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By Email.

To Whom it May Concern,

16/04/2025

**Re CMA Referral of Northumbrian Water 2025–2030 Business Plan**

I am writing in my capacity as Chief Executive and on behalf of the Board of Trustees of the Tees Rivers Trust and as Chair of the Tees Catchment Partnership to express support for Northumbrian Water Group's (NWG) referral of Ofwat's Final Determination to the Competition and Markets Authority (CMA).

As organisations working on the frontline of river restoration and nature recovery, we are acutely aware of the scale and urgency of the challenges we face. The UK is now recognised as one of the most nature-depleted countries in the world, and our freshwater environments are under increasing pressure—from climate change, legacy pollution, land use, and aging infrastructure. These pressures are not abstract; they manifest as more frequent storm events, increased pollution incidents, biodiversity loss, and diminished resilience in both natural and built systems.

In this context, NWG's ambition to significantly scale up investment in both environmental improvements and infrastructure resilience is not only welcome—it is essential. While we strongly believe that water companies must meet their core obligations to properly manage and treat wastewater, we also see the enormous value in the complementary, catchment-wide work that NWG has undertaken with partners over recent years.

The Tees Catchment Partnership has worked closely with NWG to deliver nature-based solutions (NbS) that improve water quality, reduce flood risk, restore habitats, and engage local communities. These types of interventions—wetland creation, riparian planting, natural flood management—offer multiple, long-term benefits and are a vital part of the jigsaw in restoring ecological health. However, these solutions require sustained investment and collaborative effort. They cannot succeed without robust infrastructure and long-term planning that recognises the interconnectedness of the water cycle, land use, and community wellbeing.

Ofwat's Final Determination, by failing to support NWG's proposals to improve asset resilience and maintain ageing infrastructure, risks undermining not just the company's core responsibilities, but also the broader environmental partnerships and programmes we are working hard to implement. Power failures at pumping stations, overloaded treatment works, and deferred maintenance directly translate into pollution events and missed opportunities for river recovery. Climate change will only increase these risks unless the sector is supported to act now.

The Tees Rivers Trust is a Registered Charity no.1128953 and a company limited by guarantee no. 6832672.



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We believe the investment proposed by NWG—particularly its commitment to over £1.7 billion of environmental improvements and continued partnership working—will play a crucial role in reversing the ecological decline in our region. It aligns closely with national policy ambitions for integrated catchment management and local environmental delivery, and it represents a genuine opportunity to build resilience into both natural systems and the infrastructure that supports them.

We therefore urge the CMA to recognise that the referral is not simply about costs and returns, but about enabling a systems-level shift in how we protect and enhance our rivers. This is a pivotal moment to support a more integrated, nature-based, and partnership-driven approach to environmental stewardship.

Yours faithfully,



Ben Lamb  
CEO