We hope that our environmental destination investigations will further our understanding in the reductions needed and also explore alternative, more holistic options.	No	N/A
12	RSPB	Greater understanding of environmental water requirements will be critical. This is a significant uncertainty in the draft plan and impacts on the predicted deficits. More information is needed to address this gap and provide greater certainty about the challenge facing different environmental receptors.	The Revised Draft WRMP24 Sustainable Abstraction and Environment Report provides detail on how the gap identified by the RSPB will be addressed through the environmental destination investigations.	Yes	Revised draft WRMP24 Sustainable Abstraction and Environment report, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
13	RSPB	Some issues we are aware of with regard environmental water needs and current issues are: -Changing water availability as a result of climate change - the difficulties of keeping habitat for breeding wading birds wet during the breeding season to enable birds to forage effectively -Water quality effects on biodiversity (including designated sites), with potential for consideration of nature-based solutions to help address impacts (e.g. reedbed filtration) -Over abstraction of aquifers, such as the Sherwood sandstone aquifer, used for both public and private supply. Whilst we acknowledge that recharge of this aquifer is considered within the Plan starting in 2035, focus is also required on demand management, (i.e., less abstraction) and the natural processes which can benefit aquifer recharge. This could include arable reversion to more natural habitats, such as wood pasture and grassland habitats which help to increase infiltration to the aquifer. -Invasive non-native species can be difficult to manage in many areas, for example, the spread of floating pennywort (Hydrocotyle ranunculoides) and New Zealand pygmyweed (Crassula helmsii) affecting wetland sites. Further trials of control methods may help address this -The interaction across water company boundaries especially where crag and chalk interfaces are common to allow assessment of impact from one zone on another, neighbouring zone. This includes transfer of raw water from one area to another in a Region which is collectively considered to be in a state of extreme drought stress	In terms of our environmental destination investigations, these issues regarding water availability, water quality, over-abstraction, INNS and interaction across water company boundaries will be regarded within the development of the environmental destination scope. It should be noted that an INNS assessment has been completed as part of the WRMP environmental assessment process.	Yes	Revised draft WRMP24 Sustainable Abstraction and Environment report, Section 7 Revised draft WRMP24 INNS Sub-report
14	RSPB	The need to look for water management solutions with multi-sector benefits, for example through re-using water which would otherwise be pumped out to sea or water drained from grazing marsh pumped out to rivers. These operations although not the direct remit of Anglian Water are significant factors and could provide solutions which in combination with those delivered through other industries and stakeholders could have profound impacts on the aquatic environment and intelligent water management principles.	In our WRMP we identify a range of options spanning the entire planning period, to 2050. Through a number of partnerships and investigations, we are working to develop a diverse portfolio of integrated water management opportunities. Until we are in a position to accurately cost and model these options, in terms of the benefit in water we can supply to our customers, they are not included in our best value planning.	Yes	Revised draft WRMP24 Supply side options development technical supporting document
15	RSPB	The complex nature of the supply network being proposed is adding to the 'water infrastructure' throughout the region. Additional infrastructure requires maintenance, increases the land loss and disturbance, and increases the potential for additional leaks. There seems to be a disproportionate focus on providing water and moving it around within	Our plan has an ambitious demand management strategy, including leakage, smart metering and water efficiency investments. A key objective set out in our best value planning framework was to ensure we optimise our existing available resource before building new resources, which has been supported by both customers and stakeholders. We have done this as part of the	No	Revised draft WRMP24 Decision making technical supporting document, Section 5

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		this draft WRMP. At what point does it become either too costly, unfeasible or unadvisable to add to the network and is time being lost tackling the demand-side options and changing customer behaviour?	development of our best value plan, both through prioritising demand management, and by including investments to upgrade our existing assets and increase their efficiency where possible. However, our modelling has shown that demand management alone is not sufficient meet the needs of sustainable environmental abstraction, drought resilience and climate change, meaning new supply options are required. Our Revised draft WRMP24 Decision making technical supporting document shows how our demand management policy decision has been assessed against supply options.		
16	RSPB	We also recommend that consideration is given to developing concrete proposals as part of an ambitious biodiversity net gain strategy. Potential options to consider could include the following: -Wetland enhancements including creation and rejuvenation of reedbeds on the Suffolk Coast for bittern, marsh harrier and other charismatic East Anglian species; recreating meanders along channelised water courses; pond creation for Natterjack toads; creation of saline lagoons; habitat creation for breeding wading birds, including through the Suffolk Wader Strategy -Habitat enhancements around water company assets for example, the creation of habitat for turtle dove, nightingale and dormice through scrub and hedgerow planting and management around reservoirs -Working with relevant Internal Drainage Boards to better manage the water resource within floodplains to recharge aquifers and promote infiltration to maintain a sustainable resource for public, nature and agriculture purposes.	We have included details on our BNG roadmap for the plan. Once individual options begin on a project-level, further work will be done on the BNG for the project.	Yes	Revised draft WRMP24 BNG and NCA Sub-report, Section 4
17	RSPB	**Response to consultation question four** We agree that metering is likely to help to reduce water use overall but note that for demand management to be successful, significant investment in behaviour change will be needed for all water users. The roll out of smart meters may help to identify where efforts need to be targeted, but behaviour change takes time and considerable resource. It needs dedicated	We recognise that developing our understanding of future demand, human behaviour and the potential for water efficiency, is a continual process. As our smart metering program is being implemented, it is giving us unprecedented insight into water consumption and is opening up new avenues for interacting with and understanding our customers. Additionally, the data that smart metering is providing, is key to monitoring our demand management interventions, in addition to demographic changes that will occur in the future. This will allow us to forecast future demand with ever greater accuracy for future WRMP plans.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		teams to be out working in communities and support individuals to understand why making changes to their water use is so important. It also needs water companies having a leading role in proactively taking steps to protect water reserves over multiple years, even if decisions may not be popular with water users and shareholders. A great deal of emphasis is placed on water efficiency in new builds, but the greater proportion of existing residential estate often gets missed. Affordable water efficient fixtures combined with focused attention on building awareness and changing attitudes towards acceptable levels of water use and choices made when selecting cleaning products and 'what gets flushed away' will provide that intelligent water management approach mentioned above.	Understanding customer attitudes, behaviours and societal influences with regard to their water usage, will be critical to the success of any future water efficiency objectives. We have a dedicated team devoted to customer communications, water efficiency and behavioural change. We intend to build upon our current understanding by: -conducting longitudinal studies into our customer base, to understand long term changes in behaviour. - developing innovative concepts of 'water neutrality' and 'smart communities' into strategic actions for implementation in future WRMPs. -researching new ways of understanding customer demographics and segmentation (cluster analysis and machine learning). triallng water efficiency initiatives with key stakeholders (including non-household options with retailers, water re-use options with developers and innovative irrigation systems). -development of our monitoring framework, in order to determine the long term benefits from our planned portfolio of water efficiency measures. -Researching methods of achieving ever lower levels of leakage and per capita consumption. Enhancing our understanding of human behaviour, with regard to water usage and the impact of our water efficiency strategies, will be key to improving our WRMP demand forecasting in future. We also intend to utilise our 'Demand management discovery fund' to further advance our understanding. We fully recognise that for water efficiency and changes in attitude to water usage, must impact our whole region and all customers will need to assist us in making changes, which is why we have been keen to roll-out smart meters and their benefits to all our customers. We fully appreciate that these changes in attitude and consumption patterns will take time, but also note that we have seen very significant changes in per capita consumption in recent times (due to the Covid pandemic and 'cost of living' crisis). As described in our plan we intend to maximise the impacts that we can achieve with our 'real time' smart meter data and customer engagement.		

2.46 RWE Generation UK

No.	Consultee	Feedback from consultee	Our response		
1	RWE Generation UK	RWE Generation UK noted their potential water requirement for water to meet net zero projects, and the importance of long term industrial water supplies for the Humber region.	We thank RWE Generation UK for their response and have included an assessment of their potential water needs for net zero in our revised draft WRMP24.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.47 Suffolk Wildlife Trust

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Suffolk Wildlife Trust	**Summary of response** Suffolk's rivers, streams, and other natural waterbodies are in a parlous state due to multiple impacts from the way we use land and manage terrestrial and freshwater environmental assets. In 2019, the Environment Agency found that fewer than 8% of surface waterbodies in the Anglian River Basin District achieved good ecological status.	We understand the concerns raised by the Suffolk Wildlife Trust on the current state of the rivers in the region. We aim that through the delivery of our plan (including the environmental destination) we will help to reduce the current ongoing impacts.	No	N/A
2	Suffolk Wildlife Trust	As the largest abstractor in the Water Resources East region, Anglian Water has an important role to play in leading the transition to sustainable water management that protects and restores the natural water environment. The recognition in the draft WRMP that there is a need to reverse the past deterioration in the condition of natural waterbodies and restore the water environment to good health is welcome and we support the need for significant reductions in current levels of groundwater abstraction for PWS.	We thank the Trust for its support.	No	N/A
3	Suffolk Wildlife Trust	For the WRMP to deliver for the environment and biodiversity as well as people it must be part of a broader suite of strategically coordinated plans, projects, policies, and regulatory frameworks needed to tackle the systemic challenges of restoring and enhancing the natural environmental and enabling the sustainable use of natural water resources. For example, the successful achievement of the WRMP's environmental objectives is inextricably tied to the ability of the Drainage Wastewater Management Plan to deliver the transformative investment needed to repair the harm being done to the water environment by the broken wastewater and surface water drainage system	We understand Suffolk Wildlife Trust's comment on approaching water resource management in a holisitic manner. Our environmental destination investigations will allow us to explore the multifaceted approaches to management, this will inform our WRMP29.	No	N/A
4	Suffolk Wildlife Trust	The recognition in the draft WRMP that there is a need to reverse the past deterioration in the condition of natural waterbodies and restore the water environment to good health is welcome and we support the need for significant reductions in current levels of groundwater abstraction for PWS.	The delivery of the environmental destination as well as the investigations into the environmental destination will allow us to explore strategic solutions to improve the condition of natural waterbodies and water environment.	No	N/A
5	Suffolk Wildlife Trust	The WRMP's chosen Environmental Destination (BAU+) though does not meet the level of ambition and urgency we believe is needed in the pursuit of achieving this goal and ensuring freshwater ecosystems are making a positive contribution to Government policy commitments to halt biodiversity declines by 2030.	We understand the concerns raised around the level of environmental destination ambition. The BAU+ scenario is still used within our revised draft as this scenario was agreed with the Environment Agency and is recommended within the WRPG. However, we are aware of the policy commitments and these will be fundamental to the environmental destination investigations beginning shortly.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
6	Suffolk Wildlife Trust	At the same time, we recognise that meeting predicted future demand while reducing abstractions can have its own environmental costs. We are especially concerned about the potential for significant adverse impacts on the environment from proposed desalination schemes including at Felixstowe, not only on National Site Network sites but on non-statutory County Wildlife Sites and priority habitats and species, and we support the RSPB's call for this option to be removed unless and until significant adverse effects on European Sites can be ruled out.	We understand the concerns raised by Suffolk Wildlife Trust, following the draft WRMP24 submission and consultation response, including this one, we have revisited the Habitats Regulations Assessment to ensure it has an appropriate strategic plan-level focus. Although Felixstowe Desalination is no longer selected within our plan, other desalination options are and this approach has been applied to the plan as a whole.	Yes	Revised draft WRMP24 HRA Sub-report
7	Suffolk Wildlife Trust	We support the WRMP's prioritisation of demand management options to reduce future supply-demand deficits but would like to see these options expanded and extended - for example by setting more ambitious targets for reducing per head water consumption - to maximise their proportionate contribution compared with more environmentally costly supply side options.	We welcome Suffolk Wildlife's Trust support for prioritisation of demand management, since the draft WRMP we have updated the demand management strategy for the revised draft.	Yes	Revised draft WRMP24 Demand management preferred plan technical support document
8	Suffolk Wildlife Trust	There is great potential for Nature-Based Solutions (NBS), Catchment Based Approaches (CaBA), and crosssectoral collaboration to significantly amplify the water quality improvements and ecological (and societal) benefits of abstraction reductions at the same time as helping to offset these reductions, for example by helping to recharge aquifers or providing storage reservoirs.	We welcome the consultation comments on nature-based solutions and catchment-based approaches, through our environmental destination investigation, these will be explored further. We would welcome engagement with the Wildlife Trust on this to gather local knowledge to feed into this work.	No	N/A
9	Suffolk Wildlife Trust	We support Anglian Water's 'Get River Positive' commitments and the need for further investigation at AMP8 of the potential for NBS and catchment wide approaches to contribute to the achievement of the WRMP and WINEP objectives.	We thank Suffolk Wildlife's Trust support for the 'Get River Positive' commitments, we will be welcoming engagement with the Trust throughout our environmental destination investigations to discuss potential nature-based solutions and catchment wide approaches.	No	N/A
10	Suffolk Wildlife Trust	We would welcome further engagement with Anglian Water and other stakeholders as part of this process.	We will be engaging with the Trust in the coming months when developing the scope for our environmental destination investigations.	No	N/A
11	Suffolk Wildlife Trust	**Recommendations** We recommend that AWS commit to exploring the potential to work towards the more ambitious 'enhance' Environmental Destination while avoiding the need for more environmentally costly supply side options like desalination.	We understand Suffolk Wildlife Trust's suggestion to use the enhance environmental destination scenario, BAU+ is still being used in revised draft WRMP24. This is due to this scenario being agreed with the EA and identified in the WRPG that this is the appropriate scenario to be used. As part of the environmental destination investigations, that will be commencing shortly, we hope to identify alternative strategic solutions to help in achieving the environmental destination. Further details on the WINEP AMP8 investigations have been included in the revised draft WRMP24.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
12	Suffolk Wildlife Trust	AWS needs to recognise the importance of County Wildlife Sites - especially those that comprise riverine and wetland habitats - both as receptors for environmental impacts of the different options identified in the WRMP and as important stepping stones in the wider ecological networks and building blocks of a future Nature Recovery Network.	Within our Revised Draft WRMP24 BNG and NCA sub-report, further information has been included for the BNG roadmap which highlights the importance of stepping stone for the future Nature Recovery Network.	Yes	Revised draft WRMP24 BNG and NCA Sub-report, Section 4
13	Suffolk Wildlife Trust	AWS need to expand and extend demand management options to maximise their proportionate contribution to offsetting future supply-demand deficits compared with more environmentally costly supply side options like desalination.	As part of our water resource strategy, we plan to build upon our proven track record of delivering demand management savings and our ambitious AMP7 programme, through leakage reduction, our ambitious strategy for smart metering and innovative water efficiency options. Our programme of demand management in AMP7, including the roll-out of over 1 million smart meters, will act as the foundation for our revised draft WRMP24 plan; one that provides economic benefits, delivers substantial water savings, and is also considered to be achievable. Our previous success, however, does mean that there is limited potential to achieve further savings through 'tried and tested' demand management activities (as demonstrated by our current meter penetration). Our ambition is to drive the next 'step-change' in demand management through technological innovation, enhanced communications and the implementation of 'industry leading' behavioural change initiatives. Savings from our full roll-out of smart meters by 2030, leakage reduction (to our lowest recorded levels), water efficiency options and non-household options, in combination with government led interventions are expected to more than compensate for regional increases in demand due to population growth throughout the WRMP24 plan period, leading to our lowest recorded levels for both leakage and per capita consumption. Full details of our plan are detailed in our revised draft WRMP24 Demand management preferred plan technical supporting document. Note that we anticipate demand reductions of over 200Ml/d by the end of the planning period (2050), which will more than offset demand growth, but do entail significant risk. We, consequently intend to place robust monitoring measures in place to ensure that we understand where demand management options are successful and how we might make them more effective.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document
14	Suffolk Wildlife Trust	There needs to be greater emphasis on the need to prioritise Nature-Based Solutions and catchment-wide approaches to restoring and enhancing the ecological condition of our rivers, streams, and wetland habitats, to make the best use of the water left in the environment by abstraction reductions.	We understand the need for prioritising more holistic approaches for water resource management. Within our environmental destination investigations we will be exploring these further.	Yes	Revised draft WRMP24 Sustainable abstraction and environment technical supporting document, Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
15	Suffolk Wildlife Trust	You should adopt the ambition to achieve a 20% net gain in biodiversity (BNG) for all new water supply and treatment infrastructure and for BNG to contribute to strategic nature recovery including species and habitat conservation priorities. This would help to ensure biodiversity net gain results in significant and meaningful ecological improvement and biodiversity uplift.	At a plan level we will be delivering the statutory 10% BNG and once at a project level, the appropriate BNG will be completed as recommended by the relevant Local Authority. More can be read about out BNG roadmap and opportunities with our WRMP in the Revised Draft WRMP24 BNG and NCA Sub-report.	Yes	Revised draft WRMP24 BNG and NCA Sub-report, Section 4
16	Suffolk Wildlife Trust	Intertidal habitats should be included in future BNG assessments, including project level assessments.	Within our BNG assessment, impacts to intertidal habitats have been reported where these impacts have been identified.	No	N/A
17	Suffolk Wildlife Trust	We recommend that the desalination plant option at Felixstowe is removed until such time as significant adverse effects on European Sites can be ruled out.	In our revised draft WRMP24 Best Value Plan, Felixstowe desalination is no longer being selected. However, other desalination plants are selected in our Best Value Plan. As we are currently at a strategic-plan level, our HRA approach has been updated to reflect this. In addition to this, we have an adaptive planning programme that is running in parallel to the WRMP24 process to allow us to further investigate the potential impacts from desalination to feed into the project-level HRA and WFD assessments when appropriate. We will be engaging at the appropriate time to ensure Suffolk Wildlife Trust are engaged in the process.	No	Revised draft WRMP24 Main report Revised draft WRMP24 HRA Sub-report
18	Suffolk Wildlife Trust	**Environmental destination** The BAU+ Environmental Destination selected in the WRMP is only marginally more ambitious than Business As-Usual and does not adequately reflect the level of ambition and urgency needed to repair the ecological damage that has been done to our waterbodies and wider water environment by unsustainable use, including unsustainable levels of abstraction for PWS. We urge Anglian Water to consider how abstraction reductions and water returned to the environment under the BAU+ Environmental Destination can be increased closer to the levels required by the Enhance Environmental Destination at the lowest cost to the environment and consumers, so that the objectives of the Enhance Environmental to increase protection and enhancement of SSSIs, chalk streams, and sensitive headwaters can be achieved. Making the best use of the water that reduced abstraction leaves in the environment to improve the ecological condition of waterbodies and wetland habitats, including through NBS and catchment-based approaches, is essential to achieving the best outcomes for the environment and best value for consumers and society from abstraction reductions. We note that the strategy for achieving the selected Environmental Destination has not yet created and will be informed by WINEP investigations in AMP8. We urge Anglian Water to leave the door open to developing and implementing alternative solutions and	We understand the concerns raised by Suffolk Wildlife Trust on the level of ambition for our environmental destination. Within our revised draft WRMP we have continued to use the BAU+ scenario as this has been agreed with the Environment Agency and it is recommended within WRPG. We would like to reassure the Trust that this will not limit us on potential alternative options that could be implemented within the plan period. Our environmental destination investigations will be investigating potential alternative strategic solutions, as well as improving the confidence within the environmental destination scenarios.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		options to those currently proposed in the draft WRMP if investigations show that these could enable the achievement of a more ambitious Environmental Destination and greater ecological benefits.			
19	Suffolk Wildlife Trust	**Environmental water needs** We support the comments made by the RSPB in their response to this consultation on the need for better evidence to inform our understanding of water requirements and pressures on different environmental receptors, and how these are likely to be affected by the different options proposed in the WRMP. In addition to the issues identified by the RSPB in their response, we wish to highlight some further specific examples of sensitive environmental receptors and interactions with the proposals and options in the WRMP that need further consideration.	We welcome the feedback from Suffolk Wildlife Trust on specific examples of sensitive environmental receptors and interactions with options selected within our WRMP. As we are at a strategic plan-level, our environmental assessments reflect this. As options are progressed individually at a project level, this detail will be fundamental in refining design and further environmental assessments.	No	N/A
20	Suffolk Wildlife Trust	**Fen habitats** The condition of many of Suffolk's fen wetlands has been suffering because of a combination of lack of water leading to drying out of these habitats together with nutrient enrichment of the riverine element of the water feeding these wetlands. Increasing flows in rivers feeding fen habitats without addressing the level of nutrients in these waterbodies has the potential to exacerbate the deterioration in the condition of these sensitive ecosystems. The complex interactions between groundwater and surface water (riverine) sources feeding fenlands must be carefully considered to understand the likely ecological effects of any options that would alter the balance between ground and surface water inputs to these habitats, which include European and National designated sites, such as the Waveney and Little Ouse Valley Fens Special Area of Conservation (SAC).	As part of the AMP8 Environmental Destination Investigations, water quality modelling will be completed which should aid us in understanding the potential ecological effects from water quality changes due to changes in flow. As we develop our scope for this, it would be useful to gather local knowledge from the Wildlife Trust to ensure efficiencies in the modelling.	Yes	Revised draft WRMP24 Sustainable abstraction and environment technical supporting document, Section 7
21	Suffolk Wildlife Trust	**Intertidal saltmarsh** Saltmarsh is sensitive to nutrient loads in the water that periodically inundates these important intertidal habitats. Nitrogen-enriched conditions have been found to negatively affect below ground plant growth, which is critical for the physical stability of saltmarsh habitats. Like the fenland example above, the interactions between riverine and (in this case) seawater sources and nutrient enrichment effects on saltmarsh condition and stability are complex, but any increase in nutrient-enriched riverine water reaching sensitive saltmarsh habitats in Suffolk's Internationally Important estuaries has the potential to do significant damage to these already fragile systems, affecting not only biodiversity but carbon sequestration and	We understand your concerns over the condition and stability of saltmarshes due to the interactions between fresh water and seawater sources. At the appropriate time, options will undergo a project-level HRA (compared to the current plan-level HRA), at that point, further investigation into the potential adverse effects on estuarine saltmarsh habitats would be completed.	No	N/A

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		storage. Additional effort is needed to assess and mitigate any potential adverse effects from the implementation of the WMRP on estuarine saltmarsh habitats.			
22	Suffolk Wildlife Trust	**Maximising the environmental benefits of abstraction reductions** Reducing abstraction impact on flows is just one of the measures (albeit an important one) needed to help restore the ecological condition and biodiversity of our waterways and wetlands. The projects and cross sector initiatives identified in AMP7 and AMP8 to restore and enhance the water environment will be vital to ensuring the water we leave in the environment by reducing abstractions for PWS is put to the best possible use to support ecological recovery. NBS should be central to plans and working with landowners and other stakeholders to improve land and water management and restore ecological function to our rivers and streams, for example by reconnecting them to their floodplains, must be a priority.	We agree with Suffolk Wildlife Trust's feedback of ensuring that the water left in the environment, due to reducing abstractions, is used in the best possible way to support ecological recovery. Our environmental destination investigations will explore the potential for nature-based solutions to support with this. We would welcome engagement with the Trust throughout the process to gather local knowledge.	No	N/A
23	Suffolk Wildlife Trust	There needs to be much clearer proposals for how water not abstracted will be used most effectively to improve habitats, with more emphasis on reconnecting floodplains and restoring wetlands, slowing the flow by planting the right trees in the right places in catchments, and supporting cross sector initiatives to improve the condition of rivers and water environment.	Within our environmental destination investigations we are aiming to further understand the most effective way for the environment to respond to the water being returned. We hope to engage with the Suffolk Wildlife Trust in the coming months to gather thoughts on the environmental destination investigations.	No	N/A
24	Suffolk Wildlife Trust	Customers' support for the Environment supports the case for Anglian Water to explore ways to enhance the ecological benefits and positive impact on ecological condition of leaving water in the environment. E.g. remeandering rivers and streams, reconnecting floodplains, reducing agricultural inputs in sensitive locations, and restoring wetland habitats.	Within our environmental destination investigations we will explore ways to enhance the ecological benefits of leaving more water within the environment.	No	N/A
25	Suffolk Wildlife Trust	Cost-benefit-analysis of different NBS options for enhancing the ecological benefits of leaving water in the environment should form part of the further investigation due to take place in AMP8.	A fundamental part of the AMP8 Environmental Destination Investigations will be a cost benefit analysis of leaving water in the environment. Working closely with regulators and stakeholders will allow us to explore the multi-sector aspect of this analysis.	No	N/A
26	Suffolk Wildlife Trust	**Felixstowe desalination** We share the RSPB's concerns about the potential for significant adverse impacts from the Felixstowe desalination option on adjacent European sites, which is identified in the HRA. Further to this, there is the potential for impacts on coastal and riverine County Wildlife Sites, which have not been considered anywhere in the environmental assessments supporting the WRMP, but which represent sites of county level importance for wildlife	In our revised draft WRMP24 Best Value Plan, Felixstowe desalination is no longer being selected. However, other desalination plants are selected in our Best Value Plan. As we are currently at a strategic-plan level, our HRA approach has been updated to reflect this. In addition to this, we have an adaptive planning programme that is running in parallel to the WRMP24 process to allow us to further investigate the potential impacts from desalination to feed into the project-level HRA and WFD assessments when appropriate. We will be engaging at the appropriate time to ensure Suffolk Wildlife Trust are engaged in the process.	No	Revised draft WRMP24 HRA Sub-report

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		and biodiversity. We recommend that the desalination plant option at Felixstowe is removed until such time as significant adverse effects on European Sites can be ruled out.			
27	Suffolk Wildlife Trust	While we support the need to work towards the more ambitious 'Enhance' Environmental Destination, we believe this should be done while minimising the need to resort to supply side options that themselves will have significant adverse environmental impacts, including on ecology and biodiversity. We believe there should be a greater emphasis in the WRMP and WINEP on exploring and developing alternative demand and supply side options to reduce the need to rely on desalination to make up any future supply-demand deficits.	Our best value plan has been designed to enable us to adapt our Environmental Destination strategy following the outcome of the WINEP scientific investigations in AMP8, which will inform the location and scale of the need. The investigations will also include pilot catchments to understand different catchment approaches and allow us to explore nature-based solutions. We will engage with the Wildlife Trust as we develop the scope of these investigations and how we can best explore alternative solutions through this work. The investigations will inform WRMP29 therefore there will be an opportunity to identify any potential alternative schemes to the desalination options currently included in the best value plan.	No	N/A
28	Suffolk Wildlife Trust	**Net zero** We support the commitment to achieve net zero operational carbon emissions by 2030 and note the potential for NBS to help offset any residual emissions that cannot be eliminated at source - for example restoration and enhancement of condition of carbon sequestering habitats such as saltmarsh.	We welcome your support on achieving net zero operational carbon emissions by 2030 and we will be exploring further into nature-based solutions in the coming years.	No	N/A
29	Suffolk Wildlife Trust	**Biodiversity net gain** We note that initial assessments of the unmitigated BNG Metric outputs for the Best Value Plan (BVP) suggests a 7.95% net gain in biodiversity would be achieved across all options combined. Some individual options though, such as desalination options - result in significant net losses for biodiversity - with most predicted gains made from reservoir options. Due to differences in the timing of delivery, locations, and habitats affected by the different options, it may not be appropriate for the biodiversity losses resulting from some options to be offset by gains made by others, and we suggest that BNG should be achieved for each option at a project level.	Thank you for your comment. In our revised draft WRMP24 BNG and NCA Sub-report, we have clarified that every option will be delivering the statutory requirements (10% BNG) where planning permission is required. It should be noted as well that our overall BNG for the plan will deliver 10% BNG.	Yes	Revised draft WRMP24 BNG and NCA Sub-report, Section 4
30	Suffolk Wildlife Trust	We do however support strategic approaches to delivering BNG that could contribute to landscape scale nature habitat creation and/or enhancement for priority species and habitats as part of the Local Nature Recovery Strategy and would welcome discussion with Anglian Water and other stakeholders about how this could best be achieved for the options implemented through the WRMP.	Since the draft submission, further detail has been included on the potential BNG roadmap for our plan. Once at a project level we would welcome engagement with Suffolk Wildlife Trust on how best to achieve this.	Yes	Revised draft WRMP24 BNG and NCA Sub-report, Section 4

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
31	Suffolk Wildlife Trust	**Case study: Waveney and Little Ouse Headwaters (WaLORS) Landscape Recovery project** The Waveney and Little Ouse Headwaters (WaLOR) Landscape Recovery project is a pilot landscape scale nature recovery scheme with improving water quality and sustainable water management at its heart. Working with landowners and other stakeholders the project is taking a catchment level approach to delivering nature-based land management that accommodates farming and other uses such as public access, while restoring and managing flows, reducing sediment and nutrient loss and run-off, and improving the chemical and ecological condition of the River Waveney, River Little Ouse, and their tributaries. We would welcome further discussion with Anglian Water about the potential for this project and others like it to help deliver on the objectives of the WRMP and wider sustainable management, protection, and restoration of the water environment.	We would be interested in understanding further information on the Waveney and Little Ouse Headwaters (WaLOR) Landscape Recovery Project, we will be in contact to set up a meeting to discuss.	No	N/A

2.48 UK Water Retailer Council

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	UK Water Retailer Council	**Context** At market opening, it was anticipated that competition between retailers would drive the provision of water efficiency support to NHH customers. This hasn't been the case. It is apparent that since market opening, there are neither sufficient incentives on customers to drive behaviour change and demand for water efficiency support from their retailers, nor are there sufficient incentives on retailers and wholesalers to provide it in the absence of customer demand. And even if there was demand, the lack of granularity of consumption data makes it difficult for NHH customers to assess potential benefits of water efficiency interventions or measure the benefit of any such intervention. To achieve the environmental target of 9% (245 Ml/d) by 2038 will require a step change in data quality and availability in the market and potential changes to the regulatory framework. Currently, some NHH properties are still not metered and, according to information from MOSL, most (around 75%) NHH properties are fitted with legacy, i.e. 'dumb' meters. In addition there are around 179,000 'long-unread' meters, including almost 24,000 dating from pre-market opening. In total therefore almost 14% of the NHH meters have not had a meter reading entered onto CMOS for 12 months or more. Without the funding to overcome this significant data quality and availability impediment the ability to progress water efficiency and demand reduction in the NHH market will be constrained. The 2024 Water Resource Management Plans and PR24 business Plans, together, present the opportunity to address this legacy issue holding back the market and resulting in the major cause of customer complaints We note and support Ofwat's inclusion in its PR24 Final Methodology that 'In their WRMPs and business plans we expect companies to consider smart meter solutions as the standard meter installation type. For English companies this is in accordance with the UK government expectations for water resources planning.'	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50 (approximately 10Ml/d per 5 year AMP period). We would agree that the lack of data has been a barrier to the implementation of water efficiency measures for this sector. As described in our plan, 99.5% of non-household customers within our region currently have either a visual read meter or or a logger, but this has not been sufficient to help drive water efficiency measures. We are, therefore currently in the process of rolling out smart meters to all of our customers and to all non-household properties, by 2030. In order to leverage the data this will facilitate, we have been liaising with Retailers to develop options to assist businesses with water efficiency (smart meter led water efficiency visits) and to incentivise customer-side leakage reduction. We welcome support for these measures and will look forward to further dialogue regarding the best way to enable water efficiency for the non-household sector.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9. Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
2	UK Water Retailer Council	**Specific comments on the company's WRMP** Despite Ofwat's Final Methodology Statement and Defra's guidance to take account of the NHH Market to achieve significant demand savings, water companies' (i.e. wholesalers') responses are at best mixed. We are pleased therefore that Anglian Water proposes to continue its leading role pursuing their smart metering programmes from WRMP19 into WRMP24 for both HH and, we are assuming, NHH customers.	Our current intent is to install 1.1 million AMI smart meters by 2025 as part of our WRMP19 AMP7 plan. This will account for approximately 50% of our current customer base. In parallel we intend to install AMI smart meters for non-household businesses. We currently have over 600K smart meters installed, with >16K non-household customers with smart meters (as of July 2023). We intend to complete our roll-out of 2 million smart meters by 2030 for both our household and non-household customers (excluding those NHH with loggers already installed). The roll-out has been targeted to areas of particular water stress. We intend to leverage the data resulting from the smart meter roll-out to drive water efficiency for both households and non-households impacting water consumption, behavioural change and customer-side leakage.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 3
3	UK Water Retailer Council	**Smart metering** We note and welcome the company's Plan to continue its ambitious AMP7 smart meter installation programme with 1.1 million due to be installed by 2025 and the maximum feasible penetration achieved by 2030. We believe the benefits have already been set out supporting the case for smart(er) metering and these are reflected in your Plan. However, we have to assume from your commentary on smart metering being 'pivotal' to your WRMP24 strategy and comments on water efficiency and the visibility of data to customers, that non-household customers are fully included in this programme. It would be helpful to confirm this in the company's final WRMP. Smart metering is also fundamental in supporting the Water Retail Market, addressing many of the current legacy data quality and availability issues. However we understand your central imperative for the smart meter rollout is giving information to customers so that they, and you, can understand their consumption and encourage water efficiency savings. Clearly this applies equally to non-household customers and to their Retailers, who can, with the availability of data, support Anglian Water and NHH customers understand their water use.	We can confirm that we are currently installing smart meters for non-household customer in parallel with our full household customer roll-out. These meters are being installed area by area as we build the network required to remotely collect the smart meter data. As described, we consider that the information that smart meters can deliver will be pivotal in driving water efficiency and identifying leakage, for both the household and business sector. We are working closely with our Retail partners to develop demand management options and engage with businesses to conserve water and reduce demand.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
4	UK Water Retailer Council	**Water efficiency** We note that non-household consumption accounts for approximately 26% of Anglian Water's overall demand, but the Plan does not yet attribute any savings from the non-household sector. However we welcome your approach to working with Retailers and others to better understand NHH consumption in more detail and identify opportunities for savings and quantify these for the final draft. Clearly though there is an expectation from Government that there will be an overall reduction in NHH demand of 9% by 2038. Your current thinking identifies a number of options to take forward: 1) reducing leakage through identification of continuous night flow - as per household customers 2) business customer 'self-audits' to identify leaks, followed up by incentivised or a 'find and fix' service 3) developing a web based 'self-audit' system, allowing comparison and benchmarking of consumption with potential for follow-up virtual support visits 4) for larger NHH users the need to understand the different behaviours and usage patterns and the requirement for more complex interventions, such as encouraging water recycling technologies Whilst Retailers would support all these options to inform NHH customers and reduce demand, it is Retailers who have the direct relationship with the NHH customer. We note and welcome therefore your current engagement with Retailers in this space. Retailer will look forward to continuing this engagement with Anglian Water during the options development phase and the subsequent implementation of selected measures.	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50 (approximately 10Ml/d per 5 year AMP period). Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners. In total, these options help us achieve approximately 8% reductions by 2037/28 and 15% by 2049/50, but these reductions can only be achieved relative to the non-household demand position (including growth). We do not, therefore, believe that, achieving the absolute levels of non-household demand reduction, from the 2019/20 base-line, should be included in the revised WRMP24 plan, as this represents a degree of uncertainty with respect to the implementation of the newly developed options, which would not be prudent. As we prepare for WRMP24, we will trial options and their implementation, and develop options further for our WRMP29 plan, as we gain more experience. On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). Note this demand is not included in our potable water output or DI and, therefore, is considered an export and not part of our current non-household demand target assessment.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9. Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
5	UK Water Retailer Council	You also suggest the option to explore tariffs to encourage the sensible use of water during periods of high demand. There may though also be the opportunity of utilising tariffs to influence NHH demand during periods of normal demand.	As we prepare for AMP8 and the WRMP24 programme, we will implement our initial tariff trial from April 2024. We have, therefore worked with the Centre for Competition Policy (CCP) at the University of East Anglia (UEA) to develop a robust methodology and provide guidance on trial design and data analysis, aligned to Ofwat's principles. We are planning to start a trial of a seasonal tariff from 2024/25 (in preparation for AMP8). The tariff will consist of a higher volumetric charge in the summer months and a lower volumetric charge for the remainder of the year. We plan to test variations in price differentials across seasons and different communication strategies across several customer cohorts. We will investigate how tariffs might also be used to influence non-household demand and how we might reform the current decreasing block tariff system.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 10 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 7
6	UK Water Retailer Council	**Looking ahead to final WRMPs** You should, when referring to customers, define whether they are household or non-household	We have specifically modelled household and non-household customers by cohort and segment as part of our revised draft WRMP24. All influences and cohorts have been described in detail in our three reports.	Yes	Revised draft WRMP24 Demand forecast technical supporting document Revised draft Demand management preferred plan technical supporting document Revised draft Demand management option appraisal technical supporting document
7	UK Water Retailer Council	Confirm that NHH customers will be included in the company's rollout of smarter meter installation programmes and the delivery of water efficiency advice and measures. In both cases companies should set out their plans and how they propose to engage and collaborate with retailers and NHH customers.	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50 (approximately 10Ml/d per 5 year AMP period). Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast).	Yes	Revised draft WRMP24 Demand forecast technical supporting document Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Demand management option appraisal technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners. In total, these options help us achieve approximately 8% reductions by 2037/28 and 15% by 2049/50, but these reductions can only be achieved relative to the non-household demand position (including growth). We do not, therefore, believe that, achieving the absolute levels of non-household demand reduction, from the 2019/20 base-line, should be included in the revised WRMP24 plan, as this represents a degree of uncertainty with respect to the implementation of the newly developed options, which would not be prudent. As we prepare for WRMP24, we will trial options and their implementation, and develop options further for our WRMP29 plan, as we gain more experience. On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). Note this demand is not included in our potable water output or DI and, therefore, is considered an export and not part of our current non-household demand target assessment.		
8	UK Water Retailer Council	Confirm the number of smart(er) meters they intend to rollout during AMP8, broken down by HH - NHH and by AMR - AMI.	We are currently progressing our roll-out of smart meters for both our household and non-household customers and will achieve full smart meter roll-out by 2029/30 (2 million meters). Note that we currently have over 500K household smart meters and 16K non-household smart meters already installed (2022/23), as we progress our geographic roll-out. Also note that 99.5% of non-household customers are metered. We expect that by 2025 approximately 60K non-household properties will be smart metered or have loggers installed and by 2030 this will be increased to 138K. Our preferred technology for smart meters is AMI, so all meters will be AMI by 2030. This technology facilitates hourly data reads.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 6 and 9
9	UK Water Retailer Council	Demonstrate how they have taken account of evidence from the existing research work on smart(er) metering already in the Market, commissioned by MOSL, and the trials already carried out by other water companies.	As part of our demand management option appraisal process, we have worked with our consultants to gather supporting evidence with regard to the key assumptions supporting our cost/benefit analysis processes. This has included internal analysis of Anglian Water data as well as a full literature review of available research. These assumptions are detailed in our 'Demand management option appraisal technical supporting document'	Yes	Revised draft WRMP"4 Demand management option appraisal technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			report and our Consultant Supporting CBA report. We are keen to reference all information relevant to the development of demand management options as well as sharing findings from our own research.		

2.49 Uniper

No.	Consultee	Feedback from consultee	Our response		
1	Uniper	Uniper noted their potential water requirement for water to meet net zero projects, and the importance of long term industrial water supplies for the Humber region.	We thank Uniper for their response and have included an assessment of their potential water needs for net zero in our revised draft WRMP24.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.50 VPI Immingham LLP

No.	Consultee	Feedback from consultee	Our response		
1	VPI Immingham LLP	VPI Immingham LLP noted their potential water requirement for water in order to meet net zero projects, and the importance of long term industrial water supplies for the Humber region.	We thank VPI Immingham LLP for their response and have included an assessment of their potential water needs for net zero in our revised draft WRMP24.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7

2.51 Waterlevel

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Waterlevel	Waterlevel is now preparing to submit our proposal for consideration under the Bid Assessment Framework. The proposal is to deliver up to 45 Ml/d (that could be raised to 180Ml/d directly or shared with others) to Anglian Water at several sites such as Colchester STW/Ardleigh, Alton Water and Immingham. The water could be used both as a water resource option and if necessary, as a “more before 4” option in the event of an extreme (1-in-200 to 1-in-500 year) drought occurrence. In particular, we understand that additional supplies to Ardleigh or Alton Water would help with immediate supply/demand deficits in this area. Additional supplies to Immingham would boost the available resources that could be transferred south via the proposed Grimsby pipeline link and increase the reliability of the growing demand for non-domestic use in the area. We would however propose that any of the preferred options being considered by Anglian would not be seen as mutually exclusive of EDRS’s proposed option, as it can “buy time” in providing resilience prior to the preferred option being adopted, built and commissioned. This approach could result in the options modelling selecting a combination of both, after confirming that EDRS scheme will: -Have a significantly lower capital cost than the Colchester to Ardleigh reuse scheme. There is not expected to be any capital cost at the Norwegian end of the supply chain, rather a cost for reserving capacity and remaining on Stand-by to deliver on-demand. -Have a similar fixed operating cost. -Be available well ahead of 2031. Supplies from Norway could be in a position to commence by late 2023 and ramp up in 2024 on demand. -Be a reliable resource with no susceptibility to climate change or extreme (1-in-500) droughts. -Requires no new or varied abstraction licence and discharge consents.	We thank Waterlevel for its proposal, and will respond through the Bid Assessment Framework.	No	N/A

2.52 Waterscan

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Waterscan	**Broad support** On the whole, Waterscan supports the efforts made by Wholesalers to meet the supply and demand challenges facing the water industry in the coming decades, even though we believe there is much room for improvement. We support carefully managed investment into improving drought resilience, reducing leakage, and reducing per capita consumption.	We appreciate Waterscan's support for our plans and will continue to collaborate on the development of our demand management strategy. The issues faced in the Anglian Water region are significant, but we are planning an ambitious program in order meet these challenges. We will look forward to working with Waterscan on our future plans.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document
2	Waterscan	**Pushing for greater ambition: targets** We expect Wholesalers to provide a clear, compelling roadmap to meet every target in their WRMP as the current goals are unhelpfully vague. The same applies to the industry-wide commitment to reach net zero operational carbon emissions by 2030. We recognise the temptation to fall back on national targets set by Defra (for example to reduce per capita water consumption by 9% by 2038) as this allows water companies to request funding through PR24 to meet these targets directly. However, it is essential that Wholesalers move more quickly and go further than Government-set targets. This is especially important considering that per capita consumption excludes non-household (NHH) consumption, undermining the incentives and funding available for improving NHH water efficiency. We are concerned about the setting of national targets and the tendency for water companies to default to these targets. There is a troubling lack of transparency over how these national targets were chosen and whether they are suitable or ambitious enough for particular catchments, water resource zones (WRZs), and/or water companies. Given the risks that national targets have been watered down and do not push Wholesalers far enough, there needs to be greater clarity and justification around why goals and deadlines have been chosen. This is particularly relevant when percentage decreases still leave excessive leakage rates due to high starting points. For instance, roughly 24% of Thames Water's supply is currently lost to leakage, but halving this to 12% is still not nearly acceptable. We do not believe that the current targets are challenging enough. Maintaining shockingly high leakage rates disables customer motivation to change behaviours and sends the de facto message that high leakage is both acceptable and the norm.	Whilst developing our revised draft WRMP24, we have considered all relevant targets and commitments that have been included within the regulatory framework. These targets have informed the envelope within which future forecast demand should be viewed and the ambitions that should be embodied in our demand management strategy. However, whilst developing our preferred plan, it must be understood that forecast projections are based upon current experience and analytical outputs, such that planning outcomes are rigorously based upon and reflect real demand data. Forecasts and out-come metrics have, consequently, been grounded upon: - the current position of Anglian Water with regard to key metrics; demand, PCC and leakage. - known measurements and actual out-turns (i.e. base-line data and current demand management option saving assessments). - agreed assumptions regarding future demand management option delivery and customer behaviours, based upon internal expert assessment and external peer reviewed research. - regionally agreed views regarding future growth (and demographic change). Thus, whilst we have been mindful that our revised draft WRMP24 plan should aim to achieve (or closely match) governmental targets, our planned outcomes have been based upon our current position with respect to key metrics and complex modelling analysis of future demand management impacts.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 13

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3	Waterscan	**Pushing for greater ambition: environmental action** We support interconnected action to tackle climate change, for examples through net carbon neutrality goals and taking better care of local ecologies like sensitive chalk environments. Anglian Water is so far the only water company to voluntarily cap abstraction licences by 2025, which will reduce their abstraction licences by 85%. We urge other Wholesalers to follow Anglian Water's example to strengthen environmental protections and to go beyond mandated targets. A recurring theme across the draft WRMPs is operational net zero carbon emissions targets, with deadlines beginning from 2027 for Essex and Suffolk Water and Northumbrian Water. We encourage water companies to measure, disclose, and work to reduce their carbon emissions - as well as their water footprint - through the Carbon Disclosure Project (CDP). We are also keen for Wholesalers to consider and share their position on water neutrality.	We thank Waterscan for its comments. Anglian Water has committed to be operationally net zero by 2030 and we measure and disclose our carbon emissions in our Annual Report. There are different definitions of water neutrality, one of which relates to accommodating growth within existing abstraction volumes, which we have achieved at a regional level since privatisation through leakage reduction, metering and water efficiency.	No	Annual Integrated Report, 2023
4	Waterscan	**Pushing for greater ambition: pre-emptive work** Wholesalers need to take anticipatory action before the final WRMPs are published in 2024. For Wholesalers who do not forecast a water deficit before 2040 (like Yorkshire Water, Essex and Suffolk Water, and Northumbrian Water), there needs to be greater emphasis placed on innovation to channel investment into preventive measures and scoping projects that the industry as a whole would benefit from. Such trials could include water neutral partnership work and developing final effluent reuse possibilities.	As part of our preferred plan we have included our 'Demand Reduction Discovery Fund', in order to further our understanding of customer behaviours and the potential for future water efficiency initiatives. This programme will be used to identify and fill evidence gaps, regarding water demand, customer behaviours and water efficiency programs. It will help inform future forecasting for our WRMP, WRE and PR submissions along with our Long-Term Delivery Strategy (LTDS). The additional knowledge generated will be key in facilitating our ambitions with respect to demand reductions, feeding into our adaptive planning processes. Demand reduction will be crucial for the sustainability and resilience of the water supplies in the East of England, whilst maintaining Anglian Water at the forefront of water efficiency in the sector. It is envisaged that the fund will support research into the long-term effectiveness of demand management interventions. It will enable rigorously designed trials into the effectiveness of different types of metering, technological and behavioural change interventions over a five-year period. It will enable on-going monitoring of our 'Enabling Water Smart Communities' project, answering important questions about how we might encourage new developments to adopt an integrated water management approach and incorporate measures like localised water re-use (evidencing how these will be used by communities to reduce demand). Continuous monitoring and evaluation of this innovation project should provide valuable evidence to support future local plan policies, as well as demand options for future WRMPs.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			Our intention is that the programme should also be used to evaluate water efficiency measures that we wish to implement with our Retail colleagues, for the non-household sector. These measures will include; - the provision of detailed consumption data, - the incentivisation of water efficiency through audit, advice and the potential for device replacement, - leakage reduction in the non-household sector We will also investigate the potential for water re-use options. These options will all need trials and evaluation, before full implementation. Water neutrality is both a risk and an opportunity which is quickly approaching our region. This programme will be used to help ensure that the region is better prepared for the potential impact of water neutrality on growth. It will be used to develop our understanding, and expand our evidence base of multiple aspects of water efficiency, re-use and offsetting, which feed into water neutrality. We will look forward to liaising with key stakeholders on these projects.		
5	Waterscan	**Missing pieces: pollution events** Controversial pollution and sewage discharge events must be reduced to as close to zero as possible. We expect pollution events to be a much more explicit focus in the final WRMPs. Failing to adequately acknowledge these events and to provide a transparent, transformative roadmap for how such incidents will be systematically prevented are blatant shortcomings in the current WRMPs. Pollution events affect the availability of water, the health of society, and the ecological status of river catchments. They also cultivate public distrust and cynicism in the water market, sentiments which are incompatible with positively changing consumer behaviour. The toxic consequences of pollution events lead Waterscan to demand that water companies lead a major cultural shift in the water market. The carelessness of Wholesalers dramatically undermines the credibility, integrity, and potential of any efforts to reduce water demand and wastage or to better protect the environment and this must change.	Whilst we understand the concern about pollution events, the WRMP is a statutory document focussed on ensuring long term water supplies. Pollution and sewerage management is covered in other plans including our Drainage and Wastewater Management Plan (DWMP).	No	https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-wastewater-management-plan/
6	Waterscan	**Missing pieces: partnership work** While we support the consistent emphasis placed on partnership work, there was an overall lack of clarity and specificity over how such partnerships would be set up, run, and assessed. There is significant scope for more intensive, targeted partnership work under the umbrella of nature-based solutions, but it was not made clear how Wholesalers plan to engage with different stakeholders and under what terms. Wholesalers also need to play a greater role in researching the key challenges facing	As part of the revised draft WRMP24 demand management option development process, and in conjunction with our WRE partners, we have engaged with our regional Retailers and business customers, in order to gauge opinion on further water efficiency measures for the business sector. This recent engagement (in association with WRE and 'Blue Marble') has been conducted to understand the retailer perspective regarding the promotion of water efficiency; to develop and refine propositions and understand and overcome barriers; to explore these propositions and how	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

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		the water industry by working with collectives like the National Leak Research Centre (run by Northumbrian Water), the Water Research Institute at the University of Cardiff, and the Environmental Change Institute at Oxford University.	they might be implemented with retailers and non-household customers. Based upon this we have developed a number of options that we wish to implement in co-ordination with our Retail partners. These options have been considered in partnership with other wholesalers in the WRE region. We fully understand that Retailers are best placed to delivery these options, but also realise, that as the wholesaler, we are in a position to design option and gain funding through the WRMP enhancement program.		
7	Waterscan	**Missing pieces: working with retailers** Wholesalers have an untapped resource in Retailers to drive down NHH water usage. We believe Wholesalers need to develop a mechanism that empowers Retailers to offer this service to NHH customers. This would allow Wholesalers to focus on deliverables that cannot be achieved by third parties like leakage reduction, net zero, meeting household (HH) targets, and reducing pollution incidents.	We are still at an early stage of development with regard to partnering with Retailers in order to implement demand management options. However, we are currently progressing initial trials with Retailers, as to how we might incentivise and share funding to drive water efficiency programs in preparation for AMP8 roll-out. As we assess the success of these initiatives, we will be in a better position to define the framework in which they can be fully implemented. We will continue to liaise closely with respect to this, so that we can all assist in achieving the Government's targets.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9
8	Waterscan	**Missing pieces: impacts on other stakeholders** There is a serious lack of consideration in the draft WRMPs over how the Plans will affect other stakeholders, particularly NHH customers. There is a lack of transparency and clarity around the impact Wholesaler decisions will have on business customers. It is not acceptable to pass problems onto customers. While Wholesalers have a statutory requirement to protect domestic water supplies over NHH properties, this legal caveat should not translate into normal operating practice. This is particularly the case when NHH customers are proactive in managing and reducing their water use. These supply issues are happening now, yet are not analysed in the draft WRMPs. Given these issues, we require all Wholesalers to more carefully consider the cascading impacts of their Plans on other stakeholders like NHH customers.	Whilst developing our demand forecast we have utilised current local authority planning information to derive future projections, based upon population growth, employment and GVA forecasts. These have been applied to sector by sector regression based forecasts developed from data collected over the last 20 years. Understanding that we are currently experiencing significant growth we have uplifted local authority projections by using one of our highest forecasts for non-household growth, based upon our 'OxCam_2b_r_P' growth forecast (note that our core population/property forecast is based upon OxCam1b_r_P). This forecast includes an assessment of growth related to the potential Oxford-Cambridge growth corridor. Using this forecast scenario, 'OxCam2b_r_P', means that we have included an additional 33Ml/d of non-household demand over the WRMP24 planning period. Where necessary we have also included site specific volumes for businesses that we know require demand in the near term. Additionally we have derived an assessment for potential demand due to Hydrogen and carbon capture projects in our region (noting that these will be non-potable demand), based upon industry feedback from relevant partners. We are seeing significant near-term volatility with respect to non-household demand with requests for large volumes by specific sites. This is causing increasing pressure on our ability to deliver these requests within the current government target framework, for reductions in non-household demand, reductions in DI per person and reductions in levels of permitted	Yes	Revised draft Demand management preferred plan technical supporting document, Sections 9 and 13

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			abstraction. We have, consequently, used scenario testing to develop adaptive alternatives to the proposed plan, with defined trigger points in the near term, for adaptive plan development. Significant uncertainty surrounds potential near term non-household growth and we will consequently, continue to liaise with all relevant parties, to facilitate this growth, whilst also progressing our water efficiency strategy. However, we are also mindful that EA/Defra expect non-household demand to be reduce by 9% by 2038 and 15% by 2050. These targets are proving to be very challenging to achieve, using our modelling assumptions and growth. We will continue to work with Retailers and Non-household customers as we develop, implement and validate our non-household water efficiency strategy. We are very aware of the constraints that we are currently experiencing with regard to non-household demand growth, the EA/Defra targets for non-household demand reduction and abstraction licence reform limiting supply. We are, however, keen to work with strategic partners to navigate these issues and develop innovative solutions, whilst working within our statutory framework.		
9	Waterscan	**Missing pieces: smart metering: plans, data, and messaging** There is some interesting work planned for smart meter networks from Wholesalers like SES. However, considering that smart metering has now been established as the default position in PR24 (Ofwat are expecting 'full' smart meter penetration by 2035-2045), smart meter extension plans no longer seem so impressive. Moreover, the smart metering plans are often presented as broad commitments without providing the substantial detail that is required to inspire confidence in these plans. Importantly, we need more detail on the kinds of smart meter data that will be available, in what form, from what date, to who, and how - and at what cost - this data will be shared. There is a significant lack of clarity in the messaging around what the smart meter data is expected to achieve. For example, despite the rollout of new meters and water efficiency campaigns, water consumption in the Portsmouth Water area has increased in recent years. This raises questions about the power (or lack thereof) of smart meters to produce long-term behavioural change, meaning that this technology alone should not be relied upon or considered a magic bullet to reduce water consumption. Taking these challenges into account, any smart meter investment should be focused on where there is both opportunity and the	The smart meter technological revolution is now progressing across the Anglian Water region, as we install 1.1 million smart meters by 2024/25 (over AMP7). We currently have installed over 500K smart meters (2022/23). Under our preferred smart metering option for the revised draft WRMP24, we intend to complete our installation of smart meters across our region by 2029/30 (a 10 year roll-out), reaching the limit of feasible meter penetration (94.8%) by 2049/50. We have also readjusted our installation profiles to account for the AID program (Accelerated Infrastructure Delivery); installing an additional 60K smart meters in AMP7. Smart metering is fundamental in supporting our water efficiency and behavioural change activities, through the provision of real time consumption data for both our customers and ourselves. We intend to build on our current progress in developing our water efficiency communications strategy, as part of revised draft WRMP24. Data is being provided on a daily basis to customers through a dedicated website and 'customer portal' and we intend to develop these communication channels further over the WRMP24 planning period. The central imperative, which drives our 'smart meter' roll-out, is the provision of information for our customers, so that they can understand their consumption and so that we can help encourage behavioural change.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 13

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		need for water reduction. We recommend water companies target the middle sector of the NHH market where a balance between opportunity and customer engagement to reduce water use.	Changing attitudes and behaviours will reinforce current water savings, as customers become metered and measured and unlock the potential for additional water efficiency measures, in a mutually reinforcing way. Smart metering is also enabling significant benefits for leakage reduction through the more efficient and timely identification of both 'plumbing loss' and customer supply side leaks. The identification of leakage will inform our home visits, adding significant value to our water efficiency activities. Consequently, the systems that we are investing in are robust and, critically, are able to supply accurate and reliable data collection over the long term. This requirement has been foremost in our thinking regarding our original smart meter trials and in the selection of the current system being installed across the region. As continuous long term smart meter data is becoming available we are now instituting our 'Demand management monitoring framework' which will allow us to: - Investigate and understand our customers consumption patterns and attitudes to water consumption; this will allow us to model our base-line population and also understand how demographic change will modify our forecasts over time (aging). - Scientifically analyse our current demand management portfolio and ensure that our water efficiency teams are concentrating on the most effective options and targeting them at customers who will benefit the most. - Model and test demand management options, so that they can be realistically included in our future forecasts for WRMP29 and beyond. This analysis is looking to leverage the possibilities of AI, machine learning and pattern recognition to investigate behaviours and attitudes to water usage. Findings from this analysis will be shared across the industry.		

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
10	Waterscan	**The need for a major cultural shift in the water market** Water companies have a substantial responsibility to lead an urgent, large-scale cultural shift in the water industry. Perceptions are powerful and shape behaviours on all levels, so startling statistics on Wholesaler pollution events and leakage rates create a negative feedback loop that entrenches stagnation and poor practice. The market looks to Wholesalers for leadership in these and other areas. It is jarring that the more water a customer (particularly a NHH customer) uses, the cheaper this vital resource becomes. We expect Wholesalers to be much more proactive in reversing these perverse incentives in the final WRMP24s. Wholesalers need to change the narrative in the water market that propagates, rationalises, and normalises inefficient, irresponsible, and uninspiring performance. Threats to water security, water quality, and water stewardship are very much present in the here and now, so Wholesalers must not allow the current culture to seep into yet another planning cycle.	We recognise that developing our understanding of future demand, human behaviour and the potential for water efficiency, is a continual process. As our smart metering programme is being implemented, it is giving us unprecedented insight into water consumption and is opening up new avenues for interacting with and understanding our customers. Additionally, the data that smart metering is providing, is key to monitoring our demand management interventions, in addition to demographic changes that will occur in the future. This will allow us to forecast future demand with ever greater accuracy for future WRMP plans. Understanding customer attitudes, behaviours and societal influences with regard to their water usage, will be critical to the success of any future water efficiency objectives. We intend to build upon our current understanding by: - conducting longitudinal studies into our customer base, to understand long term changes in behaviour. - developing innovative concepts of 'water neutrality' and 'smart communities' into strategic actions for implementation in future WRMPs. - researching new ways of understanding customer demographics and segmentation (cluster analysis and machine learning). - trialling water efficiency initiatives with key stakeholders (including non-household options with retailers, water re-use options with developers and innovative irrigation systems) - development of our monitoring framework, in order to determine the long term benefits from our planned portfolio of water efficiency measures. - Researching methods of achieving ever lower levels of leakage and per capita consumption. Enhancing our understanding of human behaviour, with regard to water usage and the impact of our water efficiency strategies, will be key to improving our WRMP demand forecasting in future.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 10 Revised draft WRMP24, Demand management option appraisal technical supporting document, Section 7
11	Waterscan	**Inaccessible plans** On a presentation note, from the perspective of a reader, many of the Plans were extremely dense and formatted in a way that created barriers to close reading or clear understanding. This undermines the quality and integrity of the whole consultation process. The Summary documents often provided a useful overview, but the main documents were largely unwelcoming. For documents very often 100+ pages, it was surprising how often questions were left unanswered at the end. Wholesalers must think more carefully about their audience and the role these Plans play in the consultation	We thank Waterscan for its feedback. Whilst noting that the WRMP needs to contain significant technical detail in order to demonstrate the robustness of large investment programmes, we have aimed to make the revised draft WRMP24 Main report clearer and more digestible.	Yes	Revised draft WRMP24 Main report

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
		process. Some of the more digestible Plans came from Affinity Water, United Utilities, Southern Water, South Staffordshire Water, and Severn Trent Water.			
12	Waterscan	**Response to WRMP24** We strongly support Anglian Water's aim for every household and business in the region to have a smart meter by 2035. We are also interested in Anglian Water's plans to invest in water reuse and will be following these developments closely. Following the chalk stream and sensitive river restoration programme implemented from WRMP19, we encourage Anglian Water to invest in maintenance and monitoring to sustain these environments in the long term.	We thank Waterscan for its support. We will continue to engage with our customers and Retailers on water reuse, as well as our investment plans for maintaining and monitoring environments such as chalk streams and sensitive rivers.	No	N/A

2.53 Waterwise

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	Waterwise	Overall we are pleased to see significant detail in the draft plan and supporting appendices on how future demand has been calculated and the demand management options that have been considered when it comes to household demand and leakage. We do want to see the final plan reference the new UK Water Efficiency Strategy to 2030 which the company helped develop.	We thanks Waterwise for its comments and will update our revised draft WRMP24 reporting to appropriately reference the new UK Water Efficiency Strategy to 2030.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 3
2	Waterwise	We fully support the adoption of the most ambitious water efficiency option presented but would challenge the company to go further and consider options to double or triple the scale of the proposed programme given that in the short to medium term it provides the most cost effective way of maintaining the supply/demand balance. There are some areas where we think additional investment would be worthwhile.	As part of our water resource strategy, we plan to build upon our proven track record of delivering demand management savings and our ambitious AMP7 programme, through leakage reduction, our ambitious strategy for smart metering and innovative water efficiency options. Our program of demand management in AMP7, including the roll-out of over 1 million smart meters, will act as the foundation for our revised draft WRMP24 plan; one that provides economic benefits, delivers substantial water savings, and is also considered to be achievable. Our ambition is to drive the next 'step-change' in demand management through technological innovation, enhanced communications and the implementation of 'industry leading' behavioural change initiatives. Savings from our full roll-out of smart meters by 2030, leakage reduction (to our lowest recorded levels), water efficiency options and non-household options, in combination with government led interventions are expected to more than compensate for regional increases in demand due to population growth throughout the WRMP24 plan period, leading to our lowest recorded levels for both leakage and per capita consumption. We anticipate savings of approximatley 220Ml/d by 2050, from our most ambitious program of demand reduction. We will continue to review and monitor our strategy, whilst developing new and innovative strategies, accelerating demand reduction where feasible.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document
3	Waterwise	Whilst we support the plan to run a campaign on leaky loos targeting traditionally metered (and unmetered?) customers assigning just £24k for it in a total budget of £17m seems too low given the scale of the problem. One possibility would be to work on a collaborative campaign on leaky loos with other water companies, the BMA and Waterwise as recommended in our position statement.	Note that the leaky loo campaign described is the residual campaign targeting visual read customers and this consequently reduces to zero as we achieve full smart meter penetration. Our main 'leaky loo' targeting programme is described as part of our smart meter leakage programme for plumbing losses as well as our 'plumbing loss option for vulnerable customers'. We are currently saving approximately 4.5l/prop/d, due to smart meter continuous flow detection and our 'customer leakage journey'. As we improve our 'customer leakage journey' (including 'virtual visits') we expect that these savings will increase to 10.89	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			l/prop/d by 2032. We are also expecting to assist and incentivise vulnerable customers to fix leaks with our 'Target 100' option at a cost of £3.8m in AMP8 (many of these leaks will be leaky loos).		
4	Waterwise	There does not appear to be any programme of household water saving audits planned. This omission, if correct, should be reviewed and a programme targeting high users; those with affordability concerns and those transitioning to a smart meter considered for inclusion in the final plan. Thames Water's targeted smarter home visit programme is delivering sustained savings of 70 litres per property.	Whilst developing our water efficiency strategy we have reviewed our current option implementation and produced revised future options. This has meant that some of what are currently called 'Drop 20' high consumption visits have been re-allocated to our leakage reduction options and visits (our Plumbing Loss Uplift options for vulnerable and non-vulnerable customers), and some of these activities will continue as business as usual visits. For WRMP24 we did not specifically include this option as a stand-alone enhancement, but a key element of the plan is smart meter identified interventions, with water efficiency at the core. Note that for AMP8 we intend to spend over £4M for cspl/plumbing loss incentivistaion/find fix/assistance and over £38M by 2050 . We are constantly reviewing these activities and plan to assess their effectiveness as part of our 'Demand management monitoring framework'.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 6, 7 and 10
5	Waterwise	We would encourage Anglian to also include a campaign to raise awareness on dual flush toilet buttons. Research by ESW has found 20% of people incorrectly identify which is the small flush button in their own homes.	We are constantly looking at areas where we can support water efficiency through our communications campaigns. We are currently looking at how we might leverage smart meters and our MyApp mobile system to tailor messages to our customers and deliver information in a meaningful way. We will look at how we might add messaging regarding dual flush systems to these campaigns in collaboration with other stakeholders, such that campaigns might be delivered regionally and nationally.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 7 and 10
6	Waterwise	A number of water sector trials across the UK (Sussex, Affinity, NWL, UU) are finding that flow controllers can reduce consumption by around 30-64 litres per property per day. It would be good to see Anglian including a programme to fit these devices alongside the meter as part of the metering roll-out or alternatively in all new build homes/on change of occupancy. As well as targeting new build Anglian Water could also work with local authorities and housing associations to install them in social housing.	We are currently looking to trial this flow restriction technology in the Anglian Water region and will look to validate potential savings through our 'Demand management monitoring framework'. If these fittings are seen to be effective we would consider a wider roll-out, but would note that, as with smart metering, we would need a wide roll-out to have a major impact on the our demand requirements. We also note that water wholesalers are now facing a new challenge in introducing technologies to new build properties, as the incidence of NAVs is now increasing exponentially. Anglian Water will have no relationship with NAV new-build customers, who will be solely served by the NAV companies. We are currently liaising with major NAV companies in the Anglian Water region in order to co-ordinate our water efficiency strategies in a coherent fashion.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 10.

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
7	Waterwise	We fully support the proposed smart meter roll-out to HH and NHH properties and the option of a 2 AMP roll-out. Our research coupled with the experiences of Anglian and Thames Water to date have shown that smart metering is a game changer when it comes to reducing leakage and engaging with customers on water use and water wastage.	We thank Waterwise for its support.	No	N/A
8	Waterwise	We fully support the proposed move to compulsory metering. The current situation where nearly 90% of Anglian's customers pay based on what they use and 10% do not is clearly unfair and given the water availability challenge faced in the region is also unsustainable. Everyone on a meter should be charged based on usage and there must also be a programme to meter all the remaining unmetered customers as part of the 2 AMP smart meter roll-out programme.	We thank Waterwise for its support. To be clear, at present 84% of household customers pay based on what they use, 6% could do (but choose not to) and 10% are unmetered (99.5% of non-household customers are metered). We anticipate that by 2030 90% of household customers will be metered and paying based on what they use.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document
9	Waterwise	We are pleased to see that Anglian Water recognises the potential contributions to demand reduction from government policies such as water labelling of products. We are asking all companies to include a budget in their final plans to support/promote the roll-out of water labelling in AMP8 helping to explain to their customers why it is important and how they can use the label. The trial of a linked incentive scheme could also be considered. There are further opportunities to secure additional savings through more ambitious policy with regards to new build development and retrofit and we would urge Anglian Water to continue to work with Waterwise to advocate for more supportive policies.	We fully support the concept of water efficiency labelling and consider it to be integral to our reaching the 110l/h/d target for 2050. We will investigate the potential for supporting the roll-out of 'white good labelling' as part of our 'Demand Reduction Discovery Fund'. As progress is made with regard to the implementation of this policy, we will be keen to collaboratively promote the roll-out.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Sections 7 and 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
10	Waterwise	The dWRMP24 plan is very weak in terms of both the understanding of future non-household PWS needs and any options or plans to reduce NHH water demand. This is a major omission especially in light of the government's Environment Act target (which includes NHH demand reduction) and Ofwat's planned performance commitment for NHH demand reduction. The lack of a NHH demand reduction programme in its planning for PR24 is something that Waterwise has highlighted to Anglian Water over the last 12 months. It is acknowledged as a gap in the draft plan and will need to be addressed in the final plan.	We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50 (approximately 10Ml/d per 5 year AMP period). Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners. In total, these options help us achieve approximately 8% reductions by 2037/28 and 15% by 2049/50, but these reductions can only be achieved relative to the non-household demand position (including growth). We do not, therefore, believe that, achieving the absolute levels of non-household demand reduction, from the 2019/20 base-line, should be included in the revised WRMP24 plan, as this represents a degree of uncertainty with respect to the implementation of the newly developed options, which would not be prudent. As we prepare for WRMP24, we will trial options and their implementation, and develop options further for our WRMP29 plan, as we gain more experience. On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). Note this demand is not included in our potable water output or DI and, therefore, is considered an export and not part of our current non-household demand target assessment.	Yes	Revised draft WRMP24 Demand forecast technical supporting document, Section 7 Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
11	Waterwise	We very much support the inclusion of a £5m water demand reduction Discovery Fund and the potential use of the fund to explore tariff trials and other novel approaches to reduce demand. Care will be needed to ensure it provides additional value to both the existing water industry collaborative water efficiency fund and the proposed Ofwat water efficiency fund.	We appreciate the support for the 'Demand Reduction Discovery Fund' and will be keen to liaise with all interested parties to co-ordinate approaches to research into current and future demand reduction strategies. As part of our preferred plan we have included an innovation fund, in order to further our understanding of customer behaviours and the potential for future water efficiency initiatives. We have termed this our 'Water Demand Reduction Discovery Programme'. This programme will be used to identify and fill evidence gaps, regarding water demand, customer behaviours and water efficiency programs. It will help inform future forecasting for our WRMP, WRE and PR submissions along with our Long-Term Delivery Strategy (LTDS). The additional knowledge generated will be key in facilitating our ambitions with respect to demand reductions, feeding into our adaptive planning processes. Demand reduction will be crucial for the sustainability and resilience of the water supplies in the East of England, whilst maintaining Anglian Water at the forefront of water efficiency in the sector. It is envisaged that the programme will support research into the long-term effectiveness of demand management interventions. It will enable rigorously designed trials into the effectiveness of different types of metering, technological and behavioural change interventions over a five-year period. It will enable on-going monitoring of our 'Enabling Water Smart Communities' project, answering important questions about how we might encourage new developments to adopt an integrated water management approach and incorporate measures like localised water re-use (evidencing how these will be used by communities to reduce demand). Continuous monitoring and evaluation of this innovation project should provide valuable evidence to support future local plan policies, as well as demand options for future WRMPs. Our intention, is also, that the programme should be used to evaluate water efficiency measures that we wish to implement with our Retail colleagues, for the non-household sector. These measures will include; - the provision of detailed consumption data, - the incentivisation of water efficiency through audit, advice and the potential for device replacement, - leakage reduction in the non-household sector We will also investigate the potential for water re-use options. These options will all need trials and evaluation, before full implementation. Water neutrality is both a risk and an opportunity which is quickly approaching our region. This programme will be used to help ensure that the region is better prepared for the potential impact of water neutrality	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 10

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			on growth. It will be used to develop our understanding, and expand our evidence base of multiple aspects of water efficiency, re-use and offsetting, which feed into water neutrality. We will look forward to liaising with key stakeholders including Waterwise on these projects.		
12	Waterwise	A portion of the potential deficit in the Anglian Water area is driven by future decisions on the type and location of future development. We believe that developments in a region with such a large water deficit and especially in areas where the companies' abstraction licences are being capped or reduced to protect the environment, should be water demand neutral. This could be achieved through proactive collaborative work with planners and developers at a WRZ or catchment level in these sensitive areas. The company should also consider how it's developer incentives can be refreshed to help minimise the water demand footprint of new development and Thames Water have a good existing example of this.	We have been working collaboratively with developers and local authorities in order to ensure that new housing developments are as water-efficient as possible. We are actively supporting the development of Local Plan policies which require higher water efficiency standards, as a means to reduce demand (110 litres/head/day) and we track the current level of standards applied across the region. We are also investigating trialling alternative water re-use solutions at a development scale (grey-water and/or rainwater harvesting technologies) in order to achieve 80 l/h/d potable consumption. Our role out of smart metering will enable effective monitoring of water demand in new homes and inform the need for higher water efficiency standards in new homes and interventions to support existing customers to reduce their use of water. Additionally, we have been liaising with government and local authorities in order to revise water building standards to reflect the risks within our region and support our path to net zero carbon by 2030. New Appointments and Variations (NAVs) are companies appointed by Ofwat to provide water and/or sewerage services for a specific geographic areas. These companies are taking a more active role in delivering water services in our Region. We are liaising with these NAV companies in order to align our water efficiency programs, and ensure that customers in these areas also achieve the levels of water efficiency that we expect to achieve as part of our revised draft WRMP24 (110 l/h/d by 2049/50).	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 10
13	Waterwise	We encourage as you develop the final plan to consider the impacts on social wellbeing and how you will understand impacts of decisions, including in the long-term following trade-offs, on the diverse members of the Anglian Water customer base.	Our best value planning framework, which has been used to determine our best value plan, is aligned to our strategic company outcomes, which are themselves aligned to the UN sustainable development goals. This includes the objectives of 'fair charges, fair returns' and 'positive impact on our communities'. One of the biggest opportunities to improve social wellbeing through our WRMP24 plan is the strategic reservoir options, which should enable improved access to recreational facilities, blue and green open space, and related positive health and wellbeing effects.	No	Revised draft WRMP24 Decision making technical supporting document, Section 3 Environmental, social and corporate governance pages on our website

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
			The delivery stage of our plan will be informed by our six capitals value framework, which includes social capital. Further information about how we embed social wellbeing into our wider decision making processes can be found in the environmental, social and corporate governance section of our website.		

2.54 Wave

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1		Wave actively works with all it's NHH customers to improve water efficiency and reduce water loss. A particular focus is the large industrial sites on the South Humber Bank. Government policy requires these (and all) customers to decarbonise their operations. Wave is actively working with AWS and the South Humber Bank industrial cluster to assess the implications on water demand of the decarbonisation projects (which are significant) and the availability of additional water resources (which are extremely limited and reducing). The decarbonisation projects typically involve carbon capture utilisation and storage and hydrogen production. Both technologies require significant additional volumes of water, above and beyond current customer demands. Whilst there are further Government funding announcements expected over the coming weeks and months, it is estimated over the coming years the additional water demand is of the order of 45 megalitres per day (equivalent to an additional large water treatment works). Initial discussions suggest additional resources can be considered by utilising wastewater re-use schemes at Immingham Town and Grimsby Town wastewater treatment works and a desalination facility in the area. Time is of the essence as the first projects are expected to be commissioned by 2027. The draft regional water resources plans made available at the end of 2022 cover a broad range of topics such as climate change, supply-demand deficits, land management and environmental outcomes. However, there is a lack of detail regarding industrial growth and consequently uncertainty around future water consumption demands. For example, the Water Resources East (WRE) Regional Water Resources Plan considers water use by the industrial sector in 2025 and 2050 (page 21), where future water needs for energy production are noted as highly uncertain, with a potential range of 28-347 megalitres per day being required. Similarly, current abstraction volumes used in industry are noted but demand projections are limited. Wave's discussions with regulators indicate that current water abstraction consent levels will be noticeably reduced for many industrial businesses, placing greater reliance on the AWS supplies for both current levels of water consumption and future increased water consumption driven by decarbonisation or growth. The proposed WRE regional plan shows transfer of water from areas of surplus to deficit, without overlaying the future industrial demand.	We have been keen to liaise with all stakeholders, and appreciate Wave's contribution, with regard to Hydrogen production and carbon capture in the South Humber bank area. As noted, water resourcing for these new industries is proving a challenge within the framework we currently operate, and with the requirements for demand reduction. As part of our revised draft WRMP24, we have consulted with businesses who are proposing to develop in the SHB and have assessed initial requirements to be approximately 60Ml/d in the near term, up to 2032. We have, consequently made an allowance for both potable and non-potable needs based upon these consultation responses, as part of our non-household demand forecast. These requirements have been added to our core non-household demand forecast, which is based upon historic regression analysis (sector by sector at the sub-regional WRZ level) and future assessments of population growth, GVA and employment. WRE analysis has also included additional assessments of industrial, energy and agricultural requirements. We will continue to liaise with all parties to find solutions to meet the water requirements for these new industries.	Yes	Revised draft WRMP24 Demand forecast technical support document: Section 7 Revised draft WRMP24 Demand management preferred plan technical support document: Section 7

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
2	Wave	Wave would strongly request AWS includes in its WRMP a delivery mechanism to facilitate additional water resource availability for industrial decarbonisation.Wave will continue to offer significant support to this end, working closely with customers and AWS to develop and scope the water volume and quality demands, actively working to minimise current water consumption for NHH customers and supporting a joined-up approach to deliver Government policy relating to the decarbonisation plans and secure the prosperity of the region.	Whilst developing our WRMP24 non-household demand forecast, we have been liaising closely with key industries and stakeholders, with regard to Hydrogen production and carbon capture, mainly with respect to the South Humber Bank industrial cluster and Hartlepool. Through our draft WRMP24 consultation process these companies have given an indication of the volumes of water (mainly non-potable) that potentially will be required in the near future and we have, consequently, included an allowance for an increasing requirement over the next AMP and beyond (approximately 60Ml/d), for both potable and non-potable water. We will continue to liaise with our industrial partners on how these requirements can best be fulfilled, however, this would seem to be in contradiction to our required targets for non-household demand reduction.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9 Revised draft WRMP24 Demand management option appraisal technical supporting document, Section 6 Revised draft WRMP24 Demand forecast technical supporting document, Section 7
3	Wave	**Specific areas of concern** It is acknowledged that the NHH customer base accounts for a significant percentage of total water demand. We do not feel that AWS' WRMP fully recognises this significance or the opportunities that it affords. We believe a greater emphasis within the WRMP on NHH demand is required, particularly considering the decarbonisation challenges faced by all organisations in the UK. Increased water demand, however efficiently it is used, is a reality over the coming years and Wave welcomes an open discussion with AWS on plans for delivering this water, to facilitate decarbonisation and meet individual growth requirements for the region.	Non-household consumption accounts for a substantial proportion of overall demand in Anglian Water, representing 27% of our total demand (2022/23). Understanding and forecasting this segment of demand is crucial to the demand forecasting process. We have recognised the importance of demand management with regard to the Retail and non-household sector. We have consequently designed a portfolio of non-household options which are expected to save 10Ml/d of water by 2029/30 and 50Ml/d by 2049/50. Where feasible we have tailored options to achieve a 9% saving, whilst also reflecting current consumption volumes, smart meter data, and current savings estimations for ('plumbing loss' and cspl). We are currently experiencing significant growth in non-household demand, with requests for large volumes of water in the near term (those regarded with certainty have been included in the revised draft WRMP24 forecast). We have pragmatically included a non-household forecast aligned with our revised draft WRMP24 population forecast, reflecting Local Authority growth and strategic growth associated with the OxCam arc (13.8% to 336Ml/d growth by 2049/50 - BL forecast). On the basis of our consultation responses, we have included demand that might be associated with potential Hydrogen production and carbon capture (approximately 60Ml/d by 2031/32). We have also been mindful of the Defra/EA 9% target for non-household demand reduction by 2037/38 and the 15% reduction by 2049/50. We have consequently designed a set of non-household water efficiency options to help us achieve these targets (with individual targets set at 9%). Non-household options will need to be delivered in collaboration with, but mainly via our Retail partners.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
4	Wave	AWS' ambitions regarding smart metering are very positive and, with NHH customers making up such a significant proportion of overall water demand, we believe targeting these customers with smart metering will improve market data, ensure correct revenues and also crucially deliver significant water demand reductions. We also welcome AWS' proactive approach in seeking market solutions to the sharing of smart meter reads in the central market system.	We thank Wave for its support.	No	N/A
5	Wave	We believe it is important that AWS works with Wave to raise awareness of future water resource concerns with NHH customers. This will both educate and influence behaviours.	We fully agree that we need to work with Retailers and their customers in order to frame the conversation regarding water stress and the environmental destination for the Anglian region. We intend to utilise the outputs of our current WRMP to inform this process and build our communications strategies, as all stakeholders need to be involved in reaching our stated goals for non-household demand reduction.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 7
6	Wave	It is essential that AWS and Wave work together on water efficiency and other demand reduction projects. Assisting Wave in understanding key geographical areas that have particular demand concerns will help concentrate efforts to target customer behaviour in those areas. Wave and AWS are well placed to work collaboratively on these projects with the existing water resource data AWS has made available.	We will look forward to continuing to develop the non-household demand management strategy with Wave and will continue to share (and enhance) our data-sharing activities, highlighting geographical areas of risk.	Yes	Revised draft WRMP24 Demand management preferred plan technical supporting document, Section 9

2.55 WRE

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
1	WRE	**Feedback for the draft Regional Plan** The feedback is generally very supportive of our draft Regional Plan. The results show that respondents: · agree that we have presented credible region-wide projections of future water needs across all sectors and the environment; · support our goal to achieve the most ambitious environmental outcomes as described by the 'Enhance' scenario; · endorse the balance we have struck between demand- and supply-side options to resolve the projected public water supply deficits; · accept that the proposed plan includes the right low regret, supply-side options in the short, medium and long term; and · agree, often strongly, that our proposed plan has been co-created in a fair, open and transparent way	The WRE plan is closely linked to our WRMP and selects the same SROs. As such it is important that stakeholders are supportive of the Regional Plan.	No	N/A
2	WRE	**Further refinement areas** WRE will work with Anglian Water to demonstrate that our plan represents best value for all sectors and the environment, even though some reductions in licenced abstraction volumes may not be achievable as quickly as some stakeholders would like. We will also need to justify very clearly any cost differential between the 'least cost' and 'best value' pathway, as part of a strengthened assessment of the costs and benefits, taking full account of the often uncosted externalities and wider benefits, and sensitivity analysis for both the demand and supply-side aspects of the plan.	The WRE plan update will be able to draw on the findings of our revised draft WRMP24 to help demonstrate this.	No	N/A
3	WRE	WRE will aim to reconsider the case for further demand-side action, in the context of clear expectations that the national targets for leakage, per capita consumption, and public water supply consumption per capita will be achieved by all companies, together with the new interim targets for 2027 and 2032 included within the government's Environmental Improvement Plan 2023. In particular, we recognise the potential to go further with non-household options even though requests for new non-household connections including for green hydrogen production could make a net 9% reduction by 2038 difficult to achieve. We also need to explain how we can be confident in our demand-side ambitions and show the further compensatory action that would be taken if savings fall short.	The revised draft WRMP includes further demand-side action in support of lower leakage, PCC and demand targets. It now includes a detailed plan for Non-Household Demand, although as recognised, meeting the Government's 9% reduction target will be challenging and may affect other Government aspirations e.g. net zero. Our revised draft WRMP has looked at the sensitivity of the plan to scenarios including a lower effectiveness of demand management.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Decision making technical supporting document

No.	Consultee	Feedback from consultee	Our response	Change made	Where further information can be found
4	WRE	WRE will look to exhaust the potential to bring forward further, cost-effective supply-side options to help meet the forecast deficits in the short to medium term, without straying from or undermining the long-term best value pathway. We will also need to be able to satisfy stakeholders that the significant growth projections in the region can be accommodated at the same time as making progress on improving environmental outcomes.	Our revised draft includes a number of small supply-side options. We also demonstrate how growth can be managed whilst reducing abstraction.	No	Revised draft WRMP24 Demand management preferred plan technical supporting document Revised draft WRMP24 Decision making technical supporting document
5	WRE	We will look as part of the regional planning process to show that the environmental improvements promised by the plan are real and significant, have been prioritised to achieve early benefits for sensitive waterbodies (including but not limited to chalk streams), and with the potential for abstraction reductions to be complemented by nature-based approaches and river restorative action once more detailed investigations and optioneering are undertaken.	We are committed to significant environmental improvements through implementation of our WRMP. We have prioritised our environmental destination programme such that sensitive waterbodies will benefit first. We will explore how nature-based solutions can assist with environmental improvements as part of the WINEP investigations.	No	N/A
6	WRE	WRE will look to explain the role that drought management strategies and levels of service play in managing the risk of water supply shortfalls. This should factor in the lessons from last year's agricultural and environmental drought.	Drought management actions are build into our WRMP with appropriate triggers and relate to agreed levels of service. Specific drought management actions are described in our Drought Plan.	No	Drought Plan 2022
7	WRE	WRE will aim to maximise the potential for significant additional public benefits from the two major new reservoirs proposed in our plan. For example, exploiting open channel transfers rather than underground pipelines to bring water to the reservoir sites will be a key enabler of wider benefits for agriculture, flood risk and water level management, for biodiversity improvement and potentially for navigation.	We recognise the potential for significant additional benefits associated with the reservoirs. We will continue to explore these with stakeholders including the Fens Water Partnership and the Lincolnshire Reservoir Working Partnership. We will provide an evaluation of wider benefits as part of our RAPID SRO Gate 3 submission in September 2024.	No	N/A
8	WRE	We will work collectively to make sure the suite of regional plan documentation does justice to the huge amount of engagement and cutting-edge modelling and analysis that underpins our respective plans - including the multi-sector dimensions.	We continue to work with WRE and regional stakeholders to provide high quality information relating to the Regional Plan.	No	N/A

3. Addendum

On the 29th August 2023, we published our Statement of Response to the feedback received on our draft WRMP24 consultation. This Statement of Response, supported by a suite of revised WRMP24 documents, detailed the 55 consultation responses received, our feedback to these representations and any changes that we made as a result.

We received a letter from Defra on the 10thJanuary 2024, requesting further information in support of our Statement of Response. The five issues identified as requiring additional information were:

1. The protection and improvement of the environment
2. Parallel development of alternative options, specifically desalination
3. Monitoring demand management efficiency
4. Non-household consumption; and
5. Best value evidence

Following Defra's request for further information, we separately met with each regulator (the Environment Agency, Natural England and Ofwat), and convened with them together in a joint meeting with Defra. Further sessions were then held with the Environment Agency to discuss Issue 1.

These discussions, held between January and March 2024, have helped us to develop this addendum to our Statement of Response. We have published this addendum so that stakeholders can understand how we are addressing the issues raised by Defra and have visibility of the information that will inform the Secretary of State's decision making.

We have summarised the issues raised by Defra and provided a précis of our response below. For further detail please refer to the detailed table later in this addendum.

3.1 Issue 1: the protection and improvement of the environment

Defra stated that we had not fully assessed the implications of forecast growth on abstraction at an individual licence level in our revised draft WRMP24, highlighting that this analysis could inform when there might be a risk of environmental deterioration (under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017). Consequently, Defra asked us to assess expected abstraction growth at a licence level across all of our sites, and reflect any implications this has for deterioration risk and licence change requirements.

We have shown how we will manage the risk of deterioration at the spatial level required for a WRMP. This strategic level, that of a water resource zone, is informed by the WRMP Direction. We built on this for revised draft WRMP24, following the Environment Agency's representation to our draft WRMP24 consultation, by producing a Sustainability Reductions annex. This annex, which was issued to the Environment Agency, detailed how the risk of deterioration would be managed with demand management.

Following our recent discussions with the Environment Agency, we have agreed that we will build on this Sustainability Reductions annex, outside of the WRMP24 approval process. This analysis will assess the risk of the waterbodies in our region suffering from deterioration if abstraction was to increase, albeit with a recognition that it is difficult to predict how we will operate individual licences over a significant period of time. The waterbodies will be prioritised in liaison with the Environment Agency, and our analysis presented to the regulator in a phased approach, finishing by the end of December 2024. If there are consequences of this analysis for WRMP24 we will agree how to address them in discussion with the Environment Agency, for example as part of the WRMP Annual Review process.

We would also like to assure our regulators and stakeholders that we do have appropriate and established mechanisms in place to manage the risk of deterioration: this is through our existing abstraction monitoring system. This real time reporting system has alarms to alert us when abstraction exceeds a pre-set threshold, allowing us to respond urgently. The threshold can be set at the level permitted in the abstraction licence, or at a lower level, such as recent average. The system also allows us to track abstraction against the threshold we have set; if we are tracking above this, we put in place mitigation measures to reduce the volume of water abstracted. These measures can include rezoning or enhanced water efficiency and leakage measures in the water resource zone.

We report on these volumes to the Environment Agency on an annual basis; this will shortly increase to quarterly reporting. We would also liaise with the Environment Agency and Natural England (if appropriate) as soon as we felt we were at risk of abstracting over the thresholds.

We were also asked to have an adaptive plan for the potential, but as of yet unknown, licence reductions that could be driven by upcoming Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) assessments. These assessments are due to conclude before 2025.

Following liaison with the Environment Agency since the Defra letter was issued, it has been agreed that it is impossible to include the possible Habitats Regulations reductions as the level of information required to quantify this is not available at present. Instead, we will be informed by our WINEP AMP8 Environmental Destination investigations (which will be started as soon as we are informed of the objectives we need to achieve by the Environment Agency), as well as work being undertaken by Natural England and the Environment Agency. We ask that both regulators continue to collaborate with us on these investigations.

The WINEP AMP8 Environmental Destination investigations will take a holistic view by looking at the possible implications of meeting the objectives that will be set, for example the possible groundwater flooding that could occur by reducing abstractions. To act before this information is available will result in a cost to the customer, and possibly the environment, that is uninformed and potentially not needed.

However, we do appreciate that we must prepare for further reductions than initially forecast in our revised draft WRMP24, so have liaised with Ofwat for further funding in AMP8 for the development of the Bacton desalination option. This additional funding will ensure that we are able, if identified as needed in WRMP29, to put Bacton desalination into supply in 2034 rather than 2040.

3.2 Issue 2: parallel development of alternative options, specifically desalination

The letter from Defra stated that there is a high likelihood that the adaptive planning scenario requiring desalination options will be triggered. Two particular areas of concern were highlighted: the AMP8 schemes for the Lower Nar and Wixoe and household and non-household growth. Consequently, Defra advised us to start working on our adaptive planning options immediately.

The Lower Nar and Wixoe schemes are aligned with the recently issued guidance from the Environment Agency on Environment Destination. We have asked the Environment Agency for focused collaboration on these matters since our joint meeting with Defra.

We are assured that we have forecasted our household and non-household growth in line with the Water Resources Planning Guideline, as well as targeted discussions with our large non-household users. Headroom has accounted for uncertainties.

As such, and in line with the approach to the Habitats Regulations investigations (see Issue 1), we will not trigger a desalination option now. However, we will accelerate the development of the Bacton desalination option, such that we could deliver it by 2034 if required.

3.3 Issue 3: monitoring demand management delivery

Defra highlighted their concern about the lack of detail on our demand management monitoring. We were also asked to specify the values at which we would trigger an alternative pathway.

Since our revised draft WRMP24 was published, we have been maturing our demand management monitoring framework. We are confident that this will allow us to understand usage, and the effectiveness of our measures, like never before. We have now attached trigger points to the measures that will be used in this framework but do expect these to be refined as we gain more intelligence through its use.

3.4 Issue 4: non-household consumption

Defra raised concern that our recent non-household consumption was higher than forecasted in WRMP19. They asked us to reconsider our WRMP24 forecast and how we will bring down non-household demand.

Our recent non-household consumption is reducing, as is our distribution input which is a better proxy for abstraction and risk of deterioration than any individual demand component. We are confident that we have the

expertise in demand management to continue these reductions, although we expect some variation on a yearly basis. When we do see any trend which is not in line with our projections, we will use our demand management expertise to deploy additional, targeted measures.

We have also implemented a non-household policy which will ensure we only supply water for non-domestic purposes that is included within our forecast. This means, of the 56.57 Ml/d of water requested for non-household use in 2023/2024, we have offered 4.33 Ml/d. This is 7.65% of that requested.

3.5 Issue 5: best value options evidence

Defra stated that we had presented sufficient information that the sizing and timing of the strategic resource options represented best value, and that this would further be addressed through the RAPID process. However, they asked for further evidence why we had not included transfers from other regions into our water resource zones.

Since liaising with Defra, we have spoken to our neighbouring regional groups and companies again to determine if their situation has changed since the last time we met. We can confirm that it has not, and we will reassess the feasibility of any transfers after the companies have conducted their WINEP Environmental Destination investigations.

3.6 Summary

In summary, we have liaised with Defra and our regulators to determine a balanced approach to the five issues that have been identified. This liaison has seen us ask Ofwat to increase funding for Bacton desalination so, if an adaptive pathway is triggered, it could be put into supply in 2034. However, we remain confident that our demand management measures will be as effective as forecast. We will track these in real time through our demand management monitoring framework.

We are assured that we have managed the risk of deterioration at a level appropriate to the WRMP. In liaison with the Environment Agency, it has been agreed that we will conduct a licence by licence analysis of the risk of deterioration in a process that is decoupled from the approval of WRMP24. This analysis will inform any updates to WRMP24 and any Regulation 19 applications and allow the Environment Agency to consider plans for growth in a considered manner. We are satisfied that we have a robust abstraction monitoring regime in place to monitor the risk of deterioration.

We remain committed to working with regulators to determine the best solution for non-household demand, as seen on the South Humber Bank, and are taking decisive action to manage new non-household requests. We are also fast tracking our trials of non-household measures so we can start learn from them and roll out the successes more widely.

Regional working remains important to us and we will continue to liaise with our peers to determine if they have surplus water we can utilise.

Overall, we believe that our revised draft WRMP24 balances action with investigations, and will provide the best outcomes in the long-term for the environment, our region and our customers.

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
1a	Defra	Your revised draft WRMP states that the demand management strategy enables environmental deterioration to be avoided. However, to avoid short term deficits you continue to be dependent on deferring some changes to your abstraction licences until 2036. These changes are needed to meet the requirements of Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 to prevent the risk of deterioration in the status of water bodies.	Our revised draft WRMP shows that the expected increase in household and non-household customers (developed in accordance with the Water Resources Planning Guideline) over the next 25 years will be offset by the water savings achieved through our demand management strategy. This means that we will not abstract any more water than we do now. As set out in our revised draft WRMP24, we need to defer some of our abstraction licence changes until 2036 in order to avoid short term deficits. These changes were identified by the Environment Agency after WRMP19 and PR19 had been finalised, delaying the development of mitigative supply-side measures. The supply-side options needed to mitigate the impact of the abstraction reductions have been included in revised draft WRMP29 and the draft business plan for PR29, as well as through the Accelerated Infrastructure Delivery and RAPID programmes of work. However, none of these options are available in the short term. To put it simply, we are unable to take any further groundwater, so we have to develop options that have significant lead times due to either design complexity, planning processes and/or significant monitoring that is required to be completed prior to the initiation of design. We also contend that there is no scientific evidence that deferring these caps will result in the deterioration of a waterbody. Consequently, we are planning to develop our understanding of this through our AMP8 WINEP Environmental Destination programme, for which we have transition funding as we recognise its importance in shaping the future water strategy for the East of England.	No	Revised draft WRMP24 Decision making technical supporting document, Sections 5 and 10 AWS PR24 Business Plan Revised draft WRMP24 Main report, Section 8 Revised draft WRMP24 Decision making technical supporting document, Section 9
1b	Defra	You have not fully assessed forecast licence level growth to inform the timing and assessment of Water Framework Directive deterioration risks. You have not sufficiently demonstrated how any potential risks of deterioration and licence changes would be managed through the WRMP before 2030. Action is required to further manage the significant environmental risks, the uncertainty surrounding levels of growth and the reliance on effective demand management by:	For revised draft WRMP24, responding to the Environment Agency's recommendation, we produced a Sustainability Reductions annex. This 74 page document included Water Resource Zone maps that identified locations where our groundwater abstraction assets are in proximity to sensitive environmental receptors. Planning Zone level demand graphs were also included; these demonstrated how our demand management options would prevent deterioration by reducing abstraction over time. When it was identified that abstraction could increase, mitigation proposals were highlighted, such as a zone being able to import water from surrounding zones.	No	Revised draft WRMP24 Sustainability Reductions annex (SEMD protected document)

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
		Investigations - Before finalising your plan, you should assess expected abstraction growth at a licence level across all your sites and reflect any implications this has for your deterioration risk and licence change requirements, following 2018 guidance . The approach should be discussed and agreed with the Environment Agency.	Following discussions with the Environment Agency post the Defra letter, we will build on this Sustainability Reductions annex. This will occur outside of the WRMP24 approval process. This analysis will assess the risk of the waterbodies in our region suffering from deterioration if our abstraction was to increase, albeit with a recognition that it is difficult to predict how we will operate individual licences over a significant period of time. The waterbodies will be prioritised in liaison with the Environment Agency, and our analysis presented to the regulator in a phased approach, finishing by the end of December 2024. If there are consequences of this analysis for WRMP24 we will agree how to address them in discussion with the Environment Agency, for example as part of the WRMP Annual Review process.		
1c	Defra	Monitoring - You should clearly set out in your plan how you will monitor the levels of abstraction and ensure that the risk of deterioration is and remains low across all licences.	We already operate a thorough monitoring regime for our abstraction licences which we report on with full transparency to the Environment Agency- this is a requirement of our abstraction licences. This existing abstraction management process collects flow data from our abstraction flow meters, via a telemetry system. We use this data for regulatory reporting purposes and for our own internal monitoring; the latter informs any mitigation we need to deploy to reduce the volume of water abstracted. Such mitigation may involve rezoning areas onto different source waters or enhanced leakage activities in that area. We also have real time alarms, tailored to each individual abstraction licence, so we are warned in real time of the potential for over abstractions. Our regulators have full visibility of our abstraction data, with it being periodically downloaded (currently annually but moving towards quarterly) for uploading to the Environment Agency's "Manage your water abstraction or impoundment license" service. This abstraction data is subject to independent annual audit as part of the Annual Performance Review submission to Ofwat.	No	Annual Performance Review
1d	Defra	Action - In the event of abstraction increases, you should clearly demonstrate how you will move to your adaptive plan with feasible options deliverable in the timeframes required to ensure a surplus supply demand balance.	We have shown in the revised draft WRMP24, to an appropriate level for the plan, how we will manage the risk of deterioration. However, following liaison with the Environment Agency, we will develop a licence by licence analysis as a separate exercise. We have highlighted how we will manage deterioration risk through the implementation of demand management, with an adaptive pathway if demand management is not delivering the benefits forecasted. We had	No	Revised draft WRMP24 Decision Making technical supporting document, Sections 5 and 10

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
		If there is a risk of deterioration, then the Environment Agency would need to take action to change licences (through section 52 Water Resources Act 1991) to limit abstraction. This must happen before the end of AMP8/2030 if needed to prevent deterioration and could be as early as 2025. The severity of risks and potential wider implications from constrained growth, which are already being seen in Cambridge, require additional immediate mitigating action set out in issue 2 below.	kept this pathway at a macro level in our reporting but before invoking a supply-side solution we would first implement interventions to get back on track with demand management, for example by increasing customer communications and enhanced focus on customer supply pipe leakage. We are confident about the effectiveness of our demand management and transparently report progress through the Annual Review process. Our ability to react quickly to underperformance of any of our suite of demand management measures will be enhanced by the implementation of our demand management monitoring framework. This framework will continually track performance, informing decisions on how to adjust demand management in a timely fashion.		
1e	Defra	Where the Investigations and Monitoring show abstraction increasing, in addition to moving to the adaptive plan the required action should include site specific measures that alleviate any impacts on Protected Sites as a result of such increases. These measures would need to be agreed with Natural England and other regulators.	We already have close liaison with Natural England and other regulators. We would use this ongoing engagement to highlight any concerns about abstraction increasing and discuss any measures that are required.	No	
1f	Defra	There are also likely to be additional licence changes associated with the outcomes of upcoming Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) assessments, due to conclude before 2025. The scale of these licence changes is currently uncertain until assessments have concluded. Your WRMP must cater for these potential licence reductions and set out how you would maintain secure supplies of water. This should be included as an adaptive plan with reductions from 2025, and you must ensure your plan sets out the means by which you will ensure you meet your Habitats Regulations obligations.	We had included likely reductions due to the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) in our revised draft WRMP24 forecast; this was in response to the Environment Agency's representation to our draft WRMP24. This encompassed two licences. Since then, we have been notified by the Environment Agency of likely additional licence changes associated with the Habitats Regulations. This now extends to 36 of our licences, related to the Broads SAC, Norfolk Valley Fens SAC and Waveney and Little Ouse Valley Fens SAC; these have a total licensed volume of 194 Ml/d which is nearly 10% of our company licences by volume. The extent of these licence changes is currently uncertain until the Environment Agency's initial habitats regulations assessments have concluded, which is likely to be in the Autumn of 2024. Our understanding is that these investigations are only considering what abstraction reductions are needed to meet the objectives of the designated sites at this moment in time. This means that the current investigations are not taking into account future climate change and the possible consequences of reducing abstraction, such as widespread flooding and infrastructure inundation.	No	Draft WRMP24 Statement of Response, Environment Agency representation Revised draft WRMP24 Sustainable abstraction and environment technical supporting document, Section 7 Revised draft WRMP24 Decision making technical supporting document, Section 9 AWS PR24 Business Plan

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
			Since the publication of the revised draft, through liaison with the Environment Agency, we have included additional WINEP investigation lines (under the HD_INV driver) for licences linked to the Waveney and Little Ouse Valley Fens SAC and for Norfolk Valley Fens SAC, to carry out options appraisal assessments. The deadline for this obligation is the 31st December 2026. Once these obligations have concluded, we will have the evidence for decision-making on the next steps for the licences in question. Our concern is that acting now on uncertain findings- and including such large scale reductions in our WRMP24- will result in huge amounts of investment that may not be needed, inflicting a large bill on customers. We are also unsure whether there could be unintended consequences associated with such abstractions, such as flooding and water quality challenges. We believe that the best approach is to undertake (in liaison with Water Resources East, other water companies, other abstractors, regulators and wider stakeholders) an informed approach to determining the best course of action for the environment. This will involve us undertaking our AMP8 WINEP Environmental Destination investigations and working with stakeholders, pooling our information, to develop an informed pathway for our region's environmental needs. We intend to start these investigations, using transition funding, as soon as we have been informed of the environmental objectives we need to meet. The studies will take into account future climate change, the relationships between flow and ecology and potential unintended consequences of reduced abstraction (for example, flood impacts), as well as including local knowledge on how the watercourses operate. Options appraisal will occur in parallel to this work, as well as the investigation of site specific compensatory measures if the regulatory mechanism of Imperative Reasons of Overriding Public Interest is required. We have discussed this approach with Ofwat, Defra, Natural England and the Environment Agency, and our plan to use these results to inform WRMP29, the draft of which will be published in 2027. However, we also recognise that there is likely to be larger reductions in the Broads than have been accounted for in WRMP24, even though these are of yet unquantified. This means, in response to Defra's feedback, we		

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Issue 1: Protection and improvement of the environment					
			have requested additional funding in PR24 to develop Bacton desalination faster than originally intended. This means, whilst we still plan for Bacton to be in supply for 2040, we will have the ability to bring this date forward to 2034 if required.		
Issue 2: Parallel development of alternative options, specifically desalination					
2a	Defra	Your plan includes alternative feasible desalination options including Bacton desalination. Although these are alternative options in adaptive pathways with a decision point from 2025, the Environment Agency consider that there is a high likelihood that the adaptive scenario requiring these options will be triggered.	We are confident that our demand management measures will deliver as expected. However, we are conscious that there is a higher level of uncertainty around our Broads abstractions than was forecasted in our revised draft WRMP24. Consequently, we have asked for additional funding for Bacton desalination in PR24; this will allow us to undertake monitoring and investigations in AMP8, putting us in a place that we can have Bacton desalination in supply for 2034 if required. This considered approach, rather than moving straight to planning and construction, means that we will be in a position to better understand the scale and locations of abstraction reductions (or other as of yet unknown pressures). It will also allow us time to compare the relative impacts of desalination compared to the benefits of reducing terrestrial abstraction.	No	AWS PR24 Business Plan
2b	Defra	We advise you to immediately start work on the development of these options. Your business plan already includes development funding for Bacton desalination as part of your adaptive plan funding request. If the resolution to this issue requires re-profiling this request into the transitional funding period, you will need to update your business plan submission to reflect this. If detailed design work does not commence until 2025/26, adaptive options will not be available in AMP8 to cater for the immediate risks.	We acknowledge that it is important for us to develop our adaptive plan options including Bacton desalination, and have already commenced work on this as part of our AMP7 adaptive planning programme. Work includes customer research, research on international best practice and an academic study on brine waste. We will also be commencing a coastal monitoring programme this year. We are requesting additional development funding for AMP8 above what was requested in our original PR24 submission. This will enable us to progress planning and procurement alongside technical aspects to ensure we are construction ready in AMP9.	No	AWS PR24 Business Plan
2c	Defra	The two new Lower Nar and Wixoe AMP8 supply options are uncertain and if these schemes cannot fully deliver the benefits expected, you have identified that alternative desalination options will be required.	We believe, working with the Environment Agency and Natural England, that the abstraction relocations on the River Nar and near Wixoe are feasible. Both schemes are consistent with the latest guidance on Environmental Destination for relocating abstractions to locations that are less impactful to the environment and as such provide an important blueprint for managing abstraction challenges whilst minimising the need for more expensive and environmentally challenging solutions (such as desalination).	No	Revised draft WRMP24 Supply-side options report, Section 6

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
2d	Defra	We are also concerned about the immediate risks to the environment if demand reductions do not occur, particularly if recent household and non-household demand increases continue and exceed the levels forecast in the WRMP.	Our revised draft WRMP shows that the expected increase in household and non-household customers (developed in accordance with the Water Resources Planning Guideline) over the next 25 years will be offset by the water savings achieved through our demand management strategy. This means that we will not abstract any more water than we do now and will not put the environment at risk. We are also confident that we have forecast household and non-household growth as accurately as we could have, which is in accordance with the WRMP Direction and Water Resources Planning Guideline. The former is completed using figures from Local Authorities for the first part (circa fifteen years) of the plan, with Office of National Statistics projections used for the later years (due to the planning horizon used by Local Authorities). Non-household growth is renowned for being more difficult to forecast but we have proactively spoken to existing customers with significant supplies (on the South Humber Bank) to determine their future growth needs and incorporated these into our demand forecasts. We do, however, appreciate that there is some uncertainty in these forecasts which we have built into headroom- this means that there is some surplus if forecasts were to be exceeded. We are also proactively implementing company protocols to ensure new non-household connections are in line with our predicted forecasts and within our existing distribution input. As discussed with the Environment Agency and Defra, we are confident that our demand measures (such as the continuation of our smart metering rollout, further water efficiency measures, reducing customer supply pipe leakage, and the benefits of government-led interventions such as water labelling) will provide the benefits identified. This is evidenced by our strong track record on managing distribution input since our inception in 1989. This has resulted in us achieving our lowest ever Per Capita Consumption value in 2022-23 and our smart meter rollout identifying 107,847 leaks over the same time period. Our demand management monitoring framework will add to these measures, allowing us to proactively react to any underperformance.	No	Revised draft WRMP24 Decision making technical supporting document, Sections 5 and 10 Revised draft WRMP24 Sustainability annex (SEMD protected document) Revised draft WRMP24 Demand forecast technical supporting document, Sections 3, 4, 5, 6 and 7 Revised draft WRMP24 Planning factors technical supporting document, Section 2

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
2e	Defra	Considering the risks outlined, we advise that you should immediately start developing adaptive plan options before AMP8, including Bacton desalination. This will ensure you can pivot to delivery of options in your adaptive plan from the start of the planning period if required. Additional abstraction pressures and potential constraints to growth would have severe environmental and economic implications. This means proceeding with adaptive plan options immediately is a no-regrets approach. These options are required later in the preferred plan, so work could be paused should the risks not materialise.	Work is already underway on the development of our adaptive planning programme, including Bacton desalination, and additional funding has been requested for AMP8 to enable development of the scheme so that it is construction ready in AMP9. This approach will ensure timely progression of the scheme, with a decision to be made no later than WRMP29, with the draft due in 2027. This programme means that we will be able to use the results of our AMP8 WINEP Environmental Destination investigations to deliver no-regrets infrastructure rather than something that could be under or oversized. We are committed to environmental improvement and continue with our WINEP programme in AMP8. We are actively managing our current abstractions, have proactively licence capped where possible and also surrendered certain licences. We also recognise that there is no surplus groundwater that can be utilised, and precious little surface water. This means that we are developing complex infrastructure, such as water reuse and desalination, which will allow us to reduce our groundwater abstractions further. We are aware that potential water constraints would have severe environmental and economic implications. We have been actively engaging with Ofwat, the Department for Levelling Up, Housing and Communities, and the Department for Energy Security and Net Zero, to highlight the importance of considering water needs when developing non-household plans. We continue to engage with these stakeholders to determine how the East of England can meet these demands.	No	AWS PR24 Business Plan
Issue 3: Monitoring demand management delivery					
3a	Defra	You are reliant on demand management in the short term to manage the risk of deterioration in the status of water bodies. Currently you have not clearly demonstrated how your tracking of demand management delivery will be used to trigger a decision, including what level of demand will require a formal adaptive pathway to be adopted. We consider this critical to managing the present risk.	Our recently initiated demand management monitoring framework will utilise our smart meter data, with over 700,000 now installed in our region and full roll out planned by 2030. This monitoring framework will allow us to investigate, understand and track our customers' consumption patterns and attitudes to water consumption; this means we will be able to model our baseline population behaviours and understand how demographic change will modify our forecasts over time (e.g. ageing, socio-economic influences).	No	Revised draft WRMP24 Demand management preferred plan, Section 13

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
			The understanding gained from this baseline means we will be able to analyse the water saving impacts of our demand management portfolio. This analysis will allow us to determine if the measures are as effective as we forecast for WRMP24 and, if not, provide the insight as to why this is the case. This insight will allow us to optimise our demand management strategy, for example by ensuring that our water efficiency teams are concentrating on the most effective options and targeting them at customers who will benefit the most. The effectiveness of the optimised demand management measures will then be tracked and altered as appropriate. Whilst we know that there are variations in the effectiveness of demand management measures, such as during the Covid pandemic, we have developed trigger points which would see us switch to the adaptive pathway. We will assess the appropriateness of the trigger points on a regular basis. In the longer term, there will be the ability to model and test new and revised demand management options within the framework. This will improve our forecasts for WRMP29 and beyond.		
3b	Defra	You should update your plan to demonstrate how you will trigger additional action through your demand monitoring. You should provide further detail on exactly what constitutes demand management measures not delivering, including the thresholds for each metric and total values in Ml/d. You should clarify how and when you would make the decision based on demand levels to formally switch to delivery of alternative supply options in AMP8.	Our demand management monitoring framework will allow us to adjust levels of activity and prioritisation within the overall demand management strategy, ensuring the programme is cost effective at maximising savings and at meeting the overall targets we have set out in the revised draft WRMP24. As part of the framework, initial demand management option assessments for each option (household and non-household) will be reviewed yearly. This assessment will determine the numbers of customers impacted, and the savings per person, per property and overall megalitres per day savings. For the more significant where we expect to save the most water, this yearly review will be used to tailor the subsequent years operations with regard to delivery. In regards to Defra's request for further information on triggering additional action, the mid-AMP 2027/28 point will be set as the main trigger point at which a full review will occur. At this stage, the DMO strategy will be assessed and rebalanced in favour of the most productive and cost beneficial options, based upon the assessed savings from WRMP24.	No	Revised draft WRMP24 Demand management preferred plan, Section 13

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
			Setting the trigger point at this AMP8 mid-point will allow us to account for other potential inter-year variations in consumption, as well as weather-based influences. We will also use this mid-point to re-evaluate options for inclusion in WRMP29 We have initially set the trigger value for modifying or adopting alternate demand options as 50% of the estimated demand management savings projected in WRMP24. However, we are mindful that the WRMP24 assessments relied upon limited information at the time regarding option efficacy- these will be improved upon for WRMP29. The monitoring framework will also analyse the effectiveness of demand management against the total distribution input (DI) recorded. For example, DI can be impacted by: weather and summer peaks in demand; growth assessments and increases in population which may differ from those in the WRMP forecast; non-household demand due to other economic and societal changes; and the success of Government-led interventions such as labelling. Changes in overall demand will drive the reconsideration of our overall WRMP24 programme and reassessment for WRMP29 planning purposes. We will liaise closely with our regulators if this occurs.		
Issue 4: Non-household consumption					
4a	Defra	When comparing this year's outturn Annual Review non-household consumption data to the WRMP24 2022/23 glidepath, your figure is 20.8 Ml/d above the WRMP24 glidepath. This reduces our confidence in you achieving the forecast starting position in 2025/26 which is 15.3 Ml/d below reported levels in 2022/23.	Current estimates for 2023/24, indicate that there will be a reduction in non-household consumption from our 2022/23 figures. This is in the context of a fall in overall demand (DI) values- we currently anticipate that 2023/24 DI will be less than the 2023/24 WRMP24 estimated value of 1159Ml/d for NYAA DI.	No	
4b	Defra	You have stated that recent non-household demand has significantly exceeded historical trends and in your business plan you state that you have declined more than 38 Ml/d of new non-domestic demand requests in 2023 up to mid-August.	We have seen significant volatility in recent recorded non-household demand, both in terms of out-turn figures, and with respect to recent additional requests for additional demand that have been received in the last 18 months.	No	
4c	Defra	Before the final plan is published, you should review the non-household consumption forecast including the starting position.	Catering for non-household demand is a major component in our revised draft WRMP24. Our demand forecast included a baseline non-household forecast aligned with our highest potential population scenario (Oxcam_2b_r_P). This forecast suggests potential growth in non-household demand from 305Ml/d to 315Ml/d by 2038 and 337Ml/d by 2050.	No	Revised draft WRMP24 Demand forecast, Section 7

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
			We are confident, along with the findings of our bilateral discussions with large users, that our non-household consumption forecast is built on the best information we have at this time. Where non-household demand exceeds our forecast, we will review this in the context of overall DI (to see if this is offset by greater household savings) and if necessary will implement further measures, including our adaptive planning options.		
4d	Defra	You should provide evidence through a detailed action plan on how you will achieve your forecast reduction by 2025/26 and closely monitor the progress on delivery. You should also further demonstrate that you are proposing sufficient mitigating actions to offset your non-household demand growth. This should consider potential for any additional non-household water efficiency activity, alongside the immediate progression of adaptive supply options as set out in issue 2.	Despite current estimates showing a fall in NHH demand this year, we are striving to lower NHH demand further so that it is line with our WRMP24 target. The AMP8 target is approximately 300Ml/d. One of these measures is to limit the automatic availability of water for new non-domestic requests for water to a maximum of 0.05Ml/d (50m³/d) per request (reducing to 0.02Ml/d, 20m³/d, from April 2024). We will also apply additional constraints in smaller WRZs. We are accelerating the implementation of the demand management options designed to reduce non-household consumption, in liaison with our Retail partners. We expect that these measures will concentrate on leveraging smart meter data to identify continuous flow in the non-household sector and accelerate find and fix processes, reducing leakage. We are also trialling water efficiency visits in liaison with our Retail partners. We will monitor the efficacy of these options through our demand management monitoring framework and optimise them for WRMP29. And, where non-household demand exceeds our forecast, we will review this in the context of overall DI (to see if this is offset by greater household savings) and if necessary will implement further measures, including our adaptive planning options. We are confident that our limits on non-domestic demand, combined with our non-household demand management strategy will reduce demand and bring it in line with our WRMP24 forecast.	No	Revised draft WRMP24 Demand management preferred plan, Section 9
Issue 5: Best value options evidence					
5a	Defra	You were asked to include evidence that the timing and sizing of the strategic reservoir options represent best value.	We are pleased that the evidence we presented to support the timing and sizing of the strategic reservoir options is currently judged to be sufficient.	No	

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
		You have presented sufficient information in your revised draft WRMP24 and we are confident this is being addressed further as part of the RAPID Gated Process. The Environment Agency is undertaking a full and comprehensive assessment of the Response to Priority Action 1 for the Fens Reservoir and Lincolnshire Reservoir. This reflects the current view, but the Environment Agency reserves the right to form alternative positions subsequently following further information provided through the RAPID process. The company should continue to engage with RAPID to provide additional detail on the Fens Reservoir options selection and costings, as required. If costs substantially change, we would advise that Anglian Water reviews its options appraisal to ensure that it is still best value.	We continue to engage with RAPID and our individual regulators on the progress of option selection and costings.		
5b	Defra	You were asked (by Ofwat) to provide sufficient and convincing evidence that the number and range of options is appropriate given the presented scale of challenge, including at a zonal level. Some further evidence has been included in the plan, but Ofwat conclude this has not provided complete evidence that you have fully considered transfers from neighbouring companies and regions. You should provide a comprehensive account of options explored to transfer water from both Water Resources North (WReN) and Water Resources West (WRW), and why these have not resulted in best value options in your preferred plan.	Following publication of regional plans and revised draft WRMPs we have continued discussions with Severn Trent Water, Yorkshire Water and regional groups Water Resource West and Water Resource North to understand the latest supply demand balance position and opportunities for future transfers. At the start of the planning cycle, the transfer options from Severn Trent Water considered at WRMP19 were formally withdrawn by Severn Trent Water for consideration in our WRMP and the Water Resources East Regional Plan. The resources that would be required to enable the transfer options to AWS and WRE are needed to support Strategic Resource Options (SROs) in other regional groups. We have continued to liaise with Severn Trent Water and the position has not changed. Yorkshire Water has also confirmed that at present there is no surplus resource available to support transfers in the short or long term in their preferred scenario. The outcome of WINEP investigations will confirm the need for each company/region and will clarify if transfer options might then become available in the near term or in the longer term. The new Kielder SRO could increase the potential for transfers in the longer term and will be considered though the next cycle of the regional planning process. Once WINEP investigations are completed and the requirements of each company/regional group confirmed we will be able to formally cost and assess options as part of WRMP29.	No	Revised draft WRMP24 Decision making technical supporting document, Section 7

No.	Consultee	Summary of response	Our response	Change made	Where further information can be found
Issue 1: Protection and improvement of the environment					
			Our analysis shows how transfers from either WRW or WReN would impact our plan. If these transfers offer better value these could be used to reduce the capacity of desalination required from 2040 onwards. Any near term options could be used to deliver permanent licence caps to recent actual annual average sooner than we have planned or could be used regionally to support additional growth in the Cambridge Water area.		
5c	Defra	You were asked to ensure the benefits of your £482 million investment in interconnecting your network in the 2025-30 period are evidenced in the plan. Anglian Water has stated that the 237Ml/d benefits in the draft WRMP data table was calculated by summing the transfer capacity of the 10 individual interconnector schemes required by 2030. This does not directly address the recommendation. You should, in your final plan, ensure there is a clear explanation of what, if any, benefits each interconnector option attributes to the final planning WAFU and supply demand balance. Your plan must be clear where numbers refer to capacity only.	The investment required to interconnect our network between 2025-30 and the capacity Ml/d provided, can be found in our WRP Table 4: Options Appraisal Summary. The interconnector capacity provides the ability to transfer water from an area in surplus to one in deficit. The capacity provides a maximum constraint. The utilisation of interconnectors over the plan is determined by the supply demand balance and interactions with other new options. We have developed a series of graphics (see Annex One to help clarify the relationship between the WRMP19 and WRMP24 interconnectors. These graphics demonstrate how the interconnectors and new supply-side options work together over the planning period to provide WAFU benefit and satisfy the supply demand balance.	No	WRP Table 4

3.7 Annex One

Figure 2 2025- All licences capped to peak

Figure 3 2030- Time limited licences capped at recent actual annual average

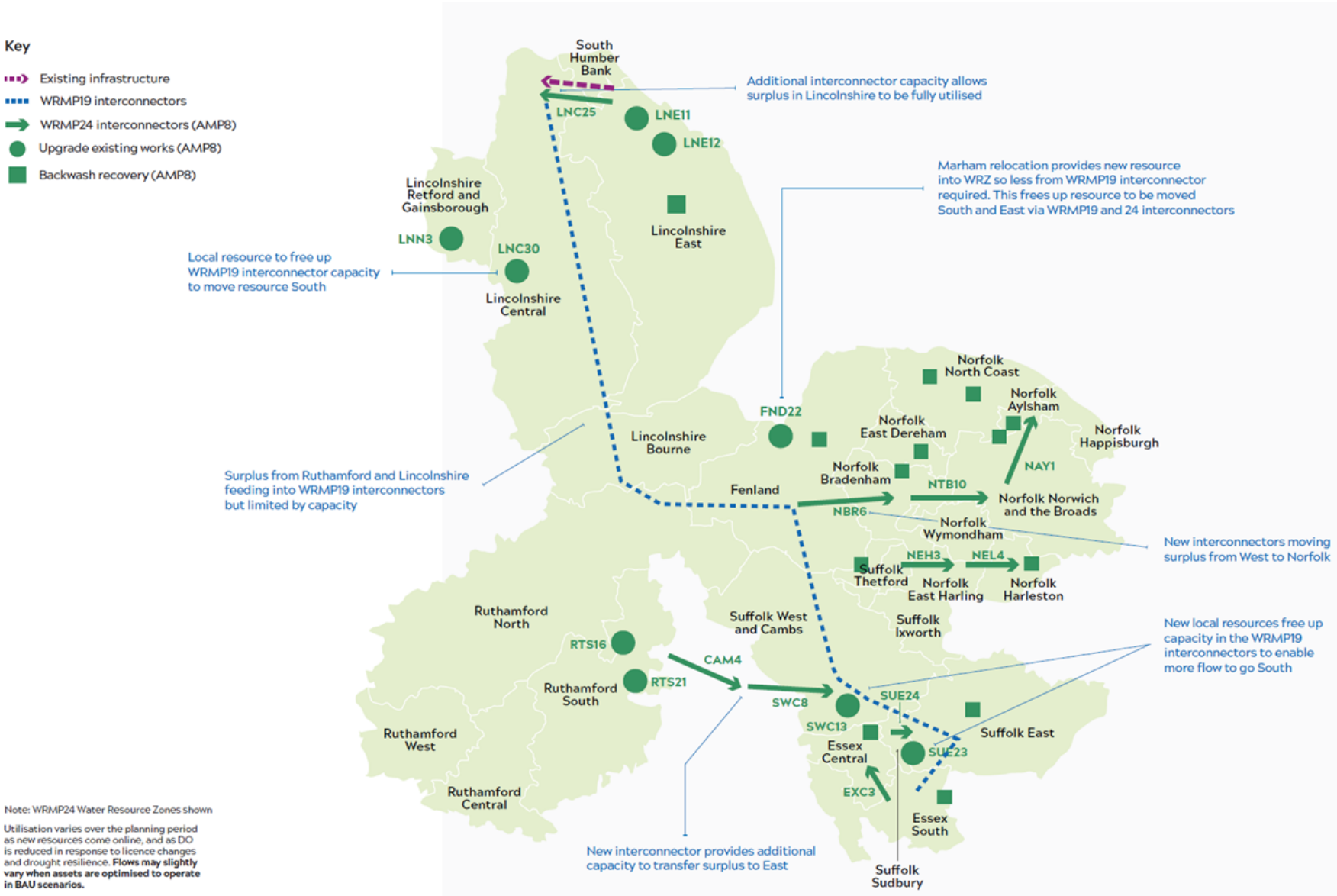
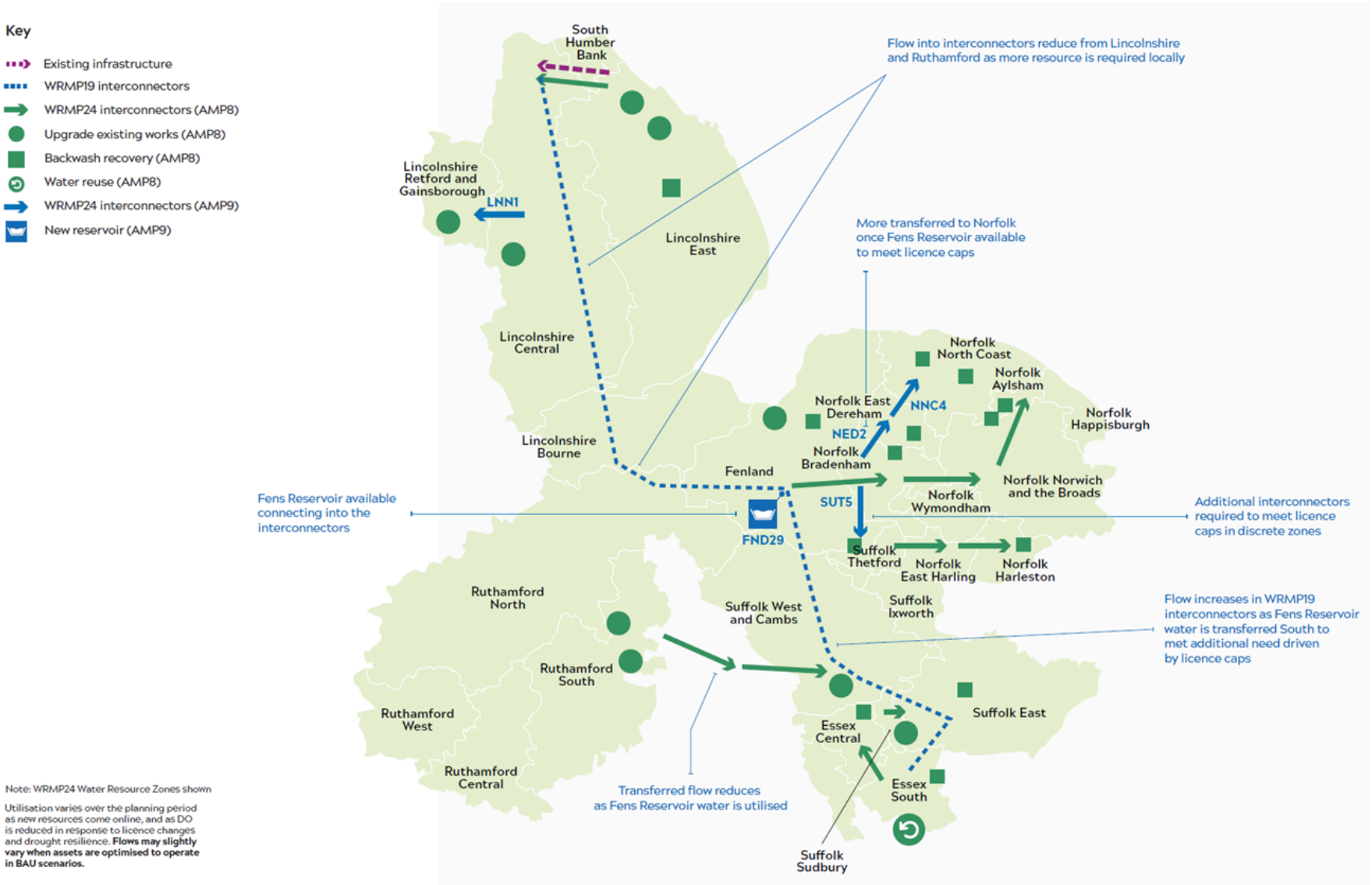


Figure 4 2032 - Some licence caps to recent actual annual

Note: WRMP24 Water Resource Zones shown

Utilisation varies over the planning period as new resources come online, and as DO is reduced in response to licence changes and drought resilience. **Flows may slightly vary when assets are optimised to operate in BAU scenarios.**

Figure 5 2036 - All remaining licences capped



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