



Appendix B

Draft Regional Plan - Table of feedback comments and our responses
Theme: Engagement and Collaboration



Engagement and Collaboration

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Blueprint for Water	Engagement and collaboration	It is positive that a range of stakeholder groups were consulted in the development of WCWR's draft plan, and we would welcome further detail about how this stakeholder engagement and multi-sector working will continue once the plan has been published. It is also welcome to see elements of equality, diversity and inclusion being considered in the draft plan; the inclusion of intergenerational equity as a best value metric is positive, and we would encourage wider social wellbeing and equity to also be considered.	Social value is considered as a component of the best value planning approach.	No change proposed.
Bristol Avon Catchment Partnership	Engagement and collaboration	Changing behaviour around water is potentially difficult to achieve for water companies working in isolation, but a coordinated approach to this through joint campaigns would greatly help in getting this message across. Changing behaviour around water use needs consistent and prominent messaging at a regional, and national scale and we wonder if the plan could help facilitate this by including mention of joint education and campaigns. This could potentially be in the short-term proposed regional plan.	West Country Water Resources (WCWR) have 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 and 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.



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Devon County Council	Engagement and collaboration	A partnership approach is critical to success here. It would be more impactful and efficient if the water companies co-ordinated their campaigns and measures – ideally this could tie into national branding and policy changes. In addition, there seems to be scope for companies to co-operate more and learn from each other.	West Country Water Resources (WCWR) would welcome the involvement of Devon County Council in the Regional Planning process.	No change proposed.



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Devon County Council	Engagement and collaboration	<p>Wider partnerships can also be effective - Devon County Council is very keen to build on the East Devon Catchment Focus pilot and other initiatives:</p> <ul style="list-style-type: none">• SWW is already a partner in the DRIP project, which is exploring a range of approaches, including nature-based upstream interventions, to address localised flooding.• The Devon Carbon Plan sets out clear priorities for de-carbonisation and we suggest it provides a useful framework of action, which this plan could allude to. In addition, the draft Adaptation Strategy is about to be published and again will be very useful for the chapter on adaptation.• Local Nature Recovery Strategy; DCC is the lead authority for this strategy and we are very pleased to have SWW on board.	West Country Water Resources (WCWR) aims to maintain and expand the Focus Catchment projects across the region and are pleased to see that Devon County Council are willing to engage sooner.	Further work on the Focus Catchment programme.
Devon Wildlife Trust	Engagement and collaboration	<p>We are very supportive of active engagement with local communities and with active drought management. We would urge environmental monitoring of pressurised water bodies and of active drought management measures to ensure minimum impact on biodiversity.</p>	West Country Water Resources (WCWR) in partnership with its stakeholders aims to improve its drought management approach by 2030 to meet a 1-500 year event resilience, as well as implementing its abstraction sustainability commitments.	No change proposed.



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Environment Agency	Engagement and collaboration	<p>We encourage WCWR to actively engage all relevant regional groups to ensure that all five regional plans form a coherent and consistent set of regional plans for England. You should use your regional plan consultation responses and the outcomes of the reconciliation process to update and finalise your regional plan. We expect final regional plans to be produced later this year after WRMP statements of response have been issued, but ahead of final WRMPs where possible.</p>	<p>West Country Water Resources (WCWR) will pursue engagement with all relevant regional groups during its preparations of the Final Regional Plan publication. Due to the "bottom up" approach, the water companies, Water Resource Management Plans (WRMPs) feed into the regional document, the publication of the Final Regional Plan will follow the publications of the WRMPs.</p>	<p>Changes to be implemented to ensure Final Regional Plan is aligned with all other regional groups before final submission.</p>
Environment Agency	Engagement and collaboration	<p>Consider how it will help its stakeholders understand the reasons and impact of the discrepancies in a revised draft regional plan and/or in a statement of response it may be producing for its regional plan.</p>	<p>West Country Water Resources (WCWR) have produced a Statement of Response report to its Draft Regional Plan consultation, this includes a Table of Responses in the appendices which addresses all comments.</p>	<p>Production of Statement of Response.</p>
Environment Agency	Engagement and collaboration	<p>We welcome the efforts of WCWR to engage with a range of stakeholders in developing its draft regional plan, especially the workshops it held for the pilot catchments, but consider that further engagement would have been beneficial, in particular better engagement with non-PWS abstractors.</p>	<p>Through the West Country Water Resources (WCWR) Focus Catchment schemes we are seeking to further engage with non-Public Water Supply (PWS) abstractors across the region in areas of key concern for abstractions pressures.</p>	<p>Further progress of the Focus Catchment work.</p>



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Environment Agency	Engagement and collaboration	<p>The final regional plan should set out how WCWR will work with other sectors to better understand these needs as a matter of urgency. The group should set out a detailed and ambitious engagement timeline to achieve this. It should also present a range of potential options, including third party and non-PWS options where deficits are likely in the future. If not required imminently, these options can be developed in time, but the final regional plan must provide further reassurance that these will be scoped within an appropriate timescale to reduce the risk of non-PWS supply shortfall whilst enabling economic growth.</p>	<p>West Country Water Resources (WCWR) has committed to further developments of the Focus Catchment program where non-Public Water Supply (PWS) needs and options will be further understood within the individual settings of the West Country Catchments. This work will continue to track national level developments that may be proposed across the region.</p>	<p>No change proposed. Except to report progress on Non-Public Water Supply abstractions in the Final Regional Plan.</p>
Environment Agency	Engagement and collaboration	<p>As WCWR develops its final regional plan it will need to take account of responses to its member water company WRMP consultations, feedback from regulators and stakeholders on its draft regional plan as well as wider changes affecting the water sector since the draft WCWR plan was produced. This should include:</p> <p>Learning from the 2022 dry weather event</p> <ul style="list-style-type: none"> • Water company proposals for accelerated schemes and any 	<p>West Country Water Resources (WCWR) welcome this guidance on content to include within the Final Regional Plan submission and will aim to cover these topics within the final submission.</p>	<p>Inclusion of:</p> <ul style="list-style-type: none"> • Accelerated schemes and regulator-agreed outcomes • Targets related to the Environment Act, the Department for Environment, Food and Rural Affairs (Defra) Environment Improvement Plan and Plan for Water • Changes to Government approach in relation to targets for housebuilding



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		<p>regulator-agreed outcomes on those proposals</p> <ul style="list-style-type: none"> • Targets related to the Environment Act, the Defra Environment Improvement Plan and Plan for Water • Changes to Government approach in relation to targets for housebuilding • Changes to our Water Resources Planning Guideline in spring 2023 		
Environment Agency	Engagement and collaboration	<p>We recommend that all regional groups prepare a biannual ‘checkpoint’ report to describe progress and are prepared to present this at the Strategic Steering group to demonstrate that timely progress is being made. This is especially important for WCWR given the short-term nature of the supply deficits outlined in its regional plan.</p>	<p>West Country Water Resources (WCWR) accept the recommendation that ongoing dialogue is required as move towards further developments of future Regional Plans.</p>	<p>No change proposed. Checkpoint report needs to be incorporated into West Country Water Resources (WCWR) programme plan.</p>
Environment Agency	Engagement and collaboration	<p>As indicated in our regional plan national summary issued in May 2022⁶ and recent letter from regulators to regional groups, effective integration of non-public water supply needs will be essential to the future success of regional planning. WCWR should continue engagement and work to gather appropriate data and information on other water users now, to enable robust forecasting to build upon our initial assessment of needs for the next round of regional plans.</p>	<p>West Country Water Resources (WCWR) are committed to engaging with non-Public Water Supply (PWS) users and abstractors and has sought to further this engagement within the Focus Catchment groups which have been set up around the region. These groups are to be expanded and working to continue seeking out higher levels of engagement from all water users and stakeholders.</p>	<p>Continued work on the Focus Catchments moving into the Final Regional Plan submission.</p>



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Environment Agency	Engagement and collaboration	<p>We have assessed the extent to which WCWR has taken a multi-sector approach and considered the needs of wider water users in its draft regional plan. We consider that WCWR has not adequately incorporated the needs of other sectors in its draft regional plan and shows limited evidence to justify its high-level assumptions.</p>	<p>West Country Water Resources (WCWR) aims to improve the diversity of organisations contributing to regional planning within the West Country and is exploring how to better integrate these into the outlooks of future planning.</p>	<p>No change proposed.</p>
Environment Agency	Engagement and collaboration	<p>As demonstrated across much of draft regional plan, we consider that the draft regional plan documentation that has been consulted upon does not well represent the work undertaken and the information the region has available. It is also unclear how or if non-PWS sector impacts or benefits have influenced the best value planning metrics or approach taken to derive a best value plan, and if or how the impacts of climate change and sustainability reductions on non-PWS have been considered and assessed.</p>	<p>West Country Water Resources (WCWR) has agreed at the recent Board meeting to expand the resources and team members within the WCWR to ensure better consultation throughout the region to ensure any impacts and/or benefits that could influence the Best Value Plan (BVP) are captured. It is unlikely that this approach will be able to influence this Final Regional Plan, but it will ensure the second round of planning will deliver a robust Regional Plan.</p>	<p>No change proposed.</p>
Historic England	Engagement and collaboration	<p>Finally, where there are potential impacts on assets that fall within the statutory remit of Historic England, we would welcome further engagement to ensure that harm to the historic environment is minimised or mitigated, and that where possible opportunities are taken to secure enhancements.</p>	<p>We acknowledge that the environmental assessments for gate two have identified potential impacts to heritage assets and the Bath World Heritage Site. It is proposed that more detailed assessments are carried out in the next phase, including consultation with Historic England, Bath & North</p>	<p>No change proposed.</p>



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			East Somerset council and other stakeholders.	
Historic England	Engagement and collaboration	Within the Regional Plan, section 9.1 sets out next steps and makes a commitment that the West Country Water Resources Group will (amongst other things) refine their best value plan assessments, and collaborate with stakeholders to get best value for customers and the environment. With this in mind, we urge the Regional group to give greater consideration to the historic environment. It is our view that the importance of the historic environment, and potential for plan proposals to impact on it, are not currently adequately reflected in the Regional Plan, dWRMPs and associated Strategic Environmental Assessments.	West Country Water Resources (WCWR) will develop a 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 (Phase 1) with Phase 2 - the Investment Model to follow.	No change proposed. Except to report on progress with regional modelling in the Final Regional Plan.



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Historic England	Engagement and collaboration	In addition, we advise that the local authority’s conservation and archaeology advisers are closely involved throughout the preparation of these plans and proposals. They are best placed to advise on: local historic environment issues and priorities (including access to data held in the Historic Environment Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.	West Country Water Resources (WCWR) will engage with these organisations when a Final Regional Plan has decided on a development pathway for future options.	No change proposed.
NFU	Engagement and collaboration	Collaboration and a multi sector approach is key in developing long term resilience. We must look at how we can collectively and collaboratively manage water better, in an integrated holistic manner. Where are the hot spot areas and how can we provide multi sector storage opportunities which tie into environmental opportunities and look to provide a water source? In working in this multi sector arena, what opportunities are there to collaborate and deliver through the PWS Water industry national environment programme (WINEP)	West Country Water Resources (WCWR) would welcome discussions with stakeholders around the development of multi-use assets across the region.	No change proposed.



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		programmes which provide benefits for all?		
NFU	Engagement and collaboration	<p>It is essential that mechanisms are developed that enable farmers to be integral and each stage of the process, consultation, design, and construction of any solution. This will ensure maximum opportunities are unlocked which will support resilient environmental outcomes and business sustainability. With the development of the new Environmental Land Management Schemes, there is still uncertainty for the farming industry and how they can be rightly incentivised for helping to improve the natural environment to help support an integrated water approach. This can be achieved by ensuring that the value of the price paid reflects a true profit foregone approach.</p>	<p>Thank you for your comment, it is noted and further engagement between West Country Water Resources (WCWR) and the National Farmers Union (NFU) is welcomed.</p>	<p>No change proposed.</p>



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NFU	Engagement and collaboration	<p>The Water Resource Management Plans for the WCWRG area (Bristol Water, South West Water, Wessex Water) all highlight the need to work in partnership with the water users, therefore WCWRG must work closely with landowners and agricultural stakeholders to ensure best outcomes for water quality and resilience. The Integrated Water Resources Management approach should be a key element of the Regional Plans, by promoting coordinated development and management of water, through stakeholders, the community and other water users, the WCWRG can help support both local and national water needs.</p>	<p>West Country Water Resources (WCWR) has committed to developing future catchment partnerships within its Focus Catchment work. Two pilot catchments are currently being undertaken across the region, with the aim of expanding this across the West Country into the next planning period.</p>	<p>No change proposed except to report on progress with the focus catchment under next steps section of the Final Regional Plan.</p>
NFU	Engagement and collaboration	<p>The agriculture sector needs assurance that water for food production is seen as an essential water user. The sector is not afforded the option to delay solutions as is provided to the PWS and yet the Government in the Food Strategy are asking for fresh fruit and veg to increase by 30% per capita. The sector needs assurance, certainty and confidence that access to water for food production is a priority and will be provided.</p>	<p>West Country Water Resources (WCWR) understands the concern that the agricultural sector holds with assurances to water access and will continue to engage with all stakeholders.</p>	<p>No change proposed.</p>



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NFU	Engagement and collaboration	To help implement the demand management and new resource options, a multi sector approach is required. The NFU strongly supports the continuation of work with other sectors. Collaboration is key and we support a multi sector approach. We acknowledge that a barrier to understanding agricultural and horticultural water needs is funding, so we welcome the opportunity to continue to work together to find solutions to this.	West Country Water Resources (WCWR) would also support further multi-sector working and is attempting to expand the scale of engagement across catchments.	No change proposed.
NFU	Engagement and collaboration	We would like to see WCWRG outline any steps that they are taking to work with farmers to identify opportunities for the construction of multi-use storage reservoirs or on rainwater harvesting projects. There may be opportunities to work together on these projects, particularly in locations where summer supplies and availability may be an issue.	The Focus Catchment schemes aim to work with farmers and other stakeholders to secure water resource needs across the region.	No change proposed.



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NFU	Engagement and collaboration	<p>The NFU and its members are always willing to work with WCWRG in order to develop catchment approaches and support farmers in their efforts to improve the water environment. However, these initiatives must be mindful that farmers run businesses and are under increasing pressures from a range of sources to deliver a variety of environmental objectives and this must be considered when planning catchment activities. We must also work together, and with other organisations engaged at the catchment scale, to reduce duplication of effort and improve the delivery on the ground.</p>	<p>West Country Water Resources (WCWR) welcomes further engagement and collaboration with the NFU and its members across the region.</p>	<p>No change proposed.</p>
OFWAT	Engagement and collaboration	<p>Stakeholder engagement must be meaningful and have sufficient reach. We are concerned by the delay in providing the WCWR data tables and that these have not been published. This has constrained our ability to engage with the plan and may have also presented an issue for others. WCWR should make this information widely available and make sure that it is provided alongside its final plan. Nevertheless, we are encouraged to see the wide engagement carried out by WCWR to seek views on the</p>	<p>West Country Water Resources (WCWR) will publish its finalised data tables along with the Final Regional Plan submission after the final Water Resource Management Plans (WRMPs) have been published.</p>	<p>Production of final set of data tables for the Final Regional Plan.</p>



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		approach taken and the proposed programme of solutions.		
OFWAT	Engagement and collaboration	WCWR has involved a large number of stakeholders across all 15 of its key segments, including customers and local government, and has engaged with them through numerous workshops, dissemination events and both formal and informal meetings. WCWR has pulled out several key themes and messages from its engagement programme and used these to inform and influence the selection and refinement of WCWR's approach to water resources management in the regional plan. However, the customer and stakeholder feedback summary remains quite broad in describing priorities such as investment in solutions (particularly new supply options), need for collaborative research, catchment and nature-based	West Country Water Resources (WCWR) welcomes your comment. The customer and stakeholder feedback summary is broad at this early stage as initial investigations and assessment for new supply options are undertaken. The business plans developed by the three constituent water companies include catchment and nature-based solutions, but these are not currently confirmed. WCWR will improve communication and engagement in these key areas as we have outputs from our regional investment model and confirmation of 2025-2030 business plan funding.	No change proposed.



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		solutions rather than the specifics in how to go about these and this should be developed for the final plan.		
OFWAT	Engagement and collaboration	WCWR should continue to liaise with stakeholders on how the consultation responses will affect the final plan. WCWR should now consider the responses to its draft regional plan consultation, and any additional stakeholder engagement carried out, and explain how these have influenced its final plan.	West Country Water Resources (WCWR) welcomes further engagement and collaboration with stakeholders across the region. WCWR have produced a Statement of Response to its Draft Regional Plan consultation, this includes a Table of Responses in the appendices.	No change proposed.



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South West Rivers Association	Engagement and collaboration	<p>Stakeholder Engagement: This has been patchy and not helped by changes in personnel. It is to be hoped that SWW's recruitment of fisheries technical specialists will promote discussion with like minds in the Fisheries and Riparian Interest Groups. Our statement of support for the establishment of a Fisheries and Riparian Interests Working Group now requires Terms of Reference to be drafted and agreed. In the SWW area this will complement the current Fowey Fisheries and Resources Group, Roadford Fisheries Liaison Committee and Exe Mitigation Group with all parties ensuring continuity of participation and transmission of thinking between the Regional Group and local Groups.</p>	<p>Thank you for your comments, we recognise the importance of engaging with all our stakeholders.</p>	<p>No change proposed.</p>
South West Rivers Association	Engagement and collaboration	<p>SWRA also supports the response from W RT which covers the importance of the Plan in relation to other environmental challenges.</p>	<p>Thank you for your comment.</p>	<p>No change proposed.</p>
South West Rivers Association	Engagement and collaboration	<p>Public and Media response to such bans in the light of the region's high rainfall tends to range from understanding to outrage and is likely to influence customer behaviour in a negative way. A more strategic long-term proactive public information campaign is needed. The companies do not need more public opprobrium</p>	<p>Thank you for your comment, it is noted and further engagement between West Country Water Resources (WCWR) and the South West River Association is welcomed.</p>	<p>No change proposed.</p>



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		on water supply added to that on sewage disposal.		
Waterwise	Engagement and collaboration	At Waterwise, we're committed to driving equity and preventing discrimination at work and in the work we do. A great deal of our impact is delivered through challenging others through consultations such as this to ensure equity, diversity and inclusion has been considered in all policy and planning decisions. We were pleased to see you including intergenerational equity as a best value metric. We encourage as you develop the final plan to consider the impacts on wider social wellbeing and how you will understand impacts of decisions, including in the long-term following trade-offs, on the diverse members of the WCWR community.	Thank you for your comment.	No change proposed.



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WCRT (1)	Engagement and collaboration	<p>Co-creation of water management plans. There needs to be greater and wider level of engagement in the development of water management plans. The region should be fully committed to taking a more holistic and integrated approach to water management and whilst this has been attempted significantly more collaboration is possible. This is especially important within Catchment Partnerships, which are referenced as a major vehicle to deliver whole water system management in the government's Plan for Water. The WCWRG needs articulate with the Catchment Partnerships as well as the wider public. There is a growing interest in our rivers, as shown by the increase in Citizen Scientists Investigations run by the Trust, and the increase in wild swimming and the more general public access of our rivers. Work is needed to build on this dynamic as these groups are significant advocates for the river and when trained can act as the eyes and ears of the river as well as push for funding to deliver change. They should be supported through an expansion of the water-saving community fund to instigate further monitoring and empower river action groups to apply for wider funding. The Trust already</p>	<p>West Country Water Resources (WCWR) recognise this need to develop better relationships with our local Catchment Partners and this has started with the formation of the new steering group within the WCWR "Environment Advisory Group" this group will be chaired by Lawrence Couldrick who has an excellent understanding of the needs of the local catchment partners. The group will reach out to expand its membership and present options to the WCWR Steering Group for inclusion in the Final Regional Plan.</p> <p>We welcome the involvement of the Trust as part of this group and will be in contact to invite the relevant members to the next meeting.</p>	No change proposed.
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helps groups become more consistent and robust in their approach to data collection, targeting of action and delivery of simple habitat works. These mini-river action groups could not only help provide opinion into water resource management but could also become a significant delivery force, especially if coordinated through the Trust as they can provide a level of locality and interest not easily replicated through paid staff within the county or regional eNGO network.



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WCRT (1)	Engagement and collaboration	Currently wider engagement on the board is limited and given the 2022 forecasts for the region to be in water deficit the Trusts feels there needs to be more inclusion of environmental NGO's and river interest groups, as these are likely to be impacted if supply demand targets are not met. This should include the feed in of data and activity from Catchment Partnerships at a regional level. The Trust is leading a Horizon project called Inn Water to increase engagement between Catchment Partnerships and feed Citizen Science water quality data into the WCWRG so it can be understood. As part of this the Trust CEO is willing to sit as a formal member on the WCWRG as our remit and area is broadly synergistic with the region and we work closely with other rivers trusts, NGO's and community river interest groups.	West Country Water Resources (WCWR) recognise this need to develop better relationships with our local Environmental Non-Governmental Organisations (NGOs) and this has started with the formation of the new steering group within the WCWR "Environment Advisory Group" this group will be chaired up by Lawrence Couldrick who has an excellent understanding of the needs of the South West. The group will reach out to expand its membership and present options to the WCWR Steering Group for inclusion in the Regional Plan. We welcome the involvement of the Trust as part of this group and will be in contact to invite the relevant members to the next meeting.	No change proposed.
Wiltshire County Council	Engagement and collaboration	To this end, we recognise the inclusion of the aim to achieve a household consumption reduction target of 110 litres per person per day across the West Country region. As you may know, for a large part of Wiltshire County, planning conditions on new residential development are already required to be built to specifications for water consumption of 110 litres per	West Country Water Resources (WCWR) would welcome further collaboration with Wiltshire County Council on its water efficiency programmes.	No change proposed.



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person per day. We are also in the process of reviewing the water efficiency standards (both for residential and non-household development) to be used within our emerging local plan policy and, to this end, we would be keen to be kept up-to-speed with your work in this area, including work you might be engaged in with other stakeholders and what mutual support may be available to us both.