

NORTHUMBRIAN WATER DWMP – STATEMENT OF RESPONSE

Comment	Northumbrian Water response	Change in final DWMP
<i>Specific comments made in consultation responses</i>	<i>How we respond to these comments, including whether they are addressed in the final DWMP</i>	<i>Reference to where to find changes in final DWMP</i>
Respondent: CCW		
<p>Customer engagement: In the final plan, we would like to see a clear link between the feedback given by those who participated in the wide range of engagement activities the company undertook and how these views have influenced the plan. Evidence of who the company has tried to engage with, even if this was unsuccessful, would also demonstrate the company’s commitment to engage with a wide range of stakeholders and customers.</p>	<p>Addressed in plan.</p> <p>In Section 10.1, on page 45 of our DWMP Technical Summary we explain the types of engagement we have undertaken with a range of stakeholders and customers. This engagement and research have been used to help develop our options and constraining criteria and the plan we put forward for tackling storm overflows in our DWMP is based on the “preferred plan” coming from that customer engagement, incorporating customer views on affordability and their expectations on delivery and green solutions – while still meeting the Government’s SODRP.</p> <p>In Section 19, on page 98 of our DWMP Technical Summary we have included a list of all of the stakeholders we have engaged with for our DWMP.</p> <p>Our Strategic Planning Group’s Terms of Reference, list of representatives, meeting records and presentation can be found in the Technical Report area of the DWMP website www.nwl.co.uk/dwmp</p> <p>We can confirm that we have acted within the spirit and guidance of the DWMP framework.</p> <p>The Strategic Planning Group has carried out the duties under Section 3 of the DWMP framework, including:</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 45, Section 10.1</p> <p>Page 98, Section 19</p>

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	<ul style="list-style-type: none"> • Enabled third party participation in the development of the DWMP • Provided a focal point where potential risks are exposed and shared • Facilitated external stakeholder engagement and promoted partnership working • Provided challenge and oversight when appropriate <p>We have discussed an ongoing role for the Strategic Planning Group in monitoring delivery of the DWMP and future updates.</p>	
<p>Customer summary: Additional information to explain the issue of internal sewer flooding. At present Storm Overflows is the only subject covered in any detail and this doesn't seem balanced</p>	<p>Addressed in plan.</p> <p>We have added sections in the customer summary that explain sewer flooding and wastewater treatment. Our customer summary includes explanations of our sewer network, including the impact of sewer flooding, and wastewater treatment.</p> <p>On page 19, in the Sewer networks section of our DWMP Technical Summary we have included information explaining the issue of sewer flooding and how we work to reduce the risk of this occurring.</p>	<p><u>DWMP Customer Summary</u></p> <p>Page 9</p> <p><u>DWMP Technical Summary</u></p> <p>Page 19, Sewer Networks</p>
<p>Customer summary: Summarise the present position regarding the number of properties at risk of sewage flooding, the number of storm overflow spills and wastewater treatment works at risk of not operating effectively. This will provide context and a baseline and help people understand the scale of the challenge.</p>	<p>Addressed in plan.</p> <p>Data showing the position in 2025 and forecast improvement as the DWMP is implemented have been included in the customer summary.</p> <p>In part C of our DWMP Technical Summary from page 72 onwards, we present the risk associated with our planning objectives.</p>	<p><u>DWMP Customer Summary</u></p> <p>Page 10</p> <p><u>DWMP Technical Summary</u></p>

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	<p>The DWMP Datatables show our risk numbers for all of the planning objectives. www.nwl.co.uk/dwmp</p> <p>Risk numbers for each L3 are also presented on individual Drainage Area (L3) Plan drawings. www.nwl.co.uk/dwmp</p> <p>Finally, our 7 Area (L2) summary reports show all planning objective risk for each L2 and how these change over the planning horizons. This includes the impact of differing climate change scenarios for how this effects flood risk. www.nwl.co.uk/dwmp</p>	Page 72
<p>Customer summary: Prior to the four options given, it needs to be explained more clearly that bills are increased by inflation every year. It should also be mentioned that there are many other competing priorities that will affect customer bills, not just drainage and wastewater, and to outline what these are likely to be.</p>	<p>Addressed in plan.</p> <p>Because of the huge investments that we need to make, we will need to borrow more money, our shareholders will have to put in more money and customers will have to pay more money in bills.</p> <p>Bills will start to increase from 2025. By 2060 we expect our DWMP would mean customers' annual wastewater bills will increase by £166 from the current bill of £187. However, changes in annual bills are also affected by other factors – including inflation and how well we deliver our services. We will consult further on the impact on bills across our water and wastewater services in the next few months as we finalise our Long-Term Delivery Strategy and Regulatory Business Plan for 2025-30.</p>	<p><u>DWMP Customer Summary</u></p> <p>Page 10</p>
<p>Customer summary: We would like to see the company develop this document further</p>	<p>Addressed in plan.</p> <p>As above.</p>	<p><u>DWMP Customer Summary</u></p>

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for the final plan, notably to include further detail on likely bill impacts.		Page 10 <u>DWMP Technical Summary</u> Page 95, Section 16.2
Customer summary: There is further potential to use videos and clips to make the plan easier to access and understand.	Addressed in plan. Animation demonstrating how our network operates, including storm overflows, included in customer summary.	<u>DWMP Customer Summary</u> Page 4
Collaboration: We note that through the wider engagement processes the company has identified more than “700 opportunities which were then categorised as ‘Impact’, ‘Inform’ or ‘Record’, depending on how they matched our identified risks”. In the final plan we would like to see the further details about the potential opportunities to collaborate with others that these schemes present.	Addressed in plan. Stakeholder engagement is described in Section 10.1 on page 45 of our DWMP Technical Summary. Our individual Drainage Area (L3) Plan drawings also identify areas for opportunity and how these overlap with the options we have developed. www.nwl.co.uk/dwmp Within the DWMP Datatables, we have included details of the partnership opportunities we have included in our final DWMP. www.nwl.co.uk/dwmp We have included an example of how Stakeholder opportunities have helped us develop our plan on page 78 of Part C of our DWMP Technical Summary. Further detail of stakeholder opportunities that have influenced our final plans are listed in our 7 Area (L2) summary reports. www.nwl.co.uk/dwmp	<u>DWMP Technical Summary</u> Page 45, Section 10.1. Page 78, Collaborative Opportunities in the SODRP
C&NBS: Nature based and catchment wide solutions can represent the best value long-	Addressed in plan.	<u>DWMP Technical Summary</u>

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<p>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.</p>	<p>Nature based and catchment wide solutions have been promoted and prioritised wherever feasible within our DWMP and we have made it clear within our Part C of our DWMP Technical Summary.</p> <p>Our individual Drainage Area (L3) Plan drawings the type of solution that has been promoted www.nwl.co.uk/dwmp</p> <p>The mix of grey and green solutions in the plan to address PO4 & PO5 is demonstrated through charts shown on page 74 & 75 of our DWMP Technical Summary.</p> <p>Our option appraisal is described in Section 13.3 on page 69 of our DWMP Technical Summary.</p>	<p>Page 72 Part C: Our DWMP</p>
<p>Research: Storm Overflows and sewer flooding are some of the most visible service failures. However, the company needs to draw on the findings of customer research to establish customers' priorities as they develop their plan.</p>	<p>Addressed in plan.</p> <p>We discuss how we have engaged with stakeholders and customers in Section 10 of our DWMP Technical Summary. This includes information on how customers feedback has shaped our DWMP.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 45, Section 10</p>
<p>Costs: 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 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.</p>	<p>Not addressed in plan.</p> <p>Measures to support customers on affordability will be addressed in our PR24 Acceptability and Affordability research rather than through the DWMP.</p>	<p>N/A</p>

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Respondent: Environment Agency		
<p>Planning objectives: We are concerned that only four of the six national planning objectives recommended in Water UK's framework have been adopted. Sewer collapses risk and Risk of WwTW quality compliance failure are absent from the plan. This needs to be rectified in the final plan.</p>	<p>Addressed in plan. All the common planning objectives have been restated as part of our DWMP data table submission www.nwl.co.uk/dwmp. This now includes information on sewer collapses and risk of wastewater treatment works compliance which were missing from our draft plan.</p> <p>We also discuss these and other planning objective/performance commitments in Section 11.4 on page 60 of our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u> Page 60, Section 11.4</p>
<p>Engagement: Although Northumbrian Water engaged well strategically, the engagement was less good at catchment level. While NWL has shown a willingness to engage and work in partnership with local authorities and stakeholders from both water quality and flood risk perspectives, too much of this engagement has utilised slots at existing meetings, providing updates but insufficient time for proper engagement. The process would have been strengthened by adopting more of an Engage, Deliberate, Decide (EDD) form of engagement.</p>	<p>Addressed in plan.</p> <p>Stakeholder engagement is discussed in Section 10.0 of our DWMP Technical Summary. The DWMP framework directs us to use existing networks to gain the most out of engagement, which is the approach we have taken. In addition to this we engaged stakeholders through specific sessions to review future opportunities, both on a bilateral basis and in group sessions.</p> <p>We regularly kept key stakeholders informed and involved in our DWMP through our Strategic Planning Group. During the development process we also produced quarterly newsletters providing an informal update on our progress.</p> <p>We addressed this comment with our Strategic Planning Group since publication of our draft, and as a result held further agreed sessions with Stakeholders in March 2023.</p>	<p><u>DWMP Technical Summary</u> Page 45, Section 10</p>
<p>Risk: We are disappointed that NWL has deviated from the Water UK guidance by not using BRAVA risk thresholds, replacing such an approach with an evidence-based approach to risk assessment based on whole-life benefits and the Outcome</p>	<p>Addressed in plan.</p> <p>Our final DWMP presents risk as both absolute numbers (e.g) properties at risk) and also as per the Water UK guidance on scoring.</p>	<p><u>DWMP Technical Summary</u> Page 72, Part C: Our DWMP.</p>

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<p>Delivery Incentives under Ofwat's framework. We need to be convinced that minimising ODI penalty payments will drive socially optimal outcomes.</p>	<p>The scoring is presented in each of our 7 Area (L2) summary reports. www.nwl.co.uk/dwmp</p> <p>Absolute numbers are presented in Part C of our DWMP Technical Summary.</p> <p>Risk is also shown on our individual Drainage Area (L3) Plan drawings www.nwl.co.uk/dwmp</p>	
<p>Water quality planning: One significant DWMP issue which needs addressing is Water Quality planning and growth. Specifically, improvements in the plan are required related to sewage treatment works and population growth – an increasing population requires upgrades to be planned in at sewage works to meet existing and ever tightening permit requirements. NWL has not followed the guidance published by Water UK associated with water quality assessments for growth and wastewater planning. NWL has since recognised this issue, and we would expect to see it addressed in this plan.</p>	<p>Addressed in plan</p> <p>Our Plans to meet our requirements at WWTW and population growth are described in Section 15 of our DWMP Technical Summary. This includes Improvement for No deterioration and investigations obligations up to 2060 on:</p> <ul style="list-style-type: none"> • Habitats directive • Water framework Directive • Environment Act Phosphorus reduction • Urban Wastewater Treatment Directive • Dry Weather Flow compliance 	<p><u>DWMP Technical Summary</u></p> <p>Page 80, Section 15</p>
<p>Risk: We could not see an evaluation of wider resilience of NWL's wastewater infrastructure, specifically to fluvial and coastal flooding, across all catchments, which would also need to consider the impact of climate change and urban creep. In the plan we would expect to see water</p>	<p>Addressed in plan.</p> <p>We will be including a business case for enhanced funding in our PR24 business plan to support the work we would like to do improving the future resilience of our assets from the increased likelihood from a number of hazards, including from storms such as Storm Arwen and Storm Malik.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 57, Section 11.3 and page 97 Section 16</p>

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<p>companies assess the risk to their assets (pumping stations, wastewater treatment works), from a full range of potential threats and hazards including storms such as Storm Arwen in November 2021 and Storm Malik in January 2022.</p>	<p>We have included a section on resilience in Section 11.3 (Impact of Climate Change on Wastewater Treatment Works and Sewage Pumping Stations) on page 57 of DWMP Technical Summary and in Section 16 page 93 of our DWMP Technical Summary.</p> <p>Further information, including a detailed business case will be presented with our PR24 plan.</p>	
<p>Risk: The plan is not an assessment of all drainage and wastewater risks, with consideration of integrated solutions to manage multiple risks. For example £186m is needed to maintain performance at the company's 26 no. WWTWs. This reads as an 'add-on' rather than being an integral part of the plan.</p>	<p>Addressed in plan.</p> <p>Our final plan is described in Part C: Our DWMP on page 72.</p> <p>Our plan includes a wide range of proposals and options, with integrated solutions, catchment-based opportunities and partnership schemes with multiple drivers. Our approach to option development and appraisal is discussed on page 69 of our DWMP Technical Summary.</p> <p>We also discuss our approach to catchment based and nature based solutions within our plans to meet our requirements at WWTW and population growth in Section 15 of our DWMP Technical Summary.</p> <p>Our DWMP Datatables also include information on key partnership schemes. www.nwl.co.uk/dwmp</p> <p>Section 16.2 in our DWMP Technical Report provides a summary of the programmes included in our DWMP.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 72, Part C: Our DWMP</p> <p>Page 69, Section 13.3</p> <p>Page 80, Section 15.0</p> <p>Page 94, Section 16.2.</p>
<p>Risk: There seems to be an inconsistent assessment of environmental risks in the</p>	<p>Addressed in plan.</p>	<p><u>DWMP Technical Summary</u></p>

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<p>Teesside Strategic Planning Unit (SPU). For certain drainage communities that look to be affecting the SSSI, Northumbrian Water has assessed them as not affecting the SSSI. We found NWL's assessment methodology to be not very transparent.</p>	<p>This approach has been updated in line with WINEP guidance, which was released after publication of our draft DWMP.</p> <p>Our approach to assessing environmental and other risks is described in Part C: Our DWMP on page 72 of our DWMP Technical Summary.</p> <p>Further details at an L2 level can be found in our 7 Area (L2) summary reports and at a L3 level can be found in our Drainage Area (L3) Plan drawings. www.nwl.co.uk/dwmp</p>	<p>Page 72, Part C: Our DWMP</p>
<p>Scenarios: At present the plan is represented by four scenarios without any preference stated, as such is not yet a plan. We presume, further to a specific consultation question seeking scenario preferences, that NWL will name its preferred scenario in the final plan.</p>	<p>Addressed in plan.</p> <p>Our final DWMP we have an overall preferred plan which is:</p> <ul style="list-style-type: none"> • Best value + marginal green storm overflows • Best value sewer flooding + NIDP • Best value/least cost WINEP. <p>In our plan we also present alternative costs for storm overflows which are:</p> <ul style="list-style-type: none"> • Least cost storm overflow • Best value storm overflow. <p>These are detailed in Part C: Our DWMP in our DWMP Technical Summary.</p> <p>We also include three adaptive plan scenarios from our preferred plan on page 76 and page 90.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 72, Part C: Our DWMP</p> <p>Page 76 and page 90</p>
<p>Scenarios: Of the four planning scenarios presented Option 1 does not encourage partnership working or collaborative delivery</p>	<p>Addressed in plan.</p> <p>As above.</p>	<p><u>DWMP Technical Summary</u></p>

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<p>of flood risk management between the water company and other RMAs and this could end the potential for collaborative flood schemes. It is limited in promoting adaptive planning approaches and it misses opportunities to achieve wider benefits. We cannot support option 1 as a viable approach as it is not consistent with wider policy and guidance, misses key opportunities and undermines the collaborative management of flood risk in Northeast England.</p>		<p>Page 72, Part C: Our DWMP</p> <p>Page 76 and page 90</p>
<p>Monitoring: Regarding monitoring of overflows, it was unclear how Northumbrian Water would use continuous water quality and near-real time reporting to inform adaptive pathways.</p>	<p>Addressed in plan.</p> <p>We have included our plans for water quality monitoring on page 83 of DWMP Technical Summary (Environment Act Continuous River Water Monitoring).</p> <p>We estimate more than 2000 monitors will need to be deployed across the region's water bodies including inland, estuarine and coastal locations.</p> <p>Increased monitoring and investigations (of any type) could mean that our plans inevitably evolve over-time and we will continue to reassess future investment needs and assess innovations and efficiencies that might emerge that can help manage our costs. How we plan to do this is included within our Long-Term Delivery Strategy, which will be published in June 2023.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 89, Section 15.</p>
<p>Climate change: We found the plan to be deficient in its treatment of climate change. In the Technical Report we found several references to climate change but it was</p>	<p>Addressed in plan.</p> <p>We have included a section on Climate change on page 55 of our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 55, Section 11.3</p>

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<p>lacking a section in its own right explaining how it has been accounted for in the plan. The impact of climate change on rainfall was assessed, but there were no references to net zero, no consideration of climate change impacts associated with the solutions, and no consideration of the climate change impacts on wastewater treatment.</p>	<p>Following the publication of UKCIP18 in November 2021, we have created new rainfall models for our final DWMP to ensure that our results are up to date.</p> <p>We have also utilised the latest version of REDUP (version 3) which uplifts Time Series Rainfall for climate change scenarios. We believe we are one of only a couple of companies who has done this for their final DWMP.</p> <p>For our final DWMP, we have included low, central and high climate change estimates. Our adaptive planning scenario shows how we might increase the role of surface water separation and sustainable drainage solutions to target delivering a reduction of internal and external sewer flooding alongside storm overflow discharge reductions for the RCP2.6 scenario. This is adapted from our preferred plan which considers RCP8.5.</p> <p>Our 7 L2 Area (L2) summary reports also show the impact of climate change scenarios on planning objective risk. www.nwl.co.uk/dwmp</p>	
<p>Groundwater: We found no references to groundwater in the DWMP. We would like to see Northumbrian Water include the impacts of their wastewater management on groundwater (e.g. leaking sewers) to eliminate polluting impacts on groundwater resources, habitats and the wider environment.</p>	<p>Addressed in plan.</p> <p>We have included information on how we effectively manage our interaction with groundwater on Page 22 of our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 22, Section 5.0</p>
<p>SEA: The Environmental Report includes a SEA assessment of only one of the four planning scenarios and it wasn't clear to us</p>	<p>Addressed in plan.</p>	<p><u>DWMP Technical Summary</u></p>

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<p>how the SEA had helped to inform the development of the plan.</p>	<p>We have completed a SEA on the Least Cost, Best Value and Best Value Marginal Green Options. www.nwl.co.uk/dwmp</p> <p>Our SEA has driven the development of our plan. It has identified that the Best Value Marginal Green preferred plan for Storm Overflows provides additional environmental benefits and moves the plan to an overall positive position.</p>	<p>Page 95, Section 17.0</p>
<p>Respondent: Ofwat</p>		
<p>Planning objectives: We could not find reference to sewer collapses, one of the common planning objectives, or why this has been omitted from your plan. In your final DWMP you should incorporate this objective or clearly explain why it was not considered</p>	<p>Addressed in plan.</p> <p>Sewer collapses has now been included in our final DWMP.</p> <p>Page 21 and page 86 of our DWMP Technical Summary include information relating to our current activities and what we plan to do in the future to help reduce risk.</p> <p>Our risk profile is presented in our DWMP Databales. www.nwl.co.uk/dwmp</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 21 and page 86</p>
<p>Adaptive planning: There is insufficient detail on the use of trigger points, the scenarios you have used, or how options are being developed to support an adaptive approach. In your final plan you should provide clarity on how adaptive planning is being applied in your DWMP, and how it integrates with your PR24 long-term delivery strategy.</p>	<p>Addressed in plan.</p> <p>A description of how we are applying an adaptive planning approach and the relationship with our long-term delivery strategy is in Section 6.2 of our DWMP Technical Summary.</p> <p>We also include three adaptive plan scenarios from our preferred plan on page 76 and page 90 of our DWMP Technical Summary.</p> <p>Our adaptive plans are also presented in our DWMP Databales. www.nwl.co.uk/dwmp</p> <p>Further information relating to adaptive planning will be included in our Long-Term Delivery Strategy due to be published in June 2023.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 33, Section 6.2.</p> <p>Page 76, page 90</p>

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<p>Asset maintenance: It is not clear that you have considered the role that asset maintenance must play in improving services, building asset resilience, and reducing risks over the next 25 years. We expect asset performance, condition, and operation to be considered in the decision-making process prior to enhancement interventions. You should clearly set out how asset management and optimisation (base expenditure activities) can address some 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.</p>	<p>Addressed in plan</p> <p>The relevance of asset health data to ensuring compliance at WwTWs is referenced in Part A of our DWMP Technical Summary in Section 5.0</p> <p>The benefits of a smart network for asset maintenance are also referenced in this section.</p> <p>The scope for improvement from base expenditure and the current limitations on asset maintenance and replacement are discussed in Part A our DWMP Technical Summary in Section 6.0 under the Future challenges section.</p> <p>This section describes many of the challenges we already face and sets out how there is already a gap between the allowances we get for base maintenance and the economic replacement rate of our assets</p> <p>The relationship between climate change and asset health is discussed in the BRAVA section of our DWMP Technical Summary in Section 11.3, and our plan to address this is set out in Part C of our DWMP Technical Summary.</p> <p>Delivering an evidence-based assessment of asset health is explained as a benefit of our investment to reduce sewer collapses in Section 15.8 on page 86. .</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 16, Section 5.0</p> <p>Page 32, Section 6.0</p> <p>Page 72, Part C: Our DWMP.</p> <p>Page 86, Section 15.8</p>
<p>Scenarios: We consider that there is insufficient convincing evidence in your dDWMP on why alternative options were discounted. We note that you have</p>	<p>Addressed in plan</p> <p>A section explaining our options development approach in detail is included in Section 12.0 of Our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 65, Section 12.0</p>

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<p>attempted to quantify the benefits associated with your four plan options, and these should be refined, accordingly, in your final DWMP.</p>	<p>We have also included our Option Development Register on our website which shows all of the options we have considered. www.nwl.co.uk/dwmp</p>	
<p>C&NBS: We could not find clear evidence of what green solutions have been selected in the plan options or to what extent green solutions make up the plan options presented.</p>	<p>Addressed in plan.</p> <p>Nature based and catchment wide solutions have been promoted and prioritised wherever feasible within our DWMP and we have made it clear within our Part C of our DWMP Technical Summary.</p> <p>Our individual Drainage Area (L3) Plan drawings the type of solution that has been promoted www.nwl.co.uk/dwmp</p> <p>The mix of grey and green solutions in the plan to address PO4 & PO5 is demonstrated through charts shown on page 74 & 75 of our DWMP Technical Summary.</p> <p>Our option appraisal is described in Section 13.3 on page 69 of our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 72 Part C: Our DWMP</p>
<p>Collaboration: It is unclear how likely collaboration opportunities are to 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.</p>	<p>Addressed in plan</p> <p>Stakeholder engagement is described in Section 10.1 on page 45 of our DWMP Technical Summary.</p> <p>Our individual Drainage Area (L3) Plan drawings also identify areas for opportunity and how these overlap with the options we have developed. www.nwl.co.uk/dwmp</p> <p>Within the DWMP Datatables, we have included details of the partnership opportunities we have included in our final DWMP. www.nwl.co.uk/dwmp</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 45, Section 10.1.</p> <p>Page 78, Collaborative Opportunities in the SODRP</p>

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	<p>We have included an example of how Stakeholder opportunities have helped us develop our plan on page 78 of Part C of our DWMP Technical Summary.</p> <p>Further detail of stakeholder opportunities that have influenced our final plans are listed in our 7 Area (L2) summary reports. www.nwl.co.uk/dwmp</p>	
<p>SODRP: You have not provided evidence relating to all of the storm overflow targets, and you have not provided scheme-specific solutions, therefore we are unclear exactly how you intend to meet these targets or what impact these will have on costs in your plan. 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>Addressed in plan.</p> <p>Page 36 of our DWMP Technical Summary fully describes our plan to meet the wider objectives outlined in the SODRP. Our plan to meet the SODRP is described in Section 14.0 of our DWMP Technical Summary.</p> <p>This includes detailed cost and delivery milestones against the targets. This information is also included in the DWMP data tables.</p> <p>Further detailed information is included in both our Area (L2) summary reports and on our Drainage Area (L3) Plan drawings. www.nwl.co.uk/dwmp</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 36</p> <p>Page 74, Section 14.0</p>
<p>C&NBS: We are unclear how your optioneering and decision-making support this ambition as scheme specific details have not yet been provided. You should provide clarity on this in your final DWMP, along with the rationale as to why green options have been discounted.</p>	<p>Addressed in plan.</p> <p>Nature based and catchment wide solutions have been promoted and prioritised wherever feasible within our DWMP and we have made it clear within our Part C of our DWMP Technical Summary.</p> <p>Our individual Drainage Area (L3) Plan drawings the type of solution that has been promoted www.nwl.co.uk/dwmp</p> <p>The mix of grey and green solutions in the plan to address PO4 & PO5 is demonstrated through charts shown on page 74 & 75 of our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 72 Part C: Our DWMP</p>

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	<p>Our option appraisal is described in Section 13.3 on page 69 of our DWMP Technical Summary.</p> <p>We have also included our Option Development Register on our website which shows all of the options we have considered. www.nwl.co.uk/dwmp</p>	
<p>Storm overflows: We did not find information in your plan explaining the root causes of storm overflow spills to give stakeholders an understanding of the extent of the problem, and you have also been unable to incorporate requirements for screening overflows or water quality monitoring at storm overflows in your plan. You should aim to include details on these in your final plan.</p>	<p>Addressed in plan</p> <p>We discuss the decision support tools, systems and process we have in place to help us understand root causes in Section 5.0 of our DWMP Technical Summary.</p> <p>This includes:</p> <ul style="list-style-type: none"> • How we manage groundwater • Monitoring • Smart networks, and • Driving improvement <p>We have set out in detail the requirements for screening at 849 SOs on page 75 of our DWMP Technical Summary.</p> <p>Our DWMP L1 report lists all of the 1561 overflows in the region and highlights whether work is required, and if it is, the date it will be undertaken. This can be found at www.nwl.co.uk/DWMP.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 16, Section 5.0</p> <p>Page 75, Screens</p> <p>Page 82, Section 15.3</p>

Comment	Northumbrian Water response	Change in final DWMP
	<p>We have included our plans for water quality monitoring on page 82 (Environment Act Continuous River Water Monitoring) of our DWMP Technical Summary.</p> <p>We estimate more than 2000 monitors will need to be deployed across the region's water bodies including inland, estuarine and coastal locations.</p>	
<p>Costs: We note that you have provided information on the potential 2045 bill impacts of the four options in your plan. You state that you do not have sufficient evidence yet that customers would support this level of bill increase. You should consider your consultation responses, and any other engagement on this, and how this has influenced your DWMP in your final plan.</p>	<p>Not addressed in plan.</p> <p>This forms part of the development of our PR24 business plan.</p>	N/A
<p>Costs: Your final plan should consider improvements that are available through better use of base funding such as asset management optimisation before consideration of enhancement investment requirements.</p>	<p>Addressed in plan</p> <p>The scope for improvement from base expenditure and the current limitations on asset maintenance and replacement are discussed in Part A our DWMP Technical Summary in Section 6.0 under the Future challenges section.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 32, Section 6.0</p>
<p>C&NBS: We note your intention to include 'projects to drive better, more efficient, and nature-based solutions to tackling drainage and storm overflows in the future' as part of your PR24 business plan. You should provide evidence for such projects within</p>	<p>Addressed in plan.</p> <p>Nature based and catchment wide solutions have been promoted and prioritised wherever feasible within our DWMP and we have made it clear within our Part C of our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 72 Part C: Our DWMP</p>

Comment	Northumbrian Water response	Change in final DWMP
<p>your final DWMP, demonstrating the need and decision-making behind these options in the context of a long-term best value plan.</p>	<p>Our individual Drainage Area (L3) Plan drawings the type of solution that has been promoted www.nwl.co.uk/dwmp</p> <p>The mix of grey and green solutions in the plan to address PO4 & PO5 is demonstrated through charts shown on page 74 & 75 of our DWMP Technical Summary.</p> <p>Our option appraisal is described in Section 13.3 on page 69 of our DWMP Technical Summary.</p> <p>We have also included our Option Development Register on our website which shows all of the options we have considered. www.nwl.co.uk/dwmp</p>	
<p>Costs: You should provide detailed evidence on the costs of your preferred plan in your final DWMP, particularly where your plan may have changed in light of your consultation feedback.</p>	<p>Addressed in plan</p> <p>We discuss how we have identified costs and benefits in Section 13 of our DWMP Technical Summary. This includes information on how we have benchmarked our costs to ensure they are efficient and robust.</p> <p>The cost of our final preferred DWMP is described in Section 17.</p> <p>The impact on customers bill as a result of our preferred plan is also described in Section 17.0</p> <p>The final Storm Overflow Reduction Plan, WINEP Guidance on Storm Overflow priorities, together with the requirements to include more aspects of our business plan within our DWMP have increased the cost of our final DWMP compared to the costs we presented in our Draft DWMP in June 2022.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 67, Section 13.</p> <p>Page 94, Section 17.</p>

Comment	Northumbrian Water response	Change in final DWMP
<p>Engagement: You should provide further detail on your customers' responses to the proposed bill increases in your preferred plan. You should consider the responses to your dDWMP consultation, and any additional engagement, and explain how these have influenced your final DWMP.</p>	<p>Addressed in plan.</p> <p>In Section 10.1, on page 45 of our DWMP Technical Summary we explain the types of engagement we have undertaken with a range of stakeholders and customers. This engagement and research have been used to help develop our options and constraining criteria and the plan we put forward for tackling storm overflows in our DWMP is based on the "preferred plan" coming from that customer engagement, incorporating customer views on affordability and their expectations on delivery and green solutions – while still meeting the Government's SODRP.</p> <p>In Section 19, on page 98 of our DWMP Technical Summary we have included a list of all of the stakeholders we have engaged with for our DWMP.</p> <p>Our Strategic Planning Group's Terms of Reference, list of representatives, meeting records and presentation can be found in the Technical Report area of the DWMP website www.nwl.co.uk/dwmp</p> <p>We can confirm that we have acted within the spirit and guidance of the DWMP framework.</p> <p>The Strategic Planning Group has carried out the duties under Section 3 of the DWMP framework, including:</p> <ul style="list-style-type: none"> • Enabled third party participation in the development of the DWMP • Provided a focal point where potential risks are exposed and shared • Facilitated external stakeholder engagement and promoted partnership working 	<p><u>DWMP Technical Summary</u></p> <p>Page 45, Section 10.1</p> <p>Page 98, Section 19</p>

Comment	Northumbrian Water response	Change in final DWMP
	<ul style="list-style-type: none"> • Provided challenge and oversight when appropriate <p>We have discussed an ongoing role for the Strategic Planning Group in monitoring delivery of the DWMP and future updates.</p>	
<p>Assurance: You should ensure that a full Board Assurance statement is provided as part of your final DWMP submission, and we would welcome confirmation of any additional assurance provided on your final plan.</p>	<p>Addressed in plan.</p> <p>Our board assurance statement is provided on Page 9 of our DWMP Technical Summary. This confirms that: The Board is satisfied that:</p> <ul style="list-style-type: none"> • The guiding principles and the DWMP technical framework are being followed and applied. • The planning objectives are being met (both common and bespoke). • There are clear links and processes in place to ensure the appropriate DWMP interventions, including partnership and co-funded schemes, will be put forward for investment in PR24 business plans. • Measures are in place to achieve objectives set in the Government's Storm Overflows Discharge Reduction Plan; and • Many elements of our plan include new statutory obligations which we must deliver. Within these constraints our DWMP is a best value plan for customers and the environment for managing and developing drainage and wastewater services and is based on robust evidence and costing processes. 	<p><u>DWMP Technical Summary</u></p> <p>Page 9, Section 3.0</p>
<p>Respondent: Gateshead Council</p>		

Comment	Northumbrian Water response	Change in final DWMP
<p>Collaboration: Further consideration should also be given to integration with the preparation of Local Nature Recovery Strategies & Networks, Surface Water Management Plans and Green Infrastructure Delivery Plans, particularly linked with the alignment of blue-green corridors.</p>	<p>Addressed in plan. We set out how we have integrated our DWMP to other plans in Section 10.2 of our DWMP Technical Summary. However, this does not cover individual local authority plans due to the resource constraints of from stakeholders and lack of availability of some of these strategies at the time of publication.</p> <p>This could be further picked up in the next cycle of DWMP production.</p> <p>Stakeholder engagement is described in Section 10.1 on page 45 of our DWMP Technical Summary.</p> <p>Our individual Drainage Area (L3) Plan drawings also identify areas for opportunity and how these overlap with the options we have developed. www.nwl.co.uk/dwmp</p> <p>Within the DWMP Datatables, we have included details of the partnership opportunities we have included in our final DWMP. www.nwl.co.uk/dwmp</p> <p>We have included an example of how Stakeholder opportunities have helped us develop our plan on page 78 of Part C of our DWMP Technical Summary.</p> <p>Further detail of stakeholder opportunities that have influenced our final plans are listed in our 7 Area (L2) summary reports. www.nwl.co.uk/dwmp</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 49, Section 10.2.</p> <p>Page 45, Section 10.1.</p> <p>Page 78, Collaborative Opportunities in the SODRP</p>
<p>Respondent: Northumberland County Council</p>		
<p>Collaboration: We would encourage Northumbrian Water to continue to identify opportunities to source additional funding and contributions from other sources. In particular, the beneficiaries and promoters</p>	<p>Addressed in plan.</p> <p>We set out our commitment to partnership approaches, including the Northumbria Integrated Drainage Partnership, North East</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 28 Section 5.1.</p> <p>Page 49, Section 10.2.</p>

Comment	Northumbrian Water response	Change in final DWMP
<p>of the wider benefits in reducing flood risk, improving ecology and providing social value. Opportunities should be taken to tie the DWMP programme in with other development schemes in the area and to maximise nature-based solutions.</p>	<p>Catchments Hub and Bluespaces, in Section 5.1 of our DWMP Technical Summary</p> <p>Stakeholder engagement is described in Section 10.1 on page 45 of our DWMP Technical Summary.</p> <p>Our individual Drainage Area (L3) Plan drawings also identify areas for opportunity and how these overlap with the options we have developed. www.nwl.co.uk/dwmp</p> <p>Within the DWMP Datatables, we have included details of the partnership opportunities we have included in our final DWMP. www.nwl.co.uk/dwmp</p> <p>We have included an example of how Stakeholder opportunities have helped us develop our plan on page 78 of Part C of our DWMP Technical Summary.</p> <p>Further detail of stakeholder opportunities that have influenced our final plans are listed in our 7 Area (L2) summary reports. www.nwl.co.uk/dwmp</p>	<p>Page 45, Section 10.1.</p> <p>Page 78, Collaborative Opportunities in the SODRP</p>
<p>Respondent: South Tyneside Council</p>		
<p>Storm overflows: It would be appreciated if Northumbrian Water could consider some disconnections as part of their detailed plans. For example, there are drainage communities where a number of CSO's exist on a short stretch of watercourse, such as East Boldon (DC 19) and near Brockery Whins (DC5). It is felt that it is not in the spirit of the Combined Sewer Overflow Reduction Plan to allow nine combined sewer overflows to spill ninety times when</p>	<p>Addressed in plan.</p> <p>We are considering options that include source control, surface water separation and surface water removal, and that will meet the targets of the SODRP. We have been carrying out further engagement in advance of publication of the final plan to identify the detail of specific schemes.</p> <p>Our approach to option development and appraisal is included in Section 12 of our DWMP Technical Summary. This includes options</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 65, Section 12.</p>

Comment	Northumbrian Water response	Change in final DWMP
they are so close to each other and it is suggested that this should be considered as a single CSO location.	considering rationalising Storm overflows. We have promoted the best catchment solution wherever possible and feasible.	
<p>Costs: There is concern that whole life costs have not been considered in costing the options which may skew the costs presented currently to the customer. It is not clear what risk allowances have been included in cost estimates and whether these are on a worst-case scenario basis for residents and businesses. In addition, can you confirm whether the efficiencies from partnership working have been included in these costs.</p>	<p>Addressed in plan. Stakeholder engagement is described in Section 10.1 on page 45 of our DWMP Technical Summary.</p> <p>Our individual Drainage Area (L3) Plan drawings also identify areas for opportunity and how these overlap with the options we have developed. www.nwl.co.uk/dwmp</p> <p>Within the DWMP Datatables, we have included details of the partnership opportunities we have included in our final DWMP. www.nwl.co.uk/dwmp</p> <p>We have included an example of how Stakeholder opportunities have helped us develop our plan on page 78 of Part C of our DWMP Technical Summary.</p> <p>Further detail of stakeholder opportunities that have influenced our final plans are listed in our 7 Area (L2) summary reports. www.nwl.co.uk/dwmp</p> <p>The costs we have included in our final DWMP are whole life costs.</p> <p>We discuss how we have identified costs and benefits in Section 13. This includes information on how we have benchmarked our costs to ensure they are efficient and robust.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 45, Section 10.1.</p> <p>Page 78, Collaborative Opportunities in the SODRP</p> <p>Page 67, Section 13.</p>
Respondent: Durham County Council (via survey)		
Climate change: Brava data has been utilised to determine priorities, we welcome that the data will be reanalysed due to	Addressed in plan.	<u>DWMP Technical Summary</u>

Comment	Northumbrian Water response	Change in final DWMP
<p>recent changes in legislation and CC scenarios.</p>	<p>We have included a section on Climate change on page 55 of our DWMP Technical Summary.</p> <p>Following the publication of UKCIP18 in November 2021, we have created new rainfall models for our final DWMP to ensure that our results are up to date.</p> <p>We have also utilised the latest version of REDUP (version 3) which uplifts Time Series Rainfall for climate change scenarios. We believe we are one of only a couple of companies who has done this for their final DWMP.</p> <p>For our final DWMP, we have included low, central and high climate change estimates. Our adaptive planning scenario shows how we might increase the role of surface water separation and sustainable drainage solutions to target delivering a reduction of internal and external sewer flooding alongside storm overflow discharge reductions for the RCP2.6 scenario. This is adapted from our preferred plan which considers RCP8.5.</p> <p>Our 7 L2 Area (L2) summary reports also show the impact of climate change scenarios on planning objective risk. www.nwl.co.uk/dwmp</p>	<p>Page 55, Section 11.3</p>
<p>Customer expectations: NWG has engaged stakeholders and customers quite thoroughly. However, it is acknowledged in the DWMP that customers' views on billing increases to improve drainage and wastewater management is unclear. Due to the timescales involved the plan does not take into account recent legislation such as</p>	<p>Addressed in plan.</p> <p>Our plans to address nutrient neutrality are included in Section 15 of our DWMP Technical Summary.</p> <p>Bill impact from our DWMP is described in Section 17.</p> <p>The full impact on bills will be addressed in our PR24 business plan.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 80, Section 15.0</p> <p>Page 94, Section 17.</p>

Comment	Northumbrian Water response	Change in final DWMP
Nutrient neutrality and/or the Government's potential drivers to encourage growth.		
<p>Long-term drivers: Whilst it is acknowledged that the Government have prioritised CSO operation reduction as a key driver, as a local authority and LLFA there are other priorities such as flood risk reduction and nutrient neutrality mitigation. From a planning perspective we welcome the ongoing dialogue with NWG to manage long term growth for housing and industry.</p>	<p>Addressed in plan. Our plans to address flood risk are included in Section 15.7 of our DWMP Technical Summary.</p> <p>Our plans to address nutrient neutrality are included in Section 15 of our DWMP Technical Summary.</p> <p>A description of how we manage growth is included in Section 5.0. This sets out our commitment to work in partnership with stakeholders including local authorities.</p> <p>Analysis of local authority data to support us in planning for growth is described in the Section 11.3 in our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 86, Section 15.7</p> <p>Page 80, Section 15.0</p> <p>Page 16, Section 5.0</p> <p>Page 54, Section 11.4.</p>
<p>Options: DCC would accept Option 2 as a minimum due to the importance of the NIPD projects which reduce flood risk and access government funding. However, we would welcome a more holistic cost benefit approach to the option choice. Whilst it is appreciated that socially the cost of living crisis is likely to impact the choice of option for individual customers, generally the overall benefits to society, businesses and the environment could be greatly improved with option 3 or 4, particular given the relatively small increase between these two options. Working in Partnership with other relevant stakeholders to share resources and access greater funding opportunities</p>	<p>Addressed in plan.</p> <p>Our approach to valuing benefits is described in Section 13.</p> <p>In our final DWMP we have an overall preferred plan which is:</p> <ul style="list-style-type: none"> • Best value + marginal green storm overflows • Best value sewer flooding + NIDP • Best value/least cost WINEP. <p>In our plan we also present alternative costs for storm overflows which are:</p> <ul style="list-style-type: none"> • Least cost storm overflow • Best value storm overflow. <p>These are detailed in Part C: Our DWMP in our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 67, Section 13.0</p> <p>Page 72, Part C: Our DWMP</p> <p>Page 76 and page 90</p>

Comment	Northumbrian Water response	Change in final DWMP
<p>can ensure multiple benefits to be realised, such as flood alleviation, environmental improvements /BNG, community and business resilience and/or growth, health and wellbeing.</p>		
<p>Respondent: Gateshead Council (via survey)</p>		
<p>Bill impact: Gateshead Council supports the collaborative working of Northumbria Integrated Drainage Partnership and catchment partnerships: recognising the benefits of flood alleviation and environmental schemes for our residents, businesses and wildlife. However, customer bills should not bear the burden of generating revenue required to invest in NWL's assets, to deliver necessary environmental improvements. Northumbrian Water has a responsibility to protect the environment, and funding for additional investment should come from NWL's shareholders.</p>	<p>Addressed in plan.</p> <p>Because of the huge investments that we need to make, we will need to borrow more money, our shareholders will have to put in more money and customers will have to pay more money in bills. Bills will start to increase from 2025. By 2060 we expect our DWMP would mean customers' annual wastewater bills will increase by £166 from the current bill of £187. However, changes in annual bills are also affected by other factors – including inflation and how well we deliver our services. We will consult further on the impact on bills across our water and wastewater services in the next few months as we finalise our Long-Term Delivery Strategy and Regulatory Business Plan for 2025-30</p>	<p><u>DWMP Customer Summary</u></p> <p>Page 10</p>
<p>Respondent: Customer (via survey)</p>		
<p>Flood risk and environmental enhancement: Supported increase in bills, but would want to hear exactly where the money was being spent.</p>	<p>Addressed in plan.</p> <p>Our plans to address flood risk and environmental enhancement are discussed in Part C of our DWMP Technical Summary.</p> <p>Our 7 Area (L2) summary reports show all planning objective risk for each L2 and how these change over the planning horizons. This includes the impact of differing climate change scenarios for how this effects flood risk. www.nwl.co.uk/dwmp</p> <p>A summary of programmes is included in Section 17.0</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 72, Part C: Our DWMP</p> <p>Page 94, Section 17.0</p>

Comment	Northumbrian Water response	Change in final DWMP
	Expected bill impacts for customers are detailed in Section 17.0	
/Respondent: Customer (via survey)		
Bills: For those who cannot afford the increase what would you do to help raise those funds?	Not addressed in plan. Details of affordability support will be addressed in PR24.	
Respondent: Customer (via survey)		
Bills: I would support a small rise in bills, however shareholder dividend would have to be reduced in line with the increase, also executive pay should also be reduced to help pay. The cost should not all be born by the customer.	Addressed in plan. Information on expected bill impacts for customers are included on Page 7, with further information in Section 17.0 of our DWMP Technical Summary.	<u>DWMP Technical Summary</u> Page 7 Page 94, Section 17.0
Respondent: Customer (via survey)		
Bills: Need to stop all the waste water coming from leaks in the network before i would be happy with increase	Not addressed in plan. Leakage is addressed in our Water Resources Management Plan.	N/A
Respondent: Customer (via survey)		
Bills: You are expecting us to pay for further improvements but all that will happen is the shareholders will get bigger payments. Time they put money back into the upgrades and repairs.	Addressed in plan. Information on expected bill impacts for customers are included on Page 7, with further information in Section 17.0 of our DWMP Technical Summary.	<u>DWMP Technical Summary</u> Page 7 Page 94, Section 17.0
Respondent: Customer (via survey)		
Bills: You only mention customers paying more for these improvements there is no mention of reduced shareholder dividend to bear the cost.	Addressed in plan. Information on expected bill impacts for customers are included on Page 7, with further information in Section 17.0 of our DWMP Technical Summary.	<u>DWMP Technical Summary</u> Page 7 Page 94, Section 17.0
Respondent: Customer (via survey)		

Comment	Northumbrian Water response	Change in final DWMP
<p>Sewage spills: Your options don't appear to show any aim or figures for reduction of sewage outflows into water courses and the sea. The summary only shows information on reduction of internal flooding. Preventing a few thousand internal floods a year should be lower priority than addressing sewage and other pollution of water courses and the ocean.</p>	<p>Addressed in plan.</p> <p>Information on our planning objective risks is shown in our DWMP Datatables. www.nwl.co.uk/dwmp</p>	
Respondent: Customer (via survey)		
<p>Bills: You're already making profits; take the money out of them.</p>	<p>Addressed in plan.</p> <p>Information on expected bill impacts for customers are included on Page 7, with further information in Section 17.0 of our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 7</p> <p>Page 94, Section 17.0</p>
Respondent: Customer (via survey)		
<p>Customer engagement: Promote it more widely and make it more accessible; MP's, local radio and tv. Integrate into school discussions that will make their way home and engage the next generation more closely with decisions effecting our water security and environment.</p>	<p>Addressed in plan.</p> <p>In Section 10.1, on page 45 of our DWMP Technical Summary we explain the types of engagement we have undertaken with a range of stakeholders and customers. This engagement and research have been used to help develop our options and constraining criteria and the plan we put forward for tackling storm overflows in our DWMP is based on the "preferred plan" coming from that customer engagement, incorporating customer views on affordability and their expectations on delivery and green solutions – while still meeting the Government's SODRP.</p> <p>In Section 19, on page 98 of our DWMP Technical Summary we have included a list of all of the stakeholders we have engaged with for our DWMP.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 45, Section 10.1</p> <p>Page 98, Section 19</p>

Comment	Northumbrian Water response	Change in final DWMP
	<p>Our Strategic Planning Group's Terms of Reference, list of representatives, meeting records and presentation can be found in the Technical Report area of the DWMP website www.nwl.co.uk/dwmp</p> <p>We can confirm that we have acted within the spirit and guidance of the DWMP framework.</p> <p>The Strategic Planning Group has carried out the duties under Section 3 of the DWMP framework, including:</p> <ul style="list-style-type: none"> • Enabled third party participation in the development of the DWMP • Provided a focal point where potential risks are exposed and shared • Facilitated external stakeholder engagement and promoted partnership working • Provided challenge and oversight when appropriate <p>We have discussed an ongoing role for the Strategic Planning Group in monitoring delivery of the DWMP and future updates.</p>	
Respondent: Customer (via survey)		
<p>Bills: I would support an increase in my bill if a pledge to reduce dividends and executive pay was clearly outlined.</p>	<p>Addressed in plan.</p> <p>Information on expected bill impacts for customers are included on Page 7, with further information in Section 17.0 of our DWMP Technical Summary.</p>	<p><u>DWMP Technical Summary</u></p> <p>Page 7</p> <p>Page 94, Section 17.0</p>
Respondent: Customer (via survey)		
<p>Funding: Do NWL's shareholders plan on chipping in for these improvements?</p>	<p>Addressed in plan.</p>	<p><u>DWMP Technical Summary</u></p>

Comment	Northumbrian Water response	Change in final DWMP
	Information on expected bill impacts for customers are included on Page 7, with further information in Section 17.0 of our DWMP Technical Summary.	Page 7 Page 94, Section 17.0