

Method Statement: Engagement With Stakeholders

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A consultation on the WRSE Method Statements was undertaken in Autumn 2020 – the consultation details can be viewed on the WRSE engagement website at <https://wrse.uk.engagementhq.com/method-statements>.

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Executive Summary

Water Resources South East (WRSE) is developing a multi-sector, regional resilience plan to secure water supplies for the South East until 2075.

We have prepared Method Statements setting out the processes and procedures we will follow when preparing all the technical elements for our regional resilience plan. We consulted on the Method Statements between July and October 2020, early in the plan preparation process, to ensure that our methods are transparent and, as far as possible, reflect the views and requirements of customers and stakeholders. We received a number of responses as part of the consultation which identified points of concern and also areas for improvement. We have updated our Method Statements in response to the feedback received and also to take into account the requirements set out in the updated Water Resources Planning Guideline¹ and supplementary guidance.

Figure ES1 sets out the Method Statements and how each will contribute to the preparation of the multi-sector regional resilience plan. Engagement with stakeholders is an important part of developing the regional plan and the water companies respective Water Resource Management Plans 2024 (WRMP24), and is part of the development and application of the technical methods and approaches. As such engagement is shown as informing all stages of the process.

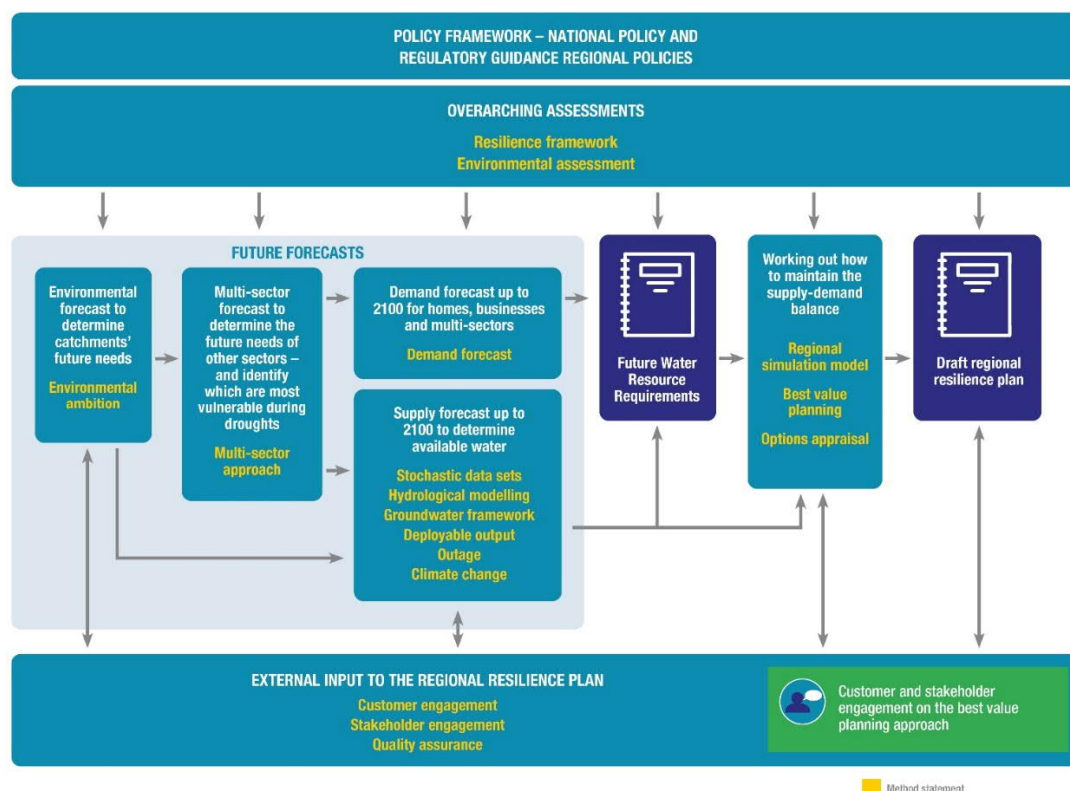
We are working with a wide range of organisations and interested parties in the development of the plan to understand their future needs and priorities and ensure these are reflected in the regional plan.

¹ Water Resources Planning Guideline, Environment Agency, Ofwat, Natural Resources Wales, July 2021

We have established stakeholder groups comprising the Stakeholder Advisory Board, the Environmental Advisory Group, and the Multi-sector Advisory Group to ensure focused engagement and advice, on key aspects of the plan. In addition to engagement with these groups we continue to engage with the wider stakeholder community through meetings and the use of online channels. We aim to share information in an accessible and timely way, provide opportunity to input at a formative stage, and listen and respond to feedback.

This stakeholder engagement Method Statement sets out our approach to engage with these communities, ensuring openness and transparency. Our approach will evolve both in response to strategic and technical developments and also feedback from stakeholders. We will endeavour to clearly communicate with stakeholders and keep them briefed on the engagement and technical programmes of work.

Figure ES1: Overview of the Method Statements and their role in the development of the WRSE regional resilience plan



1 Introduction

- 1.1 Engagement with stakeholders is an important part of the development of the South East (SE) regional plan and water companies respective WRMP24s. There is a diverse community with a stake in planning future water resources and our aim is to be open and transparent, sharing information in a timely way to raise awareness of the plan and to seek active participation to develop a multi-sector plan that identifies the solutions that may form part of water companies WRMP24s.
- 1.2 WRSE, and the member water companies, work collaboratively through the Engagement and Communications Board (ECB) to ensure communication and engagement activity is coordinated, inclusive and effective. The Environment Agency attends the ECB contributing to the Board whilst retaining its independent role.
- 1.3 We have designed our engagement programme to meet the expectations set out in the National Framework and the Water Resources Planning Guideline and to support the development of the regional plan and company WRMPs.
- 1.4 We seek to:
 - ensure we develop a plan which provides a secure and sustainable water supply which meets the future needs for public water supply and other sectors, supports the well-being of society and economic growth.
 - agree the strategic challenges facing the region, e.g. climate change, population growth, protection and enhancement of the environment, as well as the foundation data and scenarios that will be used to develop the planning forecasts.
 - inform the policies that will be adopted in the plan – specifically around key areas such as environmental ambition, risk and resilience, and the use of drought orders and permits.
 - build an understanding of, and agreement to, the technical methods, data and assumptions employed in the plan.
 - contribute to the solutions considered in the plan, including catchment, nature based and multi-sector solutions, as well as proposals for innovative solutions.

- engage on the strategic resource options which will be considered in the development of the plan.
- agree the objectives, criteria and metrics used to inform the development of the best value plan and build an understanding of, and agreement to, the decision-making process to help determine the preferred plan.
- gain support for the overall plan, and where there are areas of challenge to understand the basis for the challenges and be able to clearly articulate and evidence the approach and decisions made by WRSE and the member companies.
- ensure a clear and transparent approach for stakeholders, specifically in respect of the alignment of the regional plan with other regional plans, and also with other companies WRMP24s and wider planning processes.

2 Feedback on our approach

- 2.1 We sought feedback on the draft WRSE Method Statements as part of a consultation held from July to October 2020. The feedback to the consultation covered a wide range of topics, the issues raised have been addressed in the relevant Method Statement. Specifically, in terms of engagement, and working with stakeholders, the main points of feedback are set out in Table 1.
- 2.2 We have considered the feedback received to the consultation, the requirements of the regulatory guideline and also learning from activities undertaken over the past year, and considered changes and improvements to our approach. This is summarised in Table 1.

Table 1 Summary of consultation feedback relevant to the stakeholder engagement programme

Consultation feedback and regulatory requirements	WRSE consideration
Timing of engagement Engage at an early stage especially if your plan is likely to be complex or include significant change thereby reducing the risk of issues being identified at a later stage	The planning challenges faced in the SE are significant and complex and as such the approach and tools used by WRSE to develop the regional plan are detailed and complex. WRSE is committed to develop the plan openly and transparently and has developed a programme of engagement which supports each stage of the technical programme and shares information at a timely and formative stage.
Breadth of engagement Stakeholder engagement on such a complex process will be a significant challenge for WRSE, the methodology statement	The WRSE engagement programme involves the wide stakeholder community, as well as customers. As part of the engagement to date we have checked back on whether the approach and technical work is clear and understandable and if there is sufficient opportunity to

<p>needs to provide more information on how this challenge will be overcome.</p> <p>Ensure the engagement involves both statutory and non-statutory consultees including other regional groups, water suppliers affected by the supply system, other water companies, local catchment partnerships to ensure consideration of local pressures and local solutions.</p> <p>Ofwat specifically requested pre-consultation engagement prior to the draft regional plan in August 2021.</p>	<p>contribute. Overall, the feedback was positive. We recognise the pressure on stakeholders and resource constraints, and also the potential for engagement “fatigue”, and work to respond to feedback on when and how we engage to ensure the approach is efficient and effective.</p> <p>In summary:</p> <ul style="list-style-type: none"> • There are a host of cross-regional and strategic planning groups which are attended by WRSE and the SE member companies to ensure compliance with regulatory requirements and coordinated activity. • Regulators are members of the WRSE technical and engagement boards and as such are able to contribute alongside water companies to the design and execution of activities. • WRSE hosted pre-consultation discussions with Ofwat (March 21 and April 21) • WRSE has established stakeholder groups – the Advisory Board, Environmental Group and Multi-sector group, the membership was designed to ensure the groups represent the broad regional stakeholder community. • WRSE has broadened its reach through other channels such as the Regional Flood and Coastal Committee, Developers Forum, LEPS and Retail associations and has responded to requests such as attendance at a SE local government forum • WRSE had led engagement and consultation on the components of the plan as the work has progressed using tiered documentation to respond to the varying appetites of stakeholders and various methods. • WRSE and the water companies have held forums and meetings to ensure the wide stakeholder community is briefed and has an opportunity to feed into the development of the plan. This is shown in Figure 4. • WRSE hosted public consultation on the emerging plan in January 2022. • WRSE will host public consultation on the draft plan in November 2022.
<p>WRSE Stakeholder Groups</p> <ul style="list-style-type: none"> • Environmental Advisory Group – CCT commented that the representation is limited in its coverage of heritage, recreational, landscape and other areas outside of the narrower natural environment interests. • Multi-sector group should be broader than industries which have a licence to abstract water from the environment and should encompass other sectors that actively manage and invest in water infrastructure, for flood defence, conservation, recreation, navigation • Deepen the involvement of the WRSE stakeholder groups in the technical work so that they have more responsibility in the development of the plan. For example, the Advisory and Stakeholder groups should be given some responsibility in the selection of decision making and resilience criteria 	<ul style="list-style-type: none"> • The Environmental Advisory Group comprises regulators, NGOs and company representatives. The discussions have covered topics including landscape, recreation, and wellbeing, at a high level. We note this concern and will ensure the wider scope continues to be part of the ongoing discussions. It is also part of the SEA assessments that will be completed to inform the plan. • We continue to ensure these other, wider interest areas are included within our engagement processes and have the opportunity to scale up/down their level of direct engagement to fit with their needs. • We have reviewed and revised the Terms of Reference of the Stakeholder Advisory Board to strengthen its remit in the development of the plan, with specific areas of focus and outputs. • The WRSE programme of engagement is multi-faceted and aims to provide multiple touchpoints for stakeholders to get involved

<ul style="list-style-type: none"> CCT queried where those stakeholders with a specific interest, such as a specific water resource solution, have a voice within the WRSE stakeholder structure. 	<p>and contribute to the development of the plan for example consultation on technical outputs, at meetings and through the consultation. If the current channels are not considered to provide sufficient opportunity or cover the topics of interest, we are happy to meet and discuss.</p>
<p>Clarity and transparency</p> <p>Need for transparency in methods, data, assumptions, and decisions so that customers, stakeholders, regulators, and government can understand and comment</p>	<p>WRSE recognises that the activity is technically complex and has endeavoured to share information in a clear and accessible way. Method Statements covering the technical aspects of work have been consulted on and published.</p> <p>WRSE has sought feedback on topics for discussion and we have responded to this such as hosting a webinar on the demand forecasts and the adaptive planning framework.</p>
<p>Environmental destination</p> <p>Important that there is consultation to define the long-term environmental destination, including engagement at a catchment level to help in developing catchment options.</p>	<ul style="list-style-type: none"> In the updated Future Water Resource Requirements (May 2021) and Environmental Ambition Method Statement we have set out the environmental scenarios being considered. We have held many discussions on this at stakeholder meetings as this work evolved recognising it is significant in shaping the plan In collaboration with the EA we have defined a suite of scenarios to reflect the scale, pace, and delivery mode for the environmental destination. We have discussed these with the EAG who supported the approach. We will share the modelling outputs to enable informed discussion on the path to take. We have engaged with catchment groups, and the wider stakeholder community, to identify catchment issues and potential opportunities, some of which will be taken forward for consideration in the regional plan and others will be promoted to be progressed through other delivery routes such as DWMPs.
<p>Best value planning framework – objectives, criteria, and metrics</p> <p>Objectives should be informed by Government and regulator policy and the aspirations of company, customers, and stakeholders and WRSE should explain how stakeholders are involved in this process and how these are used in decision making including the sensitivity of the plan to metric scoring.</p>	<p>WRSE developed a draft best value planning framework including objectives, criteria and metrics taking account of statutory, regulatory and policy expectations and sought feedback via a consultation held in February 2021. WRSE responded to the feedback and published a response document, an overarching summary document as well as the updated Best Value Planning Method Statement which will set out the approach in detail including weighting criteria and sensitivity testing.</p>
<p>Best value planning decision making</p> <p>As part of the decision-making processes WRSE should gather the views of a representative range of customers and stakeholders, who should be aware of the implications of their preferences on the investment programme. Any engagement should make clear the consequences and cumulative impacts of customer or stakeholder choices or preferences.</p>	<p>WRSE is developing an interactive tool to support engagement with customers to help communicate alternative programmes and seek feedback on the programmes.</p> <p>The detailed decision-making process is set out in the Best Value Planning Method Statement</p>
<p>Adaptive planning</p> <p>Clarity on how WRSE will define the range of adaptive pathways, the thresholds of uncertainty to justify an adaptive plan, as well as scenarios.</p>	<p>WRSE has shared the principles of its approach with stakeholders and hosted a webinar to provide the opportunity for stakeholders to “deep dive” on this topic in response to stakeholder requests. Further details are set out in the Best Value Planning Method Statement.</p>

3 Method/approach

Regulatory and policy matters

- 3.1 WRSE engages with government, regulators, policy makers and the other regional groups through the National Framework Steering Group, Policy Task and Finish Group, Regional Coordination Group and RAPID stakeholder meetings and aims to help shape the regulatory framework to ensure we can achieve a resilient and sustainable water supply for the long term. WRSE also engages with government through wider policy activities such as contributing to policy development and consultations and scrutiny at government committees such as the Public Accounts Committee.

Coordinated planning

- 3.2 The SE regional plan will be the foundation for the member water companies WRMP24s and the regulatory planning timetable has been devised by regulators to facilitate this, with the consultation on the draft regional plans supporting pre-consultation on WRMP24s. The strategic resource options, which are being developed through a gated process overseen by RAPID, will be considered in the draft plans and the timing of the gates are also aligned with the regional plan timeline. Noting this is a complex and inter-related landscape, WRSE is working to ensure that there is a clear line of sight between the activities, that consultations are complementary and joined-up, and that stakeholders are clear about why they are being consulted, the scope is and how it fits with other activities.

Engagement groups and channels

- 3.3 WRSE has set up stakeholder groups and a range of channels to enable stakeholders to remain briefed and have an opportunity to contribute to the development of the regional plan.

- 3.4 The WRSE stakeholder groups are illustrated in Figure 1 and described below:

Stakeholder Advisory Board – This comprises representatives from other sectors from across the region, as well as organisations involved in determining future water policy and strategy. The purpose of the Board is to ensure a broad range of interests are represented and to help shape the direction and

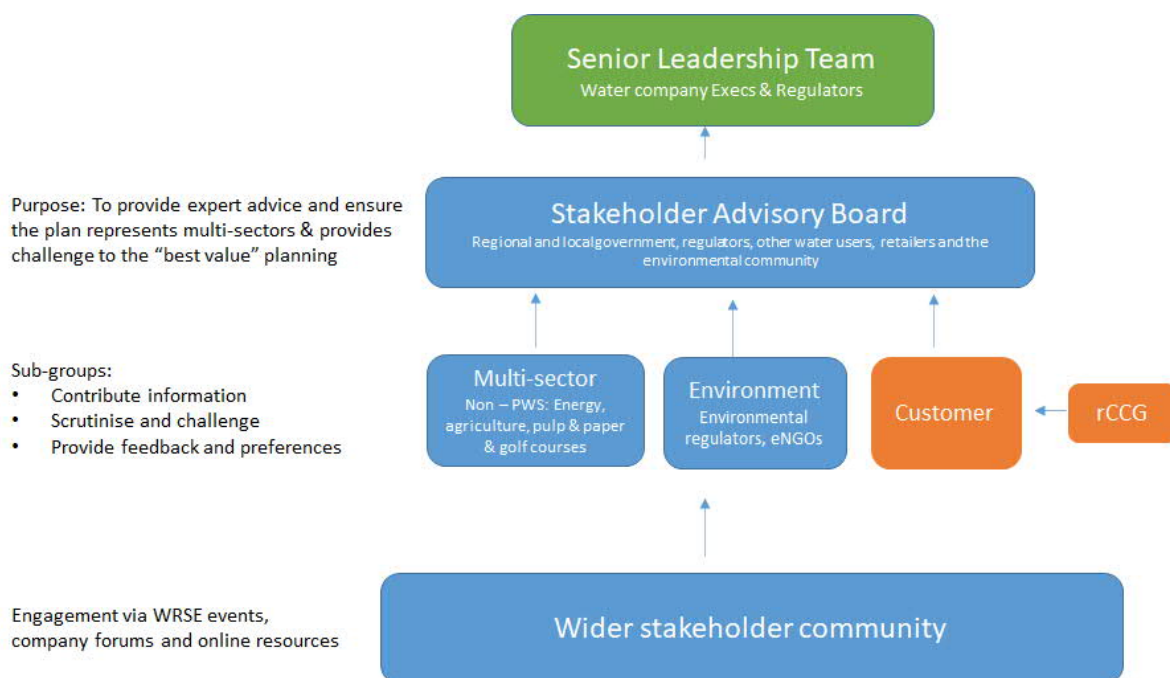
content of the plan. The Terms of Reference were reviewed and approved in March 2021 and the members of the Advisory Board are provided in Appendix 1.

Multi-sector and Environmental Advisory Groups to ensure we understand and take account of the needs of other sectors, the resilience of their water supply system, potential solutions and define the environmental ambition for the region. Each group has an agreed Terms of Reference. The members of these Groups are provided in Appendix 1.

Customers – the views and preferences of water company customers are important in forming the regional plan and we have engaged with customers through research and other channels to understand, and take account of, their views and preferences. We have also established a regional Customer Challenge Group (rCCG) with membership of CCW and representatives for the SE water company Customer Challenge Groups (CCGs) to scrutinise and challenge the design and execution of the engagement with customers. This workstream is covered in more detail in a separate Method Statement on Customer Engagement.

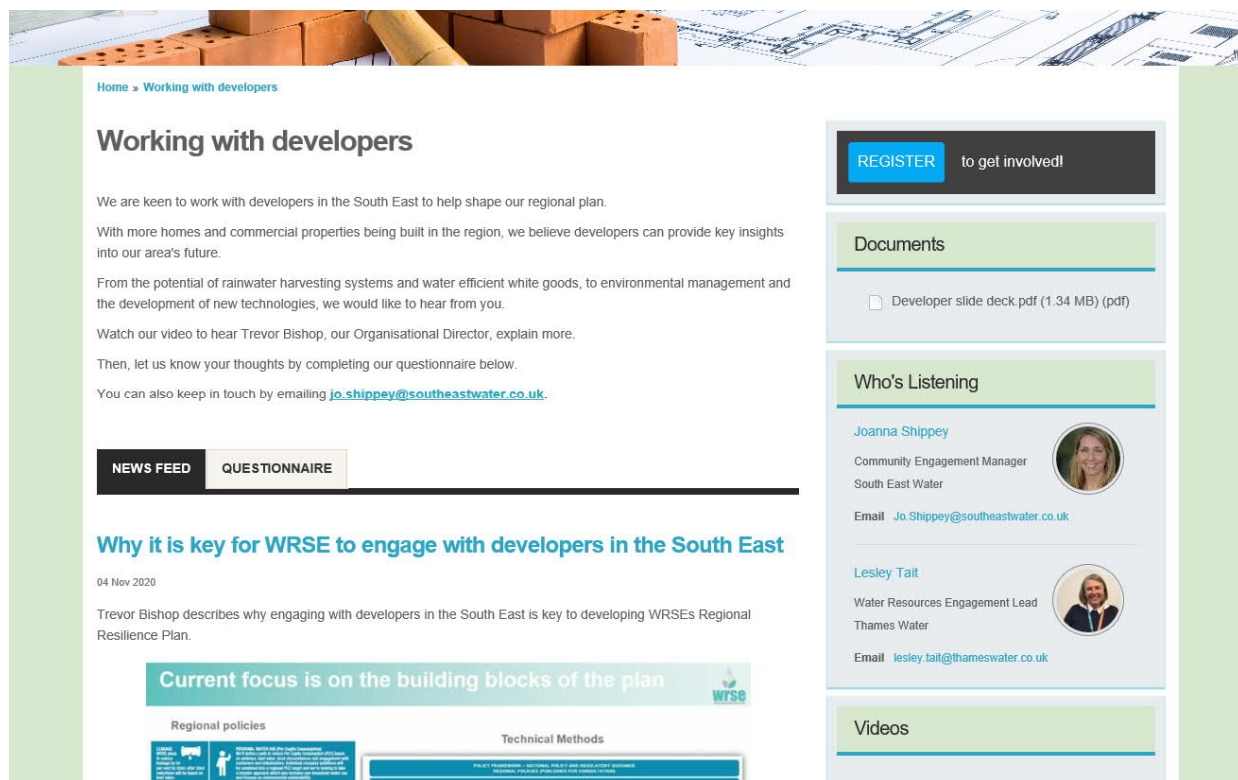
Wider stakeholder community through meetings and events, hosted both by WRSE and the individual water companies, documentation, consultation and online channels.

Figure 1: WRSE engagement framework



3.5 It was the intention to establish a WRSE group to cover business and the economy however the diversity across this sector and the pressures due to the pandemic has meant that it has not been possible to form a sub-group with representatives from this sector. In lieu of this, WRSE has engaged with a range of organisations to share our approach and seek input including Local Enterprise Partnerships, the House Building Federation, Developers and Chambers of Commerce. Figure 2 illustrates a call for engagement with the Developers community.

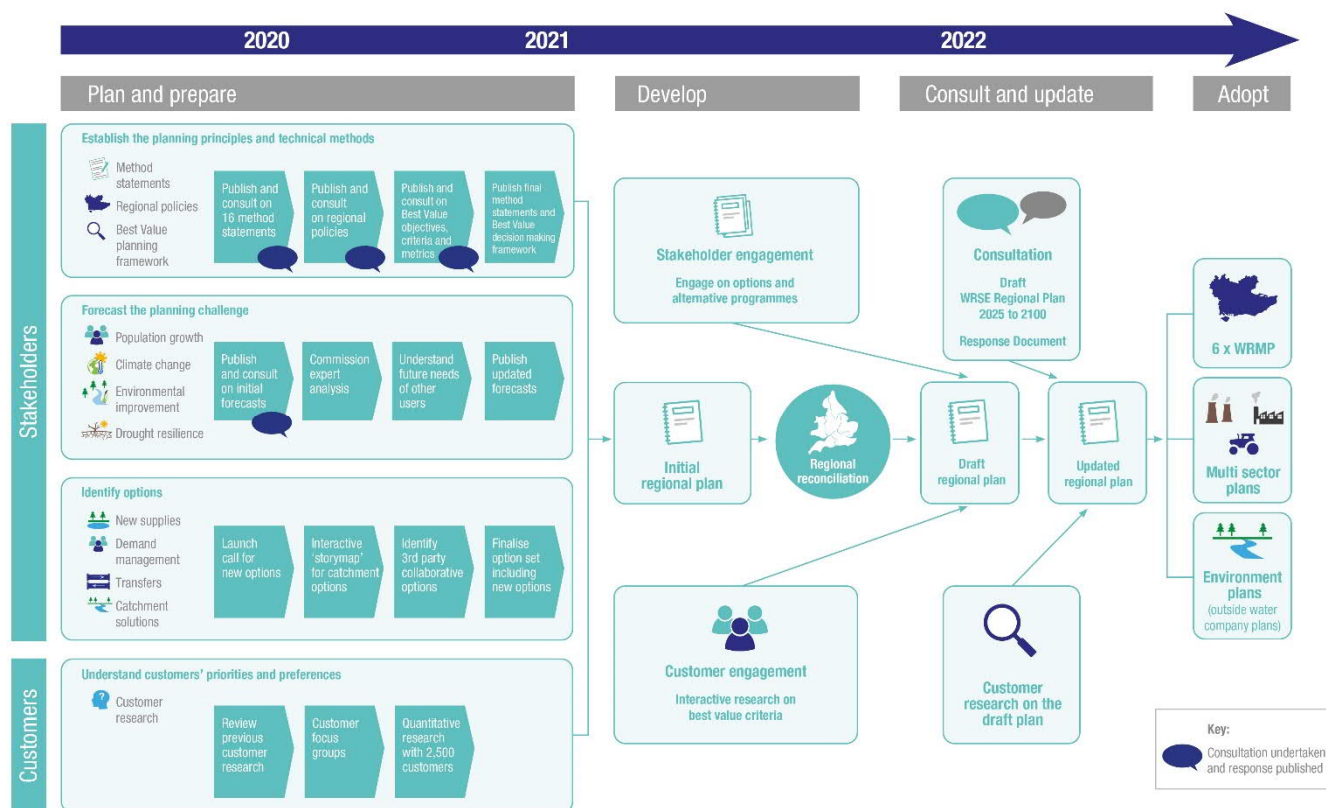
Figure 2: Illustration of engagement with the developer community



Policy and technical workstreams

3.6 WRSE has endeavoured to share the components, or building blocks, of the plan at a formative stage. A summary of the engagement process is shown in Figure 3.

Figure 3 Overview of our engagement process



- 3.7 Recognising there is considerable diversity in appetite, knowledge and capacity, amongst stakeholders we develop “tiered” information from detailed technical reports to blogs, to enable stakeholders to decide the extent to which they engage in the activities. We also have the opportunity to scale up and down activities in response to stakeholders needs and interests.
- 3.8 Where we have sought feedback, we have endeavoured to provide a 4-week period for comment on foundation documents and have committed to respond to feedback within 4 weeks of the closing date of the comment period. We send the response document to all stakeholders who participated in the consultation and publish it on our website. In taking this approach we can demonstrate that we are listening and responding to the views and preferences of the stakeholder community and that the engagement is actively informing the work of WRSE. Consultations have been completed on regional policies, Technical Methods, Strategic Environmental Assessment Scoping Report, the Resilience Framework and the Best Value objectives, criteria and metrics.

- 3.9 We have set up an online engagement platform <https://wrse.uk.engagementhq.com/> to support the engagement work, this provides a “one stop shop” for stakeholders housing all relevant information in one place. It will continue to be expanded as the work progresses, and companies will also publish relevant material on the platform. It also enables WRSE to keep robust records of stakeholder interaction.
- 3.10 There is also stakeholder input managed as part of the technical workstreams for example the work to understand and explore catchment solutions includes engagement with stakeholders. This will be tracked and presented in relevant Method Statement and technical reports to ensure all stakeholders have an opportunity to understand the discussions and outputs.
- 3.11 We will prepare a report, the Stakeholder Engagement Report, which will be part of the draft regional plan, and will set out the approach applied and how the engagement activity has helped to input to, and shape, the plan development.
- 3.12 We published the emerging plan in January 2022 for comment, and will publish the draft regional plan in November 2022 for further public consultation. These are not a statutory consultation because regional planning is not currently part of the statutory planning process for water resources, but we are intending to follow best practice as far as feasible within the timeline. We will design an engagement programme to ensure it is accessible to interested customers, communities and technical stakeholders and will produce a formal response to the consultation, this will not be in the format of a statutory Statement of Response, but will clearly summarise the key issues raised, and our consideration and response.
- 3.13 Companies' WRMP24s will be closely aligned with the regional plan. It will be important for the companies to clearly set out this alignment, and any changes or deviations from the regional plan and the reason for this, in their WRMP24s. This will aid stakeholders to maintain a line of sight through the stages of engagement and consultation. Companies will manage the statutory consultation on their draft WRMP24s in line with legislation.
- 3.14 A log of the engagement completed to support the draft regional plan and draft WRMPs is presented in the Stakeholder Engagement Report.

4 Summary

- 4.1 Water Resources South East (WRSE) is developing a multi-sector, regional resilience plan to secure water supplies for the South East until 2100. We are taking a long-term view and considering the water we need to use at home and at work, as well as that required by agriculture, to generate electricity, for industry, recreation, the environment and to support the well-being of society.
- 4.2 Stakeholder engagement is an important part of developing the South East (SE) regional plan and water companies respective WRMP24s. We want to understand and take account of stakeholder's priorities and preferences in developing a balanced regional resilience plan which ensures a secure water supply for customers and other water users, whilst protecting and improving the environment.
- 4.3 In this stakeholder engagement Method Statement, we have set out the approach through which we will engage with a wide range of groups, organisations and interested parties. We will do this via an established engagement programme to make sure our activity is coordinated, inclusive and effective.
- 4.4 Our approach will evolve both in response to strategic and technical developments and also feedback from stakeholders. We will endeavour to clearly communicate with stakeholders and keep them briefed on the engagement and technical programmes of work, and we will update this Method Statement periodically to ensure it remains current.

Appendix 1 – Membership of WRSE stakeholder groups

Members of the Stakeholder Advisory Board, the Multi-sector Advisory Group and the Environment Advisory Group are presented here. Note this is correct as of November 2022.

Stakeholder Advisory Board

Chair: Trevor Bishop

Members of each of the sub-groups:

Multi Sector Chair: Alan Turner, formerly Kent County Council

Multi sector member: Andy Moores, RWE Generation UK

Environment Panel Vice Chair: Charles Rangely Wilson, Chalk Streams First

rCCG: Karen Gibbs, CCW

Local Gov.: Sean McKee, South East Councils and Daniel Bicknell, GLA

Regulators invited as observers

Refreshed Terms of Reference:

The WRSE Advisory Board will work with the WRSE senior leadership team (SLT) to ensure that the multi-sector, regional resilience plan meets the needs of all water users, the environment and supports the regional economy. Specifically, the members of the group will:

- *Contribute to the development Best Value plan criteria and metrics and provide and advise the SLT on whether the chosen criteria reflect the needs of all water users*
- *Review the updated Future Water Resource Requirement assessment (demand and supply forecasts) and advise SLT on whether it reflects the needs of all water users based on the engagement and technical work carried out*
- *Contribute to the development of the visualisation tool that will be used for stakeholder and customer engagement on the alternative water resource programmes that are developed*
- *Review and assess the engagement carried out using the visualisation tool and provide a report to SLT on how the different plans perform from a customer and stakeholder perspective*
- *Review and assess the draft plan consultation results and make recommendations to the SLT on changes that should be made to the plan to reflect customer and stakeholder views*
- *Partner with WRSE, and its member companies where appropriate, to promote the development of the regional plan and WRSE's wider objectives.*

Environmental Advisory Group

Chair: Trevor Bishop (replaced Richard Benwell in March 2021)

Members:

- Sarah Perry – Herts and Middlesex Wildlife Trust
- Ali Morse – Blueprint for Water
- Barry Bendall – The Rivers Trust
- Tom Perry – Environment Agency
- Louise Bardsley replaced by Kate Chandler– Natural England
- Charles Ranglely Wilson – Chalk Streams First
- Yvette de Garis, Thames Water
- Nick Price Southern Water
- Emma Goddard, South East Water

Terms of Reference

- To advise WRSE on environmental scenarios – looking beyond the statutory minimum.
- To advise and inform on the process of setting of environmental ambition beyond the statutory minimum by reviewing the current evidence, future challenges against the needs of the environment using agreed scenarios
- To advise on WRSE environmental policy and be part of the environmental assessment method consultations.
- To provide a review of potential environmental solutions.
- To provide independent advice to the Senior Leadership Team (CEO/senior regulators) group.

Multi-sector Advisory Group

Chair: Alan Turner formerly Kent County Council

Members:

- Kelly Hewson-Fisher, NFU
- Andy Moores, RWE
- George Day – Uniper Energy
- Jo Scott, DS Smith
- Debbie Stringer, Confederation of Paper industries
- Tony Hanson, Environmental Solutions International / BIGGA / England Golf
- John Hall, West Sussex Growers
- Nicola Owen, Mineral Products Association
- Kane Horton, Canal and Rivers Trust
- Alison Matthews, Environment Agency
- Leah Matteus-Collins, Vitacress
- Energy UK

Terms of Reference

- Understand the future requirements of non-public water supply users to be included in the WRSE regional resilience plan
- To establish a framework for assessing the resilience of the non-PWS system within the regional resilience plan
- To advise on sector-specific policy issues and technical processes that need to be considered as the regional plan is developed
- To identify opportunities for new water resource options and shared resources that could be promoted through the regional plan and understand the full range of solutions that could potentially be helpful for non-public water supply users, including funding arrangements
- To create a forum for ongoing collaboration to deliver improved water management across the South East (water efficiency, sustainable abstraction, drought management etc)
- To provide independent advice to the Senior Leadership Team (CEO/senior regulators) group.