

# Chapter 10: Making it happen – our delivery plan for 2025 to 2030

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## 10. Making it happen – our delivery plan for 2025 to 2030

In this chapter we explain how we will deliver our outcomes and achieve the level of performance that we are targeting between 2025 and 2030. It is an integrated delivery plan, that combines wholesale and retail activity and is enabled by technology, data and innovation. For each outcome, we explain the schemes and activities we will progress that will contribute to the delivery of our performance commitments, highlighting where interventions will deliver multi-benefits and greater value to our customers and the environment.

#### A. Introduction to our delivery plan

- Our business plan for 2025 to 2030 sets out the outcomes we will deliver for our customers and the environment. We explain what these are and the level of performance we are targeting over the next five years and beyond in Section 6: The outcomes we will deliver.
- 2. In this chapter we explain how we will deliver our plan. We explain the activity we will carry out and the investment we will make to deliver our outcomes and achieve our performance commitments. Where enhancement expenditure is required, separate enhancement cases have been prepared that provide detailed evidence of the need for the investment, our options appraisal, and the wider benefits it will deliver.
- 3. We have four customer priorities which capture the outcomes we will deliver, they are to:
  - Provide high quality water from sustainable sources;
  - Deliver a resilient drinking water supply from source to tap and minimise wastage;
  - Reduce your water footprint and charge a fair, affordable price; and
  - Improve the environment and have a positive impact on our local area.
- 4. For each we explain how we will deliver improvements for customers and the environment through our performance commitments (PCs) and describe the additional PCDs and metrics we will use to monitor our performance against our targets. This is summarised in the figure below.



Figure 1: Summary of PC, PCDs, Metrics, and actions that we will take over PR24



Source: SES Water

#### B. Provide high quality water supplies from sustainable sources

- 5. This priority is focused on ensuring the water we provide is always of the highest quality our customers' highest priority. It will be delivered primarily through our ongoing programme of maintenance, stewardship of our assets and strong operational performance. We will make targeted investment where needed to protect the quality of our water and continue to soften our water supplies, in-line with our legal requirement.
- 6. Catchment management schemes will continue to be used to mitigate risks to raw water quality, particularly around our more rural sources of water. In the more urbanised north of our region, protecting our water sources from pollution is more challenging and urgent and requires us to enhance our treatment process. We will do more to remove lead pipes from our network, in-line with our customers' expectations.
- 7. We will also investigate whether the sources we rely upon today are sustainable for the future. These investigations will inform our long-term plan to secure our future water supplies.

#### High quality water supplies

8. Receiving high quality water is our customers' top priority. Our compliance risk index (CRI) performance has consistently been better than the industry average in the current AMP and we intend to remain an upper-quartile performer, aiming to deliver a CRI of 0.0 annually throughout the period.





9. Effective operation and maintenance of our assets with targeted investment is fundamental to continuing to deliver strong performance. Maintaining serviceability of our existing asset base is the optimal approach and will primarily be funded though ongoing base expenditure. Where additional activity is required – including to manage current and future risks or meeting higher drinking water standards – we will need enhanced funding. Our plans for maintaining CRI at upper-quartile levels comprise the following areas.

#### Water treatment works refurbishments and upgrades

- 10. We will continue to deliver capital maintenance interventions across our water resource, treatment and distribution network assets, along with operating and maintaining these sites so we maintain our record of water quality performance. Our modelling of these capital interventions delivered through base expenditure is set out in Appendix SES052 Pioneer Modelling.
- 11. Our approach is to undertake extensive capital maintenance on one of our five main sites every five years. This approach enables us to deliver a broad scope of work more efficiently on a single site, while at the same time, smoothing capital expenditure across the AMPs (by not delivering two or more large schemes in any single AMP).
- 12. We will deliver a major capital refurbishment of our Kenley WTW in the PR24 period from base expenditure. Kenley received its last significant upgrade in 1989. We will invest around £20m to maintain serviceability and water quality performance, of which £11.8m is required to improve softening performance from the levels seen in the current AMP. We will also replace existing ultraviolet (UV) treatment facilities at our Bough Beech and Elmer WTWs.
- 13. Deteriorating raw water quality and the risk of Cryptosporidium contamination in several urban aquifers in the north of our region requires us to enhance the treatment process at both Cheam and Kenley WTW by installing new UV treatment to protect drinking water quality. The action is supported by the DWI (Appendix SES011A: UV installation) and is detailed in Appendix SES006: Water Quality Enhancement Case. This work will be delivered in years two and three of AMP8.

#### Run to waste facilities

14. In order to meet the DWI's expectations for water quality resilience, all water treatment works need to have facilities in place to dispose of water that doesn't meet water quality standards within the treatment process, before it's put into supply. We already have facilities at our Cheam, Godstone and Bough Beech works. Between 2025 and 2030 we will install further run to waste facilities at our Elmer, Kenley and Westwood treatment works. This work requires £0.83m of enhancement expenditure during AMP8 and is detailed in Appendix SES007: Enhanced Resilience – Treatment Works and Processes Enhancement Case. It will involve the installation of additional pipelines that route water from either the contact or treated water tanks back to the head of the works (where feasible) or to waste (if not). This approach minimises additional expenditure and the environmental impact by re-using the water where possible. As well as delivering regulatory compliance, it will contribute to our continued improvement in unplanned outage. This work therefore minimises compliance risk while improving resilience.

#### Ongoing investment in and calm operation of our distribution network

15. Maintaining a calm network by minimising reactive repair and maintenance activities is essential in providing high quality drinking water supplies. We will continue to invest in targeted mains replacement, through base expenditure that will assist in lowering the risk of network incidents potentially impacting CRI. This also reduces risk of pollutions and customer contacts about water as well as contributing to reducing leakage, mains bursts and supply interruptions, all of which we currently perform in the upper quartile.





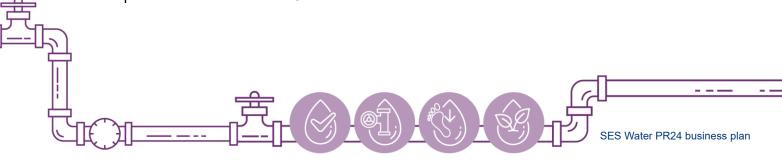
16. Our smart network and DMA Asset Health initiatives are already helping to inform our investment and operational decisions and will play a greater role as we continue to develop and embed them across or network.

#### Water quality contacts - taste, smell and odour

- 17. Our water quality contacts performance (covering taste, odour and discolouration contacts (TOD) has consistently been upper quartile with us receiving around 50% fewer contacts than the industry average. The way in which TOD contacts are recorded has recently changed and now includes contacts via social media channels, which is inevitably increasing the number we receive and is likely to continue to do so as we become more active on a wider range of platforms to help us reach and engage with more customers. The underlying causes of TOD contacts are:
  - (a) Softening underperformance circa 24 contacts per year;
  - (b) Third party use of fire hydrants circa 45 contacts per year; and
  - (c) Reactive network activity (such as mains bursts and repair) between 55 and 82 contacts per year.
- 18. We will maintain our strong performance as it is vital our customers continue to have confidence in the quality of our water. The action we take over the coming five years will offset the impact of the change in how we record contacts. Funded through base expenditure we will:
  - Make our softening process more resilient to weather conditions and short-term outages to halve the number of contacts relating to water hardness;
  - Continue to prosecute third parties for the unauthorised use of fire hydrants and use our smart network to help identify repeat offenders, openly publicising when we do and awarding a sum equal to any fine to a local charity; and
  - Continue to improve our operational practices and communications with customers when work we carry out could result in a change to TOD.

#### WINEP - drinking water protection

- 19. We will deliver two catchment schemes between 2025 and 2030 to protect our groundwater sources at Brewer Street from nitrate pollution and our sources in the River Eden catchment from the pesticide flufenacet. Taking a catchment-based approach and working in partnership with other land and water users offers a more sustainable and cost-effective way of tackling water quality issues, when there is time to do so, and delivers wider benefits to the environment and local communities such as increasing biodiversity, reducing carbon emissions and providing amenity value.
- 20. Two investigations are also proposed for AMP8. The Leatherhead groundwater/River Mole investigation builds on a scheme we are currently running in the Leatherhead area, looking at the influence the wider Mole surface water catchment could be having on groundwater nitrate. Similarly, an investigation into the Epsom and North Downs chalk waterbody will investigate the sources and pathways of nitrate impacting on water quality in three groundwater safeguard zones (comprising 14 separate boreholes). Full details of the schemes and investigations can be found in Appendix SES010: Environmental Improvement Enhancement Case.



#### Lead replacement

- 21. Lead pipes in the supply network presents an issue for all water companies. Used in the construction of supply and plumbing systems until the 1970s, it remains comparatively widespread across the UK, including within our region. Currently, around 100,000 (or 45%) of communication pipes connecting our network to customers' supplies are made of lead. We have an ongoing commitment with the DWI to continue to remove lead from our network and promote the removal of customer-owned lead pipework.
- Our lead strategy is to continue using orthophosphoric acid, which minimises the risk of lead leaching into customers' water supplies, while taking a risk-based approach to removing lead from our network. Our customers expect us to invest in lead removal, with 75% of customers surveyed in our Bespoke 2 research choosing an option that included the additional removal of lead pipes that supply schools, colleges and nurseries to help make these premises, frequented by young people who are most at risk from lead exposure, lead free. As a result, we are extending our lead reduction strategy in AMP8 to deliver this. Our strategy comprises elements of both base (ongoing from current or previous AMPs) and enhancement expenditure (new for AMP8) activity, set out in the table below. Our lead enhancement case can be found in Appendix SES006: Water Quality Enhancement.

**Table 1: Lead replacement strategy** 

Investment	Activity				
	Maintain an enhanced monitoring strategy				
	Free customer lead checks				
	Analysis and action in hot-spot areas				
	Reactive replacement of communication pipe when lead detected >5ug/l				
Base	Offer to replace customer supply pipe when lead detected >10ug/l				
Dase	Proactive replacement of lead pipes during mains replacement				
	Replacement of communication pipe when customer replaces their supply pipe				
	Proactive replacement following leakage or other non-quality reason				
	Customer education on risk of lead				
	Investigate the proactive replacement of service pipe on Common Services				
Enhancement	Replace lead communications and supply pipes at circa 170 schools, colleges and nurseries to provide a lead-free drinking water supply at these premises				

Source: SES Water

23. We expect to remove 2,875 lead communications pipes and 275 of these properties will be offered replacement of their supply pipes through base expenditure. Our enhancement expenditure will deliver 170 service pipe removals and is set out in Appendix SES006: Water Quality Enhancement. This will be subject to a PCD, further details on which are provided in Appendix SES063: Price Control Deliverables and Additional Reporting Metrics.



#### Creating lead-free schools, colleges and nurseries

World Health Organisation (WHO) studies demonstrate the potential impact lead can have on the human body, particularly youngsters as they develop. Recognising this, In AMP5, we completed the removal of lead communications pipes from all schools in our region. In AMP8, we propose to go a step further, and commence a programme of work to remove all lead supply pipe through to a central point in each establishment and remove lead communication and supply pipes in nurseries. At the same time, we will look to install a 'hydration station' and leave the school with options to subsequently consider re-piping elements of their internal plumbing considered important for other drinking water supplies.

The unit cost of this work would be £20,000 per establishment, covering the cost of the replacement of any lead supply pipes and the provision of an appropriate water fountain. With £3.4 million of investment, we expect to deliver this solution to around 170 schools and nurseries between 2025 and 2030. We will promote the benefits of the scheme, provide reassurance, minimise disruption, and build a positive and long-lasting relationship with the schools and nurseries we work with which could extend to further water efficiency work and wider education opportunities. We will carry out targeted communications activity and provide help, advice and ongoing updates to the establishments we work with.

#### **Softening**

- 24. We have a unique statutory requirement to partially soften around 80% of the water we supply to customers across our region. This is done at five of our eight treatment works those which abstract water from predominantly chalk aquifers. This requirement has been in place for over a hundred years, and we will continue to deliver against our bespoke performance commitment over the course of the next AMP.
- 25. Water is abstracted with an average calcium content of around 121mg/l and is softened using specific treatment processes to a concentration of 80mg/l which is categorised as medium-hard water before distribution across our supply network. This softening process is achieved through the addition of chemicals to react with the dissolved calcium in the untreated water, prior to additional processing to remove and where possible recycle the by-products of the process. This softening process is therefore comparatively more carbon intensive than other aspects of the water treatment process.
- 26. As this requirement to soften is not common to the UK water industry, the costs associated with this are not captured in Ofwat's cost modelling. As has been the case with previous AMPs, we have submitted a cost adjustment claim (CAC) which sets out both the operating and capital costs specifically driven by our softening obligation. This CAC is included at Appendix SES029: Cost Adjustment Claim Softening.
- 27. We will deliver against this performance commitment, providing partially softened water throughout the AMP. We will also continue to invest base expenditure in our softening treatment assets during this AMP to maintain their serviceability, with the largest proportion of capital expenditure being delivered at our Kenley treatment works.

#### Sustainable abstraction

28. We abstract 85% of the water we supply from underground chalk and greensand sources. Some of these sources support flows in the Hogsmill, Wandle and Darent rivers – all of which are chalk streams. In the future, it may not be sustainable for us to continue to abstract water from these sources at the rate we do today. Changes may be made to our abstraction licences that determine how much water we can take and when.





#### **WINEP - Abstraction investigations**

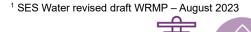
- 29. We will carry out investigations in the Hogsmill, Wandle, Darent, Eden and Beverley Brook catchments to understand the likely impact of our abstractions in the future, in the face of climate change. We will also contribute to a region-wide investigation led by Water Resources South East (WRSE). These investigations, which form part of our statutory WINEP, will determine what changes to our licences are required and when they will be needed. This will inform our future Water Resources Management Plan (WRMP)¹. Further details can be found in Appendix SES010: Environmental Improvement Enhancement Case.
- 30. We have, through our WRMP and LTDS, planned for a range of future abstraction reduction scenarios. In most cases our work to reduce leaks, wastage and customer consumption will enable us to make up the water we can no longer abstract, however if we need to leave up to 30 million litres of water per day in the environment, we could need to develop new water sources in the future, which will be confirmed in future WRMPs.

#### **Alternative water sources**

- 31. Our WRMP contains a range of demand-side reduction activities which will reduce distribution input through reductions in per capita consumption, business demand and leakage. However, we will also undertake trial activity to explore the scale of benefits that could be provided though the introduction of large-scale rainwater harvesting and greywater recycling. To date, such schemes have been difficult to install in existing premises, particularly homes. However, retrofit technology is now successfully being installed in commercial premises and the opportunity to apply this to household premises is improving. We recognise both new-build and retrofit installs of alternative water sources is a non-regulated market and will operate largely outside of the remit of water companies. However, we will play a facilitation role in its ongoing development, working with developers, local authorities and technology providers seeking support via the Ofwat water efficiency innovation fund to establish and deliver pilot new-build installation schemes.
- 32. Our objective is to work in partnership to prove the concept and provide the technical, financial and reputational justification for such solutions to be widely considered in all future new-builds. Such an arrangement could reduce or even remove the requirement for network reinforcement (upgrades) for some new developments, and potentially reduce average PCC to less than 80l/hd/day, significantly reducing the environmental impact of new developments within our region. We would hope that this would inform future building standards so more water efficient homes are built.

## C. Deliver a resilient water supply from source to tap and minimise wastage

- 33. Our customers expect a reliable supply of water, and they expect us to plan ahead for climate change and other factors that could impact on our ability to provide their water supplies. We are focused on making sure our system of water treatment works, pumping stations and underground pipe network are resilient to more extreme weather events. We will mitigate future risks so that our assets remain in good condition, reduce levels of outage at our water treatment works and lower the number of water main bursts. This in turn will lower the chance of our customers having their water supplies interrupted.
- We will also carry out extensive activity to reduce leaks for our network and our customers' supply pipes, something our customers have told us to prioritise.



### Resilience of our water treatment works to climate change and other events

- 35. Our water production facilities must be constantly available to reliably meet our customers' demands and usage patterns, particularly during periods of prolonged, dry weather where we typically see higher demand. We also need to make sure they continue operating during more extreme weather events and are resilient to other threats and pressures.
- 36. Unplanned outage is a metric for assessing the health and performance of our water treatment works by measuring how much of the works' full capacity is unavailable. At around 1.1%, our unplanned outage performance has averaged less than half of the industry average over the current AMP and in the last year, improved further to upper quartile performance. Our sites are designed to be resilient, benefitting from larger treated water tank storage than most other sites across the UK, providing extra protection for customers in the event of short-term outages.
- 37. Analysis of our unplanned outage so far this AMP shows there are three direct causes:
  - Over-running planned engineering works (50%);
  - Power outages (35%); and
  - Plant/instrument failure (15%).
- 38. During AMP8, we are targeting unplanned outage of 1.0% throughout, which will be delivered through effective operation and maintenance of our treatment works. We have identified targeted investment to make our treatment works more resilient to existing risks and to enhance how we monitor and manage our production process through expanding the use of smart technology across our treatment works and pumping stations. Details of the investment summarised in this section can be found in Appendix SES007: Enhanced Resilience Treatment Works and Processes Enhancement Case.

#### Increasing resilience to power outages

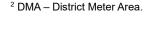
39. To increase our resilience to power outages, we will be investing £1.2m to install auto-synchronisation change-over technology at Bough Beech water treatment works. This will enable standby generation to cut-in seamlessly when external grid power supplies fail. Bough Beech suffers from regular and increasing short-term power outages due to supply or quality issues in the local distribution network operator system, which causes the site to shut down, risking customer supplies. Furthermore, we and the sector have been asked to draw scenarios up for dealing with rolling power cuts as a realistic future scenario. We will also install generator connection points at all our pumping station and boreholes sites so we can connect backup generators more quickly and easily.

#### Bypass programme for service reservoirs

40. We will put bypass arrangements in place around our service reservoirs that supply critical customers including Gatwick Airport and East Surrey Hospital. This investment of £0.5m will increase our resilience as we will be able to transfer water directly from our treatment works into the DMA<sup>2</sup>, if a service reservoir, which provides local storage, goes out of service.

#### **Flood protection**

41. Environment Agency assessments of river and surface water flooding risk confirms four of our operational sites are currently defined as at high risk of flooding. Three of these









relate to surface water flooding, and work has already been undertaken on site to mitigate these risks. The remaining site – Leatherhead pumping station, which also houses a number of raw water boreholes, is at risk of fluvial flooding from the adjacent River Mole. This risk is heightening due to the increasing instances of rapid rises in river level, shown in the figure below.

River Mole @Leatherhead 1986-2022
Number of days with RoC >10m3/sec

120

100

80

40

20

1980s (pro-rated) 1990s 2000s 2010s 2020s (pro-rated)

Figure 2: Historic River Mole rate of change data

Source: National River Flow Archive (nrfh.ceh.ac.uk)

42. The River Mole is the largest catchment within our region. Alongside the flooding risk at Leatherhead PS (and surrounding communities), we also experience water quality challenges associated with the flow characteristics of the river. We will investigate whether the increased flooding risk can be mitigated though catchment management activity, and if nature-based solutions can play the primary role in mitigating flood risk and improving water management across the catchment as opposed to the provision of traditional flood protection infrastructure. This approach will support the objectives of WISER and our wider commitment to enhance the environment and improve biodiversity, supported by our customers.

#### Increased security at our sites

43. To make our treatment works more secure and meet new regulatory requirements and guidance under the SEMD regulations, we will invest £1.65m in new physical security measures and alternative water provision. This will involve replacing some doors, kiosks, roller shutters and window bar sets, which are not currently to the correct standard. In addition, fencing will be replaced with the new, enhanced standard of security-rated fencing as appropriate. This will ensure drinking water supplies are protected from third parties aiming to cause damage and disruption to our critical public service.

#### **Smart water production sites**

44. We invest £0.46m to extend our smart technology coverage across our water production assets so we can monitor our entire production and supply process. We will roll out the 'Aquasuite OPIR' tool that accurately predicts demand within a supply zone and uses these predictions to ensure abstraction, pumping, reservoirs and valves are optimised to meet demand. We will also install next generation sensors across our treatment works and pumping stations to continually monitor the health of our critical assets to reduce plant failures and make sure our maintenance and investment regime is as efficient as possible.

#### Providing reliable water supplies through a resilient network

- 45. A reliable, continuous supply of water is a priority for our customers. They have just over a 1% chance of having their water supply interrupted for more than three hours, making us one of the best performing companies in the industry 70% better than the industry average. Our customers have told us reducing supply interruptions further is less of a priority when compared to other areas such as leakage, which reflects our strong performance in this area.
- 46. 91% of supply interruptions lasting longer than three hours are due to burst mains, the rest are due to over-running planned works. The rate of mains bursts across our supply area is also well below the industry average, but we see increases during periods of prolonged dry weather.
- 47. Our long-term ambition is to halve the number of mains bursts and eliminate supply interruptions lasting longer than three hours, so customers receive an even more reliable service. Over the next five years we will continue to make steady progress in both areas by replacing our oldest mains that are more likely to burst and using our smart network to help us respond more rapidly when bursts occur. We will also use new technology that will transform how we target investment in our underground pipe network. Details of the enhancement expenditure required can be found in Appendix SES008: Enhanced Leakage and Network Resilience.

#### **Enhancing our smart network**

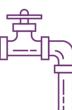
48. In 2022, we became the first company to install smart technology throughout our supply network which is alerting us more quickly to problems so we can respond and fix them more quickly. To date, detection time of larger burst mains and leaks has reduced by 80%, from 15 hours to 3 hours, helping to reduce the length of time customers are without water. For small leaks we've reduced our detection time by around 20% so far and over AMP8 we aim to halve the average leak run time from 2020 levels. We'll do this by investing £1.1m to install more smart sensors so we can monitor our network even more closely and pinpoint the location of bursts and leaks more accurately. This will mean in the future, we can respond even quicker and reduce the risk of supply interruptions further still.

#### **Embedding our DMA Asset Health initiative**

- 49. In another first for the UK water industry, we have implemented technology that undertakes non-destructive, in-situ testing of our metal infrastructure to assess the residual thickness and therefore indicative condition and remaining useful life. Between 2025 and 2030 we will complete the DMA Asset Health assessment across our entire network, giving us a full picture of the condition and performance of our water mains. We will then conduct acoustic condition assessments of 10% of our asset base, which will provide ground-breaking insights into the rate of deterioration.
- 50. This investment is critical to our future performance as it will enable us to optimise pressure within our water mains and target our maintenance and mains replacement programme at those pipes most likely to burst and leak. We have decided not to increase the rate of water main renewal, beyond our base programme, between 2025 and 2030 to keep bills affordable for customers. However, from 2030 our intelligence-led approach to targeting investment will ensure we deliver the best value mains replacement programme for customers, helping to further reduce supply interruptions, bursts and leaks.

#### Minimising leakage

51. Leakage follows high-quality water supply as our customers' second highest priority. Despite our consistently strong performance in meeting our leakage targets\_our



customers consider current levels of leakage unacceptable and a sign of lack of investment, inefficiency and low resilience. They expect us to go further and faster to reduce leaks with 75% of customers choosing additional investment to exceed the Government's leakage target of 50% reduction by 2050 (from 2019/20 levels). We will meet the expectations of our customers and achieve a 50% leakage reduction by 2041 and 62% reduction by 2050.

- 52. Our long-term leakage strategy includes four main components:
  - Active leakage control (ALC) which is activity to find and fix leaks informed by our smart network;
  - Pressure optimisation informed by our DMA Asset Health initiative;
  - Customer side leakage reduction enabled by smart meters; and
  - Mains replacement informed by our DMA Asset Health initiative.
- 53. Between 2025 and 2030, we will reduce leakage by 26.6% in the most cost-efficient way possible, so we balance improving performance with keeping bills affordable. This means we will maximise the savings we can make through ALC, pressure optimisation and customer-side leak detection and defer increasing the rate of water mains replacement until 2030, as it is a more expensive yet more sustainable method of reducing leaks. The enhancement expenditure we are seeking to further reduce leakage is detailed in Appendix SES008: Enhanced Leakage and Network Resilience.

#### **Active leakage control**

54. ALC will deliver one million litres per day of leakage savings – around a 4.5% reduction in leakage between 2025 and 2030. Delivering this is primarily funded through our base expenditure but we require a further £1m enhancement expenditure to increase our ALC capacity. We have a strong track record, having consistently met our leakage target over the last 20 years, even when faced with challenging weather events. Our ALC contract is industry leading and continues to be the only working model in the UK where our contractors are paid only for real volumetric reductions in leakage, enabled by our enhanced network data.

#### **Pressure management activity**

55. We will use our DMA Asset Health initiative to identify where pressure optimisation will have the most benefit and deliver best value. With just under half of our supply network already appraised and pressure optimisation already in place, our aim is to have our entire network optimised by 2030. £2m of enhancement expenditure is required to deliver a further 2 million litres per day of leakage reduction. We have based our target on our experience in AMP7, where over the first three years of the AMP we have already reduced leakage by an estimated 1.5 million litres of water per day through pressure optimisation.

#### **Customer-side leakage**

- 56. Customer-side leakage (CSL) accounts for at least 30% of total leakage, with recent studies indicating it could be up to 50% of leakage in some areas. Historically, our ability to detect CSL has been limited to ALC activity or information fed back from periodic meter reading. More recently, increased metering has begun to make it easier and smart meters, which provide near real-time data, will significantly improve our ability to detect leaks on customers' supply pipes more quickly and efficiently.
- 57. We anticipate faster detection through smart meters will yield an initial reduction in leakage by at least 0.5 Ml/d in AMP8 with further savings expected when our seven-year roll out programme is complete in 2032. This is a conservative estimate based on an assumption that 7% of properties will be found to have leaks when the meter is installed.

- and then a 5% re-occurring breakout rate each year following the installation. Knowing about leaks in near real-time will help us confirm them quicker and work with our customers to get them fixed.
- 58. £0.5m of enhancement funding will enable us to deliver a 10-fold increase in CSL activity. We will support our customers through the process of leak localisation and repair by guiding and signposting them to their insurers and third-party contractors to make the repairs. The funding will also enable the establishment of a legal compliance function and processes to ensure all known leaks are repaired in a timely manner.

## D. Reduce your water footprint and charge a fair, affordable price

- 59. We will transform our relationship with our customers, so we build trust and empower them to take control of their water usage and deliver a high-quality service that is valued. Enabled by enhanced data and digital channels we will move from being a silent service to one that understands our customers and proactively meets their needs. We will help them to find and fix leaks and water wastage, so they don't pay for water they are not using and make water efficiency easier for all.
- 60. This transformation will improve the service we provide and make it fully accessible, offering extra support to those with additional needs. Critically we will go further to help those customers struggling to pay so everyone can afford their water bill. We will drive up satisfaction with all aspects of our service and enhance how we communicate with our customers and work with our partners in the community to deliver better outcomes for all our shared customers.

#### Reducing household water consumption

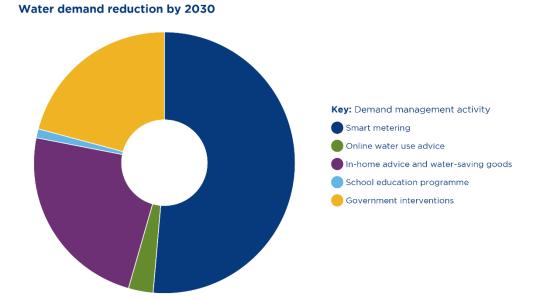
- 61. Reducing household consumption, or per capita consumption (PCC) as it is referred to, is a critical part of our long-term plan to secure our water resources, alongside reducing leaks. As described in Chapter 3: Our track record, the Covid pandemic has increased PCC to a higher level than previously projected, with the impact being particularly pronounced in the South East's commuter belt we supply.
- 62. PCC in our area is 155 litres per person per day.<sup>3</sup> By 2025, at least 85% of our customers will have a water meter and we will have trialled and installed smart meters at some properties. We forecast at this point, average consumption will have fallen to around 144 litres per person. Our long-term target is to reduce PCC to 110 litres per person per day, in line with the Government's Environmental Improvement Plan (EIP).<sup>4</sup> This means by 2030, we will need to reduce PCC by 11%, to 132.6 litres per person per day.
- 63. Like leakage, our PCC reduction strategy includes a mix of interventions. The figure below shows the relative contribution of the different interventions to PCC reduction in 2030 and 2050. Underpinning our strategy is the use of enhanced technology and data that will enable us to transform how we engage with our customers to help them waste less of the water they pay for through leaks and poor plumbing and enable them to become more efficient in how they use what they need.



<sup>&</sup>lt;sup>3</sup> Three year rolling average. PCC in 2022/23 was 150.8 l/hd/d

<sup>&</sup>lt;sup>4</sup> Defra Environmental Improvement Plan, 2023

Figure 3: Activities contributing to water demand reductions by 2030



Source: SES Water revised draft WRMP

#### **Smart metering**

- 64. We will provide smart meters to all metered households by 2032, in-line with our revised draft WRMP. The meters will have enhanced technology allowing us to provide our customers with near real-time information through an app so they can monitor and manage their water use.
- 65. We are accelerating the roll-out over seven-years having considered the savings being achieved by other companies already underway with smart metering programmes, and in line with the Government's expectation that water companies accelerate smart meter roll out<sup>5</sup>. We anticipate smart meters installation alone will achieve consumption savings of just over 5Ml/d and enable us to deliver more tailored, targeted and effective advice and support to our customers to drive consumption down further.
- 66. Our enhancement case in Appendix SES009: Smart Water Customer Experience, covers the delivery of the whole smart transformation, enabling us to maximise the savings that can be achieved from smart metering. This includes data management and integration, digital customer interfaces and enhanced customer communication and engagement. It also includes the necessary cyber security protection and open data provision.
- 67. As described in the previous section, smart metering will also support our next phase of leakage reduction through the identification of leaks on customer supply pipes. In addition, it will help to identify where customers are losing water through plumbing losses in their homes, such as leaky loos and dripping taps. This will save 0.5 million litres of water over AMP8.
- 68. We will devise an efficient physical rollout of smart metering based on geography, age and condition of our existing meter stock. The network requirement will be implemented over AMP8 and include master smart asset data management and data integration. The business processes to support billing will have enhanced automation, providing an improved billing and customer experience. Concerns around smart meter availability have

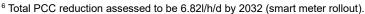
<sup>&</sup>lt;sup>5</sup> Defra, Our integrated plan for delivering clean and plentiful water, April 2023

been largely placated as more companies come to market with viable offerings in what is a buoyant global market for such devices. The UK plans play a small but important part in this. We also remain confident in the labour market, where we continue to attract high-calibre candidates from diverse backgrounds, keen to move into a comparatively stable sector with an employer not tarnished by many of the challenges faced elsewhere in the sector.

- 69. We are proposing a smart metering PCD, comprising two elements of the enhancement costs: the return of a proportion of the fixed costs associated with facilitating smart meter roll-out, and the variable costs of installing and operating smart meters. The total customer protection afforded by this PCD alongside the PCC and Business Use PC ODIs, will equate the £22.3m, equal to the enhancement costs sought and will be subject to cost sharing. Full details are set out in Appendix SES063: Price Control Deliverables and Additional Reporting Metrics.
- 70. We are transforming our customer experience process. From a property's connection to our bill collection, we have mapped each touchpoint with our customers, together with service levels, that will equip us for the ambitious programme of smart metering. This incorporates a customer's journey throughout the meter change, how to use their in-home device, and support when we identify possible leaks or losses beyond the boundary box.
- 71. Our customer interface will provide a 'go-to' for customer information. This will include details on water use, but also link environmental information, affordability support and billing enquiries. Our customer engagement has identified environmental enhancement is a key priority, particularly related to our customers' local catchments. In addition to consumption data, we will provide our customers with 'easy to view' information on how their water use directly influences their immediate environment. This will initiate a particular component of behavioural change and, together with plumbing loss fixes, we anticipate will reduce PCC by 4.9 litres per head per day by 2030.6

#### Household customer home visits

- 72. We will continue to operate several initiatives, that will use the enhanced water consumption data we collect, to better assist households with reducing their consumption. These take the form of:
  - (a) Self-service tools such as the current Get Water Fit platform, that enables customers to review their water use and order equipment for free to install in their home; and
  - **(b)** Household visits that involve in-home visits by qualified plumbers and Community Support Officers, to advise our customers and fit water saving devices.
- 73. We will deliver household interventions through our base expenditure and have forecast savings within our rdWRMP24 of 1.87Ml/d<sup>7</sup> over the course of AMP8. We will start tailoring this as we gather findings from our smart network and meters, so we can help customers who have leaks, plumbing losses or high consumption.
- 74. Our household visits have previously focused on data-led target areas (high consumption), community visits to vulnerable customers, customers on financial tariffs and wider collaboration opportunities (such as with housing authorities). While we become more targeted with these visits, our team of Community Support Officers will continue to be visible in our communities, providing help and advice to our customers.
- 75. Data from smart meters will enable us to monitor customers' water use more accurately and better assess the effectiveness of our household customer visits. Based on



<sup>&</sup>lt;sup>7</sup> Across our Get Water Fit and household visits



our activity records through AMP7, we have assessed household visits and self-service tools will reduce household PCC by 2.47 litres per head per day.

#### **Education programme**

- 76. We have a responsibility to educate future generations about the importance of water and have run a successful education programme for a number of years for primary school children (key stage 2). This was boosted in 2021 when we opened our interactive, state of the art 'Flow Zone' education centre, located at Bough Beech Reservoir. As well as hosting schools at the centre we deliver in-school talks and assemblies. In the last academic year (September 2022 July 2023), the education programme reached 62 schools and nearly 3,800 pupils and teachers.
- 77. Our ambition for the future is broaden the reach of our education programme. We will measure and report on our progress in this area and aim to double the reach of our education programme in the next five years to 8,000 students per year. We have proposed a corresponding metric (see Appendix SES063). To achieve this, we will open up and promote the programme to schools outside of our supply area. We are aware the children who live outside of our supply area today, may be our customers of tomorrow. Moreover, there is a benefit to expanding the reach of our education programme to support the broader objectives of the regional water resources plan, with us playing a larger role to change behaviour and drive down consumption.
- 78. We will expand our programme to secondary schools. There are 43 secondary schools and six 16+ colleges in our supply area, providing an excellent opportunity to reach a new audience. We will deliver content that can be delivered by teachers, across a variety of levels, including GCSE and A Level. We will also extend the reach of our education programme to other groups beyond schools, reaching new audiences via organisations such as Cubs, Brownies, Beavers, and Scouts. We plan to establish a relationship with the Cubs and find a way to support children achieving their 'Global Issues' activity badge, linking using water wisely with a tangible achievement for the children.

#### Water efficient tariffs

79. Smart meters will enable us to develop more progressive tariffs to help incentivise water efficiency and help those struggling to pay. We know from our engagement with customers they are concerned such tariffs could be punitive, but that there is customer appetite for approaches that incentivise water efficiency. We will trial new tariff designs from 2025, working closely with our customers so they accept and support such tariffs. We currently anticipate household tariffs could save one million litres of water per day. However, this area is in its infancy for the water industry so we will work closely with our industry colleagues to design and deliver tariffs that maximise water savings while treating all customers fairly.

#### **Government policy interventions**

- 80. Achieving the Government's per capita consumption target of 110 litres per person per day is dependent on government implementing new water efficient policies that support customers to reduce consumption. WRSE has modelled a range of scenarios and has identified the policies that need to be introduced, which are:
  - Water labelling of all water using products by 2024 (already committed to by Government);
  - Minimum standards for all water using products by 2035; and
  - New building regulations for new homes and retrofits by 2040.





81. When fully implemented, this package of measures is anticipated to save 24 l/p/d and contribute over half of the consumption reduction required to meet the 2050 target. However, as yet the Government has only committed to water labelling. The profile defined within our rdWRMP24 sets out savings of 0.30Ml/d in AMP7, with an increased profile in AMP8 (0.62Ml/d) and AMP9 (1.28Ml/d). Costs are not attributed to this option.

#### Reducing business customers consumption

- 82. Reducing business consumption, while a significantly smaller proportion of overall demand, is an important part of our demand reduction strategy and we welcome the introduction of a government target to reduce business demand and the inclusion of a common performance commitment at PR24. We are committed to working with retail companies and sharing responsibility in this important area.
- 83. We supply around 14,000 non-household (NHH) premises (or 4.5% of our total), who collectively consume around 13% of the water we put into supply. This percentage is lower than many other companies, and the ratio of % NHH premises to % demand clearly shows this is dominated by smaller consumers rather than heavy commercial or industrial businesses. Indeed, approximately 45% of premises supplied use less water than the average measured household in our region. In terms of larger NHH consumers, this is primarily made up of schools (11% over overall NHH demand), Gatwick Airport (9%), healthcare (7%) and sports facilities (7%).
- 84. NHH consumption does not always follow similar trends to household consumption. During the Covid pandemic, demand reduced significantly, falling by more than 50% at the peak, and has remained supressed. A report by Artesia, available in Appendix SES064: Impact of Covid on water consumption, assessed that NHH consumption across the UK has fallen by around 25%. Furthermore, hot summer weather typically has less of an impact on NHH demand although certain sectors such as sports and leisure facilities do increase during these periods.
- 85. The larger impact on demand since 2019/20 is considered to be due to economic impacts of the cost of living crisis. In 2019/20 our NHH demand averaged at 26 Ml/d, while today it averages 22 Ml/d.
- 86. We have operated a successful programme of NHH activities so far in AMP7 and we are currently progressing further projects. This largely includes water efficiency visits to schools and businesses targeting specific sectors to enable a co-ordinated approach across relevant stakeholders and retailers.
- 87. From November 2020 until March 2023, we worked with our retailers and our contractor partner Groundwork to visit 312 schools and conduct water saving visits. These visits were funded by us and were free of charge to the customer. We are in the process of engaging two contractors to expand the service to include other types of NHH customers, initially targeting the highest water users and high footfall premises.
- 88. We will continue to collaborate with retailers in this work, supporting and educating them and the end customer to better understand the benefits from demand reduction. We have refined our assessment of savings attributed to NHH interventions based on our evidence collated during AMP7, increasing projected savings from 0.16 to 0.38Ml/d. With the exception of smart metering, we will deliver non-household interventions through base expenditure.



#### **Working with Gatwick Airport**

We have begun a knowledge exchange with Gatwick Airport our largest NHH customer to support them with delivery of their 'second decade of change' sustainability policy. We are working with them to:

- Use our smart network to help reduce their on-site leak detection, repair times and optimise pressure management across its pipe network;
- Deliver water efficiency and install rainwater harvesting infrastructure to provide an alternative water supply, reducing the demand on potable water supplies; and
- Use a catchment-based approach to manage and reuse runway runoff.

#### **Smart metering**

89. Today, we have around 85% of NHH customers who are metered and on a measured bill. From 2025 we will begin rolling out smart meters to all business customers. As is the case with our household customers, smart meters would enable retailers to develop more progressive tariffs to help incentivise water efficiency. We know from our engagement with customers that they are concerned about such tariffs, which is why we intend to work with retailers to develop potential tariff proposals in AMP8, in turn working closely with NHH customers so they accept and support such tariffs.

#### Reducing water poverty

90. We currently provide almost 20,000 customers with a 50% bill reduction through our Water Support tariff or reductions through our capped tariff Water Sure. This will increase to 25,000 by 2025 and our ambition for 2030 is to maintain this number while working to better target the support we provide. As part of our long-term ambition to eliminate water poverty, we will introduce a new metric that will enable us to measure how many of our customers are in water poverty and monitor our progress, this is explained in Appendix SES063. We describe the financial support we plan to offer to our customers between 2025 and 2030 in Chapter 9 Affordability.

#### **Targeting our financial support**

- 91. In order to provide the right support to those that need it, we will improve our understanding of our customers' individual circumstances. Building on the investment we have made since 2020 in our customer insight and analysis capabilities, we will supplement existing customer data with new third-party data sets. Using data from credit referencing agencies and open banking will give us a richer understanding of a customer's disposable income and how affordable their water bill is. We will use this insight to trial more targeted eligibility criteria and proactively contact customers, enabling us to reach more customers who need extra help but fall outside low-income thresholds.
- 92. In doing this work, we will continue to share our learnings and support sector efforts to drive consistency and fair outcomes for all customers, regardless of where they live. We will continue to work with Thames Water who provide wastewater services to most of our customers to share learning and drive alignment, using our joint billing agreement to make things easier for our shared customers.

#### Increasing awareness of the support we offer

93. The measurement of our performance commitment for 2019 shows nearly 42% of customers say they are aware of our different support schemes which is an increase from





- 36.5% at the start of the AMP. CCW's Water Matters report for 20228 recorded that 35% of customers were aware of our specific social tariff scheme. We will work to increase this measure to more than 50%, which is in line with Wessex Water, the best performer in the sector. This is an ambitious target considering the relative levels of deprivation in our supply area compared with those of other water companies.
- 94. We will achieve this by increasing visibility of our schemes across all our communication channels, including on our envelopes and bills, social and traditional media, and using our enhanced customer data to target the channels that match the habits and preferences of our customers who are most likely to need support. We will also continue to work with partners such as CCW, Water UK and other water companies to share best practice and drive consistent messaging that helps raise customer awareness of the support we offer.
- 95. Building relationships with more local community organisations will help us reach customers we typically struggle to engage with. For example, analysis earlier this year showed uptake of our social tariff in our London local authority areas was consistent with other parts of our supply area despite those areas recording a higher deprivation index. As a result, we have developed a new partnership with the Citizens Advice Bureau in Sutton. We now contribute funding to its debt team, that refers customers directly to us, introduces us to its community partners and supports our team with advice and training. We will use a data-led approach to identifying groups we are not supporting well enough today, such as new refugee populations, and develop a targeted relationship strategy to help them.

#### Making it easier to get help and removing barriers to access

- 96. Whenever a customer talks to us directly about their bill or interacts with an automated process, we will include prompts to help us understand their financial circumstances. Where we identify they may need financial support, we will make it easy for them to get the help they need.
- 97. We know not all customers who need it will ask us for help, which is why we have established partnerships with organisations such as Mount Green and Raven Housing Associations. Using their own income and expenditure assessments, they can refer any eligible clients for our financial support schemes without the need for the customer to complete any additional paperwork or eligibility checks. We will continue to expand the number and reach of these partnerships to remove barriers to access. We also promote awareness of our support schemes through these partner channels so customers can share the information with people they know who may be able to benefit from them.
- 98. Having launched our first reciprocal data share agreement with UK Power Networks in March 2023, we will implement additional data share agreements in the run up to and during AMP8. Through our billing relationship with Thames Water, we already have processes in place to ensure eligible customers receive applicable discounts on both elements of their water bill. By 2024 we will have implemented a data share agreement with Southern Water to cover the remaining 8% of our customers who are supplied by them. We will also introduce data shares with other organisations, including local councils.

#### Support for customers with additional needs

99. Financial challenges are not the only reason our customers need extra support. There are many other factors that influence how customers access and engage with our service and where they may have additional needs. Our Priority Service Register (PSR) holds details of these customers and since 2020 we have increased the number registered from

- 3.0% to 7.2%, meaning we are already hitting our 2025 target. The most common reason for customers to be registered is because of chronic or serious illness. 17% of registered customers are water dependent, while just under 20% are registered with communications needs.
- 100. To identify more customers who require priority services we will build on our first two-way PSR data share with UK Power Networks and are supporting the sector project to expand data sharing between the water and energy sectors. We will expand our data sharing to make it easier for more customers to benefit from the help available, including working with our Local Resilience Forums and charities supporting customers with conditions that make them water dependent, as required under the Security and Emergency Measures Direction. This will help build our understanding of the level and types of needs across our supply area, so we are better able to tailor our services for everyone and understand where we may need to do more.
- 101. When we have an incident, it is particularly important we can supply customers who are water dependent or who may struggle to access a water bottle station with bottled water. Our smart network is helping us to identify the areas affected more quickly so we can identify which customers will need extra support. We will put partnerships in place that enable us to expand the volume of customers we are able to help and increase our flexibility out of normal working hours. We will introduce a new service which will enable customers to tell us when and how often they would like water delivered, so we are able to tailor our service to their requirements.
- 102. Smart meters will remove the need for us to visit customers' homes to take meter readings or to ask them to take a reading themselves, which we know can be stressful. Our dedicated Community Support Officers will offer personal visits to customers with additional needs as meters are installed to offer help and advice on how to reduce their water usage and their bill.
- 103. We will monitor how well our service is performing for customers with additional needs through our regular voice of the customer surveys and feedback loops we use to monitor our day-to-day service, as well as through dedicated surveys after an incident. We will share what we learn and how we will address it with our Customer Scrutiny Panel and Board Customer Committee and publish regular updates so customers can see how we are doing and what we plan to do next. We are applying inclusive design principles across all our core customer journeys and aim to achieve accreditation under the British Standard for Inclusive Service ISO 22458 by 2025.
- 104. We will work with our network of partner organisations supporting customers with extra care needs to review our current communications formats and use of language and imagery to make sure they are accessible and easy to understand for everybody. We will adopt a set of best practice communication guidelines to ensure future communications and channels reflect the necessary standards from the outset.
- 105. We will publish full details of our vulnerability strategy, including clear policies and compensation arrangements for customers whose extra needs have not been met in line with Ofwat guidance by July 2024.

#### Improving customer experience

106. In PR19 we set ourselves the ambitious target of achieving upper quartile performance as measured against the rest of the sector in C-MeX. Although we have fallen short of this target, we have improved our C-MeX performance from 15<sup>th</sup> in 2021/22 to 13<sup>th</sup> in 2022/23 and have stretching plans to improve further by 2025. We have focused on the quality of recruitment, increasing resource levels to improve response times, and have put the right leadership in place at all levels to improve operational delivery. We now





- answer 90% of calls within 30 seconds, with an average wait of less than 20 seconds and respond to written enquires within five working days on average.
- 107. Our customers' expectations are rising and are influenced by their experience of the service they enjoy from companies across a wide range of sectors. Our goal for 2025 to 2030 is to consistently exceed the sector average in C-MeX. This will require us to improve our ranking by at least seven places, which is an ambitious target and a degree of relative improvement only achieved by two companies in AMP7 on a sustained basis at a time when the incentives for every company to improve are increasing.
- 108. We will use our enhanced data and analytic capability to invest in an ongoing programme of customer listening to deepen our understanding of what we must do to improve customer satisfaction. We have also taken into consideration research from external experts such as the Institute of Customer Service and KPMG Nunwood, the work led by CCW and Dragonfish on embedding a customer-centric culture and Ofwat's consultation on the customer focused licence condition in developing our delivery plan.
- 109. Our strategy will deliver four key outcomes our customers prioritise:
  - (a) We get it right first time, every time;
  - (b) We make it easy for all customers to get the service they need;
  - (c) When something goes wrong we act quickly to resolve it; and
  - (d) We listen to our customers and share relevant information with them at all times.

#### We get it right first time, every time

- 110. Customers expect accurate bills. Using our new billing system, we achieved 97% billing accuracy in our annual billing run for unmeasured customers this year while 95.9% of measured bills were based on an actual meter read. We will increase billing accuracy for customers on all types of bill to 99%.
- 111. For bills to be accurate and for us to have a full understanding of the customer account, we will collect and maintain accurate data at every point with data consistency across our systems. We have commenced a full end-to-end review of the customer journey from the moment a new supply is connected, a meter is fitted or a customer moves into a property and will set data accuracy targets for each stage of the journey. We will report on this and set targets at individual and team level to improve performance over time.
- 112. Customers want us to do the job right first time when they contact us. We have increased first contact resolution to 85% since 2019 and will achieve a level of 90% by 2025, maintaining this between 2025 and 2030. This is an ambitious level of performance relative to cross sector benchmarks.
- 113. Customers who are dissatisfied today sometimes tell us they had to contact us more than once or we did not act as one team or know the whole story. Our system and data integration strategy will bring our customer and operational data together in a single customer view, empowering our colleagues to resolve the customer query first time with all the information they need at their fingertips. We will review our operating model and build more integrated teams, so customers do not have to talk to more than one person to get things done.
- 114. We have created reporting that enables us to easily identify when a customer has had to contact us on repeated occasions about the same or similar issues. We hold a weekly meeting with managers from the key operational teams where we review this data and create tailored action plans for our worst served customers.





#### We make it easy for all our customers to get the service they need from us

- 115. Customers want it to be easy to interact with us through a range of contact channels that match their individual preference and are available when they need them. In response to customer feedback they wanted to be able to service their account easily online, we launched our new My Account self-service platform in 2022, which almost 25% of customers have registered for to date. We will use customer feedback to further develop this service and aim to increase the number of customers using it to 70% by 2030. We will also introduce new digital channels such as instant messaging which our customers tell us would be convenient.
- 116. We will use the enhanced data we collect ourselves and from third parties, including open data, to build a better understanding of our customers so we can better predict their needs. Combined with our investment in Next Best Action and artificial intelligence (AI), which will automatically determine the best immediate action available to advisors and customers, we will be able to deliver more personalised solutions without the customer having to initiate contact with us. For example, data from smart meters will enable us to proactively alert customers to high consumption and leaks with information about what to do next. Where we know customers have additional needs, we will tailor our support to them to provide extra care.
- 117. For those that prefer to talk we will retain and upskill our locally based customer care team in Redhill as well as our team of Community Support Officers who visit customers at home and are visible in the community. We will maintain our high level of telephone service and reduce our response time to written enquiries to an average of two working days.

#### When something goes wrong, we act quickly to resolve it for our customers

- 118. When something goes wrong, customers expect us to take ownership of the problem and act promptly to put it right. Our complaints volume per 1,000 households has increased since 2020 and we have not consistently achieved our target of resolving 80% of complaints within five working days. Our target for 2025 and 2030 is to reduce the number of complaints received per 1,000 customers to 0.3 and provide a substantive response to 90% of complaints within two working days.
- 119. Our analysis of complaints today shows that charging queries are the most common reason for customers to complain. Complaints about the use of rateable value for our unmeasured customers have increased significantly as household budgets have come under growing pressure. By the end of AMP7, at least 85% of household customers will have a water meter with newly metered customers able to switch to measured billing from the date of the first meter read. Where we are unable to fit a meter, we will move customers to an Assessed Household Charge, thereby eliminating use of rateable value charging for our customers. Our smart metering programme will give customers more frequent access to their billing data and enable us to support them further in reducing their water charges.
- 120. We have a relatively high volume of complaints about debt recovery action. This volume has been exacerbated by the large volume of debt recovery contact initiated since restarting our debt recovery programme post-covid in autumn 2022. The ratio of complaints to contact is very low at just 0.09%, and we expect complaints in this category to drop as we revert to a more 'business as usual' volume of activity. Our investment in expanding the customer dataset we hold and maintaining data consistency and integrity will enable us to drive improvements to how we recover debt that will further reduce complaints in this category.
- 121. A third common cause for complaint is the quality of information given to customers. Using our root cause analysis, we can identify whether this is driven by individual advisor performance or is a more general issue relating to the clarity of our policies and/or

communications. We are already improving by using the insight from this analysis to review our advisor training programme and deliver individual coaching where appropriate. We are also reviewing policies and communications where customers tell us they are not clear and will involve a range of customers in these reviews to ensure we are listening to their views.

- 122. In AMP8 we will use the Next Best Action and AI capability within our customer relationship management (CRM) systems, combined with our customer golden record delivered through our Smart Water Customer Experience Enhancement Case to make it easier for teams to give the right, contextualised advice to customers at the right time based on an understanding of their individual circumstances.
- 123. When we do receive a complaint, we will achieve speedier resolution by automating case management within our systems and processes with clear ownership for completing the action, internal SLAs and escalation points. We have updated our online complaints form to ask customers to let us know how they would prefer us to reply and what resolution looks like for them and will continuously learn from what they tell us to improve the quality of our response and reduce escalations. We will share this learning with the wider sector and equally look for opportunities to learn from them and other best in class companies for complaint handling.

#### We listen to our customers and share relevant information with them at all times

- 124. Customers expect us to listen and understand the issue from their perspective, keeping them updated so they know what is happening and what they need to do next. They tell us we do this well in some cases but not others. As part of our digital transformation, we will introduce Salesforce Marketing Cloud so we can deliver proactive communications, tailored to customers' circumstances and preferences. Data-driven insights will enable us to keep customers informed and engaged about day-to-day queries as well as during incidents.
- 125. We will continue to listen to our customers and gather insight to inform our business decisions. We will hold a 'Your water, your say' event annually to update our customers on how we are delivering against their priorities and to identify any new concerns. We will also continue to seek new methods for obtaining feedback (like our pop-up station after the Kenley Burst) and validate it using insight from our own data and from our neighbouring water companies.
- 126. Our plan to improve customer experience will be underpinned by our work to embed a customer-centric culture across our whole business, including our strategic delivery partners. We recruit for the right attitude and will invest in developing our colleagues, so they continue to develop their customer service skills throughout their career with us and are equipped to meet our customers' evolving needs. Service is one of our organisational values and our colleagues' behaviours underpin this, and displaying this and our other core values contribute to their end of year performance assessment and management bonuses. One of our non-executive directors attends our quarterly Customer Committee that sets customer strategy and oversee company performance in this area. We share customer insight and examples of both positive and negative feedback at this meeting and run customer immersion sessions for teams across the business so that everyone can build their understanding of our customers and how their role contributes to our customer experience.

#### **Communication and engagement**

127. Transforming customer experience and building trust will require us to boost our current Communications function into one that can build greater brand awareness, enable two-way engagement and influence customer behaviour. This requires us to enhance our existing capability to include a proactive marketing function that will work across the

business, enabling us to reach a wider audience through targeted campaigns and advertising. Achieving many of our performance commitments requires action from our customers and stakeholders so we need to be more visible, both online and in the community, so we can build a deeper connection with our customers and work with them to deliver change.

#### **Marketing**

- 128. Our current communication channels limit our ability to raise brand awareness, drive engagement, and positively influence customer behaviour to meet PCC targets and deliver other outcomes. We currently reach an audience of approximately 20,000 through our website and social media channels and do not have the appropriate marketing consent to engage with our customers beyond legitimate interest, despite having a database of 135k contacts.
- 129. As part of a strategic marketing approach, we will introduce regular, targeted campaigns, designed to raise brand awareness and reach a much broader audience. To positively influence behaviour, our customers need to know who we are, what we do and the benefits we provide so they feel positively about us and the service we provide. Campaign activity will include channels such as digital, print, radio and advertising, as well as outdoor media and boosted social media activity, all designed to have a greater impact and reach than we do currently.
- 130. We will communicate and engage with our customers more meaningfully, using Salesforce Marketing Cloud to add value to our customer relationships beyond the statutory information we must provide. For example, we will be able to share updates on community events, our education programme, and how we're supporting local organisations, allowing us to build a more meaningful relationship with our customers, based on what's of interest to them.
- 131. We will ensure we have the right mix of channels to reach a broader audience, introducing Instagram and TikTok to complement existing social media channels and to ensure we have more opportunity to engage with our future customers and younger bill payers. We will also work with credible and influential third parties who will help us reach a wider audience and increase the impact of our campaigns.
- 132. We will launch a new website, consistent with other touchpoints, that provides a better user experience for our customers. The website will allow customers to manage their account and interactions with us more easily. It will also allow us to communicate more effectively resulting in better brand awareness, a deeper level of trust, and a better understanding of what we are doing to reduce leakage and improve resilience, as well as how we are working with our customers to reduce their own consumption. We will measure customer trust through a new metric explained in Appendix SES063: Price Control Deliverables and Additional Reporting Metrics.

#### Community engagement, events and partnerships

- 133. We will continue to be present in our local communities, providing opportunities for our customers to meet us face-to-face in locations that suit them. In addition, we want to partner with local charities that will help bring our purpose (of improving lives and enhancing nature) to life with meaningful action in our local community.
- 134. We will extend our programme of support to more local community events as part of our broader plan for community engagement and taking our messages to our customers in their daily lives. We will build visibility of our brand, shifting the focus beyond promoting just water efficiency, so our customers can engage with us about a wide variety of topics (e.g. education and water support) and can access more information about the Company. We will identify new event opportunities that diversify the audience we already interact with, training our people to deliver a broader message.

135. We are building direct partnerships with the charitable organisations that we work with so we can ensure they align with our purpose. This will go beyond making an annual donation into more creative and reciprocal ways we can work together. This way we can support a wider range of good causes and have a greater reach within our supply area.

#### Reciprocal community partnership - the Orpheus Centre

We have established a partnership with the Orpheus Centre in Godstone. This local organisation inspires young, disabled students to live more fulfilling and independent lives. We used our Give A Day scheme to provide 60 volunteers who helped to build a water efficient sensory garden within the grounds of the centre. This year, we went a step further and were the headline sponsor for Orphest, a family festival organised by Orpheus to raise awareness and funds. This event provided an opportunity for us to engage directly with our customers and local community, with colleagues volunteering to support a range of activities. Working more closely with this important local charity has also helped us to understand the specific needs of our customers and future customers, helping us to improve the service we offer.

#### Retailers

- 136. Since the NHH market opened the industry has continually adapted and evolved to improve the experience for both the customer and retailer. Despite the retailer owning the customer relationship, we still need to maintain a relationship on various topics with the NHH customers. A lot of what we do impacts on the customer, from supply interruptions to how we are going to manage water efficiency and drive down business demand in our area. We need to engage effectively with these customers and their retailers. Therefore, the same four outcomes apply to our NHH strategy:
  - We get it right first time, every time;
  - We make it easy for all customers to get the service they need;
  - When something goes wrong we act quickly to resolve it; and
  - We listen to our customers and share relevant information with them at all times.
- 137. Providing excellent service to our NHH customers and retailers is as important as providing it to household customers. We will continue to deliver training, so our colleagues understand how the NHH market works and prepare them for the implementation of BR-MeX. We are involved in the industry working group that is supporting the development of BR-MeX and are already implementing changes to our internal systems and processes to improve our NHH customers experience. Like with our household customers, we use feedback calls to gain insight on the service they have received.
- 138. Working collaboratively with retailers is essential to ensure the end customer is getting the best customer experience, this can be achieved by making sure we are dealing with bilateral requests as quickly as we can, and we communicate at each point of the journey. The introduction of R-MeX (the retailer measure of experience) in December 2020 has since enabled us to have direct and honest conversations with our retailers on their experiences and expectations, which has provided valuable feedback we have used to improve the experience of our customers, ranging from financial policies to our ease of contact and website improvements, which has shown in our bettering of position from 14<sup>th</sup> to 9<sup>th</sup> in the latest results.
- 139. The introduction of the BR-MeX performance commitment (a combination of both retailer and business customer measure of experience) will enable us to compare our

performance with others, helping us identify how we can improve our performance further and make targeted improvements to our service.

#### Improving retailer experience

- 140. We will continue to liaise regularly with retailers to review performance, discuss future developments and share insight. A key focus for the future will be our smart metering roll out and how we work together to promote water efficiency and deliver the business demand reductions we are targeting.
- 141. We are currently exploring the process and resource needed to make bilateral requests for C1 & B05 wholesale-led (meter reading standards), this would make us more proactive and help remove responsibility from the retailer and give us more control of our data, enabling us to improve how we manage our portfolio of assets and giving us greater consumption data assurance.
- 142. We fully support continued collaboration with retailers, so we all put the customer at the heart of everything we do, and we advocate that approach in the industry meetings/discussions. To build relationships we will hold retailer days at our Bough Beech Reservoir where we will host and invite retailers to come along for an update on our plans and improvements, while incorporating a tour of the reservoir and our education centre.
- 143. We will review our policies and look to be further align with the Retailer Wholesaler Group (RWG) good practice guides. We recognise retailers don't only deal with us, but other wholesalers too, so aligning and standardising processes where possible is important to them.

#### **Developers**

- 144. Our developer experience strategy outcomes align with those of our household and NHH strategies, and are focused on homeowners and housebuilders, developers, self-lay providers (SLPs) and new appointees (NAVs).
- 145. We have developed an improvement plan using the feedback from developers and the D-MeX verbatim comments, to meet developers' expectations. This will include improving key developer information on our website, refining our application process so it only requires the submission of essential data and integrating the process with our work order system so it's more efficient.
- 146. We will continue to transition to a more proactive communication approach, utilising our existing system capabilities to send SMS notifications at key process stages. Additionally, capturing all inbound communications in a singular CRM source for measuring and actioning efficiently. Ensuring we leverage business learnings from key schemes to embed effective stakeholder engagement.
- 147. As part of our ongoing efforts to reduce the cost of developer quotations we will continue to deliver efficiency savings, remove obstructive upfront fees and promote financial incentive savings. The refinement of our environmental incentive will give developers the greatest level of transparency and opportunity to eligibility. Additionally, the business will benefit from new homes with reduced PCC.
- 148. We are expanding our service benchmark beyond water incumbents to all utility companies. Improving availability of design information and increasing flexibility to meet onsite constraints. Additionally, onsite developers need delivery efficiency. The D-MeX qualitative metrics put our SLAs in excess of new gas and electric installation SLAs, therefore we must exceed our measurements to ensure our assets are laid first and deepest. We will be offering desktop budget quotations in an efficient manner to support market tendering opportunities for developers.



## E. Improve the environment and have a positive impact on our local area

149. The environment is at the heart of our service and improving it is central to our purpose. Our customers expect us to protect the environment and take steps to improve it where we can. We have a strong environmental record, and we know that doing more to enhance our local environment will help us build trust with our customers and stakeholders. This is essential as so much of what we need to deliver over the next five years and beyond is dependent on partnerships and action by others.

#### Reducing our environmental impact

#### **Minimising pollution**

- 150. Minimising pollution risk from our operations is a long-standing priority and we are the only water only company that currently has a commitment in place to achieve no serious pollution incidents (classed as category one and two), which we have achieved for the last 15 years. We will continue to target zero category one and two pollutions and minimise the number of category 3 and 4 pollutions that typically occur when treated water from a burst main enters a watercourse. This means that our performance is closely linked to our work to reduce burst mains and, when they do burst, repair them quickly.
- 151. Our smart network detects bursts and potential pollutions and enables us to pinpoint their location so we can respond and repair them rapidly. It means we can quickly assess whether there is watercourse nearby that is at risk of pollution so we can mitigate any impact. We have worked with the EA to deliver training for our staff in this area and will do more over the coming five years so all are aware of how to manage environmental risks. Our proactive approach is this area is demonstrated by the fact that 95% of all our pollution incidents are self-reported.
- 152. Our ongoing capital maintenance programme on our above-ground asset base, along with the continuing adherence to both our ISO9001 and 14001 accreditations in the operation, maintenance, and project delivery aspects of our work with these assets gives us confidence in our ability to continue to meet this performance commitment.

#### Discharge permit compliance

- 153. Remaining consistently compliant with all our environmental licence conditions including discharge permits is integral to our stewardship of the environment. This area has come into sharp focus due to the performance of wastewater companies, and we will continue to always operate within our licence conditions.
- 154. As with serious pollutions, the ongoing capital maintenance programme on our above-ground asset base, along with the continuing adherence to both our ISO9001 and 14001 accreditations in the operation, maintenance, and project delivery aspects of our work with these assets gives us confidence in our ability to continue to meet this performance commitment, solely though base expenditure.

#### Reducing our carbon footprint

#### Operational greenhouse gas emissions

55. Continuing to reduce our operational GHG emissions remains a priority for us as we progress towards achieving net zero by 2050. Ofwat's revised scope for GHG reduction this will rebase the 89% reduction we have achieved since 2013. We believe our proposed operational GHG reduction metric best illustrates the work we will progress to continue to deliver sustainable GHG reductions (Appendix SES063).

156. We will deliver a range of interventions funded through base expenditure to sustainably reduce our operational GHG emissions under this proposed metric from 14,954 tCO2e in 2021/22 to 8,072 tCO2e in 2029/30, an overall reduction of 46%. These interventions will be aligned with the IEMA GHG reduction hierarchy set out in Ofwat's 2021 positioning paper and summarised in the figure below.

Figure 4: GHG reduction hierarchy and example

	Eliminate	Reduce	Substitute	Compensate
Operational	Demand reduction	Energy efficiency Sustainable sourcing Optimised operations	EVs/Hydrogen Cells Biofuels Renewables sourcing	Carbon sequestration via Biodiversity and WINEP High-quality insetting
Embedded	Nature-based solutions Re-tasking assets	Scope optimisation Sustainable sourcing	Low/no carbon materials	

Source: Adapted from IEMA GHG reduction hierarchy

- 157. We have elected to follow a mid-case GHG reduction trajectory over the next AMP. Specifically, by 2030, we will deliver the following, as set out in Appendix SES035:
  - Leakage, PCC and business use reduction PCs (resulting in 21% contribution to GHG reduction);
  - Invest base expenditure to replace older, less efficient (and end-of-life) assets with more efficient modern equipment (4% net reduction);
  - Continue to move 50% of our fleet to EVs or equivalent low-carbon sources, and reduce our business mileage by 20% (6% reduction);
  - Remove fossil fuels from our heating and resilience operations, replacing with zero carbon electricity or hydrotreated vegetable oils (already tested and proven) (8% reduction).
- 158. The majority of the reduction in emissions comes via ongoing market-based grid and general emissions factors reductions contributing around 61% of the total. Our proposed move to a more sustainable renewable power purchase agreement from 2025 contributes an element of this, along with working with our suppliers to source materials more sustainably and use them more efficiently. Our unique softening operations will continue to contribute a significant proportion of our GHG emissions throughout the period to 2050 (ranging from 60% to 75%). Extensions of this strategy will reduce our operational GHG emissions to 5,051 ktCO2e by 2050, prior to identifying quality in-setting opportunities if necessary to achieve net zero.

#### **Embedded carbon reduction**

- 159. We are currently in the early stages of assessing our embedded carbon reduction strategy and alongside this, the underlying data that supports this. As stated in Chapter 6, it is for this reason that we are not proposing a bespoke PC for embedded GHG reduction. However, we have proposed a metric for this area that is structured on the same basis as our proposed operational GHG emissions metric. This too, is set out in Appendix SES063.
- 160. We will progress with an approach aligned the figure above as the basis for our future capital delivery programmes. We will assess an emissions trajectory for this metric as we improve our embedded carbon data over the coming months. This trajectory will ensure that we are moving towards a position of net zero embedded emissions by 2050, aligning with our operational plan. Central to this work will be the commitment to:

- Seek no- or low-build solutions for every investment need choosing nature-based outcomes where viable;
- Optimising build programmes to minimise the creation of low utilisation of new assets;
- Pursue a procurement and sourcing strategy that places long-term sustainability as a key priority throughout the value chain; and,
- Adopt whole-life carbon costing as a key principle of our future programme management.

#### **Enhancing our local environment**

- 161. We are uniquely positioned to enhance the local environment, which is a key element of our purpose and, alongside this, help customers understand the impacts they too can have on environment health. Our work in this area consists of two inter-linked elements our national environment programme of investigations and schemes (WINEP), and our work to deliver biodiversity net gain both independently and through our WINEP work and partnerships with others.
- 162. Both are multi-AMP programmes of work. Our WINEP involves the delivery of schemes to improve the environment and investigations that could evolve into further environmental schemes in future AMPs. In addition, we will initially nominate large swathes of our own land for biodiversity net gain and add to this in the future as we better understand how our WINEP work can deliver biodiversity improvements alongside its primary drivers, in partnership with other land and water users.
- 163. In the following sections we summarise our work to enhance the environment over the next five years. Further detail is included in Appendix SES010: Enhancement Case -Environmental Improvement.

#### Protecting eel habitats in the River Eden

164. We will install eel screens at our Chiddingstone pumping station that pumps water from the River Eden into Bough Beech reservoir. It is a statutory scheme that is required to comply with environmental regulations and follows the delivery of a similar scheme on the River Wandle in 2018. We have investigated a range of options to ensure we that the screens do not impact on our abstraction or the biodiversity of an existing lagoon. We will install the screens by September 2027 at a cost of £2 million.

#### Tackling invasive non-native species

- 165. Tackling the spread of invasive non-native species (INNS) in our water sources to protect the quality of our local environment is another statutory requirement for AMP8 and involves two areas of work.
- 166. The first is to provide a washdown facility at Bough Beech reservoir where small populations of crassula and zebra mussels have been identified. Bough Beech is home to a sailing and angling club. The £60,000 washdown facility and ancillaries, will be used for all crafts assessing the reservoir, to prevent the spread of INNS via this route and training will be provided to staff and users.
- 167. The second area of work is to deliver a £150,000 surveillance programme across all our sites where water company assets are at risk of INNS. Any control work required within AMP8 will be undertaken as a business-as-usual task.

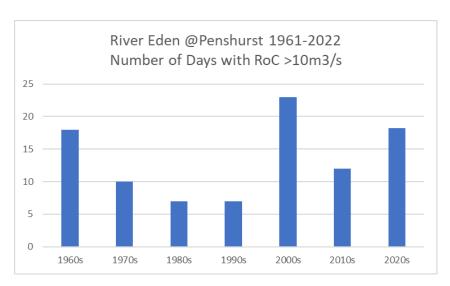
#### **River Eden investigation (non-statutory)**

168. The River Eden catchment covers over 202km<sup>2</sup> in our region (or 25%), making it the second largest river catchment that we operate within. Around 15% of the water we



abstract originates from the River Eden between October and April each year. The challenges in the Eden catchment are significant and varied. It suffers from a range of point and non-point source pollutants, is increasingly 'flashy' presenting flood risk at various points along its route and carries large amounts of sediment from erosion and runoff, further reducing its overall quality. This is demonstrated in the figure below, showing increases in rate of change (RoC) of river levels since the Bough Beech reservoir was constructed and commissioned in the late 1968s.

Figure 6: Historic River Eden rate of change data



Source: National River Flow Archive (nrfh.ceh.ac.uk)

- 169. These challenges pose an ideal opportunity to investigate and ultimately deliver a wide range of interventions aimed at improving the quality and quantity of water to 'slow the flow' in the river. We will work in partnership with other stakeholders in the catchment landowners, local authorities, the rivers and wildlife trusts, other water companies, the EA and Natural England.
- 170. The investigation into and delivery of a wide range of landscape-wide nature-based solutions, working collectively with these partners could give rise to sustained improvement in water quality and quantity through reducing the rate of run off, therefore minimising pollution and maintaining greater flows in the river for longer periods after rainfall. Flood risk could also be mitigated. By working with the partners listed above, we will understand what interventions could be progressed over the short-, medium- and long-term within the Eden catchment.
- 171. One aim of this work is to improve flow in the River Eden so we can abstract sustainably over a longer period each year, thereby removing the potential future requirement to increase the capacity of the Bough Beech reservoir to support water demand in parts of the South East. We will invest £360,000 on this investigational work during AMP8, the output of which will be a range of credible projects, deliverable through the catchment partnership. We also intend to nominate packages of land where these projects are delivered for biodiversity net gain in future AMPs.
- 172. As this work is non-statutory, we have tested customer support for this additional expenditure. 72% were supportive, and it has formally been supported by the EA as part of their letter of support for WINEP at Appendix SES037: WINEP EA Letter.





- 173. The long-term protection and enhancement of nature across our region is a central to our purpose and supports the Government's ambition to halt the decline in biodiversity and promote nature recovery. We can, through delivery of our service, provide lasting benefits to the environment. At PR19 we made a commitment to enhance the management of three of our sites and achieve the Wildlife Trust's Biodiversity Benchmark accreditation, which we have already at achieved at Elmer and Fetcham Springs, making us the first water company to do so.
- 174. From 2025 all water companies will monitor and report of the biodiversity gains they deliver on their own sites and in the catchments where they work in partnership with others. Our focus over the first five years will be on our own sites and we plan to nominate the entirety of four sites for biodiversity improvement work that collectively, amount to 260 ha, or around 80% of the land we own. They are:
  - Fetcham Springs groundwater abstraction site and adjacent treatment works at Elmer
  - Bough Beech estate (storage reservoir and adjacent WTW) and the Chiddingstone pumping station surface water abstraction site.
- 175. Each of these sites are located close to areas of strategic importance from a biodiversity perspective. Our Fetcham sites are located adjacent to the River Mole and the Surrey Hills AONB. Our Bough Beech sites next to the River Eden, within the Kent Downs AONB and adjacent to the High Weald AONB. Connectivity with biodiversity enhancement initiatives within these adjacent land designations presents a real opportunity, including increasing access for the general public, alongside broader educational and amenity benefits.
- 176. Our assessment of the rate of improvement in biodiversity net gain for such sites is long-term and the rate of improvement we project reflects that the sites are already in a strong position and the time it takes for natural improvement to occur. Our target performance level for these sites is to see a biodiversity net gain over AMP8 of around 1.2%. By 2040, we expect this to be around 23%, and by 2050, around 25%.
- 177. The activities focused on biodiversity net gain will be funded through a combination of base and enhancement expenditure. Adoption of new land management approaches will occur through ongoing training of our in-house ground maintenance teams. Enhancement expenditure is sought for the project work required to facilitate longer term biodiversity gain at these sites along with the creation of an in-house, part-time qualified ecologist to oversee the development, delivery and assessment of this work.

#### **Fetcham Springs & Elmer water treatment works**

- 178. Fetcham Springs and Elmer comprise areas of grassland, woodland and reed beds which are assessed as being in varying conditions from good to poor. In 2020, we began devising a masterplan for the development of the Fetcham Springs site which comprised biodiversity management plans and the creation of a community space for use by local groups and ourselves for educational purposes, improvements to the accessibility of the site and the allocation of part of the site for a 2MW solar array, able to support the adjacent treatment works and, at times, parts of the local community.
- 179. Our plan (included at Appendix SES067: Bough Beech and Fetcham Springs Masterplan) was presented to around 100 residents in April 2022. Its contents were welcomed except for the solar array, which attracted significant opposition and has been dropped. The increased focus on biodiversity will require us to undertake a range of tasks at the site during AMP8. This will include:
  - (a) Expanding the land management plan currently adopted across the six ha under the biodiversity benchmark to cover the entire site;

- **(b)** Addressing the nutrient build-up in the on-site mill pond, which gives rise to algal blooms in the summer likely to be via dredging; and
- (c) Managing surface water flows arising from the springs in order to re-naturalise onsite watercourses.
- 180. The Elmer site is simpler, primarily as it comprises a narrower range of habitats, which are currently assessed at a similar status to Fetcham Springs. Management of the site in order to promote biodiversity is largely focused on the continued adoption of the land management plan introduced as part of the benchmark accreditation. With this focus and the delivery of the actions set out above, we predict a net gain in biodiversity at Fetcham Springs and Elmer WTW of 2.7% over AMP8, increasing to 33% by 2040 and 53% by 2050.

#### **Bough Beech Estate (including Chiddingstone PS)**

- 181. The Bough Beech estate is our largest single site, covering around 217 ha, of which 114 ha is designated as the storage reservoir. The adjacent Chiddingstone site covers almost 12 ha and is situated on the River Eden. Habitats on the two sites range from an assessed 'poor' for grasslands to 'good' for woodland and standing water on areas of the sites, through condition assessments undertaken in 2021 and 2023.
- 182. In 2020, we began devising a masterplan for the transformation of the Bough Beech estate. This involved forming an informal partnership with the Commonwork Trust, based at Bore Place, a similar-sized estate next to our land. We have been working with the charity ever since to develop plans for better utilise the estate based on several shared goals between us.
- 183. This plan comprised the progression of biodiversity management plans to the entire site, the creation of a community space for use by local groups and ourselves for educational purposes, improvements to the accessibility of the site and the allocation of part of the reservoir dam wall for a 3MW solar array, able to support the adjacent treatment works and, at times, parts of the local community.
- 184. Our plan (included at Appendix SES067) was shared with local stakeholders, including the local authority, MP and groups currently using the estate for amenity. Its contents were welcomed, and we are updating the plan based on feedback and developing our approach, so we strike the right overall balance for the usage of this estate. The increased focus on biodiversity will require us to undertake a range of tasks at the site during AMP8. This will include:
  - (a) Adopting the land management plan proposed for the 26ha under the proposed biodiversity benchmark to cover the entire site;
  - (b) Improving water quality in the reservoir, which will be facilitated by the progression of our non-statutory WINEP programme; and
  - (c) Managing surface water flows entering the reservoir to the north.
- 185. The Chiddingstone site is less complex, primarily as it comprises a narrower range of habitats. Owing to SEMD requirements, the site is not accessible to the public. Management of the site in order to promote biodiversity is largely focused on the adoption of the land management plan used elsewhere across our sites as part of the benchmark accreditation. With this focus and the delivery of the actions set out above, we predict a net gain in biodiversity at Bough Beech of between 0.5% (in the south of the estate) and 5% (in the north) by 2030, and up to 23% by 2040. At Chiddingstone, net gain is predicted to be 2% by 2030, and up to 36% by 2045.

#### Positive impact on communities



- 186. Our position as a small water company with our head office in the heart of our supply area means that we have a deep understanding of and close links with the communities that we serve. Many of our employees and their families are also our customers and having a positive impact on those around us is personal.
- 187. Aligned to our purpose, our ambition is to provide our local communities with wider benefits from our day-to-day business activities. Using the six capitals model, we are embedding social value within our governance and decision-making processes and through AMP8 we will open up more of our data and insights to help identify new opportunities for social value creation.
- 188. Creating a positive impact on the communities around us is already inherent in the way that we go about many activities today. As we prepare for AMP8, we are committed to understanding and implementing a wider set of metrics that will enable us to better capture and report on our social impact. This includes developing a metric for employability and career aspirations, learning from how others measure progress in this area.

#### Workforce

- 189. Today we provide nearly 350 jobs in our local area, as well as contributing to the employment of many other local residents through our supply chain. Attracting and retaining employees with the right skills is key to our ability to deliver our ambitious plan in a competitive market. To support this, we will develop a more flexible approach to benefits to meet the expectations of our future workforce and introduce more opportunities for flexible working.
- 190. In AMP7 we launched our new Diversity and Inclusion Strategy and evolved our recruitment approach, so we attract and retain talent from a wider range of backgrounds. We are collecting more data and will use the insights it gives us to develop targeted plans to address identified gaps and opportunities. Through our internal communications and learning and development programmes we will continue to emphasise the importance and benefits of being an inclusive employer and educate our teams about the topic.
- 191. As we progress towards becoming a truly smart water company, we will need to support our people with their skills development. We will partner with local educational establishments to promote the skills we need and build our talent pipeline. We are also working with bodies such as the Energy & Utility Skills Steering Group and Green Jobs Delivery Group to identify future skills needs and solutions.

#### Social mobility

- 192. We will expand our schools outreach programme to more schools and colleges in our supply area, with a strong focus on building links with institutions in the London Boroughs which have higher levels of social deprivation than the south of our supply area. Through this programme we attend careers fairs, give talks and will offer workshops on how to prepare for the job market including interview skills and CV writing. We will develop a new metric that will enable us to assess the impact that we have on employability and career aspirations.
- 193. We already run a work experience programme each summer and will introduce a paid summer internship programme for students at the end of their penultimate year, with an opportunity to extend into a post-graduate programme. We will look for opportunities to support ex-offenders through offering them employment opportunities in the local community.