

March 2023

**Strategic regional water
resource solutions:
standard gate two draft decision
for South East Strategic
Reservoir Option**

Ofwat

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1. Introduction

The purpose of this publication is to set out our draft decision about whether the South East Strategic Reservoir Option (SESRO)¹ solution should continue to receive development funding². The solution owners Thames Water and Affinity Water submitted their standard gate two reports on 14 November 2022 for assessment. Further information concerning the background and context of the Thames Water and Affinity Water SESRO can be found in the SESRO publication document on the Affinity Water website³.

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

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, 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 owners 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 6pm on 11 May 2023. All representations will be considered before our final decision is published at 10am on 28 June 2023.

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at www.ofwat.gov.uk/regulated-companies/rapid, unless you indicate that you would like your representation to remain unpublished.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. Subject to the following exceptions, by providing a representation to this consultation you are deemed to consent to its publication.

If you think that any of the information in your response should not be disclosed (for example, because you consider it to be commercially sensitive), an automatic or generalised confidentiality disclaimer will not, of itself, be regarded as sufficient. You should identify specific information and explain in each case why it should not be disclosed (and provide a redacted version of your response), which we will consider when deciding what information to publish. As minimum, we would expect to publish the name of all organisations that provide a written response, even where there are legitimate reasons why the contents of those written responses remain confidential.

¹ Referred to in PR19 final determination as “Abingdon reservoir”

² [PR19 final determinations: Strategic regional water resource solutions appendix](#)

³ [South East Strategic Reservoir](#)

In relation to personal data, you have the right to object to our publication of the personal information that you disclose to us in submitting your response (for example, your name or contact details). If you do not want us to publish specific personal information that would enable you to be identified, our [privacy policy](#) explains the basis on which you can object to its processing and provides further information on how we process personal data.

In addition to our ability to disclose information pursuant to the Water Industry Act 1991, information provided in response to this consultation document, including personal data, may be published or disclosed in accordance with legislation on access to information – primarily the Freedom of Information Act 2000 (FoIA), the Environmental Information Regulations 2004 (EIR) and applicable data protection laws.

Please be aware that, under the FoIA and the EIR, there are statutory Codes of Practice which deal, among other things, with obligations of confidence. If we receive a request for disclosure of information which you have asked us not to disclose, we will take full account of your explanation, but we cannot give an assurance that we can maintain confidentiality in all circumstances.

We would like to thank Thames 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 Summary

2.1 Solution summary

The South East Strategic Reservoir Option (SESRO) is a raw water storage option in the upper catchment of the River Thames. The SESRO project is being developed by Thames Water and Affinity Water with the aim of delivering a new reservoir to store water abstracted during periods of high flow in the River Thames for use during periods of low river flow or high demand for water.

Thames Water and Affinity Water have proposed that the reservoir could be used by the customers of multiple water companies across the South East of England. SESRO could provide a supply of water for Thames Water customers both locally and in London, Affinity Water customers in the Central Region via the Thames to Affinity Transfer and Southern Water customers, through integration with the Thames to Southern Transfer SRO.

The solution partners have identified a chosen site for the reservoir, located south-west of Abingdon. The largest reservoir variant (150 Mm³) has a footprint that covers an area of just under 7 km².

Six variants of the SESRO scheme have been included in the Thames Water's 2024 Water Resource Management Plan (WRMP), consisting of different sizes and configurations. The constrained list of options included in the Water Resources South East (WRSE) regional plan includes:

- 150 cubic megametre (Mm³) capacity reservoir
- 125 Mm³ capacity reservoir
- 100 Mm³ capacity reservoir
- 75 Mm³ capacity reservoir
- 30+100 Mm³ capacity phased reservoir
- 80+42 Mm³ capacity phased reservoir

All six variants of SESRO have been developed as feasible options for the WRSE and WRMP options appraisal process, including an assessment of costs and environmental impact. For the gate two report, Thames Water and Affinity Water have focused the assessment of key issues and constraints for the largest (150 Mm³ storage) option. The solution owners considered that the 150 Mm³ option scheme contains the most constraints and issues to resolve, therefore provided a better 'starting point' for the gate two design process and for the development of the indicative gate two Master Plan.

The WRSE emerging regional plan, published by WRSE in January 2022, selected the 150 Mm³ SESRO to meet demand in the region by 2040. The draft regional plan, published by WRSE in November 2022, selected the 100 Mm³ SESRO to meet demand in the region by 2040. The 100

Mm³ capacity reservoir is also proposed by both solution owners in their draft WRMP24. Assuming the 100 Mm³ option is retained in the final WRSE regional plan and WRMPs, the solution owners are proposing to continue the optimisation and design for SESRO during subsequent design phases.

The single-phase reservoir options could deliver a dry year annual average of between 149 megalitres per day (ML/d) (75 Mm³ option) and 271 ML/d (150 Mm³ option). The 100 Mm³ option has a deployable output of 185 ML/d.

The construction of SESRO is not dependent on any other RAPID solution or other company options. However, for SESRO to deliver a benefit to customers, the water that is released into the River Thames would need to be re-abstracted, treated and distributed, which may require the provision of additional infrastructure. SESRO is therefore linked to other RAPID solutions which will need to be considered in the final scheme design.

The solutions in the RAPID gated programme that are linked to SESRO are:

- The Severn to Thames Transfer (STT)
- The Thames to Southern Transfer (T2ST)
- The Thames to Affinity Transfer (T2AT)

Figure 1. South East Strategic Reservoir Solution Schematic



3. Solution assessment summary

Table 1. Draft decision summary

Recommendation item	South East Strategic Reservoir
Solution owners	Affinity Water Thames Water
Should further funding be allowed for the solution to progress to gate three?	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
Are there priority actions for urgent completion?	No
Are all priority actions and actions from previous gates addressed?	Either complete or partially complete as set out in Section 4.2
Suitable timing for gate three has been proposed	Yes, January 2025 is suitable for gate three.

3.1 Solution progression to standard gate three

The evidence suggests that the solution is a potentially valuable way of supplying water to customers. Based on our assessment of a wide range of areas that could concern the progression of the solution, we have concluded that the solution should progress through the gated process to gate three. Figure 2 below summarises the area of any progression concerns, including indication of the significance. The reasons for this assessment conclusion are set out in table 2 below.

Decisions on funding as a result of this progression decision, are set out in section 3.2.

Figure 2. Assessment of solution's progression concerns

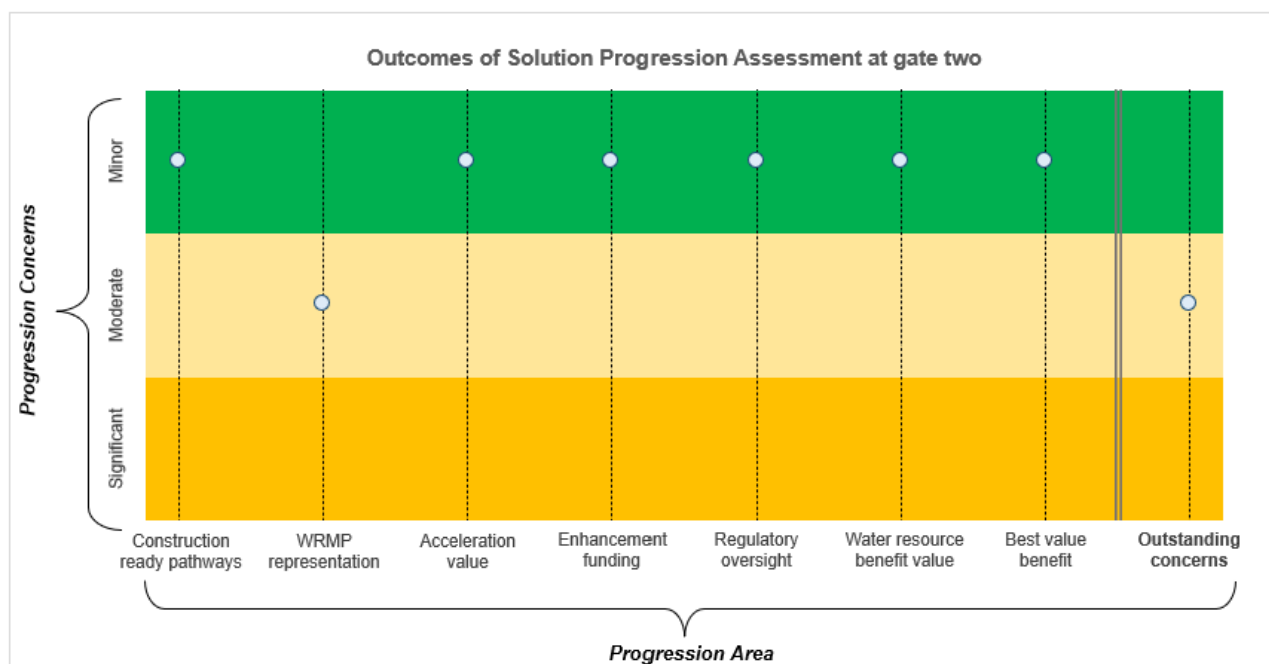


Table 2. Draft decision progression criteria

Progression criteria	South East Strategic Reservoir
Solution owners	Affinity Water Thames Water
Is the solution in a preferred or alternative pathway in relevant regional plan or WRMP (where applicable) to be construction ready by 2030?	Yes, the solution is chosen in Thames Water's and Affinity Water's draft WRMP24, as a solution on its preferred pathway, which is the relevant plan for the standard track. The solution is also in the WRSE draft regional plan. The solution will be construction ready by 2039/40. No further action is required on this progression criteria.
Do regulators have any significant concerns with the solution's inclusion or non-inclusion in a WRMP or regional plan or with any aspects that may impact its selection, to a level that they have (or intend to) represent on it when consulted?	Yes, the regulators have concerns on how the solution is represented, and the information about it, in Thames Water and Affinity Water's draft WRMP24, and WRSE's draft regional plan. <ul style="list-style-type: none"> There is a need to understand the sensitivity of the 100 Mm³ vs 150Mm³ option being selected as the best value option if the size of the Havant Thicket Water recycling option were to reduce (current feasibility and deliverability concerns). There are currently no environmental showstoppers which have been identified for SESRO 150Mm³ at gate two. However, there remains a question over whether the 100Mm³ or 150Mm³ option is most resilient, and whether the 100Mm³ is better environmentally and this needs further justification from the companies. This is also a recommendation in regulator responses to the WRMPs and WRSE regional plan. This progression concern is addressed in section 3.4.3 and gate two actions 2 and 3 in Appendix A of this document.

Is there value in accelerating the solution's development to meet a company's or region's forecast supply deficit?	Yes. A solution is required to address Thames Water and Affinity Water's forecast deficit.
	No further action is required on this progression criteria.
Does the solution need continued enhancement funding for investigations and development to progress?	Yes. Continued funding is required to develop a solution to be delivered in time for the planned construction ready date.
	No further action is required on this progression criteria.
Does the solution need the continued regulatory support and oversight provided by the Ofwat gated process and RAPID?	Yes. The solution will continue to benefit from the regulatory support and oversight provided by being included in the RAPID programme.
	No further action is required on this progression criteria.
Does the solution provide a similar or better cost / water resource benefit ratio compared to other solutions?	Yes, this solution does provide a similar or better cost / water resource benefit ratio compared to other solutions.
	No further action is required on this progression criteria.
Does the solution have the potential to provide similar or better value (environmental, social and economic value – aligned with the Water Resources Planning Guideline) compared to other solutions?	Yes, this solution has the potential to provide similar or better value (environmental, social and economic value – aligned with the Water Resources Planning Guideline) compared to other solutions.
	No further action is required on this progression criteria.
Does a regulator or regulators have outstanding concerns that have not been addressed through the strategic planning processes taking into account proposed mitigation?	Yes. The following outstanding concerns have been identified at this stage: <ul style="list-style-type: none"> • There are some concerns around the methodology for the Landscape and Visual Impact Assessment (LVIA) that need to be agreed with Natural England but we expect this to be resolved in gate three. • The flood risk modelling is still under review and therefore we have not commented on this at this time. We will work with Thames Water to ensure the flood risk model and risk assessment meet requirements. It is possible new environmental impacts will arise as land access is granted and additional monitoring and modelling is undertaken.
	This progression concern is addressed in section 3.4.5 and gate two actions 6 and 7 in Appendix A of this document.

3.2 Solution funding to standard gate three

We are not changing the funding of this solution. This solution's total allowance and gate allowances remain the same as the final determination. The details of this funding decision are set out in Table 3 below, and details on forward programme in section 7.1.

Table 3. South East Strategic Reservoir funding allowances

	Gate one	Gate two	Gate three	Gate four	Total
South East Strategic Reservoir gated allowance	£12.17m	£18.26m	£42.60m	£48.69m	£121.72m
Comment	10% of development allowance calculated as 6% of total solution costs	15% of development allowance calculated as 6% of total solution costs	35% of development allowance calculated as 6% of total solution costs	40% of development allowance calculated as 6% of total solution costs	Total development allowance calculated as 6% of total solution costs

This funding is allowed in accordance with the conditions and requirements as outlined in the [PR19 final determinations: Strategic regional water resources solution appendix](#).

3.3 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.

South East Strategic Reservoir has carried forward £10.65m underspend from gate one, increasing the allowance available to them at gate two to £28.90m.

Our assessment of the efficient costs as spent on standard gate two activities results in an allowance for this solution of £7.23m (of £7.23m claimed). South East Strategic Reservoir has therefore underspent its combined gates one and two allowance by £21.68m and may take this underspend forward to gate three, increasing the allowance available to them at gate three to £64.28m.

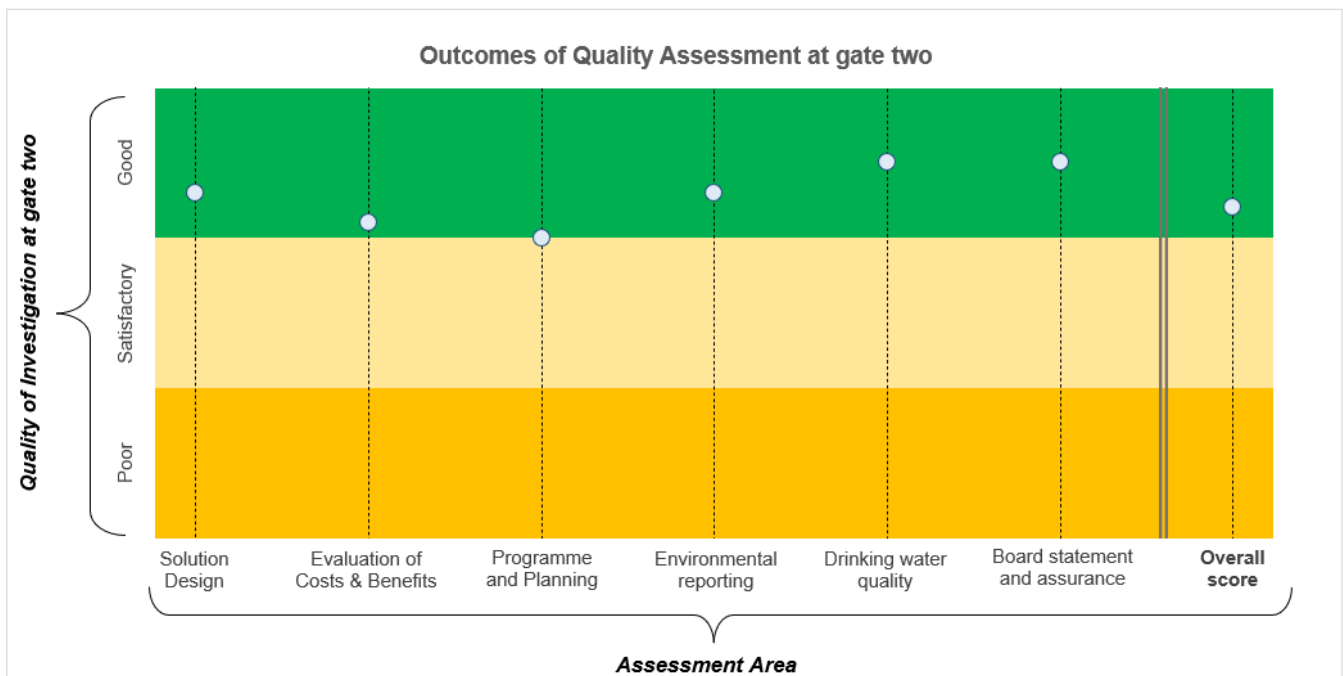
From gate two, we will move to look at the cumulative gate spend against the cumulative total allowance, across all gates consistent with the activities being undertaken. For example, any gate four allowance that is brought forward towards gate three should be for the purpose of early gate four activities. Overspends and underspends are then to be managed through cost sharing between the water company and customers. As the South East Strategic Reservoir is progressing to gate three, this will apply here.

3.4 Quality of solution development and investigation

The aim of the assessment was to determine whether gate two activities have been progressed to the completion and quality expected, for the continued development of the solution.

Figure 3 shows our assessment of the work completed on the solution, which was presented in the gate two 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 the [standard gate two guidance](#), (updated version published on 12 April 2022). We also assessed the Board assurance provided.

Figure 3. Assessment of quality of investigation



Our overall assessment for the solution submission is that it is a good submission that meets expectations of gate two.

We explain our assessment of each individual area, including any shortfalls in expectations, in the sections below. We have not applied any delivery incentive penalties as a result of this assessment of quality, as further detailed in section 4.

3.4.1 Solution Design

Our assessment of the Solution Design considered the quality of the evidence provided on the initial solution and sub-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 Thames Water and Affinity Water to have provided sufficient evidence of progress in developing the solution design for gate two; SESRO solution design meets gate two requirements. Interactions with other solutions is well described.

However, the submission is focused on the 150Mm³ option, despite a 100Mm³ option having been selected through best value planning. The 150Mm³ option is very well developed, with a master plan as well as comprehensive infrastructure requirements. If a 100Mm³ option is taken forward, it will need to be developed to the same standard so that appropriate environmental assessment can be undertaken.

Further recommendations relating to the solution options, utilisation and stakeholder engagement are provided.

3.4.2 Solution costs

Our assessment of the unit costs of delivering the South East Strategic Reservoir Option is that they are reasonable at this stage and cost changes from gate one to gate two have been sufficiently explained and are as a result of detailed development of the solution or changing market conditions. For instance, energy requirements have been more accurately estimated using outputs from the updated deployable output modelling. The assessment also considers the use of the solution as a drought resilience asset, and therefore cost per capacity is often a more appropriate metric than cost per projected utilisation. We will continue to scrutinise cost estimate changes from gate two to gate three.

3.4.3 Evaluation of Costs and Benefits

Our assessment of the evaluation of costs and benefits considered the quality of the information provided on initial solution costs; the social, 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 Thames Water and Affinity Water have fallen short of providing sufficient evidence of evaluating the costs and benefits of the solution to an appropriate standard for gate two. Actions relating to the best value assessment and recommendations relating to best value and water resources assessment are included to improve these areas.

Environmental benefits are well explored and assessed through natural capital and biodiversity net gain and meet expectations. Water resources benefits are described for each

SESRO sub-option, but there are complex conjunctive use benefits across the interlinked solutions. As gate two reports are based on a 150Mm³ option, the companies need to show the resilience of the 100Mm³ option compared to the 150Mm³ option and how the 100Mm³ option performs environmentally against the 150Mm³ option. This is also a recommendation for the WRMP and we expect this to also be picked up through that route.

3.4.4 Programme and Planning

Our assessment of the programme and planning considered whether Thames Water and Affinity Water presented a programme with key milestones and whether its delivery is on track. The assessment also considered 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 Thames Water and Affinity Water regarding the programme and planning and risks and issues for SESRO to be of sufficient detail and quality for gate two. Risks and mitigation descriptions are satisfactory and meet expectations for gate two. There are currently no environmental showstoppers identified that would prevent SESRO from progressing. While the programme and planning score has been marked down as requirements that solution owners were funded to meet have not been met, we have made a decision that there is no longer a need for value for money assessments for RAPID solutions and therefore no associated gate two action is required.

3.4.5 Environment

Our assessment of Environment considered the initial option-level 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 Thames Water and Affinity Water to have provided sufficient evidence of embodied and operational carbon commitments for gate two; the carbon assessment meets expectations.

The environmental assessment completed for SESRO for gate two meets expectations in almost all areas. As most work to date has focused on the 150Mm³ option, many of the assessments will need to be repeated for the smaller option if taken forward, as well as being further refined with additional monitoring and modelling proposed for gate three. The Environment Agency will continue to work with Thames Water to develop and refine the flood risk modelling and LVIA methodology.

3.4.6 Drinking water quality

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

We consider that there is sufficient evidence of progress in the drinking water quality and risk assessment and future work around Drinking Water Safety Plans for gate two. We expect to see further monitoring for emerging contaminants of concern and a programme of work to review risks around reservoir mixing and thermal stratification.

3.4.7 Board Statement and assurance

The evidence provided relating to assurance is satisfactory for this stage of the gated process.

We consider that the boards of Affinity Water and Thames Water have provided a comprehensive assurance statement and have clearly explained the evidence, information and external / internal assurance that it has relied on in giving the statement.

4. Actions and recommendations

Where the submission has not been assessed as ‘meeting expectations’ in the quality assessment, or progression concerns have been raised, 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 standard gate three.

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 two 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.

Actions are those that should be addressed in full in the standard gate three submission. The response to these actions will influence the assessment of the gate three submission.

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

We have also assessed progress on actions and recommendations from gate one.

4.1 Actions and recommendations from gate two assessment

No priority actions have been identified for South East Strategic Reservoir.

Sixteen actions and recommendations have been identified for South East Strategic Reservoir which should be fully addressed at the gate three submission or at an alternative or earlier date where this has been set in Appendix A. Progress against actions will be tracked as part of regular checkpoints the solution holds with us whilst undertaking gate three activities.

The full list of priority actions, actions and recommendations for South East Strategic Reservoir can be found in Appendix A. If solution owners cannot meet action deadlines set, please explain this in the representation.

4.2 Actions and recommendations from gate one assessment

We have assessed whether South East Strategic Reservoir has met actions that were set out as a result of our gate one assessment.

No priority actions were identified for South East Strategic Reservoir.

Nine actions and recommendations were identified for South East Strategic Reservoir which were expected to be fully addressed at the gate two submission.

We have decided that the actions have partially been addressed in the gate two submission. Further detail of our conclusion against each individual action is shown in Appendix B.

Partially complete actions have been linked to gate two recommendations to ensure that these are fully resolved by gate three.

5. Delivery Incentive Penalty

We have not applied delivery incentive penalties to this solution, as a result of the assessment carried out on the gate two submission.

6. Proposed changes to partner arrangements

There are no changes proposed to partner arrangements from gate two.

7. Gate three activities and timing

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

For its gate three submission, we expect Affinity Water and Thames Water to complete the activities listed in [PR19 final determinations: strategic regional water resources solutions appendix](#), as expanded on in section 7 of the solutions gate two submission. Activities are expected to be completed in line with delivery incentives and expectations set out in [RAPID's gate three guidance](#). We also expect the actions listed in appendix A to be addressed.

7.1 Gate three timing

Affinity Water and Thames Water have proposed a date for gate three of January 2025. This is proposed alongside a forward programme of gate four in April 2026, proposed planning application submitted in Autumn 2026, solution construction ready in 2029, and solution operational in 2040.

We agree that the SESRO gate three should be January 2025. This aligns gate three with solutions on a similar programme, and for RAPID to efficiently assess progress of activities, ahead of the solutions proposed planning application

The forward programme proposed by the solution is in line with the principles of RAPID's standard programme. Funding arrangements are set out in section 3.2 of this document.

We have reviewed your forward programme for gate four. Gate four should be scheduled a minimum of a month after the acceptance of planning applications, so suggest gate four should be November 2026.

8. Next steps

Following publication of this standard gate two draft decision solution owners and other interested parties are invited to respond to the draft decision. Representations, including evidence from solution owners that priority actions (identified in the Appendix) have been addressed, can be made by email to rapid@ofwat.gov.uk and will close at 6pm on 11 May 2023.

All representations will be considered before our final decision is published at 10am on 28 June 2023.

Appendix A: Gate two actions and recommendations

Actions – to be addressed in standard gate three submission (except where specific dates apply below)		
Number	Area	Detail
1	Solution Design	Confirm to RAPID that the solution aligns with Affinity Water’s and Thames Water’s Water Resource Management Plans (WRMP) and relevant Regional Plans at the next available regular checkpoint meeting after the publication of the WRMPs and Regional Plans
2	Solution Design	Work with the Environment Agency to develop 100Mm ³ option to the same level as 150Mm ³ option, including environmental assessment, modelling and master planning, to understand the full environmental impact and benefits of the 100Mm ³ option compared to the 150Mm ³ option.
3	Evaluation of Costs & Benefits	Evidence should be provided to RAPID’s satisfaction that 150Mm ³ option does not provide wider drought and South East supply system resilience benefits sufficient to justify the larger scheme compared to the 100 Mm ³ option.
4	Evaluation of Costs & Benefits	Clear and robust best value evidence to RAPID’s satisfaction to be provided in line with WRMP recommendations to demonstrate 100Mm ³ is preferred over 150Mm ³ option. We would welcome confirmation that abstraction reductions at Farmoor and wider environmental destination scenarios for the southeast can still be supported with a smaller scheme being progressed.
5	Programme and Planning	More information to RAPID’s satisfaction to be provided on wider key risks and mitigations around construction and procurement.
6	Environment	Review and update landscape and visual impact assessment (LVIA) methodology with Natural England
7	Environment	Work with the Environment Agency flood risk team to refine and develop flood risk modelling.
Recommendations		
Number	Area	Detail
1	Solution Design	Update the solution design to reflect the preferred solution size.
2	Solution Design	Thames to Southern transfer water treatment works is currently located on the SESRO site but has not yet been incorporated into the solution design. It should be clarified which of the SESRO options could accommodate both the reservoir and the Thames to Southern water treatment works within the site space
3	Solution Design	Remove utilisation uncertainty or assumptions where required by gate three.

4	Solution Design	Local customer and stakeholder engagement to continue to gate three.
5	Solution Design	Engagement with Historic England to be completed by gate three.
6	Evaluation of Costs & Benefits	Show directly how the benefits of the solution align with Ofwat's Public Value Principles.
7	Evaluation of Costs & Benefits	SESRO-STT-T2ST conjunctive use benefit of 19Ml/d plus any other in-combination deployable output impacts with other solutions including with T2AT should be accounted for within the regional modelling. Present water resources benefit under dry year critical periods in addition to dry year annual average under 1 in 500 drought resilience and climate change.
8	Evaluation of Costs & Benefits	Use environmental assessments to inform new masterplan development of the 100 Mm ³ option to inform environmental risks and opportunities.
9	Drinking water quality	Provide a programme of work to clarify the review and mitigation of the reservoir's mixing and thermal stratification risks.

Appendix B: Gate one actions and recommendations

Actions – addressed in standard gate two submission			
Number	Area	Detail	RAPID assessment outcome
1	Solution Design	Determine deployable output (DO) benefits when the South East Strategic Reservoir Option-Severn to Thames Transfer (SESRO-STT) joint options are combined with Thames to Southern transfer (T2ST) rather than supplying London only, as outlined in response to query SER004.	Complete – Link to gate two recommendation 7.
2	Solution Design	Provide a detailed assessment of interdependencies and in-combination impacts with other strategic resource solutions and other options following the outputs of Water Resources South East (WRSE) modelling.	Partially complete - Link to gate two recommendation 7.
3	Environment	Provide a landscape and visual impact assessment, the project team should engage with and work with the AONB Board on this.	Complete
Recommendations			
Number	Area	Detail	RAPID assessment outcome
1	Solution Design	Continue investigation of combined SESRO-STT modelling to determine any additional DO benefits and report on findings.	Complete – Link to gate two recommendation 7.
2	Costs and Benefits	Revise environmental findings of WRSE in-combination assessment.	Complete
3	Costs and Benefits	Further investigate the DO conjunctive use benefits associated with the Thames to Affinity transfer (T2AT).	Complete – Link to gate two recommendation 7.
4	Costs and Benefits	Further consider the conjunctive use benefits of the SESRO and STT solutions, we note that SESRO and STT submissions at gate one differ on this point.	Complete – Link to gate two recommendation 7.
5	Environment	Provide further detail on how the Thames Water Asset Planning System aligns with or diverges from other standard carbon footprinting methods as this would improve the consistency of the submission.	Complete

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