

Regulators' Alliance for Progressing
Infrastructure Development

September 2021



Strategic regional water resource solutions: Standard gate one draft decision for Minworth Effluent Reuse



Contents

| | |
|--|----|
| 1. Introduction | 2 |
| 2. Solution assessment summary | 4 |
| 2.1 Solution progression and funding to gate two | 4 |
| 2.2 Evidence of efficient expenditure | 4 |
| 2.3 Quality of submission | 5 |
| 2.3.1 Solution Design | 5 |
| 2.3.2 Drinking water quality | 7 |
| 2.3.3 Board Statement and assurance | 7 |
| 3. Proposed changes to partner arrangements | 9 |
| 4. Actions and recommendations | 10 |
| 5. Gate two activities | 11 |
| 6. Next steps | 12 |
| Appendix: Actions and recommendations | 13 |

1. Introduction

The purpose of this publication is to set out our draft decision in respect of the Minworth SRO standard gate one assessment by solution sponsors Severn Trent Water and Affinity Water¹ is solution includes two options, the first option is a deployable output of up to 100Mld discharged into the Grand Union Canal for downstream abstraction by Affinity Water, and the second option is a discharge of up to 115Mld into the River Avon to supplement the Severn to Thames Transfer SRO, with the possibility of a combination of both options being explored. concerning the background and context of the Severn Trent Water and Affinity Water solution can be found in the Minworth Effluent Reuse SRO publication document on the Severn Trent Water and [Affinity Water](#)² websites.

This publication should be read in conjunction with the draft decision letters issued to each solution sponsor. Both this document and draft decision letters have been published on our website today.

The assessment process is overseen by RAPID, with input from the partner regulators Ofwat, the Environment Agency and the Drinking Water Inspectorate. The Environment Agency together with Natural England and, where a solution impacts Wales, Natural Resources Wales, have reviewed the environmental sections of the submissions, and provided feedback to RAPID. The Consumer Council for Water provided input to the assessment on customer engagement.

The solution sponsors and other interested parties can now respond to the draft decision. Representations are invited by email to rapid@ofwat.gov.uk and the representation period will close at 5pm on 8 October 2021. All representations will be considered before our final decision is published on 16 November 2021.

We will publish representations on our website at www.ofwat.gov.uk/regulated-companies/rapid, unless you indicate that you would like your representation to remain unpublished. We will also share representations with our partner regulators, Ofwat, the Environment Agency and the Drinking Water Inspectorate and with Natural England and Natural Resources Wales. Information provided as representations, including personal information, may be published or disclosed in accordance with access to information legislation – primarily the Freedom of Information Act 2000 (FoIA), the General Data Protection Regulation 2016, the Data Protection Act 2018, and the Environmental Information Regulations 2004. For further information on how we process personal data please see our [privacy policy](#).

¹ Referred to in PR19 final determination as “Minworth Effluent Reuse Source”

² [Microsoft Word - RAPID - Gate 1 Submission Minworth v7.docx \(amazonaws.com\)](#)

If you would like the information that you provide to be treated as confidential, please be aware that under the FOIA there is a statutory [Code of practice](#) which deals, among other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that we can maintain confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on Ofwat.

We would like to thank Severn Trent Water and Affinity Water for the level of engagement, collaboration, and innovation that they have exhibited during this stage in the gated process.

2. Solution assessment summary

Table 1 Draft decision summary

| Recommendation item | Minworth Effluent Reuse Strategic Resource Option |
|---|---|
| Solution sponsors | Severn Trent Water and Affinity Water |
| Should further funding be allowed for the solution to progress to gate two? | Yes |
| Is there evidence all expenditure is efficient and should be allowed? | Yes |
| Delivery incentive penalty? | No |
| Is there any change to partner arrangements? | No |
| Is there a need for a remediation action plan? | No |

2.1 Solution progression and funding to gate two

The evidence suggests that the solution is a potentially valuable way of supplying water to customers. Based on our assessment of the potential solution costs and benefits we have concluded that the solution should progress through the gated process to gate two, and that further funding be allowed.

This solution's total allowance and gate allowances remain the same as the final determination.

2.2 Evidence of efficient expenditure

The PR19 final determination specified that any expenditure on activities outside the gate activities for the identified solutions (or solutions that transfer in) will be considered as inefficient and be returned to customers. We will consider whether gate activity is efficient by considering the relevance, timeliness, completeness, and quality of the submission which should be supported by benchmarking and assurance.

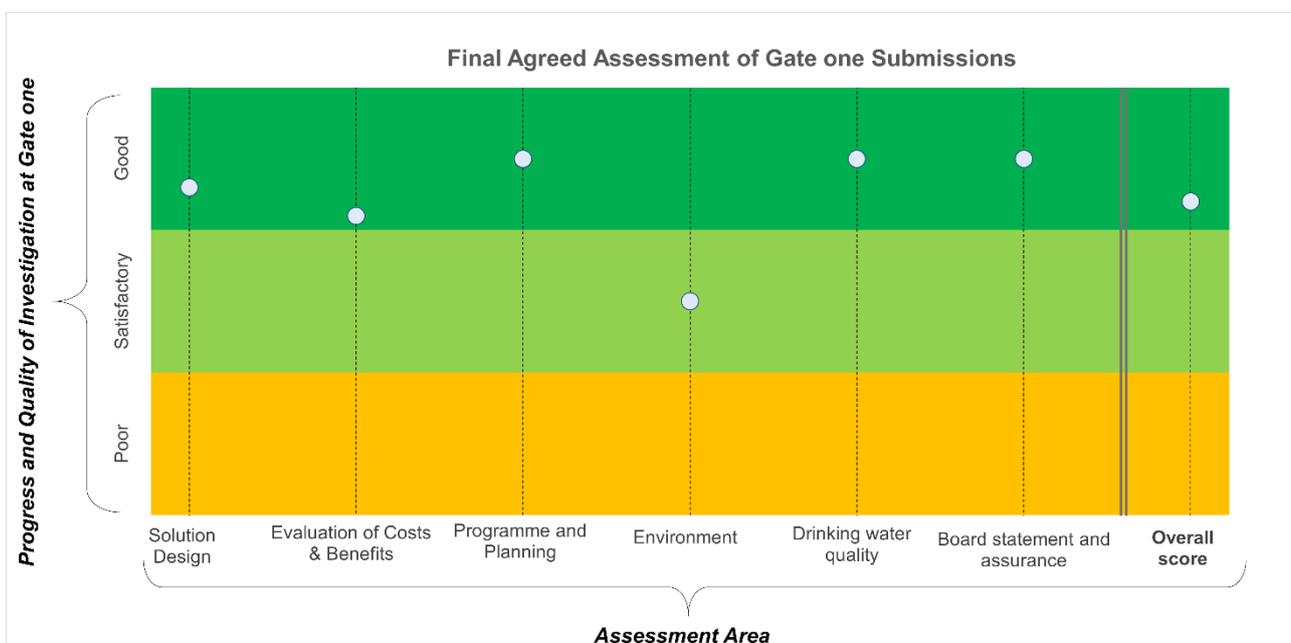
Our assessment of the efficient costs as spent on gate one activities results in an allowance for this solution of £0.74m (of £0.74m claimed). We have made no adjustments to the costs claimed.

2.3 Quality of submission

The aim of the assessment was to determine whether appropriate progress has been made towards delivery of the solution. We recognise at this stage solutions may be at different development points and the assessment takes this into account.

Figure 1 shows our assessment of the work completed on the solution, which was presented in the submission. Our assessment was made against the criteria of robustness, consistency and uncertainty to grade each area of the submission as good, satisfactory or poor in accordance with our guidance published on 22 February 2021. We also assessed the Board assurance provided.

Figure 1 – Submission Assessment



Our overall assessment for the solution submission is that it is good (meets expectations).

2.3.1 Solution Design

Our assessment of the solution design considered the quality of the evidence provided on the initial solution and options; the anticipated operational utilisation of solutions; the interaction of the solution with other proposed water resource solutions and stakeholder and customer engagement. The assessment also considered whether information was provided on the context of the solution's place within company, regional and national plans.

We consider Affinity Water and Severn Trent Water to have provided good evidence of progress in developing the solution design for gate one, although there are some areas where this falls short particularly in relation to assessment of operation, utilisation and

interdependencies. Further work is needed to provide more detail in these areas following regional modelling, including interaction with other SRO and non-SRO options. Further work is required to put the SRO in context with company, regional and national plans and to understand the option's supply capacity and operational utilisation.

2.3.2 Evaluation of Costs & Benefits

Our assessment of the evaluation of costs and benefits considered the quality of the information provided on initial solution costs; the societal, environmental and economic cost and benefits, water resource benefits and wider resilience benefits. The assessment also considered whether evidence was provided on how the solution delivers a best value outcome for customers and the environment.

We consider that the sponsor companies provided good evidence of progress in developing the solution design for gate one, although we expect to see this expanded upon with more detail in the gate two submission.

2.3.3 Programme and Planning

Our assessment of the programme and planning considered whether Severn Trent Water and Affinity Water presented a programme with key milestones and whether its delivery is on track. The assessment also considers the quality of the information provided on risks and issues to solution progression, the procurement and planning route strategy and subsequent gate activities with outcomes, penalty assessment criteria and incentives.

We consider the evidence provided by Affinity Water and Severn Trent Water regarding the programme and planning, risks and issues and the procurement and planning route strategy for Minworth Effluent Reuse SRO to be of good detail and quality for gate one.

2.3.4 Environment

Our assessment of environment considered the initial environmental assessment; the identification of environmental risks and an outline of potential mitigation measures; the detailed programme of work used to address environmental assessment requirements and the initial outline of how the solution will take into account the carbon commitments.

We consider Affinity Water and Severn Trent Water to have provided satisfactory evidence of progress in the environmental assessment, potential mitigations, future work programmes and embodied and operational carbon commitments for gate one. The areas of shortfall identified relate to environmental assessments, the identification of environmental risks and mitigation measures and a lack of detail in the presented programme of work to address environmental assessment requirements including monitoring.

Environmental assessments should be refined for gate two, including a review of scopes and further monitoring. There is a significant amount of further work required to understand the hydrological, water quality and geomorphological dynamics along the River Tame and River Trent and potential impact on ecology and environment is very important. In-combination reviews through statutory assessments will be crucial, as will the impact of any in-combination or interdependencies of other SROs. The sponsor companies must work with the Environment Agency and Natural England to ensure potential risks are addressed through a detailed work program, including scope and mitigation requirements for identified impacts.

The programme of work to deliver at gate two will be challenging.

2.3.2 Drinking water quality

Our assessment of drinking water quality considered drinking water quality and risk assessments; evidence that the solution has been discussed with the drinking water quality team and a plan for future work to develop Drinking Water Safety Plans (DWSPs).

We consider that the information provided in this submission on drinking water quality risks, stakeholder engagement and DWSPs for gate one was good. We expect to see further development of DWSPs, water quality monitoring, including for emerging contaminants, and wider stakeholder engagement with ongoing dialogue with the respective water quality teams in gate two.

2.3.3 Board Statement and assurance

The evidence provided relating to assurance has been assessed as good.

The solution sponsors have provided Board statements that indicate:

- their support of submission recommendations for solution / option progression;
- they are satisfied that progress on the solution is commensurate with the solution being construction ready for 2025-30;
- they are satisfied the work carried out to date is of sufficient scope, detail and quality as would be expected for a large infrastructure project of this nature at this stage; and
- that expenditure has been incurred on activities that are appropriate for gate one and is efficient.

These statements are accompanied by an explanation of the approach to assurance and a description of the evidence and information that the Boards have relied on in giving the statements.

3. Proposed changes to partner arrangements

There are no proposed changes to partner arrangements.

4. Actions and recommendations

Where the submission has not been assessed as ‘meeting expectations’ we have provided feedback on where we will seek remediation of the issues. We have also identified specific steps that solution owners should take in preparing for gate two.

We have categorised these remediation issues and steps into priority actions, actions and recommendations.

Priority actions are those that should have been completed at gate one and must now be addressed on a short timescale in order to make sure the solutions stay on track. They require urgent remediation in full and for this reason directly relate to the assessment of delivery incentives set out in this publication. The response to the priority actions will determine whether a delivery incentive is imposed; and the extent to which the delivery incentives can be mitigated by the solution sponsors. If all priority actions are satisfactorily completed, then the penalty will not be imposed. If one or more of the priority actions are not satisfactorily completed, then the whole of the penalty will be imposed.

We have also identified actions that should be addressed in full in the gate two submission. The response to these actions will influence the assessment of the gate two submission.

Recommendations are issues where additional information or clarification could improve the quality of future submissions.

No priority actions have been identified for Minworth Effluent Reuse SRO, therefore we do not require the solution sponsors to provide us with a remediation action plan. The full list of other actions and recommendations can be found in the appendix.

5. Gate two activities

The solution will continue to be funded to gate two as part of the standard gate track.

For its gate two submission, we expect Severn Trent Water and Affinity Water to complete the activities listed in the [PR19 final determinations: strategic regional water resources solutions appendix](#) as expanded on in its gate one submission.

6. Next steps

Following publication of this gate one draft decision solution sponsors and other interested parties are invited to respond to the draft decision. Representations can be made by email to rapid@ofwat.gov.uk and will close at 5pm on 8 October 2021. All representations will be considered before our final decision is published on 16 November 2021.

Appendix: Actions and recommendations

| Actions – to be addressed in gate two submission | | |
|---|------------------------|--|
| Number | Section | Detail |
| 1 | Solution Design | This needs to be fully developed taking into account all scenarios to establish the best option. A catchment / multi-option overarching report should be provided for gate two to give full confidence that the complex interactions between these options has been fully assessed. We would expect this to be part of the in-combination assessment following the outputs of the regional plans. |
| 2 | Costs and Benefits | Ensure that assessment of costs and benefits take into account any environmental impact as a result of any diversion of effluent discharge. The solution needs to be included in Water Resources East regional plan if being utilised for South Lincolnshire Reservoir and/or Anglian to Affinity Transfer SROs. |
| 3 | Costs and Benefits | Ensure a best value analysis, following relevant guidelines and including environmental/societal/economic costs, is undertaken and presented for all of the options within this SRO. |
| 4 | Environment | The assessment considering the requirements of the Water Environment (Water Framework Directive)(England and Wales) Regulations 2017 needs to consider deterioration (including in-class deterioration) and pathway to Good. The Habitats Regulations Assessment (HRA) needs to consider indirect impacts on the River Mease SAC further and those protected species that may utilise it as functionally linked habitat from the Humber Estuary. |
| Recommendations | | |
| Number | Section | Detail |
| 1 | Stakeholders | Produce a stakeholder engagement plan, including identification of wider / local stakeholders. |
| 2 | Costs and Benefits | Further consider social and amenity value, if this is limited due to type of solution, this can be explained in the submission. |
| 3 | Environment | Site features must be considered even outside of the designated site boundary, particularly in relation to migratory fish species as this functional linkage can extend throughout catchments. |
| 4 | Costs and Benefits | Carry out studies to investigate source option-specific wider resilience opportunities in gate two once regional modelling outputs are complete. |
| 5 | Drinking Water Quality | The risk assessment must consider the impact of influent on the treatment process at Minworth Wastewater Treatment Works (WwTW) and inclusion of a failsafe shut down to ensure that any partial or full treatment failure at Minworth WwTW does not lead to non compliant wastewater being discharged for abstraction/transfer to STT/GUC. |

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| 6 | Drinking Water Quality | Review learning from previous drinking water quality events where changes in water quality has impacted on customer acceptability. |
|---|------------------------------|--|



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