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DY12 2EL



Competition and Marketing Authority
By email:
waterdetermination2020@cma.gov.uk

11th May 2020

Dear sirs

Water Company Business Plans 2020-2025

We understand that you have had strong representations from Anglian Water Northumbrian Water and Yorkshire Water challenging OFWAT's Final Determination of their 2020-2035 business plans

The National Flood Forum strongly supports the representations for greater partnership working and collaboration, building on the work to date. These recognise and support the increased role that partnership working will need to play if we are to successfully manage water in the years ahead.

The National Flood Forum supports and represents a network of over 300 Flood Action Groups across England and Wales. Over many years groups have consistently called for much greater coordination and partnership working between Risk Management Authorities (RMAs) to address their flood risk issues. In many cases their concerns are simply passed from one organisation to another, often for decades, leaving communities living in fear of having their homes and businesses flooded. In many instances communities are flooded regularly, almost always with sewage. This remains a major issue and reflects the history of siloed working by the various RMAs.

In recent years there has been a move by many RMAs, including some water companies to coordinate their activity and to work more closely with communities. Not only does this introduce cost and efficiency savings over the long term but also leads to better results for communities. Indeed, many communities have proactively participated or led this work.

Supporting and representing flood risk communities

The challenges over the next few years will increase, from climate change, rising sea level, development and ageing infrastructure. National policies are recognising that much greater collaboration and partnership working will be needed by all water companies and RMAs if these challenges are to be met, both strategically and operationally. The National Flood Forum has been actively involved with many of these policy initiatives, promoting policies and coordinated working that will improve the lives of people in communities:

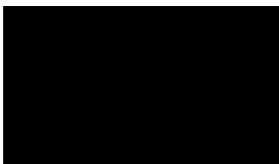
- Draft Flood and Coast Risk Management Strategy
- Environment Bill
- Draft Surface Water Review
- Sewerage Sector Guidance
- Drainage and Water Management Frameworks

Water Company business plans should reflect this wider policy environment. As the pressures increase, there is an urgent need to build upon joint work already undertaken in order to meet the strategic and operational challenges ahead. To properly develop adaptive approaches for the future requires investment in partnership working, collaboration and coordination now. Without it, future investment costs will simply rise and communities will be left to suffer alone.

Now is not the time to prioritise short term price savings over the trauma that many communities have to suffer.

We believe that OFWATS determinations fail to recognise this.

Yours sincerely



Paul Cobbing
Chief Executive

Supporting and representing flood risk communities

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