



Appendix B

Draft Regional Plan - Table of feedback comments and our responses
Theme: Best Value Planning and Decision Making



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Blueprint for Water	Best Value Plan (BVP) and decision making	We have some concerns that stakeholders may struggle to meaningfully engage with the full content of the plan. The plan appears to include a number of errors that make understanding difficult in places, for example the references made to a future 'updated draft summer 2022 plan' within the document. These errors should be addressed before publication of the final plan.	West Country Water Resources (WCWR) propose to alter the Final Regional Plan structure to improve readability.	The Final Regional Plan documents will be re-designed, and their accessibility improved before submission.
Bristol Avon Catchment Partnership	Best Value Plan (BVP) and decision making	Understood the plan	Thank you for your comment.	No change proposed.
Bristol Avon Catchment Partnership	Best Value Plan (BVP) and decision making	We are broadly in agreement with the conclusions and agree with the next steps. We would be pleased if the WCWR regional group and water companies work increasingly in partnership with the BACP and its partners moving forwards.	West Country Water Resources (WCWR) would welcome further collaboration with the Bristol Avon Catchment Partnership.	No change proposed.



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Bristol Avon Catchment Partnership	Best Value Plan (BVP) and decision making	<p>We are particularly keen to see certain sections of the supplementary report re-worded to reflect the current aims and ambitions of the BACP, specifically with the mention of the BACP in the Bristol Avon Rural section. There are many points within this that do not reflect or align with the current Partnership ambitions. These include:</p> <ul style="list-style-type: none">- On page 26, the BACP's highest priorities are incorrectly outlined. These should reflect the aims in our Catchment Plan, which are: Enhance people's enjoyment and connection with the water environment; Improving Water Quality; Restore biodiversity and ecological connectivity; Adapt and build resilience to a changing climate.-On page 27/28, there is reference to many of the projects the BACP supports. We would be keen for there to be reference to our Catchment Delivery Framework here. The Framework provides a coordinated and focused approach that includes all evolving Partnership Programmes and Projects across the catchment. The Framework enables us to clearly communicate and advocate where investment should be prioritised within	<p>West Country Water Resources (WCWR) will take these comments onboard and make the required alterations to the references made to the Bristol Avon Catchment Partnership and its work.</p>	<p>Changes to Bristol Avon Catchment Partnership references.</p>



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		<p>the catchment. For more detail on this, please see our Catchment Plan or contact us if there is any uncertainty.</p> <p>-On page 33, in the table there is the line: “Low flow resilience not explicitly a goal in the Bristol Avon Catchment Plan. Add in goal for the BACP to work towards in a collaborative way.”. It is not clear who this is an action for. If it is an action for the BACP, this would need to be agreed with our Steering Group and partners before being published in this way. We would welcome a conversation about around this point with the West Country Water Resources Group.</p>		
Bristol Avon Catchment Partnership	Best Value Plan (BVP) and decision making	<p>National Framework Water Reduction Targets: As with both of the draft WRMPs for the Bristol Avon Catchment Partnership area we wonder if there is potential to add more detail on how this ambitious target can be met. This, as with the WRMPs, could focus on water-use education and public information campaigns alongside enhanced metering/smart metering. Is there potential to have a regional wide plan on joint communication and water-use education?</p>	<p>West Country Water Resources (WCWR) is committed to understand how demand management strategies can be improved and advanced within the region and will include greater detail on the options outlined within the Final Regional Plan.</p>	<p>The options selection process will be further highlighted within the Final Regional Plan.</p>



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CLA	Best Value Plan (BVP) and decision making	Finally, it is hard for individual farmers and other rural abstractors to make sense of what the plan means for them in its current format. The CLA would like to see the final plan and associated website highlight where land managers can access data and information to make investment decisions. This data should be digestible, relevant, and empower rural businesses to participate within the plan’s goals.	Readability and useability by all sectors is a challenge we recognise and we will endeavour to make the Final Regional Plan more readable. Providing detail at each catchment or sub-catchment level is not possible at this planning stage.	Suggest section added to the Final Regional Plan within the non-public water supply section that gives more reference to farm water needs and abstraction.
Devon Wildlife Trust	Best Value Plan (BVP) and decision making	In summary, and with specific reference to SWW’s Draft Water Resources Management Plan 2025-2050, we would urge you to include the following: <ul style="list-style-type: none"> • Set out the environmental needs first of each drinking water catchment • Set targets for reducing abstraction from sensitive areas • Commit to 20% gain in biodiversity, supporting Local Nature Recovery Strategies • Include the impact on carbon emissions of alternative sources of water supply • Set targets for reductions in non-household consumption and measures to support this • Include reference to multiple benefits delivered by nature based solutions and build the evidence base • Be more vocal on tighter water 	The Final Regional Plan will reflect the regions' water companies Water Resource Management Plans (WRMPs), these plans will strive to deliver the challenging targets set out by the government and where possible the West Country Water Resources (WCWR) will look to stretch the ambition of the water companies to deliver more for the South West region.	No change proposed.



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		efficiency standards for new developments.		
Devon Wildlife Trust	Best Value Plan (BVP) and decision making	Good value long term is about investment now. Solving the leaks, investing in new 'self heal' technology and the many other efficiencies that can be gained from technology and modern equipment as well as a whole range of nature based solutions in the near future will save costs in the longer term.	Companies within the West Country Water Resources (WCWR) are focused on using the most innovative techniques alongside the tried and tested methods to ensure the long term targets are met, whilst mitigating impact to the environment and providing the customer with the best value.	No change proposed.



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Devon Wildlife Trust	Best Value Plan (BVP) and decision making	It is critical that all abstractions meet the requirements of the Habitats Regulations and Water Framework Directive at a minimum to protect the fragility of our water systems.	West Country Water Resources (WCWR) will ensure all proposed options within the Final Regional Plan conform to Habitats Regulations Assessments (HRA) and Water Framework Directive (WFD).	Inclusions of assessments for Water Framework Directive (WFD) and Habitats Regulations Assessments (HRA) within the Final Regional Plan.
Environment Agency	Best Value Plan (BVP) and decision making	We consider WCWR's draft regional plan narrative does not fully demonstrate it will meet the region's water needs, protect and enhance the environment, or reflect the needs of other sectors in the short and long-term. The draft regional plan falls below our expectations and requires considerable further work. Whilst we don't consider that WCWR has fully delivered on all objectives of the National Framework, the group's first regional plan signals the start of step change in how water is better planned for, valued, and used. The draft plan adds some value to the existing WRMP process but there is limited evidence of collaboration at a regional level in the version consulted upon.	West Country Water Resources (WCWR) thanks you for your comment.	No change proposed.



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Environment Agency	Best Value Plan (BVP) and decision making	WCWR did not submit its draft regional plan to the agreed timetable or in step with other regional groups, and did not submit any technical reports, including associated SEA's and HRA's, to support its draft regional plan consultation. Furthermore, the supporting data tables were significantly delayed due to errors. This has likely affected the ability of consultees to assess its proposals and better understand wider aspects of the regional plan that are not considered within water company WRMPs. For its final plan, we expect WCWR to submit comprehensive supporting evidence to help demonstrate how its preferred plan provides best value to the region and is adaptive to key uncertainties.	West Country Water Resources (WCWR) will include the relevant supporting technical appendices for the Final Regional Plan submission, including a demonstration of how the selected options meet Best Value Planning within its preferred plan.	The inclusion of supporting technical appendices within the Final Regional Plan submission.
Environment Agency	Best Value Plan (BVP) and decision making	The draft regional plan also does not consider or demonstrate compliance with the newly published Environment Act target 3.	West Country Water Resources (WCWR) will address the Environment Act target 3 within the Final Regional Plan.	Inclusion of compliance statement for target 3 of the Environment Act (SI No 93 (2023)).
Environment Agency	Best Value Plan (BVP) and decision making	The WCWR draft regional plan has multiple inconsistencies with draft WRMPs that were recently consulted on. The supporting data tables presented with the draft regional plan are also inaccurate, inconsistent with WRMP datasets, and inconsistent with the draft plan narrative.	West Country Water Resources (WCWR) shall ensure final data sets are aligned across the region and convey one coherent narrative upon the Final Regional Plan submission.	Ensure the consistency of options through the Final Regional Plan and the Water Resource Management Plan (WRMP) process for the final submission documents.



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Environment Agency	Best Value Plan (BVP) and decision making	Ensure supporting public water supply data tables are consistent with WRMP data tables for all metrics and regional level summary information.	For the final submission of the plan West Country Water Resources (WCWR) will ensure that data tables contain consistent metrics and data for the region.	Data table consistency.
Environment Agency	Best Value Plan (BVP) and decision making	We acknowledge that WCWR is a newly established regional group and has faced significant challenges during 2022, impacting the regional plan delivery. Whilst we recognise that the regional group has undertaken a substantial amount of work to get to this point, we consider that minimal progress has been made in the past year. WCWR has not well-reflected the significant work it has undertaken over the past few years across many sections of its draft regional plan. This is a missed opportunity to present the positive work and improvements that regional collaboration has delivered in the West Country.	Thank you, West Country Water Resources (WCWR) aims to capture the ongoing work that has been undertaken across the region and provide this within the Final Regional Plan.	Update of Final Regional Plan to reflect ongoing work across the region.



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Environment Agency	Best Value Plan (BVP) and decision making	We have assessed the public water supply parts of the supporting regional plan data tables that were submitted as part of the regional plan against relevant water company draft WRMP data tables. We found that some water balance components were poorly aligned and in places calculated incorrectly within the regional plan dataset.	Thank you for your comment, it is noted and further work to ensure a consistent set of data tables for both the Final Regional Plan and Water Resource Management Plans (WRMPs) will be submitted.	Improved data table consistency between Regional and Company Water Resource Management Plans (WRMPs).
Environment Agency	Best Value Plan (BVP) and decision making	Within the resource zone tables, there is inconsistency and inaccuracy in the representation of baseline supply reductions, drought measures and preferred options. Because of these issues, the regional level summary data and supply-demand balance also appears inaccurately calculated with several metrics incorrectly derived.	Thank you for your comment, it is noted and further work to ensure a consistent set of data tables for both the Final Regional Plan and Water Resource Management Plans (WRMPs) will be submitted.	Improved data table consistency between Regional and Company Water Resource Management Plans (WRMPs).
Environment Agency	Best Value Plan (BVP) and decision making	These issues cause the representation of public water supply-demand balance to be incorrect and/or inconsistent with the corresponding data presented through the recent draft WRMP consultation. This must be addressed in the final regional plan and the Environment Agency will be pleased to provide guidance to WCWR where needed to ensure that its regional plan supporting data tables are accurate and consistent with WRMP data submissions.	West Country Water Resources (WCWR) will reach out to the Environment Agency to obtain guidance on how to better represent the public water supply balance within the Final Regional Plan and align the regional plan more closely with the Water Resource Management Plan (WRMP) process.	Update to the supply demand balance within the Final Regional Plan.



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Environment Agency	Best Value Plan (BVP) and decision making	We are disappointed that it has not delivered a draft regional plan that is consistent with relevant WRMPs. This inconsistency reduces the effectiveness of the consultation and understanding of the overall regional plan and has resulted in a draft regional plan that is not regionally coherent.	West Country Water Resources (WCWR) will ensure consistency within the final plan across itself and the Water Resource Management Plans (WRMPs) that are produced by Bristol Water, South West Water and Wessex Water.	Further development of a consistent reporting approach from Water Resource Management Plans (WRMPs) into the Final Regional Plan submission.
Environment Agency	Best Value Plan (BVP) and decision making	Best Value Plan: We support WCWR's approach of planning for 'low regrets' investment in the early years of the plan that is outlined in section 8.3.1 of the draft regional plan. However, we have concerns over the scale and timing of what is considered 'low regrets'. Based on the current range of scenarios in the draft regional plan, WCWR can and should plan with confidence to meet its least challenging environmental destination scenario, BAU+, which requires 180Ml/d to meet environmental needs. Page 60 of the draft regional	Since the production of West Country Water Resources (WCWR) Draft Regional Plan, WCWR have together with the host companies reviewed the list of supply options and additional option have been identified. These are now included within the relevant draft Water Resource Management Plans (dWRMPs) for internal supply demand balances to be produced within their final plans.	These changes will be drawn from the Water Resource Management Plan (WRMP) publications to be integrated into the Final Regional Plan.



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		plan mentions 100 MI/d, which would clearly be insufficient when compared to the predicted scale of environmental need in 2050.		
Environment Agency	Best Value Plan (BVP) and decision making	WCWR must update their assessment of a plausible low level of current requirements by ensuring that the timings of abstraction reductions are programmed in to meet the obligations of the Habitats Regulations (2017) and the WFD Regulations (2017).	West Country Water Resources (WCWR) will update our plausible low level of current requirements and follow the Habitats Regulations Assessment (HRA (2017)) and the Water Framework Directive (WFD) Regulations (2017).	Update to the methodology for conforming to the Habitats Regulations Assessment (HRA) and Water Framework Directive (WFD) regulations to be made within the Final Regional Plan.



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Environment Agency	Best Value Plan (BVP) and decision making	In our view, investments delayed until the long-term delivery phase should only be those that have low certainty of need. The criteria a) and b) set out on page 62 of the draft regional plan aren't fully compatible with the criteria set out in environmental legislation (see appendix). We suggest the low certainty need comprises the climate change element of environmental destination and less certain water needs, for example the additional requirements of the enhanced scenario compared to the BAU+ scenario. Based on the current WCWR scenarios this is an additional 21MI/d (however as noted below, we recommend that this figure is reviewed).	Thank you, your comment has been noted.	No change proposed.
Environment Agency	Best Value Plan (BVP) and decision making	We strongly encourage WCWR to take action to resolve these issues to present a consistent, unified, and well evidenced final regional plan and better enable stakeholders to understand the plan's outcomes and proposals, especially the preferred suite of options chosen within the best value planning framework.	West Country Water Resources (WCWR) aims to produce a Final Regional Plan that will provide a unified representation of the options needed across the planning horizon.	Further alignment of the Water Resource Management Plans (WRMPs) and Final Regional Plan submission.



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Environment Agency	Best Value Plan (BVP) and decision making	Compliance with the SEA Regulations 2004 is a legal requirement, and this is a significant omission by the regional group and must be resolved for the final plan. This must include evidence that the timing and benefits of all demand and supply options represent best value for the region and that any decision to defer or delay delivering options is justified and does not put the environment and security of supply at risk. WCWR should ensure a SEA and HRA are being produced for the final regional plan if required. If an SEA or HRA isn't being undertaken, a copy of the screening detail be provided to the Environment Agency and other regulators for review.	West Country Water Resources (WCWR) will include its Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) for the Final Regional Plan submission in a technical appendix.	Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) appendix to be added to the Final Regional Plan submission.
Environment Agency	Best Value Plan (BVP) and decision making	Although SEA and HRA are being undertaken on the individual water company WRMPs, this does not automatically negate the need to undertake one at the regional plan level. WCWR should work with the water companies promoting individual supply options to identify further mitigation/compensation opportunities to reduce the risk that the schemes will cause adverse effects. This will help to ensure the options can secure necessary permissions to enable them to be delivered in a timely way. The RAPID	West Country Water Resources (WCWR) has taken a bottom up approach to producing its Draft Regional Plan, no options have been developed by WCWR and fed downstream. Therefore, the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) will be collated and provided within an appendix in the Final Regional Plan.	Appendix to be produced for the Final Regional Plan for the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA).



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		Gate 2 guidance indicates that relevant work for the Strategic Resource Options should inform the water company WRMP and regional plan SEAs and not have an SEA for the SRO itself.		
Environment Agency	Best Value Plan (BVP) and decision making	Beyond the best value metrics developed with the input of wider stakeholders, it is difficult to assess which outcomes of the regional plan provide specific benefit to wider water users. Setting out a best value plan for the region that considers and delivers benefits to wider groups of water users are important outcomes of the regional planning process and we are disappointed that the WCWR draft regional plan has not fully delivered these aspects in the documents it has consulted on.	Until the Regional System & Investment Model is built a true Best Value Plan will not be possible, but we will endeavour to use all three Water Resource Management Plans (WRMPs) to develop the best plan possible with the information we have.	No change proposed.



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Environment Agency	Best Value Plan (BVP) and decision making	We note concerns from water companies over the affordability of investing in the environmental destination. Below we set out two additional reasons (in addition to the legislative requirement outlined above) why we believe it is right to invest in the Environmental Destination now and why delaying investment won't lead to the best value solution: Public Support – Resolving flow issues in our rivers provides significant benefits for people and the environment. Water company customers support delivering environmental improvements and the societal expectations are increasing for rapid resolution. The case for delaying whilst further investigations happen is only a sound argument where there is genuine uncertainty that any actions is required. If scenarios indicate that some sustainability reductions are likely to be needed in a WRZ, then we expect to see prompt action to resolve at least the lower bounds of the likely water need. These ambitions are also supported by the government's 25-year Environment plan goal of clean and plentiful water. Sound investment - A 2018 report by the National Infrastructure Commission (NIC) demonstrated that the cost of inaction (£40bn) would be much greater than	Thank you, your comment has been noted.	No change proposed



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		<p>the cost of building resilience (£21bn). Action to increase resilience can be considered low regrets because increased resilience will be required in the not-too-distant future under all scenarios (the uncertainty is over when, not if). Delaying action to improve resilience can therefore be considered a high-risk strategy that will:</p> <ul style="list-style-type: none">• limit the opportunity to improve the environment and means that any benefits will not be realised until later.• diminish the ability to spread the cost of implementation over a longer period, leading to potential significant future hikes in customer bills.• facilitate the continuation of an approach that requires short term interventions that increases the risk to the security and cost of supply.		



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Historic England	Best Value Plan (BVP) and decision making	Historic England is extremely concerned that for some preferred options, heritage impacts are described which may amount to ‘substantial harm’ or ‘total loss’ against the tests in national planning policy. This is particularly notable in relation to pipeline transfers and Scheduled Monuments. It should therefore be noted that any works that would pass through scheduled areas would, under the 1979 Ancient Monuments and Archaeological Areas Act, require Scheduled Monument Consent and there is no guarantee DCMS would grant this. Water companies should seek to route any pipelines or other infrastructure outside of Scheduled Monument boundaries; typically we would recommend that a reasonable buffer is allowed, subject to the results of further archaeological investigation.	West Country Water Resources (WCWR) will ensure that any developments shall route pipelines or other infrastructure outside of Scheduled Monument boundaries leaving a sufficient buffer.	No change proposed.
Historic England	Best Value Plan (BVP) and decision making	A related point is that, within the assessment of heritage impacts limited consideration has been given to unknown and non-designated heritage assets. It is important that the water companies are aware that where non-designated archaeology is found that is of equivalent significance to a scheduled monument, both NPPF footnote 68 and paragraph 4.8.5 of the NPS provide the same level of policy	Thank you, West Country Water Resources (WCWR) will ensure this is considered at the construction planning stage.	No change proposed.



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		protection to that archaeology as to a designated heritage asset.		
Historic England	Best Value Plan (BVP) and decision making	We also consider that 'best value planning' should explicitly account for heritage (see section 2 below). In drawing up schemes, water companies should be seeking not just to minimise harm to the significance of heritage assets and their settings, but to make a positive contribution to the historic environment where opportunities exist. In this regard, in relation to nationally significant infrastructure the NPS (paragraph 4.8.9) suggests considering measures to enhance the significance of heritage assets, and to address heritage assets that are at risk, amongst other things. We also suggest that the concept of Environmental Destination could be beneficially broadened to include the historic environment as well as the natural environment.	West Country Water Resources (WCWR) will work with all the companies to ensure Historic England are suitably consulted throughout and any opportunities to improve the Historic Environment will be reviewed and where possible implemented.	No change proposed.



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Historic England	Best Value Plan (BVP) and decision making	We support the principal of a best value plan, whereby decisions are made based not solely on cost but with consideration of other factors such as benefits to customers, the environment and society.	West Country Water Resources (WCWR) will strive to develop a truly regional approach aligning Bristol Water, South West Water and Wessex Water to ensure a Best Value Plan can be implemented. The start of this will be the development of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	No change proposed.
Historic England	Best Value Plan (BVP) and decision making	Within the Regional Plan, best value planning is based on the three outcomes of: 1) Improve the environment, 2) Ensure water supply resilience, 3) Deliver societal benefit. The concepts of environmental improvement and societal benefit both provide scope to take account of heritage impacts and enhancements in the decision-making process. However, at present, while the former focuses on the natural environment / reduced abstraction, the latter seems to focus primarily on reduced costs and customer usage.	The Final Regional Plan will look to expand its remit to encompass both the Natural and Historic environment while delivering on its Regional remit.	No change proposed.



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Historic England	Best Value Plan (BVP) and decision making	While we are supportive of these outcomes, we consider that the metrics (Table 6) associated with outcome 1 could explicitly highlight the opportunity to safeguard historic landscapes and buried archaeological or paleoenvironmental remains through sustainable abstraction. We also consider that outcome 3 could incorporate conservation, enhancement and public access to heritage assets including Heritage at Risk. This may, for example, include reference to the avoidance of adverse impacts through careful siting of pipelines and infrastructure, or enhancements to water related infrastructure such as historic canals, with potential to attract positive scores within the best value framework.	Any proposed development will ensure that archaeological and historical heritage assets are not disrupted within future options development. However, these concerns would be further addressed within the individual development construction plans. A stakeholder strategy is being developed to ensure that engagement occurs at the relevant stages of project development.	No Change Proposed.
Horticultural Trade Association	Best Value Plan (BVP) and decision making	Lack of funding or high capital costs, plus difficulty in gaining planning permission for larger reservoirs, are the greatest barriers to horticultural businesses being able to increase their water storage capacity and reduce reliance on mains water.	West Country Water Resources (WCWR) are supportive of working with non-public water users to secure new water resources across the region.	No change proposed.



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Horticultural Trade Association	Best Value Plan (BVP) and decision making	Many also rely on boreholes for abstraction and face these licences being changed or revoked. Businesses need more forewarning of changes or revocation of abstraction licences to afford them time for advanced planning.	West Country Water Resources (WCWR) understands the position of horticulturalists but does not hold any decision over abstraction licences.	No change proposed.
Horticultural Trade Association	Best Value Plan (BVP) and decision making	This Draft West Country Water Resources Plan provides a unique opportunity for the government, industry and water companies to collaborate on the planning and delivery of long-term water resilience. Environmental horticulture has a pivotal role to play in meeting the government’s environmental targets and the importance of water security has long been recognised by the sector. In order to deliver other environmental services and further reduce stress on local water networks, the value and specific needs of the sector need to be recognised and funding pots made available accordingly. We look forward to working with you to support our shared ambition to maximise the efficiency of our water use.	West Country Water Resources (WCWR) welcomes further collaboration with the Horticultural sector and would welcome collaborative work towards exploring available funding for the sector to improve its water resilience.	No change proposed.



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Inland Waterways	Best Value Plan (BVP) and decision making	We encourage water resources planners to consider the much broader, long-term environmental, societal and economic benefits waterways can provide. These benefits include: - Increased spend in the local economy: A 2011 report for Defra found that each mile of inland waterway contributes between £175,000 and £1,175,000 a year to the local economy. This needs to be factored into any “Best Value” calculations. - Improved health and wellbeing - they can open up multiple opportunities for outdoor activities such as walking, running, cycling, fishing, sailing, canoeing, paddleboarding and volunteering.	West Country Water Resources (WCWR) is expanding its outlook to encompass a wider group of influencers within the South West to ensure that as much benefit can be factored into the Final Regional Plan. We recognise the benefit of capturing input from as many different groups and organisations as possible to ensure we have a fully consulted plan.	No change proposed.
NFU	Best Value Plan (BVP) and decision making	We welcome the aim of WCWRG to balance the needs of the environment alongside public water supply, energy and agriculture to help build a long term multi sector plan that reflects the diverse needs of the region and helps to increase connectivity and water resource availability	Thank you for your comment.	No change proposed.



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NFU	Best Value Plan (BVP) and decision making	A proper and secure funding mechanism must be established for the agricultural sector.	Discussions should be held with Department for Environment, Food and Rural Affairs (DEFRA) concerning the funding mechanisms and barriers to the agricultural sector, West Country Water Resources (WCWR) would be in full support of such options being developed by local famers and agricultural groups.	No Change Proposed.
NFU	Best Value Plan (BVP) and decision making	The NFU asks that the WCWR Regional Plan looks to to fully explore the financial implications (capital and operational costs) of the options available to the agricultural sector and to explore funding opportunities.	It is not possible for water companies to fund water resource projects on behalf of other companies or organisations with no direct benefit to its customer base.	No Change Proposed.
OFWAT	Best Value Plan (BVP) and decision making	Addressing previous feedback – WCWR has not taken on board some important points raised through our previous consultation responses.	Thank you, your comment is noted.	No change proposed.
OFWAT	Best Value Plan (BVP) and decision making	Technical evidence – WCWR has provided limited written technical evidence to support its draft plan.	Technical appendices from the Water Resource Management Plan (WRMP) process will be adapted and pulled through to support West Country Water Resources (WCWR) bottom up approach to the Final Regional Plan.	Production of Technical appendices.



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OFWAT	Best Value Plan (BVP) and decision making	Best value – WCWR should provide more clarity on what its best value analysis means for the final plan, how sensitive decisions are to the assumptions made, and how cross-sector best value metrics are treated in associated WRMPs.	Best value planning in the West Country Water Resources (WCWR) is in its infancy and until the regional model / investment tool is compiled we are reliant on the individual water companies Water Resource Management Plans (WRMPs) / Best Value Plans (BVP) to inform our decision making and compilation of the regions BVP.	No change proposed.
OFWAT	Best Value Plan (BVP) and decision making	Adaptive planning – WCWR has not presented a single plan with one preferred adaptive solution and set of options with suggested branch point dates. This should be presented in the final plan.	Until the Regional System & Investment Model is built a true Best Value Plan will not be possible, but we will endeavour to use all three Water Resource Management Plans (WRMPs) to develop the best plan possible with the information we have.	No change proposed.
OFWAT	Best Value Plan (BVP) and decision making	Data tables – we are concerned about the level of detail and accuracy applied to the regional data tables and whether the options described in those tables have been considered in the plan. The tables had missing, incomplete, and resubmitted data. This led to some difficulties in our assessment. WCWR should provide robust and clear supporting evidence for its data tables.	West Country Water Resources (WCWR) has sought to improve its Data reporting approach between the constituent water companies and will ensure a more robust method of reporting is undertaken for the Final Regional Plan submission.	Improved reporting process for completion of the data sets.



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OFWAT	Best Value Plan (BVP) and decision making	Planning horizon: WCWR has met the requirement for a regional plan to forecast supply and demand over at least 25 years. The plan does cover a suitable planning period of 25 years to 2050 and WCWR states its intention to consider extending this to 2080. However, WCWR does not set out clear reasoning for the chosen time period with reference to the deficits it faces in the long term and should do so in the final plan.	Thank you, your comment has been noted. Extending the planning horizon over a longer period is something that remains a consideration for future publications.	No change proposed.
OFWAT	Best Value Plan (BVP) and decision making	Plans must compare options appropriately to arrive at the right outcomes. While we welcome some aspects of the approach taken by WCWR, we have some concerns in relation to its decision making and prioritisation that require further focus before the final plan is published.	West Country Water Resources (WCWR) has developed better working relationships with its partners (South West Water / Wessex Water / Bristol Water) with the intention to improve the groups decision making process across the South West region.	No change proposed.
OFWAT	Best Value Plan (BVP) and decision making	Addressing our feedback: WCWR has not responded to our feedback on the emerging plan decision making and prioritisation; we expect all our feedback to have been considered and responded to within the final plan.	West Country Water Resources (WCWR) has taken the opportunity to reponed to the consultation responses from the Emerging Plan within this Table of Responses document.	No change proposed.



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OFWAT	Best Value Plan (BVP) and decision making	Decision making approach: WCWR has provided no additional information on the outcome of its problem characterisation, justification for the planning period, and made no changes to its optimisation approach following our previous feedback. WCWR should present the outcome of its problem characterisation to justify its choice of decision-making approach. The best value decision-making approach remains basic since the emerging plan and falls short of what we would expect given the planning challenge faced. For the final plan, WCWR should revisit its decision-making approach and use an economics of balancing supply and demand (EBSD) model to complete cost benefit analysis of options as a minimum, including optimisation on best value metrics where possible.	West Country Water Resources (WCWR) will strive to develop a truly regional approach aligning Bristol Water, South West Water and Wessex Water to ensure a Best Value Plan (BVP) can be implemented. The start of this will be the development of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	No change proposed.
OFWAT	Best Value Plan (BVP) and decision making	The WCWR regional plan presents the metrics used for assessing best value. However, we would like to see carbon emissions in the final best value plan clearly presented alongside a clear discussion of the trade-offs made between whole life carbon emissions and other considerations to agree the final best value plan.	West Country Water Resources (WCWR) accepts that carbon emissions will need to be employed as a factor within the Best Value Plan (BVP) methodology. WCWR will strive to develop a truly regional approach aligning Bristol Water, South West Water and Wessex Water to ensure a BVP can be implemented for a range of factors. The start of this will be the development of the Regional System Model (Phase1) with Phase 2 - the Investment Model will follow.	No change proposed.



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OFWAT	Best Value Plan (BVP) and decision making	Decision making is likely to be influenced by artificial constraints. As well as the lack of sufficient options, as mentioned previously, the plan excludes desalination as an option type from the best value analysis.	Working with all partners the West Country Water Resources (WCWR) will be able to demonstrate as part of the Final Regional Plan a significant uplift to the numbers and variety of supply options.	No change proposed.
OFWAT	Best Value Plan (BVP) and decision making	While the high-level road map presented by WCWR for regional water resources modelling is a step towards informed decision-making, it is important that the evidence of investment is robust and reliable. WCWR should clarify how this will be improved for the final regional plan as well as the company WRMPs. Given the slow pace of progress since the emerging plan stage this is not currently clear.	West Country Water Resources (WCWR) will strive to develop a truly regional approach aligning Bristol Water, South West Water and Wessex Water to ensure a Best Value Plan can be implemented. The start of this will be the development of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	No change proposed.



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OFWAT	Best Value Plan (BVP) and decision making	There is qualitative discussion of the plan being adaptive referencing the uncertainties in climate, demand and environment, and that the plan can change as these become more certain with time. However, the plan does not set out which options are selected in the preferred and adaptive plans in detail and cannot be described as an adaptive plan at this stage.	The Final Regional Plan will set out the options selected via adaptive planning. West Country Water Resources (WCWR) aims to outline an adaptive plan within its submission.	Adaptive plan to be included in the Final Regional Plan.
OFWAT	Best Value Plan (BVP) and decision making	WCWR has not presented a single preferred best value adaptive plan with clear trigger / branch point dates. WCWR should work towards this as a priority. The choice of adaptive pathways and trigger points should be made based on the uncertainties and drivers of the uncertainties at that time. Headroom is expected to reduce in the longer term as uncertainty is absorbed into the adaptive planning approach. WCWR should ensure it is not double-counting uncertainty. We provided this feedback following the emerging plan and this point has not yet been addressed.	West Country Water Resources (WCWR) will strive to develop a truly regional approach aligning Bristol Water, South West Water and Wessex Water to ensure a Best Value Plan can be implemented. The start of this will be the development of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	No change proposed.



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OFWAT	Best Value Plan (BVP) and decision making	Solving the planning problem: WCWR has not provided sufficient and convincing evidence that its planning problem has been solved by the plan presented. The regional planning tables show there are two water resource zones that have a supply demand deficit. In the final plan, WCWR should include sufficient options to resolve the supply demand deficit across all water resource zones in the region for the whole planning period.	Further explanation on selected options will be included within the Final Regional Plan submission.	Further explanation on selected options will be included within the Final Regional Plan submission.
OFWAT	Best Value Plan (BVP) and decision making	Least cost and best value comparison: WCWR's plan should compare the cost of the best value plan to the least cost plan. The difference in expenditure should be clearly stated and cost drivers fully explained. The NPV costs of the plans in Table 4 of the regional planning tables should be checked for consistency between plans and with the Company plans.	Until the Regional System Model and Investment Model is built a true Best Value Plan will not be possible, but we will endeavour to use all three Water Resource Management Plans (WRMPs) from constituent water companies to develop the best plan possible with the information we have.	No change proposed
OFWAT	Best Value Plan (BVP) and decision making	Cost information: In terms of whole life unit costs, for both operational and capital expenditure, WCWR companies are selecting options that have higher unit costs than the average across the industry. There are a range of lower cost feasible options available and WCWR should explain in its final plan why high-cost options have been selected in their place. Market	West Country Water Resources (WCWR) have started engaging with the market to understand the appetite for Direct Procurement for Customers (DPC) and early consultation has proved positive, costings will only truly be understood once the Competitively Appointed Provider (CAP) agreement is tendered in Gate 3/4.	No change proposed.



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		engagement would help WCWR reduce the risk against costing and could support them to increase data quality for the final plan. We would encourage WCWR to engage with the market.		
OFWAT	Best Value Plan (BVP) and decision making	Low regrets investment: WCWR should provide sufficient and convincing evidence to demonstrate that the preferred programme represents low regrets best value investment over the long term.	The second round of regional planning will be informed by the new System and Investment Model being developed by West Country Water Resources (WCWR).	No change proposed.
OFWAT	Best Value Plan (BVP) and decision making	Bill impacts: WCWR should clarify how bill impacts have been considered as part of the final regional plan.	West Country Water Resources (WCWR) will outline the impacts on customers bill from the proposed plan within the Final Regional Plan report.	Inclusion of a customer impacts section within the Final Regional Plan to explain the effects that would be expected from the planning scenarios included.
OFWAT	Best Value Plan (BVP) and decision making	Leakage and water efficiency: WCWR is proposing to get to 110 litres per person per day by 2050. However, this does not appear to be calculated as dry year annual average (DYAA) based on the data tables which show per capita consumption (PCC) at 112.9 in 2050. We expect to see the regions planning to meet 110 at DYAA.	The regional planning tables in the Final Regional Plan will reflect the 110 litre per capita consumption for the dry year annual average.	Production of an appendix for the demand side and water efficiency options.
OFWAT	Best Value Plan (BVP) and decision making	Planning to meet water resources needs over the coming 25 years and beyond is of the utmost importance and these plans will have important implications for customers, society, and the environment. This is why we have pulled together this detailed feedback	Thank you, West Country Water Resources (WCWR) will set out its roadmap of future plans in the Final Regional Plan. We welcome the input from Ofwat from both written and in meeting format.	An updated roadmap of future plans will be included within the Final Regional Plan.



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		and why we expect to see the necessary improvements for the final plans. Once you have had a chance to consider these comments in detail, we would like to hear how you plan to address them and note that we have a session scheduled to do so later this month.		
OFWAT	Best Value Plan (BVP) and decision making	Regulators raised concerns in a letter to WCWR from RAPID in March 2022 about likely disruptions to the development of the regional plan given the departure of the group's lead. Ofwat also made representations on the emerging plan highlighting that significant work was needed to move from a high-level strategy to a best value single preferred adaptive regional plan that can inform individual WRMPs. Despite this, the draft plan shows only modest progress since the emerging plan. As a result, it is not clear how the regional plan has informed the WRMPs as required by the water resources national framework.	West Country Water Resources (WCWR) has taken an exciting step forward and gained approval to grow the group. We have taken on three extra people to date, with one more to follow. This growth will enable the team to work with a wider remit, targeting growing the footprint / influence of the WCWR. A critical area of focus is to ensure the messaging and campaigns on key areas such as water usage are led by this group.	No change proposed.
OFWAT	Best Value Plan (BVP) and decision making	While there has been some progress in areas such as customer and stakeholder engagement and work on pilot catchments, we have outstanding concerns relating to the draft plan which need to be addressed before the plan is finalised.	Thank you, your comment is noted.	No change proposed.



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South West Rivers Association	Best Value Plan (BVP) and decision making	It is essential that PR 24 is used to start the journey of delivery of the Plan including any investigations necessary to enable development of new sources and to reduce the adverse environmental impact of current schemes. In this context SWRA will separately comment on the SWW Water Resource Management Plan. The paucity of information in the SWW Environmental Destination paragraph (p105) compared with Bristol and Wessex suggests some way to go.	Thank you for your comment.	No change proposed.
South West Rivers Association	Best Value Plan (BVP) and decision making	Supports National Framework target to reduce water consumption. Having been involved in the development of all three strategic reservoirs and still involved in their operation I and the rest of SWRA Members probably have better understanding of the Supply and Demand side challenges than the vast majority of customers. Hence the reference above to the need for a strategic communications campaign to overcome the generally held view that water should be a freely available good.	Thank you for your comment.	No change proposed.



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Waterwise	Best Value Plan (BVP) and decision making	Partially understood plan . As an informed stakeholder we were able to navigate the plan but there were a number of areas within the plan which did not make sense the way laid out and have raised concerns for us (see also our response to question 4a) - and would make it more challenging for others to engage with the plan.	West Country Water Resources (WCWR) have committed to producing a more accessible document, which will highlight the key points from the regional planning process for a wider readership.	Re-working of the Final Regional Plan submission report to allow for easier access.
Waterwise	Best Value Plan (BVP) and decision making	We were pleased to see the Blueprint for Water Asks laid out in Appendix 1 and comments against these and that since the emerging plan you have completed this in full which will help the stakeholders analysis.	Thank you for your comment.	No change proposed.
Waterwise	Best Value Plan (BVP) and decision making	As you prepare your final plan a thorough proofreading process should be undertaken as there were several typos, links missing and low resolution graphics within the document that made it difficult to follow.	Thank you, West Country Water Resources (WCWR) is committed to producing a consistent and high quality final document.	Continued review of Final Regional Plan.
Waterwise	Best Value Plan (BVP) and decision making	It would also be welcome to have a section in the final plan outlining the challenges to your plan from the consultation and what changes you made as a result of these, or reasoning if no change was made. This helps stakeholders to see the contributions they and others are making and help understand the conflicting opinions you are having to navigate.	West Country Water Resources (WCWR) aims to respond to the consultation process by publishing its Statement of Response and accompanying Table of Responses.	No change proposed.



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Waterwise	Best Value Plan (BVP) and decision making	When assessing the potential savings from water labelling it is useful to highlight the difference that minimum standards can make effectively doubling the level of savings and this is something that WCWR should continue to advocate for.	West Country Water Resources (WCWR) will ensure it fully engages with the standards being set for water labelling regulations in the UK.	No change proposed.
WCRT (1)	Best Value Plan (BVP) and decision making	We understand the plan but the Westcountry Rivers Trust would like clearer summary expectations stated for each river on the likely volume of flow abstracted for both public and non-public supply both currently and predicted and how this varies over the year. This should be designed carefully with stakeholders to make the data more accessible using descriptive statistics (graphs, charts and maps) as well as infographics.	West Country Water Resources (WCWR) is in the process of obtaining this data for each of the focus catchments, while the public water supply data is well understood by the group third party abstractions have previously not been explored.	Continued development of the focus catchments.
WCRT (1)	Best Value Plan (BVP) and decision making	Finally, there needs to be the development of a suite of fisheries water banks to hold back water for key periods of drought to manage environmental pinch points and ensure sufficient flows for threatened, iconic or economically important species in collaboration with local groups and partnerships.	West Country Water Resources (WCWR) is committed to improving the environment by implementing its Environmental Destination programme.	No change proposed.



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WCRT (1)	Best Value Plan (BVP) and decision making	Improving the accessibility and clarity of what is known and what isn't known to improve individual river predictive consumptive use will make it easier for local groups to understand the impact on their river.	West Country Water Resources (WCWR) is in the process of obtaining detailed data for each of the focus catchments regarding non-public water supply abstractions. Public water supply data is well understood, and the combination of public and non-public water supply data is important on a catchment by catchment basis for all water users to understand pressures and impacts on the natural environment and were consumptive or non-consumptive uses need to be reviewed.	No change proposed.



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WCRT (2)	Best Value Plan (BVP) and decision making	Table 5 (pg 32) highlights that only one of the three outcomes of the Draft Regional Plan has secondary benefit (outcome: Deliver societal benefit) for the National Framework area of (i) long-term reductions in water use and direct benefit (outcome: Ensure water supply resilience) for the National Framework area of (ii) increase supplies. As these are core elements of the 25-year Environment Plan's 'clean and plentiful water' requirement (and now Defra's Plan for Water), do the links amongst these requirements, outcomes and proposed actions need to be strengthened to avoid risk? Most of the Draft Regional Plan document focuses on demand reduction and increasing supply, thus it is surprising to see them so weakly linked to benefits for the defined Plan Outcomes. Perhaps the metrics devised in Table 6 require revisit and review to better connect the Plan Outcomes with policy requirements? Can this really be described as a 'Best Value Framework' at present?	Until the Regional System & Investment Model is built a true Best Value Plan will not be possible, but we will endeavour to use all three Water Resource Management Plans (WRMPs) to develop the best plan possible with the information we have.	No change proposed.



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WCRT (2)	Best Value Plan (BVP) and decision making	It is excellent to see the following recognition of the need to integrate across the areas outlined on pgs 25-26: "For this initial plan we have focussed primarily on water resource needs. Moving forward we will look at the following key areas where there can be cross-sector benefit:" This needs to be ramped up ASAP especially in light of Defra's new Plan for Water.	Thank you for your comment.	No change proposed.
WCRT (2)	Best Value Plan (BVP) and decision making	There is a chance for WCWR Group to leap-frog and be ahead of the curve if it is brave enough to consider earlier than the other regional groups a range of approaches that are not currently mentioned e.g. considering GHGs more holistically (look beyond just carbon), circularity and regenerative practices – especially as these are now foregrounded in Defra's recent Plan for Water. zones and embrace what the future needs in the present.	Thank you, your comment is noted.	No change proposed.
WCRT (2)	Best Value Plan (BVP) and decision making	Additionally, the WCWR area water companies could catalyse and capitalise on significant shifts in innovation, technology, co-production with citizen-consumers and approaches to polycentric governance, if they step out of their comfort zones and embrace what the future needs in the present.	Thank you for your comment.	No change proposed.



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WCRT (2)	Best Value Plan (BVP) and decision making	The above point also applies to nature-based solutions (NBS) and natural flood management (NFM) and some types of sustainable drainage system (SuDS), which are not mentioned at all – connections should be sure to be made in line with the comment made in the draft Plan on pgs 25-26.	West Country Water Resources (WCWR) will include a section outlining the inclusion of nature based solutions and natural flood management which has been explored as part of the Focus Catchments work across the region. WCWR will also look to include details on sustainable drainage systems, and include references back to the recently published drainage and wastewater management plans by the water companies within the region.	Development of a response to the work conducted within the catchments on nature based solutions and future work that will drive these forward from the final plan position.
WCRT (2)	Best Value Plan (BVP) and decision making	No mention of required supply chain and workforce shifts required to deliver all that is/will be proposed - particularly acknowledging the coming 'silver tsunami'. This may be buried in the accompanying raft of annexes but is worthy of an explicit mention in the summaries.	West Country Water Resources (WCWR) welcome this comment and will aim to draw out potential supply chain issues for the development of the proposed options within the Final Regional Plan publication.	The Final Regional Plan will include a summary of supply chain preparedness for the development of future options and strategic resource options (SROs).
WCRT (2)	Best Value Plan (BVP) and decision making	No mention of the importance of providing fair and just water systems - although vulnerable customers are mentioned, there is not enough implicit let alone explicit mention of EDI in any shape or form - this is a vital cross-cutting theme that is always invisible. Waterwise's strategy goes some way in daylighting this but SWW/Pennon, WCWR Group and even Plan for Water haven't picked this up yet.	Thank you, your comment is noted.	No change proposed.



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WCRT (2)	Best Value Plan (BVP) and decision making	Whilst I support the target, clarity should be provided here that the National Framework target is to reduce average household POTABLE consumption to 110 l/p/d by 2050 – thus extending water reuse and rainwater harvesting for non-potable applications is crucial e.g. to social practices where highly treated potable water is not required, such as in toilet flushing and laundry, where feasible (especially in the tourism sector). The Westcountry Water Resources Group could lead the national shift in thinking and action on this vital area for our water future (which is already so common elsewhere across the globe).	Thank you, West Country Water Resources (WCWR) is committed to conducting further work on the reduction of demand across the region, and with its constituent water companies, aims to improve how water is used as a resource.	No change proposed.