

# DRAINAGE & WASTEWATER MANAGEMENT PLANNING

DWMP28 STRATEGIC  
CONTEXT JAN 2026



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# EXECUTIVE SUMMARY

The Drainage and Wastewater Management Plan (DWMP) is our long-term plan for managing and improving wastewater systems so they can meet today’s needs and future challenges. In this plan, we explain the bigger picture, the future trends we’re planning for, and how we aim to deliver the best value for both our customers and the environment.

Because you use our wastewater services every day, your input matters. We want you to help shape these plans so they’re practical, meaningful, and guide the right decisions for the future.

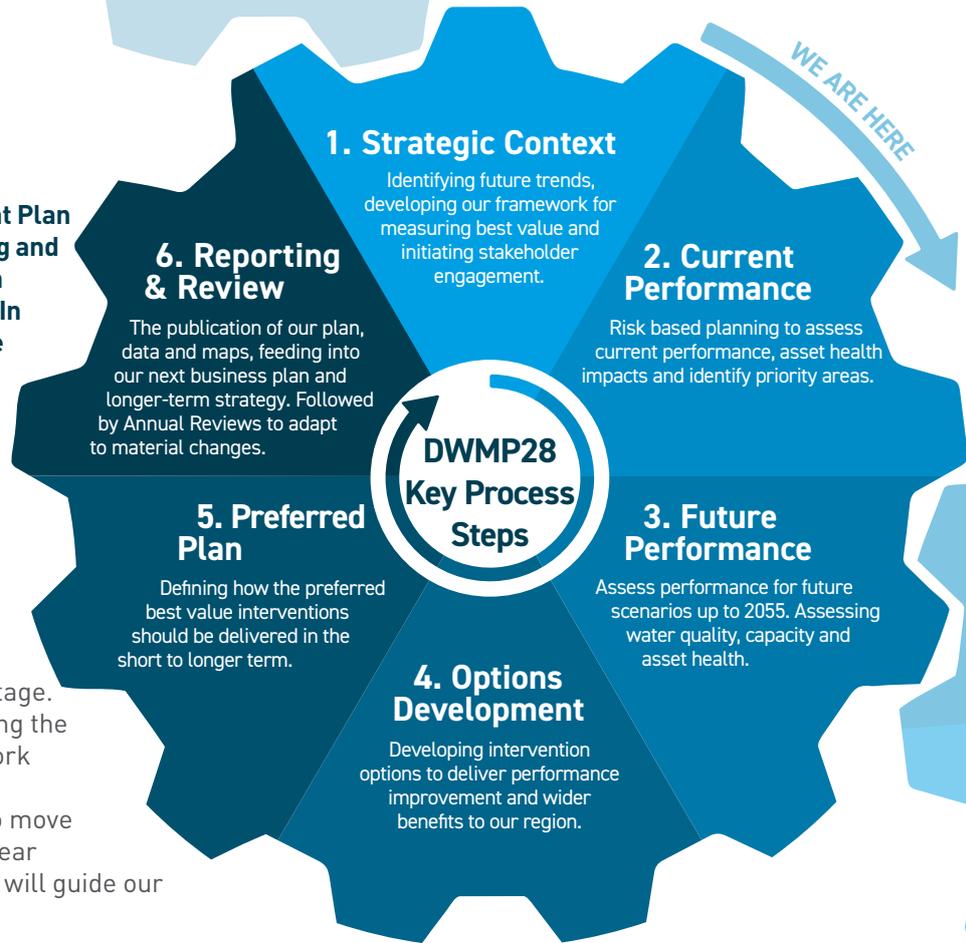
Our DWMP is built around six key stages. Right now, we’re at the Strategic Context stage. This means we’re focusing on understanding the future trends likely to affect how our network performs and how we will make sure any investment decisions are the best value. To move through the six stages, we’re developing clear approaches and assessment methods that will guide our decisions and help us plan effectively.

We’re looking ahead to understand the challenges we face now and in the future, so we can make the right investments that benefit both our customers and the environment. This plan helps us prepare for pressures such as population growth, climate change, aging infrastructure, and the need to stay resilient against external factors.

**We want to set out the investment needed to:**

- Reduce the risk of flooding and pollution
- Improve and protect water quality
- Keep our system strong and reliable for the next 25 years

Below, we’ve highlighted the key parts of the DWMP that



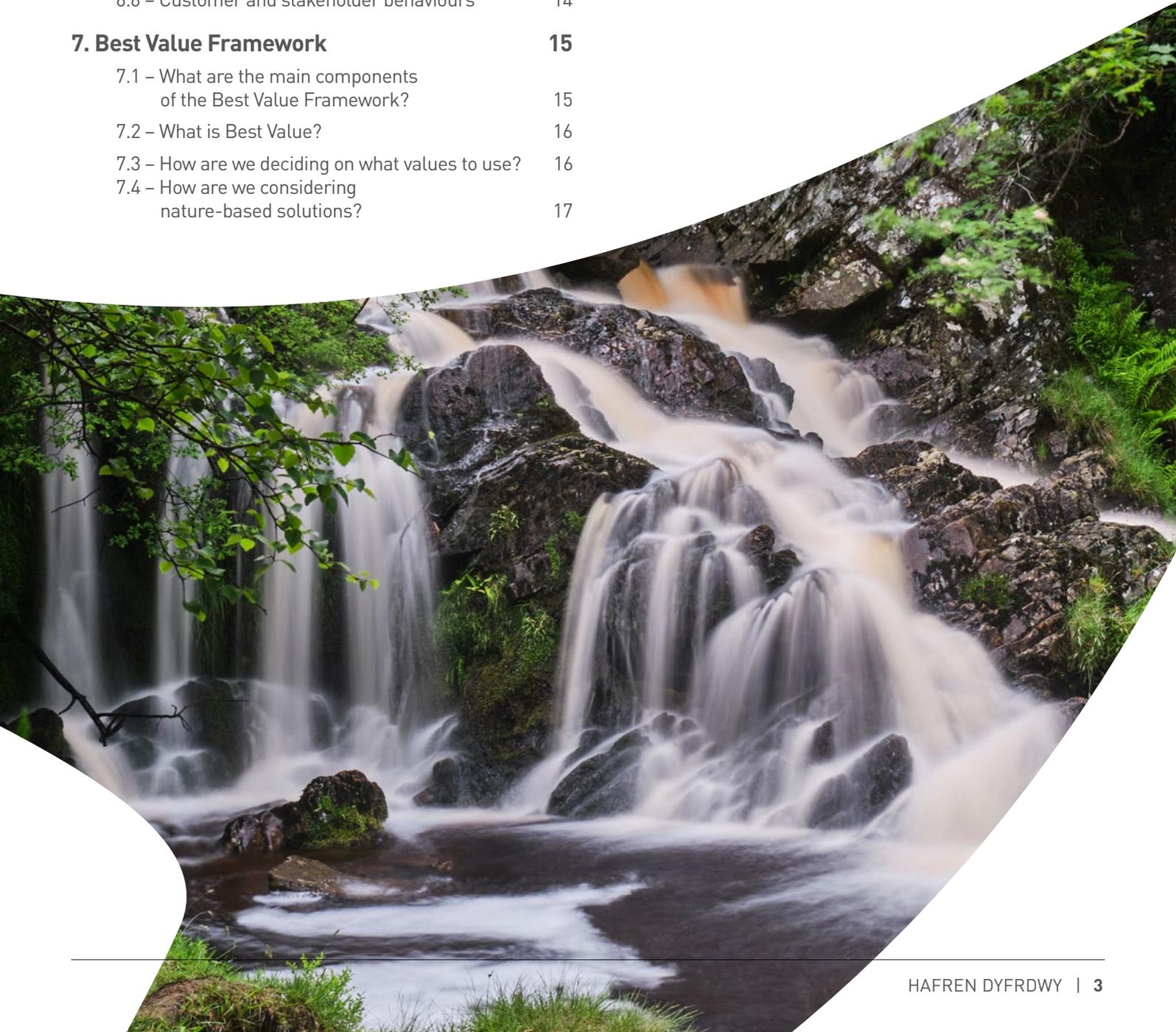
matter most to our customers and stakeholders, and how they align with wider priorities.

We want to make the DWMP valuable and easy to use for everyone we work with and serve. To achieve this, we’ll share our DWMP outputs through an interactive, accessible website and mapping portal. This document explains what we’ll be assessing and how we’ll measure and value benefits. Our aim is to give you confidence that the DWMP will provide a robust evidence base to help plan for the future of our wastewater system.

If you have any questions or queries about our Strategic Context or DWMP, please email us at [DWMP@hdcymru.co.uk](mailto:DWMP@hdcymru.co.uk)

<p><b>GROWTH PLANNING</b> </p> <p>Know where the wastewater system has capacity to handle new developments.</p>	<p><b>FLOOD MITIGATION</b> </p> <p>Understand where joint flooding issues are and how we can work together to create solutions.</p>	<p><b>CLIMATE CHANGE</b> </p> <p>Mitigating climate change by managing rainwater sustainably using nature-based solutions.</p>	<p><b>ALIGNING RESOURCES</b> </p> <p>Delivering more for less by aligning resources, to reduce costs and minimise disruption to communities.</p>
<p><b>WATER QUALITY</b> </p> <p>Assessing current and emerging risks to water quality from the wastewater system.</p>	<p><b>NATURE'S RECOVERY &amp; SOCIAL IMPACT</b> </p> <p>Making improvements that enhance the environment and the communities we serve.</p>	<p><b>CATCHMENT APPROACH</b> </p> <p>Identifying opportunities for managing risk collaboratively across a wider catchment scale.</p>	<p><b>INVESTMENT</b> </p> <p>Investing in improvements that matter the most to our customers, environment and regulators.</p>

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## 1 Introduction

Our Drainage and Wastewater Management Plan (DWMP) is designed to create a clear, evidence-based long-term investment plan for our wastewater systems. It helps us plan for the future and work closely with local partners to deliver solutions that benefit everyone. We want you to know what's happening in your area and how our plans fit with those of other organisations we work with.

We published our first DWMP in March 2023 (called DWMP23). DWMP23 helped to shape our PR24 Business Plan for 2025–2030. You can read our DWMP23 plan here [Click](#)

In September 2024, the Government made it a legal requirement to publish a DWMP every five years. We will publish the next plan, DWMP28, in August 2028. Statutory guidance sets out how the DWMP should be produced. Compared to DWMP23, DWMP28 will:

- **Include** details on the condition and resilience of our wastewater assets
- **Focus** more on water quality impacts
- **Strengthen** collaboration with Welsh Government, Natural Resources Wales (NRW), councils, highways, and environmental groups to deliver cost-effective solutions
- **Provide** annual updates on any significant changes

This Strategic Context is here to give you a clear picture of DWMP28 – what future trends we're looking at, how we plan to deliver the best value for you and the environment, and how we'll work together to make the most of this plan.

## 2 Why is the DWMP important?

Our DWMP is all about making sure wastewater is safely taken away and treated – today and in the future. This matters to you, your community, and the environment. We want to keep our systems working well, ensure there's enough capacity in our sewers and treatment works for growing demand, and protect and improve our rivers and natural resources.

Planning ahead is key. The DWMP looks at different future scenarios so we can make smart investment decisions. DWMP28 will provide the evidence for our five-year investment plans, so getting it right now is essential. Your input matters, as it helps this plan meet your needs and priorities as well as making our proposals stronger and more effective.

Here's where we see strong alignment with what's important to you:

- **Supporting growth** – The DWMP will help local planners and developers understand where our sewer network can handle new housing developments
- **Reducing flood risk** – By sharing risk information, we can work together on climate-resilient, nature-based solutions to manage rainfall and reduce flooding from all sources
- **Improving and protecting water quality** – By assessing the impacts from our activities we can deliver solutions that protect our rivers and groundwater
- **Making the most of resources** – Collaboration means we can deliver more for less – cutting costs and minimising disruption for communities
- **Protecting environmentally sensitive sites** – By undertaking a Habitats Regulation Assessment and Strategic Environmental Assessment alongside our DWMP we can seek to ensure we protect sensitive sites

<sup>[1]</sup> How to form, publish and maintain your drainage and wastewater management plan (DWMP) - GOV.UK - [Click here](#)

### 3 DWMP28 Timeline

DWMP28 provides the evidence base to inform our 2030-2035 business planning process (known as PR29) which we expect to submit in **Autumn 2028**. To get there we will follow the timeline and Action Plan set out in **Figure 1**.



Figure 1 – DWMP28 timeline and action plan



## 4 What will the DWMP measure?

We want to understand how well our wastewater system performs today and how it will cope with future challenges. To do this, we will use measures called Performance Indicators. These help us assess every wastewater catchment and provide an overall picture at a company level. Alongside customers and stakeholders, we'll set clear targets to ensure our plan delivers the outcomes that matter most to you.

Some indicators are classed as 'Emerging'. This means they involve shared responsibilities with other organisations or require more advanced methods to measure accurately. We're actively trialling new approaches to assess these emerging indicators, ensuring we stay ahead and deliver the best possible service. The Performance Indicators that we will be measuring are set out in Tables 1 and 2.

	Activity	Summary
Sewer Flooding	Internal sewer flooding	Annual number of properties at risk from <b>internal flooding from sewers</b> . This includes sewer flooding caused by sewers being overloaded in heavy rainfall, and sewer flooding caused by blockages and other operational issues.
	External sewer flooding	Annual number of properties at risk from <b>external curtilage flooding from sewers</b> . This includes sewer flooding to curtilages caused by sewers being overloaded in heavy rainfall, and sewer flooding caused by blockages and other operational issues. It excludes flooding to highways and open areas.
Water Environment	Storm overflows	Number of <b>storm overflows</b> predicted to be at risk of not achieving 'Satisfactory' classification, as detailed in NRW's GN066 guidance note published in October 2023, 'How to classify storm overflow performance'.
	Wastewater treatment works permit compliance	There are four indicators relating to wastewater treatment works compliance: <ul style="list-style-type: none"> <li>• <b>Numeric permit compliance:</b> Number of wastewater treatment works predicted to fail numeric effluent quality permit limits. Numeric effluent quality looks at specific, measurable limits for pollutants in treated wastewater discharged into the environment</li> <li>• <b>Descriptive permit compliance at numeric sites:</b> Number of wastewater treatment works predicted to fail to meet descriptive conditions at numeric permit sites. Descriptive conditions cover rules related to management systems, monitoring, and operational procedures, such as maintenance, emergency plans, and climate change adaptation</li> <li>• <b>Dry weather flow (DWF) permit compliance:</b> Number of wastewater treatment works predicted to fail to meet discharge permit conditions for Dry Weather Flows</li> <li>• <b>Flow to full treatment (FFT) permit compliance:</b> Number of wastewater treatment works predicted to fail to meet discharge permit conditions for annual Flow to Full Treatment</li> </ul>
	River quality attributed to public sewers	Number of <b>waterbodies not achieving the NRW 'Good' status</b> due to reasons associated with sewerage asset discharges. This process is referred to as 'Rivers Not Achieving Good status' or 'RNAGS'.
	Pollution incidents	There are two indicators relating to pollution incidents in accordance with the NRW's Environmental Performance Assessment (EPA): <ul style="list-style-type: none"> <li>• <b>Serious pollution incidents:</b> Number of serious (Category 1 and 2) pollution incidents from sewerage assets</li> <li>• <b>Total pollution incidents:</b> Number of (Category 1-3) pollution incidents from sewerage assets</li> </ul>
	Bathing water quality	Number of current and future <b>designated inland and coastal bathing waters</b> where sewerage asset discharges pose a compliance risk with meeting 'sufficient' quality standards.
Economy & Community	Shellfish water quality	Number of current and future <b>designated shellfish waters</b> where sewerage assets discharges pose a compliance risk with microbial standards.

Table 1 – DWMP28 Common Performance Indicators

		Activity	Summary
CATEGORY	Flooding	<b>Surface water flooding</b> (shared responsibility)	Annual number of properties at <b>risk of surface water flooding</b> within companies' drainage and wastewater catchments. This is a shared indicator as sewerage companies are not responsible for surface water flooding, but by working together with others to manage rainfall more sustainably, this can offer multiple flood risk benefits.
		<b>River quality attributed to urban and transport discharges</b> (shared responsibility)	Number of waterbodies not achieving the NRW 'Good' (RNAGS) status due to reasons attributed to <b>discharges of urban/highway runoff and misconnections</b> . This includes an assessment of pollution caused by highway runoff from third-party highway drains and the water quality impact of discharging via public surface water sewers. Only discharges from surface water sewers are water company responsibilities, hence this is a shared indicator.
	Water Environment	<b>Emergency overflow performance</b>	<ul style="list-style-type: none"> <li>• <b>Number of emergency overflows:</b> At sewage pumping stations that operate more than once per year due to unplanned operational issues, such as power failure or equipment breakdown</li> </ul>
		<b>Wastewater treatment works permit compliance</b>	<ul style="list-style-type: none"> <li>• <b>Descriptive permit compliance:</b> Number of wastewater treatment works predicted to fail to meet descriptive permits</li> </ul>
		<b>Groundwater pollution</b>	Length of sewer (km) within groundwater source protection zones and groundwater safeguard zones where there are likely risks from <b>sewer exfiltration</b> . This is to assess the potential risk of 'leaky sewers' polluting groundwater.
		<b>Groundwater infiltration</b>	Annual number of sewer overflow during 'dry weather' caused by <b>groundwater infiltration</b> into sewers.

Table 2 – DWMP28 Emerging Performance Indicators

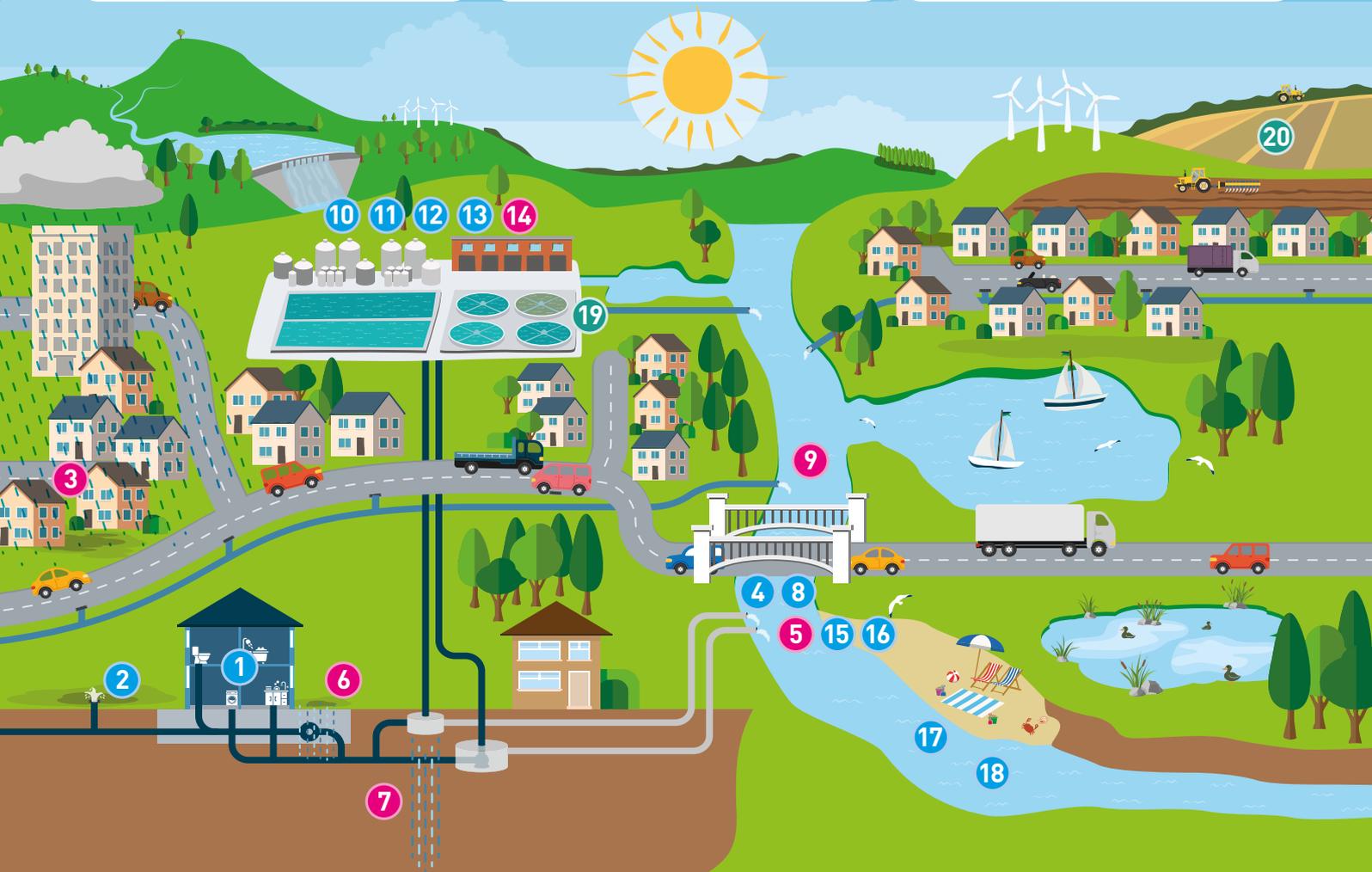
The diagram on the following page illustrates the DWMP28 performance common and emerging indicators.



**COMMON INDICATORS**

**EMERGING INDICATORS**

**OPTIONAL**  
WASCS TO INCORPORATE INTO DWMP28



**SEWER FLOODING**

- 1 Internal sewer flooding
- 2 External sewer flooding

**FLOODING**

- 3 Surface water flooding (shared)

**OVERFLOWS**

- 4 Storm overflows

**OVERFLOWS**

- 5 Emergency overflows

**GROUNDWATER**

- 6 Groundwater infiltration
- 7 Groundwater exfiltration

**WATERBODY STATUS**

Reasons for Not Achieving Good Status

- 8 Associated with sewerage assets discharge

**WATERBODY STATUS**

Reasons for Not Achieving Good Status

- 9 Associated with urban/highways runoff (shared)

**TREATMENT**

- 10 Permit compliance (numeric)
- 11 Permit compliance (descriptive at numeric sites)
- 12 Dry weather flow compliance
- 13 Flow to full treatment compliance

**TREATMENT**

- 14 Permit compliance (descriptive)

**POLLUTIONS**

- 15 Nr serious pollutions
- 16 Nr total pollutions

**WATER QUALITY**

- 17 Bathing water quality
- 18 Shellfish water quality

**BIORESOURCES**

- 19 Sludge treatment Capacity
- 20 Satisfactory sludge recycling

## 5 How is the DWMP structured?

Our DWMP assessments, outputs and stakeholder engagement are structured based on geographical levels. This helps us to communicate at different levels of detail to help audiences understand what they need to do about our plan. It also helps us to engage with the right people to develop options to improve performance.

### Level 1 – Company Level (x1)

This is the Hafren Dyfrdwy wastewater area. Our plan will communicate the results and plans at company level. We will hold Company Level Strategic Planning Group meetings with strategic stakeholders to shape the strategic direction of our plan, engage in the development of best value approaches, review the technical robustness of our processes and confirm outcomes. Stakeholders included in this group will include Natural Resources Wales, Welsh Government, Ofwat, Consumer Council for Water, customer challenge group representatives, councils including representatives from Powys Local Planning Authority, Lead Local Flood Authority and Highways. Other relevant environmental NGOs and strategic partners are also welcome.

### Level 2 – Regional River Basin Management Areas (x2\*)

Our area is split into 2 Regional River Basin Management Areas. This allows us to better align to other regional planning groups across our area. We will hold Level 2 Regional Planning Group meetings and workshops to provide a forum for collaboration between us, Powys local planning authority, environmental stakeholders and other risk management authorities. These groups will allow for more detailed discussions about specific risks and opportunities for working together to deliver improvements. \*There is a small area in the Tern which has no Hafren Dyfrdwy wastewater services, so we won't focus on this area.

### Level 3 – Wastewater Treatment Works Catchments (x50)

In Hafren Dyfrdwy, we have 50 Wastewater Treatment Works (WwTW) which serve local communities.

The Level 3 boundaries include the area of our sewered network that drains into each WwTW. We will assess every Level 3 WwTW catchment for each Performance Indicator and share the outputs. This will allow us to develop plans and work together with partners to focus on the areas which require improvement. Specific priorities at this level can be discussed in our Level 2 Regional Planning Groups.

### Level 4 – Neighbourhood Sub-catchments

We are developing an approach to break down each Level 3 WwTW catchment into smaller Level 4 Neighbourhood scale sub-catchments. This will help us understand where in a catchment risks are greatest and help identify potential areas where other partners also have priorities. There will be many sub-catchments that will help to build up the detail of our plan in the background.



## 6 What future trends are we considering?

We're planning for the future by looking at possible scenarios and trends over the next 25 years. This helps us create strategies that prepare for uncertainty and manage risk. For DWMP28, the challenge is to make sure we consider future opportunities and issues in a way that delivers clear, useful results. These insights are vital for raising awareness of what our catchments will need in the years ahead – so customers, stakeholders, and regulators can easily understand and support our plans. We will consider the following future trends:



### CLIMATE AND ENVIRONMENTAL

We want to understand how climate change may affect our environment. To do this, we'll explore a range of scenarios, looking at factors such as:

- Changes in rainfall patterns
- Future river flow projections
- River water temperatures
- Groundwater levels and quality
- The impact of rising sea levels on our estuaries



### DEVELOPMENT AND POPULATION

We carefully assess how new developments – whether residential, commercial, or industrial – may affect the wastewater system. To do this, we use a range of scenarios based on the local development plans and population growth projections from the Office for National Statistics (ONS).

We also look at the impact of “urban creep,” which happens when green spaces are replaced with paving. This reduces the amount of rainwater that can soak into the ground and increases surface water runoff.



### STATUTORY AND REGULATORY

We need to have a view on future rules and regulations affecting our sector and the environment more broadly. To do this, we will assess the impact of potential new regulations and policies, including the designation of environmentally sensitive areas such as:

- Inland bathing waters
- Nutrient Advice Areas
- Drinking Water Protection Areas
- Groundwater Safeguard Zones

We will invest in research to understand how changing environmental factors - such as pharmaceuticals, microplastics, and PFAS (per- and polyfluoroalkyl substances) - affect wastewater systems.



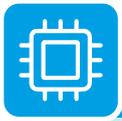
### ECONOMICS

We understand that economic conditions can change, such as inflation and the rising cost of materials. We'll take these factors into account as we plan for the future.

Our decisions will be guided by what customers value and are willing to pay for, while also considering fairness across generations.

We'll focus on delivering the best value, including the long-term impact of carbon and other changing priorities.

In addition, we'll explore opportunities to secure funding from other sources to help keep costs fair and manageable.



### TECHNOLOGY

Emerging technologies offer exciting opportunities to make our services safer, more efficient, and more sustainable. While some benefits are still unfolding, here are a few key areas we're exploring:

- **Smarter monitoring and control** – Using advanced systems to keep a closer eye on performance and respond quickly to issues
- **Innovative wastewater treatment** – New solutions that improve water quality and protect the environment
- **Next-generation sewer lining** – Stronger, longer-lasting materials to reduce disruptions and extend asset life
- **Low-carbon construction methods** – Building in ways that cut emissions and support a greener future



### CUSTOMER AND STAKEHOLDER BEHAVIOURS

How people use water could change over time. We will consider the potential impact on our wastewater system from the following changes:

- People using less water thanks to metering and adopting water-saving habits
- Flushing fewer problematic items like wet wipes, sanitary products, and fats, oils, and greases (FOG), helping to keep pipes clear
- Lifestyle changes such as more people working from home, which can affect water use patterns

We will engage with our customers through research and community education to help spread the message of the benefits small changes in lifestyle could make.

Table 3 – Future trends DWMP28 will consider

## 6.1 Climate and environmental

Climate change is no longer a distant challenge – it’s here and affecting our communities today. In recent years, we’ve seen more named storms and wider impacts across the region. These changes in weather will influence the way we deliver services and could have significant consequences for society.

While some impacts go beyond the scope of the DWMP, taking a catchment-based approach helps us coordinate plans across water and wastewater. This means we can deliver the best outcomes for customers whilst protecting the environment. DWMP28 will look closely at climate-related risks so we can build more resilient systems for the future.



Weather change	What happens first?	What happens next?
 <p><b>Rain</b> Wetter winters and heavier rain</p>	<ul style="list-style-type: none"> <li>• Too much rain ⇒ sewers and drains become full</li> <li>• River levels become high ⇒ water gets into the sewers</li> <li>• Groundwater levels become high ⇒ water seeps into the sewer pipes through cracks</li> </ul>	<ul style="list-style-type: none"> <li>• More homes at risk of flooding</li> <li>• More risk of spills into rivers</li> <li>• More flow needs treating at the Wastewater Treatment Works</li> </ul>
 <p><b>Rain</b> Drier summers</p>	<ul style="list-style-type: none"> <li>• Less water in rivers ⇒ less water available to mix with sewage discharges</li> <li>• Less water available for nature-based solutions to thrive</li> </ul>	<ul style="list-style-type: none"> <li>• Risk that river water quality gets worse</li> <li>• Nature-based solutions don’t operate as well as planned</li> </ul>
 <p><b>Storms</b> Strong winds, lightening and sea surges</p>	<ul style="list-style-type: none"> <li>• Damage to buildings, power lines and phone lines ⇒ unable to use sewer pumps and treatment limited</li> <li>• River levels in estuaries become high ⇒ water gets into the sewers</li> </ul>	<ul style="list-style-type: none"> <li>• More homes at risk of flooding</li> <li>• More risk of spills into rivers</li> <li>• Reduced ability to respond to problems</li> </ul>
 <p><b>Hotter Temperatures</b></p>	<ul style="list-style-type: none"> <li>• Rivers get warmer</li> <li>• Warmer periods can cause ground movement, affecting our assets</li> <li>• Overheating of electrics can cause power failure</li> </ul>	<ul style="list-style-type: none"> <li>• Fish and animals struggle because water quality changes</li> <li>• Some chemicals can become more dangerous in rivers</li> <li>• Risk of blockages, flooding and spills</li> </ul>

**Table 4 –** How climate change may change weather patterns and impact the wastewater system

To prepare for the challenges of climate change, the UK follows the principle: Plan for 2°C, prepare for 4°C<sup>[2]</sup>. This means we consider both the most likely and the more extreme future scenarios. We use the latest climate projections from the Met Office’s UK Climate Projections (UKCP) to make sure our DWMP looks at a range of possible futures. Because predicting climate change involves uncertainty, we assess different scenarios using Representative Concentration Pathways (RCPs) – scenarios used in climate modelling that

describe plausible future projections for greenhouse gas concentrations and their impact on temperatures.

We’ve partnered with UK Water Industry Research (UKWIR), working closely with the Met Office, to update the climate change uplift tool (known as RED-UPv4<sup>[3]</sup>) to help us evaluate how our systems perform under different climate conditions. This tool allows us to assess the impact of changing rainfall patterns due to climate change for two scenarios; RCP4.5 and RCP8.5.

<sup>[2]</sup> Climate Change Committee – Independent Assessment of UK Climate Risk [Click here](#)

<sup>[3]</sup> UKWIR – Guidance For Applying A Climate Change Rainfall Tool For Long Term Drainage And Wastewater Management In The Water Industry [Click here](#)

Scenario	Met Office projection	Change in temperature (°C) by 2081-2100 <sup>[4]</sup>	Scenario Temperature Summary
Core	RCP4.5	2.4 (1.7-3.2)	2°C
High	RCP8.5	4.3 (3.2-5.4)	4°C

**Table 5** – Climate Change scenarios used in DWMP

We use these tools to understand how changes in rainfall could affect the wastewater system. Where possible, we also include future projections for river levels and temperatures to see how these factors interact with our network. To assess how resilient our system is to climate change and storms, we will also look at risks from river and surface water flooding, as well as potential impacts from power outages.

## 6.2 Development and population

**As communities grow and new developments are built, extra flows put pressure on the sewerage system and wastewater treatment works. Local Planning Authorities ensure developments are sustainable, while sewerage companies like us plan ahead to accommodate these changes – whether residential or commercial.**

Through our DWMP, we work closely with Local Planning Authorities to understand future developments and share insights that help shape their plans. Knowing where new developments will be built is key. Different connection points can have very different impacts on the sewerage network. We look at which catchments are expected to see growth, so we can assess the effect on wastewater treatment works and check whether the rivers receiving treated water have the environmental capacity for more flows.

To plan effectively, we use:

- Planning permission data for approved sites
- Local plan allocations for future developments
- Strategic Housing and Economic Land Availability Assessment (SHELAA) data where available
- Office for National Statistics (ONS) projections for long-term growth, apportioned across catchments

As people replace green spaces and gardens with hard surfaces like driveways, more rainwater runs into the sewerage system. This “urban creep” increases flood risk. Since 2008, paving over more than 5m<sup>2</sup> of front garden requires planning permission unless permeable materials are used<sup>[5]</sup>. Enforcing planning rules for driveways and dropped kerbs is essential to reduce flooding risk. As part of DWMP28, we’ll assess the impact of urban creep using industry-standard modelling approaches.

Our goal is to use the information gathered through the DWMP to create clear outputs that we can share with

local planning authorities. These will show where there is capacity in the network, at wastewater treatment works, and in rivers to accept additional treated flows. This will help authorities plan new development in the most suitable locations and allow us to identify areas where we need to make improvements to support future growth.

## 6.3 Statutory and regulatory

**Predicting future changes to statutory and regulatory priorities can be challenging. However, past experience shows how valuable our evidence can be. For example, insights from DWMP23 helped shape Welsh Government policy through our involvement in the Wales Better River Quality Taskforce. DWMP28 will play a critical role in providing evidence for any reviews to Storm Overflow policy.**

There are ongoing reviews of water regulation in the UK, and we are expecting changes to Government legislation to reflect this in the years ahead. In July 2025, the Independent Water Commission<sup>[6]</sup>, chaired by Sir Jon Cunliffe, published its final report recommending major reforms to improve water sector regulation in England and Wales. In response, the Welsh Government made several public statements of intention<sup>[7]</sup>:

- Create a separate independent Welsh economic water regulator transferring Ofwat’s economic functions in Wales into Natural Resources Wales
- Recognition that Wales needs distinct regulatory arrangements, reflecting Welsh priorities, environmental context, culture, and legal frameworks such as the Well-being of Future Generations Act
- Developing a new National Water Strategy, setting the long-term policy direction for water management in Wales and providing clarity on priorities, system-level planning, and environmental regulation
- Support for a single National Water System Planning Authority for Wales

The Independent Water Commission report also calls for stronger long-term planning for both wastewater (DWMP) and drinking water (WRMP), with clear 10 and 25-year trajectories, while retaining 5-year funding cycles. This reinforces the need for robust DWMP evidence, supported by a consistent framework for scenario testing and cost-benefit analysis.

<sup>[4]</sup> Metoffice – UKCP18 Guidance: Representative Concentration Pathways [Click here](#)

<sup>[5]</sup> Gov.uk – Guidance on the permeable surfacing of front gardens [Click here](#)

<sup>[6]</sup> Independent Water Commission: Review of the Water Sector [Click here](#)

<sup>[7]</sup> Welsh Government: Welsh Government Response to the Independent Water Commission Report [Click here](#)

The Welsh Government is expected to publish a Water Sector Reform Green Paper for consultation in early 2026, which will set out their full response to the Independent Water Commission's report. Any changes to legislation will take time to be enacted, so in the meantime, we will continue working with current regulators to ensure DWMP28 provides the insights needed for future decisions. We expect reforms to several regulations following the Corry Independent Review<sup>[8]</sup> of Defra's regulatory landscape, including:

- Water Framework Directive Regulations (2017)
- Conservation of Habitats and Species Regulations (2017)
- Environmental Permitting Regulations (2016)

There are a number of other areas where recent changes to the regulatory landscape have been made or are anticipated that interact with the DWMP. We are updating our processes to include these updates. These include:

- The Environmental Performance Assessment Methodology 2026 to 2030<sup>[9]</sup>
- How pollution incidents are reported – NRW Guidance Note 018
- How to classify storm overflow performance – NRW Guidance Note 066<sup>[10]</sup> and 021
- The Bathing Water Regulations<sup>[11]</sup>

Whilst we may not know the specifics of all future regulatory changes, we are able to anticipate where there may be emerging designations within our area that we need to plan for. These include:

- New inland bathing waters
- Drinking Water Protection Areas
- Nutrient Advice Areas
- Groundwater Safeguard Zones

## 6.4 Economics

**Economic changes affect us all – whether it's the cost of heating our homes or the electricity needed to run a sewage pumping station or wastewater treatment works. Through our Best Value Framework, DWMP28 takes these uncertainties into account, including inflation and the changing value of materials and resources.**

Our investment plans are shaped by two key factors: what customers are willing to pay for service improvements and the statutory requirements we must meet. To make sure we reflect customer priorities, we carry out research to understand what matters most to you and what you feel is

fair – both now and for future generations.

The Best Value Framework helps us assess the balance between cost and benefit, even for services that are harder to measure. It also considers how these values might change over time.

Beyond investing in sewerage assets, we will work closely with partners to develop integrated solutions that address multiple risks. This approach also helps us identify opportunities for funding from other sources, ensuring we deliver the best outcomes for customers and communities. We're committed to working closely with our partners to explore all available funding opportunities, including the Flood and Coastal Erosion Risk Management (FCERM) Grant memorandum funding policy from Welsh Government. By collaborating on joint solutions, we can deliver better outcomes together while ensuring each partner contributes fairly to the areas they are primarily responsible for.

## 6.5 Technology

**Emerging technologies offer exciting opportunities to reduce risks and improve how we manage wastewater, even in ways we might not fully understand yet. Our innovation team is constantly exploring new solutions – whether that's better treatment processes, real-time monitoring, smart flow control, or low-carbon construction methods.**

While it's hard to predict exactly what future technologies will look like or how they'll impact us, we're committed to adopting promising innovations where they make sense for our DWMP. The real challenge is assessing technologies that haven't even been developed yet – but we're ready to adapt as they emerge.

We're already working with leading partners like Aarhus Vand in Denmark and Melbourne Water in Australia, and we're involved in multiple projects supported by the Ofwat Innovation Fund. These collaborations will help us identify near-term advances that could shape DWMP28.

<sup>[8]</sup> Defra – Dan Corry - An independent Review of Defra's Regulatory Landscape [Click here](#)

<sup>[9]</sup> Gov.uk – Introduction to EPA Methodology [Click here](#)

<sup>[10]</sup> Natural Resources Wales – How to Classify storm overflow performance [Click here](#)

<sup>[11]</sup> Legislation.gov.uk – The Bathing Water (Amendment) (England and Wales) Regulations 2025 [Click here](#)

## 6.6 Customer and stakeholder behaviours

Our customers and stakeholders are central to everything we do. That's why we listen carefully to what matters most to you and explain how you can help us achieve our shared goals. When developing our PR24 Business Plan, we carried out extensive research to understand your priorities and preferences. These insights shaped our Best Value Framework and our investment commitments for 2025-2030.

We want to work closely with our customers as we develop and deliver our DWMP. There are two key ways we'll do this:

- **Give customers a voice** – We'll invite you to share your views and help shape the plan through meaningful customer research
- **Provide helpful guidance** – We'll show how everyday actions can affect how our system works and share tips on what you can do to make a positive impact

As we seek to give our customers a voice in developing the DWMP, we'll undertake research at key stages to make sure our priorities reflect what matters most to you. This will help us understand what service improvements you most want and also what you are willing to pay for. We'll use a mix of approaches, including our existing customer platform TapChat, as well as surveys and discussions with representative customer groups. To ensure consistency, we'll align this research

### Top tips for the kitchen

We have some simple ways you can prevent blockages to keep your pipes clear and waste water flowing freely:



Scrape pots, pans and plates before washing up



Use kitchen roll to wipe grease from your pans, plates and air fryers.



Use a strainer in your kitchen sink



Collect used oil in a container and throw it in the bin

### Top tips for the bathroom

Changing some of your bathroom habits, will help keep your toilet in tip top shape and your shower's stress free:



Only ever flush the 3P's: pee, poo and (toilet) paper



Bin wipes to avoid blocked drains, even the ones that are labelled 'flushable'



Bag sanitary towels, tampons and colostomy bags then bin them



Use a bin for nappies, razors, cotton buds and dental floss

Figure 2 – Quick guide to protecting our sewers

Our DWMP will help identify where education and behaviour changes can make the biggest impact – especially if the wet wipe ban goes ahead.

with wider engagement for our PR29 Business Plan. Your feedback will help guide investment decisions for 2030–2035, alongside the broader needs of Hafren Dyfrdwy.

We know customer habits can change over time, and we want to support you in making choices that benefit both your bills and the environment. By working together, we can make a real difference. Here are some key areas we're focusing on:

- **Using water wisely** – We're working with our Water Resource Management Plan to help reduce water use. Using less water not only saves this precious resource but also means less water entering the sewer system, reducing pressure on the network. Tips on how to reduce water use can be found here - [Love your water | Helping you to save water | Wonderful on Tap | HD Cymru](#).
- **Protecting our sewers** – One of the biggest ways to keep our sewer network healthy is by preventing misuse. Things like wet wipes, sanitary products, and fats, oils, and greases (FOG) can cause serious blockages, sometimes leading to pollution in rivers. That's why we promote the "Three Ps" rule: only Pee, (toilet) Paper, and Poo should go down the toilet. The Welsh Government has recently confirmed that the Environmental Protection Regulations 2025 has been laid which will prohibit the supply of single-use wet wipes containing plastic in Wales - a big step forward!

# 7 Best Value Framework

## 7.1 What are the main components of the Best Value Framework?

Improving our wastewater system requires investment, but it's essential to keep it performing well, both now and for future generations. Our goal is to make sure every improvement delivers the greatest benefit and best value for money.

Water company performance is measured by Ofwat using key targets called Performance Commitments, which are linked to Outcome Delivery Incentives (ODIs) - reflecting priorities for customers and the environment. These ODIs allow Ofwat to reward us financially for strong performance and apply penalties if we fall short. This means we can put a clear monetary value on improving these areas. Many of these Performance Commitments align with the DWMP Performance Indicators, helping us understand the financial impact of changes and ensuring we focus on improvements that matter most.

Many improvements could provide environmental and social benefits that go beyond the main service

enhancement, for example Sustainable Drainage Solutions (SuDS). We can assign financial values to many of these benefits using well-established methods, while others are easy to measure but difficult to value.

Our Best Value Framework gives us a structured approach to: developing the whole-life costs and benefits for a range of options; putting a financial value against benefits we can value; and helping to measure those we can't monetise. We do this by using Value Metrics—monetised estimates for different types of benefits, such as human, social, natural, intellectual, manufactured and financial. We assess whole life costs and benefits to create plans that will give the greatest possible value for our customers, the environment and wider society. By applying these value metrics, we can compare the costs and benefits of different interventions. This approach ensures we create plans that deliver the greatest overall value for the resources we invest.

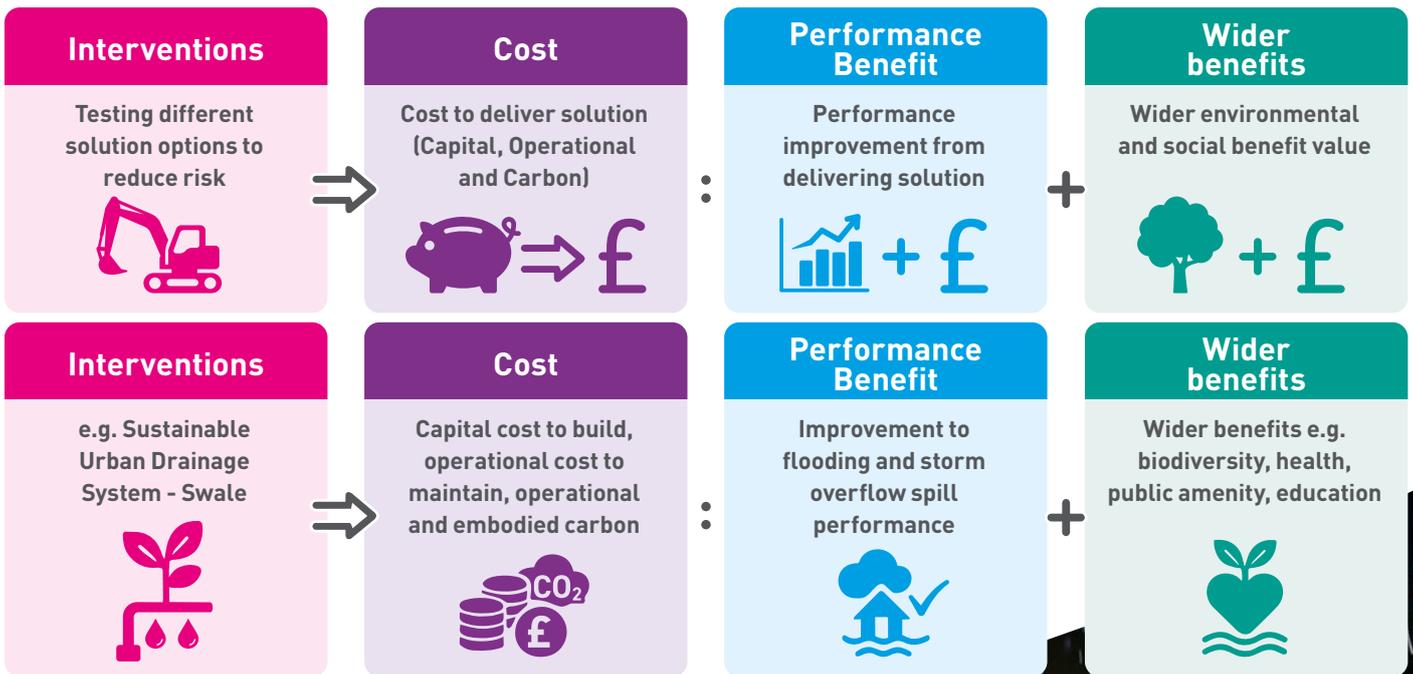


Figure 3 – The main factors included in our cost-benefit assessment

## 7.2 What is Best Value?

We want to make sure every decision offers the best value. To do this, we'll look at the costs and benefits of all available options over their lifetime (typically 30 years for most solutions). The option with the best ratio of costs to benefits, will be the one we consider the best value choice.

This assessment will be carried out across many possible interventions and balanced within a long-term 25-year plan. In some instances, our plan may contain solutions where costs are greater than the benefits but where we have a legal requirement to deliver even if no cost beneficial option exists. Here are some examples of options in **Figure 4** to help explain:

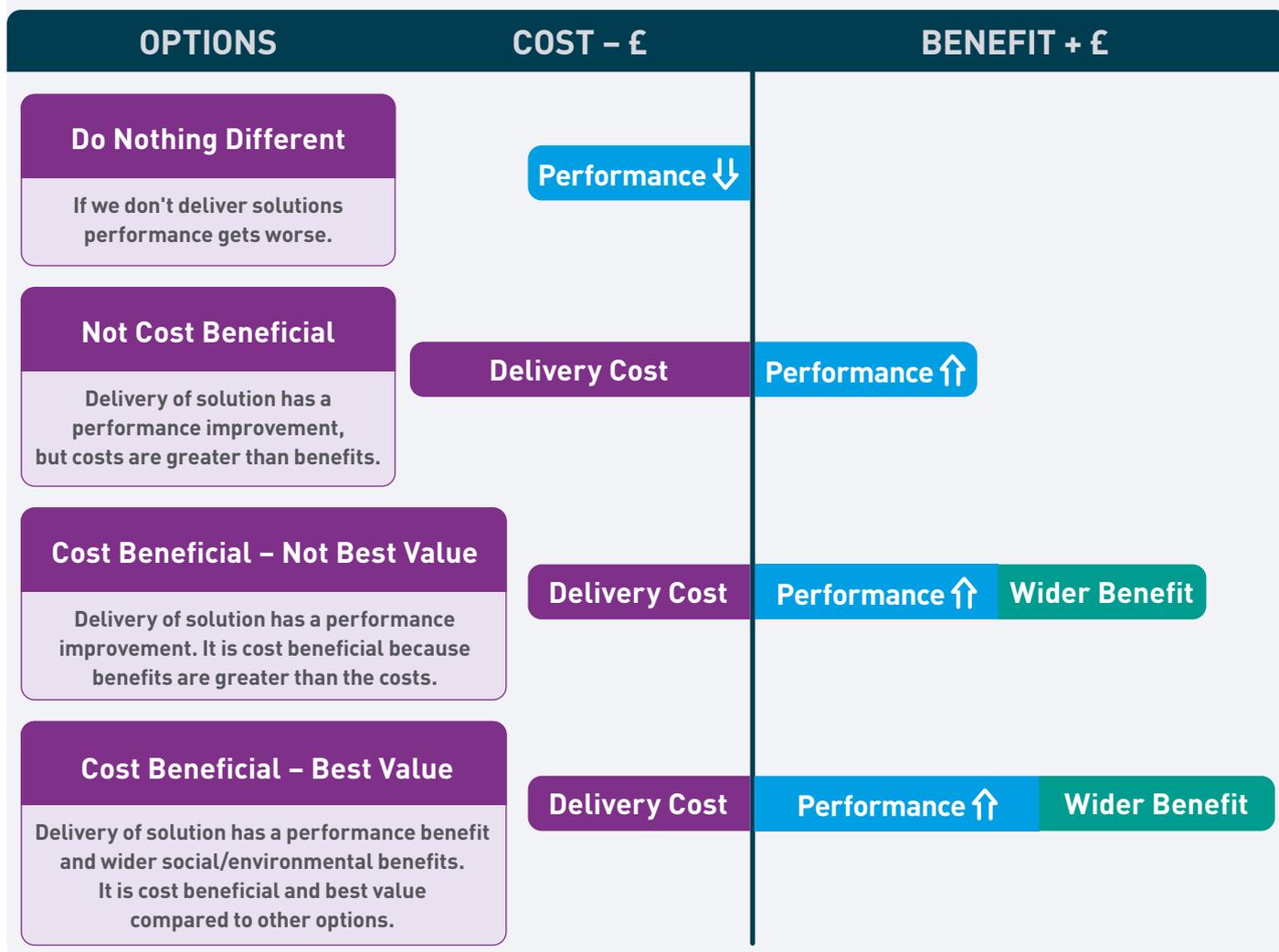


Figure 4 – Cost benefit assessments of different options to identify best value solutions

## 7.3 How are we deciding on what values to use?

As we develop our Best Value Framework, our goal is to ensure consistency across all our plans, including the Water Resource Management Plan (WRMP) and the upcoming PR29 Business Plan. This means using the same approach to developing the cost and benefit valuations so that assessment outputs are comparable across all our plans. We also want our benefit values to be transparent and based on the most reliable research available. Because this is an emerging area, some values may still need further research before we can confidently use them.

Across the industry, there are many different ways to measure benefits. To make sure we use the most robust approach, we've been working closely with stakeholders to identify strong, evidence-based values. One key resource is the Common Value framework developed through the Mainstreaming Nature-based Solutions<sup>[12]</sup> project, supported by the Ofwat Innovation Fund. This project brought together 22 partners, including water companies, expert consultants, regulators and environmental NGOs. After further consultation in late 2025, we expect a final version in early 2026.

<sup>[12]</sup> Mainstreaming nature-based solutions – Natural Capital Evidence and Metrics (NCEM) library [Click here](#)

The Common Value Framework uses a set of Service Measures (aligned to Performance Commitments) defined by Impact Categories. Our DWMP Performance Indicators align closely with these Service Measures and Impact Categories. The Common Value Framework then assigns Value Metrics to each Impact Category to support the valuation of the potential financial value of delivering a solution which addresses the Impact Category. **Figure 5** illustrates how the Common Value Framework is structured.

In producing the Common Value Framework, the project team conducted extensive research to evidence the values for the Value Metrics. This included incorporating values from multiple sources, including but not limited to the Environment Agency’s Natural Capital Evidence and Metrics (NCEM) library, FCERM Appraisal Guidance<sup>[13]</sup>, the Multi-Coloured Manual<sup>[14]</sup>, Ofwat PR24 customer research<sup>[15]</sup>, Ofwat PR24 economic research<sup>[16]</sup> and the Environment Agency’s National Water Environmental Benefit Survey (NWEBS) values<sup>[17]</sup>.

A benefit of the Common Values Framework is that the library of values included has good potential to align with the National Well-being Indicators Framework<sup>[18]</sup> included within the Well-being of Future Generations Act 2015. This will allow us to understand how the wider benefits associated with the range of solutions we will assess has the potential to contribute to the wider ambition in Wales to improve the social, economic, environmental and cultural well-being of Wales.

As we develop DWMP28, we expect new research and updates to emerge — for example, revised NWEBS values. The Common Value Framework has also highlighted areas

where evidence is limited, helping the industry prioritise research to fill these gaps. We’ll use the Common Value Framework as a reference library, selecting the values most relevant to DWMP. As new or improved research becomes available, we’ll update these values where timing aligns with the programme. In addition, we’ll work closely with our Level 1 strategic planning stakeholder group to review and refine our approach.

### 7.4 How are we considering nature-based solutions?

**Alongside the DWMP Guidelines, NRW have published expectations for the use of nature-based solutions (NbS) in the preparation of our DWMP. NbS are defined as actions which protect, conserve, restore sustainably use and manage natural or modified ecosystems. They address social, economic and environmental challenges effectively and provide human well-being, ecosystem services, resilience and biodiversity benefits.**

Our best value framework approach will consider NbS by providing values for performance and wider benefits for different solution types. This will allow us to compare a wide range of solutions, including NbS, to understand which options provide the overall best value. It is possible that in some cases NbS will not be the best value solution, and in these cases we will set out how we have considered them and provide evidence for why they have not been selected. We will follow a risk appraisal hierarchy to help us identify where NbS may be able to provide the most value.

				Value Metric	Value Metric	Value Metric	Value Metric
Service Measure	Impact Category	Unit		✓			✓
	Impact Category	Unit			✓	✓	
				GHG	Health & Wellbeing	Quality of Place	Local Economy
Internal Sewer Flooding	Hydraulic – Internal flooding of residential living space	No. properties per incident		✓	✓	✓	
	Hydraulic – Internal flooding of commercial and industrial properties	No. properties per incident		✓	✓	✓	✓
	Flooding other causes – Internal flooding of residential living space	No. properties per incident		✓	✓	✓	

**Figure 5** – The Common Value Framework structure using Internal Sewer Flooding as a worked example

<sup>[13]</sup> Environment Agency – FCERM Appraisal Guidance [Click here](#)

<sup>[14]</sup> The Multi Coloured Manual – Online [Click here](#)

<sup>[15]</sup> Ofwat – PR24 customer research [Click here](#)

<sup>[16]</sup> Ofwat – PR24 economic research [Click here](#)

<sup>[17]</sup> Environment Agency and Natural Resources Wales – Water Environmental Benefit Survey (NWEBS) values [Click here](#)

<sup>[18]</sup> Welsh Government – Well-being of Future Generations (Wales) Act 2015 Essentials Guide [Click here](#)

## 8 How can we work together with partners?

Publishing a DWMP is the responsibility of the sewerage company, but its real value depends on the quality of the information it contains and the benefits it delivers. That’s why we need the support of our partners. By working together, we can ensure DWMP28 provides meaningful insights that help shape wider stakeholder plans and priorities. Below, we’ve highlighted the key areas where DWMP28 can add value for others.

<b>GROWTH PLANNING</b> 	<b>FLOOD MITIGATION</b> 	<b>CLIMATE CHANGE</b> 	<b>ALIGNING RESOURCES</b> 
Know where the wastewater system has capacity to handle new developments.	Understand where joint flooding issues are and how we can work together to create solutions.	Mitigating climate change by managing rainwater sustainably using nature-based solutions.	Delivering more for less by aligning resources, to reduce costs and minimise disruption to communities.
<b>WATER QUALITY</b> 	<b>NATURE'S RECOVERY &amp; SOCIAL IMPACT</b> 	<b>CATCHMENT APPROACH</b> 	<b>INVESTMENT</b> 
Assessing current and emerging risks to water quality from the wastewater system.	Making improvements that enhance the environment and the communities we serve.	Identifying opportunities for managing risk collaboratively across a wider catchment scale.	Investing in improvements that matter the most to our customers, environment and regulators.

Table 6 – Areas of interest for working together with our partners

### 8.1 Growth planning

To develop DWMP28, we need to understand where Local Authorities are planning new development. This helps us assess the potential impact on the sewerage system and the environment. While this information is essential for planning future investment, our goal is for DWMP28 to give planners and developers clear visibility of where we may need time to make capacity improvements.

We aim to provide useful evidence to support Water Cycle Studies, Local Development Plans, and Spatial Development Strategies to help local authority planners identify areas with available capacity in the network and at Wastewater Treatment Works (WwTW) to accommodate growth.

We also want to share information about the environmental headroom of rivers to take additional treated flows from WwTW. This is important for highlighting areas where growth may be limited, even with the best treatment technology available.

To make this as valuable as possible, we welcome working closely with local planning authorities and developers to create practical outputs that can be updated annually.



## 8.2 Flood mitigation

Flooding is becoming a bigger challenge, especially as climate change increases the risk. Our latest DWMP23 assessment shows that 512 properties are currently at risk of sewer flooding during a 1-in-50-year storm in Hafren Dyfrdwy. By 2050, this could rise to 682 properties due to climate impacts. Alongside our modelling of the sewer flooding risk, we'll use the latest available NRW flood maps to understand surface water flood risk.

Responsibility for managing flooding depends on the cause. You can find more guidance in our Guide to Sewer Flooding<sup>[19]</sup> and in Figure 6. However, boundaries are often blurred – water doesn't respect property lines or organisational roles. That's why working together is essential. By collaborating with partners, we can deliver better value, stronger solutions ensuring we tackle complex flooding challenges effectively whilst partners fund their fair share of the issue.

One key area where collaboration is essential is surface water flooding – this happens when rainfall runs off the land before entering underground drainage systems. While sewerage companies aren't directly responsible for surface water flooding, this same runoff can enter public sewers and increase the risk of sewer flooding.

That's why we want to work closely with Lead Local Flood Authorities (LLFAs), Internal Drainage Boards (IDBs), Natural Resources Wales (NRW) and other partners to develop integrated solutions that tackle both surface water and sewer flooding together. This includes working with partners on developing:

- Strategic Flood Risk Assessments
- Flood Risk Management Plans
- Local Flood Risk Management Strategies
- Surface Water Management Plans

We're also using DWMPs to help shape the next cycle of the Flood and Coastal Erosion Risk Management Strategy (FCERM), which will guide projects between 2029 and 2035. Looking further ahead, DWMP28 could help identify opportunities beyond 2035 for future FCERM cycles.

In addition, we see real value in understanding how river flooding can impact the sewerage network. High river levels can inundate sewers and limit their ability to function properly. To address this, we plan to assess where rivers and sewer outfalls interact so we can identify and develop the right mitigation measures.

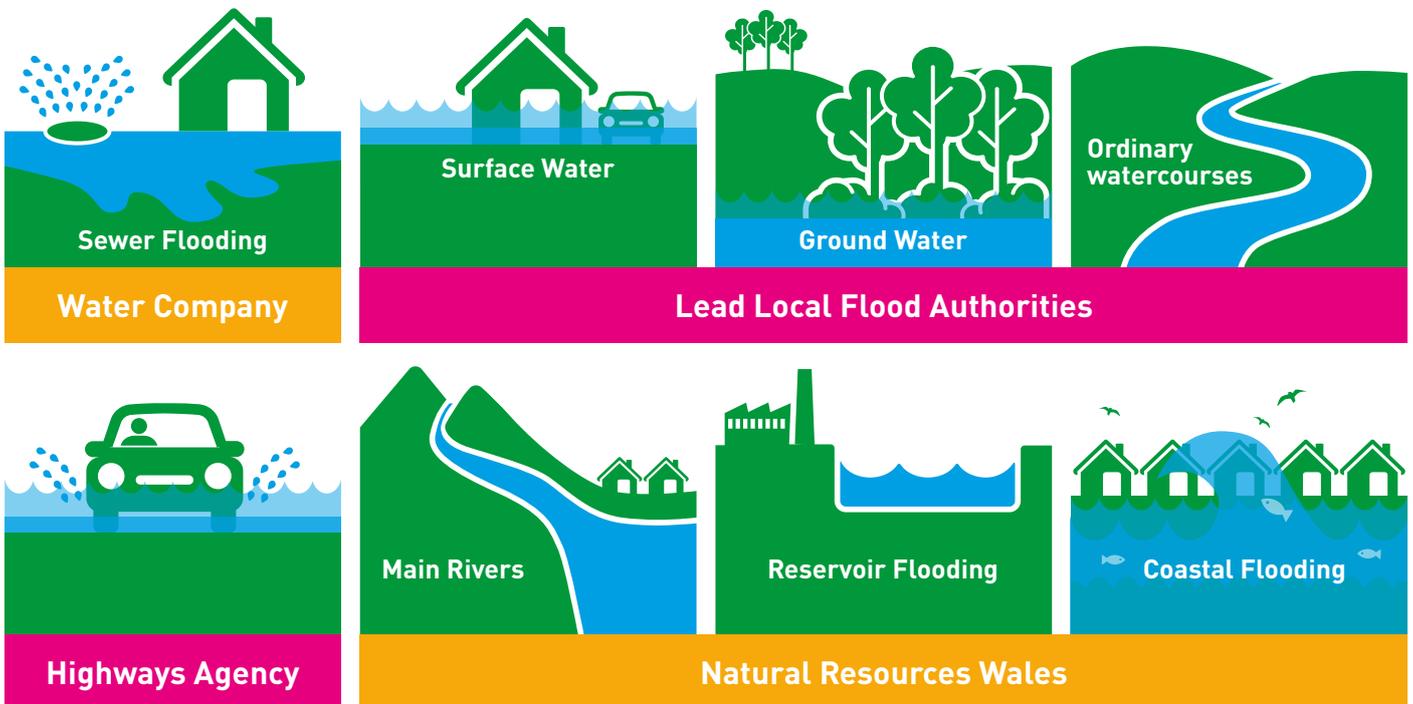


Figure 6 – Organisations responsible for managing different causes of flooding

<sup>[19]</sup> Hafren Dyfrdwy – Your guide to sewer flooding [Click here](#)

### 8.3 Climate change

Climate change is one of the biggest challenges we all face, and we're committed to both reducing its impact and adapting to its effects. The DWMP plays a vital role in understanding how climate change could affect our wastewater systems. This includes assessing risks such as flooding and changes to water quality caused by shifting rainfall patterns and river flows. Because climate change affects so many areas, we're aligning our work with other key plans. These include:

The DWMP plays a vital role in understanding how climate change could affect our wastewater systems. This includes assessing risks such as flooding and changes to water quality caused by shifting rainfall patterns and river flows. Because climate change affects so many areas, we're aligning our work with other key plans. These include:

- Hafren Dyfrdwy's Water Resource Management Plan (WRMP)
- National Environment Programme (NEP)
- Mid Wales Area Statement
- We also support plans developed by others, such as Local Development Plans, River Basin Management Plans (RBMP) and the national Flood and Coastal Erosion Risk Management Strategy (FCERM)

Our Best Value Framework helps us consider natural capital and the additional benefits to the environment from nature-based solutions when planning solutions. This means we aim to create plans that not only reduce climate impacts but also cut carbon emissions and boost biodiversity. Nature-based solutions such as wetlands, Natural Flood Management, and sustainable drainage systems (SuDS) can make our communities more resilient. By consistently valuing their benefits, we can show they offer the best value for everyone.

### 8.4 Aligning resources

As we develop integrated solutions, DWMP28 offers a great opportunity to bring resources together and create stronger alignment. We will do this through collaboration – by engaging stakeholders in developing solutions and sharing existing plans to identify opportunities. There are many ways to align outputs from current and emerging plans, including:

- National Flood and Coastal Erosion Risk Management Strategy (FCERM)
- Local Flood Risk Management Strategies (LFRMS)
- Surface Water Management Plans (SWMPs)
- Transport for Wales Strategic Road Plans
- Local Development Plans
- Mid Wales Area Statement

We see particular value in working with local councils and

Highways Authorities to align plans and responsibilities. Where multiple risk management authorities overlap, we can create integrated solutions that deliver more for communities. This approach also opens the door to joint funding opportunities. By combining highway improvements, surface water flooding mitigation, and sewer flooding solutions, we can reduce overall costs while tackling water inflows and pollution risks at their source.

### 8.5 Water quality

**The health of our rivers and groundwater is important to us and to the communities we serve. Healthy, resilient rivers are vital for nature's recovery and sustainable growth. It is a key aim of the Wales Better River Quality Taskforce<sup>[20]</sup> to improve Welsh rivers by tackling storm overflow impacts, enhancing regulation and increasing public awareness.**

DWMP28 will set out how we'll manage our impact on the water environment for the long term. We know how important it is to work together to protect and improve river health. Water quality plays a key role in wider plans like Local Development Plans and River Basin Management Plans (RBMPs).

Our Better Water Quality plan<sup>[21]</sup> sets out our pledges to protect our rivers. Are pledges are to:

- Ensure storm overflows and sewage treatment works do not harm rivers
- Create more opportunities for everyone to enjoy the region's rivers
- Support others to improve and care for rivers
- Enhance rivers and create new habitats so wildlife can thrive
- Be open and transparent about performance and plans

One new challenge DWMP28 will seek to better understand, alongside Highways Authorities, is the impact of urban and transport runoff on water quality. Rainfall falling on roads can carry pollutants like tyre debris, tarmac particles, and hydrocarbons into watercourses through highway drains. While sewerage companies aren't responsible for sweeping roads or cleaning gullies, not doing this regularly can lead to pollutants entering public surface water sewers. Understanding this risk is an emerging area, and we're committed to working with local Highway Authorities and National Highways to take a more joined-up approach to protecting the environment.

We have good records of our sewer network and in many places, we have carried out surveys to understand where roads connect to our system. However, we don't yet have full details of highway drainage systems that connect directly to rivers and may contribute to water quality issues. By working together with local councils, we can better understand these risks and take action to protect our rivers for future generations.

<sup>[20]</sup> Natural Resources Wales – Wales Better River Quality Taskforce [Click here](#)

<sup>[21]</sup> Hafren Dyfrdwy – Our Better Water Quality plan [Click here](#)

## 8.6 Nature's recovery and social impact

**When we develop solutions to manage risks, we also look for ways to protect and enhance nature while creating positive social impact. These considerations will form part of our Best Value Framework, ensuring that the benefits of habitats and ecosystem services are properly recognised and valued.**

As part of DWMP28, we'll carry out a Strategic Environmental Assessment (SEA) and a Habitats Regulation Assessment (HRA), starting with initial screening to understand requirements. There are great opportunities to align with wider plans – such as Area Statements and Local Development Plans – to maximise environmental and social benefits. For example, we can explore nature-based solutions to manage surface water before it enters the sewer network.

## 8.7 Aligning resources

**The wastewater system is closely connected to the wider water cycle, so we're taking a catchment-based approach wherever possible to deliver broader benefits. One way we're doing this is by aligning DWMP28 with our Water Resource Management Plan (WRMP).**

This means asking questions like: How can we better protect water resources, reduce flood risk, and improve water quality within a catchment? We'll also work with existing Catchment Based Approach (CaBA) groups, such as the Severn Uplands group and the wider Severn Valley water Management Scheme to unlock wider opportunities. Our goal is to make sure DWMP28 complements and supports the vision of a catchment-focused approach.

## 8.8 Annual reviews

**Following the publication of our Final DWMP28 in August 2028, we'll carry out and share an annual review. This review will:**

- Update performance indicators with the latest data
- Check for any significant changes in our region or specific catchments, such as:
  - Projected growth trends
  - New statutory or regulatory requirements
  - Emerging performance issues that may need additional plans

Our goal is to make this review useful and relevant, ensuring you have access to the most up-to-date information to support planning and delivery of solutions.

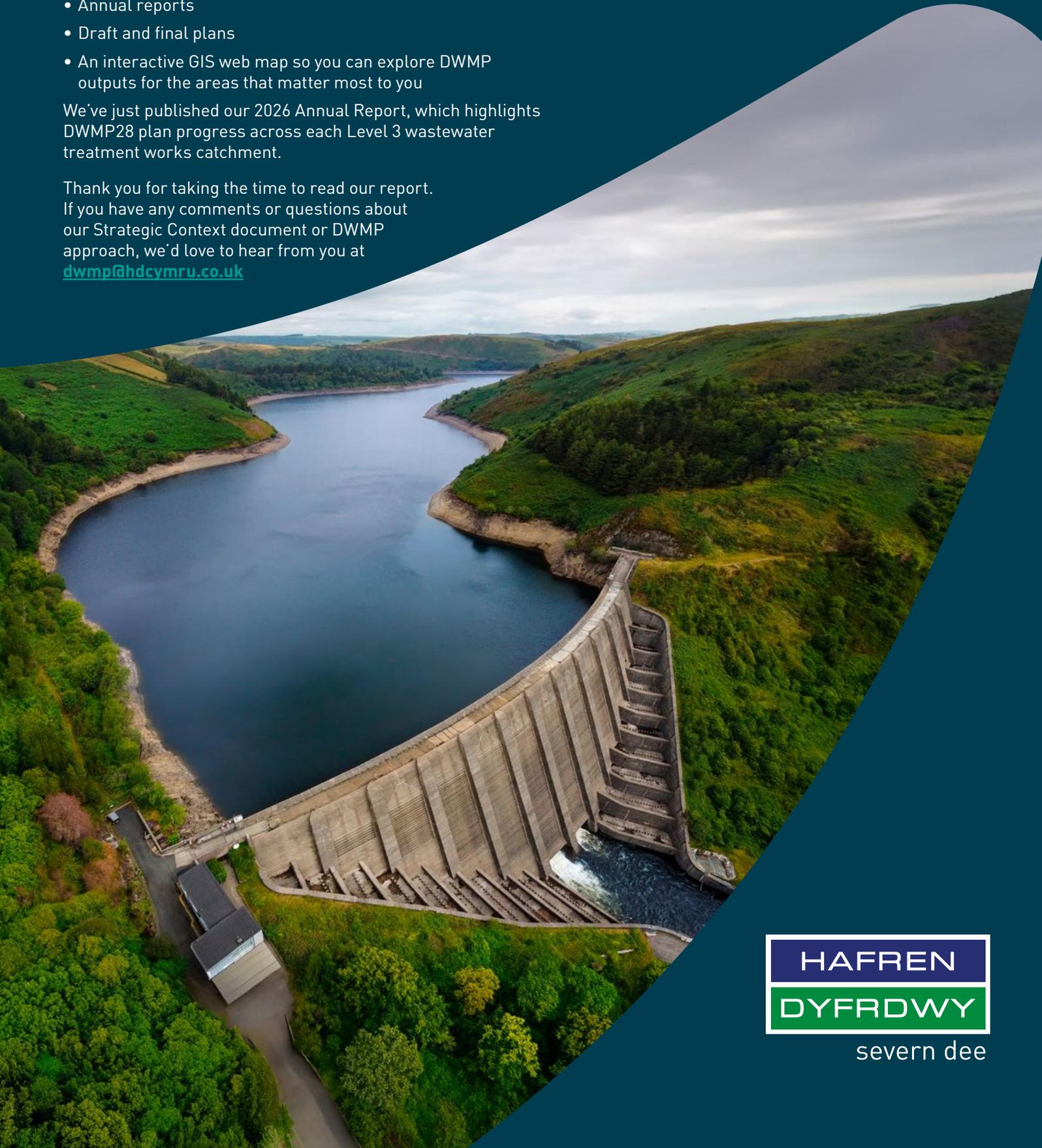
## 📍 Where can I find out more?

We're excited to share that our [DWMP28 website](#) is now live!  
This will be your go-to place for updates as we progress through the DWMP28 journey.  
You'll find:

- Regular newsletters
- Annual reports
- Draft and final plans
- An interactive GIS web map so you can explore DWMP outputs for the areas that matter most to you

We've just published our 2026 Annual Report, which highlights DWMP28 plan progress across each Level 3 wastewater treatment works catchment.

Thank you for taking the time to read our report.  
If you have any comments or questions about our Strategic Context document or DWMP approach, we'd love to hear from you at [dwmp@hdcymru.co.uk](mailto:dwmp@hdcymru.co.uk)



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