Draft Water Resources Management Plan

Appendix F: Decision Making





Appendix F: Decision Making

In accordance with the Water Resources Planning Guidelines (2021) published jointly by Natural Resources Wales (NRW), the Environment Agency and Ofwat, a best value plan is one that "considers factors alongside economic cost and seeks to achieve an outcome that increases the overall benefit to customers, the wider environment and overall society. A best value plan should be efficient and affordable to deliver, legally compliant and account for the range of legislation that applies to it."

We have built this dWRMP using a collaborative approach, working through the regulatory requirements and then speaking regularly to our stakeholders to understand their views on the direction we have taken. We have considered several different elements including:

- What has changed since WRMP19?
- How can we work with other sectors and other water companies to better understand their water needs?
- What is our resilience to extreme drought and how would climate change affect our supplies under an extreme drought scenario?
- What are the lasting impacts of covid-19 on our customer working patterns?
- How can we improve biodiversity in our area and enhance ecosystems?
- How can we create the best value plan for our customers?
- What can we do to support people on private water supplies in our area during times of drought or prolonged dry weather?

We discuss these questions in detail within the main plan document.

Following the guidance from NRW and Welsh Government, we have considered a range of drought resilience, climate change and future demand scenarios. **Even under the most extreme scenarios we expect to maintain a supply surplus over the next 60 years.** This means that the amount of water available under the most severe climate change (using RCP8.5 projections) and drought scenarios will be more than enough to meet the future demand needs of the changing population and growing industry in our area.

Taking into consideration the feedback we have received from our customers and stakeholders we have developed a long term strategy which focuses on reducing leakage, increasing the use of demand management and protecting our sustainable sources of supply. We do not foresee any need to develop new sources of water supply.

In this appendix we describe our decision-making approach and how a wide range of considerations have informed the recommendations made in our draft water resources management plan (dWRMP). We have considered how our activities could deliver wider value to the environment and society. Our environmental destination programme described within our dWRMP (details can be found in the main plan document and appendix D) will be a key feature of our PR24 business plan.

Whilst we have developed a list of potential supply options (detail can be found in Appendix E), we have no supply demand deficit to resolve and therefore no driver for supply-side investment. We have screened them out of our plan based on cost and the lack of water resources need.

Hafren Dyfrdwy is a core member of Water Resources West and the objectives, decision making criteria and recommendations made in our draft WRMP are consistent with those in the wider regional plan.

F1 Understanding the problem

One of the main changes in the Water Resources Planning Guidelines (2021) from previous WRMPs is that water companies need to look at the wider benefits of their plans beyond economic costs, moving away from least cost, no regrets planning to creating plans that deliver the best value to their customers. It is important that we adopt the appropriate but proportionate decision-making approach to develop a best value plan for customers. More complex approaches are needed depending on the significance of the risk to the balance of water supply versus demand in the context of future pressures from growth, climate change and environmental issues.

We used the UKWIR problem characterisation approach to determine the size and complexity of the supply demand situation. The assessment for our 2019 WRMP showed that we were in surplus across the company and had a Low complexity problem to solve.

Our assessment in January 2022 for the pre-consultation phase considered a range of different scenarios to understand how different potential "futures" could affect our supply and demand. It indicated that, under the most extreme climate change impacted drought scenario, there was a reasonable risk that our Wrexham water resource zone (WRZ) could go into deficit by 2085. This increased our problem characterisation size to a 'small deficit' with complexity remaining at Low.

Further modelling, improved data, and clarification of how the Dee General Direction rules should be applied under climate change scenarios, indicated that Wrexham WRZ would in fact remain in surplus, thus reducing the complexity back to Low (see Figure F1.1).



Figure F1.1: Our problem characterisation

However, given the expected change in problem characterisation at pre-consultation, we committed to develop an enhanced decision support capability to help us develop a best value plan. Our change in decision making approach is shown in Figure F1.2. Our new decision support tool, WiSDM (Water Infrastructure and Supply Demand Model), allows us to test a wide range of future scenarios (including Ofwat common reference scenarios) and to have an integrated investment plan informed by a system wide view of water supply, resilience and leakage reduction.



Figure F1.2: Assessment of investment modelling approaches

We believe that an enhanced investment modelling capability is essential over the longer term and we therefore continued its development despite further analysis confirming that all zones are in surplus. A description of the WiSDM model is given in section F6.

Using the WiSDM model allows us to assess the costs and benefits of different levels of mains renewal, leakage reduction, demand management and metering alongside options to increase supply capability.

WiSDM can be used to assess and trade off supply and demand options using a multi-criteria assessment. However, without a supply demand deficit to close, supply options were not loaded into the system and its primary usage for this dWRMP was to find the optimum glidepath to a 50% leakage reduction.

F2 Developing a best value plan

Our decision-making approach follows the principles set out in the Water Resources Management Planning Guidelines (2021). Figure F2.1 illustrates how the stages of our approach correspond to those principles.



Figure F2.1: How Hafren Dyfrdwy's best value decision approach map to Chapters 9 & 10 of the Water Resources Management Plan guidelines (2021)

The WiSDM modelling approach applies the principles of the UKWIR/Environment Agency report titled 'Economics of Balancing Supply and Demand (EBSD)'. However, we have gone beyond a simple financial cost / benefit appraisal, and have explicitly considered customers' priorities, stakeholders' views, UK and Welsh Government policies and strategies, our environmental obligations and the environmental and social impacts of our future activities.

F3 Our Planning Objectives

The fundamental objective of our draft WRMP is to ensure a secure supply of wholesome drinking water for our customers while protecting and enhancing the water environment.

While our plan is driven by this fundamental objective, the decisions on how to achieve it are shaped by a range of regulatory policies as well as customers' and stakeholders' priorities.

In 2022, we reached an important milestone and issued our first-ever Strategic Direction Statement (SDS). The SDS outlines our long-term ambitions and the key trends, challenges and opportunities we face as a business over the next 30 years. Our SDS was produced in conjunction with our dWRMP, our PR24 business. Together these three documents will shape our Long Term Delivery Strategy (LTDS).

We have explored the key issues in Wales, including the climate and nature emergencies, as well as the impacts of changes in the economy and wider demographic shifts. These changes will create a range of longer-term challenges to our business as we continue to provide an affordable, resilient service in the face of a challenging economic backdrop and the future investment required to support our response to climate change. We have also considered the key regulatory and policy drivers in Wales, such as the Water Strategy for Wales (2015), Well-being of Future Generations (Wales) Act (2015) and the Environment (Wales) Act (2016). We have identified seven future priorities. These are our long-term ambitions and key strategic aims for our business over the next 30 years.

- 1) Ensure we can continue to be able to source and deliver water to guarantee future supplies.
- 2) Help our customers to be more water conscious to ensure water is used more wisely.
- 3) Deliver a high quality, affordable service and support our most vulnerable customers.
- 4) Improve the resilience of our network to lower the risk of flooding and pollution.
- 5) Adopt more sustainable practices to protect and enhance our environment.
- 6) Work with communities to make a positive social difference.
- 7) Invest in our high performing culture to maintain a safe, inclusive and fair workplace.

In delivering these priorities, we recognise the importance of working collaboratively across the sector and with our communities, regulators and policy-makers across Wales to bring our plans to life. Our future priorities are set not just so that we can be a leading, community focused water and wastewater company, but also so we can make a meaningful and positive environmental and social difference, not only to our area, but to Wales as a whole.

Our priorities are also aligned with the priorities of the Water Resources West regional planning group (which are shown in Figure 3.1) and have shaped the options and decisions that we have taken to inform this draft WRMP.



Figure F3.1: Water Resources West's water resources planning objectives

In conjunction with the other companies in Water Resources West we developed metrics which we would have used to assess the supply side options in our dWRMP if we had a water resources shortfall. These metrics are shown in Figure F3.2. As our WRZs are in surplus throughout the 60 year planning period we did not progress the supply side options beyond an initial screening process. Details of this can be found in appendix E.



Figure F3.2: Definition of metrics and initial weightings

F4 Policy considerations

Our plan is shaped by the many policies and ambitions set by the UK and Welsh Governments and regulators for long term water resources planning. Below is a description of how these different policies and ambitions have been taken into account and how they affect our assessment of the best value plan.

F4.1 Leakage

The Welsh Government's Water Strategy for Wales (2015) states "We expect companies to maintain leakage at the point where the environment, economic and social cost of reducing leakage is less or equal to the cost of getting water from other sources. Water companies should have a strategic approach to managing leakage to inform the long term leakage forecasts in their water resources management plans. We expect water companies to forecast a reduction in total leakage during the planning period."

Ofwat has given a clear message to the water industry that they expect to see ambitious and innovative leakage reduction programmes in the next water company business plans in PR24, with the expectation that companies meet the Water UK commitment to reduce leakage by a minimum of 50% by 2050 from 2017/18 levels with ambitious milestones to achieve this. This policy led leakage reduction goes beyond the traditional sustainable economic level of leakage and instead sets a performance target that we need to deliver in the most efficient way.

Our dWRMP24 approach prioritises leakage reduction over supply investment and is built around a plan to achieve a 50% leakage reduction by 2050, from 2019/20 levels. By using 2019/20 as a starting point instead of 2017/18, we are setting ourselves a more challenging target as it includes two further years of leakage reductions and it also means we are using a year where the company was fully aligned to the new boundary set up (Hafren Dyfrdwy was launched in 2018).

We explored options to reduce leakage by 5%, 10% and 15% by 2030 and concluded that a 10% reduction (shown in Figure F3.1) by 2030 strikes the right balance as:

- All our water resources zones are projected to remain in supply / demand balance surplus during the current water resources planning horizon, even without further leakage reduction;
- Our customers want us to be ambitious and reduce leakage;
- A 10% reduction is stretching and beyond the sustainable economic level of leakage and we have other areas of risk that require investment.



Figure F3.1: Leakage reduction options to a 50% target by 2050

We have reduced leakage by 6%, or 1 MI/d, between 2019 and 2022 putting us in a good place to achieve our 15% leakage reduction target by 2025.

Our current strategy to drive down leakage through a mix of active leakage control, pressure management and mains renewal will continue. Initial modelling indicates that activity levels will need to step up as we drive leakage lower. We have included costs in our plan to achieve the 10% reduction by 2030.

In the longer term we will need to find a better way to reduce leakage on our customer owned service pipes (which currently accounts for 25% of total leakage). This may mean implementation of smart meters and transfer of ownership so that we may efficiently renew them. We will set out these options as part of our PR24 adaptive planning process.

Table F3.1 shows our proposed glidepath to achieve the 50% leakage reduction from 2019/20 levels by 2050.

% leakage reduction in each 5-year period				
2030	2035	2040	2045	2050
10%	12%	12%	14%	15%

Table F3.1: Leakage Targets

F4.2 Metering and demand management

Our baseline demand forecast takes account of demographic, social, economic, lifestyle, environmental and such other factors as are likely to influence how household and non-household consumption patterns may change over the next 60 years. Our plan provides a reliable, and wholesome, supply of water to our current and future customers. We forecast a long term declining demand for water across our water resource zones driven by falling population predicted in our area over the next 60 years.

Although the Welsh Government has not mandated a per capita consumption target, we intend to adopt a long term target of 118 litres per head per day (I/h/day) as part of our preferred plan. We believe that this is the practical limit that we can achieve working with our customers without universal metering and the use of widespread smart meters and incentivised tariffs. Welsh Government support on water labelling and Building Standards is a pre-requisite to achieve our 118 I/h/day target and is assumed to be in place by 2030.

Our plan focusses on demand management measures including education and enhanced water efficiency support. As all of our water resource zones are in surplus, we lack the necessary authority to install smart meters for all our customers. Our customer research shows limited appetite from our customers to universal metering. We may undertake a limited trial of smart meter technology between 2025 to 2030 to understand what smart metering technology would work in upland rural areas with limited access to power and telecoms. We will continue to offer our customers the free meter option and will continue with our maintenance strategy to replace old or broken meters reactively.

During 2020 to 2025 we plan to deliver a 4.2% reduction in per capita consumption in our region. In 2025 to 2030 and beyond we will implement a baseline water efficiency programme in line with our understanding of the requirements of our statutory water efficiency duty (Section 93A of the Water Industry Act) and the expectations of NRW and Welsh Government.

In developing our plan, we have considered the relevant guidance and sought out evidence from other groups, for example:

- Waterwise Evidence Base Reports
- Data and insight from our own water efficiency programmes, also utilising data from Severn Trent
- Evidence from other water industry reports and from third parties.

F4.3 Drought measures

Our Drought Plan includes details of the actions we would take under severe drought conditions. We would not apply for any drought permits, however, we would implement demand side options including temporary use bans (our level of service is no more than one temporary use ban in every 40 years) and in a severe drought we may seek to implement a Drought Order to impose further demand restrictions to non-household customers.

For this latest draft WRMP, the Environment Agency has asked water companies to make plans to reduce the use of such drought measures in the future while Natural Resources Wales has instructed companies not to include any drought measures if they would have significant environmental impacts.

Our draft WRMP assessment has shown that we are able to achieve 1 in 500-year drought resilience from the start of the planning period without imposing any drought measures.

F5 The Environment and Society

Over the last few years, there has been significant investment by the water industry and other large scale abstractors to protect and improve the environment by reducing the adverse impact of abstractions on ecosystems. However, our ecosystems are facing unprecedented challenges, which is reflected in the declaration of a climate emergency by Welsh Government in addition to the over-whelming evidence for biodiversity decline in Wales. By setting an ambitious strategy for ecosystem resilience we can work with regulators to help enhance biodiversity through our water resources activities whilst ensuring a plentiful supply to customers – this strategy is also known as our environmental destination.

NRW have set out a clear set of principles that we will follow in developing our environmental destination:

- o Deliver demonstrable benefit for the environment;
- o Consider the appropriate scale (spatial and temporal);
- o Consider multiple benefits;
- o Use a collaborative approach;
- o Take account of all relevant evidence, and;
- o Adaptive management.

As well as taking into consideration the NRW principles outlined above, our approach to environmental destination has taken into account a range of guidance and policy documents including:

- Water Resources Planning Guideline 2024 Supplementary Guidance: Environment and Society in decision-making (Wales)
- State of Natural Resources Report (SoNaRR) 2020, which assesses Wales' progress against the four aims of the sustainable management of natural resources (SMNR) approach.
- Welsh Report of the UK Climate Change Risk Assessment (CCRA3) to understand the potential future challenges due to changes in the climate.
- Natural Resources Policy (NRP), published by Welsh Government in 2017 setting out how they will improve the way that Wales's natural resources are managed.
- Mid Wales Area Statement
- North East Wales Area Statement

Details of our environmental destination approach can be found in Appendix D and in the main plan document. Other considerations are described in the sections that follow.

F5.1 Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act (2015) includes a goal to develop a more resilient Wales, which is described as: "a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change)."

The Wellbeing Act embeds the sustainable development principle into Welsh legislation. Sustainable development is defined as the process of improving the economic, social, environmental and cultural wellbeing of Wales.

Public Service Boards (PSBs) were introduced following publication of the Wellbeing of Future Generations (Wales) Act 2015 to improve joint working across all public services in each local authority area in Wales. Each PSB must carry out a well-being assessment and publish an annual local well-being plan, setting out how they will meet their responsibilities under the Act. Hafren Dyfrdwy's supply area intersects with 4 PSBs – Powys, Wrexham, Flintshire and Denbighshire.

As part of the 2022 Well-being assessments, PSBs have sought the opinion of citizens within their area as to how the well-being can be improved. These are set out against the 4 pillars of well-being – environment, culture, society and economy. While each area has unique demographics and associated sets of issues, there are some common themes that we can engage with under each pillar. In appendix D we explore in detail these themes and the things we as a company are planning to do through our environmental destination and/or as part of our wider PR24 business plan.

F5.2 Environment (Wales) Act 2016

The Environment (Wales) Act 2016 aims to provide significant economic, social and environmental benefits for Wales. It was carefully designed to support and complement the Welsh Government's work to help secure long-term well-being, so that current and future generations benefit from a prosperous economy, a healthy and resilient environment and vibrant, cohesive communities.

Section 6 of the Act introduced a duty on public authorities operating in Wales to "**maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions**". The definition of public authority in this instance includes water and wastewater companies.

In December 2019, we submitted our first report and set out our compliance in terms with meeting the objectives of the Nature Recovery Action Plan (NRAP) for Wales. We will continue to use these objectives as the basis of our compliance with the duty and for future reporting.

Our environmental destination proposals seek to support delivery of Section 6 of the Act. We also have activities planned to maintain and enhance species and habitats included in the Section 7 biodiversity lists, for example, we are planning to continue with biodiversity improvement works at Lake Vyrnwy, focusing on habitat restoration for key section 7 species such as the curlew and black grouse.

Our environmental destination is aligned to the principles of Sustainable Management of Natural Resources (SMNR). We have taken into consideration the priorities set out in the Natural Resources Policy (NRP) and the Area Statements for North East and Mid Wales. Details of our environmental destination approach can be found in appendix D.

F5.3 Strategic Environmental Assessment

A Strategic Environmental Assessment (SEA) is required under Statutory Instrument 2004 No.1633 - The Environmental Assessment of Plans and Programmes Regulations 2004. Throughout the course of the development of the plan, policy or programme, the aim of SEA is to identify the potential impact of options proposed in the plan in terms of their environmental, economic and social effects. The first stage of the SEA is a screening exercise to determine whether it is required.

We have consulted with NRW throughout the development of our dWRMP. When we completed the baseline forecast, which showed that we had no supply demand deficits under the most severe climate change scenarios, NRW confirmed that we would not be required to carry out a Strategic Environmental Assessment on our dWRMP as it involves no supply schemes, only demand management options.

F5.4 Habitats Regulation Assessment

Water Resources Management Plans are subject to the provisions of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'). The water company has a statutory duty to prepare a WRMP and is therefore the Competent Authority for the HRA of that plan.

We have consulted with NRW throughout the development of our dWRMP. When we completed the baseline forecast, which showed that we had no supply demand deficits under the most severe climate change scenarios, NRW confirmed that we would not be required to carry out a Habitats Regulation Assessment on our dWRMP as it involves no supply schemes, only demand management options.

F5.5 Carbon reduction

It is our ambition to be a net-zero company by 2030. We are committed to our Triple Carbon Pledge, which we made in 2019:

- To achieve net zero operational carbon emissions by 2030
- To generate or procure 100% renewable electricity
- To move our fleet to 100% electric vehicles by 2030.

The plans laid out in our dWRMP will support us in our goal of being net zero by 2030, and thus supporting the Welsh Government's greenhouse gas reduction targets. By reducing leakage and bringing using more demand management techniques to help our customers reduce their water usage we would need to treat less water to put into supply, reducing our energy use for pumping and through the treatment process. This would help us to further reduce our carbon footprint.

F5.6 Drought Resilience

Water companies are required to assess the resilience of their systems to droughts with a return period of 1 in 200-years and 1 in 500-years. The new 1 in 500-year resilience standard makes sure that exceptional demand restrictions, such as Emergency Drought Orders are not required due to drought more than once every 500 years on average (i.e. systems should be resilient with a 0.2% annual chance of stand pipes and rota cut implementation). As a minimum, the requirement for Wales is for companies to assess a design drought – the worst drought on record for their company area. As the River Dee catchment crosses into both England and Wales and is used as a source of water by English and Welsh companies, modelling work was carried out by NRW with a view to identify how the operation of the River Dee system may have to change to accommodate the 1 in 500-year drought resilience target and adapt to the likely impacts of UKCP18 climate change projections. The steer from the Dee Consultative Committee, as with previous climate change work, was also to identify the likely scale of change to available supply whist retaining the current levels of service. Outputs from the UKCP18 RCM RCP 8.5 for the 2060-2079 period were used to estimate the likely impact on the Dee

System. Modelling has shown that climate change is likely to cause a reduction in the amount of water available for abstraction from the Dee System. NRW has stated that water companies should plan for a net reduction in their River Dee allocations of 26% by the 2070s, based on historic inflow data with UKCP18 RCM outputs applied. This reduction in net River Dee allocations is not driven by the new 1 in 500-year resilience target, instead failures were caused by the existing Dee levels of service criteria (which have shorter return periods). NRW has proposed to investigate this before the next round of planning as the model outputs showed the need to review control rule curves and target storage reserves.

Our assessment of our groundwater sources has also shown that they are resilient to 1 in 500 year drought events, combined with the impact of climate change.

Companies in Wales do not have a time constraint on when 1 in 500-year drought resilience is achieved, however, for companies in England the guidance states that the expected level of 1 in 500-year resilience should be achieved as early as possible, or by 2039 at the latest. Our assessments show that the water resources system in the Wrexham and Llandinam and Llanwrin WRZs meet the 1 in 500-year resilience from the start of the planning period (from 2025). Our level of service for temporary use bans and non-essential use bans (1 in 40 years) is also maintained.

Saltney and Llanfyllin are supplied by bulk imports from our neighbour, Severn Trent. Severn Trent has factored this bulk supply agreement into their dWRMP assessment. We have therefore assumed that the water we import will continue to be available.

F6 WiSDM modelling – deriving the least cost plan

The WiSDM model is the decision support tool that we use to produce and optimised best value plan. It is made up of six linked sub-models:

- · Supply demand Headroom
- · Leakage
- · Mains repair
- · Interruptions
- · Discolouration
- · Ancillaries

The relationships between each of these sub-models are illustrated in Figure F6.1.



Note: The supply demand headroom entered into the WiSDM model is positive and, without a deficit to fill, the model does not need to select any supply or demand options. The model has been used to assess the

levels of mains renewal and leakage activity.

The three primary sub-models that predict the performance of our infrastructure asset base; mains repairs, minor repairs and leakage. The mains repairs model calls upon the asset attributes such as pipe material, diameter, year laid and soil setting to generate a mains deterioration profile. The repairs, by failure mode and diameter are then input to two secondary sub-models; unplanned customer interruptions and discolouration.

The minor repairs model is driven by the weighted average mains age of each WRZ, a component of which is also used by the discolouration model (valve repairs).

The leakage sub-model contains the base level of leakage by WRZ and applies a leakage deterioration component (NRR), which is driven by the weighted average age and material type of mains in the WRZ. Future demand and headroom requirements are also taken into consideration in the model.

The integrated model calculates, for each water resource zone, the least cost mix of capital and operational interventions needed to prevent mains bursts and leakage increasing due to network deterioration, as well as to achieve the desired service targets for burst frequency, supply interruptions and leakage as well as maintaining target headroom throughout the planning horizon. Social and environmental costs of the chosen interventions are also included in the least cost calculation resulting in a plan that is holistically least cost.

F7 Ensuring multiple benefits in the best value plan

For this dWRMP, we believe that the least cost, no regrets plan is the best value for our customers. Keeping bills as low as we can will ease pressure on our customers, particularly during the continuing cost of living crisis. We do not need water resource schemes and have concentrated our efforts on leakage reduction, innovation in water efficiency and demand management activities and our environmental destination programme. There are multiple benefits of these activities, as shown in Table F7.1.





Additionally we also considered additional criteria, shown in Table F7.2.

Table	7.2:	Other	considerations	in forming	our	best	value	plan
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Best Value Plan measure	How we have taken account of this in our plan
	We have worked with the other companies in Water Resources West to
Regional plans and the	align methodologies and approaches, share data and knowledge and to
needs of other sectors	better understand the needs of our neighbouring water companies and
	other sectors.
Customer preferences	Our customer research has influenced the pace at which we are planning
	to reduce leakage.
	Welsh Government policy guidance is to "consider local multi-sector
	needs, such as agriculture and businesses, that have ability to switch to
	mains during peak demand periods and how you could support, where
	reasonably practicable, private water supplies during times of peak
	demand such as dry weather/ freeze thaw". We proposed three
How to support people on private water supplies	different levels of investment to our customer research panel. They
	expressed a preference towards the low to medium investment option.
	Our emerging investment plan will cover:
	\cdot Support with alternative supplies – tanks, access to raw water reservoirs
	for the farming community to use in times of agricultural drought
	 More granular analysis using GIS to identify possible low-cost
	opportunities to connect domestic private supplies from 2030 onwards.

Best Value Plan measure	How we have taken account of this in our plan
Non-drought resilience such as water supply system resilience	To fully understand the resilience of our system we are undertaking a source to tap resilience assessment against all hazards. This integrated approach to assessing the inherent risks and sustainability of our systems and approach to managing our water services, will consider Well-being of Future Generation benefits as well as addressing these specific hazards. The outcome of this analysis will inform our PR24 business plan.