

From: [REDACTED]
To: [WaterPR24References](#)
Subject: Northumbria Water CMA Appeal
Date: 22 April 2025 15:57:06

Dear CMA,

I write as Chair and on behalf of the Northumbria Regional Flood and Coastal Committee, in support of the Northumbria Water appeal in regard to the Ofwat decision on the company 2025- 2030 business plan.

Our RFCC flood management programme invests in a range of flood protection and mitigation measures across the northeast and is a partnership between the Environment Agency and risk management authorities of which the Northumbria Water company is a key player. The legacy of long gone heavy industry and mining is one of complex flood and drainage problems compounded by ancient and inadequate urban water management infrastructure. The relationship between flooding, urban water management, ground water rebound, and wastewater management is very complex, and the impact of our changing climate is making practical solutions to flood and pollution reduction very challenging. Our committee has a programme which has over the last 5 years committed over £130 million to solving flood and water related issues. The funds come from DEFRA grant in aid, local levy raised by our local authorities and funds from a range of other partners including the water company.

In order to provide clarity and coordination we formed a partnership between the water company, EA and local risk management authorities some years ago. The Northumbria Integrated Drainage Partnership is unique in the RFCC world and is vital in helping find integrated solutions. It researches flood risk problems, identifies solutions and then allocates responsibility and funds for dealing with the problems that I describe. Water Company involvement in this process is vital and without it those at flood risk would be subject to a disjointed and inefficient management system, uncoordinated and incapable of finding integrated solution to the flood and water risk management problems that they face. Continued and increased investment from us all is extremely important as we struggle with many long term and future problems and increased risk.

From my understanding of the Ofwat determination I am concerned that there will be significant impact on our ability to continue at a meaningful level the development and construction of solutions to our problems of flooding and water quality. I am especially worried by the removal of, as would see it, key elements of the Business Plan funding which in my view can only have a retrograde impact. In particular the removal of £160 million earmarked for asset health and condition improvement will have a significant impact on the collaborative programmes that I have identified above. In consequence the flood management and water quality issues that charge payers and the public at risk face in the

North east will increase in severity rather than being managed in a sensible and coordinated way. Aging assets are now found to be even more threatened with failure as we grapple with climate change, increased storminess and power supply systems becoming increasingly vulnerable.

In conclusion the Northumbria RFCC would ask in consideration of the Water Company appeal that you reconsider the Ofwat determination and support the reinstatement of those elements that will directly and significantly affect flood risk and the impact of complex combined problems of aging assets and complex combinations of climate change and asset condition.

Yours faithfully

Phil Rothwell
Chair Northumbria RFCC