

16 April 2025

Dear CMA,

### Northumbrian Water Group's Business Plan

I am writing to support Northumbrian Water Group's Business Plan, which I understand has been referred to the CMA for review following OFWAT's decision on PR24.

The Rivers Trust is a national charity with a strong interest in restoring the health of rivers. We are concerned that OFWAT decided not to support elements in the Plan that would fund asset maintenance and climate resilience.

It is our understanding that all water companies' **asset maintenance** budgets are inadequate and that this causes frequent pollution incidents that are very damaging to river ecology and the amenity and safety of waterbodies used for recreation. We heard of one instance in a sewage pumping station which is meant to have three pumps, but only one was working because the other two had been cannibalised for spare parts. Maintaining asset health is fundamental to preventing pollution incidents from occurring.

To reduce funding available for climate resilience, at a time when the climate is changing faster than most people had predicted, seems wrong-headed. I recently heard someone say that if climate change were a shark, water would be its teeth. Drought, flooding and overloaded sewers will all become more frequent, and will all be compounded by rapid development of housing and associated infrastructure.

The Rivers Trust would like to support Northumbrian Water Group's referral of OFWAT's decision to you, and urge you to allow the company to raise and spend these funds for purposes which will make a material difference to the health of rivers, but also the resilience of communities to climate change.

Yours faithfully,



Mark Lloyd  
Chief Executive