



Appendix B

Draft Regional Plan - Table of feedback comments and our responses
Theme: Environmental Destination



Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Blueprint for Water	Environment	We want to see the regional plans prioritising the delivery and maintenance of a healthy water environment before making additional water available to abstraction for PWS, energy or other sectors. Where there is uncertainty we should adopt the government's precautionary principle, ensuring the needs of the environment are being met until the evidence shows that any additional abstraction does not result in unacceptable impacts on it.	Thank you for your comment.	No change proposed.
Blueprint for Water	Environment	The plan recognises that the consideration of [Nature Based Solutions] is required under the National Framework and states it will achieve this in part through work in 'focus catchments', particularly for natural flood management. It is welcome that the plan acknowledges customer and stakeholder support for NBS. That WCWR is actively working with partners, such as through Catchment Partnerships, to explore collaboration is welcome. However, some detail is still lacking, for example where the plan cites the WINEP as a route to NBS delivery. WCWR should aim to be as ambitious as possible, by preferentially choosing NBS options in future.	Thank you for your comment.	No change proposed.
Blueprint for Water	Environment	We cannot allow investigations into meeting future environmental needs to drag on beyond the next investment period (2025-30). We are therefore disappointed that the WCWR plan suggests very little action on	West Country Water Resources (WCWR) are liaising with the Environment Agency on its environmental commitments on the Environmental Destinations at a water	No change proposed.



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		the ground will occur prior to 2030, and will instead focus on understanding options based on BAU+. We want to see action on the ground before 2030 and decisions on further licence reductions to meet the needs of the environment need to be made by 2030.	company level and will follow the programme agreed with the regulators.	
Blueprint for Water	Environment	Whilst the plan legitimately notes that it is too early to assess what strategic Biodiversity Net Gain contributions could be made in relation to the Strategic Resource Options, we are concerned that draft best value metrics within the plan would score some schemes that deliver less than 10% and are therefore legally non-compliant. Delivery of biodiversity net gain should be critical to best value metrics; the current framing of this within the plan as 'one consideration of many' is therefore concerning. This cannot be acceptable if WCWR is to meet these legal requirements, and to make a contribution towards achieving the Environment Act to halt the decline of nature by 2030.	As part of the RAPID (Regulators' Alliance for Progressing Infrastructure Development) assessment scheme, Gate 3 development for the Strategic Resource Options the West Country Water Resources team will ensure that the metrics required to meet the Environment Act will be achieved and exceeded where possible.	No change proposed.
Blueprint for Water	Environment	We would hope that WCWR can show greater ambition in committing to deliver at least 20% BNG, and contributing to the recovery of nature wherever possible. For example, this could be achieved through supporting Local Nature Recovery	The West Country Water Resources (WCWR) team will ensure that stakeholder engagement is significantly expanded to capture more opportunities to support local nature recovery strategies, learning from other regional groups to deliver the best possible	No change proposed.



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		Strategies, as set out in Water Resources East's plan.	solutions for the environment and the customer.	
Blueprint for Water	Environment	We are disappointed that the plan does not describe how ambitions within the Water Industry Routemap 2030 will be met. The approach taken to scoring the carbon impacts of the options within the plan, and that these will be assessed further alongside company targets, the sector's 2030 ambition, and the Government 2050 net zero target is positive in principle. However, the plan gives no indication of how these bandings align with what is actually needed of the sector. It is welcome to see the plan acknowledging the importance of nature-based solutions for achieving net zero.	West Country Water Resources (WCWR) will include a section within the Final Regional Plan submission on the progress against the 2030 water industry route map.	Summary of the West Country Water Resources (WCWR) position on the 2030 water industry road map within the Final Regional Plan.



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Bristol Avon Catchment Partnership	Environment	Having a clear focus area within each catchment to start with will be a positive step that will allow for testing of the planned process and interventions. This will facilitate a process of learning before this is applied at a wider regional scale within the catchments. We are supportive of the proposal to work with partners to understand what work is already going on in the catchment, the current and future issues, working in partnership to develop a plan for environmental destinations that also improves water resources. Is there a possibility to see specific mention to catchment plans and partnerships, as an existing resource that could be drawn on e.g. the Bristol Avon Catchment Partnership Catchment Plan and all of the resources provided through the Bristol Avon Catchment Partnership?	West Country Water Resources (WCWR) is supportive of expanding the Focus Catchment approach across the region.	West Country Water Resources (WCWR) will work on continued development of the Focus Catchments.



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Bristol Avon Catchment Partnership	Environment	We do have some concerns around the wording and timeframe used around the environmental delivery phase of the plan at beyond 20 years (section 8.3.3). Whilst we can see there are environmental aspects within the plan at an earlier phase already, the phrasing of environmental delivery as the long-term phase may lead to the environment not being considered as a vital aspect of projects on the road to the point to beyond 20 years. Is there potential to reword this to ensure that it is more explicit that the environment should be at the heart of any decision that improves water resources in the region, particularly with the development of new resources such as the proposed Cheddar Two scheme. Under the detail of the proposed outcome “Improve the Environment”, is it possible to encourage ambitions which go beyond government targets?	When developing / delivering new supply solutions the environment will be at the heart of any decision, ensuring that any improvement in the water resources position for the west country will not be at the cost of a deteriorating environmental position. Our aspiration will be to go beyond the government targets where possible.	No change proposed except highlight where further information regarding the development of strategic resource options can be found as they progress through assessment phases.



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Bristol Avon Catchment Partnership	Environment	This was a concern we had with the WRMPs for Wessex Water and Bristol Water in the Bristol Avon area, and it is reassuring the regional plan is considering a scenario where 50% of the desired reductions are met given the targets are very ambitious. Could the plan more explicitly state how demand is reported and monitored at a regional scale, and at what frequency? This may help with the communication, understanding and support of existing partnerships. This is particularly relevant when changes to other options may be needed to protect water resources in the region	Demand is calculated using the data provided by South West Water, Bristol Water and Wessex Water. Future demand has been forecasted on an individual level and these forecasts are collated to provide a regional view of the changing water availability across the region.	No change proposed.



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CLA	Environment	<p>Farmland is also able to host numerous Nature-based Solutions to hold water on the land and encourage greater infiltration to groundwater. Nature-based solutions are crucial to CLA members, and WCWR's final plan should promote them; for example:</p> <ul style="list-style-type: none">• restoring meanders on straightened rivers, meaning they hold more water and flow more slowly; leaky dams, which store more water in rivers and discharge water more slowly;• regenerative agriculture techniques, such as cover cropping, no-plough agriculture and agroforestry, which improve soil health and allow a greater volume of water to infiltrate into soil and be stored in its structure;• well-managed swales and ditches, which can store large quantities of water;	<p>While West Country Water Resources (WCWR) welcomes the development of nature based solutions, the supply demand gap forecasted within the draft plan indicates a substantial deficit of water within the region by 2050. Therefore, new supply options are critical for development within the immediate future to ensure public water supply from sources of water which are readily available and resilient.</p>	No change proposed.



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CLA	Environment	<p>The draft plan does not join up flooding and drought effectively, although we are pleased to note that WCWR advocates separating sewage from surface runoff in the wastewater system. The CLA would like to see greater recognition of how Nature-based Solutions for drought also contribute to flood mitigation, by reducing the flashiness of catchments and slowing river flow, thereby retaining water in the landscape for longer and aiding infiltration to groundwater. WCWR's final plan should consider how to invest in NFMs. Options include regenerative agriculture, meander restoration, cover-cropping, woodland regeneration, and leaky dams, amongst others. NFM would create a healthier water environment and reduce the need to curtail current abstraction licences when employed alongside other interventions.</p>	<p>We welcome the comment, and the three constituent companies are aiming to include further work on nature based solutions within their AMP8 proposals (AMP - Asset Management Plan, the water companies business plan prepared on a five-year cycle). South West Water work on stemming the flow is being shared across the other companies.</p>	<p>No change proposed.</p>
Devon Wildlife Trust	Environment	<p>Other plans to improve the environment are welcomed and we would like to see SWW showing leadership and securing better outcomes by ensuring that biodiversity delivery aligns with priorities being set out in Local Nature Recovery Strategies and going well beyond the 10% minimum requirement to at least 20% gain.</p>	<p>Thank you for your comment.</p>	<p>No change proposed.</p>



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Devon Wildlife Trust	Environment	We are pleased to see recovering, recycling water and diversifying water supply within the plans. All should be subject to appropriate environmental and biodiversity assessments before plans are finalised. Suitable environmental monitoring programmes should be put in place.	Thank you, the Poole effluent re-use scheme is undergoing a robust application and scoping investigation through the RAPID (Regulators' Alliance for Progressing Infrastructure Development) assessment scheme.	No change proposed.
Devon Wildlife Trust	Environment	Where there is uncertainty, we should adopt the precautionary principle ensuring the needs of the environment are definitely being met until the evidence shows that any additional abstraction will not result in unacceptable impacts on it.	West Country Water Resources (WCWR) is committed to meeting its Environmental Destination objectives.	No change proposed
Devon Wildlife Trust	Environment	It is important to build the evidence base so that nature-based solutions can be more readily employed in future. We think the plans could do more to factor in that such schemes are important from a climate perspective too, being light on carbon and helping river systems (that we rely on for our water) to adapt to a changing climate.	West Country Water Resources (WCWR) welcomes the future development of nature-based solutions.	No change proposed.



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Devon Wildlife Trust	Environment	We are pleased to see certain water courses with reduced abstraction but it is critical to note that very few of our region's rivers have yet to meet WFD 'good' status. Water quantity in rivers affects concentrations of pollutants as well as abundance of wildlife. Whilst we note that minimum water levels use WFD as a 'hands off flow' guide, we suggest that a higher bar is set for abstraction levels to maintain healthy water bodies. Maintaining a good base flow is critical to aquatic life and healthy oxygen levels.	West Country Water Resources (WCWR) are committed to ensuring catchment improvements within the region through the Water Industry National Environment Programme and Environmental Destination programme.	No change proposed,
Devon Wildlife Trust	Environment	There can be multiple benefits of investing in whole catchment management, peatland restoration and natural water resource management (eg quarry restoration rather than building reservoirs) including biodiversity increase and carbon capture as well as improvements for leisure and recreation. These could be referenced in the plans.	Thank you for your comment.	No change proposed.



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Environment Agency	Environment	WCWR must work with the region’s water companies to ensure its regional plan reflects any changes required through the WRMP process to meet environmental obligations and incorporate any revised positions in its final regional plan. The regional plan must do more to reduce demand and promote more supply options, more quickly, so that current environmental obligations are met, and the risks of environmental deterioration are avoided or reduced, and any potential impacts mitigated.	West Country Water Resources (WCWR) will ensure that environmental obligations outlined within each of the Water Resources Management Plans are represented in full within the Final Regional Plan.	In our Final Regional Plan, West Country Water Resources (WCWR) will set out the actions we will take to deliver a step change for the next Regional Plan. This will include an integrated Regional Economics of Supply and Demand (EBS) model and water resource model.
Environment Agency	Environment	Secure and deliver environmental destination for the region as soon as possible and more fully demonstrate that the environment will be protected	West Country Water Resources (WCWR) is committed to implementing the Environmental Destination goals outlined within the Water Resources Management Plans and Regional Plan.	No change proposed.
Environment Agency	Environment	We acknowledge and welcome WCWR’s proposals to reduce abstraction pressure over time and the work that the region has undertaken to better understand this. The environmental destination for the region is focused on five catchments, with most catchments not considered in detail. Whilst we understand the reasoning for this approach, all catchments are required to be considered adequately.	West Country Water Resources (WCWR) accepts these comments and understands the ambition to apply this approach to all catchments.	In our Final Regional Plan West Country Water resources will consider this in the next steps section.



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Environment Agency	Environment	We strongly encourage WCWR to consider how it could better demonstrate that it will protect and meet environmental obligations across all catchments in the region for the final regional plan We would be pleased to advise WCWR how it could progress this for the final regional plan.	West Country Water Resources (WCWR) welcome the offer for advice regarding the environmental obligations within the regional plan.	Further enhancement of environmental obligation commitments within the Final Regional Plan.
Environment Agency	Environment	The proposed environmental destination is not regionally coherent, we consider that the environmental destination set out in the regional plan should deliver environmental benefits sooner, particularly for designated sites including the Hampshire Avon SAC that require abstraction reductions as soon as practicable.	The Environmental Destinations each of the constituent water companies have outlined within their Water Resource Management Plans will be fully represented in the Final Regional Plan.	The Final Regional Plan will include updates to the Environmental Destination elements in both the main report and technical appendix.
Environment Agency	Environment	The draft regional plan doesn't demonstrate delivery as quickly as is technically feasible as presented. WCWR should further consider and demonstrate how it could deliver abstraction reduction at a greater pace to deliver environmental benefits as soon as practicable.	West Country Water Resources (WCWR) will set out the technically feasible position within the Final Regional Plan.	A response to the West Country Water Resources position on the current abstraction reduction targets and timeline will be included within the Final Regional Plan.



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Environment Agency	Environment	No information has been provided on the environmental effects of the plan, the alternatives considered, how environmental considerations have been taken into account in the development of the plan, the inter- and intra-cumulative effects of the plan, and how any significant adverse effects of the plan will be mitigated and monitored. As such it is not possible to determine the environmental effects of the plan, and indeed whether the overall plan is deliverable. WCWR must clarify its approach to SEA and HRA and produce these documents if required for the final regional plan.	West Country Water Resources (WCWR) will draw through the Strategic Environmental Assessment and Habitat Regulations Assessment findings from the work conducted at the Water Resources Management Plan level for the Final Regional Plan.	West Country Water Resources (WCWR) will include Strategic Environmental Assessment and Habitat Regulations Assessment of options and Strategic Resource Options in the Final Regional Plan submission.
Environment Agency	Environment	Our review of the draft regional plan indicates that WCWR's approach to developing its environmental destination doesn't appear well coordinated, with water companies within the region appearing to follow different approaches and choosing environmental outcomes that are not regionally coherent. As a result, the overall approach appears aggregated from individual WRMPs and it is not clear if or how regional level decision making has derived the WCWR environmental destination. As presented, the draft regional plan appears less thoroughly considered when compared to other draft regional plans	The West Country Water Resources (WCWR) team recognised the need to better collaborate with all its partners and this started in February 2023 with fortnightly meetings to develop better relations with the water resources teams and to align our Water Resources Management Plans with the regional aspirations. The Final Regional Plan will be developed by aggregating all the Water Resources Management Plans within the region due to the lack of a regional Model/ investment tool. It is West Country Water Resources intention that the second round of planning will ensure the Regional Plan is sufficiently detailed to allow it to inform the Water Resources	No change proposed.



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			Management Plans for 2029 for the water companies in the region.	
Environment Agency	Environment	Pace of Delivery: WCWR's draft regional plan hasn't demonstrated that the pace of delivery of abstraction reductions is compliant with relevant environmental legislation, with the requirements for the Hampshire Avon SAC being of particular concern. The Conservation of Habitats and Species Regulations (2017) require targets to be met "as soon as practicable" and unlike other environmental legislation, this obligation has no associated requirement for measures to be cost beneficial.	There are many linked factors that determine the 'Pace of Delivery' which include the completion of investigations and the implementation timescales of solutions whilst ensuring continuity of water supplies and resilience. WCWR recognise the need to protect the Hampshire Avon Special Area of Conservation (SAC) and will be working with the water companies in the region to achieve this in a timely manner.	Ensure that a timeline of anticipated delivery of abstraction reductions is presented in the final plan.
Environment Agency	Environment	Scale of Reductions: WCWR should revise the building blocks of its environmental destination and then use the updated analysis to build a narrative around environmental destination which demonstrates that the regional plan meets the requirements of Environment Agency response to WCWR's draft regional plan consultation relevant environmental legislation and is developed to deliver best value for customers and the environment.	West Country Water Resources (WCWR) will formulate a position within its Final Regional Plan to build a combined analysis for the regional Environmental Destination.	An update of the West Country Water Resources position on Environmental Destination progress towards the Final Regional Plan.



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Environment Agency	Environment	The scale of likely water needs to meet the environmental destination, both in the low regrets and the long-term delivery phase, is significantly higher than the volume of replacement water provided by the options in the draft WCWR plan. We recommend that WCWR scope additional options as well as progress as many of the current options as possible on their fastest possible track, to ensure they can be implemented to meet the environmental need as early as possible.	West Country Water Resources (WCWR) will ensure that suitable options are outlined within the Final Regional Plan to ensure there is no shortfall in the water available under the scenarios outlined.	A review and update of the Final Regional Plan regarding the selected deployable options and Strategic Resource Options in the final Water Resources Management Plan submissions for 2024 from the constituent water companies.
Environment Agency	Environment	WCWR should also develop additional options, including more options specifically designed to resolve environmental issues, to meet likely needs that won't be met by the existing set of options. We expect that a future best value package of options would include nature-based solutions.	West Country Water Resources (WCWR) will be further assessing the list of available options to be included within the Final Regional Plan and will highlight the range of solutions considered.	West Country Water Resources will include presentation of additional options in the Final Regional Plan.
Environment Agency	Environment	The likely impacts for non-PWS abstractors of achieving the environmental destination has not been considered in the draft regional plan. This means that the potential strategic water needs of the region may be underestimated. WCWR should identify where the regional plan could play a part in supporting other sectors' resilience and improve how other sectors are included in plan development.	The West Country Water Resources (WCWR) intends to expand its understanding of Non-PWS abstractors throughout the South West over the coming years to ensure the second round of regional planning reflects true picture of the Supply Demand Balance (SBD) within the South West Region.	No change proposed



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Environment Agency	Environment	We are disappointed not to see more information in the draft regional plan to demonstrate that the region will prevent environmental deterioration from occurring. WCWR must continue to build the approach to preventing deterioration into their environmental destination scenarios and to ensure that preventing deterioration is fully integrated into the final regional plan. The final plan must provide assurance that a good quality, evidence-based estimate the impact on deployable output from preventing deterioration has been undertaken.	West Country Water Resources (WCWR) accept the comment and will include these changes within the Final Regional Plan.	An update of the West Country Water Resources position on Environmental Destination progress towards the Final Regional Plan.
Environment Agency	Environment	We expect WCWRs final plan to meet the requirements of: The Water Environment Regulations 2017 (WFD Regulations) require all water bodies to aim to achieve good ecological status or potential. The deadline is to achieve this by 2027 at the latest, with very limited exemptions allowing the date to be extended beyond 2027. If the statutory environmental objectives in the RBMPs cannot be met, we expect regional plans and WRMPs to justify why the solution cannot be delivered by the required deadline. Given these pressing statutory timescales we expect delivery of the solution to be planned for the earliest feasible and affordable delivery date (for example the earliest delivery date for a scheme to provide	West Country Water Resources (WCWR) notes your comment the Water Resources Management Plans will be used to address these points.	The Regional Plan will be updated to cover the aspects raised where possible and appropriate.



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		replacement water and thereby enable an abstraction reduction to go ahead).		
Environment Agency	Environment	We expect WCWRs final plan to meet the requirements of: Conservation of Habitats and Species Regulations 2017 (Habitats Regulations): Wherever abstraction reductions are planned to meet the requirements of failing sites under the Habitats Directive these changes must be made as soon as practicable. We interpret this to mean that WRMP options to provide replacement water should be progressed for the earliest feasible delivery date. This requirement is not subject assessment of cost-benefit or affordability.	This information will be drawn from the individual company Water Resources Management Plans and included within the Final Regional Plan submission.	The Regional Plan will be updated to cover the aspects raised where possible and appropriate.
Environment Agency	Environment	WCWR should review the timings of their options to ensure that environmental improvements are being delivered at sufficient pace to meet the legislation listed above. The logic behind the chosen option timings should be clearly described to justify how the plan meets statutory regulations and delivers best value outcomes for customers and the environment.	West Country Water Resources (WCWR) will draw this information through from the Water Resources Management Plan process and ensure the chose options are implemented on a timescale to deliver their intended benefit.	A forward view of delivery of schemes will be presented within the Final Regional Plan.



Environment

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Historic England	Environment	It will be important for the Regional Plan to reference the historic environment. While we acknowledge the importance of the natural environment in relation to the plan's content, there is nevertheless a risk that the historic environment has not been adequately considered.	West Country Water Resources (WCWR) will include references to how the plan will effect the historic environment within the Final Regional Plan submission and set out how this will be further assessed within the options development stage on a strategic resource level and a water company level.	Summary of historic environments and impacts to be added into the Final Regional Plan submission.
Historic England	Environment	There is much to be commended in the commitment to secure environmental improvements within the Regional Plan and dWRMPs, but this again lacks recognition of the historic environment. For example, we support a commitment to reconsider abstraction, which the NPS (paragraph 2.2.15) states in some cases will need to be reduced to protect the environment and help sustain important heritage assets...'. Within the Regional Plan, the environmental improvements referred to primarily relate to the natural environment (with a particular focus on certain environmentally sensitive ecosystems such as chalk streams) and could beneficially be broadened to consider the historic environment, recognising the potential impacts of abstraction on archaeology, palaeo environmental remains, or water dependent heritage assets.	Thank you for your comment.	No change proposed.



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Historic England	Environment	<p>In particular, as the plan area includes Bath, it will be important to consider the potential impact of proposals on the spring catchments of the City of Bath World Heritage Site and the Great Spa Towns of Europe World Heritage Site, mindful of The County of Avon Act (1982). In addition, areas of wetland, including the Somerset Levels and Moors, and peatlands including those within the Region's National Parks, are potentially sensitive to changes to the water environment and climate change. Conversely, these areas may offer opportunities to restore hydrological function of the peatlands, increase carbon storage and manage the water environment, whilst protecting and enhancing the natural and historic environments. We note, for example, South West Water's ongoing 'Upstream Thinking' project.</p>	<p>West Country Water Resources thanks Historic England for these comments and is committed to reaching net zero by 2040 across the three constituent water companies. A programme of nature based solutions are scheduled for further work within AMP8 (AMP - Asset Management Plan, the water companies business plan prepared on a five-year cycle) where peat land and other aspects of the natural environment will be explored.</p>	<p>Summary of historic environments and impacts to be added into the Final Regional Plan submission.</p>



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Historic England	Environment	Section 6.1 of the Regional Plan identifies the ‘focus catchments’ that have been selected as priorities for catchment restoration. While it is understandable that focus areas should be selected within such a large region, this should not be at the expense of other sensitive environments or heritage. For example, while the South West Water dWRMP proposes increased abstraction at Hawk’s Tor Pit, further information is needed on any impact this may have on Hawkstor Pit SSSI, an important palynological site for interpreting Late Quaternary environmental history, or on the adjacent peatland of Bodmin Moor (also SSSI).	The revised Water Resources Management Plan for South West Water should provide an update on this point once published.	No change proposed.
Historic England	Environment	We recommend that the Regional Plan should include a few paragraphs summarising why the historic environment is important in the context of water resource planning and management, what steps have been taken so far to consider the historic environment and how proposals will need to take the historic environment into account going forward.	West Country Water Resources (WCWR) will include references to how the plan will affect the historic environment within the Final Regional Plan submission and set out how this will be further assessed within the options development stage on a strategic resource level and a water company level.	Summary of historic environments and impacts to be added into the Final Regional Plan submission.



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Historic England	Environment	<p>In relation to the mitigation proposals within Strategic Environmental Assessments, while generic or high-level proposals to minimise or mitigate harm to the historic environment</p> <p>In relation to the mitigation proposals within Strategic Environmental Assessments, while generic or high-level proposals to minimise or mitigate harm to the historic environment may be included, we consider that more work is required to identify project specific mitigation with a greater level of confidence. We wish to draw the attention of the Regional group to Schedule 2 be included, we consider that more work is required to identify project specific mitigation with a greater level of confidence. We wish to draw the attention of the Regional group to Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004, which indicates that Environmental Reports should include: ‘7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme’.</p>	<p>Thank you, West Country Water Resources (WCWR) will ensure that the regulation surrounding the mitigation of significant adverse effects on the historic environment are followed.</p>	No change proposed.
Historic England	Environment	<p>For example, section 4.1 of the Regional Plan paints a picture of ‘the region at a glance’. We believe that this section would benefit from a description of the heritage resource of the area, including archaeology, coastal heritage, four World Heritage Sites</p>	<p>West Country Water Resources (WCWR) will include references to how the plan will effect the historic environment within the Final Regional Plan submission and set out how this will be further assessed within the options development stage on a</p>	<p>Summary of historic environments and impacts to be added into the Final Regional Plan submission.</p>



Environment

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		and a range of geologies and landscape character areas.	strategic resource level and a water company level.	
Inland Waterways	Environment	Protecting and improving the natural environment. They are blue-green corridors that allow opportunities for reconnecting disparate habitats, biodiversity net gain and improvements for wildlife. - Connecting communities. Access to the paths that run alongside our waterways is free. These inclusive, flat, linear routes can be used as active travel corridors to connect communities and provide passage between urban and rural areas.	Thank you for your comment.	No change proposed.
MoP 1	Environment	Deterioration in the classification status of aquatic ecosystems, protect them and improve the ecological condition of waters". My research into the changing ecology of Clatworthy Reservoir in Somerset (soon to be published in the Field Studies Journal) indicates an ecosystem in a state of near-collapse. I suspect that similar situations exist in other artificial lakes used to supply water in the UK.	West Country Water Resources requests a copy of the publication.	No change proposed.



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MoP 1	Environment	Climate change is occurring more rapidly than scientists had anticipated not that long ago. New records are being set at progressively shorter intervals. The time-scale outlined in the Draft Plan may be too generous –there should be a “sooner rather than later” principle as an integral part of the decision-making process.	Thank you for your comment.	No change proposed.
MoP 1	Environment	As mentioned above, I feel that reservoirs themselves should be recognised as important aquatic habitats. They require sensitive management to enhance local biodiversity, in the water as well as on the surrounding land. I recognise that this aspiration may be in direct conflict with the primary function as a public water supply. However, is there not an ethical question regarding the creation of a wildlife habitat by human activity, only for it to be knowingly damaged or destroyed by subsequent human action?	West Country Water Resources (WCWR) understands the issue and works with all stakeholders to balance the needs of society and the environment when managing operational water assets.	No change proposed.



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Natural England	Environment	We believe that the process undertaken to estimate the water needed to meet Environmental Destination objectives as part of the this draft Regional Plan has been inadequate.	<p>The Environmental Destination scenarios selected for the Emerging Regional Plan were the Business As Usual (BAU) and enhanced Environment Destination outcomes. The Emerging Plan presented fiive future water resource scenarios. Three of these scenarios used the BAU outcome and two used the enhanced Environmental Destination outcome. The draft plan developed these scenarios further replacing the BAU scenario with an improved Business As Usual Plus (BAU+) scenario.</p> <p>As a minimum, all regional plans are now using the latest best estimate of BAU+ (developed with local regulatory engagement applied), with the latest position on licence capping included. This represents a minimum but stretching level of environmental protection advocated in the guidance.</p>	No change proposed.



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Natural England	Environment	<p>The modelling scenarios applied do not take account of the needs of European water-dependent sites which are not rivers, wetland SSSIs, priority habitats and protected species. Further information on the legislative and policy requirements relating to these sites and features is provided in our dWRMP responses. In short, we remain concerned that the current estimates of the water resource required to meet Environmental Destination are too low and cannot be relied upon for supply-demand balance assessment, and we request that this uncertainty needs to be made clear.</p>	<p>WCWR is committed to fulfilling the Environmental Destination and sustainability reductions agreed with the Environment Agency. Investigations will be undertaken to confirm the reductions in abstraction agreed as part of the Environmental Destinations initiative. Those investigations will determine whether the values proposed are too high or not sufficient to meet the desired outcome.</p>	<p>The Final Regional Plan will explain the Environmental Destination programme and plan for future investigative work.</p>
Natural England	Environment	<p>We note the use of terminology in the draft plan, such as ‘the preservation of the local environment and habitats’ which suggests a lack of understanding of Environmental Destination requirements and government’s Nature Recovery agenda. More positively, we do recognise that projects are proposed within the WINEP to help address these shortcomings. These are crucial to ensure that environmental needs are adequately assessed and we look forward to working with the West Country companies as these work streams progress.</p>	<p>Thank you for your comment.</p>	<p>No change proposed.</p>



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Natural England	Environment	Whilst we recognise the value of the Focus Catchments described and analysed within the draft Regional plan, we have consistently advised that using this approach as the mainstay of Environmental Destination within the plan neglects key responsibilities on the companies, for example HRA needs. This point is particularly relevant to the River Avon SAC, River Camel SAC and the Somerset Levels and Moors Ramsar where water availability is already known to be threatening site integrity.	West County Water Resources (WCWR) recognises the work needed to complete its Habitat Regulations Assessment and Strategic Environmental Assessment obligations and these have been included within the constituent companies draft Water Resources Management Plans. A summary of these will be provided within the Final Regional Plan.	Appendix to be produced for the final regional plan for the Habitat Regulations Assessments and Strategic Environmental Assessments.
Natural England	Environment	Considering nature recovery obligations, and in these instances particularly, we are of the opinion that proposed actions do not go far enough, are too slow in implementation, and are not appropriately prioritised. In some cases we believe that proposed actions to address flow problems are simply not appropriate or in line with government guidance, such as ‘upstream support of the river’ on pg 37. It is not entirely clear what this action refers to, but it is worth noting that the approach often referred to as ‘stream support’ will not be appropriate in many locations.	A delivery programme of further investigations will be provided within the Final Regional Plan.	A delivery programme of further investigations will be provided within the Final Regional Plan.



Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Natural England	Environment	We welcome the references to the potential value of nature-based solutions within the draft plan but we feel that there is far more scope for considering such options in the overall strategy for balancing the water needs of people and the environment in the future. Linked to this, establishing more natural hydrological functioning of catchments, with the multiple benefits that this brings, also warrants far more consideration.	Thank you for your comment.	No change proposed.
NFU	Environment	The NFU supports the Strategic Themes highlighted in the WCWRG Draft Regional Plan.	Thank you for your comment.	No change proposed.
NFU	Environment	The WCWRG Draft Regional Plan is clear in its strategic outcomes and the future of water resources in the region and what opportunities are available. The NFU supports and understands the 3 outcomes on page 30, however The NFU asks that the regional plan continues working closely with farmers and land managers in the region to help achieve these. This is important for the regional plan to continue to be flexible and adaptive as new challenges arise.	West Country Water Resources (WCWR) will ensure that further engagement is undertaken with farmers.	No change proposed.



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NFU	Environment	<p>Within water resources we focus on water scarcity and drought, however, flooding occurs across the region and impacts on water resources as well as impacting on farm businesses and the agriculture sector. WCWRG could look to help drive technological innovation to improve flood management and water use, and support knowledge transfer to increase resilience to climate and water risks, as referred to in the NFU Integrated Water Management Strategy.</p>	<p>Each of the water companies within the West Country Water Resources (WCWR) region have produced a Drainage and Wastewater Management Plan (DWMP), the Final Regional Plan submission will aim to give some highlights of areas where there is cross over in the works being undertaken.</p>	<p>Link draft Water Resources Management Plans into holistic water management.</p>
NFU	Environment	<p>There are also great opportunities to further work with other water users such as farmers, to share resources and plan together. This can be achieved through incentivising and supporting farmers in using nature based solutions. Nature based solutions can help to restore, manage and protect our water resources while also increasing additional social and economic benefits to our rural communities. The agricultural industry can help support nature-based solutions for water security, by improving our soil health and resilience, as well as wetland construction, restoration, management and protection. Therefore, it is important that the WCWRG continues to engage with the land owners to support nature based solutions and build water resource resilience.</p>	<p>West Country Water Resources (WCWR) welcomes the continued engagement with the National Farmers Union, its members and local farmers across the region.</p>	<p>No change proposed.</p>



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NFU	Environment	The NFU continues to ask for significant investment in water infrastructure to protect existing farmland and food production during extreme weather events, increase our food security, and help deliver the NFU's ambition for farming to be net zero by 2040. The creation of a multi-sector integrated water management strategy would help secure a fair share of water for agriculture and establish the agri-food sector as an essential user of water.	West Country Water Resources (WCWR) would be supportive of developing a multi-sector strategy to ensure water needs were fully realised and understood for long term planning.	No change proposed.
NFU	Environment	The NFU understands the benefits of selecting 'focus catchments' to environmental restoration works. We further stress the need for multi sector working, to ensure that any approaches and findings carried out within the focus catchments are shared across sectors within the region.	West Country Water Resources (WCWR) will complete further work on the Focus Catchments, drawing in more sectors to this work is ongoing.	Outline next steps on the Focus Catchments.
NFU	Environment	On page 60, the Draft Regional Plan states that 'work on the focus catchments should be progressed where there is sufficient scientific evidence to support reductions in the water abstracted.' We ask that when considering reductions in abstraction, that the impact reduced water has on food production is also considered in the evidence gathering. It is important that when discussing the impact of reduced water availability on the agriculture sector that the wider food picture is taken into account.	Thank you for your comment.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
NFU	Environment	The WCWRG need to work in partnership with other water users such as farmers, to share resources and plan together. This can be achieved through incentivising and supporting farmers in using nature based solutions. As mentioned under opportunities, nature based solutions can help to restore, manage and protect our water resources while also increasing additional social and economic benefits to our rural communities. Therefore, it is important that WCWRG continues to engage with the land owners on a catchment scale to support nature based solutions and potentially reduce further demand on water supplies.	West Country Water Resources seeks to expand its current methods of collaboration and engagement with other water users.	No change proposed.
NFU	Environment	Overall, it is encouraging to see that the challenges facing agriculture are being highlighted in the Draft Regional Plan and that it is acknowledged and recognised there is more which needs to be done. We continue to believe that there could be significant opportunities to develop water storage features by working with farmers.	Thank you for your comment.	No change proposed.
NFU	Environment	The NFU asks that the WCWR Regional Plan looks to work at a sub regional / catchment level to fully understand the implications of water resources within those catchments and ensure solutions are focused and specific.	West Country Water Resources (WCWR) aims to work fully with local stakeholders by expanding the Focus Catchment programme further across the region.	West Country Water Resources (WCWR) will complete further work on the Focus Catchments, drawing in more sectors to this work is ongoing.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
NFU	Environment	The NFU asks that the WCWR Regional Plan looks to provide a timeline for working with the agricultural sector to understand the options and how they support the short, medium and long term risks of water shortages. Once the deficits are understood, the sector can look at the possible range of solutions that could be available and, can understand their fit in a multi sector plan.	West Country Water Resources (WCWR) will work to engage more closely with the agricultural sector and outline the risk to water access for the farming industry.	Inclusion of timeline for agricultural engagement within the Final Regional Plan.
NFU	Environment	The NFU asks that the WCWR Regional Plan looks to provide assurance that regulation will work alongside the proposed options to secure water resources for a sustainable future for agriculture.	West Country Water Resources (WCWR) will provide these assurances within the Final Regional Plan.	Statement of assurance to be included within the Final Regional Plan.
NFU	Environment	The NFU asks that the WCWR Regional Plan looks to ensure fair access, for agri-food abstractors, to the available water resources. • ensure a food risk assessment is undertaken, reviewing the impact and implications of reduced water available to the agriculture sector.	West Country Water Resources (WCWR) would encourage the NFU to assist its members with obtaining and increasing water resilience within the agricultural industry. Signposting and assisting members with applications to develop water storage within the farming industry	No change proposed.
OFWAT	Environment	Despite our previous feedback, and the predicted increased water needs, most regional groups have chosen 2039-40 as the regulatory target for achieving 1 in 500 year level of drought resilience without sufficient testing or explanation. We expect regional groups to explore fully the trade-offs around	The Final Regional Plan will present a clearer picture, detailing multiple trigger points throughout the adaptive planning process to ensure decisions are made that reflect the positions of the constituent water companies at the time of asking.	From the company WRMPs develop informative adaptive plan infographics, and the route to achieve 1 in 500 drought resilience will be explained in the final plan.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		different pathways to 1 in 500 year drought resilience at a regional scale and to identify and present the costs and benefits of varying the timing of this in the final plans.		
OFWAT	Environment	WCWR has provided some evidence around how it has explored the tradeoffs it faces through customer and stakeholder feedback. However, no evidence of sensitivity testing around the year in which the plan aims to meet the 1 in 500 year drought resilience has been presented and there is no commentary on levels of service.	The Final Regional Plan will see the inclusion of each of the constituent water company Water Resources Management Plans strategy for meeting the 1 in 500 year drought resilience.	The Final Regional Plan will include updates to the drought resilience to 1 in 500.
OFWAT	Environment	Abstraction – given the scale of potential changes, WCWR needs to demonstrate that its final plan can manage this uncertainty without abortive investment and should plan investigations to find the best value options to adapt to future uncertainty selection of large infrastructure projects. WCWR should make sure the final plan is consistent with any supporting data.	West Country Water Resources (WCWR) understands the level of potential change across the region in terms of abstraction volume losses (driven primarily by climate change and environmental destination abstraction reductions), the Best Value Planning will be outlined in the individual Water Resources Management Plans and translated through into the Regional Plan. Until the Regional model & Investment tools are developed 2026/7 the Regional Plan will need to reflect a combination of Best Value Plans from all three of the Water Resources Management Plans produced by the constituent water companies.	Ensure Best Value Planning in Water Resources Management Plans translates into Final Regional Plan.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT	Environment	<p>Drought resilience: WCWR has provided some evidence of exploring the various tradeoffs it faces through customer and stakeholder feedback. However, WCWR is yet to fully explore tradeoffs around different pathways to 1 in 500 year drought resilience at a regional scale. Despite our feedback on the emerging plan, WCWR has not provided evidence of sensitivity testing around the year in which the plan aims to meet the 1 in 500 drought resilience and there is no commentary on levels of service. Sensitivity testing should be undertaken around the year in which the plan aims to meet 1 in 500 year drought resilience. WCWR should explore the costs and benefits of flexing the 1 in 500 year drought resilience target year further using sensitivity testing.</p>	<p>The Final Regional Plan will see the inclusion of each of the constituent water company Water Resources Management Plans strategy for meeting the 1 in 500 year drought resilience.</p>	<p>The Final Regional Plan will include updates to the drought resilience to 1 in 500.</p>



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT	Environment	<p>Abstraction: WCWR has progressed its work on the required changes to abstraction since its emerging plan. However, the resulting water need is large and has increased markedly since the emerging plan. Estimated changes have increased from 144 megalitres per day (Ml/d) in the emerging plan to 180 Ml/d in the draft plan. WCWR should focus on how that uncertainty will be managed in its final plan. To support this WCWR should:</p> <ul style="list-style-type: none">• Explain how its final plan considers the full range of potential abstraction changes without unnecessarily bringing forward investment that may not be needed.• Carefully scope its planned investigations to better understand the links between abstraction and the environment locally (for example, surface water and ground water interactions) and the type of option that may be most beneficial in that context.	<p>West Country Water Resources will draw the final set of options from the three Wwater Resources Management Plan programmes to cover the increase in water needed within the region. All options have been subject to Strategic Environmental Assessment (SEA) and further detailed investigations will be required to assess the potential for local environmental effects and if required any mitigation options.</p>	<p>Collation of the investigations conducted for the three Water Resources Management Plans to produce Strategic Environmental Assessment summary for the Final Regional Plan.</p>



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT	Environment	The proposed investigations are important because solutions could include reductions in overall abstraction, changes in how abstractions operate (such as changing river flow related conditions, compensation flow arrangements from reservoirs or seasonal variations) or moving where abstractions or discharges are in the catchment / waterbody. We are keen that this sort of thinking informs regional and company plans as we want to see local water management solutions thoroughly considered before companies select replacement water from the list of feasible supply options. Local water management solutions have the potential to be lower cost and to bring greater benefits than simply replacing the water lost with another supply option that is likely to bring its own environmental impacts.	West Country Water Resources (WCWR) has produced a Draft Regional Plan based on the Water Resource Management Plans of the constituent water companies and agree that local water management solutions are important. Detailed site or supply zone specific information will become apparent following environmental investigations and water supply or engineering optioneering assessments.	No change proposed
South West Rivers Association	Environment	The proposed 1:500 resilience target is unrealistic given the uncertainties associated with climate change, population growth and demand forecasting. The use of statistical probabilities may be understood by the industry and regulators but the public and politicians will not accept more frequent failures.	West Country Water Resources is committed to achieving a 1 in 500 year drought resilience level through the development of both supply and demand options for the increase in water available, the reduction in network leakage and the reduction in overall water demand.	No change proposed.
South West Rivers Association	Environment	Both Natural England and SWRA supported the choice of focus catchments in view of their current strategic supply use and	Thank you for your comment.	No change proposed.



Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		<p>vulnerability to inadequate flow protection. Within the Plan there are references to the need for better understanding of the environmental needs of rivers to enable moving towards the environmental ambition. There is a substantial existing body of peer-reviewed research/literature and empirical experience of the needs of rivers which should reduce uncertainty on what the environment needs as mentioned in the Plan. This would enable both good resource planning/management and very focussed catchment level studies to ensure optimum Environmental Protection and Enhancement. An example is the Salmon Radio Tracking Study carried out by Dr David Solomon commissioned by SWW.</p>		
South West Rivers Association	Environment	<p>The Fowey and Tamar both have Index River Fish Counters that provide much data on the impact of regulated flows on those rivers. The same is needed on the Exe which is the third strategic supply river in SWW's area and one of the selected Focus Catchments.</p>	<p>Thank you for your comment.</p>	<p>No change proposed.</p>



Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
South West Rivers Association	Environment	This sustainability is already dependent on Drought Orders, Emergency Abstractions, and Customer Restrictions. The first two inevitably lead to environmental stress and reduce the probability of the Regional Plan meeting the stated Environmental Ambition. From SWRA's standpoint there has been insufficient attention to the environmental and fisheries impact of emergency measures compared to ensuring public water supplies – this may result from taking too much comfort from the so-called Sustainable Water Supply Position.	West Country Water Resources (WCWR) aims to move to a more environmentally positive position with regards to its abstraction regimes as we move through the planning horizon. WCWR is committed to meeting its environment ambitions through working with its regulators and stakeholders.	No change proposed.
South West Rivers Association	Environment	While the current parlous state of some chalkstreams caused by over-abstraction is recognised Regional Plan must not focus on that to the detriment of the rain-fed rivers further west.	Thank you for your comment.	No change proposed.
South West Rivers Association	Environment	The lack of certainty in the Plan is well recognised but should not cause delay in developing new sources which in turn can support environmental improvements.	West Country Water Resources (WCWR) is committed to developing new sources of water for supply through both the Water Resource Management Plans and Strategic Resource Options programmes.	No change proposed.



Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Waterwise	Environment	Whilst pleased to see the analysis of the carbon footprint of the draft plan we were disappointed that this seems to have focussed purely on supply side schemes. The potential carbon saving benefits from reducing water demand are possible alongside carbon costs for those demand management interventions.	Thank you for your comment.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (1)	Environment	Over the past 30 years the Trust has pushed for Integrated Catchment Management and as part of this has sat on catchment partnerships, local nature partnership and regional flood and coastal committees. This integrative approach delivers multiple funding streams but is limited due to the inherent uncertainty of Nature Based Solutions and the challenges with procuring groups that can maximise broad societal benefits for a specific cost, as opposed to contractors delivering single engineered items at the lowest value for money threshold. The role of Nature Based Solutions for water resource protection is further behind than flood risk management and a long way behind water quality benefits, however projects like PROWATER have demonstrated their value as well as how to target and deliver both rural and urban measures. The Trust and the wider Upstream Thinking partnership is incredibly well placed to develop, design and deliver and new Outcome Delivery Incentive for water resource protection and deliver this against the current water quality schemes.	Thank you for your comment.	No change proposed.



Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (1)	Environment	We suggest the group work with the Trust and other partners to communicate and integrate the various schemes and programmes, such as the Upstream Thinking partnership, deliver broad water resource protection measures, such as soil management, tree planting, wetland and pond creation across all drinking water abstraction points.	West Country Water Resources (WCWR) welcome further collaboration on improving water quality and catchment management.	No change proposed.
WCRT (1)	Environment	It is suggested that the WCWRG help facilitate discussions with the Environment Agency and Local Authorities on the creation of a collaborative Nature Based Solution Non-Governmental Organisation frameworks to pull together multiple funding routes to deliver flood, drought, water quality and biodiversity drivers against an Integrated Catchment Management approach using Nature Based Solutions.	Thank you for your comment.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (1)	Environment	WRT supported the choice of focus catchments in view of their current strategic supply use and vulnerability to inadequate flow protection although given the status of the Coliford Supply Zone this area should be of significant point of focus too. As stated above, managing future flows in an integrative and collaborative manner to ensure sufficient water for people and the river is vital but we remain deeply concerned the demand and supply plans will not be sufficient. The plan is dependent on increasing supply and reducing demand, but the water system is still siloed and the recent changes to future water resource scenarios for the West Country (from surplus to deficit) demonstrate the risks are very real and will significantly impact river health. Therefore, work is needed to build river resilience.	Thank you for your comment.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (1)	Environment	<p>River flow is as important to wildlife as water quality but is often overlooked. Many of our rivers fail water quality status due to pollution, which is exacerbated by the lack of dilution, and when coupled with high river temperatures leads to significant stress on river species.</p> <p>Each river reach is important and top level catchment assessments often fail to reflect local conditions, especially with issues such as migration barriers for fish, so detailed assessments are required as well as significant work to make our rivers as resilient as possible and ensure sufficient flows.</p>	Thank you for your comment.	No change proposed.
WCRT (1)	Environment	The deep dive pilot catchment reports within the WCWR portal are a good start but they are too complex for most, especially as the text and figures are split out.	A summary of the deep dive catchment schemes will be included within the Final Regional Plan publication.	Focus Catchment summary report to be included within the final submission.
WCRT (1)	Environment	There needs to be a region wide increase the level of river and fisheries monitoring and planning through Catchment Fisheries Plans to allow sufficient understanding of current aquatic species including fisheries assessments and actions that will increase habitats and species resilience. This needs to include a fish in distress monitoring scheme and fish rescue team that can work alongside the Environment Agency. It could	Thank you for your comment.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		also support low flow monitoring through the Citizen Science Investigation network.		
WCRT (1)	Environment	Work is also needed to develop and integrate funding routes to deliver catchment scale resilient river habitat work, including weir removals, fish passage design for <Q95 levels, cool rivers shading, bankside habitat creation, acidity control, invasive species control and, where needed, gravel management to maximise invertebrate and fisheries production. This could include stage zero river restoration schemes and could articulate well with getting rivers 'Beaver ready' where widening the space for water de-conflicts these areas if beavers colonise river reaches.	Thank you for your comment.	No change proposed.
WCRT (1)	Environment	We would suggest the WCWRG work with the Trust to create clear river by river graphics (starting with the case study areas) on the expected consumptive use on our rivers set against the environmental flows needed and guidance on what to look out for when a river is in stress so these can be used with the Trust's river community groups and incorporated into the Trusts Citizen Science Investigation program. This could also include wider initiatives such as increasing river name signage on bridges.	Thank you for your comment.	No change proposed.



Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (2)	Environment	There must be a clear plan on how the results and learning points of any studies will be shared and synthesised across the regional, given the variability of the region and the potential (or lack thereof) for generalising and information, evidence or knowledge gathered.	Thank you for your comment.	No change proposed.