

WRW RESPONSE TO WCWR'S EMERGING PLAN CONSULTATION

Background

Water Resources West is one of the five regional planning groups working alongside West Country Water Resources to develop plans for the water resources needs of our country. We are a group of water companies and other abstracting sectors working together across the North West, the Midlands and the cross-border catchments with Wales. As such we share a common border with West Country Water Resources (WCWR). We therefore welcome opportunity to engage with this consultation.

This response relates only to matters of working between regions. We think it is important that each regional plan reflects the distinctive nature of each region and local priorities. We therefore leave matters of detail within the WCWR region for local stakeholders to respond to.

Collaborative Working between Regions

We wish to thank WCWR for working collaboratively with us and the other regions, through the Regional Coordination Group and the reconciliation process. This is the first time five regional groups have worked together to produce joined-up plans, and the publication of the emerging draft plans is a substantial achievement which should be recognised. As our recent lessons learnt exercise, supported by Newcastle University, has shown: all five regions have worked effectively and agreed a joined-up national plan. We want that to continue through the next phase of developing our regional plans. Together we have an opportunity to build on the lessons learned so far through the process in a second reconciliation.

We therefore encourage West Country Water Resources to continue working collaboratively with us.

Of particular importance is the second reconciliation. This second reconciliation is the means by which the strategic (i.e. large or inter-regional) schemes should be selected consistently in our draft plans, i.e. the same dates and volumes are proposed in both sets of plans. This is particularly important because draft regional plans must¹ be reflected into the water companies draft WRMPs and the WRMPs should have an assurance statement from the company board that the plan is a best value plan for managing and developing the company's water resources². This means that we need to work together in reconciliation to develop evidence that any transfers between WRW and WCWR can be included in the WRMPs our members as part of best value plans that their boards can assure.

The regulatory timetable for producing the draft plans is also relatively tight, with just a few months to produce the plans and have them assured.

Our principal asks of WCWR are therefore:

- To agree the scope, timetable and mechanisms of the second reconciliation with the other regions in advance of this process starting
- To provide us with clear and timely information through the reconciliation, in accordance with what has been agreed between the regions
- To include a clear articulation of timing, volumes and utilisation of transfers between WRW and WCWR in your draft plan, consistent with the outcome of the second reconciliation.

¹ [Appendix 2 of the Water Resources National Framework](#), Environment Agency, March 2020.

² Section 1.5 of the [Water Resources Planning Guideline](#), Environment Agency, Natural Resources Wales and Ofwat, July 2021.

We commit to doing the same in return.

Transfers between WRW and WCWR

Both our emerging draft plans highlight the potential use of the River Severn and supporting options to meet needs in the West County, and the interdependence on the Severn Thames Transfer. This scheme could benefit WCWR in two different ways:

1. Part of the additional water made available in the River Severn could be allocated to meeting a need in the West Country.
2. Additional water in the Severn allocated to other needs (e.g. in the South East or Midlands) could be used to benefit the West Country at times when it is not needed by the primary recipient. This is feasible because the utilisation of the STT scheme by WRSE is expected to be relatively low, and there are times when the West Country is in drought but the South East is not.

WRW remains committed to working with WCWR to progress the development of these options and to work with you on the appraisal of them for the draft plans. The second reconciliation will help us understand the competing needs for the options affecting the Severn. Please let us know if you require further information from us to allow you to appraise these options.

Minor Point of Inconsistency

We have spotted that the map shown in Figure 1 of your emerging plan contains out of date boundaries of Water Resources West. The current boundaries are shown to the right. We trust that this will be reflected in your draft plan and would be happy to provide shapefiles if this would help.

Conclusion

WRW welcomes the collaborative working we have had with WCWR and the reflection of that in WCWR's emerging plan. We are committed to the continuation of the collaborative working for the draft plans. We expect that WCWR will make a similar commitment, particularly in respect of the second inter-regional reconciliation.

