

United Utilities Water Drainage and Wastewater Management Plan 2023

Statement of Response

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May 2023

Executive Summary

United Utilities Water (UUW) has developed its Drainage and Wastewater Management Plan (DWMP) in collaboration with customers and stakeholders to set out how the company proposes to maintain robust and resilient drainage and wastewater services for customers in the North West. The draft DWMP (dDWMP) was published on 30 June 2022 and customers, stakeholders and regulators were invited to provide feedback via a formal consultation process. Over 50 responses were received and in order to capture all of the feedback, the draft Statement of Response (SOR) was produced and published on the 15 December 2022. Between draft and final publication, there has been further development of our Statement of Response which aims to summarise all of the feedback received on the dDWMP across a range of topic areas, how we have addressed it between draft and final publication and where the reader can find these changes in the final DWMP (fDWMP).

The key themes arising from the draft consultation were:

- Options development, programme optimisation and the preferred plan;
- Stakeholder engagement and partnership solutions;
- Customer acceptability;
- Storm overflows;
- Wider strategic ambition of the DWMP;
- DWMP document structure and content; and
- All other feedback

We have provided further detail where necessary to address the feedback on our dDWMP, which can be found in section 2 onwards of this document. While long-term planning for wastewater services is not new, this is the first time a DWMP has been produced and it is not a static programme. The feedback throughout the consultation process has supported the development of the final plan as well as the approach taken for cycle two of the DWMP.

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Glossary

For the glossary, refer to document C003.

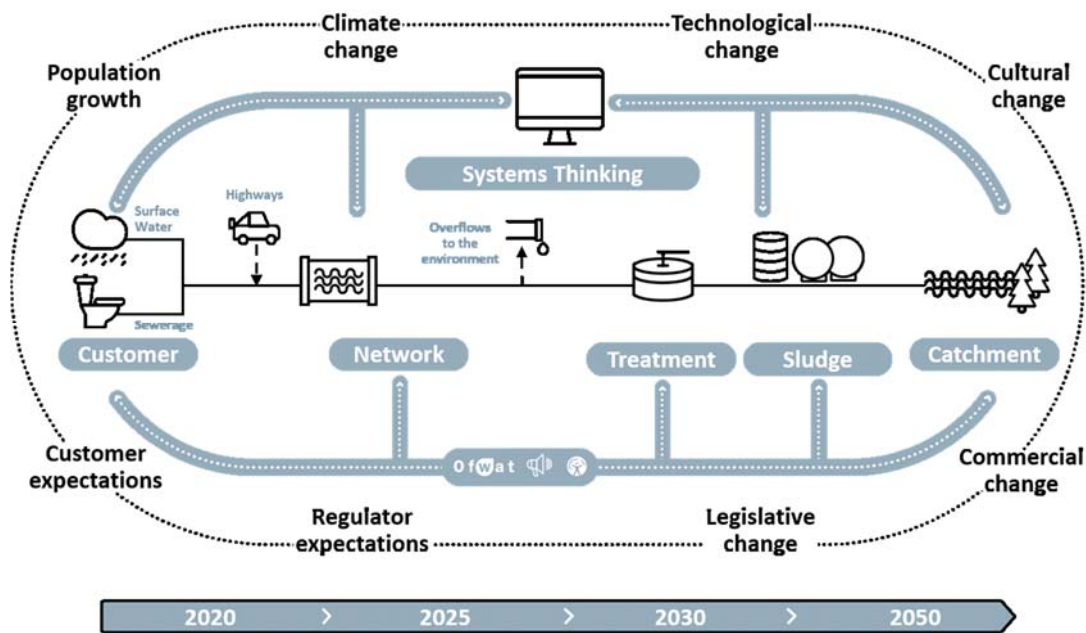
1. Introduction

1.1 Background

1.1.1 United Utilities Water’s (UW) purpose is to provide excellent water and wastewater services for the North West. To deliver on this, we need to work closely with a wide range of stakeholders, as many of the obstacles and opportunities faced are collective and best tackled together. Our region has significant environmental and social challenges ahead. With a changing climate and a growing population, the future is uncertain. We need to continue and enhance our management of the effects there may be on our wastewater services, the environment they protect and the experience of our customers. New challenges and opportunities will arise and this is why we are preparing for the future, managing uncertainties and adapting to changes in order to be resilient and cost effective.

1.1.2 In developing our Drainage and Wastewater Management Plan (DWMP), we have taken a long-term approach that sets out how we propose to ensure we provide robust and resilient drainage and wastewater services for the North West. Our DWMP is a holistic plan that encompasses all aspects of drainage and wastewater management from customers’ taps through to discharging treated wastewater back to the environment (Figure 1).

Figure 1 A summary of the considerations included in the DWMP



1.1.3 On 30 June 2022, we published our draft DWMP (dDWMP). It set out our proposal for just over £3.5 billion of investment from 2025 to 2050 to meet the DWMP planning objectives and likely statutory requirements, with a provisional view that a potential further £18 billion may be needed to meet Defra’s Storm Overflow Discharge Reduction Plan (SODRP) requirements. The DWMP process strives to address the direct wastewater and other associated social challenges affecting the North West, especially in light of the challenges we face as a result of climate change and population growth, the impacts of which are exacerbated by the region’s prevalence of combined sewers and propensity for high and flashy rainfall.

1.1.4 We have engaged with stakeholders and customers throughout the development of the dDWMP including setting the long-term targets, identifying areas of shared risks or opportunities, determining options for the preferred plan and understanding their views on the draft and final preferred plan.

1.1.5 We would like to take the opportunity to thank all those involved in the development of our plan and who provided feedback on our dDWMP through numerous channels such as our online survey comprising 54 multiple choice questions, three interactive stakeholder workshops, and bespoke responses via our DWMP mailbox. We received over 50 consultation responses from customers,

stakeholders and regulators (Figure 2) and in order to capture and respond to all of the feedback, we produced our Statement of Response.

Figure 2 A summary showing the number of customers, stakeholders, regulators and others who provided consultation feedback



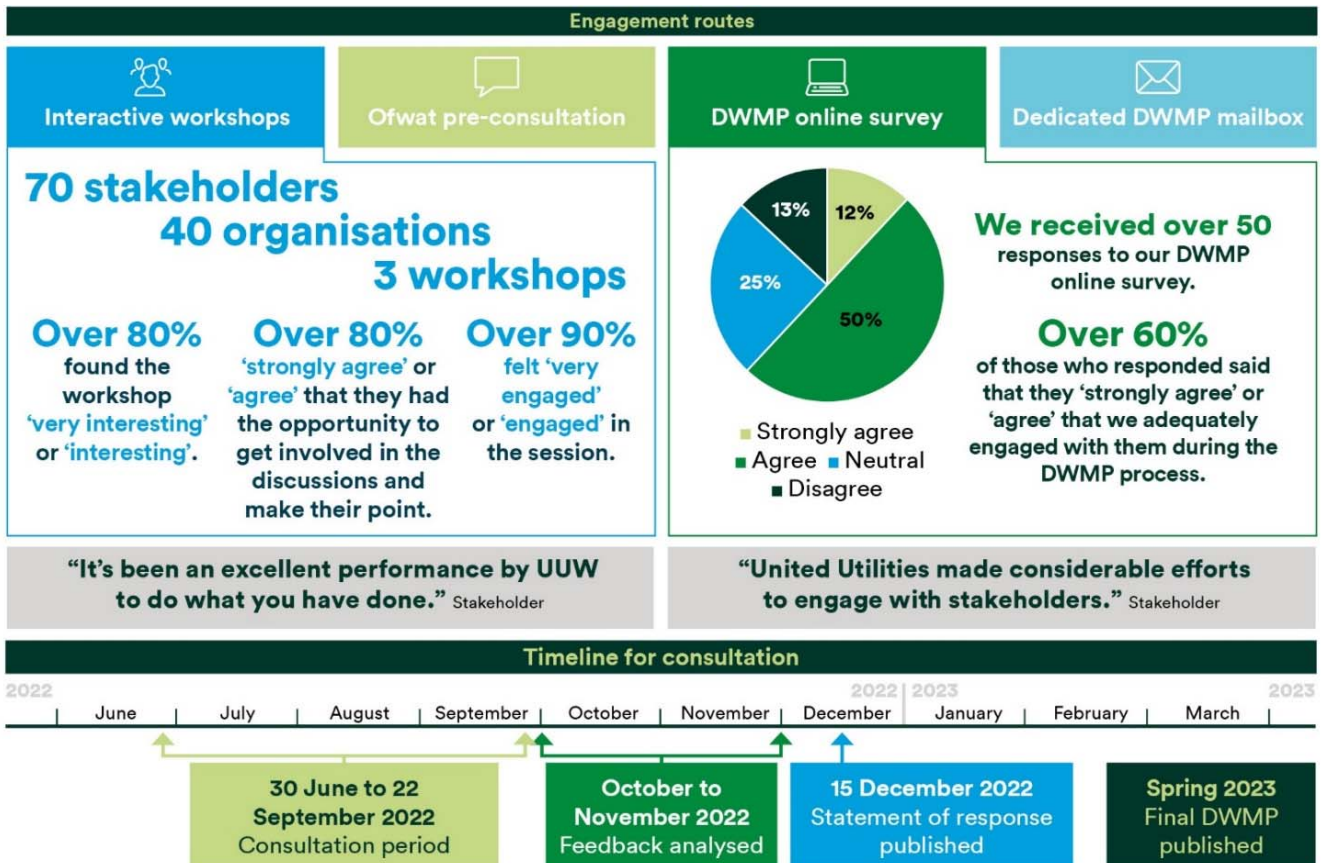
1.1.6 Since our initial Statement of Response was published on the 15 December 2022, we have used insight from the draft consultation feedback as well as further stakeholder and customer engagement to inform the development of our final plan. For example, between draft and final DWMP publication, we have carried out further optimisation of the preferred plan to ensure that the feedback received has been taken into account, such as including more nature-based/blue-green and hybrid (blue-green and traditional combined) solutions.

1.1.7 This document aims to summarise the feedback on the dDWMP across a range of topic areas, our response, and the steps we have taken to address the comments and where the evidence of the actions taken may be found in the final DWMP (fDWMP) documentation.

1.2 Our approach to consultation

1.2.1 After the publication of the dDWMP, we held a 12-week consultation period for customers, stakeholders and regulators to provide feedback on the plan through a number of approaches highlighted in Figure 3.

Figure 3 Our approach to consultation



1.3 Key themes from feedback and our response

1.3.1 In order of highest frequency, the key themes from the feedback were:

- Options development, programme optimisation and the preferred plan;
- Stakeholder engagement and partnership solutions;
- Customer acceptability;
- Storm overflows;
- Wider strategic ambition of the DWMP;
- The DWMP document; and
- All other feedback.

1.3.2 The following sections provide more detail on each of the themes summarising what we included in our dDWMP, the feedback, our response, the steps we have taken to address these comments and where readers can find evidence of these actions within the final DWMP documentation.

1.3.3 **Note:** All of the customer feedback received was via our online survey, and more detailed feedback was obtained from stakeholders and regulators through workshops and email. As a result, our consultation response is, in particular, more heavily influenced by these perspectives. We engaged with customers on the DWMP as an integral part of the plan development to ensure opinions were considered throughout. For more detail please refer to *Technical Appendix 9 – Customer Engagement* which is available through our corporate website.

2. Options development, programme optimisation and the preferred plan

2.1 Introduction

- 2.1.1 The options development phase of the process looks to mitigate the risks identified to customers through the Baseline Risk and Vulnerability Assessment (BRAVA¹) by developing the appropriate solutions. This was done using an iterative screening process as we acknowledge that due to the interconnected nature of drainage and wastewater, options need to be considered holistically.
- 2.1.2 We did this by creating option blends that comprised a combination of different intervention types. This has allowed for options to be utilised that contribute to meeting multiple performance targets, even if the options cannot fully resolve the risk identified. The approach to using option blends supports Systems Thinking by allowing for the consideration of a holistic range of options as part of the solution. There is a recognition that a partial solution adds value when managing risk. This particularly supports the selection of nature-based solutions such as sustainable drainage systems (SuDS) and operational improvements utilising innovative technology to drive performance benefits. Option blends allow for incremental improvements to achieve targets while encouraging least regrets solutions to be prioritised thus forming a key building block of our adaptive planning² approach for DWMP.
- 2.1.3 In the development of the dDWMP, we focused on producing an optimised programme, which meets customer and regulatory expectations and considers affordability, while also driving significant improvement and system resilience in areas such as flooding. The draft preferred plan set out just over £3.5 billion of investment over 25-years with a further £18 billion set out to address storm overflows. A large proportion of this proposed investment was for new assets driven by likely statutory requirements through the Water Industry National Environment Programme (WINEP).
- 2.1.4 Between draft and final publication of the DWMP, we have taken steps to carry out further optimisation of our preferred plan to ensure alignment with our WINEP programme, and to further drive hybrid and green-blue solutions in line with feedback received through draft consultation.
- 2.1.5 For more detail please refer to:
- *Technical Appendix 7 – Options Development and Appraisal; and*
 - *Technical Appendix 8 – Programme Optimisation.*

2.2 Consultation feedback

- 2.2.1 We received a range of positive feedback regarding our approach to options development, programme optimisation and the preferred plan from regulators and stakeholders (Figure 4). The importance of an adaptive plan that prioritises low carbon and green solutions was acknowledged, with regulators complementing our options hierarchy approach to prioritise low-carbon, green solutions over traditional grey ones where possible. Results from the online survey showed that respondents supported our approach to the options hierarchy and the prioritisation of nature-based solutions (Figure 5).

¹ The purpose of the Baseline Risk and Vulnerability Assessment (BRAVA) is to understand how future changes might impact on our ability to achieve planning objectives and understand potential resilience risks.

² An adaptive plan demonstrates multiple potential scenarios and pathways that could happen due to changes in such as technology, customer needs and regulatory expectations. It allows for change in direction when new needs arise.

Figure 4 Examples of positive feedback regarding options development, programme optimisation and the preferred plan

“We like the options hierarchy that underpins the best value approach, and that blue/green solutions are above grey solutions.”

Regulator

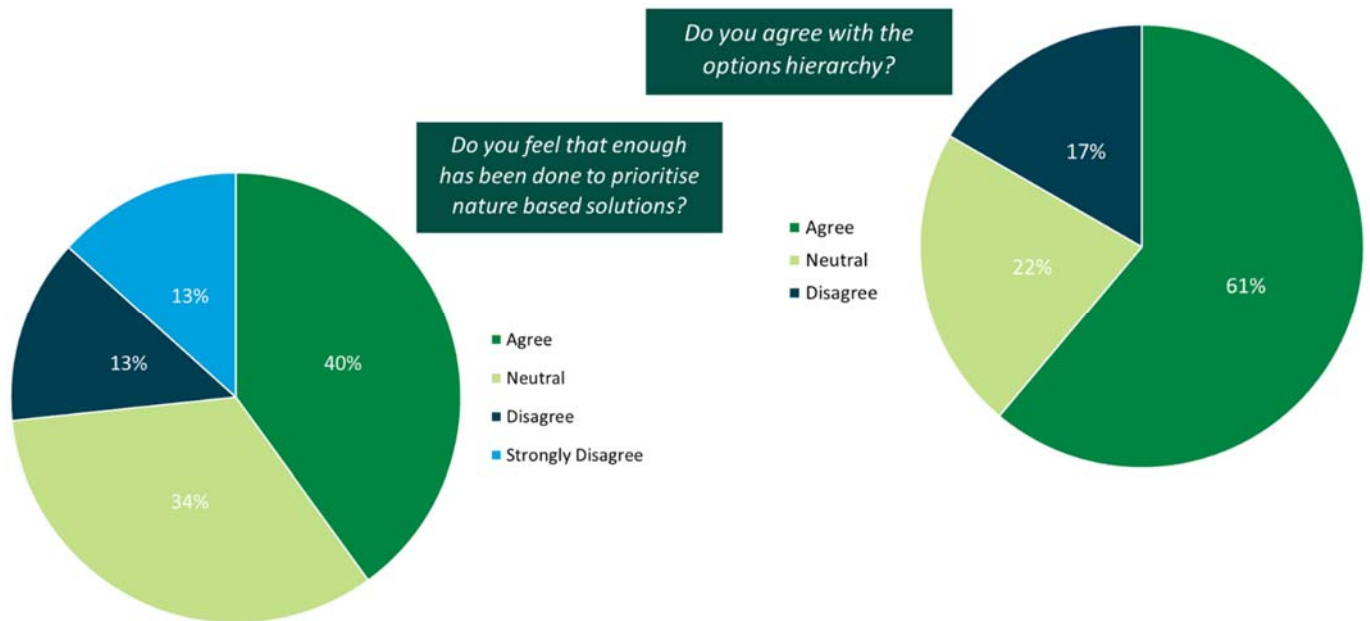
“We are pleased to see the six capitals approach driving the company to adopt the best value approach rather than the lowest whole life cost.”

Regulator

“The preferred plan intervention types appear to offer a range of behavioural, soft and hard measures. They also follow a path aimed at reserving more carbon intensive measures for where other options are not feasible.”

Stakeholder

Figure 5 Results from the online survey



2.2.2 Respondents also raised some areas for improvement and the main emerging themes were:

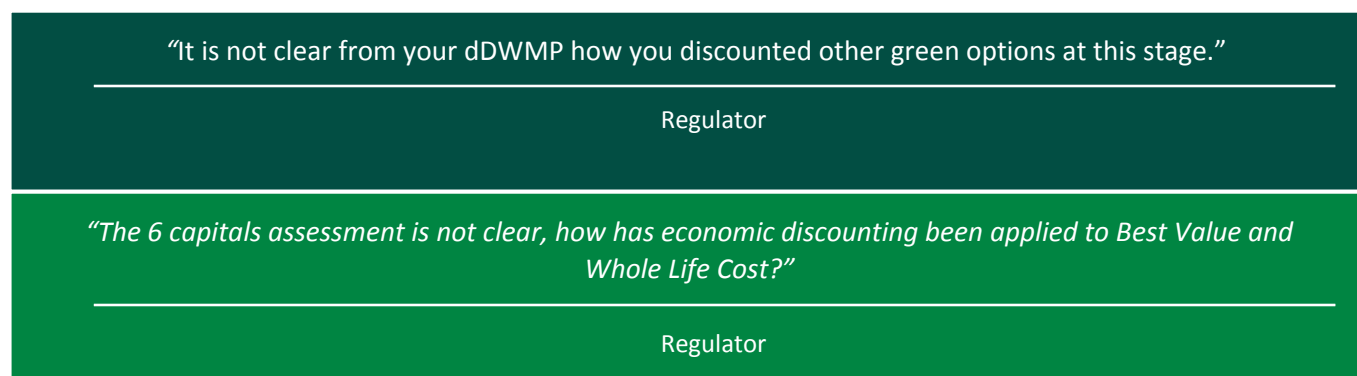
- Options development and programme optimisation;
- The preferred plan;
- Adaptive planning; and
- WINEP and legal obligations.

2.3 Our response and action taken between draft and final publication to address feedback

2.3.1 Options development and programme optimisation

- 2.3.1.1 In the feedback received from the draft consultation on options development and programme optimisation, respondents largely requested to see further detail and clarity on how we selected options in the plan particularly in regards to blue-green solutions and why they may have been discounted. Respondents focused on the implementation of upstream management, surface water management and nature-based solutions to develop our ‘best value’ plan. Respondents wanted to see further detail on our approaches taken with the options hierarchy and the six capitals assessment.
- 2.3.1.2 Figure 6 shows examples of the comments we received from respondents on options development and programme optimisation. For the full list of comments received refer to Table 1 of Appendix A.

Figure 6 Examples of comments received on options development and programme optimisation



- 2.3.1.3 We recognise the importance of developing a ‘best value’ plan that prioritises low carbon, nature-based solutions that intercept surface water within the catchment which is why we have used the best available information and technology throughout the development of the DWMP to prioritise blue-green solutions.
- 2.3.1.4 However, the targets set out in the planning objectives cannot be achieved using blue-green solutions alone and a hybrid approach is required. It is anticipated that, through technological advancements and regulatory reform, future iterations of the DWMP will include higher numbers of blue-green actions.
- 2.3.1.5 An iterative screening approach was used to narrow down and ‘reject’ unfeasible options. We first assessed the technical and geographical feasibility of options within drainage areas. We then established cost, performance and wider risks/benefits to derive a smaller list of ‘feasible’ options. The preferred options were determined looking at a variety of combinations, considering any wider benefits through the six capitals approach, and assessing them against the option hierarchy which prioritised blue-green solutions.
- 2.3.1.6 With regards to our approach to the six capitals assessment, we used the guidance from the Government’s Green Book to inform which discount rates to use. This is standard practice in capitals accounting, and aligns with the approach taken for our natural capital corporate account.
- 2.3.1.7 The DWMP is a 25-year planning tool which is revisited every five-years and, as such, the plan will mature between cycles to reflect changes in thinking, data available and technological advancement. Our ambition is to continue to collaborate and work in partnership with other catchment hosts to implement a catchment-based, proactive approach to mitigating shared risks throughout the catchment with a focus on green-blue solutions and innovative technologies such as Dynamic Network Management.

- 2.3.1.8 An example of this ongoing work is the Integrated Water Management Plan (IWMP), which the Environment Agency, UUW and GMCA started to co-develop in September 2022 through the Trilateral Partnership, and which should help to move our organisations from ‘operating in parallel’ within Greater Manchester to ‘aligned and integrated’, helping maximise outcomes and benefits for the location. The collation of capital programmes from numerous organisations informs early opportunities for the IWMP, which has started to highlight locations where there may be a benefit from integrating planning and delivery between organisations.
- 2.3.1.9 Between draft and final publication, we have carried out further optimisation of the preferred plan to ensure alignment with our WINEP programme and to further prioritise low carbon, blue-green solutions in line with the consultation feedback.
- 2.3.1.10 UUW has also taken steps to provide further clarity and detail on our approach to Options Development and Appraisal, including how we discounted various options, as well as the six capitals assessment and how we have developed the best value and alternative scenarios.
- 2.3.1.11 While long-term planning for wastewater services is not new, this is the first time we have produced a DWMP. The DWMP will be renewed on a five-yearly basis and is therefore not a static programme. The approaches taken in cycle one of the DWMP have established a strong foundation which will be built upon in the future iterations of the plan. Between draft and final publication of the DWMP, we have taken steps to incorporate and act on draft consultation feedback wherever possible to inform our FDWMP. In some cases, we were unable to carry out actions between draft and final publication due to time constraints and resources available. All of the feedback received will be given due consideration as we progress towards cycle two of the DWMP to inform our approach.
- 2.3.1.12 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Technical Appendix 7 – Options Development and Programme Appraisal; and*
 - *Technical Appendix 8 – Programme Optimisation.*

2.3.2 The preferred plan

- 2.3.2.1 In the feedback received from the draft consultation on the preferred plan, respondents focussed on the prevalence of ‘traditional’ grey storage in the plan and emphasised the need to incorporate more blue-green solutions into the final plan. Respondents also wanted to see more specific details, particularly at local levels, on what this would mean in the catchment and how it would be delivered. There were also a number of responses which referenced named locations Staveley, Warrington and the Eden and Esk.
- 2.3.2.2 Figure 7 shows examples of the comments we received from respondents on the preferred plan. For the full list of comments received refer to Table 2 of Appendix A.

Figure 7 Examples of comments received on the preferred plan

“We feel it is a good high level plan but it doesn’t contain enough detail to define what is going to be delivered or how we would measure outputs and outcomes. We would like to understand whether you intend to increase the level of granularity so we can see what is being planned in each of the SPUs.”

Regulator

“The DWMP is at a very high level and has identified a range of different, generic options that will be carried out within the SPAs and TPUs, however none of these are specific to particular locations so at this stage so it is difficult to provide detailed comment.”

Regulator

“The preferred plan intervention types appear to offer a range of behavioural, soft and hard measures. They also follow a path aimed at reserving more carbon intensive measures for where other options are not feasible.”

Stakeholder

- 2.3.2.3 For this cycle of the DWMP, we have identified 'best value' interventions in developing our preferred plan to consider and include a wide range of benefits for both our customers and the environment.
- 2.3.2.4 For the draft preferred plan, new assets and upstream management (e.g. SuDS) made up the largest proportion of investment at a regional level. This was generally in the form of storage options, which are implemented to deliver remaining capacity increases in the sewerage system.
- 2.3.2.5 The high proportion of traditional grey storage in the draft preferred plan was a result of the proximity of the Defra consultation on storm overflows to the draft DWMP submission date, allowing minimal time for optimisation of preferred options in this area and development of blue-green and hybrid solutions. We have significantly increased the prevalence of blue-green solutions in the final plan.
- 2.3.2.6 In order to achieve the ambitious targets and time frames set out in the Defra Storm Overflow Discharge Reduction Plan, we will still need to build additional grey storage solutions as these targets cannot be achieved using blue-green solutions alone. The region’s high prevalence of combined sewers and high/flashy rainfall exacerbate the impacts of climate change and population growth alongside considerations such as land acquisition, seeking partnerships and allowing nature-based solutions to mature meaning that the scale of the challenge is significant.
- 2.3.2.7 As information and technology improve around the performance and implementation of blue-green solutions, it is anticipated that future iterations of the DWMP will more fully reflect our ambition to increase hybrid and nature-based solutions throughout the region. Between draft and final publication of the DWMP, further optimisation of the preferred plan has been carried out to ensure alignment with our WINEP programme and drive blue-green solutions.

- 2.3.2.8 The DWMP is a high-level, strategic plan which outlines the modelled risk of external pressures such as climate change and population growth on our systems and services over a 25-year period. The DWMP utilises a decision support tool and will help to prioritise risks and opportunities, set our near-term investment plans in the context of the longer-term and identify potential investment needs for the longer-term.
- 2.3.2.9 The DWMP will be used in conjunction with other planning mechanisms such as the Water Resource Management Plan (WRMP) to inform and support the development of the business plan for investment cycle 2025–2030. Due to the high-level nature of the DWMP, we are not able to fully commit to specific deliverables in small catchments, including exactly when and where they would occur, without further investigation.
- 2.3.2.10 The DWMP is based on modelled risk which naturally comes with some uncertainty. Further investigation and detailed design is needed to understand risks at a local, near-term level. The potential effects on any designations will be considered at every design and planning stage for each option (and their component schemes), to ensure that potential adverse effects are identified and avoided during the design process. The DWMP will be used in conjunction with other longer-term plans to inform the shorter-term business plan for investment cycle 2025–2030.
- 2.3.2.11 UUW’s ambition is to continue to drive innovative solutions in partnership and collaboration with other catchment hosts. With regard to partnership solutions, given the complexities, it is difficult to predict the likelihood of partnership schemes progressing, however, through ongoing work, such as the development of our organisation-wide partnership framework, we hope to increasingly overcome these challenges, factoring in key considerations such as; types of solution, maturity levels of partnership and availability of potential funding streams. The DWMP partnership opportunity pipeline has been further developed to feed into a number of UUW schemes including the Green Recovery Funding, the Fylde Hub and the Greater Manchester IWMP to potentially mature some of the DWMP partnership opportunities into projects. Further detail will be available in our business plan for investment cycle 2025–2030 later this year.
- 2.3.2.12 For final publication, we have taken steps to provide further clarity and detail on how the DWMP will inform catchment-based projects and approaches as well as case studies of how this will look on the ground.
- 2.3.2.13 The following sections provide summaries for the feedback relating to named places:
Eden and Esk
- 2.3.2.14 The DWMP is a high-level, strategic plan that aims to understand the impacts of external pressures such as climate change and population growth on our systems over the next 25-years. UUW has been working with various stakeholders on the large amount of development in Carlisle. While we expect some development to start in the next few years, it is clear that the development will be built up over time. This means that the impact of the growth on our infrastructure will occur gradually and over a number of our five-yearly investment planning periods. The rate at which development occurs is critical to consider how we time any investment response that may be required which will be done in a holistic manner across Carlisle including the impact on the existing network and River Caldew Sewer.
- 2.3.2.15 We are aware of a number of erosion risks across the region and regularly monitor these to understand them further as we have to prioritise investment across all areas of the North West that we serve. We are constantly reviewing our risks and prioritisation via our corporate systems. In terms of Eamont Bridge, we regularly speak to the Environment Agency to understand the impact of their work on our assets.

Staveley

2.3.2.16 The DWMP is a high-level, strategic plan that aims to understand the impacts of external pressures such as climate change and population growth on the system over a 25-year period. However, UUW recognises the problems faced at Staveley Wastewater Treatment Works and there are ongoing investigations into them. We are working closely with various organisations such as the Environment Agency and collaborating with the Lead Local Flood Authorities to develop a collaborative sustainable surface water removal plan to minimise the risks in the system.

Warrington North

2.3.2.17 The figure referred to in the comment by Warrington Borough Council is in reference to demonstrating the percentage split of investment across the different drivers, not necessarily the associated benefits of the investment. Certain intervention types are inherently more costly than others and the increase in expenditure does not necessarily correlate with an increased benefit. Overall, across the entire Strategic Planning Area the flooding benefit outweighs the environmental benefit despite the difference in investment.

2.3.2.18 While long-term planning for wastewater services is not new, this is the first time we have produced a DWMP. The DWMP will be renewed on a five-yearly basis and is therefore not a static programme. The approaches taken in cycle one of the DWMP have established a strong foundation which will be built upon in the future iterations of the plan. Between draft and final publication of the DWMP, we have taken steps to incorporate and act on draft consultation feedback wherever possible to inform our fDWMP. In some cases, we were unable to carry out actions between draft and final publication due to time constraints and resources available. All of the feedback received will be given due consideration as we progress towards cycle two of the DWMP to inform our approach.

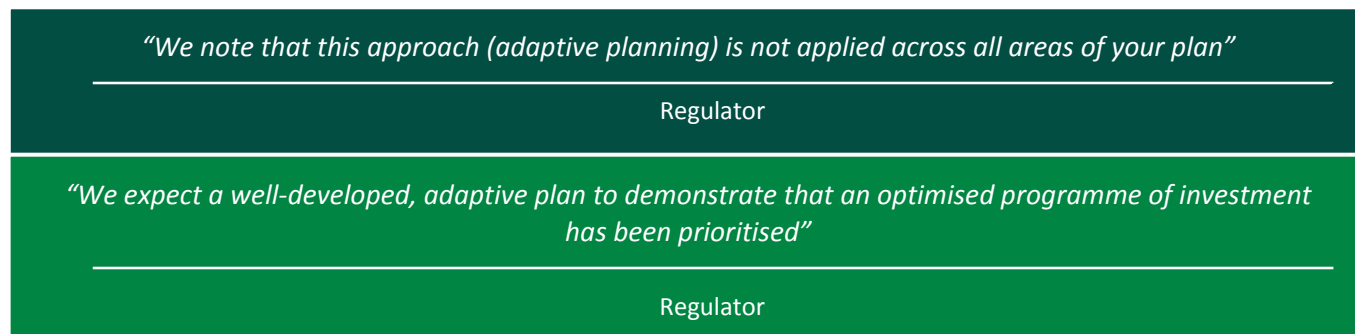
2.3.2.19 For more information on the steps we have taken between draft and final publication to address these comments please see:

- *Technical Appendix 8 – Programme Optimisation.*

2.3.3 Adaptive planning

- 2.3.3.1 In the feedback received from the draft consultation on adaptive planning, respondents reiterated the need for adaptive pathways across our optimised programme.
- 2.3.3.2 Figure 8 shows examples of the comments we received from respondents on adaptive planning. For the full list of comments received refer to Table 3 of Appendix A.

Figure 8 Examples of comments received on adaptive planning



- 2.3.3.3 We appreciate that the future could follow many different pathways, some of which could present new or changed challenges. Possible adaptive pathways are included within the Strategic Planning Area plans highlighting opportunities in the future across factors such as legislation changes, climate change, population growth, new technologies and partnership opportunities.
- 2.3.3.4 Additionally, adaptive plans are also being produced for pilot catchments within Place Based Planning (PBP) strategy and WINEP as well as for the business plan for investment cycle 2025–2030.
- 2.3.3.5 Between draft and final publication of the DWMP, a regional adaptive plan for DWMP has been developed and included in the Main Document.
- 2.3.3.6 For more information on the steps we have taken between draft and final publication to address these comments please see:
 - *Main Document.*

2.3.4 WINEP and legal obligations

- 2.3.4.1 In the feedback received from the draft consultation, regulators stated that the final DWMP “will need to fully reflect the requirement of the WINEP”. For final publication, we have continued to closely align the DWMP with the development of the WINEP and have taken steps to incorporate the WINEP into the final DWMP.
- 2.3.4.2 For more information on the steps we have taken between draft and final publication to address these comments please see:
 - *Main Document.*

3. Stakeholder engagement and partnership solutions

3.1 Introduction

- 3.1.1 The interconnected nature of different drainage and wastewater systems across the North West results in a multitude of interconnected issues for all environmental managers and drainage bodies. Working holistically and collaboratively is key to identifying integrated solutions and ways of working across organisations which support the delivery of drainage system-wide benefits. Throughout the process of developing the DWMP, we have worked with stakeholders to share progress updates, challenge and endorse approaches and to discuss and identify priority areas of shared risks thematically. We have developed a DWMP partnership opportunity pipeline for each catchment, identifying potential opportunities for co-delivery and co-funding.
- 3.1.2 In the DWMP, input from stakeholders resulted in:
- Incorporation of additional planning objectives, such as the impact of sewer flooding on highways and open spaces;
 - Amendments to our long-term targets to make them more ambitious and stretching;
 - Changes to the way we consider benefits assessment to incorporate wider environmental and social criteria; and
 - The development of a DWMP partnership opportunity pipeline with over 1,100 opportunities, which can be shared with stakeholders and will be incorporated into our plan for investment cycle 2025–2030 (AMP8³).
- 3.1.3 Between draft and final publication of the DWMP, we have carried out further engagement with stakeholders through our Strategic Planning Group workshops and the consultation process to understand stakeholders' views on our preferred plan to help inform and support the development of our final plan.
- 3.1.4 For more detail please refer to:
- *Technical Appendix 2 – Stakeholder engagement*

3.2 Consultation feedback

- 3.2.1 The majority of feedback on this theme was from regulators and stakeholders, and recognises the collective efforts made in developing the dDWMP. Additionally, respondents complimented our approach to engaging with Risk Management Authorities (RMA's) and other stakeholders and noted that we had made considerable efforts at each stage in the process (Figure 9).

³ The Asset Management Plan (AMP) period is a five-year time period used in the English and Welsh water industry. The periods are five-years in duration and begin on 1 April in the years ending in 0 or 5, for example AMP8 is the investment cycle 2025–2030.

Figure 9 Examples of positive feedback regarding stakeholder engagement and partnership solutions

“It is clear from the summary that the Strategic Planning groups have been very active and successful. We are particularly pleased to note that 1,164 partnership opportunities have been identified as a result of the 30 workshops it has hosted.”

Regulator

“UU has made considerable efforts to engage at each stage in the process and seemingly in an active and genuine way.”

Regulator

3.2.2 Respondents also raised some areas for improvement and the main themes that emerged from the responses were:

- Partnership solutions;
- Stakeholder engagement;
- Strategic Planning Area DWMPs; and
- Alignment with other long-term strategies.

3.3 Our response and action taken between draft and final publication to address feedback

3.3.1 Partnership solutions

3.3.1.1 In the feedback received from the draft consultation on partnership solutions, respondents wanted to see further detail and clarity on how we developed the partnership opportunity pipeline and what happens to any opportunities that were not identified as key opportunities for the DWMP. Respondents also requested to see specific details of the potential partnership opportunities and plans for how they would materialise.

3.3.1.2 Figure 10 shows examples of the comments we received from respondents on partnership solutions. For the full list of comments received refer to Table 5 of Appendix A.

Figure 10 Examples of comments received on partnership solutions

“It is hard to see how Key Priorities from other management plans have been considered and or reflected. Understanding this is crucial to knowing whether collaboration opportunities cited are correct. In figure 11, the Partnership Opportunities Pipeline, how was the original number narrowed to key opportunities?”

Stakeholder

“However, it is unclear to us at this stage whether these opportunities will materialise. In your final DWMP you should provide further detail on the likelihood of your partnership schemes going ahead, including timelines for delivery and the split in funding contributions, and be clear on the rationale for not progressing such schemes, where applicable”

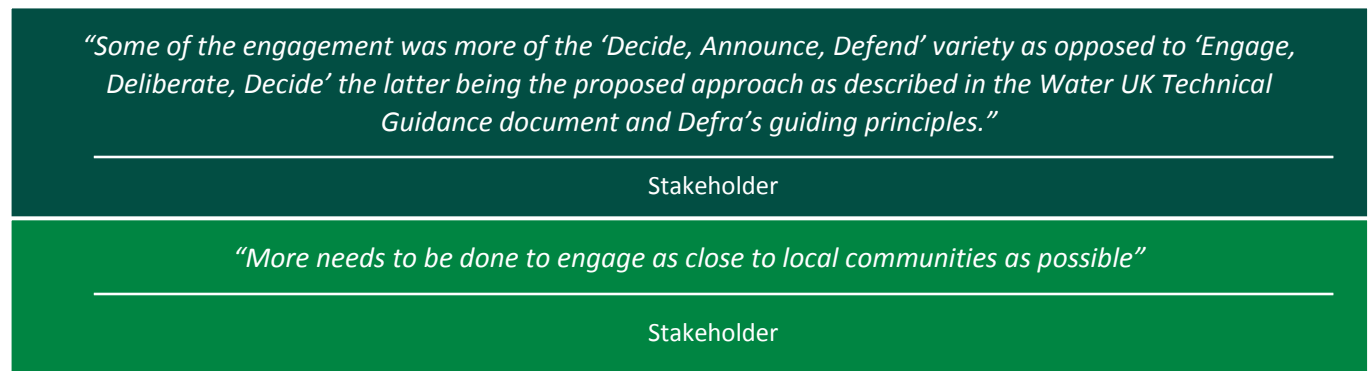
Regulator

- 3.3.1.3 Drainage systems and responsibilities across the North West are highly interconnected, and the integrated nature of the systems results in common issues across drainage asset owners and a co-dependence on their respective responsibilities being delivered. We recognise the importance of working in partnership and as an integral part of developing the DWMP we have engaged with a wide variety of stakeholders including the Environment Agency, Natural England, Lead Local Flood Authorities, Local Planning Authorities, Combined Authorities, Catchment Partnerships, environmental organisations such as the Rivers Trust and Groundwork, National Rail and National Highways. By working collaboratively, there is an opportunity to more fully understand these risks and issues, and work together to resolve issues at the root cause. The DWMP plays a key role in identifying potential partnerships and opportunities to work together.
- 3.3.1.4 The DWMP Partnership Opportunity Pipeline is a process for collating potential opportunities for working in partnership that has been co-developed with stakeholders through our SPG workshops.
- 3.3.1.5 Between January and March 2021, we held a series of SPG workshops to discuss the catchments within the North West, present our BRAVA results and document partners' risks as well as any potential opportunities to work collaboratively. Over 1000 potential opportunities were put forward by stakeholders which were then subject to an iterative screening process to identify the ones with greatest potential benefit to the DWMP objectives. For example, a number of partnership opportunities were suggested in areas where we have no assets.
- 3.3.1.6 This refined list of opportunities was presented back to the SPGs at a workshop for update, review and discussion. A number of these schemes have fed into Green Recovery schemes, the Fylde Hub and the Greater Manchester Integrated Water Management Plan. The remaining opportunities that did not make it into the key DWMP partnership opportunity process were captured in our organisation-wide partnership opportunity pipeline, where they are given due consideration alongside all other partnership opportunities. Both processes support the developing of partnerships for the next investment cycles (2025–2030 and beyond).
- 3.3.1.7 A key aim of the DWMP process is the identification and development of potential partnership opportunities. Due to the complex nature of partnership working, we are not able to fully commit to any partnerships identified through the DWMP without further investigation and funding decisions from the Price Review process and partnering organisations. It is therefore difficult to predict the likelihood of schemes progressing. However, through ongoing work, such as the development of our organisation-wide partnership framework, we plan to increasingly develop and use partnership solutions.
- 3.3.1.8 The success of our current and historic partnerships provides a solid starting point for continuing to develop new partnerships and deliver collaborative solutions for the future. The partnership framework sets out our approach to partnership working ensuring we have the key building blocks in place for successful collaboration. Alignment of our timelines with our stakeholders is also needed to provide certainty of investment in order for opportunities to come to fruition.
- 3.3.1.9 Between draft and final publication of the DWMP, we have taken steps to provide further clarity and detail on our approach to developing the DWMP potential partnership opportunities including a step-by-step methodology and case studies to show how partnership plays out in the catchment.
- 3.3.1.10 Throughout the development of the DWMP, stakeholders' support and engagement has allowed us to create a foundation for collaborating that we can continue to build on moving forwards into cycle two.
- 3.3.1.11 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Technical Appendix 2 – Stakeholder Engagement.*

3.3.2 Stakeholder engagement

- 3.3.2.1 In the feedback received from the draft consultation on stakeholder engagement, respondents wanted to see us engage further with our stakeholders between draft and final publication of the DWMP. Respondents also wanted to see more engagement with local communities regarding issues they are facing.
- 3.3.2.2 Figure 11 shows examples of the comments we received from respondents on stakeholder engagement. For the full list of comments received refer to Table 6 of Appendix A.

Figure 11 Examples of comments received on stakeholder engagement



- 3.3.2.3 We have continually engaged with stakeholders throughout the development of the DWMP, from setting the planning objectives, developing the options hierarchy and consulting on the draft and final preferred plans. The approach taken for engaging with our stakeholders followed the ‘Engage, Deliberate, Decide’ style proposed in the guidance, involving the use of independent facilitators, open discussions, MIRO boards and chat functions to share information, data and opinions with one another.
- 3.3.2.4 We have carried out further consultation workshops with stakeholders between draft and final publication which are detailed in the documentation. In addition to extensive stakeholder engagement, we have conducted customer research to ensure that the development of the DWMP reflects their needs and priorities. Striking the balance between sometimes opposing views can be difficult, and we have strived to tackle this as best we can.
- 3.3.2.5 Between draft and final publication, we have taken steps to outline the end to end stakeholder engagement process that we have completed throughout the development of the DWMP. We have also provided further detail on how we have worked with various organisation to identify synergies and work together. Additional case studies can be found in the documentation to highlight how and where we have worked with stakeholders.
- 3.3.2.6 We have carried out further consultation workshops with our stakeholders between draft and final publication to gain their insight and inform our final plan.
- 3.3.2.7 For this cycle of the DWMP, we have followed the framework in our approach to stakeholder engagement. The approaches taken towards stakeholder engagement in cycle one of the DWMP have established a strong foundation which will be built upon in future iterations of the plan. All of the feedback received will be given due consideration, to inform our approach as we progress towards cycle two of the DWMP.
- 3.3.2.8 For more information on the steps we have taken between draft and final publication to address these comments please see:
 - *Technical Appendix 2- Stakeholder Engagement.*

3.3.3 Strategic Planning Area DWMPs

- 3.3.3.1 In the feedback received from the draft consultation on the Strategic Planning Area (SPA) DWMPs, respondents wanted to see further detail for what the plans would look like in the short term and the changes they might see in the catchment. There were also a few specific responses addressing particular results in the SPA documents.
- 3.3.3.2 Figure 12 shows examples of the comments we received from respondents on Strategic Planning Area DWMPs. For the full list of comments received refer to Table 7 of Appendix A.

Figure 12 Examples of comments received on Strategic Planning Area DWMPs



- 3.3.3.3 The DWMP is a high-level, strategic plan which outlines the modelled risk of external pressures such as climate change and population growth on our systems and services over a 25 -year period. The DWMP is a decision support tool and will act as a signpost for where we may want to prioritise future investment and partnership working.
- 3.3.3.4 Due to the complex nature of partnership working, we are not able to fully commit to any partnerships identified through the DWMP without further investigation and funding decisions from the Price Review process. It is therefore difficult to predict the likelihood of schemes progressing, however, through ongoing work, such as the development of our organisation-wide partnership framework, we plan to increasingly develop and use partnership solutions.
- 3.3.3.5 As the DWMP utilises models and tools to forecast potential risk and opportunities, there will be a degree of uncertainty. This might result in locations that have not been identified as high risk through the DWMP assessments, however we have worked closely with our operational teams to ensure that local knowledge has been reflected. The potential risks and opportunities identified as part of the DWMP and wider business activities are continually reviewed and further investigations are undertaken where required.
- 3.3.3.6 Moving forwards, the DWMP will continue to be aligned with, and utilised within, the development of our strategies and other long-term plans to inform and support the development of the business plan for the next investment cycle (2025–2030). Our nearer-term plans have a higher degree of certainty and will provide the level of granularity and detail that can be used to deliver benefits across the North West.

- 3.3.3.7 The following sub-sections provide more detail on some of the particular locations raised during the consultation period:
Irwell SPA
- 3.3.3.8 The IWMP, which the Environment Agency, U UW and GMCA started to co-develop in September 2022 through the Trilateral Partnership, should help to move our organisations from operating in parallel within Greater Manchester to aligned and integrated to ensure outcomes and benefits for the place are maximised. The collation of capital programmes from numerous organisations to inform early opportunities for the IWMP has started to highlight locations where there may be a benefit to integrating planning and delivery between organisations. An opportunity specifically for the Environment Agency and U UW to explore integrating their activities has been identified within the Irwell catchment which has a focus on the sustainable management of surface water.
Staveley and Burneside
- 3.3.3.9 U UW recognises the problems faced at Staveley Wastewater Treatment Works and there are ongoing investigations into these. We are working closely with various organisations such as the Environment Agency and collaborating with the Lead Local Flood Authorities to develop a collaborative sustainable surface water removal plan to minimise the risks in the system. Staveley has also been identified as a location for the AMP8 driver which will meet less than ten spills per year by the end of the five-year period.
- 3.3.3.10 U UW recognises the risks faced in Burneside. We have a project to carry out improvements to the wastewater network in Burneside. We have recently achieved contract award status and are expecting to start on site in early 2024 dependent on gaining the relevant planning consents. This work will have the following requirements:
- (1) The design will take into account further development and demand in the wider Kendal catchment, as per the South Lakes District Council Development Plan;
 - (2) To resolve the combined sewer surcharging and causing hydraulic flooding of the area of Steeles Row; and
 - (3) Help protect the River Kent.
- 3.3.3.11 Between draft and final publication of the DWMP, we have updated our Strategic Planning Area DWMPs to reflect the further optimisation carried out on the preferred plan as well as additional information from the maturing on the WINEP and Place Based Planning projects. We have taken steps to provide further detail on how the DWMP may play out in the catchment through case studies and examples.
- 3.3.3.12 The Strategic Planning Area Plans have been developed in accordance with the framework for this cycle of the DWMP. The approaches taken have established a strong foundation which will be built upon in the future iterations of the plan. We have received feedback and recommendations that we have not been able to carry out actions for between draft and final publication due to time and resources available. All of the feedback received will be given due consideration, to inform our approach as we progress towards cycle two of the DWMP.
- 3.3.3.13 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Technical Appendix 2 – Stakeholder Engagement; and*
 - *Strategic Planning Area documents (SPA_01 – SPA_14).*

3.3.4 Alignment with other long-term strategies

- 3.3.4.1 In the feedback received from the draft consultation on alignment with other long-term strategies, respondents provided other suggestions on ways we could align and new plans that have emerged.
- 3.3.4.2 Figure 13 shows examples of the comments we received from respondents on alignment with other long-term strategies. For the full list of comments received refer to Table 8 of Appendix A.

Figure 13 Examples of comments received on alignment with other long-term strategies

“We would like our Plan to be included within your list of other strategic plans that you have considered your alignment with, as illustrated in figure 14 of your main document.”

Stakeholder

“It is unclear how the key priorities of Development Management Plans of the appropriate planning authorities have been taken into consideration. In the case of the National Parks (Lake District, Peak District and Yorkshire Dales) National Park Management Plans should also be considered along with their Local Plans.”

Stakeholder

- 3.3.4.3 Throughout the development of the DWMP, we have considered long-term plans across a range of organisations. We appreciate that new plans have emerged during this time which may not have been taken into account. When we begin cycle two of the DWMP, a full review of management plans will be undertaken.
- 3.3.4.4 U UW has taken steps to provide further information regarding the work with have done to align with other long-term plans across the region throughout the development of the plan, in particular detailing what we have done between draft and final publication.
- 3.3.4.5 For more information please refer to:
 - *Technical Appendix 2- Stakeholder Engagement.*

4. Customer acceptability

4.1 Introduction

- 4.1.1 Throughout the DWMP process, we have engaged with customers and stakeholders across the North West. Our customer engagement has influenced how options were prioritised and influenced the preferred plan. From the engagement, it was clear that customers care more now than ever about the environment and that climate change has been highlighted as a high priority concern.
- 4.1.2 Affordability is an important issue for many people in the region, with four in ten of the most deprived neighbourhoods in the country being within the North West. We have sought to identify the best value plan for our DWMP. While this is not necessarily the equivalent of lowest cost, it aims to strike a balance to keep bills as affordable as possible while continuing to provide and improve drainage and wastewater services now and in the future. The majority of the impact on the programme already affecting the bill is driven by statutory WINEP and overflow requirements. We are making use of phasing and adaptive planning to attempt to ensure that these statutory requirements are met in such a way that there is a balance of costs throughout the five-year investment cycle and so that the least regret measures are delivered first. Investigations are proposed ahead of actions that have uncertainty so any subsequent investment is of best value. We are actively seeking partnerships to aid in spreading the costs across responsible and/or benefiting parties. Nevertheless, there are significant tensions in trying to deliver a best value submission that is efficient, affordable and legally compliant with the requirements. We have a long track record of implementing a leading range of affordability support measures to help the lowest income households to afford their water charges. For example between 2020 and 2025, over £280 million of financial support will be made available to customers in the North West. However, we recognise that, even with these substantial levels of support, many homes in the North West will continue to find paying for water services a stretch.
- 4.1.3 The DWMP is a long-term, strategic plan setting out how we will continue to provide and improve wastewater services as we face significant challenges as a result of climate change and population growth. The plan has been developed from the assumption that existing operational and maintenance issues have been dealt with through base expenditure and that all assets are operating as designed. Base expenditure is the operating and maintenance costs that the company and therefore customers pay to keep the services running in its day-to-day operations and there is an expectation that the DWMP should not be used as a funding mechanism to resolve any existing issues that customers are already paying for in their bills. The DWMP accounts for any deterioration in the services that are as a result of external pressures such as climate change and population growth which will need to be dealt with through enhancement expenditure. Enhancement expenditure is the cost associated with the services needed to improve the performance of our system in the future, and will therefore result in increases to customers' bills.
- 4.1.4 Between draft and final publication of the DWMP, we have continued engagement with customers and have carried out customer acceptability testing on both the draft and final preferred plan.
- 4.1.5 For more information please refer to:
- *Technical Appendix 9 – Customer Engagement.*

4.2 Consultation feedback

- 4.2.1 We received positive feedback from regulators and stakeholders on the consideration of customer affordability and our approach to customer engagement. One of the regulators was encouraged to see that the company had shared an easy-to-understand customer summary. Stakeholders recognised the importance of engaging with customers and educating them on the issues and need for investment (Figure 14).

4.2.2 Results from the online survey showed that over 60 per cent of respondents agreed that further engagement is needed with customers around their views on planned service improvements, implications for future bills, and impacts of water bill affordability (Figure 15).

Figure 14 Examples of positive feedback regarding customer acceptability

“We acknowledge that you have provided the components of potential bill impacts by 2030 and 2050 for your region.”

Regulator

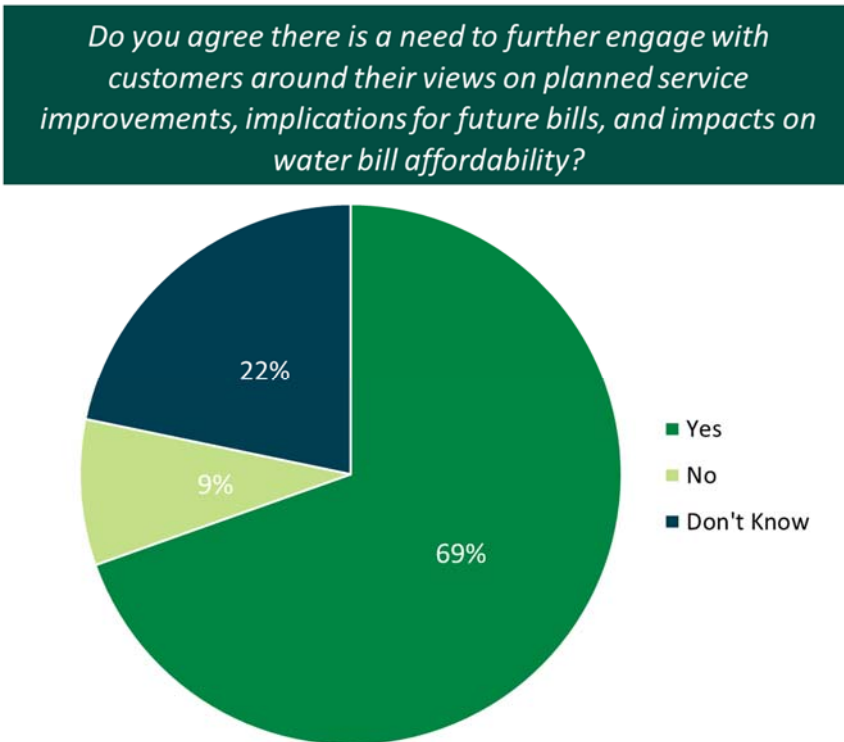
“We are therefore encouraged that the company provided an easy to understand summary of the draft plan and of the priority areas for this wider audience.”

Regulator

“Gaining support for larger bill increase will require clear demonstration of the benefits of investment. Such engagement will support any case you may make for different national funding regimes. ‘Levelling Up’ might be an appropriate consideration in respect of extra costs in the industrialised North West region.”

Stakeholder

Figure 15 Results from the online survey



4.2.3 Respondents also raised some areas for improvement and the main themes that emerged from the responses were:

- Bill impact and customer affordability;
- Customer views; and
- What is delivered through operating costs and maintenance investment (base) versus new capacity or new capability investment (enhancement).

4.3 Our response and action taken between draft and final publication to address feedback

4.3.1 Bill impact and customer affordability

- 4.3.1.1 In the feedback received from the draft consultation on bill impact and customer affordability, respondents wanted to see further engagement with customers on the bill impacts of the plan. Respondents also wanted further detail on our approach to bill impact and affordability of the plan as well as the steps we are taking to ensure there is phasing of the expenditure.
- 4.3.1.2 Figure 16 shows examples of the comments we received from respondents on bill impact and customer affordability. For the full list of comments received refer to Table 9 of Appendix A.

Figure 16 Examples of comments received on bill impact and customer affordability

“We did not see sufficient and convincing evidence that transparently sets out the costs required to address customers' priorities”

Regulator

“If customers are being expected to fund planned service improvements then it is important that they are fully engaged”

Regulator

- 4.3.1.3 Affordability is a hugely important issue for many people in the region as four in ten of the most deprived neighbourhoods in the country are in the North West. We have sought to identify a best value plan, and need to find a balance to ensure that bills remain affordable for our customers, now and in the future – especially as the statutory WINEP and overflow requirements drive the bulk of the investment needs.
- 4.3.1.4 Where possible, we are making use of phasing and adaptive planning to ensure statutory requirements are met in a way that balances costs across the five-year investment cycles and ensures delivery of the lowest-regret measures first.
- 4.3.1.5 Where there is uncertainty we are proposing investigations ahead of action so any subsequent investment can be best value. We are also actively seeking partnerships to help spread costs across responsible and/or benefitting parties.
- 4.3.1.6 Nevertheless, there are significant tensions in trying to deliver a best value submission which is efficient, affordable and legally compliant with the requirements. In the wider business we are also considering schemes that will offer support to customers least able to pay their bills.
- 4.3.1.7 Through the development of the DWMP we have set out to achieve a best value plan which balances the needs of our customers while considering the environment and investment to our infrastructure. The £8 per month by 2030 as highlighted in the draft DWMP is only an indicative cost not an overall bill increase. It is important to note that the bill impact shown excludes the impact of any rises in costs to goods, services and other bills such as inflation and that it is based on the information currently available to UUW and is subject to change in the future.

- 4.3.1.8 Customer engagement has been integral to the development of our best value preferred plan. Between draft and final publication of the DWMP, we have carried out customer acceptability testing on both our draft and final preferred plan which looks to gain insights on customers’ views on the choices we have made and looks at bill impacts associated with various scenarios including willingness to pay for different service enhancements. Further customer testing is being carried out ahead of the price review process to gain insight into customers’ views through a holistic lens, taking into account all aspects of the business and our services, not just drainage.
- 4.3.1.9 UUW has also taken steps to update our webpage and build on the materials made available for customers to learn about the DWMP and what the investment goes towards. We have provided further clarity and detail on our approach to bill impacts and affordability as well as including the bill impacts into the customer summary.
- 4.3.1.10 For more information on the steps we have taken between draft and final publication to address these comments please see:
 - *Technical Appendix 9 – Customer Engagement.*

4.3.2 Customer views

- 4.3.2.1 In the feedback received from the draft consultation on customer views, respondents wanted to see further engagement with our customers and further development of customer friendly documentation.
- 4.3.2.2 Figure 17 shows examples of the comments we received from respondents on customer views. For the full list of comments received refer to Table 10 of Appendix A.

Figure 17 Examples of comments received on customer views

“We would like to see the company develop these documents and webpages further in the final plan, notably to include likely bill impacts in the customer document and perhaps the use of videos and clips to make the plan easier to access and understand.”

Regulator

“Engagement with customers is vital to ensure that their views are considered, and they know why bills may have to increase to support a more sustainable future”

Stakeholder

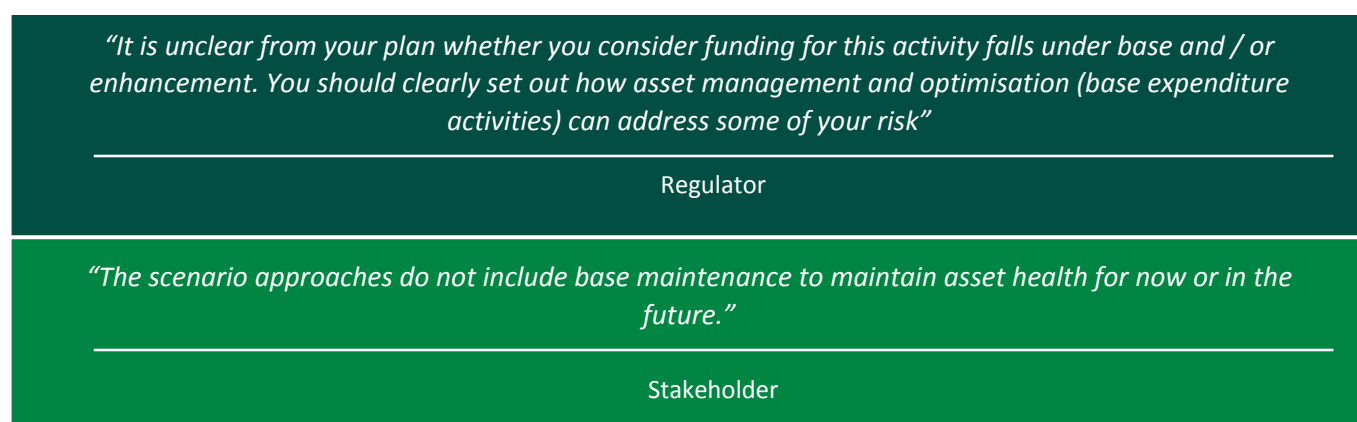
- 4.3.2.3 Throughout the development of the DWMP, we have utilised business-wide customer research, in addition to bespoke DWMP engagement. By taking this approach, we have ensured that the DWMP has been co-designed and co-created to accurately reflect customers’ needs and priorities. We have conducted bespoke research at key milestones to understand their views on areas such as long-term targets and ambitions, storm overflows, options development, and approaches to determining best value. We have provided a suite of customer friendly documentation such as the Customer Summary and the Non-Technical Summary to ensure accessibility to a wide range of customers.
- 4.3.2.4 Between draft and final publication, we have carried out further customer research into customers’ acceptability of both the draft and final preferred plans, including bill impacts, affordability and willingness to pay. We have also made updates to our customer summary and the customer friendly webpages to reflect any changes in the final plan.
- 4.3.2.5 The development of the DWMP is closely aligned with the development of the business plan for investment cycle 2025–2030 to ensure that we deliver benefits to customers and communities now and in the future.

- 4.3.2.6 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Non-Technical Summary;*
 - *Customer Summary; and*
 - *Technical Appendix 9 – Customer Engagement.*

4.3.3 Base versus enhancement

- 4.3.3.1 In the feedback received from the draft consultation on base and enhancement expenditure, respondents wanted to see further detail and clarity on our understanding of base and enhancement expenditure in the plan and how we have accounted for asset health.
- 4.3.3.2 Figure 18 shows examples of the comments we received from respondents on base versus enhancement. For the full list of comments received refer to Table 11 of Appendix A.

Figure 18 Examples of comments received on base versus enhancement



- 4.3.3.3 In our methodology for our DWMP we assumed a stable service position for modelling which was used to drive the proposed optimised programme. This therefore assumes that assets are operating as designed and thus deterioration seen is due to the changing environment and/or as a result of new statutory requirements. Additionally, a number of base activities were identified within the DWMP as a solution to mitigate some of the risk, for example: customer education activities, and Dynamic Network Management (DNM). The majority of identified solutions were classed as enhancement activities as they were addressing external factors such as climate change and/or new statutory requirements or straightforward needs to increase asset capacities.
- 4.3.3.4 For more information on the steps we have taken between draft and final publication to address these comments please see:
- Technical Appendix 8 – Programme Optimisation

5. Storm overflows

5.1 Introduction

- 5.1.1 At the time of publication of the dDWMP, Defra’s Storm Overflow Discharge Reduction Plan (SODRP) was in the consultation phase so there was a degree of uncertainty on expectations. With this in mind, our dDWMP set out around £18.3 billion to target storm overflow performance, advising that this could increase to £25.9 billion to deliver additional natural and social capital benefits alongside increased resilience.
- 5.1.2 We outlined within our draft plan that a review would be required between draft and final DWMP in order to assess and optimise requirements from the final SODRP which was published in August 2022.
- 5.1.3 Between draft and final publication of our DWMP, we have carried out further optimisation of our storm overflow programme in line with the most recent WINEP programme and the SODRP guidance.
- 5.1.4 For more information please refer to:
 - *Main Document.*

5.2 Consultation feedback

- 5.2.1 Feedback was relatively neutral from both regulators and stakeholders as they acknowledged the work we had done to set out a future plan for storm overflows. It was encouraging to see that there is overall support for the step change that is required in order to improve storm overflow performance and the associated benefits that this can bring across the North West (Figure 19).

Figure 19 Examples of positive feedback regarding storm overflows

“We acknowledge that you have provided your provisional view and set out the storm overflows cost separately in your dDWMP”

Regulator

- 5.2.2 The emerging themes from the feedback were:
 - Timescales, milestones and costs; and
 - Water quality monitoring.

5.3 Our response and action taken between draft and final publication to address feedback

5.3.1 Timescales, milestones and costs

- 5.3.1.1 In the feedback received from the draft consultation on the timescales, milestones and costs for storm overflows, respondents wanted to see further detail on our ambition and how we intend to achieve our targets set out. Respondents expected us to incorporate the SODRP targets into our final plan. Respondents also wanted to see further detail on how we have developed our approach to storm overflows.

- 5.3.1.2 Figure 20 shows examples of the comments we received from respondents on timescales, milestones and costs for storm overflows. For the full list of comments received refer to Table 12 of Appendix A.

Figure 20 Examples of comments received on timescales, milestones and costs for storm overflows

“We expect to see a more detailed and robust timeline (showing milestones and prioritisation) and evidence on the costs for these storm overflow schemes in your final DWMP.”

Regulator

“We expect your final plans to incorporate all the required storm overflow targets and clearly set out how these will be delivered with the right best value solutions”

Regulator

- 5.3.1.3 We recognise the importance of reducing the number of spills from storm overflows which is why we have already committed to delivering £230 million in environmental improvements, supporting at least a one-third sustainable reduction in the number of spills recorded from our storm overflows by 2025 compared to the 2020 baseline as part of our Better Rivers: Better North West commitments.
- 5.3.1.4 The North West has a higher number of combined sewers and storm overflows in comparison to other areas. The Victorian legacy of the combined systems, the region’s propensity for high and flashy rainfall and higher levels of urban run-off exacerbate the issues we face. Due to the interconnected nature of our drainage systems, we must also work with other risk management authorities to ensure we are working together to all do our part to reduce the volume of water entering the sewers as part of our rainwater management strategy.
- 5.3.1.5 In order to achieve the ambitious targets and time frames set out in the SODRP, we will need to build additional grey storage solutions as these targets cannot be achieved using blue-green solutions alone.
- 5.3.1.6 The dDWMP included the 25-year pathway to achieving storm overflow targets, and the phasing to achieve the SODRP proposed timing and has been closely aligned with the development of the WINEP which is the delivery route for storm overflow improvements. A key element of the WINEP development is maximising blue-green opportunities.
- 5.3.1.7 Between draft and final publication of the DWMP, we have carried out further optimisation of our preferred plan to fully reflect alignment with the WINEP submission and the SODRP. We have also carried out further customer acceptability testing on the draft and final plans, including on the affordability of bills, to ensure that customers’ views are fully reflected in our final plan.
- 5.3.1.8 The final plan has incorporated a significantly higher amount of green solutions and where we have not used green solutions, we have provided clear justification and reasoning for our choices. We have also taken steps to provide further clarity and detail on our approach to addressing storm overflows as well as the targets and how they will be delivered.
- 5.3.1.9 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Main Document.*

5.3.2 Water quality monitoring

- 5.3.2.1 In the feedback received from the draft consultation on water quality monitoring, respondents requested further detail on the work currently ongoing as well as further information on milestones and timescales.
- 5.3.2.2 Figure 21 shows examples of the comments we received from respondents on water quality monitoring. For the full list of comments received refer to Table 13 of Appendix A.

Figure 21 Examples of comments received on water quality monitoring

“We would also welcome more detail on monitoring requirements for overflows, including 100 per cent EDM coverage by the end of 2023, near real time reporting of EDM and continuous water quality monitoring requirements.”

Regulator

“We note that you have acknowledged the requirements of undertaking water quality monitoring and that you plan to review this element further in your final DWMP. As your dDWMP submission does not include evidence on how this will be achieved, we are unclear on the scale of the requirement and your ambitions to deliver it. Therefore, you should provide detailed evidence on your approach and milestones to achieve this requirement as part of your final plan”

Regulator

- 5.3.2.3 We recognise the importance of river and water quality across the North West and we want to build trust and confidence that we are addressing concerns and making our contribution to improving river health. This is why we have created a dedicated project, ‘Better Rivers: Better North West’, which aims to tackle the issue, covering asset improvement, enhanced data monitoring and sharing, greater innovation and more use of nature-based solutions.
- 5.3.2.4 Our commitments through the project include:
 - Actively engaging and listening to all our stakeholders to demonstrate we are taking action;
 - Seeking engagement and support in the creation of our future plans;
 - Providing greater transparency of our performance and the issues to be tackled; and
 - Engaging with community groups who value access to water for recreational purposes to identify priority locations.
- 5.3.2.5 Through the project, we have committed to having 100% Event Duration Monitoring (EDM) coverage of overflows by 2023. We are currently on target to have 100% EDM by 2023, with 90% complete and the remaining due to be completed in 2023. Real time spill reporting is due to be released on a geospatial portal which will be rolled out publically post April 2023. This portal will provide the granularity that regulators are seeking.
- 5.3.2.6 We are determined to build a coalition of the willing to improve North West river water quality and catalyse action from many parties. At the heart of this will be highlighting the importance of addressing surface water management at scale and that continued investment in effective end-to-end wastewater management is necessary to improve river water quality.

- 5.3.2.7 Further information on our commitment to improving river health through the Better Rivers: Better North West project can be found on our website (<https://www.unitedutilities.com/corporate/responsibility/environment/reducing-pollution/storm-overflows/our-commitments-to-river-health/>).
- 5.3.2.8 Water quality monitoring is a requirement of the Environment Act 2021 and is a key driver for the WINEP programme. The DWMP is closely aligned with the both development of the WINEP and our business plan for investment cycle 2025 – 2030.
- 5.3.2.9 At the time of DWMP publication, the government’s proposal to enhance the monitoring of storm overflows and final effluent discharges into watercourses was in a consultation phase which closed on 23 May 2023. Further guidance is expected in July 2023 so the DWMP is unable to provide further information at this time.
- 5.3.2.10 More information on our ambitions to tackling water quality will be available in autumn 2023 as part of our business plan submission.
- 5.3.2.11 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Statement of Response.*

6. Wider strategic ambition of the DWMP

6.1 Introduction

- 6.1.1 The purpose of the DWMP is to continue to provide a plan for efficient, effective and resilient wastewater services to the customers in the North West at an affordable price, now and in the future. The ambition of the DWMP is to facilitate a better future for the North West, so we need targets and goals to work towards and assess progress towards achieving. This was done by developing long-term objectives, also referred to as planning objectives (Figure 22).
- 6.1.2 Our ambitions include accounting for the impacts of climate change, prioritising low-carbon and nature-based solutions, considering the impact on the natural environment, water quality and biodiversity as well as the consideration of system resilience.
- 6.1.3 For more information please refer to:
 - *Statement of Response.*

Figure 22 Overview of the DWMP planning objectives

Planning objective	 We will provide excellent wastewater services, reducing our impact on the environment	 We will protect, restore and improve the natural environment of the North West through our actions	 We will sustainably reduce the risk of sewer flooding in the North West
Metric	Wastewater Quality Compliance Pollution Incidents	Storm Overflow Performance Environmental Obligations (WINEP)	Internal Flooding External Flooding Flooding of Open Spaces Sewer Collapses Risk of 1:50 Year Storm

6.2 Consultation feedback

- 6.2.1 We received positive feedback from both regulators and stakeholders on the consideration of wider strategic and environmental outcomes. Regulators commended our additional bespoke planning objectives and stated that climate change and carbon were largely well covered. Stakeholders also acknowledged, supported and welcomed the dDWMP approaches and aspirations on climate change and environmental investment (Figure 23).

Figure 23 Examples of positive feedback regarding the wider strategic ambition of the DWMP

“The issue of climate change and how to plan for it is largely well covered in Technical Appendices 5 (Assessing Future Risk) and 6 (Resilience), including associated risks, and how carbon is accounted for in future options.”

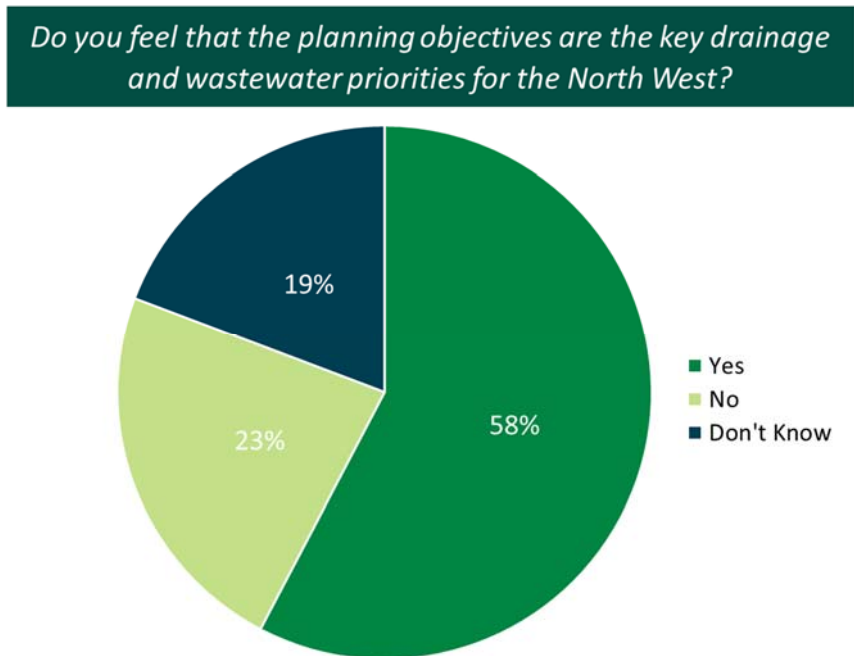
Regulator

“We commend the specific engagement sessions that UU held to explore and finalise the additional bespoke planning objectives.”

Regulator

6.2.2 Results from the online survey showed that 58 per cent of respondents agreed that the DWMP planning objectives are the key drainage and wastewater priorities for the North West (Figure 24).

Figure 24 Results from the online survey



6.2.3 Areas for improvement raised by respondents can be summarised into the following themes:

- Planning objectives;
- Data and methodologies for assessing the risk;
- Water quality;
- Strategic Environmental Assessments (SEA); and
- Other considerations of the DWMP.

6.3 Our response and action taken between draft and final publication to address feedback

6.3.1 Planning objectives

6.3.1.1 In the feedback received from the draft consultation on our planning objectives, respondents provided suggestions for other key priorities to consider in the development of our targets and reflected on the objectives used for this cycle of the DWMP.

6.3.1.2 Figure 25 shows examples of the comments we received from respondents on planning objectives. For the full list of comments received refer to Table 14 of Appendix A.

Figure 25 Examples of comments received on the planning objectives

“We are surprised that the stakeholder engagement resulted in only two additional bespoke planning objectives.”

Regulator

“Discussion of the bespoke planning assessments with stakeholders would have been beneficial and would most likely have led to their more formal adoption as objectives.”

Regulator

- 6.3.1.3 We have worked extensively with customers and stakeholders to understand the challenges we face collectively. When developing the planning objectives, we conducted bespoke research to understand customers’ general priorities in terms of services and more in-depth research to deep dive on important but complex topics such as sewer overflows.
- 6.3.1.4 Additionally, the planning objectives were extensively tested with stakeholders during workshops held in 2019. This exercise allowed us to test how stretching the objectives were and ensured that the objectives covered the breadth of different wastewater issues.
- 6.3.1.5 The outcome of this engagement allowed us to develop joint planning objectives for the North West which set out our performance aims across three key themes in our wastewater service delivery:
- (1) Collecting, treating and recycling wastewater;
 - (2) Protecting, restoring and improving the natural environment; and
 - (3) Sustainably reducing the risk of sewer flooding.
- 6.3.1.6 The engagement also resulted in the creation of two bespoke planning objectives, external sewer flooding and flooding of open spaces.
- 6.3.1.7 The planning objectives were used with the Baseline Risk and Vulnerability Assessment (BRAVA) stage of the DWMP process to understand how future changes might impact on our ability to achieve the associated target. As this was one of the first stages of the DWMP process, we recognise that priorities and needs change over time, and that there may be new and emerging risks and opportunities that are not fully reflected within this iteration of the DWMP.
- 6.3.1.8 The planning objectives and long-term targets will be further developed in future cycles of the DWMP to ensure alignment with the business planning process and to ensure that stakeholder and customer priorities are reflected.
- 6.3.1.9 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Main Document.*

6.3.2 Data and methodologies for assessing the risk

- 6.3.2.1 In the feedback received from the draft consultation on data and methodologies for assessing the risks, respondents had suggestions for alternative ways to approach the DWMP and suggestions for methodologies in cycle two.
- 6.3.2.2 Figure 26 shows examples of the comments we received from respondents on data and methodologies for assessing the risk. For the full list of comments received refer to Table 15 of Appendix A.

Figure 26 Examples of comments received on data and methodologies for assessing risk



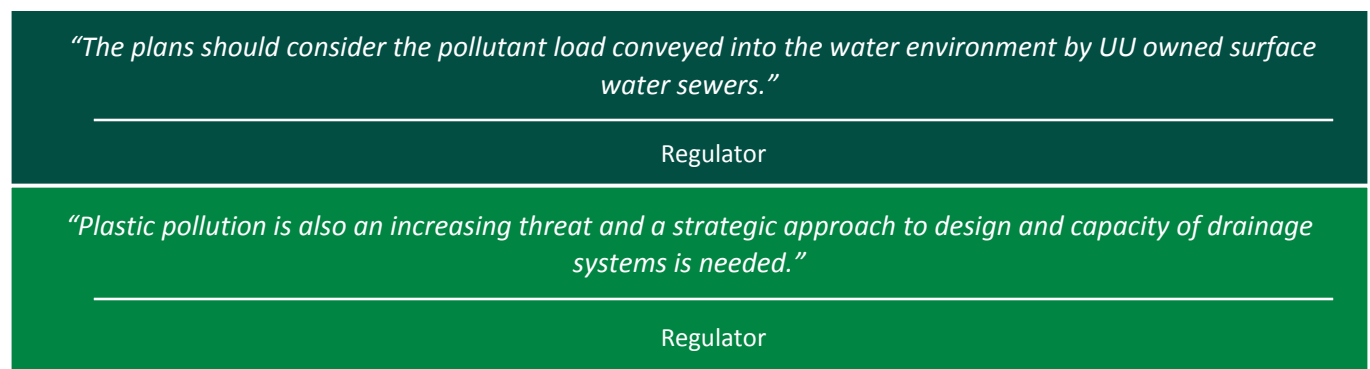
- 6.3.2.3 For this cycle of the DWMP, UUW has followed the framework set out to us making use of the best available data at the time of analysis. At the time of undertaking the BRAVA assessments, the 2017 UKWIR data was the best and most recent available to us. For more information on our approach to modelling the risks please see TA5 – Assessing Future Risk. For cycle two, we will make use of the more recently published Future Drainage and 2022 UKWIR projects to inform climate change. UUW carried out a series of resilience assessments to look at other risks that interact with our systems - some of these were prescribed to us as per the framework, however, we also identified bespoke assessments we considered important to assess.
- 6.3.2.4 Across the North West, there are two groundwater bodies that are assessed as failing to meet good status due to the ‘water industry’, both of which are within Drinking Water Protected Areas already. We take the responsibilities to the natural environment seriously and aim to minimise the risk of activities wherever practicable.
- 6.3.2.5 There is a robust and certified drinking water safety plan approach which assesses the risks to groundwater sources. These are carried out in detail for each source detailing the potential risks and understanding any potential pathways to the aquifer, so that appropriate control measures can be put in place to minimise the risk of deterioration of these sources. A monitoring programme has been established to verify the quality of the sources which supports the risk assessments.
- 6.3.2.6 We work with a number of stakeholders including the Environment Agency, landowners and tenants to ensure that the sources are protected and that appropriate actions are in place through, for example, safeguard zones, should additional measures be required.
- 6.3.2.7 The 2017 UKWIR project ‘Rainfall Intensity for the Design of Sewerage Systems’ was the basis of all climate change rainfall used in BRAVA. In 2020, when this analysis was carried out, this was the best available data source and industry-leading approach. We utilised the central estimates for design rainfall as these were seen to be the more reasonable estimates. High estimates were used for Extended BRAVA. For cycle two, we will make use of the more recently published Future Drainage and 2022 UKWIR projects to inform climate change.

- 6.3.2.8 The 2050 planning horizon aligns to the timelines suggested in the DWMP framework. We are undertaking a long-term strategy assessment which looks further into the future.
- 6.3.2.9 Our methodological approaches have established a strong foundation which will be built upon in future iterations of the DWMP. While long-term planning for wastewater services is not new, this is the first time we have produced a DWMP. The DWMP will be renewed on a five-yearly basis so it is therefore not a static programme but is a process that will continue to evolve over time.
- 6.3.2.10 We thank the respondents for their suggestions for improvements to data and methodologies. As we approach cycle two of the DWMP, we will be reviewing all recommendations to ensure these are considered as we carry out lessons learnt exercises and plan for the next iteration of the DWMP.
- 6.3.2.11 For more information on the steps we have taken between draft and final publication to address these comments please see:
 - *Statement of Response.*

6.3.3 Water quality

- 6.3.3.1 In the feedback received from the draft consultation on water quality, respondents emphasised the importance of considering water quality throughout our plan. Responses also included other factors that we could consider in our assessments to address water quality issues. There were a number of respondents who addressed specific issues faced at named locations such as the Lake District.
- 6.3.3.2 Figure 27 shows examples of the comments we received from respondents on water quality. For the full list of comments received refer to Table 16 of Appendix A.

Figure 27 Examples of comments received on water quality



- 6.3.3.3 UUW recognises the importance of improving and protecting the natural environment and we are doing more than ever before to protect and enhance rivers and water bodies which support aquatic habitats.
- 6.3.3.4 We take our role in protecting them very seriously so they can be enjoyed by all. We have invested significantly to reduce the impact that wastewater has on the natural environment and our long-term ambition is to eliminate pollution incidents. The Environment Agency tightly controls what we can discharge back to the water environment. If something goes wrong and there’s a blockage, burst or power failure, the monitoring that we have in place detects it and we’re quick to act, reporting the pollution incident to the Environment Agency and minimising the impact as soon as possible.
- 6.3.3.5 Our performance in 2022 means we have already met our target to reduce the number of storm overflow spills by at least one third by 2025, compared to the 2020 baseline. While this is one of the commitments in our Better Rivers: Better North West plan, there is much more to be done – hence the hugely ambitious plans to reduce storm overflows in our WINEP plan. In the meantime, we continue to take action and since 2020, we have been investing to reduce how often our storm overflows operate and delivered a 39 per cent reduction in spill numbers, 41 per cent reduction in spill duration and 41 per cent reduction in the average annual spill frequency. We care passionately about the customers, communities and environment we serve so we know there’s more still to do. From 2025 we will be

delivering our largest ever environmental programme to re-plumb the North West's drainage network and tackle every high-spilling overflow, protecting rivers across our region.

- 6.3.3.6 We recognise the importance of the impact of surface water sewers on the water environment and are considering the impacts in the wider business through our ongoing contaminated surface water (CSW) programme, where we investigate sources of misconnections in the catchment where outfall sampling has indicated that contaminated surface water is present.
- 6.3.3.7 Due to the interconnected nature of surface water sewers there is a responsibility for Local Authorities, Highways and ourselves to work collaboratively to tackle the issues we face together. The DWMP provides an opportunity and forum for us to work in partnership which will continue into cycle two.
- 6.3.3.8 U UW recognises the risk that plastics impose on our systems and the environment, this is why we are working hard on our 'Stop the Block' campaign. We are tackling the harm to local wildlife and habitats along riverbanks which is caused by products, such as wet wipes, through our 'Stop the Block' campaign. This communications programme encourages people to put wet wipes in the bin and keep them out of the drainage network altogether. We promote this key message at a regional and local level, from radio, press and digital advertising to working in partnership with communities to reduce the impact of these products on watercourses. As a society, it is vitally important that we increase our understanding of micro-plastics pollution, allowing us to develop meaningful solutions to tackle this significant issue – and U UW is already working with others to address the problem. There are multiple sources of micro-plastic pollution and U UW is currently investigating the impact of our wastewater treatment plants on the river to give a much more holistic understanding of the sources, pathway and consequences of micro-plastics in the environment. Only through collaboration and cooperation can this issue be tackled successfully.
- 6.3.3.9 As part of the DWMP resilience assessments, we have investigated the risks to water quality through watercourse dilution, land use change and outfall locking. For more information please refer to *Technical Appendix 6 – Resilience*.
- 6.3.3.10 It is important to note that the DWMP is a high-level, strategic plan that sets out how we will maintain robust and resilient wastewater services as we face the impacts of external pressures, such as climate change and population growth, across our systems. The DWMP is based on modelled data which will be improved throughout the iterations of the DWMP as we collect more information and data from the here and now issues ongoing. For this cycle of the DWMP, U UW has followed the framework set out to us making use of the best available data at the time of analysis. As we approach cycle two, all the feedback received will be reviewed and given due consideration.
- 6.3.3.11 The following sub-sections summarise feedback on specific areas:
- [Lake District](#)
- 6.3.3.12 U UW is committed to improving water quality across the Lake District, particularly in Windermere, which is why we are committed to carrying out further investigations into the sources of pollution and the solutions required so that we can continue to support and make improvements across the catchment in a holistic, catchment-based approach.
- 6.3.3.13 Improvements in catchment-based partnership working, as well as gathering data and evidence, are key to driving the best solutions at the appropriate locations for change. We will continue to support and make improvements across the catchment through a holistic, catchment-based approach.
- 6.3.3.14 It is important to note that the quality of water across Windermere differs. Windermere has four designated bathing water sites, all of which have been rated excellent consistently for the past seven years. Windermere is a complex catchment and while wastewater outputs do contribute to some water quality issues, there are multiple sources across the catchment that can play an even more significant role. For example, currently over 60 per cent of phosphorus inputs into the Lake come from other sources. U UW has invested in assets around Windermere over the past 30 years and we now treat wastewater to the highest standard possible. Between 2015 and 2020 our £45 million investment has reduced our phosphorus input by over 15 per cent.

6.3.3.15 To go further, there needs to be a collaborative approach across multiple sectors to drive holistic, catchment-based improvements. UUW is committed to playing its part in a much wider plan to make improvements to water quality and we are proud to be a member of the Love Windermere partnership, playing an active role in developing good working partnerships.

Burneside

6.3.3.16 The DWMP is a high-level, strategic plan that aims to understand where risks may emerge over the next 25-years as a result of external pressures such as climate change and population growth. The DWMP does not focus on the here and now issues raised within this response, however, the business has other ongoing activities that are looking into the risks raised. UUW is currently in preparation for a project to carry out improvements to the wastewater network in Burneside. We have recently achieved contract award status and are expecting to start on site in early 2024 dependent on gaining the relevant planning consents.

6.3.3.17 This work will have the following requirements:

- (1) The design will take into account further development and demand in the wider Kendal catchment, as per the South Lakes District Council Development Plan;
- (2) To resolve the combined sewer surcharging and causing hydraulic flooding of the area of Steeles Row; and
- (3) Help protect the River Kent.

6.3.3.18 For more information on the steps we have taken between draft and final publication to address these comments please see:

- *Statement of Response.*

6.3.4 Strategic Environmental Assessments (SEA)

6.3.4.1 In the feedback received from the draft consultation on the Strategic Environmental Assessments, respondents wanted to see “more detail on the mitigation measures”. For the full list of comments received refer to Table 17 of Appendix A.

6.3.4.2 We have undertaken Strategic Environmental Assessments to ensure that the likely significant environmental effects of plans and programmes are identified, measures developed to avoid, manage or mitigate any significant adverse effects, and to enhance any beneficial effects.

6.3.4.3 As the DWMP is a high-level, strategic plan and provides an overview of the potential interventions that could be introduced to deliver benefits across the North West, further environmental assessments will be undertaken as and when individual projects, schemes and interventions become certain to ensure that there is no detrimental impact to the environment.

6.3.4.4 For more information on the steps we have taken between draft and final publication to address these comments please see:

- *C004 DWMP Strategic Environmental Assessment (SEA): Environmental Report Post Adoption Statement.*

6.3.5 Other considerations of the DWMP

6.3.5.1 In the feedback received in the draft consultation, we received feedback regarding other considerations of the DWMP. Respondents largely focused on our approach to considering climate change and other areas of interest that the DWMP might consider in future iterations, such as habitats.

- 6.3.5.2 Figure 28 shows examples of the comments we received from respondents on other considerations of the DWMP. For the full list of comments received refer to Table 18 of Appendix A.

Figure 28 Examples of comments received on other considerations of the DWMP



- 6.3.5.3 In accordance with the DWMP framework, we have used industry-leading models and the most recent data to ensure we are developing the best plan possible. Throughout the development of our preferred plan, upstream management and green solutions have been prioritised through our options hierarchy approach to ensure we are tackling problems at source. The DWMP is an active and cyclical planning tool which will be revisited every five-years. As we approach cycle two of the DWMP, all feedback will be reviewed and given due consideration. We have conducted numerous resilience assessments assessing risks to the region across aspects such as power loss and outfall locking. More detail can be found in TA6 – Resilience.
- 6.3.5.4 Additionally, as detailed in TA8 – Programme Optimisation, U UW carried out sensitivity testing through running numerous scenarios including low and high climate change. It is worth noting that the baseline used for all of our assessments utilised current verified models and assumed a stable asset base. U UW has developed the DWMP in accordance with the framework which sets out a 25-year planning horizon. Throughout the development process, we have worked hard to engage with customers and stakeholders to ensure their needs and priorities are reflected in our final preferred plan.
- 6.3.5.5 We are closely aligned with the WRMP and WINEP to ensure that we are approaching the development of the DWMP holistically. Additionally, we are developing long-term strategies which include the creation and development of adaptive plans.
- 6.3.5.6 The DWMP has also implemented our 'Systems Thinking' approach which aims to understand and plan with the wider system characteristics in mind to ensure we are not working in silos.
- 6.3.5.7 We recognise the importance of looking at our systems holistically and understanding how they interact with the natural environment. Catchment Systems Thinking (CaST) is U UW's approach to managing catchments in a holistic, integrated manner. As a custodian of the natural environment, with 56,000 hectares of land in the North West, U UW has applied catchment-based approaches on our land to deliver environmental and water quality improvements for many years. We want to continue to manage water in a holistic manner to understand the impact of our activities on the environment more broadly.
- 6.3.5.8 The CaST approach encourages us to think differently and goes beyond our catchment land to look at the wider environment. Key elements of the CaST approach includes incorporating natural capital decision making to consider what is best for the environment, customers and communities by integrating risks and driving multiple natural capital benefits, and developing better ways of working through co-governance, collaboration and partnerships.
- 6.3.5.9 We cannot improve the water environment on our own. Only by working in partnership with others can we deliver for water, wildlife and local communities. In 2022, we committed to two major partnerships aimed at improving the environment of the North West. Our ground-breaking strategic partnership with The Rivers Trust aims to tackle the big challenges facing rivers in the region. It is the first time a

partnership has set about designing a framework to bring together everyone with an interest in the health of rivers from source to sea.

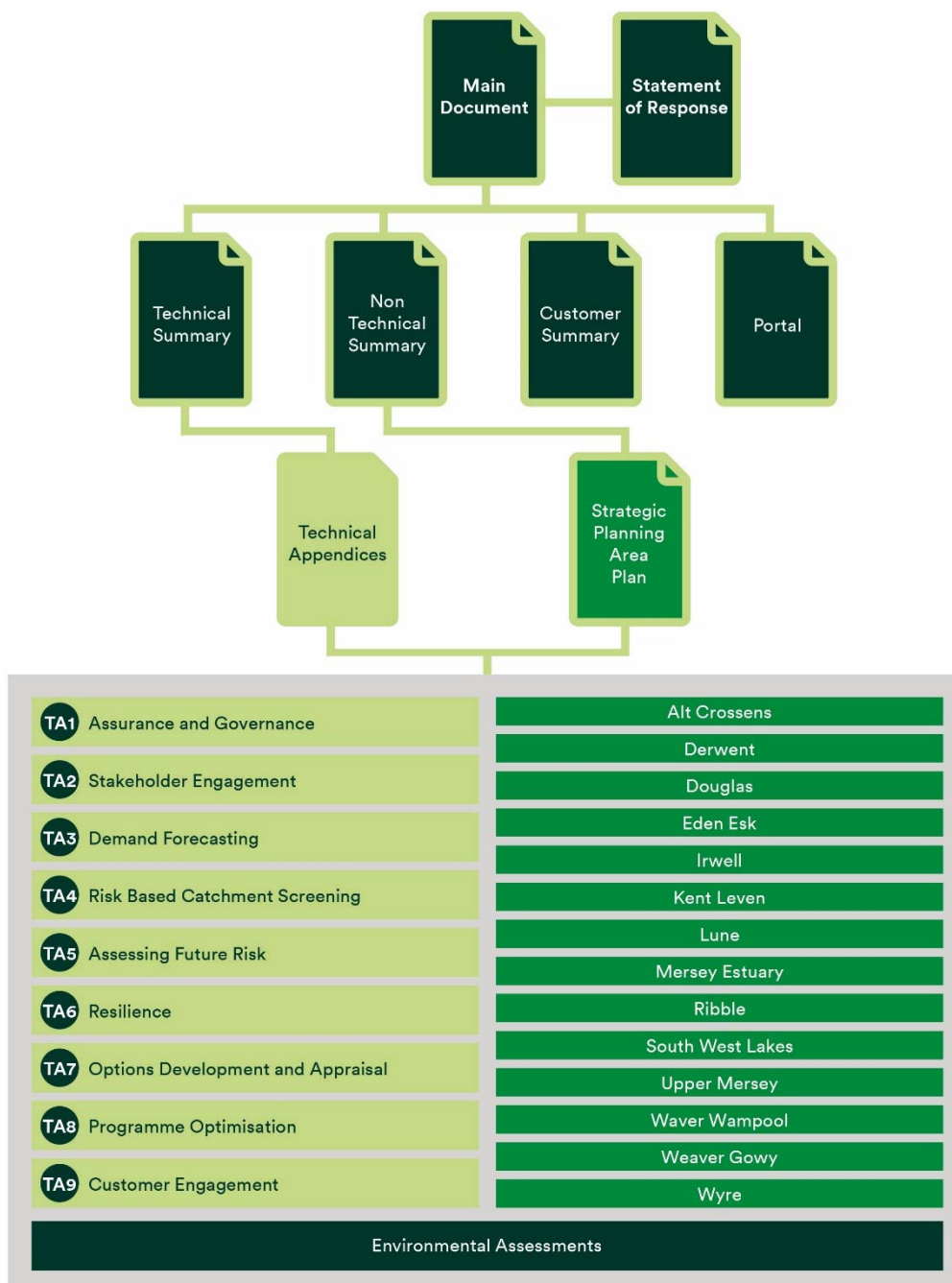
- 6.3.5.10 While long-term planning for wastewater services is not new, this is the first time we have produced a DWMP. The DWMP will be renewed on a five-yearly basis and is therefore not a static programme. Between draft and final publication of the DWMP, we have taken steps to incorporate and act on draft consultation feedback wherever possible to inform our fDWMP. In some cases, we were unable to carry out actions between draft and final publication due to time constraints and resources available. All of the feedback received will be given due consideration, to inform our approach as we progress towards cycle two of the DWMP.
- 6.3.5.11 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Main Document; and*
 - *Statement of Response.*

7. DWMP document structure and content

7.1 Introduction

- 7.1.1 As part of the dDWMP, over 25 documents were published (Figure 29) on our corporate website. We also published a supporting letter from the CEO, a Board Assurance Statement, three Strategic Environmental Assessment (SEA) reports, and provided access to our customer geospatial portal (<https://www.unitedutilities.com/corporate/about-us/our-future-plans/Our-long-term-plans/dwmp-portal/>). Our ambition was to provide documentation for a range of readers, for example, providing the ‘Strategic Planning Area Plans’ for more local information or the ‘Customer Summary’ as an easy-to-read overview of the dDWMP.
- 7.1.2 For our final publication, we have taken steps to streamline some of our documentation and update our webpage to provide further educational materials that are accessible to a wide range of users.

Figure 29 Summary of the DWMP documents



7.2 Consultation feedback

7.2.1 We received a number of positive responses on the dDWMP document. Several regulators complimented us on the structure and content of the dDWMP with particular mention of our customer geospatial platform. They welcomed our approach to consultation and acknowledged the steps that had been taken to achieve board assurance. Stakeholders were also complimentary of suitable graphics and explanation for many elements as well as the customer geospatial portal which was readily accessible (Figure 30).

Figure 30 Examples of positive feedback regarding the DWMP document structure and content

“We also note that as well as providing a DWMP geospatial platform (GSP) “stakeholders were provided with a training pack and the offer of one to one sessions, to demonstrate how to use GSP. Partners are encouraged to feed back their experience with using GSP”. This indicates a willingness to adapt engagement tools to suit the needs of stakeholders.”

Regulator

“We are pleased to see that United Utilities has produced a comprehensive and easy to read DWMP. We are in broad agreement with the principles and approach outlined in the Plan, and support the adaptive approach suggested by the company to address current and future challenges.”

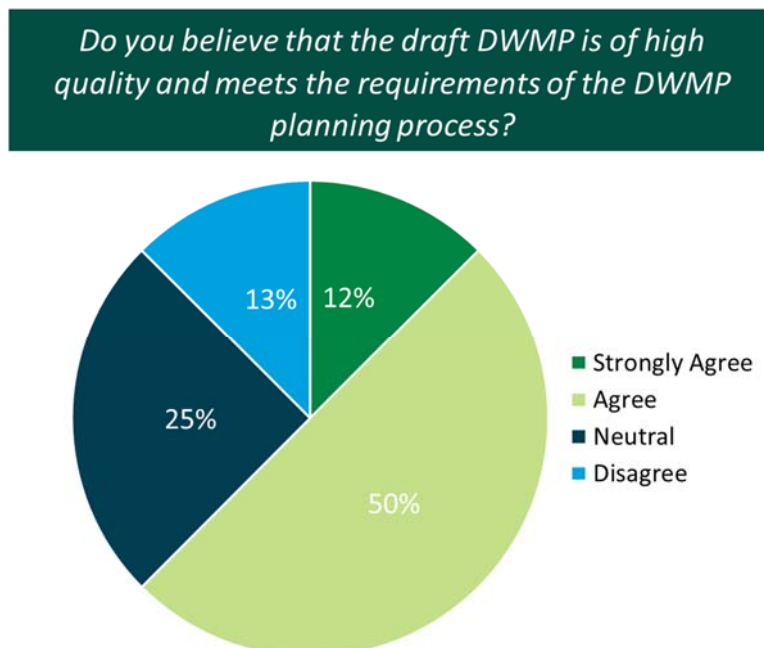
Stakeholder

“We consider that your dDWMP was generally well structured and technically well developed.”

Regulator

7.2.2 Results from the online survey showed that over 60 per cent of respondents ‘strongly agreed’ or ‘agreed’ that the dDWMP is of high quality and met the requirements of the DWMP planning process (Figure 31).

Figure 31 Results from the online survey



- 7.2.3 While we received largely positive responses on the draft dDWMP, areas for improvement highlighted across the responses can be summarised into the following themes:
- Structure and accessibility of the plan;
 - Our approach and response to consultation; and
 - Assurance and governance processes.

7.3 Our response and action taken between draft and final publication to address feedback

7.3.1 Structure, content and accessibility of the plan

- 7.3.1.1 In the feedback received from the draft consultation on structure, content and accessibility of the plan, respondents commented on the complex nature of the DWMP which some found difficult to read and digest. Respondents encouraged us to provide further materials that are accessible to a wide audience as well as suggested that the DWMP remain a live and fluid document.
- 7.3.1.2 Figure 32 shows examples of the comments we received from respondents on structure, content and accessibility of the plan. For the full list of comments received refer to Table 19 of Appendix A.

Figure 32 Examples of comments received on structure, content and accessibility of the plan

“We would encourage all companies to DWMP as a living document, to enable more solutions to be taken on board over time.”

Regulator

“Quantity of information in the report makes it difficult to fully digest (this is also the case for the whole of the DWMP).”

Stakeholder

- 7.3.1.3 The DWMP is a complex assessment with many different issues, considerations and scenarios, as well as technical requirements that must be adhered to nationally. As such there is a significant level of detail and information that goes into the plan. We appreciate that the volume of information in the technical appendices is not easily accessible to everyone.
- 7.3.1.4 One of the main aims for the plan was to provide a summary in various formats to ensure a variety of readers were able to access and learn about the plan. For example, the non-technical summary and the customer summary provide accessible overviews aimed at readers that may not have any prior knowledge of the DWMP or wastewater matters.
- 7.3.1.5 U UW has taken steps to streamline much of our documentation to improve and condense complex narrative. We have also included more signposting throughout to highlight where readers may find more information, for example the Strategic Planning Area Plans.
- 7.3.1.6 It is also important to note that the DWMP is a living document that will be updated every five-years. All of the feedback received will be given due consideration as we progress towards cycle two of the DWMP to inform our approach.
- 7.3.1.7 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Customer Summary;*
 - *Statement of Response; and*

- *Customer Geospatial Portal.*

7.3.2 Our approach and response to consultation

- 7.3.2.1 In the feedback received from the draft consultation on our approach and response to consultation, regulators asked us to consider the responses to the dDWMP consultation and explain how these have influenced our final DWMP. For the full list of comments received refer to Table 20 of Appendix A.
- 7.3.2.2 The feedback received throughout the draft DWMP consultation (between June and September 2022) has been used to improve our understanding of customer, stakeholder and regulators' opinions on our draft plan to inform the development of our final plan.
- 7.3.2.3 The Statement of Response was produced in December 2022 to present the feedback and the steps we intended to take to improve our DWMP.
- 7.3.2.4 Since then, further work has been undertaken to address the feedback and this table highlights where a reader may find the actions taken, outcomes and evidence across the final DWMP documentation.
- 7.3.2.5 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Statement of Response.*

7.3.3 Assurance and governance processes

- 7.3.3.1 In the feedback received from the draft consultation on our assurance and governance process, regulators stated that we should “ensure that a full Board Assurance Statement is also provided as part of your final DWMP submission, and we would welcome confirmation of any additional assurance provided on your final plan”. For the full list of comments received refer to Table 21 of Appendix A.
- 7.3.3.2 To manage the development of the first ever iteration of the DWMP, we have adopted a tiered approach to governance to provide internal scrutiny on plan development, promote alignment with wider processes, and support the internal team in developing the plan. The business governance and audit processes feed into and support final endorsement by the board as are summarised in our Board Assurance Statement.
- 7.3.3.3 For final publication of the DWMP, further independent assurance has taken place and a supporting Board Assurance Statement has been produced.
- 7.3.3.4 For more information on the steps we have taken between draft and final publication to address these comments please see:
- *Board Assurance Statement.*

8. All other feedback

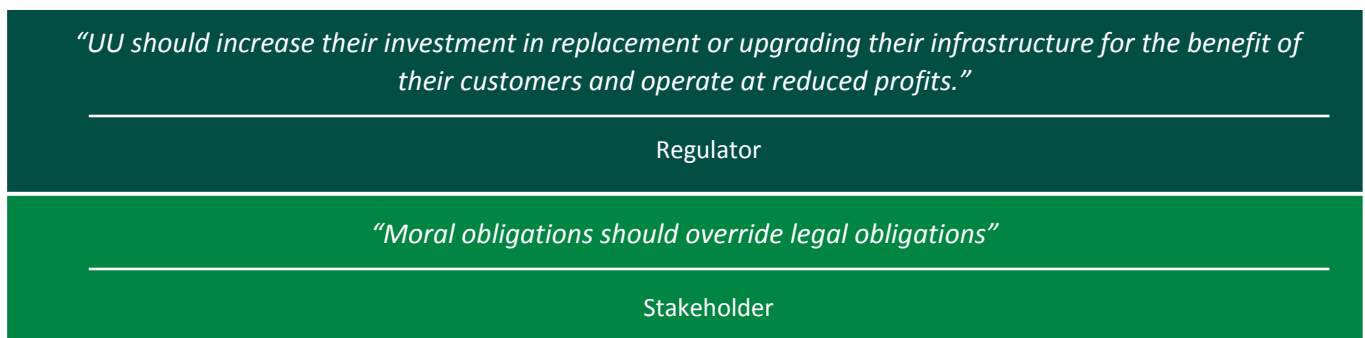
8.1 Introduction

- 8.1.1 In the first iteration of our Statement of Response, largely due to timescales, we made the decision to only respond to dDWMP specific comments which fell into the six key themes. Any other feedback relating to wider business activities was distributed to the relevant business areas for information and action where required. Between draft and final publication, we have received further guidance from the regulators that all comments should be responded to.
- 8.1.2 For more information on the steps we have taken between draft and final publication to address these comments please see:
 - *Statement of Response.*

8.2 Consultation feedback, our response and action taken between draft and final publication to address feedback

- 8.2.1 In the feedback received from the draft consultation, there were a number of comments that did not fit into the key themes largely addressing regulation, finance and public perception.
- 8.2.2 Figure 33 shows examples of the comments we received from respondents on all other feedback. For the full list of comments received refer to Table 22 of Appendix A.

Figure 33 Examples of all other comments



- 8.2.3 Uuw would like to reassure the respondent that we aim to provide the best possible services to customers and the environment as efficiently as possible, keeping bills as low as possible while supporting those who struggle to pay. Between 2020 and 2025 we are investing £5.9 billion in running and upgrading the North West's water infrastructure and services. We invest around £800 million a year, that's twice as much as we make in profit. Shareholders invest money in the company which we rely on to help fund our investment programme.
- 8.2.4 As a water company, our regulators include Ofwat, Drinking Water Inspectorate, and Consumer Council for Water, the Environment Agency, and the Department of Environment, Food and Rural Affairs. These regulators set the framework for company compliance and performance. Regulators also administer associated financial incentives/penalties for non-compliance or underperformance.
- 8.2.5 Alongside this, United Utilities Water also has to deliver against statutory and legal requirements, including those set out in the Water Industry Act 1991, and other corporate governance requirements. In the event of not meeting these requirements, the company is potentially subject to enforcement action from either the relevant regulators or the courts.
- 8.2.6 In our Annual Report, we set out our purpose, vision and values as a company and provider of an essential public service and how we seek to go beyond our obligations to provide the best possible

outcomes for the North West. Our Annual Report can be accessed on our corporate website (<https://unitedutilities.annualreport2022.com/>).

- 8.2.7 For clarification, SPA is the acronym for Strategic Planning Area. The Strategic Planning Areas are set out by the framework and are the 14 geographical areas across the North West region.
- 8.2.8 While long-term planning for wastewater services is not new, this is the first time we have produced a DWMP. The DWMP will be renewed on a five-yearly basis and is therefore not a static plan. Between draft and final publication of the DWMP, we have taken steps to incorporate and act on draft consultation feedback wherever possible to inform our fDWMP. In some cases, we were unable to carry out actions between draft and final publication due to time constraints and resources available. All of the feedback received will be given due consideration, to inform our approach as we progress towards cycle two of the DWMP.

9. Our DWMP

- 9.1.1 While long-term planning for wastewater services is not new, this is the first time we have produced a DWMP. The DWMP will be renewed on a five-yearly basis, and is therefore not a static plan but is a process that will continue to evolve through continued engagement with customers and stakeholders as well as building upon the tools and processes developed and seeking out opportunities for partnership working.
- 9.1.2 Between draft and final publication of the DWMP, we have taken steps to incorporate and act on draft consultation feedback wherever possible to inform our fDWMP. In some cases, we were unable to carry out actions between draft and final publication due to time constraints and resources available. All of the feedback received will be given due consideration, to inform our approach as we progress towards cycle two of the DWMP.
- 9.1.3 The DWMP sets out our long-term, strategic vision to maintain robust and resilient drainage and wastewater services for customers in the North West and will be used in conjunction with other long-term plans, such as the Water Resources Management Plan, to inform our business plan for investment cycle 2025–2030. We would like to express thanks for the continued wide support in developing the DWMP, and look forward to building on the vision already set out to create the best future possible for customers, stakeholders and the environment across the region.

Appendix A All feedback received in draft consultation

A.1 Overview

A.1.1 The tables in Appendix A show:


- The category and organisation of consultees;
- The consultation feedback (direct quotes);
- Statement of Response (location of how we have addressed the comment or justification if we have not within the SOR); and
- Final DWMP (location of actions taken between draft and final publication and/or further information for interest in our fDWMP documentation).


A.2 Options development, programme optimisation and the preferred plan

A.2.1 Options development and programme optimisation

Table 1 Our response to draft consultation feedback regarding options development and programme optimisation



Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Consumer Council for Water	In general ‘best value’ solutions should be sought given the impact of any works on customers’ bills. Nature-based and catchment wide solutions can represent the best value long term solutions, and we would encourage the company to look to the long term outcomes that can be achieved rather than adopting traditional engineering solutions that might offer an earlier output but come at a cost to the environment.	2.3.1.3– 2.3.1.7	Technical Appendix 7 – Options Development and Appraisal, Sections 5.2, 5.4, 5.6 and 5.7 and Technical Appendix 8 – Programme Optimisation, Section 3
	Separation of rainwater and foul sewage can have a major impact in reducing storm overflow discharge and sewer flooding. With more frequent severe rainfall events becoming more likely with Climate Change, separation of these systems is increasingly more important in mitigating against pollution incidents occurring. It will also allow the company to treat foul sewage more efficiently without the variable dilution and volumes caused by rainwater. We would expect the company to work with developers to ensure separation	2.3.1.3	Main Document, Table 4

Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	in all new developments. Other separation schemes need to consider areas at high risk of sewer flooding opportunities for collaboration and should be paced to spread the cost. Your slow draining rainwater technology sounds well placed to help ease the problem.		
 Environment Agency	We are pleased to see the six capitals approach driving the company to adopt the best value approach rather than the lowest whole life cost.	2.3.1.5-2.3.1.6	Technical Appendix 7 – Options Development and Appraisal, Sections 5.6.1 and 5.9.2 and Technical Appendix 8 – Programme Optimisation, Section 3
	We like the options hierarchy (1. Reduce service demand, 2. Better system management, 3. Create additional capacity) that underpins the best value approach, and that blue/green solutions are above grey solutions in the create additional capacity grouping.	2.3.1.5	Technical Appendix 7 – Options Development and Appraisal, Sections 5.3.1 and 5.8.1 and Technical Appendix 8 – Programme Optimisation, Section 3
	Despite the options hierarchy the preferred option is dominated by creating additional capacity, with little or no emphasis on nature-based solutions and surface water separation.	2.3.1.9	Technical Appendix 7 – Options Development and Appraisal, Section 5.6 and Technical Appendix 8 – Programme Optimisation, Section 3
	Furthermore, costings were predicated on those used within the Storm Overflow Evidence Project methodology, predominantly through ‘grey’ storage solutions within the network and not fully committing to nature-based solutions (NBS) as expected. United	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal,


Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	Utilities do refer to hybrid options, which includes SuDS, costing £25.9 billion, but it is unclear how this has been reached, although reference to the 'six capitals' approach with an appendix guide for benefits is given. Reed beds were referenced as an option for treatment of overflows, but when accounting for embodied carbon it seems less favourable.		Section 5.6 and Technical Appendix 8 – Programme Optimisation, Section 3
	The options hierarchy seems to have made little impact on the plan in terms of grey vs. blue/green solutions.	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 5.6, 5.7 and 5.8 and Technical Appendix 8 – Programme Optimisation, Section 3
 Ofwat	In your plan, you acknowledge that solutions with a lower carbon footprint, or that bring environmental benefits, should have a high priority.	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Section 5.6.2
	We note that you have provided an estimate for both approaches (best value and lowest whole life cost) but in most cases you had not provided the detail of how you have determined these costs.	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Section 5.5 and Technical Appendix 8 – Programme Optimisation, Section 3
	We consider that there is insufficient convincing evidence on why alternative options were discounted, although you state that your decisions are informed by a hierarchy approach based on customer preferences and research.	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6 and Technical Appendix 8 – Programme


Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
			Optimisation, Section 3
	it is not clear from your dDWMP how you discounted other green options at this stage.	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6 and Technical Appendix 8 – Programme Optimisation, Section 3.3
	we are unclear how your optioneering and decision-making support this ambition. (to include solutions that reduce carbon footprint or bring environmental benefits).	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6 and Technical Appendix 8 – Programme Optimisation, Section 3.3
	You should provide clarity on this (option development) in your final DWMP, along with the rationale as to why green options have been discounted.	2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6 and Technical Appendix 8 – Programme Optimisation, Section 3.3
	companies are required to provide sufficient and convincing evidence of the need, optioneering and cost efficiency and customer protection for expenditure proposals	2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6 and and Technical Appendix 8 – Programme



Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
			Optimisation, Section 5
	Options selected (for the preferred best value plan) should be compared to alternatives, such as least cost plans, with clear rationale for those that have been discounted and that green/ nature-based, low carbon solutions should be pursued where possible	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6 and Technical Appendix 8 – Programme Optimisation, Section 3.3
	We expect companies to provide appropriate evidence in their plans for prioritising traditional 'grey' solutions over more sustainable, green solutions	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6
	We expect to see sufficient and convincing evidence in plans as to why certain solutions were less favourable than other, particularly where traditional, grey solutions such as storage tanks, have been prioritised over green solutions. Nature-based solutions should be robustly consider, where appropriate, when determining the best long-term value.	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6 and Technical Appendix 8 – Programme Optimisation, Sections 3.3
	We note that you have attempted to define the benefits associated with best value on a qualitative basis, but you should develop your approach further in your final plan to quantify the multiple benefits of solutions.	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6 and Technical Appendix 8 – Programme Optimisation Section 3
	We consider that base activities that maintain and improve asset health and performance are essential to meet, and continue to meet, legal obligation and must form part of the company’s long-term strategy and	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development

Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	should be factored into the mix of options for addressing future resilience risks.		and Appraisal, Sections 2-6
	As DWMPs look holistically at a range of risks and mitigations at catchment levels, we expect you to provide more evidence in respect of costs and benefits of solutions, particularly schemes that deliver multiple benefits.	2.3.1.3- 2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Sections 2-6
 <p>Greater Manchester Combined Authority</p>	The existing approach to water management is fragmented and GMCA would support the development of an approach that embraces addressing sewer flooding as part of a wider and more comprehensive, integrated approach to managing water sustainably in both our urban and rural areas. Such an integrated approach to water management would be facilitated and supported by an increase in the alignment of a range of water-related strategies and investment cycles.	2.3.1.8	Main Document 4.4.11
	GMCA would encourage the Government to implement Schedule 3 of Flood & Water Management Act 2010 to provide a consistent standard for managing rainfall as close to source as possible and in doing so maximise opportunities for Sustainable Drainage Systems (SuDS) that can deliver multiple outcomes.	2.3.1.8	C002 Board Assurance Statement
	The DWMP has a strong focus on nature-based solutions and would also encourage the Government to consider a revised and more flexible regulatory and investment framework to enable more integrated and nature-based solutions to the challenges of sewer flooding.	2.3.1.8	Main Document, Table 4
	Developing a more integrated approach would help to maximise the impact, and speed up the delivery, of measures to address the adverse effects of surface water and sewer flooding.	2.3.1.8	Main Document, Table 4
 <p>Lancashire County Council</p>	More green spaces linked to drainage, e.g., SuDs, particularly in new developments. Green roofs, water harvesting, SuDs enabled trees (and the multiple benefits they provide).	2.3.1.11	Technical Appendix 8 – Programme Optimisation, Section 2.3
	Yes – barriers to property-level SuDS. These will need to be overcome with Local Authorities (LPAs and LLFAs) for property-level SuDS to become the 'norm' and to implement a change in mind set and behaviours amongst our society in relation to managing water on their property and within the community.	2.3.1.11	Main Document, Table 4

Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Peak District National Park Authority	The options hierarchy aligns with other water management hierarchies in use around the region. The approach is adequate at this stage of DWMP development but would have to be extended over time in order to demonstrate a maturing Plan. Review milestones would enable refresh of key aspects of the plan to take account of changes in thinking on subjects such as this (legislation, research, speed of climate change etc.) and allow key stakeholders to forward plan to input into such refreshes i.e. in service plans, strategies etc. to ensure alignment where possible and appropriate. The region's urban sewer network is predominantly combined rainwater/foul water, for historic reasons. Most of our historically-developed land does not offer ready access to public spaces to which the rainwater could reasonably be diverted, and the cost of laying parallel piped networks in the public highway is likely to be prohibitive. The only suggestion which could be fitted into the available space would be to develop more attenuation & infiltration measures around the gullies and other points at which rainwater enters the sewer network in conjunction with householders and other landowners (e.g. smart water butts, green roofs, attenuation basins), and with the local highway authorities (increased green areas such as trees, rainwater gardens and detention basins).	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Section 5.8 and Technical Appendix 8 – Programme Optimisation, Section 3.3
	As referred to previously nature-based solutions offer an effective way of delivering a wide range of benefits for a wide range of stakeholders. These include habitat creation / restoration, flood alleviation and reductions in the amount of eroded materials entering sewers and drains. Our preference is for nature-based solutions to be prioritised, as the long-term benefits outweigh the costs. However, as this focuses on the delivery of a wider public good, the costs should not be borne wholly by water company customers. The work undertaken by Moors for the Future to restore moorland has great benefits in slowing run off from key upland catchments, with various associated benefits. This work has been internationally recognised for the wider benefits that it brings. However, for such work to continue, a secure funding stream is needed.	2.3.1.11	Technical Appendix 7 – Options Development and Appraisal, Sections 5.6 and 5.8 and Technical Appendix 8 – Programme Optimisation, Section 2.3
	The preferred plan intervention types appear to offer a range of behavioural, soft and hard measures. They also follow a path aimed at reserving more carbon intensive measures for where other options are not feasible. It is important to ensure that a balance is included to ensure	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal,

Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	that this approach does not lead to a prolonged acceptance of environmentally damaging releases of effluent into watercourses.		Sections 5.6 and 5.8 and Technical Appendix 8 – Programme Optimisation, Section 2.3 and 5.6
	Wider environmental benefits should be considered, particularly in relation to delivering a net environmental benefit from any works undertaken	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Section 5.6 and Technical Appendix 8 – Programme Optimisation, Sections 3.3
 Ribble Catchment Conservation Trust Ltd	The 6 capitals assessment is not clear, how has economic discounting been applied to Best Value and Whole Life Cost? This could sway the economic capital weighting if the wrong discounting rate was applied.	2.3.1.3-2.3.1.10	Technical Appendix 7 – Options Development and Appraisal, Section 5.6 and Technical Appendix 8 – Programme Optimisation, Sections 3.3
 Staveley with Ings Parish Council	These options can only be fully and therefore successfully addressed by partnership working, as this plan emphasises. But this has to be real. Particularly in relation to reduced demand and local water management, it is essential that options and targets are pursued at local level and with local engagement.	2.3.1.3-2.3.1.10	Main Document, Section 4.4
	Permits must recognise the public demand for cleaner water in our rivers, lakes and seas.	2.3.1.11	Technical Appendix 8 – Programme Optimisation, Section 5.3
	Regulations to ensure compliance with likely stricter requirements should be part of the process.	2.3.1.11	Technical Appendix 8 – Programme Optimisation, Section 5.3


Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	Drainage capacity and surface water management are essential. Although reductions in use and behavioural change are very important, particularly to encourage active engagement, they will not deliver the improvements recognised as the plan has identified.	2.3.1.11	Technical Appendix 8 – Programme Optimisation, Section 5.5.1
 Stormwater Shepherds UK	I like the recognition of multiple different scenarios and options and the inclusion of nature-based solutions.	2.3.1.3-2.3.1.10	Technical Appendix 8 – Section 3.6
	Better surface water management is essential and must form a significant part of the plan. And homeowners/business owners need to be taught to manage their surface water and to take responsibility for their part in the burden on the network.	2.3.1.11	Technical Appendix 8 – Section 3.6
	What good is it having a comprehensive & expensive set of plans from the DWMP if the pollution from surface water sewers is not included in the Source Apportionment process and the in the plans. It is such a shame to leave the surface water sewers out.	2.3.1.11	Statement of Response, Section 2.3.1.11
 Warrington Borough Council	We believe Dynamic Network Monitoring allows maintenance to be managed proactively as oppose to on a reactive basis. However, is it that this approach is simply a sticking plaster approach to monitor an existing ageing asset to identify failure rather than invest to renew / replace critical infrastructure?	2.3.1.7	Main Document, Sections 8.2 and 10.2
	UU focus appears to be reduction in flooding from foul / combined systems. Flooding from surface water sewers should also be considered. Many existing surface water outfalls discharge into watercourses at a low level meaning that they are at high risk of hydraulic locking. Consideration should be given to these outfalls and the areas which they serve and assets amended e.g. installation of pump stations etc. to mitigate increases in risk due to higher watercourse levels as a result of climate change. The level of investment is not entirely financial, it is knowledge and understanding of what is required to meet targets. Upskilling is vital to this process. This provides an opportunity to develop skills, and to motivate and encourage engineers to remain in the industry (job retention) to provide a level of consistency throughout the lifecycle of both medium and long term plans. There are areas within the North West which are more skilled than others. Additional funding should be allocated to provide appropriate training and development opportunities to ensure future capacity and to attract people into the flood risk management industry.	2.3.1.11	Statement of Response, Section 2.3.1.11



Options development and programme optimisation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	Reduced service demand will be very difficult to achieve given climate change / population increase. Better system management and creating additional capacity is preferred. Existing aging assets should be replaced and upsized as required. SuDS should be adopted as part of new developments by UU and managed accordingly to ensure that they operate effectively. Customers already pay for surface water discharge and SuDS maintenance should be covered by this. Customers are paying for disposal of surface water to Water and Sewerage Companies yet the management of surface water flood risk sits with the Lead Local Flood Authorities under the Flood and Water Management Act 2010. A possible funding mechanism would be for funding to be made available to Local Authorities as a proportion of the surface water disposal charges already levied on customers by Water and Sewerage Companies	2.3.1.11	Technical Appendix 8 – Programme Optimisation, Section 5.6
 Wyre River Trust	There are excellent examples of solutions for the management and reduction of rainwater entering the sewer system. These include rain gardens, water butts, ponds, swales and wetlands. Many of these solutions can be installed at low cost and with considerable engagement of local communities. Where watercourses enter the sewer, the management of the upstream catchment should be considered, along with the restoration of the watercourse where possible.	2.3.1.11	Technical Appendix 8 – Programme Optimisation, Section 5.6
 Customer	Intercept rainwater on properties. It is an investment decision as to whether this is a better option than treating the combined sewage and rain water	2.3.1.11	Technical Appendix 8 – Programme Optimisation, Section 5.6



A.2.2 The preferred plan



Table 2 Our response to draft consultation feedback regarding the preferred plan





The preferred plan			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Consumer Council for Water	We encourage companies to look at long term ‘best value’ solutions that provide lasting and wider ranging beneficial outcomes. While there is an attraction to ‘least cost’ options, these can result in shorter-term	2.3.2.3	Technical Appendix 8 – Programme Optimisation,


The preferred plan			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	solutions that need to be revisited to provide longer-term resilience, ultimately at potentially higher cost to customers and the environment.		Sections 3.3 and 5.6
 Environment Agency	Not enough emphasis on surface water separation and blue-green solutions. While we recognise that grey infrastructure may be appropriate in the short term to meet immediate demands and as the knowledge base of alternatives grows, in the medium/longer-term there must be a fundamental shift to more sustainable solutions.	2.3.2.4-2.3.2.7	Technical Appendix 8 – Programme Optimisation, Sections 3.3 and 5.6
	However, only a relatively small sum of expenditure (circa £1bn) seems to have been subjected to the DWMP options hierarchy discussed and agreed with stakeholders. There is an additional £18-20bn identified for addressing storm overflows which is focussed almost wholly on providing additional storage.	2.3.2.4-2.3.2.7	Technical Appendix 8 – Programme Optimisation, Sections 3.3, 5.5 and 5.6
	With regards to options, United Utilities do not detail specific deliverables, including where and when they would occur.	2.3.2.10-2.3.2.11	Statement of Response, Sections 2.3.2.10-2.3.2.19
	We feel it is a good high level plan but it doesn't contain enough detail to define what is going to be delivered or how we would measure outputs and outcomes. We would like to understand whether you intend to increase the level of granularity so we can see (and comment on as appropriate) what is being planned in each of the SPUs.	2.3.2.10-2.3.2.11	Statement of Response, Sections 2.3.2.10-2.3.2.19
	We note that you 'explored the cost of a hybrid solution to storm overflows of SuDS and storage' which would deliver 'additional natural and social capital benefits alongside increased resilience' which would cost an additional £7.6 billion. We encourage UU to explore this option further, including ascertaining the views of its customers, with a view to making it its preferred plan.	2.3.2.12	Technical Appendix 8 – Programme Optimisation, Sections 3.3, 5.5 and 5.6
	The DWMP seems to be relying heavily on infrastructure improvements at WwTWs and there may be more innovative ways to deal with the increased flows further up the catchment to reduce and improve flows.	2.3.2.12	Technical Appendix 8 – Programme Optimisation, Sections 3.3, 5.5 and 5.6
 Ofwat	At this stage – we expect companies to have a more detailed understanding of the likely scale and pace of investment requirements across the 25-year planning	2.3.2.10	Technical Appendix 8 – Programme

The preferred plan			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	horizon, and therefore be able to be clear on what best value, least regret solutions are likely to be put forward for PR24.		Optimisation, Sections 3.3, 5.5 and 5.6
	We are concerned that companies have not yet fully or adequately identified the scale or timing of their investment need and have therefore not fully consulted on these	2.3.2.10	Technical Appendix 8 – Programme Optimisation, Sections 3.3, 5.5 and 5.6
	Companies' plans should clearly set out the outcomes or performance levels that they need to achieve, and why. The plans should then map the required interventions across how these outcomes will be delivered	2.3.2.12	Technical Appendix 8 – Programme Optimisation, Sections 3.3, 5.5 and 5.6
 Groundwork Greater Manchester	We would be keen to see how the plan will actually be delivered.	2.3.2.10	Main Document, Sections 10.2 and 13.3
	Basically, agree with this approach but we need to ensure water isn't just running off directly into watercourses, as it may have amounts of contaminants that could be harmful to the environment. In addition, we need to know what the impacts may be from a fluvial flooding perspective. SuDS is currently not consistently referenced for each district; in the current plan it instead frequently says surface water control. While we generally agree with the preferred option types, we would need more information & understanding on each catchment area to assess whether we support the options recommended.	2.3.2.18	Main Document, Section 10.2
 Merseyside Environmental Advisory Service	We welcome the proposal for environmental investment of 94.4 per cent (Alt Crossens) 92.5 per cent (Weaver Gowy) and 81.0 per cent (River Mersey) in creation of additional wastewater treatment and storage capacity across the LCR catchments.	2.3.2.12	SPA_01 to SPA_14

The preferred plan			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Moors for the Future Partnership	To expand upon the theme of Soft NFM activities (nature-based solutions), such as gully blocking, re-vegetation of bare peat and sphagnum inoculation, in the upper catchments to keep more water in the peatlands and woodlands at the top of the catchments. By reducing flood peaks and increasing lag times, we can reduce mixing of rain water and sewage in the waste water system. By working in partnership with Moors for the Future, the Environment Agency and other environmental organisations, we can achieve synergies and cost savings in carrying out such work. Concerning the better education of the public regarding items that should not be flushed down toilets or sinks; this should include not just the obvious items such as nappies and sanitary towels, but also such things as butter/fat from cooking. Maybe posters can be made available for display in public and school lavatories. Obviously, these are not the places where butter might enter the sewage system, but the posters could reinforce the total message regarding the do's and don'ts of waste disposal into the sewage system. Can UU team up with hardware/DIY chains to sponsor, or promote, the purchase by the general public of water butts for domestic use (to intercept and collect rain water)?	2.3.1.11	Main Document, Section 4.4
 Natural England	The DWMP is at a very high level and has identified a range of different, generic options that will be carried out within the SPAs and TPUs, however none of these are specific to particular locations so at this stage so it is difficult to provide detailed comment. Natural England would expect to continue to work with UU to ensure that biodiversity and the environment, particularly within Protected Sites, is improved. The individual plans for the different SPAs ought to refer to the presence of Protected Areas (and the HRA), and these need to be taken account of when developing the generic options further.	2.3.2.10- 2.3.2.11	SPA_01 to SPA_14
	Some operations are likely to need a further, more bespoke assessments in due course e.g. sewer maintenance within rivers, and no adverse effect on integrity cannot be ruled out at this stage. Table 4.2 does not contain all of the TPUs that are within particular SACs, in particular many of the 95 TPUS in the Eden Esk SPA (River Eden SAC), Derwent (River Derwent and Bassenthwaite Lake SAC), Kent and Leven (the River Kent SAC and Esthwaite Water Ramsar site). Appendix A does not include River Kent SAC or Esthwaite Water	2.3.2.10- 2.3.2.11	SPA_01 to SPA_14

The preferred plan			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	<p>Ramsar Site. These sites are within several TPUs. Section 4.2.9 provides a brief AA for the water transfer scheme from Askham to Sockbridge. It states that Discharges from Askham currently contribute to baseflow in the River Lowther, although this contribution is inconsequential due to the small volumes that are treated and discharge, the contribution of surface water from the catchment, and the regulated nature of the river at this point (partly maintained by compensation releases from Haweswater). The reductions in discharges from Askham would not therefore affect the achievement of flow targets for the River Lowther. While this may be the case, some additional modelling (in combination with the compensatory flows from Haweswater) needs to be done to provide appropriate, robust evidence.</p>		
	<p>The Eden and Esk DWMP refers to the sewer going down the middle of the River Caldew, through Carlisle – Section 3.3 says to connect an existing sewer that lies in the riverbed of the Caldew and significantly increasing its loading. Another option is to build a new, dedicated wastewater treatment works for the development. Deciding which option would be best is a challenge and all options will require significant investment in both the network and wastewater treatment works to ensure protection of the environment and water quality. The River Caldew is within the River Eden SAC, and sections of the pipe are becoming exposed and very vulnerable to river erosion and movement, meaning that there is a high risk of collapse and a major pollution event in the SAC. This needs to be taken account of While planning the solutions, and alternative locations for the sewer investigated and delivered. Similarly, there is an exposed sewer within the River Eamont at Eamont Bridge, also within the River Eden SAC, which is at risk of collapse. There are also proposed river restoration works at this location that will have flood benefits for the village that will interact with the sewer. A more sustainable option/route needs to be investigated in this location. There are other locations where there is sewerage overflow or pipe collapse that are impacting on protected sites within the Eden - Esk area that need addressing e.g. close to Temple Sowerby Moss SSSI.</p>	<p>2.3.2.14- 2.3.2.15</p>	<p>SPA_04</p>
	<p>There is a specific issue with a sewer in Staveley that is having an adverse effect on the River Kent SAC. The Plan needs to include specific action to address this.</p>	<p>2.3.2.16</p>	<p>SPA_06</p>


The preferred plan			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Peak District National Park Authority	It is hard to say whether risk is fully addressed. Nationally, the recent severe weather events have shown how unpredictable rainfall can be, with drought and flooding occurring effectively at the same time. This obviously leads to strain on existing drainage systems and in some well documented cases release of untreated sewerage into rivers, estuaries and other coastal areas. The preferred plan does target spending in those areas where perceived risk is greatest and this is positive. It is however unclear whether contingency is built into the costings given the current and predicted levels of inflation, and if in effect, there is a Plan B to offset increased costs of remedial measures.	2.3.3.3	Statement of Response, Sections 2.3.2.10-2.3.2.19
 Ribble Catchment Conservation Trust Ltd	Conveying what some of the outcomes and outputs mean practically (is needed in the preferred plan).	2.3.2.10	Technical Appendix 8 – Programme Optimisation, Sections 3.3 and 5.6 and Main Document, Sections 10 and 13
 Warrington Borough Council	According to SPA08 in respect of Warrington North, it is proposed that around 14 per cent of the investment could be to address flooding and around 86 per cent of investment could be to address environmental risks. We consider that the investment in addressing flood risk should be higher.	2.3.2.17	SPA_08
 Wyre River Trust	It is clear from the financial breakdown of project types that there is a significant gap in investment in catchment-based projects.	2.3.2.10-2.3.2.12	Technical Appendix 8 – Programme Optimisation, Sections 3.3 and 5.6 and Main Document, Sections 10 and 13
 Customer	Best value for the environment (is their preferred approach). Because of historical low investment this will result in a loss of shareholder value over the next decade or more	2.3.2.3	Technical Appendix 8 – Programme Optimisation, Sections 3.3 and 5.6 and Main





The preferred plan			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
			Document, Sections 10 and 13
 SENS (Sustainability and Energy Network in Staveley)	Inevitably the DWMP is dominated by the technical. In the next iteration it will be essential to include more of the human - not least to ensure that an increasingly concerned public understands and supports the 25-year plan, and its year-on-year delivery. On one specific point - there will need to be much more explanation of the disproportionate investment (i) in Liverpool and Greater Manchester and (ii) in larger towns e.g. Kendal. It does appear that smaller communities tend to be overlooked. Perhaps there is an explanation for this but it's hard to see the low priority which Staveley achieved despite its high risk scores especially on flooding. This argues for more local engagement and an explicit commitment by UU to act in the public's best interests.	2.3.2.3-2.3.2.12 and 2.3.2.14	Statement of Response, Sections 2.3.2.3-2.3.2.12 and 2.3.2.14
	The document is vague on both demand management and upstream water management. There is no clarity about what this would mean, who would fund and undertake the work, and who would provide leadership and accountability, always crucial in a partnership plan. There seems to be a very cursory analysis of human behaviour, and how this might impact the DWMP now and in the longer-term.	2.3.2.10-2.3.2.12	Technical Appendix 7 – Options Development and Programme Optimisation, Section 5.7
	It seems reckless to settle on £3.5bn investment with so much uncertainty. It would be more honest to set out a range which allows for some of the present imponderables. On one specific point the DWMP appears to assume that regulation will continue to be somewhere between light and ineffectual. After the last few months, perhaps this should be re-thought.	2.3.2.10-2.3.2.12	Technical Appendix 8 – Programme Optimisation, Section 5.7

A.2.3 Adaptive planning

Table 3 Our response to draft consultation feedback regarding adaptive planning



Adaptive planning			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Ofwat	However, we note that this approach (adaptive planning) is not applied across all areas of your plan. While you have separately assessed the key areas of uncertainty and risk, it is not clear how these then link	2.3.3.5 – 2.3.3.6	Main Document, Section 10.5


Adaptive planning			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	through to the different pathways that are required as part of a fully adaptive planning process.		and Figure 43
	We expect a well-developed, adaptive plan to demonstrate that an optimised programme of investment has been prioritised	2.3.3.5 – 2.3.3.6	Main Document, Section 10.5 and Figure 43
	Companies should demonstrate the pace of investment over time and show how certain solutions could address multiple risks	2.3.3.5 – 2.3.3.6	Main Document, Section 10.5 and Figure 43
	We consider that your plan demonstrates a good understanding of the aims of adaptive planning.	2.3.3.5 – 2.3.3.6	Main Document, Section 10.5 and Figure 43
 Lancashire County Council	Section 6.4 makes it clear that there are challenges with adopting an 'either-or' approach to making these decisions. The DWMP makes a strong argument for remaining adaptive (Section 6.6) so that the best outcomes can be achieved for each investment plan.	2.3.3.5 – 2.3.3.6	Main Document, Section 10.5 and Figure 43
 Peak District National Park Authority	A risk-based approach appears to be sensible, but may need to be adaptive depending on the future climate and predictability of extreme weather events.	2.3.3.5 – 2.3.3.6	Main Document, Section 10.5 and Figure 43
 Ribble Catchment Conservation Trust Ltd	Having the information to identify the need to adapt, and the options has been identified. But the resources to adapt is a crucial additional need. The adaptation may require changes to options not previously considered or prepared for, the timescales of change needed by adaptive actions may combine to result in no action. Adaptive planning must result in adaptive action that is in line with the requirements of the need for adaptation. Which invariably means resource that can be drawn on.	2.3.3.5 – 2.3.3.6	Main Document, Section 10.5 and Figure 43
 SENS (Sustainability and Energy Network in Staveley)	Yes, although given the considerable uncertainties, some of which but probably not all are highlighted in the plan, it will need early and continuing renewal if it is to be fit for purpose.	2.3.3.5 – 2.3.3.6	Main Document, Section 10.5 and Figure 43
	DWMP correctly stresses the uncertainties which surround a 25-year plan, especially in such a volatile environment. By 2050 the impact of climate change will almost certainly be greater than we can presently	2.3.3.5 – 2.3.3.6	Main Document, Section 10.5

Adaptive planning			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	comprehend. This will directly affect drainage and wastewater systems. At the same time people will become more aware, in terms of lived experience as well as knowledge. This could have a number of results. On the positive side there could be a growing willingness to think differently about all things water. More negatively, the criticism and anger which has been manifest this summer/autumn could grow and place much greater pressures on the water companies, their regulators, and the government.		and Figure 43

A.2.4 WINEP and legal obligations

Table 4 Our response to draft consultation feedback regarding WINEP and legal obligations




WINEP and legal obligations			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Ofwat	DWMPs will also need to fully reflect the requirement of the WINEP.	2.3.4.1	Technical Appendix 8 – Programme Optimisation , Section 5.3


A.3 Stakeholder engagement and partnership solutions


A.3.1 Partnership solutions



Table 5 Our response to draft consultation feedback regarding partnership solutions







Partnership solutions			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Consumer Council for Water	The company has invested a considerable amount of time, effort and resources into the engagement process. It has engaged with a wide range stakeholders and organisations who have a role in drainage and planning, as evidenced by 29 external stakeholders in The Strategic planning Group. It is clear from the summary that the Strategic Planning groups have been very active and successful.	3.3.1.3	Technical Appendix 2 – Stakeholder Engagement, Section 2.3, Paragraphs 2.3.2.1-2.3.7.8



Partnership solutions			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	We are particularly pleased to note that 1164 partnership opportunities have been identified as a result of the 30 workshops it has hosted. These are presented in a clear and understandable format but we think they would benefit from further detail in the plan e.g. case studies for each area. Figure 16 in the engagement summary Partnership opportunities identified was particularly helpful.	3.3.1.3	Technical Appendix 2 – Stakeholder Engagement, Figure 19
 Environment Agency	UU consulted at the strategic context level about the long-term ambitions for the North West, then shared modelled risk results through workshops, identified opportunities for collaboration, develop partnership opportunities for the plan and sharing feasible options. We conclude that UU has made considerable efforts to engage at each stage in the process and seemingly in an active and genuine way.	3.3.1.3	Technical Appendix 2 – Stakeholder Engagement, Sections 2 and 3, Paragraphs 2.3.2.1-3.8.5.1
	Looking forward, all companies need to consider the maintenance of the stakeholder relationships that have been formed in the development of this DWMP. Stakeholders, including the Environment Agency, will be interested in understanding how United Utilities will track identification of risks and delivery of solutions within DWMPs and their success at mitigating risks.	3.3.1.7-3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Section 4.4 and 4.5, Paragraphs 4.4.1-4.5.9
	At face value the Plan could incorporate more ideas from stakeholders and be much stronger on identifying and delivering partnership opportunities through aspirational collaboration based on future proposals.	3.3.1.5-3.3.1.6	Technical Appendix 2 – Stakeholder Engagement, Section 4.4 and 4.5, Paragraphs 4.4.1-4.5.9
	We would like to see more detail to identify the synergies and partnership opportunities that support development of the EA’s future Flood and Coastal Risk Capital Programme.	3.3.1.9	Technical Appendix 2 – Stakeholder Engagement, Sections 2.3.2 and 2.3.3
	there is a sense from some of our staff that opportunities have been missed - good ideas were put forward that either haven’t been reflected in the draft plan, or we can’t see them.	3.3.1.5-3.3.1.8	Technical Appendix 2 – Stakeholder Engagement, Figure 20 and 21



Partnership solutions			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	A pipeline of options was created at these workshops which UU mention in the text of the documents, but no detail is given as to what is in each pipeline.	3.3.1.5- 3.3.1.8	Technical Appendix 2 – Stakeholder Engagement, Appendix A
	local feedback implies that some of the partnership opportunities developed in workshops have been included, but others have been missed out e.g., for the Douglas; the West Lancs Heritage Park (IMO) holds fewer opportunities than the Syd Brook NFM proposal where sewer capacity is very limited.	3.3.1.5- 3.3.1.8	Technical Appendix 2 – Stakeholder Engagement, Figure 20, Figure 21 and Appendix A
	Some of the partnership opportunities we offered are not featured in the plan and we have had no feedback as to why some opportunities went through and others did not.	3.3.1.5- 3.3.1.8	Technical Appendix 2 – Stakeholder Engagement Figure 20, Figure 21 and Appendix A
 Ofwat	In our pre-consultation feedback, we stated the importance of considering where nature-based or green solutions could address the risks identified. This is a key consideration in the DWMP Guiding Principles and the Defra storm overflow discharge reduction plan. We asked that companies clearly explain why green solutions would not be feasible. We note the work that you have carried out at the Greater Manchester Area and Upper Mersey catchment, as well as the investment proposed to commission green infrastructure options and other nature-based solutions.	3.3.1.9	Technical Appendix 2 – Stakeholder Engagement, Section 3.7.2 and 3.7.5
	We welcome your approach to engaging with RMAs and other stakeholders, and it is encouraging to see that you have identified some potential opportunities for collaborative partnership schemes.	3.3.1.5- 3.3.1.8	Technical Appendix 2 – Stakeholder Engagement, Sections 2 and 3, Paragraphs 2.3.2.1-3.8.5.1
	We acknowledge the work that you have done to seek the endorsement from different strategic partners and stakeholders.	3.3.1.3	Technical Appendix 2 – Stakeholder Engagement, Sections 2 and


Partnership solutions			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
			3, Paragraphs 2.3.2.1-3.8.5.1
	We note that you have demonstrated how stakeholder engagement has shaped some elements of your plan and influenced some of your bespoke planning objectives.	3.3.1.5-3.3.1.8	Technical Appendix 2 – Stakeholder Engagement, Section 4.3, Table 1
	We are concerned that companies have not maximised opportunities to engage and work with other risk management authorities, with responsibilities for drainage, to fully explore partnership schemes that could offer best long-term value.	3.3.1.3-3.3.1.8	Technical Appendix 2 – Stakeholder Engagement, Sections 2 and 3, Paragraphs 2.3.2.1-3.8.5.1
	However, it is unclear to us at this stage whether these opportunities will materialise. In your final DWMP you should provide further detail on the likelihood of your partnership schemes going ahead, including timelines for delivery and the split in funding contributions, and be clear on the rationale for not progressing such schemes, where applicable	3.3.1.6	Technical Appendix 2 – Stakeholder Engagement, Section 4, Paragraphs 4.2.1-4.5.9
	Opportunities have been identified but not yet sufficiently well-defined to provide confidence that they will be prioritised above alternative options and be successfully pursued	3.3.1.9	Technical Appendix 2 – Stakeholder Engagement, Sections 3.4, Figure 20 and 21
 Copeland Borough Council	Resources, both time and financial. Sometimes it is aligning the priorities and funding programmes of different organisations that makes partnership working more difficult than it could be. Partnership working can also be influenced by different people, who give this more or less priority than others.	3.3.1.7-3.3.1.8	Technical Appendix 2 – Stakeholder Engagement, Sections 2.3, Paragraphs 2.3.2.1-2.3.7.8
 Greater Manchester Combined Authority	The challenge of retrofitting the network already in place across Greater Manchester and beyond is immense but addressing this collectively through an Integrated Water Management approach will deliver a range of broader benefits including building resilience and increased place making, helping UU deliver against the specific outcome around CSO's.	3.3.1.7	Technical Appendix 2 – Stakeholder Engagement, Sections 3.7.1-3.7.5

Partnership solutions			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	GMCA support the hierarchy of interventions suggested in the consultation document and encourage United Utilities to develop bespoke partnerships at each level of the hierarchy.	3.3.1.7	Technical Appendix 2 – Stakeholder Engagement, Figures 22 and 23.
 Lake District National Park Authority	United Utilities and Lake District National Park Authority work well together in partnerships at different scales - greater awareness of colleagues and their roles in both organisations could help drive improved understanding of plans and project delivery.	3.3.1.3	Technical Appendix 2 – Stakeholder Engagement, Sections 4.1-4.5
	Idea for collaboration - is there an opportunity to focus an effort through Love Windermere to highlight how this partnership works together on the DWMP?	3.3.1.3	Statement of Response, Section 3.3.4
	Public concern and perception; however that has currently been tactically addressed through Love Windermere partnership and although we appreciate this is a new partnership, can it be recognised in the next iteration of the DWMP?	3.3.1.3	Statement of Response, Section 3.3.4
 Merseyside Environmental Advisory Service	We recognise the opportunity and links between local nature recovery, the Drainage and Wastewater Management Plan (DWMP), Water Industry National Environment Programme (WINEP) for creation of new green treatment and drainage capacity and water quality improvements.	3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Sections 4.1-4.5
	There is also opportunity to stack multiple environment benefits e.g. biodiversity, carbon storage, flood risk management which in turn could yield longer-term financial benefits to the utilities company While contributing to nature recovery and net gain (i.e. biodiversity, marine and environmental).	3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Sections 4.1-4.5
 Moors for the Future Partnership	Further, we would encourage United Utilities active participation and investment in local nature recovery in the LCR including the emerging LNRS as a once in a generational opportunity to address the climate (and ecological) emergency	3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Sections 4.1-4.5
	UUW is a partner in the Moors for the Future Partnership, of which the Peak District National Park Authority is the hosting organisation; together we have been carrying out moorland restoration works in your upper catchments, working closely with your Catchment Partnership Officers, in order to provide	3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Sections 4.1-4.5

Partnership solutions			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	<p>environmental, NFM and water supply quality benefits. We are pleased to see this mentioned in the Place-Based Planning section of the draft Report and we thank you for the funding you made available to us in AMPs 5 and 6 to be able to carry out this work. However, there was limited funding for work in the current AMP period, AMP7. We are currently in discussion with your Catchment Partnership Officer regarding priorities and funding for our work in AMP8. We appeal for more certainty of funding over a longer period, as this allows us to retain skilled staff, and in turn provide greater forward notice to our contractors in order for them to have the confidence to invest in specialist machinery and staff. This allows us to deliver restoration works at scale, and with the cost benefits thereof. We are encouraged by the time horizon of 2050 alluded to in the draft Plan. We are also encouraged by the mention of closer work with the Environment Agency and the Greater Manchester Combined Authority. The Moors for the Future Partnership is already engaged with these entities, with the EA being a longstanding and essential partner organisation. Furthermore, the Royal Society for the Protection of Birds (RSPB) is another of our partner organisations with whom we plan and carry out joint moorland restoration projects. To this end, we also appeal for funding explicitly earmarked for monitoring and engagement activities, in order to derive the full benefits from such partnerships, through the effective communication and advocacy of evidence-led conservation solutions, to achieve the upland environmental and NFM benefits of the draft DWMP in the most cost-effective and efficient manner. These comments have been made from the Moors for the Future perspective, but we would re-iterate them as general comments in answer to this consultation. For your work with all of your partners, you will achieve the most effective return on investment through predictable funding over a longer-term, combined with an increased emphasis on monitoring and communication/engagement. Note that this is not an appeal for more funding (though this would obviously be welcome), but for predictability over the long term (until at least 2030, if not 2050).</p>		
 Peak District National	Partnership working, innovation and legislative change all have a part to play, with legislation perhaps offering the strongest driver for change. The wider benefits to	3.3.1.3	Technical Appendix 2 – Stakeholder

Partnership solutions			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
Park Authority	the environment of measures to improve drainage and wastewater management should mean that there is a clear incentive for funding and delivering such measures through a partnership approach.		Engagement, Sections 4.1-4.5
	The key thing about the draft DWMP is the partnership focus that it takes. Generally speaking, collaborative working achieves better results, particularly when responsibilities are shared and funding is limited.	3.3.1.3	Technical Appendix 2 – Stakeholder Engagement, Sections 2 and 3
	A better understanding of the overall value to each organisation of working in partnership. This may be down to monetary value or to the cost: benefits of a partnership project. Currently, there appears to be a siloed approach to working with each organisation acting on their own. For example, While water companies are responsible for the control of foul waste, the benefits to all of preventing or suppressing large volumes of flood water from entering the sewer network appear to be overlooked. Combining efforts with planning and highway authorities could slow run-off While creating new habitats bringing a wider environmental benefit and reducing sewage discharge.	3.3.1.3	Technical Appendix 2 – Stakeholder Engagement, Sections 2 and 3
 Ribble Catchment Conservation Trust Ltd	It is hard to see how Key Priorities from other management plans have been considered and or reflected. Understanding this is crucial to knowing whether collaboration opportunities cited are correct. In figure 11, the Partnership Opportunities Pipeline, how was the original number narrowed to key opportunities?	3.3.1.5-3.3.1.8	Technical Appendix 2 – Stakeholder Engagement, Figure 20 and 21.
 Staveley with Ins Parish Council	Community projects are the key to this and UU is advised to seek creative opportunities to consider how all its partners can come together with the community to address this in a really constructive way.	3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Section 3.2.5
	A clearer understanding of what partnership work in a rural context might look like. It is unclear what is meant by modification of permits - this could be encouraging or concerning	3.3.1.9-3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Section 3.7, Paragraph 3.7.2.1 and Figure 29


Partnership solutions			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 <p>Stormwater Shepherds UK</p>	<p>I think UU do a good job of partnership working. I would suggest building on the information that is shared on local TV and Radio which reaches people who don't take part in consultations and who don't sit in partner organisations. They are an excellent way to reach a lot of people who may otherwise not hear your messages.</p>	3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Sections 4.1-4.5
 <p>Warrington Borough Council</p>	<p>Processes appear to be inconsistent across UU catchment areas. UU should look to standardise processes.</p> <ul style="list-style-type: none"> • Alignment of investment programmes is critical e.g. AMP & FDGIA. • Greater collaboration between RMA's with better mechanisms in place to fund collaborative schemes specifically the ability of Water and Sewerage Companies to contribute financially to schemes. Warrington Borough Council has a good track record of delivering flood risk management schemes in collaboration with UU but the process of doing so needs to be made easier. Effective surface water management requires coordinated action by all of those with responsibilities for managing land, rivers and drainage systems. LLFAs have the leadership role on surface water management but others, including water companies / Environment Agency also have important roles to play and the responsibilities between different parties is not always clear cut, particularly when the source of flooding is unclear or there are different sources working in combination. Flood risk management is fragmented across the RMA's which creates issues when it comes to roles and responsibilities and ultimately affects customers who become confused. Consideration should be given to whether drainage should come under one body so drainage can be managed holistically and funded appropriately. Reclassification of Public Sewers as Culverted Watercourses by Water and Sewerage Companies presents a significant challenge as what are often major assets and form the spine of a public sewer network for an area are passed to riparian owners who are ill equipped to manage / maintain the assets. Furthermore, the burden of enforcement will fall to local authorities despite the Water and Sewerage Companies taking significant benefit from these culverts for many years. Our primary duty is to our customers and the reclassification of public 	3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Sections 2.1-2.3


Partnership solutions			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	sewers will create confusion and stress when reporting flooding and will generate significant anxiety for residents who would be deemed to be riparian owners with additional cost and risk being real concerns. As these assets would be managed on a piecemeal basis going forwards with limited investment, flood risk would increase as a result of asset failure or incapacity to cope. If Water companies progress with their intention to transfer water from their systems to water courses, this will create significant flood risk as water courses are unable to cope. This again passes the responsibility to maintain watercourses onto local authorities (with no additional funding), land owners and residents etc. Ultimately the risk to the UU network increases. UU are looking at removal of surface water from their systems. However, this strategy may increase flood risk as the water will be put direct into watercourses which will increase their flows. These watercourses may not be suitable to accept additional flows and flood risk increased.		
 Wyre River Trust	Based on our current and previous projects, we would say that partnership working is currently working well within the Wyre Catchment.	3.3.1.10	Technical Appendix 2 – Stakeholder Engagement, Section 3.7.3



A.3.2 Stakeholder engagement



Table 6 Our response to draft consultation feedback regarding stakeholder engagement




Stakeholder engagement			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Consumer Council for Water	We also liked that stakeholders were asked and suggested a wide range of organisations they felt should be consulted with on the DWMP. UUW has since engaged with over 50 stakeholders in the development of the draft DWMP.	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Section 3.1
	Figure 11 in the Engagement summary details these but there is no further information about who, how or what feedback was received.	3.3.2.5	Technical Appendix 2 – Stakeholder Engagement, Section 3.1

Stakeholder engagement			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Environment Agency	<p>United Utilities made considerable efforts to engage with stakeholders at the BRAVA and ODA stages of the process for all fourteen strategic planning units, using a variety of engagement methods. The company also placed the DWMP in a strategic context by consulting on long-term ambitions for the north west.</p>	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Section 3.2
	<p>Planning objectives were tested with stakeholders in the strategic context stage and additional planning objectives were adopted as a result of that engagement. A specific example is external sewer flood risk that stakeholders cited as a cause for concern.</p>	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Section 3.2
	<p>UU responded to stakeholder views by making the targets in the pollution incidents reduction planning objective more ambitious.</p>	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Section 3.2
	<p>UU hosted over thirty workshops with twenty-nine external stakeholders to identify 1164 potential partnership opportunities. All were reviewed for applicability to the DWMP, reducing the opportunities to 500, still substantial. Effective engagement with Risk Management Authorities and partners will be essential in converting these opportunities into outcomes for communities and the environment.</p>	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Figures 20 and 21
	<p>some of the engagement was more of the ‘Decide, Announce, Defend’ variety as opposed to ‘Engage, Deliberate, Decide’ the latter being the proposed approach as described in the Water UK Technical Guidance document and Defra’s guiding principles.</p>	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Section 3
	<p>some of our staff who attended the workshops felt that the engagement would have benefitted from a more ‘Engage, Deliberate, Decide’ approach (as opposed to ‘Decide, Announce, Defend’).</p>	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Section 3
	<p>UU needs to change its style of engagement. More ‘Engage, Deliberate, Decide’ and less ‘Decide, Announce, Defend’. Stakeholders need to feel more ownership of the Plan, rather than a consulting body being asked for a view on what is already there.</p>	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Sections 3 and 4.3
	<p>The summary table of the main aspects of each stakeholder management plan relevant to each Strategic Planning Unit (SPU or river catchment) in the Level 2 plans indicates that UU has given serious consideration to how the DWMP interacts with other strategic plans e.g., FRMP, RBMP. We also note the</p>	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Sections 2 and 3

Stakeholder engagement			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	variety of engagement methods: face-to-face workshops, newsletters, collaboration portal, Teams meetings, Miro whiteboards, geospatial portal, conferences, social media, and the DWMP mailbox. Alongside the portal, stakeholders were provided with a training pack and offered invites to one-on-one sessions to demonstrate how to use it.		
	UU hosted over thirty workshops with twenty-nine external stakeholders to identify 1164 potential partnership opportunities. All were reviewed for applicability to the DWMP, reducing the opportunities to 500, still substantial. The transparency shown here is to be commended.	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Figures 20 and 21
	Planning objectives were tested with stakeholders in the strategic context stage and additional planning objectives were adopted. A specific example is external sewer flood risk that stakeholders cited as a cause for concern. Also, UU responded to stakeholder views by making the targets in the pollution incidents reduction planning objective more ambitious.	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Section 4.3, Table 1
 Ofwat	All companies are required to provide sufficient and convincing evidence on the extent the engagement activities have influenced the DWMPs.	3.3.2.5	Technical Appendix 2 – Stakeholder Engagement, Section 3
	Companies should present clearer evidence for the viability of third-party collaborations – based on existing successful partnership schemes and well-established relationships with key stakeholders.	3.3.2.5	Technical Appendix 2 – Stakeholder Engagement, Section 3.7
 Greater Manchester Combined Authority	Understanding partnership priorities and outcomes is a critical objective for effective relationships. A key aspect of this is the ability to be able to share data in an open and collaborative way to drive forward integration.	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Sections 4.4 and 4.5
	(Hierarchy of interventions) This requires contributions from a wide range of organisations including Regional Flood & Coastal Committees, Local Planning Authorities and the Catchment-Based Approach (CaBA) Partnerships to name a few. This would make a difference and target campaigns locally to address the issue, in partnership with other relevant organisations.	3.3.2.3	Technical Appendix 2 – Stakeholder Engagement, Section 4.3
	More resources are needed to support Catchment Partnerships, more transparency and better communication	3.3.2.7	Technical Appendix 2 – Stakeholder


Stakeholder engagement			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 <p>Staveley with Ings Parish Council</p>	More needs to be done to engage as close to local communities as possible. Fundamentally, there needs to be recognition of the need to work with the lower tier of local government - town and parish councils. It is at this level that local problems are experienced and some potential solutions offered for consideration. This appears to happen by UU's officers on the ground but rarely at strategic level.	3.3.2.7	Engagement, Section 4.3 Statement of Response, Section 3.3.2.7
	In addition, there should be a greater emphasis on rurality, particularly in a large rural area like Cumbria, which in size is over 50 per cent of the NW.	3.3.2.7	Statement of Response, Section 3.3.2.7
	Partnership engagement at a more local level - how can this be best achieved to deliver the targets and priorities identified	3.3.2.7	Statement of Response, Section 3.3.2.7
	Consideration of a local pilot project, involving all relevant partners, to explore some of the issues identified	3.3.2.7	Statement of Response, Section 3.3.2.7
	Direct communication with strategic officers either between Parish Council representatives or with the Council as a whole	3.3.2.7	Statement of Response, Section 3.3.2.7
	Yes, potentially huge ones. Staveley with Ings Parish Council have tried to be in regular discussion with UU throughout the last 5 years, since discussions were started in earnest post Storm Desmond in 2015. At different times we have met with key personnel and also with UU's main partners. We were informed second hand of this consultation 4 working days before it was due to close	3.3.2.7	Statement of Response, Section 3.3.2.7
 <p>The Wildlife Trust for Lancashire, Manchester & North Merseyside</p>	It would be useful to have been consulted in a more targeted and collective way earlier - on the DCMP, WINEP, Drought Plan &c, and on a UU plc Nature Recovery Strategy or similar - in a joined-up, ecosystem-based approach. Perhaps specific engagement with the regional and sub-regional natural environment sector on our own terms rather than that of the company would produce better results - an open question, but one that brings us back to the geographies of Local Nature (Recovery) Partnerships	3.3.2.7	Statement of Response, Section 3.3.2.7
SENS (Sustainability)	This question implies a degree of involvement which does not apply. It is very disappointing to have been	3.3.2.7	Statement of Response,


Stakeholder engagement			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 y and Energy Network in Staveley)	excluded from what is obviously a highly significant piece of work which will have long term implications for the environment as well as for UU customers.		Section 3.3.2.7
	The Annex on Customer Engagement (TA9) is unconvincing. UU must establish wider and deeper partnerships at community level. This is particularly important in a community such as Staveley which suffered significant flooding in 2015 and, almost 7 years on, is still without even any preliminary proposals for future flood prevention. Both the Parish Council and groups such as SENS and CRKC have continued to signal their concerns about the condition of the River Kent, and the continuing problems with the sewerage system and Staveley WwTW. To have heard nothing about DWMP, despite continuing contacts over a considerable period of time, is inexplicable.	3.3.2.3-3.3.2.7	Statement of Response, Section 3.3.2.7
	As two environmental groups, we have been in discussion with both UU and the EA over recent months wrt to our concerns about (i) the health of the River Kent and (ii) flood prevention in Staveley. No-one has mentioned DWMP to us during this time, and despite a meeting with UU as recently as 5 September (when we specifically asked about future plans) we were unaware of it until a colleague emailed the link to us on 20 September. So we have no experience of any partnership working. We observe that partnership working needs to be vastly improved in two key areas: - Engagement with local environmental groups - Engagement with local communities through their elected representatives including parish and town councils. Unless this happens there is not only a democratic deficit, but also a failure to connect with significant local expertise and commitment to improving the status quo.	3.3.2.7	Statement of Response, Section 3.3.2.7
	We feel that our views and priorities have not been heard, as no-one has listened. We don't know whether the key priorities from other management plans are reflected, as we haven't seen them.	3.3.2.7	Statement of Response, Section 3.3.2.7




A.3.3 Strategic Planning Area DWMPs


Table 7 Our response to draft consultation feedback regarding the Strategic Planning Area DWMPs



Strategic Planning Area DWMPs			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Environment Agency	<p>For the Irwell SPA, it would be helpful to understand in more detail about the surface water source control measures and going forward. In order to work better with UU to deliver projects. In terms of investment in the Irwell there are clearly lots of drivers for investment to reduce flood risk including substantial investment around increasing drainage capacity and other capital interventions in some TPUs. It's important that these are aligned with the EAs capital investment programme to maximise benefits and provide efficiencies - more work needs to be done to fully understand how UU/EA projects can most effectively deliver collaboratively using relevant funding/business case rules of the two organisations. As there no specific measures identified in the plans it is not possible to comment. We would like to discuss more what surface water source control measures are being considered.</p>	3.3.3.8	Statement of Response, Sections 3.3.3.4-3.3.3.8
	<p>The Level 2 plans lack detail with the types of options that may apply to the catchment being provided only. We could not find any detail of the options (including via the customer portal), so we are unable to comment at this level of plan. On any specific at a local level as the detail is not behind each option.</p>	3.3.3.3-3.3.3.6	SPA_01 – SPA_14
	<p>For the Weaver Gowey SPU on Page 18 the BRAVA assessment for Northwich TPU the assessment under PO on Risk of flooding in a storm (1:50yr), the assessment is not significant. However, Northwich Town centre would currently flood in a 1 in 50. Under the problems characterisation Northwich isn't being identified as complex but the Alsager TPU, however local it is felt that Northwich is a more problematic catchment. The importance of the Northwich Flood Partnerships is a good point for further good work within this complex catchment. So further discussion on this would be welcomed. It is also noted on page 44 that Northwich is the only location where separation of combine sewer s the significant measures. We welcome these measures however considerations need to be made to where separated surface water flows are directed, and this doesn't simple worsen fluvial flood risk. Further discussion on this would be welcomed.</p>	3.3.3.3-3.3.3.6	Statement of Response, Sections 3.3.3.3-3.3.3.6
	<p>In the Ribble catchment document SPA_09, page 32, there are only three potential partnership opportunities identified which is very low and believed to be an underestimate. What's more it is felt that this assessment is unambitious and doesn't reflect the positive discussions from the stakeholder workshops.</p>	3.3.3.5	Statement of Response, Sections 3.3.3.3-3.3.3.6

Strategic Planning Area DWMPs			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	The lack of partnership opportunities shown in the plan, compared with the potential locations identified for collaboration at the workshops, raises the question about how the MIRA board data has been used.	3.3.1.6	Technical Appendix 2 – Stakeholder Engagement, Figure 20 and Figure 21
	Wyre outputs in document SPA_14, page 24, show only four partnership opportunities reflected in the document and this lack of partnership opportunities, compared with the potential locations identified for collaboration at the workshops, also raises the question about how the MIRA board data has been used	3.3.3.5 and 3.3.3.4	Technical Appendix 2 – Stakeholder Engagement, Figure 20 and Figure 21 and Appendix A
	With regarding being able to engage specifically in relation to the Mersey Estuary SPA. Questions have been raised about how collaboration opportunities will be identified, what forums will they be discussed and if funding strategy has been developed. There was an expectation that more potential partnership opportunities would be identified in the Mersey Estuary SPA.	3.3.3.5 and 3.3.3.4	Technical Appendix 2 – Stakeholder Engagement, Figure 20 and Figure 21 and Appendix A
	General agreement with the TPUs identified as complex in Cumbria, in that we understand there to be complex and varied flooding issues in those areas identified. The text suggests further work is required on them, and the detail was vague. It was not clear if there was any intention to develop understanding of these complex TPUs with partners (understanding multiple sources and multiple benefits).	3.3.3.5	Technical Appendix 2 – Stakeholder Engagement, Section 3.4.2
	The DWMP shows broad investment potential in different areas in different time periods, but it doesn't provide the level of detail that practitioners need to identify potential multiple benefits or areas where we can work together. Options for catchments are presented but it is not clear in most cases which options have been included and costed in the plan.	3.3.3.6	Technical Appendix 2 – Stakeholder Engagement, Sections 3.7.1.3-3.7.1.6
 Greater Manchester Combined Authority	The DWMP identifies many objectives that will address the challenges of water management but is heavy on process. Greater Manchester's interest in the DWMP consultation is focused at the second level outlined in the document: Strategic Planning Areas.	3.3.3.3-3.3.3.6	Technical Appendix 2 – Stakeholder Engagement, Section 2.3.5
	(SPA aspect of DWMP) While this does provide some level of detail at a catchment level it does not go far enough to understand delivery at a more local level.	3.3.3.3-3.3.3.6	Technical Appendix 2 – Stakeholder


Strategic Planning Area DWMPs			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	Place based planning pilots currently being delivered through the trilateral framework will help provide some of this learning.		Engagement, Section 2.3.5
 Merseyside Environmental Advisory Service	We note the Strategic Area Planning (SAP) documents provide settlement specific detail and priorities for investment. Taking these priorities forward will be key and we welcome further discussion regarding the most effective way to engage with stakeholders including alignment with existing projects and plans. The LCR is very fortunate having active Catchment Partnerships comprising a broad membership who can support implementation of new treatment and storage capacity.	3.3.3.3-3.3.3.6	Statement of Response, Sections 3.3.3.5-3.3.3.6
 Staveley with Ings Parish Council	It seems clear that smaller, rural communities are given a much lower priority - grouped together (communities < 2000) despite known and serious problems individually. The policy and no doubt its modelling, and subsequent resources are steered far too strongly towards large urban conurbation.	3.3.3.3-3.3.3.6	Statement of Response, Section 3.3.3.5
	Recognition of rural needs, even though they will never match the 'numbers' provided by urban settings	3.3.3.3-3.3.3.6	Statement of Response, Section 3.3.3.6
	Full recognition of rural communities serving a catchment e.g. Kent/Leven (SPA 06) only identifies Kendal as a named settlement. Staveley and Burneside have long histories of flooding and sewage problem but are not mentioned separately. Staveley was severely damaged in 2015 and its sewage problems are well documented with UU. It has been working with UU consistently but is not identified as a priority within the catchment.	3.3.3.3-3.3.3.6 and 3.3.3.9-3.3.3.10	Statement of Response, Sections 3.3.3.5-3.3.3.6
	A more open acceptance of the problems in specific locations e.g. Staveley WWTW is vulnerable and UU has accepted this (see earlier). The EA is currently conducting an investigation of its adequacy and the WWTW has been added to the list of concerns as part of the Green Recovery strategy. It appears in some lists but not initially on fig 5 p13, where it surely should be identified	3.3.3.3-3.3.3.6 and 3.3.3.9-3.3.3.10	Statement of Response Sections 3.3.3.3-3.3.3.12
 The Wildlife Trust for Lancashire, Manchester & North Merseyside	We welcome the holistic place-based approach proposed for the Wyre and Upper Mersey SPAs within the geographical remit of our charity and hope that we might have opportunity to be better engaged as those develop. Such an approach might offer reduced demands on core charitable capacity, at least at that geographical level, than does separate engagement on each aspect.	3.3.3.12	Technical Appendix 2 – Stakeholder Engagement, Sections 4.1-4.5

Strategic Planning Area DWMPs			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Water Resources West	To maximise the benefits available in our plans it is important that we share information about the schemes we are each developing. To this end we have appended to this response a list of ‘no regret’ actions to improve the water environment that we intend to take forward for further assessment and potential implementation. You will see for example that we already have a common interest in the Wyre catchment where improved water quality and the use of natural flood management will benefit the environment in that area. We would like to discuss this and our other schemes with you and explore where we have opportunities for collaborative working.	3.3.3.12	Statement of Response, Section 3.3.3.12






A.3.4 Alignment with other long-term strategies



Table 8 Our response to draft consultation feedback regarding alignment with other long-term strategies




Alignment with other long-term strategies			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Environment Agency	We were pleased to see that the DWMP used the same demand forecasting models as used for your WRMP, and general statements about alignment between the two plans. Maintenance of this alignment over future cycles of DWMP and WRMP will be important.	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
	We welcome reference in the plan to the Flood Coastal Erosion Risk Management National (FCERM) Strategy 2020, other frameworks and strategic plans. You also recognise the importance of key interfaces and timings for your interactions, enabling effective partnership working and collaborative planning with RMA partners in shaping your plan.	3.3.4.3-3.3.4.4	Technical Appendix 2 – Stakeholder Engagement, Section 2.3.3
	We appreciated the specific engagement with us to look at the synergies between DWMP and our own strategic plans the include elements of drainage (FRMP, RBMP).	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
	We consider the DWMP to be reasonably well aligned with other strategic plans that can dovetail into the company’s PR24 Business plan and Long-Term Delivery Strategy to deliver resilience, including asset health. The best value approach and lowest whole life cost scenarios were discussed in the DWMP where only feasible options were considered.	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4

Alignment with other long-term strategies			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 <p>Greater Manchester Combined Authority</p>	The benefits of an integrated water management approach are wide ranging, from financial and reputational through to environmental and social.	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
	The consultation refers to DWMP, River Basin Management Plans and Flood Risk Management Plans but the level of detail of how activities will be developed to deliver against all three plans is missing. This is important as we recognise that closer alignment between the plans requires changes by United Utilities and other partners at a local level, supported by changes at a national level as well.	3.3.4.3-3.3.4.4	Technical Appendix 2 – Stakeholder Engagement, Section 2.3.3
	Greater impact at the local level could be achieved through increasing the synergies between existing water management strategies and aligning their timescales. GMCA, EA and UU are already considering an Integrated Water Management Plan to support delivery of shared objectives and outcomes. Within this integrated approach, managing surface water in our urban areas is a major issue and will be even more so as the climate changes	3.3.4.3-3.3.4.4	Technical Appendix 2 – Stakeholder Engagement, Section 2.3.2.6
 <p>Lake District National Park Authority</p>	The statutory Lake District National Park Partnership Plan (management plan) and Local Plan are not recognised. They have a synergy with the DWMP: - LDNPP Plan strategies #4. Improved water quality and resources in lakes, tarns, rivers, ground waters, and sea. #17. Increased resilience to flooding. - Local Plan sets out principles of development; and #Policy 03: Development and flooding and #Policy 12: South Distinctive Area (support a public sewer between Lakeside and Newby Bridge), #Policy 13: Central and South East Distinctive Area (support a public sewer along the A591 between Waterhead and Windermere)	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
 <p>Lancashire County Council</p>	Lancashire has a Local Flood Risk Management Strategy which sets out a vision for managing local flood risks. We see a role for the DWMP to support this strategy and the action contained within its Business Plan. For example, objective 2.7 of our Strategy asks United Utilities to 'support development of an 'all source' flooding map for the North West, to place all sources of flood risk on an equal footing. This could be achieved through Drainage and Wastewater Management Plan (DWMP)' with a delivery milestone of March 2026.	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
	To achieve goals in the DWMP, it is important that United Utilities fully engage with the Local Plan process with Local Planning Authorities to safeguard land for	3.3.4.3-3.3.4.4	Statement of Response, Sections

Alignment with other long-term strategies				
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP	
	current and future flood management under the National Planning Policy Framework, and work with local landowners as key stakeholders in doing so.		3.3.4.3-3.3.4.4	
	In the same way that the DWMP is a new process for the water companies, it is also a new process for the LLFAs and we are coming to terms with the immense quantity of data, analysis, assumptions and projections that we find in UU's Draft DWMP. It is reasonable to expect that we may have overlooked something significant within the multiple documents, and that UU might adjust the Plan in ways which impact on flood risk management. We trust that our existing respectful local working relationships will enable us to inform each other of any late findings and questions arising, so that we can continue to collaborate and deliver our joint and separate flood risk management activities.	3.3.4.3-3.3.4.4	3.3.4.3-3.3.4.4	Statement of Response, Sections
 Merseyside Environmental Advisory Service	A more joined-up approach addressing these reasons through the DWMP, pending Local Nature Recovery Strategy, local planning, Environmental Land Management schemes and Catchment Partnerships through an evidenced based approach is essential to achieve the enhanced obligations of the Environment Act (2021) and recover nature.	3.3.4.3-3.3.4.4	3.3.4.3-3.3.4.4	Statement of Response, Sections
 Moors for the Future Partnership	We could not find mention within the draft DWMP of consultation with National Park Authorities (Lake District, Peak District), and therefore no mention of alignment/synergy with these bodies' own strategic management plans.	3.3.4.3-3.3.4.4	3.3.4.3-3.3.4.4	Statement of Response, Sections
 Natural England	Also, it is worth noting that Natural England encourage our strategic partners to consider the use of our Discretionary Advice Service as you develop your plans in the pre-statutory phase of DWMP.	3.3.4.3-3.3.4.4	3.3.4.3-3.3.4.4	Statement of Response, Sections
	You do not mention Local Nature Recovery Strategies within your summary of stakeholder plans – it may be worth noting that these are being created and will help inform your future iterations of the DWMP.	3.3.4.3-3.3.4.4	3.3.4.3-3.3.4.4	Statement of Response, Sections
 Peak District National Park Authority	It is unclear how the key priorities of Development Management Plans of the appropriate planning authorities have been taken into consideration. In the case of the National Parks (Lake District, Peak District and Yorkshire Dales) National Park Management Plans should also be considered along with their Local Plans.	3.3.4.3-3.3.4.4	3.3.4.3-3.3.4.4	Statement of Response, Sections
 Ribble Catchment	Much of the early part of the DWMP consultation and development process, has assumed that there is a clear	3.3.4.3-3.3.4.4	3.3.4.3-3.3.4.4	Statement of Response,

Alignment with other long-term strategies			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
Conservation Trust Ltd	picture of strategies, plans and actions for each SPA and TPU. Unfortunately the reality is that the inter related process of Public bodies, UU and other actors in the SPA are drivers, directly or indirectly for many others strategies, plans and actions. Expectation that there is a clear picture, aligned to DWMP, is unfortunately flawed. More is needed to set out publically, or certainly accessibly the priorities of those who have the biggest influence in catchment delivery, to allow others to better align and integrate their plans. Understanding the development and delivery processes of others is also key. Finally filling data and evidence gaps with empirical data, which is of an agreed standard and methodology is vital.		Sections 3.3.4.3-3.3.4.4
 Sefton Council	Alignment of objectives and funding cycles across the region. Better communication and transparency between organisations.	3.3.4.3-3.3.4.4	Technical Appendix 2 – Stakeholder Engagement, Section 3.7.1
	Better align plans and policies across the region that are all working to different time scales and areas and making stronger links and actions with issues at the coast.	3.3.4.3-3.3.4.4	Technical Appendix 2 – Stakeholder Engagement, Section 3.7.1
 The Wildlife Trust for Lancashire, Manchester & North Merseyside	Strategies and Networks required by the Environment Act 2021. That delivery will need to be in a joined-up manner across UU plc; as proposed to be piloted in this draft DWMP’s ‘Upper Mersey’ and ‘Wyre’ Strategic Planning Areas. United Utilities (UU) plc is a major landowner and has statutory powers and responsibilities, it has a key role in that delivery across its estate and activities, particularly through the Local Nature Recovery Partnerships,	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
	Demonstrable integration with UU plc’s other plans and those external plans in which it has a role are not readily apparent – though I’d be the first to concede that I may have missed something in the time available to me for comment; and, in the case of the Local Nature Recovery Partnerships, Strategies and Networks required by the Environment Act 2021 there is ongoing uncertainty and asynchrony, the Environment Bill having been repeatedly postponed in a crowded legislative programme.	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
	Specific impacts on delivery of the plan that would be consequent on a climate-related increase in invasive species in freshwater and wetland habitats in and around watercourses may be an additional	3.3.4.3-3.3.4.4	Statement of Response, Sections





Alignment with other long-term strategies			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	consideration; forming a subset of the wider global and local climate & biodiversity crisis. We also want to see more development of markets for adaptation services including, for example, nature-based solutions for flood mitigation and reduction in extreme heat effects. These markets are still largely missing at UK level. The Wyre Natural Flood Management (NFM) investment readiness project in Lancashire is interesting in that context and we look forward to reading about the findings of the 18-month pilot.		3.3.4.3-3.3.4.4
	The draft DWMP doesn't appear to address the Cheshire & Wirral, Cumbria, Lancashire, Greater Manchester, North Merseyside &c Local Biodiversity Action Plans or the emerging Local Nature Recovery Plans that are to succeed those under the terms of the Environment Act 2021.	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
 Water Resources West	We are pleased to see that you have set your assumptions of per capita consumption to be in line with the WRMP. This is a core driver for water efficiency in the WRMP.	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
	We would like our Plan to be included within your list of other strategic plans that you have considered your alignment with, as illustrated in figure 14 of your main document.	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4
	In summary, we welcome the publication of this draft plan, and commend the adaptive approach taken by United Utilities to deliver benefits to customers and the environment. We believe that there is additional value to be gained by sharing information between our respective plans and we look forward to working with you more closely in the future.	3.3.4.3-3.3.4.4	Statement of Response, Sections 3.3.4.3-3.3.4.4




A.4 Customer acceptability




A.4.1 Bill impact and customer affordability

Table 9 Our response to draft consultation feedback regarding bill impact and affordability



Bill impact and affordability			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Consumer Council for Water	We are pleased to note that the company has included with some indication of high level costs and bill impacts. Ultimately, there has to be a compromise between the company’s ambition and the impact of investment costs on customers’ bills. This should be informed by engagement with customers to establish their priorities and their willingness to pay, across all areas of expenditure not just drainage, and the pace with which they want to see improvement. It must also run in tandem with measures to protect financially vulnerable customers who may face affordability issues with increasing bills. The single water affordability scheme, which Defra is considering, is key to unlocking investment by protecting those least able to pay. We know UuW are supportive of this scheme because of the levels of deprivation in the North West combined with the programme of storm overflow work that is required by Defra’s plan.	4.3.1.3	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
 Ofwat	we did not see sufficient and convincing evidence that transparently sets out the costs required to address customers' priorities. (from bill impacts)	4.3.1.9	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
	We acknowledge that you have provided the components of potential bill impacts by 2030 and 2050 for your region.	4.3.1.3	Main Document, Section 11.3, Table 28
 Copeland Borough Council	It is always difficult ask people to pay more when they see no direct benefit. If people aren't suffering sewage pollution for instance, they may not see paying more, as a direct benefit even when the investment is reducing the risk of them suffering sewage pollution.	4.3.1.6	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
 Greater Manchester Combined Authority	While welcoming national targets to address storm overflows GMCA would also encourage the Government to develop an approach that is sensitive to the geographical variations in the distribution and frequency of storm overflows and the capacity of water customers to withstand higher bills.	4.3.1.3-4.3.1.6	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8



Bill impact and affordability			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	Many of the most deprived areas of Greater Manchester, and North West England more widely, are at risk of flooding and where this is specifically surface water there is the added risk of sewer flooding during extreme flash flooding events. GMCA would encourage a flexible approach to determining future water bills to ensure that less advantaged communities do not receive excessively high bill increases but that they are able to benefit from improvements to drainage infrastructure. This may involve equalising or harmonising water bills for customers across England and therefore levelling-up the quality of the water environment for the benefit of people across the country.	4.3.1.3-4.3.1.6	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
 Lancashire County Council	Customers will understand the choices you face, and the cost of incorporating environmental stewardship and future resilience into projects. As the draft DWMP identifies at 7.2.3: gaining support for larger bill increase will require clear demonstration of the benefits of investment. Such engagement will support any case you may make for different national funding regimes. 'Levelling Up' might be an appropriate consideration in respect of extra costs in the industrialised North West region.	4.3.1.8	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
 Peak District National Park Authority	If customers are being expected to fund planned service improvements then it is important that they are fully engaged. Failure to do so may result in a backlash against increased water bills. This is particularly important at the current time during an unprecedented cost of living crisis and when various water companies have been criticised over their behaviour during the recent drought.	4.3.1.8	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
 Ribble Catchment Conservation Trust Ltd	With the cost of living crisis, increases in bills need to be relatively. The cost of energy is going to rise significantly with no tangible to the customer material change to the outcome of energy provision. An relatively small increase in water bills would see significant improvements, that are tangible. This is an important part in the engagement and importantly the behavioural change process. Valuing water more, as the increased value will see improvements, and self reinforcement.	4.3.1.3-4.3.1.9	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
	A step change is clearly required, not least from the plan, and we have underinvested, as a nation, in our water infrastructure for to long. This sets out the need, but the plan in reality shows that we could and should go further - bill impact of ~£8/month by 2030, seem an	4.3.1.3-4.3.1.9	Technical Appendix 9 – Customer Engagement, Sections 9



Bill impact and affordability			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	extremely modest increase. If we want resilient water services provision, that is a positive to the environment rather than treading water or worse allowing it to deteriorate, this plan sets out the need to focus investment.		and 10, Paragraphs 9.1.1-10.3.8
 Staveley with Ings Parish Council	It (the plan) must also take into account the balance between customer cost, use of assets and value for service. Currently, this balance is at severe risk and customers general belief is that it is out of balance	4.3.1.8	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
 Advisor to Holker Estates	The level of Bills should not be the main factor to influence policy - environmental issues are more important in the long run.	4.3.1.3	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
 SENS (Sustainability and Energy Network in Staveley)	Interesting research finding, but perhaps views have shifted after the last few months of terrible publicity for the water companies together with impact of the cost of living crisis. An extra £55 pa may not seem much to senior staff in UU, but it's a lot to a pensioner or a low income family. And why assume that the investment will inevitably come through increased bills? This needs to be discussed - and options offered. Customers are likely resist what many will regard as a substantial increase in their bills unless: - UU accept that by no means all the additional investment should come through customer bills. - The water companies demonstrate that they are acting in the public interest to prioritise investment in failing systems over shareholder gain and what are regarded as eye watering salaries for the CE and directors. - There are definite commitments to clear and tangible benefits within defined timescales for them and their local community.	4.3.1.3-4.3.1.9	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8

A.4.2 Customer views

Table 10 Our response to draft consultation feedback regarding customer views




Customer views			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 <p>Consumer Council for Water</p>	<p>We are pleased to note that the company has included with some indication of high level costs and bill impacts. Ultimately, there has to be a compromise between the company’s ambition and the impact of investment costs on customers’ bills. This should be informed by engagement with customers to establish their priorities and their willingness to pay, across all areas of expenditure not just drainage, and the pace with which they want to see improvement. It must also run in tandem with measures to protect financially vulnerable customers who may face affordability issues with increasing bills. The single water affordability scheme, which Defra is considering, is key to unlocking investment by protecting those least able to pay. We know UUK are supportive of this scheme because of the levels of deprivation in the North West combined with the programme of storm overflow work that is required by Defra’s plan.</p>	4.3.2.3-4.3.2.6	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8
	<p>The draft DWMP is, by its nature, a technical and complex document that is not very accessible to a wider audience. It is important that customers and non-technical stakeholders can understand and contribute to the company’s plans. We are therefore encouraged that the company provided an easy to understand summary of the draft plan and of the priority areas for this wider audience.</p>	4.3.2.3	Customer Summary and Non-Technical Summary
	<p>The company has a comprehensive suite of webpages about the DWMP. This sets out what a DWMP is and the process of its development. The site is broken down into river catchment areas catchments, which will help focus attention of local interest groups. We would like to see the company develop these documents and webpages further in the final plan, notably to include likely bill impacts in the customer document and perhaps the use of videos and clips to make the plan easier to access and understand.</p>	4.3.2.4	Customer Summary and our DWMP corporate webpage
	<p>Storm Overflows and sewer flooding are the most visible to some customers and are seen as priorities by them. But, the company needs to draw on the findings of customer research to establish what are priorities for the wider customer base.</p>	4.3.2.3	Technical Appendix 9 – Customer Engagement, Section 4.3
 <p>Groundwork Greater Manchester</p>	<p>Our river water quality awareness research can give some insight. Internal sewer flooding is unacceptable in any circumstances because of its impact on the individuals and families who suffer. Minimising storm overflow discharges and wider sewer flooding can be seen as directly affecting the level of trust consumers</p>	4.3.2.3	Technical Appendix 9 – Customer Engagement, Section 4.3


Customer views			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	have in the company. Our Water Matters research has seen satisfaction in sewerage services decline significantly during the last year with overall satisfaction with at 78 per cent compared to 85 per cent in the previous year. This has occurred during a time when storm overflows have featured heavily in the media.		
	If behaviour change is a key action, then engaging with customers is important. It will be important for UU to work closely with other environmental NGOs in the area who are experienced in community engagement and behaviour change.	4.3.2.3	Statement of Response, Section 4.3.1.8
 Stormwater Shepherds UK	I think it's important to keep talking to customers, although it may be the case that charges have to go up, and you have to manage that message, rather than always responding to calls for lower charges. The level of investment that is necessary in England to restore the quality of our rivers & seas is huge and the money has to come from somewhere.	4.3.2.3	Statement of Response, Section 4.3.2.5
 Wyre River Trust	Engagement with customers is vital to ensure that their views are considered, and they know why bills may have to increase to support a more sustainable future.	4.3.2.3	Technical Appendix 9 – Customer Engagement, Sections 9 and 10, Paragraphs 9.1.1-10.3.8

A.4.3 Base versus enhancement

Table 11 Our response to draft consultation feedback regarding base versus enhancement



Base versus enhancement			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Environment Agency	we are disappointed that the scenario approaches do not include base maintenance to maintain asset health for now or in the future.	4.3.3.3	Technical Appendix 8 – Programme Optimisation, Section 5.8
	The scenario approaches do not include base maintenance to maintain asset health for now or in the future.	4.3.3.3	Technical Appendix 8 – Programme




Base versus enhancement			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
			Optimisation, Section 5.
	Generally, yes. Climate change and growth are the two main drivers of change and they have been considered in the plan. The plan also needs to recognise the need to tackle the underinvestment of the past, so we do have concerns that investment on asset maintenance does not transparently form part of the plan. Our understanding of the concept of DWMPs is that they should identify and address all drainage and wastewater management risks irrespective of funding source.	4.3.3.3	Technical Appendix 8 – Programme Optimisation, Section 5.
 Ofwat	We note that you have identified the need for significant change in maintenance investment in your region to continue the improving service trend and to build asset resilience in the longer-term. However, it is unclear from your plan whether you consider funding for this activity falls under base and / or enhancement. You should clearly set out how asset management and optimisation (base expenditure activities) can address some of your risks, such as, providing additional hydraulic capacity headroom in the system, as part of a hierarchy of options, before recommending enhancement schemes. You should ensure that you are able, and continue to be able, to meet all legal obligations, both now and in the future.	4.3.3.3	Technical Appendix 8 – Programme Optimisation, Section 5.
	We note that you selected a stable performance scenario to inform your BRAVA results. However, it was not clear in your dDWMP how you differentiate between what are base maintenance or enhancement requirements.	4.3.3.3	Technical Appendix 8 – Programme Optimisation, Section 5.
	we are disappointed that the scenario approaches do not include base maintenance to maintain asset health for now or in the future.	4.3.3.3	Technical Appendix 8 – Programme Optimisation, Section 5.

A.5 Storm overflows

A.5.1 Timescales, milestones and costs

Table 12 Our response to draft consultation feedback regarding timescales, milestones and costs for storm overflows



Timescales, milestones and costs for storm overflows			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Environment Agency	<p>There is an additional £18-20bn identified for addressing storm overflows which is focussed almost wholly on providing additional storage, with little or no emphasis on nature-based solutions and surface water separation.</p>	<p>5.3.1.4- 5.3.1.8</p>	<p>Main Document, Section 10.3, Paragraph 10.3.1.2</p>
	<p>Based upon Environment Agency calculations using the total cost provided by United Utilities, the average cost to resolve each overflow to Defra’s targets equates to £12.8 million/overflow – this is considerably higher than the average provided by other companies, more transparency in how this value was reached is needed.</p>	<p>5.3.1.8</p>	<p>Main Document, Section 10.3</p>
 Ofwat	<p>With regards to Defra’s storm overflow discharge reduction plan, we acknowledge that you have attempted to provide a separate cost estimation for the impact of these targets in your region and that you have developed tools and cost curves that allow you to test alternative scenarios. However, we expect to see a more detailed and robust timeline (showing milestones and prioritisation) and evidence on the costs for these storm overflow schemes in your final DWMP.</p>	<p>5.3.1.8</p>	<p>Main Document, Section 10.3</p>
	<p>All English water companies need to address Defra’s storm overflow reduction plan targets in their final DWMPs and should clearly set out how they will achieve, or exceed, them along with the costs and associated benefits to the environment and society.</p>	<p>5.3.1.8</p>	<p>Main Document, Section 10.3</p>
	<p>We expect your final plans to incorporate all the required storm overflow targets and clearly set out how these will be delivered with the right best value solutions</p>	<p>5.3.1.8</p>	<p>Main Document, Section 10.3</p>
	<p>We acknowledge that you have provided your provisional view and set out the storm overflows cost separately in your dDWMP.</p>	<p>5.3.1.3</p>	<p>Main Document, Section 10.3</p>
	<p>In your final plan you should provide further clarity around the timeline and costs required to deliver against these (storm overflow) targets.</p>	<p>5.3.1.8</p>	<p>Main Document, Section 10.3</p>
	<p>we expect English companies' DWMPs to incorporate the interventions required to meet the Defra storm overflow reductions plan targets - companies should include a range of scenarios and costs - and where possible, costs should indicate the impact on affordability of bills</p>	<p>5.3.1.8</p>	<p>Main Document, Section 10.3</p>
	<p>I think overflow improvements are going to be essential but the extent of them will always be unknown because even the requirements embedded in the new Environment Act could be changed by future</p>	<p>5.3.1.3</p>	<p>Main Document, Section 10.3</p>
 Stormwater Shepherds UK	<p>I think overflow improvements are going to be essential but the extent of them will always be unknown because even the requirements embedded in the new Environment Act could be changed by future</p>	<p>5.3.1.3</p>	<p>Main Document, Section 10.3</p>

Timescales, milestones and costs for storm overflows




Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	Governments if they are proving to be too onerous and other priorities evolve as climate change bites.		

A.5.2 Water quality monitoring

Table 13 Our response to draft consultation feedback regarding water quality monitoring



Water quality monitoring



Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Environment Agency	While we welcome United Utilities assessment to all Defra’s storm overflow discharge reduction plan targets within its range of scenarios, more detail on continuous water quality and monitoring is expected for the final submission.	5.3.2.3-5.3.2.11	Statement of Response, Sections 5.3.2.3-5.3.2.11
	We would also welcome more detail on monitoring requirements for overflows, including 100 per cent EDM coverage by the end of 2023, near real time reporting of EDM and continuous water quality monitoring requirements. This increased granularity of storm overflow understanding from stakeholders and the public should be acknowledged in adaptive planning.	5.3.2.3-5.3.2.11	Statement of Response, Sections 5.3.2.3-5.3.2.11
 Ofwat	We note that you have acknowledged the requirements of undertaking water quality monitoring and that you plan to review this element further in your final DWMP. As your dDWMP submission does not include evidence on how this will be achieved, we are unclear on the scale of the requirement and your ambitions to deliver it. Therefore, you should provide detailed evidence on your approach and milestones to achieve this requirement as part of your final plan	5.3.2.3-5.3.2.11	Statement of Response, Sections 5.3.2.3-5.3.2.11
 Groundwork Greater Manchester	Rivers should be achieving WFD good ecological status/potential in the Irwell Catchment and this should be sustainable in the future given potential impact of climate change and population growth	5.3.2.3-5.3.2.11	Statement of Response, Sections 5.3.2.3-5.3.2.11


A.6 Wider strategic ambition of the DWMP





A.6.1 Planning objectives




Table 14 Our response to draft consultation feedback regarding planning objectives



Planning objectives			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Consumer Council for Water	The company has identified the major challenges its DWMP must address now and in the future.	6.3.1.3	Main Document, Sections 5.3 and 5.4, Paragraphs 5.3.1-5.4.6
 Environment Agency	We commend the specific engagement sessions that UU held to explore and finalise the additional bespoke planning objectives.	6.3.1.3-6.3.1.8	Main Document, Sections 5.3 and 5.4, Paragraphs 5.3.1-5.4.6
	However, it is disappointing and surprising that this engagement produced only two additional bespoke planning objectives (External sewer flooding and Sewer flooding of open spaces) and a more demanding target for reducing pollution incidents. But we note that an additional six bespoke ‘assessments’ have been incorporated into the BRAVA analyses (DWF compliance, Multiples of treated flow compliance, sewer blockages, sludge treatment capacity, no deterioration, bathing and shellfish waters). We are unsure of the distinction here between bespoke planning objectives and bespoke planning assessments as both were incorporated into BRAVA risk analyses. It seems the former resulted from stakeholder engagement whereas the latter didn’t.	6.3.1.3-6.3.1.8	Main Document, Sections 5.3 and 5.4, Paragraphs 5.3.1-5.4.6
	Discussion of the bespoke planning assessments with stakeholders would have been beneficial and would most likely have led to their more formal adoption as objectives. We would like to understand UU’s thinking here. We would like to see the additional six bespoke assessments adopted as bespoke planning objectives.	6.3.1.3-6.3.1.8	Main Document, Sections 5.3 and 5.4, Paragraphs 5.3.1-5.4.6
	We are surprised that the stakeholder engagement on planning objectives produced only two bespoke planning objectives (although we note that a further six bespoke ‘assessments’ have been incorporated into the BRAVA analysis). We are unclear of the difference between bespoke objectives and assessments given both feature in the BRAVA risk categorisation.	6.3.1.3-6.3.1.8	Main Document, Sections 5.3 and 5.4, Paragraphs 5.3.1-5.4.6
	We are unclear of the difference between bespoke objectives and assessments given both feature in the BRAVA risk categorisation.	6.3.1.3-6.3.1.8	Main Document, Sections 5.3 and 5.4, Paragraphs 5.3.1-5.4.6

Planning objectives			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	We are surprised that the stakeholder engagement resulted in only two additional bespoke planning objectives.	6.3.1.3-6.3.1.8	Main Document, Sections 5.3 and 5.4, Paragraphs 5.3.1-5.4.6
	We support the addition of the two bespoke planning objectives to the six national planning objectives but we question whether the list is complete. We are surprised that the stakeholder engagement resulted in only two additional bespoke planning objectives. By naming your three 'planning objectives' as planning objectives creates confusion with the 6 national planning objectives in the Water UK guidance document.	6.3.1.3-6.3.1.8	Main Document, Sections 5.3 and 5.4, Paragraphs 5.3.1-5.4.6
	The long term priority is to reduce the risk of all planning objectives (national and bespoke) to risk band 0 in a way that is affordable and has the support of stakeholders and customers. The key short term priorities are to resolve the issues of the most frequently spilling storm overflows and legal compliance.	6.3.1.3-6.3.1.8	Main Document, Sections 5.3 and 5.4, Paragraphs 5.3.1-5.4.6
	The DWMP process sets out in a logical sequence how to assess risk at the scale of Tactical Planning Units (TPUs) and then facilitates an integrated approach to manage and mitigate those risks through the BRAVA analyses. We think the long-term aim should be to reduce all of the risks to Band O in all TPUs. To do will require a combination of meeting the three priorities listed (there is a need to be clear on terminology - they are not DWMP planning objectives), but legal compliance should obviously take priority.	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8
 Greater Manchester Combined Authority	The Greater Manchester Combined Authority (GMCA) supports the aspirations within the draft Drainage and Wastewater Management Plan (DWMP), which supports Greater Manchester's ambition to address water management and climate change impact through an integrated water management approach.	6.3.1.3-6.3.1.8	Statement of Response 6.3.1.7-6.3.1.8
	Access to water resources, helping nature recover and the management of flood risk to ensure our infrastructures are resilient to future climate change are all priorities identified in the DWMP that support the delivery of the 5 Year Environment Plan and Infrastructure Framework for Greater Manchester.	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8
	DWMP key objectives includes reduce risk of sewer flooding and protect restore and improve natural environment. To deliver resilient systems that meet	6.3.1.3-6.3.1.8	Statement of Response, Sections


Planning objectives			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	operational and other pressures and minimise system failures, achieving volume reduction into the network is key.		6.3.1.7-6.3.1.8
 Groundwork Greater Manchester	Specific reference is needed (in the planning objectives) to reducing the potential for CSO discharges into watercourses.	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8
 Lake District National Park Authority	Improving water quality and supporting the restoration of natural river systems to deliver the planning objectives, environmental gain, addressing climate change and reducing flood risk through catchment management investments	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8
 Moors for the Future Partnership	Public education that leads to long term behavioural change, is difficult to implement, but we agree that it is important to act in this sphere. Catchment restoration works carry more certain NFM benefits. It is difficult to order these two activities in the correct priority.	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8
	The Moors for the Future Partnership is an environmental organisation and we obviously regard the protection and restoration of the natural environment as vital to addressing the challenges posed by climate change and continued provision of ecosystem services. These include carbon sequestration and the avoidance of carbon loss, the provision of clean water and NFM benefits, all of which directly and indirectly contribute towards fulfilment of UUW's corporate objectives. Success in this arena will naturally contribute towards your third objective of the reduction of sewer flooding, through provision of NFM benefits from the upper catchment works. As a corporate entity, you have to achieve the first objective listed; it is your business. Realistically it is difficult to single out any one of these objectives as the highest priority, because they are all essential if acceptable provision of service is to be maintained into the mid 21st century and beyond. However, failure to protect and restore the natural environment will increase the costs and challenges posed when addressing the other two priorities.	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8
 Ribble Catchment Conservation Trust Ltd	Many of the legal obligations arise from flawed data, that places a requirement to act to restore to or react to remediate to the incorrect point in time. Legal obligations is the obvious means approach, however adopting something similar to biodiversity net gain, with a Legal Obligation + approach would be better.	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8




Planning objectives			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Warrington Borough Council	Reduction in flood risk to customers without passing the risk via transfer of assets to other RMA's / Customers via appropriate investment/resources to maintain / replace existing aging infrastructure.	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8
 Wyre River Trust	The improvement of catchment resilience to periods of high flow, drought, and climate change. This will support healthy ecosystems which are in themselves resilient and natural, therefore supporting an environment which has a wide range of benefits for nature and local communities.	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8
 Customer	Improving the environment should be your first objective - reduce pollution, increase trees in catchments and support your upland estate to produce clean, low cost, high environment water. done well your environmental work will reduce costs and increase resilience across the UU estate.	6.3.1.3-6.3.1.8	Statement of Response, Sections 6.3.1.7-6.3.1.8



A.6.2 Data and methodologies for assessing the risk



Table 15 Our response to draft consultation feedback regarding data and methodologies



Data and methodologies			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Environment Agency	However, only current flood risk to wastewater assets is assessed, missing future risk as a result of climate change and urban creep. A risk noted by one of the local PSO teams, is that the Eden catchment, which is considered high risk for future flood flows, was identified as being resilient to fluvial and coastal flooding, but this does not include future risk. (In reference to resilience methodologies).	6.3.2.7-6.3.2.10	Statement of Response, Sections 6.3.2.9-6.3.2.10
	This could be improved in future by incorporating future (river) flows into the environmental quality assessment. (Approach to climate change)	6.3.2.7-6.3.2.10	Statement of Response, Sections 6.3.2.9-6.3.2.10
	Only current flood risk to wastewater assets is assessed. We could not see an assessment of future risk due to climate change, growth and urban creep (in response to resilience assessments).	6.3.2.7-6.3.2.10	Statement of Response, Sections 6.3.2.9-6.3.2.10

Data and methodologies			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	Water companies who are developing Drainage and Wastewater Management Plans will need to include the impacts of their wastewater management on groundwater to ensure they do not cause polluting impacts on groundwater resources, habitats and the wider environment.	6.3.2.4-6.3.2.6	Statement of Response, Sections 6.3.2.9-6.3.2.10
	water quality modelling does not include a wide range of impacts such as a consideration of how reduced future river dilution is likely to lead to more stringent permits.	6.3.2.7-6.3.2.10	Statement of Response, Sections 6.3.2.9-6.3.2.10
 Friends of the Lake District	We are concerned that UU is relying on a 2017 climate change model when climate change driven incidents across the world are demonstrating that climate change is happening faster and its impacts are far more severe than anticipated by the models. For example the 40°C reached in many places in England in July 22 was not forecast to be achievable in the country until the 2050s. Climate change appears to be exceeding the worst case scenarios put forward in the modelling and on this basis, UU really needs to be looking at the worst-case scenario figures that have come out of the models rather than relying on the middle ground or best case scenario. We have concerns that there are real problems with intermittent discharges in the Lake District and other water bodies outside of the national park. The current state of Windermere is pretty indicative of the problems which are arising that have not been properly addressed by UU. UU should consider adding energy and materials supply crisis plus Brexit as drivers for change.	6.3.2.7-6.3.2.10	Statement of Response, Sections 6.3.2.7-6.3.2.10
 Groundwork Greater Manchester	Omissions we have noticed: currently no reference to community engagement with respect to misconnections or why you should not pave or deck over your garden - this needs a specific reference. Also, where is the reference to working with businesses to help reduce polluted water entering the sewer network, e.g., car washes.	6.3.2.9-6.3.2.10	Statement of Response, Sections 6.3.2.9-6.3.2.10
 Lancashire County Council	The 25-year horizon is sufficient for the purposes of the current understanding of DWMP. However, given the significance of climate change, as a driver, it would be good practice to look further ahead than just 2050, in parallel with the EA's climate change epochs. It would also be appropriate for UU plc to consider aligning the rainfall predictions used for sewerage design and resilience testing to those rainfall predictions used by	6.3.2.7-6.3.2.10	Statement of Response, Sections 6.3.2.7-6.3.2.10



Data and methodologies			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	<p>the Local Planning Authorities and Lead Local Flood Authorities for assessing the surface water drainage and flood risk implications of development.</p>		
	<p>The applied rainfall changes are relevant in principle (UKCP09 and UKWIR report 2017, with a quick check of implications of UKCP18). However, DEFRA released new climate change allowances in May 2022: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances. Recognising that the DWMP document was probably too advanced to be revisited at that point in time, we would rather the DWMP was published with the latest climate change allowances built in as the changes to surface water are significant and therefore could have potential to impact on plan delivery at an operational level if not built in now. A rolling review cycle should be established to build new rainfall predictions frequently into modelling, using the latest DEFRA climate change advice. It would have been appropriate to make reference to sea level rise and siltation at the coast, as these will impact on pumping operations around the NW coast, also to groundwater changes, as these will impact on infiltration to piped networks and ordinary watercourses which may be entwined with the piped networks. Do demographics of a population have any bearing on domestic consumption/discharge of water into the sewerage system? If they do, it would be relevant to consider the impact of changing demographics particularly any predicted changes in age & health profile of the population. Micro-level energy generation from water features on developments i.e. SuDS components, and property-level water resource management e.g. grey water recycling, farming lagoons etc.</p>	6.3.2.7-6.3.2.10	Statement of Response, Sections 6.3.2.7-6.3.2.10
 Natural England	<p>There appears to be no mention of the impact on the marine environment nor coastal designations affected by discharge flows from the Alt Crossens nor Douglas areas. How are you considering coastal impact across all of your catchments that discharge directly or adjacent to the coast? We cannot see specific mention of any environmental designations in the Strategic Planning areas that we seen. please could you confirm how you have taken these into account?</p>	6.3.2.7-6.3.2.10	Statement of Response, Sections 6.3.2.9-6.3.2.10
 Peak District National	<p>The approach taken does try to allow for different scenarios and does acknowledge where there are gaps, including in relation to Time series rainfall data and</p>	6.3.2.7-6.3.2.10	Statement of Response, Sections



Data and methodologies			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
Park Authority	UKCP18 projections for overflows. It might also be worth considering Defra / Natural England's commitments to a national and local Nature Recovery Networks. United Utilities has a role to play in the delivery of this and it is particular pertinent to how drainage and waste water are managed.		6.3.2.7-6.3.2.10
 Warrington Borough Council	Understanding and knowing the asset is critical to any asset management approach. Looking at the Statutory Sewer Mapping, this is an area of possible improvement and investment should be undertaken.	6.3.2.7-6.3.2.10	Statement of Response, Sections 6.3.2.9-6.3.2.10
 SENS (Sustainability and Energy Network in Staveley)	This is a technical question. What we would ask is how the results are derived as there seems to be a mismatch between the information available and the score. For example, why, among the Kent Leven TPUs, Staveley is regarded as only a potential area of focus for storm overflow performance and for the WwTW? This seems extraordinary as: - Data for 2019/20 show that storm overflow discharges occurred on average on most days - Staveley WwTW has received no investment since 1999, and, on a recent visit, UU themselves accepted the actual and potential problems. These concerns are also recognised by the EA and Ofwat. - It seems that the WwTW can only cope by exporting sewage to another WwTW on several days each week. In addition Table 5 attributes a score of more resilient to Staveley. It is not at all clear on what this is based.	3.3.3.5	Statement of Response, Sections 6.3.2.9-6.3.2.10




A.6.3 Water quality



Table 16 Our response to draft consultation feedback regarding water quality



Water quality			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Burneside Parish Council	Stopping sewage overflows into watercourses and streets.	6.3.3.3-6.3.3.5	Statement of Response Section, 6.3.3.10
 Friends of the Lake District	In Burneside, Cumbria sewage regularly overflows from the manhole at Steeles Row. This is nearby to properties and is extremely unpleasant for the local community and has been an ongoing issue for a considerable amount of time. There is also a risk of this	6.3.3.16-6.3.3.17	Statement of Response, Sections

Water quality			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	overflow running into the adjacent river Kent which is a SSSI.		6.3.3.10-6.3.3.17
	There needs to be a target for removing phosphates from discharges into still waters. Phosphate induced algal blooms are a major problem in the Lake District and have an impact on ecology due to decreasing oxygen levels in the water and on bathing water and recreational use of lakes. There doesn't appear to be any target for phosphate removal and there should be because of the damage it is causing to bathing water quality and aquatic species and habitats	6.3.3.12-6.3.3.15	Statement of Response, Section 6.3.3.10
	As stated in previous answers, the water quality in the Lake District, particularly in Windermere and catchment-based protected sites needs addressing ASAP. The state of Windermere this year has been terrible and While the Love Windermere partnership is a good start UU and partners need to be more honest about what is going into the lake from the Ambleside and Windermere treatment works.	6.3.3.12-6.3.3.15	Statement of Response, Sections 6.3.3.10-6.3.3.15
 Greater Manchester Combined Authority	On page 3, you state that there has been significant improvements to bathing waters, protected habitats and rivers. This is not the case in the Lake District and Cumbria which have a significant number of water-based SAC and SSSIs and other lakes and rivers that are in unfavourable and unfavourable declining condition. This does not square with your claim that the situation is improving. - It is concerning that the Kent-Leven DWMP does not consider the Ambleside or Windermere Storm Overflow performances to be of concern (Table 2 Environmental BRAVA results) on the basis that the Lake is very obviously polluted with phosphorus and other contaminants coming from WwTW discharges. The poor water quality demonstrates that there is an issue and for the assessment to rate it as of no concern is disquieting. There needs to be a conversation about why this assessment has been made.	6.3.3.12-6.3.3.15	Statement of Response, Section 6.3.3.10
 Groundwork Greater Manchester	A reduction in combined sewer overflow spills and associated improvement in water quality are only (part of) one component of WFD classification. An increase in class requires all factors to be considered including tackling physical modifications which is very challenging, especially in urban areas.	6.3.3.3-6.3.3.5	Statement of Response, Section 6.3.3.10


Water quality				
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP	
 Merseyside Environmental Advisory Service	Impacts of in-river chemical loads particularly in relation to more frequent periods of prolonged dry weather and drought	6.3.3.9	Statement of Response, Section 6.3.3.10	
	Nationally nutrient neutrality is an emerging issue. Catchments and national international designated sites (formerly European Sites) within the LCR are not currently identified as sensitive in terms of nutrient neutrality. However, nitrate and phosphate enrichment are issues affecting the water quality status of our waterbodies in our catchments. The DWMP and WINEP can help address these water quality issues and reasons for not achieving 'good' ecological status through investment in nature-based (water management) solutions.	6.3.3.10	Statement of Response, Section 6.3.3.10	
 Peak District National Park Authority	Ecological and human health impacts from plastic pollution is also an increasing threat and a strategic approach to design and capacity of drainage systems working in tandem with awareness raising campaigns is needed as part of the DWMP. A very brief read of consultation documents suggests there is limited approaches set out to tackle this endemic issue.	6.3.3.8	Statement of Response, Section 6.3.3.10	
 Stormwater Shepherds UK	The ongoing drought coupled with extreme rainfall has resulted in widely reported release of untreated effluent across the UK into water courses that are already environmentally challenged due to low rainfall. This is unacceptable and addressing this should be given extremely high priority. Ultimately, the health of our watercourses affects the health of the wider environment and the health and well-being of the customers of water companies.	6.3.3.9	Statement of Response, Section 6.3.3.10	
	The plans should consider the pollutant load conveyed into the water environment by UU owned surface water sewers. They often convey road runoff and urban drainage into rivers & streams and cause pollution but they have been left out of the DWMPs and this is a serious oversight.	6.3.3.8	Statement of Response, Section 6.3.3.10	
 Customer	For lake windermere not to be a sewage pond	6.3.3.12-6.3.3.15	Statement of Response, Section 6.3.3.10	
 Customer	We pay United Utilities a large amount of money to TREAT sewage. There should be no licence to discharge it untreated. I go canoeing on the River Goyt at Marple	6.3.3.3-6.3.3.10	Statement of Response,	

Water quality			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	and I am sick of picking up wet wipes from bushes on the bank at the Canoe Club		Section 6.3.3.10
 Customer	Why are there no fish in the Ladybrook stream and why are there no fresh water plants	6.3.3.3-6.3.3.10	Statement of Response, Section 6.3.3.10
 Other	on page 3, you state that there has been significant improvements to bathing waters, protected habitats and rivers. This is not the case in the Lake District and Cumbria which have a significant number of water-based SAC and SSSIs and other lakes	6.3.3.12-6.3.3.15	Statement of Response, Section 6.3.3.10

A.6.4 Strategic Environmental Assessments (SEA)

Table 17 Our response to draft consultation feedback regarding Strategic Environmental Assessments






Strategic Environmental Assessments			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Environment Agency	The environmental report sets out comprehensively the assessment process and the findings	6.3.4.2-6.3.4.3	C004 Strategic Environmental Assessment
	it (the environmental report) would benefit from more detail on the mitigation measures.	6.3.4.2-6.3.4.3	C004 Strategic Environmental Assessment



A.6.5 Other considerations of the DWMP




Table 18 Our response to draft consultation feedback regarding other considerations of the DWMP






Other considerations of the DWMP			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Consumer Council for Water	Climate change and its impact on weather patterns – particularly more extreme rainfall patterns – is likely to exacerbate many of the other factors that the company’s Plan will need to take into account both in managing wastewater and minimising its impact on the wider environment. The company will also need to deal effectively with customers’ expectations and	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10








Other considerations of the DWMP			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	consumers’ growing concern about safeguarding of the environment. It is difficult to prioritise the options given as this seems to indicate some can be of less priority when in reality all are important. Your Systems Thinking approach is the best way to approach this problem.		
 Environment Agency	It is good to see a technical appendix on resilience and wider risks being assessed including coastal/river erosion, land stability and outfall locking.	6.3.5.3-6.3.5.11	Technical Appendix 6 - Resilience
	The issue of climate change and how to plan for it is largely well covered	6.3.5.3-6.3.5.11	Technical Appendix 5 – Assessing Future Risk
	The issue of climate change and how to plan for it is largely well covered in Technical Appendices 5 (Assessing Future Risk) and 6 (Resilience), including associated risks, and how carbon is accounted for in future options.	6.3.5.3-6.3.5.11	Technical Appendix 5 – Assessing Future Risk and Technical Appendix 6 - Resilience
	Water companies that contain ‘nutrient advice areas’ are expected to assess potential nutrient neutrality risks because of present and future pressures and co-develop appropriate mitigation options with stakeholders. Natural England have provided local planning authorities tools and guidance on ‘nutrient neutrality’ to mitigate the impact of nutrient pollution so that development can proceed without detrimental downstream effects, especially to designated sites. There is also expected to be a statutory duty for water companies to upgrade wastewater treatment works to the highest technically achievable limits (TAL) by 2030 in nutrient neutrality areas. As part of the Levelling Up and Regeneration Bill, water companies will be required to undertake these upgrades in a way that tackles the dominant nutrient(s) causing pollution at designated sites. The plan is expected to detail the options needed to address areas of highest risk.	6.3.5.9	Statement of Response, Section 6.3.5.10
 Friends of the Lake District	There is a need for more resilient water-based habitats for nature and also for people as * climate change is already impacting on water habitats * the water environment is essential for the physical and mental health and wellbeing on the north west's population (see the recent growth in wild swimming and water sports for an idea of how much the public value their rivers, lakes and seas) The current rash of water pollution incidents are	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10



Other considerations of the DWMP				
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP	
	<p>unacceptable, the situation is getting worse, not better. A dry summer and then heavy rain episodes are likely to be the reason for this, but it's all predicted as part of future climate change weather patterns and so shouldn't have come as a surprise.</p> <p>UU are going to need to ramp up their game with regard to accelerating climate change impacts, as the world is fast heading to a 2oC+ future meaning more incidences of significantly worse extreme weather events. Weather has become more unpredictable and severe even over the past 15 years, so well within the 25-year timespan of this plan. Cumbria and the north west has already seen more climate impacts than most of the rest of the UK, and it's an indication of things to come. UU need to be building climate resilience for storms and flooding which will be significantly worse than the average winter storms in the region. If future climate change is not accounted for, then the system will to fail more often</p>			
	<p>Implement a scheme to issue householders and businesses with water-butts and installation kits in order to intercept rainwater similar to the way local authorities have issued composters to reduce the need to collect garden waste</p> <p>Work with local authorities and developers to encourage rainwater harvesting to be included in new developments.</p> <p>Offer grants or incentives in the form of water bill reductions for installation of green roofs</p> <p>Provide householders and businesses with information about garden soakaway creation.</p> <p>Lobby in conjunction with local authorities to ensure that the planning legislation around paving of front and back gardens is enforced</p>	6.3.5.10	Statement of Response, Section 6.3.5.10	
 Greater Manchester Combined Authority	We would also highlight that new developments should not be allowed to contribute further pressure on the network and cause additional adverse sewage overflows.	6.3.5.10	Main Document, Table 4	
 Lancashire County Council	Generally we agree that the preferred plan adequately addresses risk. However better accommodation is required of up to date government climate change data and allowances and alignment with EA/LLFA climate change assessment. We also recommend that improved reach is needed to engage communities on Strategic Planning Areas.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10	

Other considerations of the DWMP			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Merseyside Environmental Advisory Service	Through habitat creation or enhancement, for example reedbeds and saltmarsh, these habitats attract higher biodiversity unit values and are advantageous as they establish quickly providing a rapid wastewater treatment solution. By investing in habitat banking United Utilities could then access opportunities for receipt of biodiversity net gain monies as developers seek to offset biodiversity losses offsite.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
 Moors for the Future Partnership	Planning for 25-years is realistic. A long-term strategy is necessary in order to tackle the challenges posed by climate change, urbanisation and an ageing infrastructure. Balanced against this, we recognise that legislative, technological, social/political and other changes become harder to account and plan for, the further forward in time is projected.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
	You have mentioned regulation within the context of water services provision, but regulation also affects the labour market as a whole, with the potential to drive up costs for your contractors to carry out upgrades/maintenance works. Allied to this, global supply chain issues and commodities' prices affect the cost and availability of materials (and therefore components) used for such upgrades. At the time of writing this is an acute issue, but even over the longer-term, a case can be made for anticipating these issues to continue to some degree. The same can be said of energy costs	6.3.5.3-6.3.5.11	Main Document, Table 4
 Peak District National Park Authority	The Peak District National Park Authority's focus is based around our statutory purposes: - 1) To conserve and enhance the landscape, wildlife and cultural heritage of the National Park, and 2) To promote opportunities for the understanding and enjoyment of the Park's special qualities. We also have a statutory duty to seek to foster the economic and social well-being of local communities within the National Park. The Special Qualities of the Peak District National Park are described within the Peak District National Park Management Plan (2018-23) National-Park-Management-Plan-2018-2023-print-version.pdf (peakdistrict.gov.uk). Special Quality 7 is Vital benefits for millions of people that flow beyond the landscape boundary. In this particular instance, that includes the Upper Mersey sub-catchments of the Goyt, Etherow and Bollin. The Peaks District National Park Authority's long term priority would be in relation to the health of these particular catchments. The Authority is a founding member of the Moors for the Future partnership, which	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10

Other considerations of the DWMP

Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	<p>focuses on moorland restoration as a means of recreating suitable habitats for native species. The work is also beneficial in retaining rainfall and reducing erosion with associated benefits for water quality and preventing / reducing the impact of flooding due to severe weather events.</p>		
 <p>Ribble Catchment Conservation Trust Ltd</p>	<p>That the integrated approach by UU goes further than compliance, and further than model predictions to ensure a degree of resilience within the planning process and ensuring that the uncertainty within models and climate change is suitably accounted for. Practically - separating water and foul water to tackle to problems at source, and in so doing using nature base solutions to undo historic ills is crucial. The current baseline is not a fair starting point for protecting the environment.</p>	<p>6.3.5.10</p>	<p>Statement of Response, Section 6.3.5.10</p>
 <p>Sefton Council</p>	<p>25-years to some is a long time but issues on the coast often require long lead in times and monitoring, so coastal management often thinks in time epochs up to 100 years. That longer-term view and horizon scanning is important when managing assets at the coast and the interface this has with inland assets.</p>	<p>6.3.5.3-6.3.5.11</p>	<p>Statement of Response, Section 6.3.5.10</p>
	<p>Clearer focus on source to sea issues. Heavily inland focussed. But there are issues along our coasts with drainage and wastewater with issues and opportunities that our changing coast bring.</p>	<p>6.3.5.10</p>	<p>Statement of Response, Section 6.3.5.10</p>
 <p>Warrington Borough Council</p>	<p>Going forwards, it should be a requirement that drainage infrastructure should be designed to take account of higher return period events due to climate change. UU should design new infrastructure to cope with storms in excess of 1:30 return period. WBC believe that increase of sewer flood risk is more as a result of a combination of climate change and aging / inappropriate infrastructure as oppose to householder / individual behaviours. Appropriate level of investment is required by UU to cope with increasing population / development.</p>	<p>6.3.5.10</p>	<p>Statement of Response, Section 6.3.5.10</p>

Other considerations of the DWMP			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	UU should standardise their processes to avoid inconsistent approach to various issues across their drainage catchment areas. UU approach to reclassification of public sewers will create confusion and stress when reporting flooding and will generate significant anxiety for residents who would be deemed to be riparian owners with additional cost and risk being real concerns. Customers pay for disposal of surface water by UU but this approach will increase flood risk. These are often major assets and form the spine of a public sewer network for an area are passed to riparian owners who are ill equipped to manage / maintain the assets	6.3.5.10	Statement of Response, Section 6.3.5.10
 Customer	Yes but the case for an increase needs to be made well and clearly. We have still not got climate change into the general public's thinking - yet climate resilience is critical to water services and needs investment now.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
 Customer	Agriculture changes could influence you more than you think. changes in payments will intensify activity in the lower reaches of major rivers e.g. the Eden. they may lead to more sheep on the Cumbrian fells to as farmers leave agreements with natural England behind.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
 Customer	25-years is a good start but your work at haweswater with RSPB will be only getting going by 2040.. so catchment change takes a long time and its benefits will be long and far reaching	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
 Customer	Climate resilience - both from a water but also a company perspective. A climate approach may drive you beyond pure legal obligations which are often lagging behind real needs.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
 Customer	Climate and environmental resilience - and adherence to the morality of this not just the legal frameworks.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
 Customer	improve your relationship with tenant farmers and encourage soils management on farm. reduce impact of farm based demand by managing natural watering where possible.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
 Customer	An acceptance that water is fundamental socially, commercially and environmentally for the North West. It should be considered a social asset managed by UU but one which influences us all - pollution flooding and agriculture for e.g. - and get buy in from everyone to assist your cause	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10



Other considerations of the DWMP			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Customer	It still feels a bit silo'd - the companies ambitions on climate for example map very well into water resources (pre and post tap) - if you approach this holistically as a company you should be able to put the environment core through all your work and deliver better across all silos.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
 Advisor to Holker Estates	Plan needs to be more radical so as to deal with historic problems and new ones arising due to climate change	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10
	There is no National Plan for dealing with Private Drainage ie Septic Tanks. Perhaps responsibility for ensuring their competence, adequacy and effectiveness should be passed to Water Cos and an Annual Charge levied. EA seems incompetent to perform this task.	6.3.5.3-6.3.5.11	Statement of Response, Section 6.3.5.10






A.7 DWMP document




A.7.1 Structure, content and accessibility of the plan

Table 19 Our response to draft consultation feedback regarding structure, content and accessibility



Structure, content and accessibility			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Consumer Council for Water	We also note that as well as providing a DWMP geospatial platform (GSP) stakeholders were provided with a training pack and the offer of one to one sessions, to demonstrate how to use GSP. Partners are encouraged to feed back their experience with using GSP. This indicates a willingness to adapt engagement tools to suit the needs of stakeholders.	7.3.1.3-7.3.1.5	Geospatial Portal
	We consider that your dDWMP was generally well structured and technically well developed. It included relevant information for your strategic planning areas, as well as some supporting technical appendices, providing an important background to your Baseline Risk and Vulnerability Assessment (BRAVA) approach.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
 Environment Agency	We would encourage all companies to DWMP as a living document, to enable more solutions to be taken on board over time.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5

Structure, content and accessibility			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Copeland Borough Council	It is a very comprehensive document, with a lot of analysis involved in coming up with the plan. I do think it addresses the main issues at the time of development.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
	The plan itself is very high level. For me it is the at the local TPU level that would be of more interest. - Because it is a very complex document, with a number of technical appendices, it is overwhelming for people to read through a lot of the plan. Consultation responses will therefore be based on what people have been able to go through.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
	It is always difficult to plan for what may change in the future, with legislation being a significant factor driving change. The DWMP should perhaps be a living document and updated.	7.3.1.6	Statement of Response Sections 7.3.1.3-7.3.1.5
 Greater Manchester Combined Authority	The DWMP portal While readily accessible, would benefit from a more granular level of detail to understand the spatial drivers and interventions required at a place-based level. In addition, the move towards wider data sharing and use of open data would provide a further platform for collaborative working.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
 Groundwork Greater Manchester	Lack of detail and integration between flooding and environment. Some of the terminology was a bit unclear	7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
	Gives a good high-level overview	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
 Groundwork Greater Manchester	Quantity of information in the report makes it difficult to fully digest (this is also the case for the whole of the DWMP). We would be interested in further detail around the mitigation measures and how they will be implemented.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
 Lancashire County Council	A separate consideration is that the DWMP documentation is extensive and complicated to understand, particularly for non-technical people. It is likely that community groups would be most interested in the details revealed in the Strategic Planning Area Documents, yet the consultation publicity hasn't particularly drawn these to the notice of consultees.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5



Structure, content and accessibility			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	We are satisfied that the draft DWMP is compatible with the vision and themes of Lancashire's Local Flood Risk Management Strategy. We haven't identified any gaps at this stage, and we welcome UU's recognition that the document is very new and will benefit from review and adaptation during its lifetime at identified milestones. We also welcome regular reporting of progress in delivery of the DWMP in a way that is both accessible to our communities as well as to technical professionals.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
	We very much appreciated seeing the process laid out and explained from baseline situation & risks, through prioritisation, and the geographical differences around the region, through to a composite plan.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
 Ribble Catchment Conservation Trust Ltd	There are suitable graphics and explanation for many elements of particular importance.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
	The section in the main document, made these questions hard to answer, as it was very short and hard to obtain the detail. Conversely the Strategic Environment Report at 550 pages was inaccessible to answer these questions.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
 The Wildlife Trust for Lancashire, Manchester & North Merseyside	Regrettably, I have found this consultation not to be 'user-friendly' in places. It presupposes a high level of familiarity with and depth of knowledge of the water industry, its processes and acronyms, and a breadth and depth of spatial familiarity with all catchments, watercourses and infrastructure across the whole of the northwest of England that it is impossible for any one person to possess if not already deeply steeped in the whole region's drainage and wastewater management industry and its national contexts. It is, I think, therefore less accessible to sub-regional (i.e. county/city region) environmental charities than might otherwise be the case: were there more lead-in time it might have been possible for Cheshire Wildlife Trust, Cumbria Wildlife Trust and The Wildlife for Lancashire, Manchester & North Merseyside to chunk this elephant into more digestible units.	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5
 Water Resources West	We are pleased to see that United Utilities has produced a comprehensive and easy to read DWMP. We are in broad agreement with the principles and approach outlined in the Plan, and support the adaptive	7.3.1.3-7.3.1.5	Statement of Response Sections 7.3.1.3-7.3.1.5

Structure, content and accessibility			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
	approach suggested by the company to address current and future challenges.		

A.7.2 Our approach and response to consultation

Table 20 Our response to draft consultation feedback regarding our approach and response to consultation




Approach and response to consultation			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Consumer Council for Water	The final plan would benefit from evidence to support that action was taken in response to feedback.	7.3.2.1-7.3.2.4	Statement of Response, Sections 7.3.2.1-7.3.2.4
 Ofwat	You should consider the responses (consultation) to your dDWMP consultation and explain how these have influenced your final DWMP.	7.3.2.1-7.3.2.4	Statement of Response, Sections 7.3.2.1-7.3.2.4

A.7.3 Assurance and governance processes

Table 21 Our response to draft consultation feedback regarding assurance and governance


















Assurance and governance			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Ofwat	We note that you have provided a Board assurance statement for your DWMP and acknowledge that you have undertaken additional assurance including an independent external review of your dDWMP submission.	7.3.3.1-7.3.3.3	C002 Board Assurance Statement
	You should ensure that a full Board Assurance statement is also provided as part of your final DWMP submission, and we would welcome confirmation of any additional assurance provided on your final plan.	7.3.3.1-7.3.3.3	C002 Board Assurance Statement


A.8 All other draft consultation feedback

Table 22 Our response to all other draft consultation feedback



Draft consultation feedback			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
 Natural England	Please also note that your use of SPA as acronym for Strategic Planning Area is confusing in relation to conservation designations Special Protected Areas.	8.2.7	Statement of Response, Section 8.2.7
 Warrington Borough Council	UU underlying profit for 21/22 was £610m according to https://www.unitedutilities.com/globalassets/documents/pdf/2021-22-full-year-results-presentation.pdf The £3.5bn investment identified in the DWMP over 25years is the equivalent of just £144million per year which is just £23.6 per cent of the profit for 21/22. UU should increase their investment in replacement or upgrading their infrastructure for the benefit of their customers and operate at reduced profits. This identifies that there is room for increased investment without the need to increase customer’s bills.	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	Investing more money in environment protection and proper sewage treatment over dividends and directors bonuses	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	Yes still allowing too much money to be paid to share holders when essential work is needed	8.2.3-8.2.6	Statement of Response,

Draft consultation feedback			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
			Sections 8.2.3-8.2.8
 Customer	Stop paying dividends and divert that money to maintain the infrastructure	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	No need to increase bills cut big pay cheques and profit	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	All United utilities care about are profits and big pay cheques	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	do the right thing for the environment not your shareholders or share price (I realise this affects director remuneration in form of stock options so its like turkeys voting for Christmas)	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	stop lying and lobbying / donating to governments for regulation changes	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	Moral obligations should override legal obligations	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	To stop the dumping of raw sewage into local rivers and streams eg the ladybrook	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	Stop releasing sewage into the regions rivers as an immediate priority.	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	Dumping sewage should only be done in emergency situations at the moment it is routine	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	You still get off with dumping sewage when it suits you	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8
 Customer	Greater penalty for failing to comply with the rules to the letter	8.2.3-8.2.6	Statement of Response,

Draft consultation feedback			
Consultee	Consultation feedback (direct quote)	Statement of Response	Final DWMP
			Sections 8.2.3-8.2.8
 Advisor to Holker Estates	EA needs to be properly funded as a Regulator to ensure compliance with Regulations or responsibility passed to another body	8.2.3-8.2.6	Statement of Response, Sections 8.2.3-8.2.8

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