

Section	WRPG ref.	Key compliance indicator	Compliant (Y/N)	Comments and updates
<b>2.1 The legal requirements</b>	S2.1, Page 3	You have considered and taken into account links between your WRMP and River Basin Management Plans.	Y	Link explained in the main plan narrative section 7.5.6 to 7.5.9
	S2.1, Page 3	You have considered and taken into account links between your WRMP and your Business Plan.	Y	Link explained in the main plan narrative section 7.5.2
	S2.1, Page 3	You have considered and taken into account links between your WRMP and your Drought Plan.	Y	Link explained in the main plan narrative section 7.5.4
	S2.1, Page 3	You have considered and accounted for links between your WRMP and the Environment Agency's drought plans and/or Natural Resources Wales' drought plans as appropriate.	Y	Link explained in the main plan narrative section 7.5.5
	S2.1, Page 3	You have considered and taken into account links between your WRMP and flood risk management plans.	Y	N/A
	S2.1, Page 3	You have considered and taken into account links between your WRMP and any local plans produced by Local Authorities.	Y	Link explained in the main plan narrative section 7.5.10
	S2.1, Page 3	You have considered and taken into account the requirements of the relevant legislation listed in section 2.1, including the WRMP Direction 2017 for water companies in England and WRMP (Wales) Directions 2016 for water companies in Wales.	Y	Explanation in our Addendum to the SoR section 4.1
<b>2.2 Early engagement with regulators, customers and interested parties</b>	S2.2, Page 4	You have followed the principles of UKWIR's 'Decision Making Process' and 'Risk Based Planning' frameworks to: <ul style="list-style-type: none"> <li>characterise the problem you need to solve</li> <li>choose the best decision making process for appraising the options available to you</li> <li>determine your approach for dealing with risks in your plan</li> <li>determine methods for supply, demand, outage and headroom calculations that are consistent with your chosen options appraisal method and risk composition.</li> </ul>	Y	Explained in the main plan narrative section 5.2 and Technical Reports 1.7 and 4.9
	S2.2, Page 4	You have prepared a method statement which clearly explains the choice and justification of methods, and communicated your statement to statutory consultees including the Environment Agency and/or Natural Resources Wales, Ofwat, licensed suppliers in your area that operate through your supply system any other relevant parties.	Y	Link explained in the main plan narrative Chapter 5 and Technical Report 4.9
	S2.2, Page 3	You have engaged with the Environment Agency and/or Natural Resources Wales to discuss the approaches laid out in your method statement and have appropriately recorded the outcomes of this engagement.	Y	Yes regular liaison with minuted meetings with EA
	S2.2, Page 3	You have engaged with your Board, customers and other parties to discuss the approaches laid out in your method statement. You have appropriately recorded and incorporated the outcomes of this engagement.	Y	Board engagement and assurance, explained in main plan narrative Chapter 8.
<b>2.3 Hold a pre-consultation</b>	S2.3, Page 5	You have held pre-consultation discussions with statutory consultees including the Environment Agency and/or Natural Resources Wales, Ofwat and licenced water suppliers that operate through your supply system, revising your proposed approach accordingly.	Y	Explained in the main plan narrative Chapter 2, Technical Report 7.1 and Statement of Response on draft WRMP
	S2.3, Page 5	You have accounted for outcomes of pre-consultation discussions with other consultees (including consumers, companies with which you share supply or have bulk supply) and have revised your proposed approach accordingly.	Y	Explained in the main plan narrative section 2.3, Technical Report 7.1 and Statement of Response on draft WRMP
	S2.3, Page 5	You have indicated how consultee feedback has been incorporated into the methods and approaches you will use to produce your draft plan.	Y	Explained in the main plan narrative section 2.4, Technical Report 7.1 and Statement of Response on draft WRMP
<b>2.4 Write a draft plan</b>	S2.4, Page 5	You have accounted for pre-consultation outcomes and followed any written Directions received from the Secretary of State and/or Welsh Ministers. For water companies in England, follow the WRMP Direction 2017. For water companies in Wales, follow the WRMP (Wales) Direction 2016.	Y	Explained in the main plan narrative section 1.5 and Chapter 2 and Statement of Response
	S2.4, Page 5	You have used a logical structured layout for your draft WRMP and included a separate non-technical overview, and supported the main technical document with appendices.	Y	Yes
<b>2.5 Send your draft plan</b>	S2.5, Page 5	You have appropriately flagged national security information or data within the draft WRMP, ready for redaction if necessary following security checking.	Y	The report does not contain any security information that requires redaction

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	S2.5, Page 5	You have flagged commercially confidential or sensitive information or data that you prefer should not be published.	Y	N/A
<b>2.6 Publish and distribute your draft plan</b>	S2.6, Page 6	You have not published your draft plan until instructed to do so by the Secretary of State or the Welsh Ministers and have followed the WRMP Regulations 2007 in making your plan publicly available.	Y	Yes
	S2.6, Page 6	You have redacted sensitive information prior to publication.	N/A	N/A
	S2.6, Page 6	You have prepared a statement for issue with the draft plan, which explains where commercially sensitive information has been redacted and clearly explains the process for making representations on the draft plan.	Y	Yes
	S2.6, Page 6	You have taken appropriate steps to advertise the publication of the plan and to explain its contents to key stakeholders at the start of or during the consultation period.	Y	Yes
<b>2.7 Carry out a public consultation on your draft plan</b>	S2.7, Page 6	You have allowed for a consultation period appropriate for the complexity of the plan, and that gives you adequate time to prepare a response to consultation feedback by the specified deadline (26 weeks after publication).	Y	Yes
<b>2.8 Publish a statement of response</b>	S2.8, Page 7	You prepared and published your statement of response by the specified deadline.	Y	Yes.
	S2.8, Page 7	You have considered all consultation responses in your statement and have explained whether/how you have acted on them and why.	Y	Explained in the main plan narrative section 2.4, Technical Report 7.1 and Statement of Response on draft WRMP
	S2.8, Page 7	You have set out any changes due to other factors during the consultation period (for example, external influences).	Y	Explained in the SoR and Addendum to the SoR and section 5.3 Table 18
	S2.8, Page 7	You have clearly set out the main changes you have made for the final plan and have accompanied your statement with an updated version of the draft plan if changes are substantive.	Y	See SoR and Addendum to the SoR
	S2.8, Page 7	You have notified any party that responded to the consultation as you publish the statement of response (and revised draft WRMP if necessary).	Y	Yes
	S2.8, Page 7	You have considered the impact of any changes to your draft WRMP that might affect your Drought Plan, Business Plan or other plans.	Y	Explained in the main plan narrative section 7.5
<b>2.9 Send your draft final plan</b>	S2.9, Page 7	You have submitted your statement of response and final draft plan (if different to the draft WRMP) to the Secretary of State or Welsh Ministers, repeating the checklist steps as given in Section 2.6. The final draft plan should take account of any additional works required by Defra or the Welsh Government or advised by the Environment Agency or Natural Resources Wales following your statement of response.	Y	Yes
	S2.9, Page 7	You have undertaken any additional works as required by the Environment Agency or Natural Resources Wales following their review of your final draft plan, and have fully checked all changes.	Y	Yes
	S2.9, Page 7	You have completed and submitted the WRMP tables alongside the final WRMP.	Y	Yes
<b>2.10 Publish your final plan</b>	S2.10, Page 7	You have accounted for any relevant Directions with regards to publishing your final plan and the appropriate permissions from the Secretary of State or Welsh Ministers have been given.	Y	Explained in the addendum to the SoR section 4.1
	S2.10, Page 7	You have notified any party that responded to the consultation as you publish the final plan.	Y	Yes
<b>2.11 Revise and review your final plan</b>	S2.11, Page 8	You have planned for annual review of the published plan in line with the Annual Review guidelines.	Y	Yes
	S2.11, Page 8	You will consult with the Environment Agency and/or Natural Resources Wales on any material changes that you wish to make to your plan in future.	Y	Yes
<b>3.1 Developing your plan</b>	S3.1, Page 9	Your plan consistently complies with relevant government policy documents/publications.	Y	Yes following WRP guidelines, guiding principles, WRMP Direction 2017
	S3.1, Page 9	You have provided a full explanation of the planning period assumed in the plan, which covers, as a minimum, the statutory period from 2020 to 2045.	Y	Included in the main plan extended to 2080 (60 year planning period) in line with regional modelling.
	S3.1, Page 9	You have included a robust forecast of the water you have available to supply customers with for each year within the planning period, accounting for climate change, and demonstrating that supply is both efficient and sustainable. You have achieved this by following the steps in Section 4 of this checklist.	Y	Yes, covered in the supply section of the rdWRMP main plan section 3.4 and DO methodology Technical Reports 1.1 and 1.1.1
	S3.1, Page 9	You have included a robust forecast of customers' demand for water during each year within the planning period, accounting for climate change. You have achieved this by following the steps in Section 5 of this checklist.	Y	Explained in the main plan narrative section 3.3 and Technical Report 2.7

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	S3.1, Page 9	You have allowed for uncertainties in your calculations and forecasts for both supply and demand over the planning period, and have used best practice methods to quantify uncertainty.	Y	Explained in the main plan narrative section 3.5 and Technical Report 3.2
	S3.1, Page 9	You have compared supply and demand to determine whether there is a surplus or deficit in any of your resource zones.	Y	Explained in the main plan narrative section 3.6.
	S3.1, Page 10	If you are in surplus in any of your resource zones you have flagged to other water companies that water is available for trading.	Y	Yes, explained in the main plan narrative chapters 4 and 7.
	S3.1, Page 9	If you are in deficit in any of your resource zones, you have considered all reasonable options for addressing the deficit, including options for increasing supplies, reducing demand and cross-company/third party options	Y	Explained in the main plan narrative Chapter 4 and Technical Reports 4.1 and 4.2
	S3.1, Page 10	Where new options are required, you have given opportunity for neighbouring companies or third parties to bid into your plan.	Y	Yes, explained in the main plan narrative section 7 and Technical Report 5.2
	S3.1, Page 10	You have adopted options that support the environmental objectives set out in RBMPs and if required, have carried out a Habitats Regulations Assessment including appropriate assessments, and a Strategic Environmental Assessment (SEA).	Y	Explained in the main plan narrative section 4.6 Technical Report 4.11, 4.11.1 and 4.12
	S3.1, Page 10	If you supply customers in Wales or your plan affects catchments in Wales, you have worked with Welsh Government and Natural Resources Wales with regards to understanding implications of the Environment (Wales) Act and Wellbeing of Future Generations (Wales) Act in developing your plan and how your plan contributes to Nature Recovery Plans.	N/A	N/A
	S3.1, Page 10	If you supply customers in England, you have adopted options that support the well-being of future generations, are compatible with Defra's long term plans for the environment including Biodiversity 2020, and whose social and environmental benefits/costs are properly understood and taken account of.	Y	Explained in the main plan narrative section 4.6 Technical Report 4.11, 4.11.1 and 4.12
	S3.1, Page 9	You have included confirmed or likely sustainability changes that you have been informed about.	Y	Explained in the main plan narrative section 3.4 and Technical Report 1.4
	S3.1, Page 9	You have demonstrated a system that can cope with droughts of a magnitude and duration that you reasonably expect to occur in your area over your chosen planning period and have considered contingencies for challenging but plausible droughts beyond the capabilities of your supply system (with relevant links to your Drought Plan) including whether they require options to provide additional resilience.	Y	Explained in the main plan narrative section 5.7 (particularly 5.7.12) and Technical Report 1.1.1
	S3.1, Page 9	You have documented the impact of drought interventions on supply and demand and links with your Drought Plan.	Y	Explained in the main plan narrative section 6.10 and Technical Report 1.1.1
	S3.1, Page 10	You have accounted for the views of customers, other interested parties, statutory and non-statutory consultees in developing your plan.	Y	Explained in the main plan narrative chapters 2, 5 and 6 and Technical Report 7.1 and the SoR on our dWRMP.
	S3.1, Page 10	You have produced a flexible and adaptive plan that allows for risks and uncertainties in decisions, calculations and forecasts undertaken as part of the development of the plan.	Y	Explained in the main plan narrative Chapters 5 and 6 and Technical Report 4.9
	S3.1, Page 10	You have gained Board buy-in with respect to the cost and long-term sustainability of proposals.	Y	Explained in the main plan narrative Chapter 8.
	S3.1, Page 9	You have provided all the necessary supporting information at WRZ level and entered this in the water resources planning tables.	Y	Yes
<b>3.2 Defining a water resource zone</b>	S3.2, Page 10	You have defined your Water Resource Zones (WRZs) using the Environment Agency's WRZ assessment methods (Water Resource Zone Integrity, 2016).	Y	Yes, see Technical Report 1.5
	S3.2, Page 10	You have demonstrated that, for each WRZ: <ul style="list-style-type: none"> <li>the abstraction and distribution of supply is largely self-contained (excepting agreed bulk transfers).</li> <li>the majority of customers experience the same risk of supply failure and same level of service for demand restrictions.</li> </ul> You have explained and justified any deviations from the above.	Y	Yes, see Technical Report 1.5

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<b>3.3 Problem characterisation</b>	S3.3, Page 10	You have applied the problem characterisation step of the WRMP 2019 Methods – Decision Making Process: Guidance (UKWIR, 2016) to determine the nature of the planning problem (including scale and complexity) as well as related issues, risks and uncertainties.	Y	Explained in the main plan narrative section 5.2 and Technical Report 1.7
	S3.3, Page 11	You have demonstrated that the effort and cost you have given to the selection of a decision-making process is proportional to the problem. You have described the significance of the choice of decision making method and its wider implications with respect to the plan outcomes.	Y	Explained in Technical Report 4.9
	S3.3, Page 11	You have adopted processes outlined in WRMP 2019 Methods – Decision Making Process: Guidance (UKWIR, 2016) using methods that are most appropriate for your company.	Y	Explained in Technical Report 4.9
	S3.3, Page 11	You have explained how/why the solutions(s) you have identified have been arrived at, and given assurance that uncertainties have not been double counted.	Y	Explained in main report Chapter 5 and Technical Report 4.9
	S3.3, Page 11	You have applied the Economics of Balancing Supply and Demand [EBS] method (UKWIR, 2002) to determine a benchmark solution for comparison.	Y	Explained in Technical Report 4.9
<b>3.4 Drought risk assessment</b>	S3.4, Page 11	You have explained how you have followed the processes outlined in WRMP 2019 Methods – Risk Based Planning: Guidance (UKWIR, 2016) to identify an appropriate design drought.	Y	Explained in Technical Report 1.1
	S3.4, Page 11	You have clearly set out and justified the risk composition you have selected for each WRZ and the reasons that lead you to select that option, including the availability of data where more complex risk compositions have been used.	Y	Explained in the main plan narrative section 5.2 and Technical Report 1.7. At a company region level rather than WRZ level.
	S3.4, Page 11	Where different risk compositions are used in different parts of your supply system, you have explained this clearly and justified your reasoning. Also, where a more complex risk composition has been adopted but later abandoned to a simpler approach, this has been noted but your WRMP reflects the final risk composition adopted.	Y	Explained in the main plan narrative sections 5.2 and 5.3 and Technical Report 4.9
	S3.4, Page 11	You have included a drought resilience statement in your plan which is consistent with your chosen risk composition, and have explained how this reflects the hydrological risks that drought may impose on your supply system.	Y	Explained in main report section 6.10 and Technical Report 1.1.1
<b>3.5 Planning scenarios</b>	S3.5, Page 12	You have demonstrated that your plan is based on the dry year annual average for demand.	Y	Explained in main report Section 3.3.
	S3.5, Page 12	You have reiterated the design drought you are basing your plan on for supply, and have based this on the drought risk assessment activities carried out under Section 3.4.	Y	Explained in main report section 3.4 and in Technical Report 1.1
	S3.5, Page 12	If you have chosen to consider how you will deal with a period of peak strain (critical period), you have set out which WRZs this applies to, the reasons for this and have described the underlying factors that impact on the supply-demand balance during the critical period.	Y	Explained in main report Section 6 and Technical Report 2.5
	S3.5, Page 12	You have explained the assumptions made when assessing your baseline figures for your demand forecast. Your documentation includes assumptions about mains renewal and capital maintenance, your baseline forecast of consumer need, losses through leakage and operating losses. You have demonstrated that the baseline case represents what happens excluding any changes in operations or company policy.	Y	Explained in main report Chapter 3
	S3.5, Page 12	You have described how/where you have allowed for uncertainty in your demand forecast and how this is appropriate to your selected methods.	Y	Explained in main report Section 3.5 and Technical Report 3.2
	S3.5, Page 12	You have explained the assumptions made when assessing baseline figures for your supply forecast. You have demonstrated that the baseline case represents the supplies that can be maintained through a design drought as appropriate for your company area.	Y	Explained in main report Section 3.4 and Technical Report 1.1 and 1.1.1
	S3.5, Page 12	You have reported the baseline figures for supply and demand in the water resources planning tables at WRZ level.	Y	Yes in WRP Tables
	S3.5, Page 12	For your final plan, you have explained any decisions related to developing options to manage or meet the forecast demand of your customers.	Y	Explained in main report Chapter 5 and Technical Report 4.9

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	S3.5, Page 12	You have documented each of the demand side options considered and the reason for choosing each option. If relevant, you have categorised your options as – change to existing policies, operations, infrastructure and resilience solutions (including drought measures and orders).	Y	Explained in main report Section 4.2 and Technical Report 4.2, 4.7 and 4.9
	S3.5, Page 12	You have considered all available demand and supply side options in the process of developing your preferred plan. You have explained how you have done this, and demonstrated how third party and collaborative options with other companies have been evaluated. You have accounted for opportunities to improve resilience at regional level.	Y	Explained in main report Chapter 4 and Technical Reports 4.1 to 4.9 and 5.1 and 5.2
	S3.5, Page 12	You have provided details of and explained your preferred programme of solutions to restore your supply-demand balance under a dry year average annual scenario.	Y	Explained in main report Chapter 6.
	S3.5, Page 12	You have provided details of and explained your preferred programme of solutions to restore your supply-demand balance under a critical period scenario, if relevant.	Y	Explained in main report Chapter 6.
	S3.5, Page 12	Where you are in deficit in dry year average annual or critical period scenarios, you have demonstrated how you have addressed these deficits and how your plan allows you to be compliant with your statutory duties.	Y	Explained in main report Chapter 6.
	S3.5, Page 12	You have indicated clearly if you have included resilience solutions for more challenging but plausible droughts beyond the capabilities of your final plan.	Y	Explained in main report section 5.7
	S3.5, Page 12	If you are in surplus, and you have still decided to include options in your plan, you have explained the benefits from this (such as more efficient supply of water, improvements in long-term resilience, demand reduction etc.)	Y	Applies to our East region only section 6.6
<b>3.6 Levels of service</b>	S3.6, Page 13	For water companies wholly or mainly in England you have clearly set out your level of service as an annual percentage risk of restrictions, and set out if/how you expect it to change across the planning period as you implement supply-demand or resilience measures.	Y	Explained in main report Section 6.10
	S3.6, Page 13	You have presented evidence to demonstrate that your level of service is appropriate and have used appropriate assumptions and methodologies to develop your levels of service.	Y	Explained in main report Section 6.10
	S3.6, Page 13	You have engaged with your customers and stakeholders and their views have been considered when developing your level of service. You have communicated your level of service appropriately.	Y	Explained in main report Section 6.10 and Technical Report 7.1
	S3.6, Page 13	For water companies in England, you have set out a reference level of service that would mean resilience to an event of approximately 0.5% risk of annual occurrence (1:200 year drought event). You have presented this as a scenario and explained how you have modelled the drought event used.	Y	Explained in main report Sections 5.3 and 5.4
	S3.6, Page 13	You have quantified the deployable output and incremental costs of your reference level of service scenario and explained how you have calculated these. You have set out if and how this could be achieved at any point in the planning period.	Y	Explained in main report Section 3.4 and Chapter 6
<b>4.1 How to develop your supply forecast</b>	S4.1, Page 14	Your approach to calculating your supply forecast is consistent with your risk composition choice, and the risk and uncertainty involved have been quantified using appropriate methods.	Y	Explained in main report Section 3.4 and Technical Report 1.1 and 1.1.1
	S4.1, Page 14	You have discussed your approach to calculating your supply forecast as early as possible with the Environment Agency or Natural Resources Wales.	Y	Explained in main report Section 3.4 and Technical Report 1.1 and 1.1.1 and discussions minuted
	S4.1, Pages 14-15	You have considered all individual components making up the supply forecast, and taken account of pressures on future supplies including (but not limited to): <ul style="list-style-type: none"> <li>• climate change</li> <li>• abstraction licence changes due to abstraction reform or sustainability improvements</li> <li>• pollution or contamination implication for sources</li> <li>• development and new infrastructure</li> <li>• changes in contractual arrangements relating to transfers.</li> </ul> You have clearly documented all assumptions made.	Y	Explained in main report Section 3.4 and Technical Reports 1.1, 1.1.1, 1.2, 1.3, 1.4 and 1.6
	S4.1, Page 14	You have recorded in the water resources planning tables the quantities for all baseline supply components as well as the amount of water that your analysis indicates you can reliably supply.	Y	Yes in WRP tables

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	S4.1, Page 14	As part of your supply assessment, you have determined and explained how your supply system behaves during the design drought.	Y	Explained in main report Section 3.2 and Technical Report 1.1 and 1.1.1
	S4.1, Page 14	You have explained links between your WRMP and your drought plan, including the likelihood of achieving planned levels of service and their impact on available supply.	Y	Explained in Technical Report 1.1.2
	S4.1, Page 14	You have explained how drought interventions (drought permits and orders) that are contained within the drought plan have been dealt with in the WRMP in accordance with levels of service, and outlined any contingencies for extreme droughts that exceed the capability of your system to meet.	Y	Explained in main report Section 3.4.10 Table 4 and section 6.10
	S4.1, Page 14	For water companies in England you have not included benefits drawn from supply drought measures (e.g. drought permits and orders) in your baseline supply forecast.	Y	Explained in main report Section 3.4.10 Table 4 and section 6.10
	S4.1, Page 14	For water companies wholly or mainly in Wales, you should have discussed inclusion of supply drought measures in baseline forecasts with Natural Resources Wales or Environment Agency.	N/A	N/A
<b>4.2 What should be included in your water supply forecast?</b>	S4.2, Page 15	You have provided a breakdown of your supply forecast for the dry year annual average scenario for all WRZs and presented this in the planning tables.	Y	Explained in main report Section 3.4 Table 5 by region and Technical Report 1.1 by WRZ and WRP Tables
	S4.2, Page 15	You have explained your decision to include a critical period, if relevant, and have provided a supply forecast for it.	Y	Explained in main report Section 3.4 Technical Report 1.1
	S4.2, Page 15	Where you abstract water for supply, your supply forecast for that WRZ sets out the deployable output, future changes to deployable output (e.g. from sustainability changes or climate change), transfers and future inputs from third parties, outage and other short-term losses, operational losses related to abstraction or treatments.	Y	Explained in main report Section 3.4 Technical Report 1.1, 1.2, 1.3, 1.4, 1.5
	S4.2, Page 15	Where you receive a raw or treated water import from a third party, your supply forecast reflects the contractual arrangements with this third party supplier.	Y	Explained in main report Section 3.4 Table 6
	S4.2, Page 15	You have demonstrated that your supplier will be able to maintain supply during your design drought and that levels of service can be achieved. You have demonstrated that your supplier has assessed that their statutory and policy obligations can be met.	Y	Explained in main report Section 6.9
	S4.2, Page 15	You have expressed the supply forecast as the Water Available for Use (WAFU).	Y	Explained in main report Section 3.6, paragraph 3.6.2
<b>4.3 What should be covered in your deployable output assessment?</b>	S4.3, Page 15	You have explained which factors constrain deployable output, such as hydrological yield, licensed quantities/constraints, pumping constraints, transfer issues, water quality and treatment.	Y	Explained in main report section 3.4 and Technical Report 1.1
	S4.3, Page 15	You have identified where deployable output is constrained by licences that are time limited and due to expire in the period covered by the plan, and evaluated the risks of non-renewal.	Y	Each time limited licence is assessed on a case by case basis. We are in close collaboration with the EA and plan well ahead if notification is given on a time limited licence.
	S4.3, Page 15	You have checked that licenced volumes are sustainable and that their use will not cause deterioration.	Y	Explained in Technical Report 1.1 and 1.1.1
	S4.3, Page 16	Your method for deployable output determination is consistent with your risk composition and the methods outlined in Handbook of source yield methodologies (UKWIR, 2014) or WRMP 2019 Methods – Risk Based Planning: Guidance (UKWIR, 2016); you have fully explained and documented your choice of method and supporting techniques.	Y	Explained in Technical Report 1.1 and 1.1.1
	S4.3, Page 15	You have described how deployable output will be affected by demand side drought restrictions according to the level of service you have planned for.	Y	Explained in main report Section 3.3 paragraph 3.3.19
<b>4.4 Your role in achieving sustainable abstraction</b>	S4.4. Page 16	Your proposals support WFD obligations and RBMP objectives in relation to sustainable abstraction.	Y	Explained in main report Section 3.4.22 to 3.4.31 and Technical Report 1.4
	S4.4. Page 16	You have determined if changes to your abstractions are required to meet RBMP objectives, and you have discussed the scope of changes with the Environment Agency or Natural Resources Wales as part of WINEP for PR19.	Y	Explained in main report Section 3.4.22 to 3.4.31 and Technical Report 1.4

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	S4.4. Page 16	You have determined that all existing abstractions (including any planned increases to abstracted volumes with current licence limits, and any time limited licences) are compliant with RBMP objectives and any other legally binding environmental objectives.	Y	Explained in main report Section 3.4.22 to 3.4.31 and Technical Report 1.4
	S4.4. Page 16	You have liaised with Environment Agency and/or Natural Resources Wales to determine if you have any abstractions from water bodies that are at risk from deterioration.	Y	Explained in main report Section 3.4.22 to 3.4.31 and Technical Report 1.4
	S4.4. Page 16	You have reviewed potential mitigation measures for any waterbodies at risk and put into place plans to manage the risk of deterioration, or where deterioration has occurred because of your actions, you have put in place plans to restore the waterbody.	Y	Explained in main report Section 3.4.22 to 3.4.31 and Technical Report 1.4
	S4.4. Page 16	You have completed all investigations and options appraisals in your PR14 water industry NEP for AMP6 by the agreed dates and included any options needed to manage any sustainability changes in your plan.	Y	Explained in main report Section 3.4.22 to 3.4.31 and Technical Report 1.4 and 1.4.1
	S4.4. Page 16	You have considered any regulator measures to improve fish/eel passage or water quality and accounted for likely impact on supply forecasts.	Y	Explained in main report Section 3.4.22 to 3.4.31 and Technical Report 1.4
<b>4.5 Invasive Non-Native Species (INNS)</b>	S4.5. Page 17	You have considered whether/how any current or future abstractions or operations might cause the spread of INNS and have determined measures to reduce the risk of this. You have liaised with Environment Agency and/or Natural Resources Wales to discuss the risk of INNS and reflected the outcomes of this in your plan.	Y	Explained in Technical Report 4.11
	S4.5. Page 17	For water companies in England, you have reflected the February 2017 position statement and its principles in your plan.	Y	Explained in Technical Report 4.13
<b>4.6 How to include changes to your abstraction licence in your plan</b>	S4.6. Page 17	You have liaised with the Environment Agency or Natural Resources Wales to determine the likely impact of sustainability measures on abstraction licences and agreed a mutually acceptable timescale for the implementation of new licence conditions.	Y	Explained in main report Section 3.4.22 to 3.4.31 and Technical Report 1.4
	S4.6. Page 17	You have determined the impact of any sustainability reductions on your deployable output and included these in your plan appropriately.	Y	Explained in main report Section 3.4, 3.6 and Technical Report 1.4
	S4.6. Page 17	You have assessed the impact of possible future sustainability changes on your plan through scenario testing and not included any uncertainty about sustainability changes within your plan.	Y	Explained in main report Chapter 5 (particularly 5.7 - Testing the Plan) and Technical Report 1.4
	S4.6. Page 17	Where changes to abstraction licences or new options threaten security of supply and there are no alternatives, you have considered and prepared evidence for exemption under Article 4.7 of the WFD.	N/A	N/A
<b>4.7 Abstraction reform – evidence needs</b>	S4.7, Page 17	For catchments managed by the Environment Agency, you have not included any changes to DO from abstraction reform. You have identified sources having unused licence volumes that are required for emergency purposes and have explained how you define these (e.g. drought source or other purposes).	Y	Explained in Technical Report 1.1
	S4.7, Page 17	For catchments managed by Natural Resources Wales, you have included evidence to justify retaining any of your daily or annual licensed volumes within your plan. You have discussed the evidence requirements with Natural Resources Wales.	N/A	N/A
	S4.7, Page 17	If you operate using licences within the three cross-border catchments (Rivers Dee, Wye and Severn), you have included information in your plan that justifies retention of any unused volumes associated with those licences.	N/A	N/A
<b>4.8 Climate change</b>	S4.8, Page 18	You have determined the impact of climate change on river flows and groundwater recharge using one of the three methods set out in the guideline.	Y	Explained in main report Section 3.4.32 to 3.4.35 and Technical Report 1.1
	S4.8, Page 19	You have assessed and clearly demonstrated the vulnerability and risks your sources and supplies face for each of your WRZs.	Y	Explained in main report Section 3.4 and Technical Report 1.1, 1.2 and 1.3
	S4.8, Page 19	You have set out and justified your assessment methods, outlined any assumptions made and clearly presented your results, explaining any differences in methodology between your resource zones.	Y	Explained in main report Section 3.4 and Technical Report 1.1, 1.2 and 1.3
	S4.8, Page 19	You have clearly explained whether and how climate change has been accounted for in your headroom assessment and have reported this separately.	Y	Explained in Technical Report 3.2

Section	WRPG ref.	Key compliance indicator	Compliant (Y/N)	Comments and updates
	S4.8, Page 19	You have set out if/how you have used scaling methods to account for climate change that has already happened, and how this has affected your supplies.	Y	Explained in main report Section 3.4.32 to 3.4.35 and Technical Report 1.1
	S4.8, Page 19	You have calculated the impacts of climate change on supply and have entered this into the water resources planning tables as changes to DO.	Y	Yes in WRP tables
<b>4.9 Water transfers</b>	S4.9, Page 18	You have quantified all water transfers including all raw and potable imports/exports and entered this in the water resources planning tables. You have noted the direction of transfers along with the potential to change the direction if needed.	Y	Yes in WRP tables
	S4.9, Page 18	You have documented agreed limits between supplier and recipient companies for all transfers, including any contractual variations that might apply (e.g. in times of drought).	Y	Explained in main report Section 3.4.14 to 3.4.21 and Technical Report 5.2
	S4.9, Page 18	You have documented the total volume available to you via transfer for each year of your plan (accounting for operational or infrastructure constraints that may reduce quantities).	y	Yes in WRP tables
	S4.9, Page 18	You have assessed and documented the quality of transferred water and any impact of the transfer on the quality of receiving waters.	Y	Explained in main report Section 3.4.57
<b>4.10 Drinking water quality</b>	S4.10, Page 20	You have supported objectives for drinking water in protected areas.	Y	Explained in main report Section 3.4.47 to 3.4.59
	S4.10, Page 20	You have checked that the drinking water arising from the water treatment regime applied meets the Standards of the Drinking Water Directive plus any other legislation.	Y	Explained in main report Section 3.4.47 to 3.4.59
	S4.10, Page 20	You have abided by Section 68(1) of the Water Industry Act 1991 in terms of quality of supplied water, and applied this to water from your own sources as well as transfers.	Y	Explained in main report Section 3.4.47 to 3.4.59
	S4.10, Page 20	You have considered appropriate measures to prevent deterioration of water quality in a protected area.	Y	Explained in main report Section 3.4.47 to 3.4.59
	S4.10, Page 20	You have recorded how you have calculated treatment works losses and operational use for each WRZ.	Y	Explained in main report Section 3.4.42 to 3.4.46
	S4.10, Page 20	You have provided diagrams and other supporting evidence for complex major works that can be used in pre-consultation discussions with the Environment Agency or Natural Resources Wales.	Y	We can provide these if required.
	S4.10, Page 20	You have considered options to reduce losses where possible, especially if your plan has a supply-demand balance deficit.	Y	Explained in main report Section 3.4.46
	S4.10, Page 20	You have considered measures to protect supplies against long term risks of pollution.	Y	Explained in main report Section 3.4.42 to 3.4.46
	S4.10, Page 20	You have considered measures to reduce the treatment process whilst still complying with the requirements of the drinking water regulations.	Y	Explained in main report Section 3.4.46
	S4.10, Page 20	You have demonstrated that all sources you may rely on have been correctly identified and measures taken to provide protection where necessary, e.g. SPZs around groundwater abstractions.	Y	Explained in main report Section 3.4.42 to 3.4.46
	S4.10, Page 20	You have applied your approach consistently across all WRZs.	Y	Explained in main report Section 3.4.42 to 3.4.46
<b>4.11 Outage</b>	S4.11, Page 20	You have documented your outage allowance and your approach is in line with WRMP 19 methods -Risk based planning (UKWIR, 2016) or the Outage allowances (UKWIR 1995) approach.	Y	Explained in main report Section 3.4.36 to 3.4.41 and Technical Report 3.1
	S4.11, Page 20	You have entered outage calculations in the water resources planning tables.	Y	Yes in WRP tables
	S4.11, Page 20	You have included details of options you propose for reducing outage, particularly in cases of a supply-demand balance deficit.	Y	Explained in main report Section 3.4.41
<b>4.12 Water available for use</b>	S4.12, Page 20	You have clearly set out the total WAFU, and demonstrated how changes in deployable output, transfers, operational use and outage impact on the calculated total.	Y	Explained in main report Section 3.6
<b>5.1 What should be covered in your demand forecast</b>	S5.1, Page 21	You have provided a demand forecast for the dry year annual average where demand is unrestricted, which includes adjustments for likely future changes in demand due to factors such as climate change, population growth, household size, property numbers, and current company demand management policy/activity.	Y	Explained in main report Section 3.3 and Technical Report 2.7 (additional detail in Technical reports 2.1 to 2.6)



Section	WRPG ref.	Key compliance indicator	Compliant (Y/N)	Comments and updates
	S5.1, Page 21	You have provided a demand forecast for the critical period (if considered in your plan) that accounts for the factors you expect will drive demand during the critical period, such as seasonal changes or population growth.	Y	Explained in main report Section 3.3 (3.3.16 to 3.3.19) and Technical Reports 2.5 and 2.7
	S5.1, Page 21	You have provided a demand forecast for the final plan dry year annual average which includes adjustments to reflect solutions identified through your options appraisal.	Y	Explained in main report Section 6.9
	S5.1, Page 22	You have provided a demand forecast for the final plan critical period which includes adjustments to reflect solutions identified through your options appraisal.	Y	Explained in main report Section 6.9
	S5.1, Page 22	You have explained how demand forecasts have been arrived at and documented any underlying assumptions, including how you have determined unrestricted demand.	Y	Explained in main report Section 3.3 and Technical Report 2.7 (additional detail in Technical reports 2.1 to 2.6)
<b>5.2 Forecast household demand</b>	S5.2, Page 22	You have explained your reconciliation of current best estimates of demand with other parts of the water balance.	Y	Explained in main report Section 3.3 Technical Report 2.7 (additional detail in Technical reports 2.1 to 2.6)
	S5.2, Page 22	You have demonstrated how you have arrived at your forecast of population and property numbers and the assumptions on which these are based.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.2, Page 22	You have demonstrated an understanding of what is driving future household demand and how you have estimated this.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.5, Page 22	You have included forecast savings data for existing water efficiency initiatives in your baseline forecast.	Y	Explained in Technical Report 2.7
<b>5.3 Forecast population, properties and occupancy</b>	S5.3, Page 22	For water companies supplying customers in England you have aligned your method for forecasting population and property growth with the most recent local plans published for your area(s), and accounted for potential changes in published figures if a local plan is not yet finalised.	Y	Explained in main report Section 3.3.23 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.3, Page 22	Where no local plan project(s) exist to inform your plan, you have used other appropriate methods such as household projections for Dept. for Communities, Local Government, those produced for DCLG by the ONS or the methods outlined in Population, household property and occupancy forecasting (UKWIR, 2016). You have documented and explained assumptions and data sources used.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.3, Page 22	You have provided evidenced justification if your property forecasts deviate from planned figures.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.3, Page 23	You have accounted for the planning period in your forecast property and population figures and have explained where/if different forecasting methods are applied for different time horizons, especially if your planning period is longer than 25 years.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.3, Page 23	For companies supplying customers in Wales, you have based your forecast population and property figures on the latest Local Authority population and property projections published by the Welsh Government. Your analysis of the uncertainties in your forecast population and property figures has been informed by local development plans in your supply area.	N/A	N/A
	S5.3, Page 23	You have demonstrated that your plan does not constrain supply such that it may not meet planned property forecasts.	Y	Explained in main report Section 6.9
	S5.3, Page 23	You have engaged with local planning authorities to inform your analysis and understand uncertainties in your forecast population and property figures.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.3, Page 23	You have properly communicated limitations in your forecast and uncertainty associated with your forecast.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.3, Page 23	You have described assumptions and supporting information that you have used to develop property and occupancy forecasts, including uncertainties.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.3, Page 23	You have explained how you have allocated unaccounted for populations for each WRZ, including your assumptions.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
	S5.3, Page 23	You have accounted for local council and neighbourhood plans, when calculating future demand.	Y	Explained in main report Section 3.3.21 to 3.3.31 and Technical Report 2.3 and 2.3.1
<b>5.4 Forecasting customers' demand for water</b>	S5.4, Page 23	You have selected a method for forecasting demand that is appropriate to each WRZ, based on the supply-demand situation, any problem characterisation approaches you have considered and the data available.	Y	Explained in main report Section 3.3 and Technical Reports 1.7 and 2.7

Section	WRPG ref.	Key compliance indicator	Compliant (Y/N)	Comments and updates
	S5.4, Page 23	Your method for forecasting demand is aligned with the following guidelines: <ul style="list-style-type: none"> <li>• WRMP-19 Household demand forecasting - Integration of behavioural change into demand forecasting and water efficiency practices (UKWIR 2016).</li> <li>• Customer behaviour and water use – good practice for household consumption forecasting (UKWIR, 2012).</li> </ul>	Y	Explained in main report Section 3.3 and Technical Report 2.7
	S5.4, Page 23	You have documented your reasons for choice of method, including your assumptions and their associated uncertainties.	Y	Explained in main report Section 3.3 and Technical Reports 1.7 and 4.9
	S5.4, Page 23	You have demonstrated a forecast demand for the critical period scenario (if appropriate) as well as the dry year annual average.	Y	Explained in main report Section 3.3, 3.6 and Technical Report 2.7
	S5.4, Page 23	You have provided a breakdown of total consumption, per capita consumption and micro-components within the water resources planning tables.	Y	Yes in WRP tables
<b>5.5 Forecasting your non-household consumption</b>	S5.5, Page 23	You have calculated a demand forecast for non-households.	Y	Explained in main report Section 3.3.32 to 3.3.37, and Technical Reports 2.4 and 2.7
	S5.5, Page 24	You have described your assumptions about customer/property types that you have considered as non-household and demonstrated that your decisions are aligned with part 17C of the Water Industry Act 1991 and guidance on non-household customers as reported in Eligibility guidance on whether non-household customers in England and Wales are eligible to switch their retailer. You have consulted with retailers of water to non-household customers.	Y	Explained in main report Section 3.3.32 to 3.3.37, and Technical Reports 2.4 and 2.7
	S5.5, Page 24	You have accounted for the likely other retailers to non-household sectors in your area following the changes introduced in April 2017 and have consulted with retailers of water to non-household customers.	Y	Explained in main report Section 3.3.32 to 3.3.37, and Technical Reports 2.4 and 2.7
	S5.5, Page 24	You have determined non-household demand into different economic sectors, for example by using the UK SIC codes or applying a service and non-service split approach.	Y	Explained in main report Section 3.3.32 to 3.3.37, and Technical Reports 2.4
	S5.5, Page 24	You have assessed the likely new uptake of public water from non-household customers / sectors that previously used private supplies.	Y	Explained in main report Section 3.3.32 to 3.3.37, and Technical Reports 2.4 and 2.7
	S5.5, Page 24	You have examined and taken account of planned or existing water saving initiatives by both the wholesaler and retailer and have determined in the likely saving in non-household demand.	Y	Explained in main report Section 3.3.32 to 3.3.37, and Technical Reports 2.4 and 2.7
	S5.5, Page 24	You have included forecast savings data for existing water efficiency initiatives in the baseline forecast that you have presented.	Y	Explained in main report Section 3.3 and Technical Report 2.7
	<b>5.6 Forecasting leakage</b>	S5.6, Page 24	You have determined baseline leakage over the planning period and explained your method in the WRMP	Y
S5.6, Page 24		You have used UKWIR Consistency of reporting performance measures (2017) to forecast levels of leakage.	Y	Explained in main report Sections 3.3.38 to 3.3.39 and Technical Reports 4.8 and 4.8.1
S5.6, Page 24		If you are unable to use the guidance outlined in Consistency of Reporting Performance Measures (UKWIR 2017), you have explained why you have not used the revised approach for base year leakage, what steps you are taking to comply with the new approach and when this data will be available.	Y	Explained in main report Section 3.3.38 and 3.3.39
S5.6, Page 25		Where the revised approach to calculating base year leakage leads to uncertainty or significant changes in your base year or projected leakage, you have used scenarios to demonstrate how this affects your plan and any options you have selected.	Y	Explained in main report Section 3.3.38 and 3.3.39
S5.6, Page 25		You have described how your approach to calculating base year leakage affects your ability to meet government aspirations to reduce leakage over the planning period.	Y	Explained in main report Section 3.3.38 and 3.3.39
S5.6, Page 25		You have accounted for any actions or policies that may reduce leakage (e.g. mains improvements) in your leakage forecast.	Y	Explained in main report Section 3.3.38 and 39 and Technical Reports 4.8 and 4.8.1
S5.6, Page 25		You have accounted for your customers' views on leakage reduction and their resulting willingness to participate in demand management activities.	Y	Explained in main report Section 3.3 and Technical Report 7.1
S5.6, Page 25		You have included all feasible options for further leakage control, and any other options you are actively investigating with support from your customers.	Y	Explained in main report section 4.4 and Technical Reports 4.8 and 4.8.1

Section	WRPG ref.	Key compliance indicator	Compliant (Y/N)	Comments and updates
<b>5.7 Other components of demand</b>	S5.7, Page 25	You have included details on other components of demand, the methods you have adopted for their calculation and your source datasets.	Y	Explained in main report Section 3.3 and Technical Reports 2.7
<b>5.8 Metering</b>	S5.8, Page 25	You have reported household metering figures in the water resources planning tables.	Y	Yes in WRP tables
	S5.8, Page 25	For water companies in England, you have complied with the WRMP Direction 2017 with regard to household metering.	Y	Explained the Addendum to our Statement of Response, section 4.1
	S5.8, Page 25	If you are in an area of serious water stress, you have considered the costs and benefits of compulsory metering.	Y	Explained in Technical Report 2.6
	S5.8, Page 25	You have assessed which tariffs are appropriate to your company as part of your options appraisal and included in your plan as appropriate.	Y	Explained in Technical Report 4.2
<b>5.9 Impacts of climate change</b>	S5.9, Page 26	You have documented the allowance included in your plan for the impact of climate change on demand, including the assumptions on which this is based.	Y	Explained in Technical Report 1.2 and 2.7
	S5.9, Page 26	If your allowance is outside expected impact range (<3%), you have robustly demonstrated and justified the reasons for this.	N/A	N/A as less than 3%
<b>5.10 Allowing for uncertainty</b>	S5.10, Page 26	You have reduced uncertainty by using the most up to date methods and data when determining supply and demand forecasts.	Y	Explained in main report Chapter 3 and Technical Report 3.2
	S5.10, Page 26	You have analysed, quantified and discussed any uncertainties associated with your calculations of dry year annual average demand (and critical period scenarios if applicable).	Y	Technical Report 3.2
	S5.10, Page 26	You have used risk-based planning techniques to assess individual components of uncertainty, avoiding any double counting for (e.g. for target headroom components) or omission of uncertainties.	Y	Technical Report 3.2 and 4.9
	S5.10, Page 26	Alternatively, if you have applied an older target headroom approach to assess individual components of uncertainty, you have justified why this is appropriate. You have evaluated target headroom with regards to risk appetite and have allowed risk to increase with time as adaptations will occur in practice.	Y	Technical Report 3.2
	S5.10, Page 26	You have documented all assumptions and information used in the assessment of uncertainties and have discussed the relative significance of uncertainties showing which impact most on each WRZ.	Y	Technical Report 3.2
	S5.10, Page 26	You have considered options for reducing uncertainty in the planning period.	Y	Technical Report 3.2
	S5.10, Page 26	You have communicated uncertainty such that customers can clearly understand the issues and risks.	Y	Main report section 3.5 Technical Reports 3.2 and 4.9
	S5.10, Page 26	You have explained where there are any uncertainties related to non-replacement of time-limited licences (TLLs).	Y	Each time limited licence is assessed on a case by case basis. We are in close collaboration with the EA and plan well ahead if notification is given on a time limited licence.
	S5.10, Page 26	You have not included an allowance for possible future sustainability changes in headroom, and where relevant you have explored this through scenario analysis.	Y	Explored through scenario analysis as per section 5.7
<b>6.1 Considerations when choosing future solutions</b>	S6.1, Page 27	You have considered all options that will address any deficit(s) between supply and demand in any WRZ at any time during the planning period. You have justified your preferred solution(s) in your final plan.	Y	Explained in main report Chapters 4, 5 and 6 and Technical Report 4.9 (more detail available in Technical Reports 4.1 to 4.6)
	S6.1, Page 27	You have distinguished whether options apply to the dry year annual average and/or critical period scenarios, and your final plan addresses deficits in all scenarios for all WRZs across the planning period.	Y	Explained in main report Chapters 5, 6 and Technical Report 4.9
	S6.1, Page 27	You have considered options that will allow you to improve your service to customers, provide long-term best value, benefit the environment or collaborate with other water companies. You have justified your preferred solution(s) in your final plan.	Y	Explained in main report Chapter 5, specifically 5.5, 5.6, 5.7 & 5.8 and Technical Report 4.9 (more detail available in Technical Reports 4.1 to 4.6)
	S6.1, Page 27	You have documented all factors that have led you to consider options (whether in deficit or not) in your plan, including reasons.	Y	Explained in main report Section 5 and Technical Report 4.9 (more detail available in Technical Reports 4.1 to 4.6)
	S6.1, Page 27	You evaluated the environmental impacts of all possible and discarded options that could have unacceptable impacts that could not be overcome. You have further considered only those options that support achievement of RBMP objectives and would not result in deterioration.	Y	Explained in main report Section 5.8, 6.7 and Technical Reports 4.10 to 4.13

Section	WRPG ref.	Key compliance indicator	Compliant (Y/N)	Comments and updates
	S6.1, Page 27	You have considered the need to undertake an SEA or HRA for each option, and if appropriate undertaken them as a result.	Y	Explained in main report Section 6.7 and Technical Reports 4.11 and 4.12
<b>6.2 Resilience options</b>	S6.2, Page 28	You have evaluated whether options are needed to improve resilience to significant vulnerabilities which are not addressed within the planned level of service, and if needed explained this fully.	Y	Explained in main report Section 5.7 and Chapter 6
	S6.2, Page 28	The hazards you considered when evaluating resilience options were those listed in Resilience planning: good practice guide (UKWIR, 2013), and you have also considered hazards other than drought.	Y	Explained in main report Section 6.3
	S6.2, Page 28	You have considered the results of the Water Resources Long Term Planning Framework (Water UK, 2016), and WRSE and/or WRE as appropriate and incorporated the outcomes into your plan.	Y	Explained in main report Chapter 7.
	S6.2, Page 28	If resilience options have been considered, you have considered the costs and benefits and justified the solution.	Y	Explained in main report Section 6.3
	S6.2, Page 28	You have demonstrated customer support for the options you have proposed to improve resilience and the level of resilience the options will provide, and have a business case for the additional spending that resilience measures will involve.	Y	Explained in main report Chapter 2 and Technical Report 7.1
	S6.2, Page 28	You have described the option(s) in detail and have conducted the appraisal of resilience options to the same standard as non-resilience options.	Y	Explained in main plan sections 6.3.11 to 6.3.14.
<b>6.3 Third party options</b>	S6.3, Page 29	You have considered options, where appropriate, that involve engaging with third parties to help deliver solutions at lower cost, such as upstream services, leakage detection and demand management. You have used the Market Information Platform to assess third party bids (when available).	Y	Explained in main report Section 7.4 and Technical Reports 4.2 and 5.2
	S6.3, Page 29	You have subjected options involving third parties to the same scrutiny and testing as other options.	Y	Explained in main report Chapter 4 and Technical Reports 4.2 and 5.2
	S6.3, Page 29	Where relevant, your plans clearly sets out which options within the final planning scenario are third party options.	Y	Explained in main report Chapter 6 and Technical Reports 4.1, 4.2 and 5.2
<b>6.4 Upstream competition</b>	S6.4, Page 29	For water companies in England, you have checked that there are no requirements with regards to reforms relating to competitive services for supply to/removal from your network following the Water Act 2014.	N/A	N/A
<b>6.5 Assessing solutions for your plan</b>	S6.5, Page 29	Your appraisal of options follows the eight stage approach outlined in WRMP 2019 Methods – decision making process guidance (UKWIR, 2016). 1. Collate and review planning information. 2. Identify unconstrained options. 3. Problem characterisation and evaluate strategic needs/complexity. 4. Decide modelling method. 5. Identify and define data inputs. 6. Undertake decisions making modelling / options appraisal. 7. Stress testing and sensitivity analysis. 8. Final planning forecast and comparison to EBSD benchmark.	Y	Explained in main report Chapter 5 and Technical Reports 4.1 to 4.7 and 4.9
	S6.5, Page 29	You have demonstrated that your final planning forecast is your best value plan, not necessarily the least cost solution, accounting for all criteria that sensitivity analysis has established are important to the plan.	Y	Explained in main report Chapter 6 and Technical Report 4.9
<b>6.6 Unconstrained list</b>	S6.6, Page 30	You have developed an unconstrained list of all plausible technically feasible options, including drought measures, and have at least considered options presented in WR27 Water resources tools (UKWIR, 2012) and the EBSD method.	Y	Explained in main report Section 4.2 and Technical Reports 4.1 and 4.2
	S6.6, Page 30	For water companies in England, you have included third party options (see 6.3) in the unconstrained list, and have demonstrated you have invited or considered third party collaborations or provide a clear explanation of why third party option have not been included.	Y	Explained in main report Section 4.2 and Technical Report 5.2
<b>6.7 Feasible list</b>	S6.7, Page 30	Your feasible list is a subset of your unconstrained list and you have demonstrated that all options on your preferred list are suitable for promotion.	Y	Explained in main report Section 4.3 and 4.4 and Technical Reports 4.1, 4.2, 4.3, 4.5, 4.6 and 4.9
	S6.7, Page 30	You have communicated your feasible list to the Environment Agency and/or Natural Resources Wales as soon as possible and discussed it with them.	Y	Yes, meeting minutes available

Section	WRPG ref.	Key compliance indicator	Compliant (Y/N)	Comments and updates
	S6.7, Page 31	You have clearly described the screening criteria you have used to identify feasible options and have applied these consistently to achieve a balance between the number of options included and availability of realistic choices.	Y	Explained in main report Section 4.3 and Technical Report 4.3
	S6.7, Page 31	You have provided a full description of all feasible options that you have considered, including main operational features, expected implementation extent, conceptual diagram etc.	Y	Available in Technical Reports 4.5, 4.6 and 4.7
	S6.7, Page 31	You have compared each feasible option to the baseline case, and provided a profile of the extra water available over the 80 years from initial investment in the option.	Y	In WRP Tables
	S6.7, Page 31	Where you are transferring water / commissioning new sources and this increases the risk of non-compliance, you have included steps to mitigate those risks (e.g. INNS, discolouration, nitrates, pesticides).	Y	Technical Report 4.3
	S6.7, Page 31	You have assessed the level of customer support for each option.	Y	Explained in main report Chapter 2 and 5 and Technical Reports 4.9 and 7.1
	S6.7, Page 31	You have appropriately estimated the amount of time needed to investigate and implement the option and have proposed an earliest start date based on your review.	Y	Available in Technical Reports 4.5, 4.6 and 4.7
	S6.7, Page 31	You have appropriately assessed and reported the risks and uncertainties associated with each option, including the likelihood of reduced yield due to factors such as climate change, environmental constraints and customer behaviour. You have considered the flexibility of the option to adapt to future uncertainty.	Y	Explained in main report Chapter 6 and Technical Report 4.9
	S6.7, Page 31	You have explained any factors or constraints specific to the option, and have highlighted any links or dependencies on other existing schemes, other options and any mutual exclusivity with another option.	Y	Available in Technical Reports 4.5, 4.6 and 4.7
	S6.7, Page 31	You have described how the option will be utilised and the impact on costs.	Y	Explained in main report Chapter 6 (costs section 6.8) and Technical Report 4.9 and WRP tables
	S6.7, Page 31	You have assessed the environmental impacts of the option, including implications for RBMP objectives, and have undertaken and reported the outcomes of a Habitats Regulations Assessment (HRA) if the option has been found to potentially affect any designated site.	Y	Explained in main report Section 5.8, 6.7 and Technical Reports 4.11, 4.12, 4.13
	S6.7, Page 31	You have undertaken a cost-benefit appraisal of the option, including a cost breakdown over the 80 year period and covering capital, operating and financing costs. Your method is aligned to Ofwat's most recent guidance for PR19 and the WRPG, and gives Average Incremental Costs (AIC) based on maximum capacity costs divided by maximum capacity outputs expressed as net present value (NPV). You have explained how you arrived at your AIC figure.	Y	Explained in main report Chapter 5 and Technical Report 4.9
	S6.7, Page 31	As part of the cost-benefit appraisal, you have evaluated the environmental and social (including carbon) costs and benefits of the options and show either a monetised profile of Average Incremental and Social Costs (AISC), or a non-monetised assessment of impacts. You have stated your approach to calculation of AISC.	Y	Explained in Technical Report 4.9
	S6.7, Page 31	For supply options, as part of your cost-benefit appraisal you have determined supplementary costs required to distribute the new supply (e.g. service reservoirs, pumping stations, mains upgrades), excluding costs associated with local infrastructure enhancements.	Y	Explained in Technical Report 4.9
	S6.7, Page 32	You have evaluated whole-life costs that include treatment, pumping, network, storage, maintenance and operation costs (the latter included control measures relating to water quality optimisation, fluoridation, chemical stabilisation, aesthetic impacts on consumers and control of disinfection by-products).	Y	Explained in Technical Report 4.9
<b>6.8 Environmental and social impacts</b>	S6.8, Page 32	You have considered the environmental and social impact of each option of the feasible list.	Y	Explained in main report Section 4.6 and Technical Report 4.11
	S6.8, Page 32	You have assessed impacts using a method that is proportionate to the scale of the problem and have fully justified your approach.	Y	Explained in main report Section 4.6 and Technical Reports 4.11, 4.12, 4.13

Section	WRPG ref.	Key compliance indicator	Compliant (Y/N)	Comments and updates
	S6.8, Page 32	You have applied an Ecosystem Services approach to environmental evaluation, if appropriate, and your method gives accountable and transparent outcomes that consider stakeholder needs.	Y	Explained in Technical Reports 4.5. 4.6 , 4.11, 4.12, 4.13
	S6.8, Page 32	You demonstrate that you have used the best available evidence and data in your assessment, and the conclusions you draw are robust, locally valid and justifiable.	Y	Explained in Technical Reports 4.5. 4.6 , 4.11, 4.12, 4.13
	S6.8, Page 32	You provide a clear audit trail of your appraisal of environmental and social impacts and explain the data you use, the results and recommendations from the appraisal.	Y	Explained in Technical Reports 4.5. 4.6 , 4.11, 4.12, 4.13
<b>6.9 Solutions driven by changes to existing abstraction licences</b>	S6.9, Page 32	You have worked with the Environment Agency or Natural Resources Wales to understand the cost effectiveness of solutions that are driven by changes to existing abstraction licences.	Y	Explained Technical Report 1.4 and 4.9.
	S6.9, Page 32	You explain how any solution driven by changes to existing abstraction licences meets the objectives of the Habitats Directive, Wildlife and Countryside Act and Water Framework Directive and prevents any deterioration of water bodies.	Y	Technical Reports 4.11, 4.12, 4.13
	S6.9, Page 32	You have considered whether measures needed to meet sustainability and environmental objectives (e.g. related to HD, WCA and WFD) are cost-effective and cost-beneficial, and are supported by customers.	Y	Explained in main report Section 5.8, 6 and Technical Reports 4.11, 4.12, 4.13, 4.9 and 5.1
	S6.9, Page 33	You have explained how the cost has been evaluated (where cost include non-monetised costs) and that the benefit outweighs the cost, the option is not disproportionately costly and has the lowest overall costs even when accounting for the need for customer support.	Y	Explained in main report Section 5 (specifically 5.5.19 to 5.5.24) and Technical Report 4.9
<b>6.10 Deciding on a solution</b>	S6.10, Page 33	You have explained the approach you have taken to arrive at the best solution(s), making use, as appropriate, of the UKWIR Decision Making process to develop a decision-making framework and identify methods to determine which solution(s) is/are best.	Y	Explained in main report Section 5 and Technical Report 4.9
	S6.10, Page 33	You have used the EBSD method within the process of identifying best solution(s), e.g. to provide a benchmark against which outcomes of alternative methods can be compared.	Y	Explained in main report Section 5 and Technical Report 4.9
	S6.10, Page 33	You have explained which methods other than EBSD have been used within the process of identifying best solutions, including justification for their appropriateness, such as differences and improvements.	Y	Explained in main report Section 5 and Technical Report 4.9
	S6.10, Page 33	You have clearly and transparently set out the economic, social and environmental justifications for your final choice of solution, and demonstrated why you have decided on this approach and discounted others. You have provided a clearly reasoned justification for how the decision has been made, as well as the decision. Your explanations are able to be clearly interpreted by customers, interested parties and regulators.	Y	Explained in main report Section 6.7 Technical Report 4.11
	S6.10, Page 33	You have considered how future changes might affect the solution or whether any potential future changes might make it redundant.	Y	Explained in main report Section 5, 6.4, and Technical Report 4.9
	S6.10, Page 33	You have considered the resilience of the solution against a range of possible futures.	Y	Explained in main report Section 5.7 and Technical Report 4.9
	S6.10, Page 33	You demonstrate that the possible futures considered include potential future impacts of regional or cross sector demand.	Y	Explained in main report Chapter 5 and Technical Report 4.9 and 5.1
	S6.10, Page 33	You have assessed the costs and benefits of the chosen solution, and have set out your assessment of whether the benefits of implementing the solution are greater than the costs. Your preferred solution is best value.	y	Explained in main report Section 5.5.19 to 5.5.24 and Technical Report 4.9
	S6.10, Page 33	You have described the steps you have taken to carry out a Strategic Environment Assessment and Habitat Regulations Assessment for your chosen solution, or demonstrated why this is not needed. Where relevant, you have incorporated any outcomes from the SEA and/or HRA into your final plan.	Y	Explained in main report Section 6.7 and Technical Reports 4.11, 4.12, 4.13
	S6.10, Page 33	Where the option involves sharing resources, you have explained who will have ultimate rights to the water and why. You have also provided details of how the option will operate, funding mechanisms, legal arrangements, drought implications.	Y	Explained in main report paragraph 6.3.6

Section	WRPG ref.	Key compliance indicator	Compliant (Y/N)	Comments and updates
<b>6.11 Water Framework Directive</b>	S6.11, Page 33	You have considered and prioritised solutions that promote the requirements of Article 7 of the WFD and are consistent with RBMP objectives and solutions, highlighting how you will or are working with others to achieve this.	Y	Explained in main report Section 6.7.10 to 6.7.13 and Technical Report 4.13
	S6.11, Page 33	You have described how the impact of changes to the operation of existing sources and / or the impacts of new sources on WFD water body status has been established, and that you have rejected sources that might cause deterioration or prevent the achievement of good status.	Y	Explained in main report Section 6.7 and Technical Report 4.13
	S6.11, Page 33	You have described any intended actions that may cause deterioration of status/potential or prevent good status/potential being achieved. You have discussed this with the Environment Agency or Natural Resources Wales and made a clear statement in the plan of any potential impacts of any intended actions.	Y	Explained in main report Section 6.7 and Technical Report 4.11, 4.12, 4.13
	S6.11, Page 33	You have included targeted and cost effective restoration measures, and have considered how you will apply adaptive management measures solely or working in partnership with other relevant organisations.	Y	Explained in main report Section 6.7, Technical Report 4.9 and technical report 4.11
<b>6.12 Testing your plan</b>	S6.12, Page 34	You have explained the scenario testing you have undertaken to evaluate the resilience of your plan to a range of risks.	Y	Explained in main report Section 5.7 and Technical Report 4.9
	S6.12, Page 34	Based on scenario testing, you have described the factors and risks having the most significant impact on your plan, and the possible timings of these impacts.	Y	Explained in main report Section 5.7 and Technical Report 4.9
	S6.12, Page 34	You have explained the scenario testing you have undertaken to show the plan is robust to minor changes to supply and demand forecasts in the near future and to more moderate changes as the plan progresses.	Y	Explained in main report Section 5.7 and Technical Report 4.9
	S6.12, Page 34	You have explained the scenario testing you have undertaken to compare your preferred plan with, or to identify, alternative options.	Y	Explained in main report Section 5.7 and Technical Report 4.9
	S6.12, Page 34	Based on scenario testing, you have justified how you will manage risk and future uncertainties (e.g. in response to new evidence becoming available), and what you will monitor to help manage these risks.	Y	Explained in main report Section 5.7 and Technical Report 4.9
	S6.12, Page 34	Based on scenario testing, you have explained when and why important decisions should be made within the period of the plan.	Y	Explained in main report Section 5, 6.4 and Technical Report 4.9
	S6.12, Page 34	You have explained how scenario testing demonstrates that you have not over-planned for a worst-case scenario that is very unlikely.	Y	Explained in main report Chapter 5 (specifically 5.3, 5.4 & 5.5) and Technical Report 4.9