mua Water dWRMP

(Consultation Version)

2026

Document control

Document name	Draft Water Resources Management Plan
Document reference	Preconsultation
Author	Shaun Jones

Revision history

Version	Date	Revision notes
1.0	December 2024	First Version
2.0	February 2026	Changes made following pre-consultation EA feedback. See Statement of Response for details

Contents

Background

Water resources management involves a plan for how we will manage, develop and sustain an efficient and economical supply of drinking water to premises within our areas of appointment and the people who demand it.

The primary concern is how we intend to achieve a secure supply of drinking water for our customers, whilst at the same time protecting and enhancing the environment. Since we don't abstract from the environment ourselves yet, we are largely reliant on agreements with the incumbent water company for supply security, in the form of Bulk Supply Agreements.

Each five-year water resources management plan is developed to project the security of our drinking water sources over a twenty-five-year timeframe, with annual reviews conducted to enable flexible adjustments as needed.

Purpose

The purpose of this document is to provide colleagues with a method to follow to forecast supply and demand for each of our licenced areas and project these for a period of 25 years whilst at the same time reducing demand in line with government targets.

The plan equally serves the law driven purposes for communicating such plans for the benefit of regulators and other interested parties, such as our customers.

Scope

Water resource management plans apply to drinking water supplies and therefore apply to all our supply areas where we have been appointed as the statutory water undertaker.

Regulations and Guidance

As a licenced water undertaker, we have a duty to prepare, publish and maintain a water resource management plan under Sections 37A - 37D Water Industry Act 1991, and in accordance with the Water Resources Management Plan (England) Direction 2022

Section 37A of the Water Industry Act 1991 (Water resources management plans: preparation and review) provides that we must prepare, publish and maintain a water resources management plan. Section 37AA (Water resources management plans for England: resilience) gives the Secretary of State to Direct water companies how to prepare a water resources management plan.

Section 37B of the Water Industry Act 1991 (Water resources management plans: publication and representations) requires that a water undertaker shall:

(a) send a draft water resources management plan to the Secretary of State;
(b) state whether it appears to the undertaker that any information contained in that plan is or might be commercially confidential (as regards itself or another person); and
(c) give the Secretary of State the name of each such other person and his address for service of a notice under subsection (2)(a) below.

Section 37C of the Water Industry Act 1991 (Water resources management plans: provision of information) requires water supply licensees to provide information to water undertakers to help them with planning.

Section 37D of the Water Industry Act 1991 (Water resources management plans: supplementary) describes how Directions given under section 37A, 37AA or 37B in writing may be:

(a) general directions applying to all water undertakers; or
(b) directions applying only to one or more water undertakers specified in the directions,

Additional guidance is provided by the Environment Agency who publish supplementary and technical guidance.

Compliance

Water Resource Management Plans must adhere to the Water Resource Management Plan (England) Direction 2022 to meet the requirements of Sections 37A - 37D of the Water Industry Act 1991.

Table 1 below (Table 1 – Directed requirements for water resources management plan) lists each Direction, providing commentary and references to our plan to show compliance.

Planning period of water resources management plan		
Regulation	Duty	Reference or Commentary
Planning period of water resources management plan		
2(1)	Other than Southern Water Services Limited, a water undertaker must prepare a water resources management plan for a period of at least 25 years commencing on 1st April 2025.	Our Water Resource Management Plan is in Preparation
Matters to be addressed in The Water Resources Management Plan (England) Direction 2022		
3(1)	In accordance with section 37A(3)(d), a water undertaker must include in its water resources management plan a description of the following matters—	The matters required are described below:
3(1)(a)	the appraisal methodologies which it used in choosing the measures which it has identified in accordance with section 37A(3)(b) and its reasons for choosing those measures;	These are largely measures for identifying when the security of a supply is compromised and the review of Bulk Supply Agreements or other such actions as maybe necessary to ensure there is enough water available under a range of scenarios. See Section 2 - WRMP Methodology
3(1)(b)	for the first 25 years of the planning period, its estimate of the average annual risk, expressed as a percentage, that it may need to impose prohibitions or restrictions on its customers in relation to the use of water under each of the following—	Since we don't abstract or have resources of our own, we effectively mirror the likelihood of imposing prohibitions or restrictions of those published by the corresponding incumbent water company See Section 3 – Levels of Service
3(1)(b)(i)	section 76(b);	See Section 3 – Levels of Service
3(1)(b)(ii)	section 74(2)(b) of the Water Resources Act 1991(c); and	See Section 3 – Levels of Service
3(1)(b)(iii)	section 75 of the Water Resources Act 1991, and how it expects the annual risk that it may need to impose prohibitions or restrictions on its customers under each of those provisions to change over the course of the planning period as a result of the measures which it has identified in accordance with section 37A(3)(b);	See Section 3 – Levels of Service
3(1)(c)	the assumptions it has made to determine the estimates of risks under sub-paragraph (b), including but not limited to drought severity;	See Section 3 – Levels of Service
3(1)(d)	in respect of greenhouse gas emissions—	We a new water company without supplies, customers and conclude that our suppliers together with incumbent water companies will publish their greenhouse gas emissions, whilst ours would be negligible. See Section 4 - Greenhouse gas emissions
3(1)(d)(i)	the emissions of greenhouse gases which are likely to arise as a result of each measure which it has identified in accordance with section 37A(3)(b), unless that information has been reported and published elsewhere and the water resources management plan states where that information is available;	See Section 4 - Greenhouse gas emissions
3(1)(d)(ii)	how those greenhouse gas emissions will contribute individually and collectively to its greenhouse gas emissions overall;	See Section 4 - Greenhouse gas emissions
3(1)(d)(iii)	any steps it intends to take to reduce those greenhouse gas emissions;	

3(1)(d)(iv)	how these steps will support the delivery of any net zero greenhouse gas emissions commitment made by it; and	See Section 4 - Greenhouse gas emissions
3(1)(d)(v)	how these steps will support delivery of the UK government's net zero greenhouse gas emissions targets and commitments.	See Section 4 - Greenhouse gas emissions
3(1)(e)	the assumptions it has made as part of the supply and demand forecasts contained in the water resources management plan in respect of—	The implications of climate change on demand are subject of much speculation; different incumbents derive different values attached to which are different extremes of estimation. We have concluded that our approach to headroom together with triggers for reviewing bulk supply agreements, and the assessments made by incumbent water companies afford our customers sufficient protection. See Section 2 - WRMP Methodology (Headroom)
3(1)(e)(i)	the implications of climate change, including in relation to the impact on supply and demand of each measure which it has identified in accordance with section 37A(3)(b);	See Section 2 - WRMP Methodology (Headroom)
3(1)(e)(ii)	household demand in its area, including in relation to population and housing numbers, except where it does not supply, and will continue not to supply, water to domestic premises; and	Our areas of supply have a fixed property base and population.
3(1)(e)(iii)	non-household demand in its area, except where it does not supply, and will continue not to supply, water to non-domestic premises or to an acquiring licensee;	We do not have any commercial customers yet
3(1)(f)	its intended programme for the implementation of domestic metering including—	As a new water company, working on new developments, all of the properties will be metered from the start and as such there is no programme akin to the meaning of this regulation. See Section 5- Implementation of domestic metering
3(1)(f)(i)	the proportion of smart meters to other meters;	See Section 5- Implementation of domestic metering
3(1)(f)(ii)	if it does not intend to install smart meters, the reasons for this;	See Section 5- Implementation of domestic metering
3(1)(f)(iii)	its estimate of the cost of that programme, including the costs of installation and operation of meters;	See Section 5- Implementation of domestic metering
3(1)(h)	its estimate of the total number of domestic premises which will become subject to domestic metering during the planning period and including a breakdown of—	See Section 5- Implementation of domestic metering
3(1)(h)(i)	the number of domestic premises with smart meters;	See Section 5- Implementation of domestic metering
3(1)(h)(ii)	the number of domestic premises with meters that will not be charged by reference to volume;	See Section 5- Implementation of domestic metering

3(1)(h)(iii)	the number of domestic premises with meters that will be charged by reference to volume including—	See Section 5- Implementation of domestic metering
3(1)(h)(iii) (aa)	optant metering;	See Section 5- Implementation of domestic metering
3(1)(h)(iii)(bb)	change of occupancy metering;	See Section 5- Implementation of domestic metering
3(1)(h)(iii)(cc)	new build metering;	See Section 5- Implementation of domestic metering
3(1)(h)(iii)(dd)	compulsory metering; and	See Section 5- Implementation of domestic metering
3(1)(h)(iii)(ee)	selective metering;	See Section 5- Implementation of domestic metering
3(1)(i)	its estimate of the impact on demand for water in its area of any increase in the number of premises subject to domestic metering;	See Section 5- Implementation of domestic metering
3(1)(j)	its assessment of the cost effectiveness of domestic metering as a mechanism for reducing demand for water by comparison with other measures which it might take to meet its obligations under Part III of the Act;	See Section 5- Implementation of domestic metering
3(1)(k)	its intended programme to manage and reduce leakage, including anticipated leakage levels and how those levels have been determined;	Since we don't currently have any live networks, we don't know what our leakage levels will be against the assumptions made in our business model See Section 2 - WRMP Methodology (Leakage Assumptions)
3(1)(l)	if leakage levels are expected to increase at any time during the planning period, why any increase is expected and if so, the proposed plan of works that will be undertaken to mitigate this;	See Section 2 - WRMP Methodology (Leakage Assumptions)
3(1)(m)	how its intended programme to manage and reduce leakage will contribute to—	See Section 2 - WRMP Methodology (Leakage Assumptions)
3(1)(m)(i)	a reduction in leakage by 50% from 2017/18 levels by 2050; and	This regulation does not apply to us since we are a new regulation and have no leakage records from 2017/18 to reduce leakage by.
3(1)(m)(ii)	any leakage reduction commitment it has made in respect of its appointment area;	See Section 2 - WRMP Methodology (Leakage Assumptions)
3(1)(n)	In respect of any relevant regional water resources plan—	See Section 6 - Regional Water Resource Plan
3(1)(n)(i)	how this plan has been considered and reflected in its water resources management plan; or	See Section 6 - Regional Water Resource Plan
3(1)(n)(ii)	where the plan has not been considered and reflected in its water resources management plan, the reasons for this.	See Section 6 - Regional Water Resource Plan
3(2)	In this paragraph— "regional water resources plan" means a voluntary regional strategic plan produced by a regional group which identifies measures that may be taken for the purpose of improving the management and development of water resources. regional group" means one of the following recognised groups—	See Section 6 - Regional Water Resource Plan
(a)	Water Resources North;	We will need to join for the next planning period and have sent a request. www.waterresourcesnorth.org

(b)	Water Resources West;	We are an attendee of the group.
(c)	Water Resources East;	We will need to join for the next planning period and have sent a request. www.wre.org.uk
(d)	Water Resources South East;	We will need to join for the next planning period and have sent a request. www.wrse.org.uk
(e)	West Country Water Resources.	We have no applications for appointments in this area at the moment.
Submitting draft water resources management plans and water resources management plans to the Secretary of State		
4	Except where the Secretary of State otherwise directs and subject to sub-paragraph 4(c), for the purpose of section 37B(1) of the Act—	
(a)	Other than in the case of Southern Water Services Limited, a water undertaker must send a draft of its water resources management plan to the Secretary of State on or before 3rd October 2022;	Complete
Publication of draft water resources management plans		
5(1)	Except where the Secretary of State otherwise permits, a water undertaker must publish its draft water resources management plan in accordance with section 37B(3)(a) for consultation within 30 days beginning with the date on which the Secretary of State confirms it should do so	Complete
Responding to representations		
6	Except where the Secretary of State otherwise permits, a water undertaker must publish the statement required by regulation 4(2)(a) of the Water Resources Management Plan Regulations 2007(a), and send a copy of the statement to the persons specified in regulation 4(2)(b), within 26 weeks beginning with the date of publication of the draft water resources management plan	Complete

Table 1 – Directed requirements for water resources management plan

Preconsultation

We are Directed to send our first Water Resources Management Plan within 6 months of the date of your appointment to Defra prior to consultation.

Statement about National Security

We certify that this plan has been reviewed and does not contain any information that would compromise national security interests. Therefore, no information has been redacted from this document.

Statement about Commercial in Confidence

We confirm that our plan does not contains any information that may be commercially confidential.

Public Consultation

The Secretary of State provided approval to publish our water resources management plan for consultation by a wider stakeholder audience.

1. Introduction

Following our application, on the 31 August 2024, mua Water was appointed a statutory undertaker on the 21 June 2024 by the Water Services Regulation Authority (Ofwat). Like any other water company in England and Wales, including those colloquially referred to as incumbent water companies, we also benefit from all the same powers together with the responsibilities set out in law, including the requirement to prepare and maintain a Water Resources Management Plan.

At the time of writing this plan (31st October 2024) mua Water was appointed supplier and service provider for the following developments:

Development Name	Location	Bulk Supply Company	Ofwat Reference	Ofwat Licence Effective Date
Pearl Lane	Astley Cross	Severn Trent	043223	21st June 2024
Burleyfields	Stafford	Severn Trent	045632	21st October 2024
Whalley Old Road	Blackburn	United Utilities	045828	21st October 2024
Albert Street	Hebburn	Northumbrian	045620	31st October 2024

Table 2 – mua Water areas of appointment

At the time of writing, none of these sites have customers connected and are at various stages of development. Water supplies to these developments follow bulk supply arrangements, with sufficiency and security of supply largely driven by agreements between water companies.

There are government targets to reduce per capital consumption of drinking water initially by 2038 and again from 2050. We will provide feedback to customers about their usage within their bills together with the typical media campaign about the efficient use of drinking water.

Mua Water is growing rapidly, and our water resources management plan is expected to be overtaken by virtue of all the additional sites, supplies and customers that come online. This will naturally impact on the plan we consult on, but there is no way around this give the current regulatory framework.

This plan covers the statutory minimum period of 25 years (2025 – 2050) and represents our draft consultation plan for the current areas of appointment at the making of the draft plan. As new sites are licenced we will add them to the tables and update our plan. These will be published at least once a year, alongside our annual review, which will constitute a complex blend of actual empirical values collected from meter readings etc. together with forecasted data based around a methodology.

Our plan assumes that incumbent water companies have completed the necessary work associated with Ofwat's core scenario for long-term strategies and therefore see no implications for our plan in this regard.

As we increase in size, we will continue to submit NAV Applications to the Environment Agency and then use the data within as the basis for assumed supply and demand balance and scenario testing. As sites build out, we will integrate empirical data where this is available and update the water resources management plan accordingly and report each year as an addendum to the main

plan against the sites listed herein each year. At the start of the next planning period, we shall update the plan with all the assumptions and empirical data available at that time in respect of the number of appointed areas of supply at a point in time a few months ahead of the submission to the Secretary of State.

2. WRMP Methodology

There are several components to our method for water resource management, each dealt with here separately:

Population:

Population is an important component of water resource management since it is a crucial to determine per capita consumption of drinking water supplies, which in turn feeds in to demand.

We take a simple approach to calculating population and use the average household occupancy derived from national statistics UK average household size 2022 | Statista. This assumed occupation rate is applied to all domestic properties irrespective of size.

The rate is 2.36 persons per domestic property.

Per Capita Consumption:

This is the volume of water consumed typically expressed as litres per person per day.

In our planning tables we have reduced the PCC to 122 l/p/d from 2038 and to 110 l/p/d from 2050.

Per Capita Consumption Assumptions:

Typically, we negotiate the volume of drinking water that we agree to be made available to each supply site before we know the actual empirical volume that will be consumed; this is relevant because our supply areas are typically new housing developments with build out lead times stretching anywhere from 1 to 15 years, or more.

As customers are connected, we will naturally measure and record the volumes being consumed but to start with and make a water resources management plan, which is required to be a 25 year plan, we will apply the following assumptions:

Our method for determining PCC for this and all future applications is to either use the Incumbents Developer Incentive PCC or the Planning Authorities prescribed PCC. Where neither have been applied then we will select 125 l/p/d based on the current building regulations or else use 110 l/p/d for water stressed areas.

Water stressed areas are determined using the following publication –

https://www.gov.uk/government/consultations/determining-areas-of-water-stress-in-england

Please use this link to see the latest methodology consultation and maps for water stress areas.

Leakage Assumptions:

For each new supply area, we have assumed there will be a volume of water lost to leakage (or at least cannot be allocated) equating to 2.5% of the distribution input. We accept that for new developments the volume of water lost to leakage might be zero if the construction goes well, and that leakage is likely to increase over time. Whilst unlikely to reach national averages of leakage currently in the region of twenty percent, we have assumed the forecast rate of 2.5% based on our commitment to keep leakage rates low – for the following two reasons:

- We are committed to keeping leakage low because of environmental considerations
- Our business plan includes an assumed level of leakage of 2.5% from a financial management perspective

The determination of measured leakage will involve calculating the volume of water consumed based on customer meter readings and subtracting this value from the measured distribution input obtained from the bulk supply meter. This lost volume due to leakage will be internally reported monthly and annually as part of the WRMP annual review.

Our commitment is to maintain leakage levels at a maximum of 2.5%, as it is a crucial aspect of our financial business model. Any increase in leakage will prompt the allocation of resources to identify and repair leaks.

To effectively manage leakage, we have established agreements with national contractors to identify and repair leaks, which will be activated whenever leakage exceeds the 2.5% threshold.

Additionally, in cases where leaks occur on private property or supply pipes, we will utilize our authority to enforce water fittings regulations to prevent misuse, excessive consumption, and wastage on customer premises, ensuring that leakage levels are brought back to the forecasted levels.

We have no plans to use the Consistency of Reporting Performance Measures (UKWIR) methodology its complexity drowns out the simplicity of our appointed areas of supply and therefore disproportional in its impact on the resources our customers pay for.

Headroom:

For water resource plans, an allowance for uncertainties is expected. We encourage applicants to align applications with assumptions in statutory plans and make such an allowance (target headroom). If your estimated headroom target varies over the timescale of your WRMP, please use the worst-case scenario. For new applicants, you should explain the allowance you are making and ensure subsequent statutory plans align (or explain any differences within the plans).

In advance of our WRMP, we target a headroom of 10% of the distribution input to allow for uncertainties with our assumptions and to accommodate any short-term effects of warm weather, climate change and shocks to the system such as bursts, the need to flush or fire service usage.

- Uncertainties surround our assumptions for:
- Occupancy rate (might be higher than predicted)

- Demographic attitudes to water conservation / behavioural change to 110 l/p/d
- Leakage

10% Headroom is proportional to the reported 11.4% increase in consumption during the pandemic lockdown experienced by another NAV Operator, which is supported by evidence.

The rationale behind these values stems from discussions with the Water Resources South East Resource Management Group, who identified that a headroom range of 5 – 8% was utilised by incumbents in the region. Moreover, data from other NAVs employing a UKWIR risk assessment approach indicates that their values align with those determined by the incumbents.

Upon comprehensive consideration, we determine that a 10% headroom target is deemed sufficient for safeguarding drinking water supplies, barring unforeseen circumstances such as a pandemic-induced lockdown. Therefore, this target has been implemented throughout the current planning period.

We recognise that climate change is something we should be aware of and plan for but the values used and uncertainty that surrounds those used by incumbents appear to make any estimation questionable. In lieu of using a derivative or apply different values for different incumbent areas of supply we have concluded that the contractual agreement with the incumbent and the triggers for its revision is sufficient to protect our customers.

Furthermore, given that the incumbents water resource management plan would cover the needs of our customers in their planning and investments we also conclude that our customers are similarly afforded sufficient protection.

Outage:

We don't abstract or have our own sources and therefore conclude that outage doesn't apply. We have therefore made no allowance in our planning tables. The associated incumbent water companies have made such allowances and therefore we further conclude that our customers are protected.

Our Bulk Supply Agreements:

Currently, all our drinking water is supplied by virtue of Bulk Supplies with the relevant incumbent water company. It is recognised that the volume of water agreed upon being available for use by each appointed area include a Headroom volume above the volume expected to be consumed or otherwise lost to leaks.

This Headroom volume is to accommodate extreme demand heightening consumption of all types but specifically those weather-related including periods of dry and hot weather.

The Headroom provides a safeguarding volume of drinking water that's aligned to the extreme increase in household consumption experienced during Covid19 which was measured by one water company as a 11.4% increase.

As such, 10% can be considered a reasonable level of margin for all but an extreme situation.

In parallel to the drought plan outlined above, our water resources management plan requires us to take demand reducing action (customer messaging and increased leakage detection) when the volume of water consumed is within 5 to 10 % of the agreed water available for use.

Where the headroom can't be maintained under normal conditions because of consumption reliably needing it then renegotiation of agreements will be triggered – revised agreements can take one month to put in place.

There are no termination dates on any of the Bulk Supply Agreements and therefore they will be in force for the period of the plan.

Security of Supply (Scenario Testing)

We have carried out a number of tests for different scenarios to determine whether the volume available for use is safeguarding, together with the headroom values applied.

We have typically used the average PPC of 145 l/p/d together with 10 % leakage for testing.

Pearl Lane

				Daily Volumes / day	
	PCC	Occupancy	No. Properties	97609.60	Total Distribution Input
Consumption	110	2.36	329	85408.40	
Leakage	0.025			2440.24	
Headroom	0.1			9760.96	

Scenario 1 (PCC increase to 125)

				Daily Volumes / day	
	PCC	Occupancy	No. Properties	110920.00	Total Distribution Input
Consumption	125	2.36	329	97055.00	
Leakage	0.025			2773.00	
Headroom	0.1			11092.00	

Scenario 2 (PCC increase to 145)

				Daily Volumes / day	
	PCC	Occupancy	No. Properties	128667.20	Total Distribution Input
Consumption	145	2.36	329	112583.80	
Leakage	0.025			3216.68	
Headroom	0.1			12866.72	

Scenario 3 (PCC increase to 145 and leakage to 10%)

				Daily Volumes / day	
	PCC	Occupancy	No. Properties	140729.75	Total Distribution Input
Consumption	145	2.36	329	112583.80	
Leakage	0.1			14072.98	
Headroom	0.1			14072.98	

These tests show that under a range of tests, the volumes reman less than the bulk supply agreement or water available for use. Our WRMP will contain scenario tests to demonstrate a secure supply system.

Assumed / Targeted:	l /day
Domestic Usage: 110 l/p/d	204,045.60
Leakage: 2.5%	5,829.87
Headroom: 10%	23,319.50
Total (*Consumption (Leakage + Usage)*	209,875.47
Bulk Supply Agreement	379,362.90
Surplus / Deficit	169,487.43

Scenario 1 (PCC increase to 125)

	l /day
Domestic Usage: 125 l/p/d	204,045.60
Leakage: 2.5%	5,829.87
Headroom: 10%	23,319.50
Total (*Consumption (Leakage + Usage)*	209,875.47
Bulk Supply Agreement	379,362.90
Surplus / Deficit	169,487.43

Scenario 2 (PCC increase to 145)

	l /day
Domestic Usage: 145 l/p/d	268,969.20
Leakage: 2.5%	5,829.87
Headroom: 10%	23,319.50
Total (*Consumption (Leakage + Usage)*	274,799.07
Bulk Supply Agreement	379,362.90
Surplus / Deficit	104,563.83

Scenario 3 (PCC increase to 145 and leakage to 10%)

	l /day
Domestic Usage: 145 l/p/d	268,969.20
Leakage: 10%	23,319.50
Headroom: 10%	23,319.50
Total (*Consumption (Leakage + Usage)*	292,288.70
Bulk Supply Agreement	379,362.90
Surplus / Deficit	87,074.20

Whalley Old Road

Assumed / Targeted:	l /day
Domestic Usage: 125 l/p/d	27,435.00
Leakage: 2.5%	783.86
Headroom: 10%	3,135.43
Total (*Consumption (Leakage + Usage)*	28,218.86
Bulk Supply Agreement	36,270.00
Surplus / Deficit	8,051.14

Scenario 1 (PCC increase to 145)

Scenario 1:	l /day
Domestic Usage: 145 l/p/d	31,824.60
Leakage: 2.5%	783.86
Headroom: 10%	3,135.43
Total (*Consumption (Leakage + Usage)*	32,608.46
Bulk Supply Agreement	36,270.00
Surplus / Deficit	3,661.54

Scenario 3 (PCC increase to 145 and leakage to 10%)

Scenario 2:	l /day
Domestic Usage: 145 l/p/d	31,824.60
Leakage: 10%	3,135.43
Headroom: 10%	3,135.43
Total (*Consumption (Leakage + Usage)*	34,960.03
Bulk Supply Agreement	36,270.00
Surplus / Deficit	1,309.97

These tests show that under a range of tests, the volumes reman less than the bulk supply agreement or water available for use. Our WRMP will contain scenario tests to demonstrate a secure supply system.

Albert Street:

Assumed / Targeted:	l /day
Domestic Usage: 125 l/p/d	24,190.00
Leakage: 2.5%	691.14
Headroom: 10%	2,764.57
Total (*Consumption (Leakage + Usage)*	24,881.14
Bulk Supply Agreement	28,315.58
Surplus / Deficit	3,434.44

Scenario 1 (PCC increase to 145)

Scenario 1:	l /day
Domestic Usage: 145 l/p/d	28,060.40
Leakage: 2.5%	691.14
Headroom: 10%	2,764.57
Total (*Consumption (Leakage + Usage)*	28,751.54
Bulk Supply Agreement	28,315.58
Surplus / Deficit	-435.96

Scenario 2 (PCC increase to 145 and leakage to 10%)

Scenario 2:	l /day
Domestic Usage: 145 l/p/d	28,060.40
Leakage: 10%	2,764.57
Headroom: 10%	2,764.57
Total (*Consumption (Leakage + Usage)*	30,824.97
Bulk Supply Agreement	28,315.58
Surplus / Deficit	-2,509.39

If during the build out the data suggests either of these scenarios are likely then we would renegotiate the bulk supply agreement. By way of reassurance, the network is unlikely to be leaky for several years to come and the properties are built to achieve 125 l/p/d.

If we can negotiate the bulk supply agreement to cover these scenarios from the outset then we will; However, the values have been provided by the incumbent as I believe all agreements are made.

3. Levels of Service

We acknowledge the need to provide the average annual risk for the first 25 years of the planning period, expressed as a percentage, of the estimated likelihood for the need to impose prohibitions or restrictions on our customers in relation to the use of water so that our customer can appreciate the Level of Service.

As discussed before, we don't abstract water or have sources of water of our own yet, so its our policy to mirror the Levels of Service reported by the incumbent water companies with whom we have Bulk Supply Agreements and Appointments for:

Severn Trent have not changed their levels of service for restrictions since 2014 and the table below is from their draft WRMP for 2024:

Drought Restriction	Our levels of services	2020-25	2025-30	2030-35	2035-40	2040-45
Temporary Water Use Ban	3 in 100 years (3% annual risk)	3%	3%	3%	3%	3%
Ordinary Drought Orders (Non-Essential Use Restrictions)	3 in 100 years (3% annual risk)	3%	3%	3%	3%	3%
Emergency Drought Orders	We consider these unacceptable	<0.2%	<0.2%	<0.2%	<0.2%	<0.2%

United Utilities 2024 WRMP includes the following levels of service

Event	Current	2025–2031	2031–2040	2040–2050
Temporary use bans	Once every 20 years on average (5 per cent annual average chance)	Once every 20 years on average (five per cent annual average chance)	Once every 40 years on average (2.5 per cent annual average chance)	Once every 40 years on average (2.5 per cent annual average chance)
Drought permits and drought orders to augment supply	Once every 40 years on average (2.5 per cent annual average chance)	Once every 40 years on average (2.5 per cent annual average chance)	Once every 50 years on average (2 per cent annual average chance)	Once every 50 years on average (2 per cent annual average chance)
Drought orders to ban non-essential water use	Once every 80 years on average (1.25 per cent annual average chance)	Once every 80 years on average (1.25 per cent annual average chance)	Once every 80 years on average (1.25 per cent annual average chance)	Once every 80 years on average (1.25 per cent annual average chance)
Emergency drought orders (e.g. rota cuts and standpipes)	Once every 200 years on average (0.5 per cent annual average chance)	Once every 200 years on average (0.5 per cent annual average chance)	Once every 200 years on average (0.5 per cent annual average chance)	Once every 500 years on average (0.2 per cent annual average chance)

4. Greenhouse gas emissions

In respect of greenhouse gas emissions, we conclude that at our current stage of maturity our emissions are next to nil because we have no customers, no supplies and are a growing company which utilises contractors for almost all our work. We conclude that the emissions by incumbent water companies together with our contractors will be published by them.

As our business develops then a more meaningful estimation of CO_2 emissions would be possible.

We support the delivery of the UK government's net zero greenhouse gas emissions targets and commitments and will follow any guidance to achieve this. We see our main role as reducing per capita consumption (water efficiency) together with leakage. In addition, we will endeavour to collect data, maintain our networks with minimal impact on the environment.

We are also keen to recycle water for toilet flushing and garden irrigation and invest in sustainable urban drainage solutions to ensure we aren't treating rainwater unnecessarily and return it to the environment in a low carbon way.

5. Implementation of domestic metering

We require that every domestic property must have one WRAS approved high precision water meter installed that complies with the Water (Meters) Regulations 1988, and that typically the meter is installed in meter boxes located at the highway boundary of the property, unless otherwise agreed.

As such our intended programme for the implementation of domestic metering is universal smart metering. The cost of the programme is built into our investment for the adoption of supply sites that are typically new green or brownfield developments of new housing.

We estimate that all the domestic premises within our supply areas will be subject to domestic metering during the planning period and that the estimated impact on the levels of demand will be less than the volumes we have made available through our bulk supply agreements.

As we record and collect more data, we will be able to carry out meaningful assessments of the cost effectiveness of domestic metering together with the associated levels of demand. For the moment, we have no connected customers and no data; hence our water resource management plan being based on a method and assumptions.

Table 3 - Domestic meter installations; summarises the situation we expect when the four supply areas are fully mature. We currently have no meter installations, and no customers connected.

Meters will be read at least twice a year, until such time as the data infrastructure is installed and commissioned that can make use of the AMI readiness of the meters used. This will provide the necessary insights and customer engagement that will help achieve the targeted drinking water efficiencies for per capita consumption.

Summary of domestic meter installations

Development Name	Ofwat Reference	Number of Domestic Properties with Smart Meters	Smart Meter Saturation (%)	Number of Domestic Properties with Meters Not Charged by Reference to Volume	Number of Domestic Properties with Meters Charged by Reference to Volume	Optant Metering	Change of Occupancy Metering	New Build Metering	Compulsory Metering	Selective Metering
		Relevant Direction								
		3(1)(h)(i)	3(1)(f)(i)	3(1)(h)(ii)	3(1)(h)(iii)	3(1)(h)(iii) (aa)	3(1)(h)(iii) (bb)	3(1)(h)(iii) (cc)	3(1)(h)(iii) (dd)	3(1)(h)(iii) (ee)
Pearl Lane	043223	329	100	0	329	0	0	329	0	0
Burleyfields	045632	786	100	0	786	0	0	786	0	0
Whalley Old Road	045828	93	100	0	93	0	0	93	0	0
Albert Street	045620	100	100	0	100	0	0	100	0	0

Table 3 – Domestic meter installations

6. Regional Water Resource Plan

We attend the Water Resource West planning group where our appointed areas of supply reside and have applied to join three others because we have applications for appointments pending. Whilst we are a member of the Water Resource West Group, and whilst we have sought to align our plan; for the moment where the plan has not been fully considered and reflected in our water resources management plan, the reason that we don't have customers or supplies, or empirical data to make meaningful assessments.

As we grow and develop our plans; inevitably our plan will become increasingly aligned and reflective of regional and national plans.

7. Strategic Environmental Assessment (SEA) and a Habitat Regulation Regional Water Resource Plan

The Water Resource Planning Guidelines states that we must consider the need to carry out a Strategic Environmental Assessment (SEA) and a Habitat Regulation Assessment (HRA). However, we are a new water company and don't have any schemes with the potential to impact the environment in the way we think this requirement applies. We've checked both Severn Trent and United Utilities current and draft plans and can see that they have carried out such assessments where necessary.