



# Appendix B

**Draft Regional Plan - Table of feedback comments and our responses**



Respondent	SoR Theme	Comment	Response	Changes to be implemented to Final Regional Plan
Devon Wildlife Trust	Supply and Demand	We are pleased to see a continued focus on finding and fixing leaks. Leakage is also wasting the energy and chemicals used for abstracting, treating and pumping the wasted water through the network. Smart meters and other actions to help customers and businesses find and stop their leaks are welcome and we would like to see an even higher target of leakage reduction included.	West Country Water Resources (WCWR) are committed to implementing its leakage and demand reduction incentives.	No change proposed.
Environment Agency	Supply and Demand	Increase long-term demand reduction ambition to align with government expectations and demonstrate how you will achieve your public water supply demand management outcomes.	Thank you, West Country Water Resources (WCWR) will present its pathway to achieving our demand management outcomes more clearly within the Final Regional Plan.	West Country Water Resources (WCWR) to produce an appendix for the demand side and water efficiency options for the Final Regional Plan.
Environment Agency	Supply and Demand	WCWR's regional plan includes high reliance on demand management to maintain public water supplies, with demand management delivering 75% of the overall solution in the first five years of the plan and remains at over 50% of the solution by the end of the planning period. We consider that it could and should do more to promote the efficient use of water and reduce leakage across the region.	West Country Water Resources (WCWR) will include further details within the Final Regional Plan on the use of water efficiency schemes and leakage control across the region.	Detailed appendix containing water efficiency and demand reduction options for the Final Regional Plan.

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Environment Agency	Supply and Demand	The draft regional plan does not align with government expectations to reduce personal water use to 110L per person per day by 2050, nor does it meet the water industry's commitment to reduce leakage by 50% from 2017/18 levels by 2050.	Achieving 110 litres per person per day water use (pcc) by 2050 and reducing leakage by 50% by 2050 from a 2017/18 base level underpins the demand management element of the regional plan. The interim target for pcc published in the Government Environmental Improvement Plan (EiP) occurred at the time of publication of the Draft Regional Plan. This will be included in the final plan. West Country Water Resources (WCWR) has assumed meeting these targets in some scenarios of future water demand but also given the uncertainties around customer behaviour and leakage control has assumed meeting 50% of these targets in additional scenarios.	Include the Government Environmental Improvement Plan (EiP) water demand targets in the final plan.
Environment Agency	Supply and Demand	The level of ambition appears to be impacted by Wessex Water's view that further significant leakage reductions and water efficiency are not cost-effective. Although the draft regional plan indicates work is underway to identify routes to deliver 50% leakage reduction, no detail is given on how this will be achieved.	The Final Regional Plan from West Country Water Resources (WCWR) will draw through the flightpath to how these goals will be implemented.	West Country Water Resources (WCWR) will produce an appendix for the demand side and water efficiency options.
Environment Agency	Supply and Demand	The draft regional does not fully demonstrate how it will achieve demand reductions. WCWR has suggested in its 'optimistic policy future' that 110 l/h/d can be achieved by government policies	Thank you for your comment, this has been noted. Further work has been undertaken as part of the company draft Water Resource Management Plans (dWRMPs) which will be	Ensure that additional work is presented in the final regional plan.

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		<p>alone, although no data/evidence behind this assertion or any detailed information on how this will be delivered has been presented. The draft regional plan suggests that if the full benefits of these policies are not met, the group will look to reduce PCC with its own water efficiency options, again without supporting data/evidence to show these options and their associated benefits.</p>	<p>reflected in the Final Regional Plan publication.</p>	
<p>Environment Agency</p>	<p>Supply and Demand</p>	<p>We expect WCWR to set out a coherent and evidence-based approach to reducing water consumption. This should clearly include its own actions to deliver water efficiency, whilst considering the latest government water efficiency policy announcements in the Plan for Water. We urge WCWR to progress this and include further information in its final regional plan to demonstrate to stakeholders how all aspects of demand management will be delivered.</p>	<p>West Country Water Resources (WCWR) will ensure that the government's plan for water is reflected within the Final Regional Plan and that demand management options are fully characterised within the final submission.</p>	<p>A summary of the government's plan for water will be included within the Final Regional Plan submission.</p>

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Environment Agency	Supply and Demand	<p>We have set out our expectation through individual draft WRMPs representations that companies seek opportunities to go further and faster on demand management to meet targets. We expect WCWR to take account of this feedback and reflect it in its final regional plan. At a regional level, we challenge WCWR to do more to accelerate reductions to demand and leakage, particularly where there is a risk of environmental deterioration. We expect to see additional reductions to leakage, and to household and non-household demand in the final regional plan. We also expect WCWR to show how this will be targeted to where there is greatest risk of environmental impact from unsustainable abstraction, for example to relieve abstraction pressure in the Hampshire Avon SAC.</p>	<p>Thank you for your comment, this has been noted. Further work has been undertaken as part of the company draft Water Resource Management Plans (dWRMPs) which will be reflected in the Final Regional Plan publication.</p>	<p>Ensure that additional work is presented in the final regional plan.</p>
Environment Agency	Supply and Demand	<p>The WCWR region faces significant water supply and demand challenges over the next 25 years and the draft regional plan sets out the public water supply challenge to 2050. The draft regional plan highlights that the environment is under growing pressure in some catchments, with the demand for water outstripping available sustainable supplies and that this situation is forecast to get worse.</p>	<p>Thank you, West Country Water Resources (WCWR) recognises the extent of the challenge faced by the region over the next 25 years.</p>	<p>Update of Final Regional Plan to reflect ongoing work across the region.</p>

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Environment Agency	Supply and Demand	<p>Given demand management makes up a significant contribution to the solution for the regional plan, we recommend WCWR:</p> <ul style="list-style-type: none"> <li>• Reviews its modelling to understand whether 110 l/h/d and a leakage reduction of 50 % in a dry year by 2050 can be achieved across the region.</li> </ul>	<p>Thank you for your comment, this has been noted. Further work has been undertaken as part of the company draft Water Resource Management Plans (dWRMPs) which will be reflected in the Final Regional Plan publication.</p>	<p>Ensure that additional work is presented in the final regional plan.</p>
Environment Agency	Supply and Demand	<p>Consider additional options to reduce non-household consumption, in collaboration with retailers, including the assessment of smart metering for non-households, setting out how it is contributing to the Environment Act 2037/38 water demand target.</p>	<p>West Country Water Resources (WCWR) will revisit the demand reduction option that have been selected in both the regional plan and the Water Resource Management Plans (WRMPs) and present the current position on these within the Final Regional Plan submission.</p>	<p>Revision of the current position on non-household consumption for the Final Regional Plan.</p>
Environment Agency	Supply and Demand	<p>Set out the options required, including considering the acceleration of smart metering programmes, to meet 110 l/h/d in a dry year by 2050 if achievable. It is acceptable to include government interventions to enable some of this PCC reduction, but WCWR should clearly demonstrate the role government interventions are assumed to have in this and ensure the assumptions are robust and realistic. This should take account of the latest policies in the Plan for Water.</p>	<p>West Country Water Resources (WCWR) will update the water efficiency and demand reduction policies within the Final Regional Plan submission and provide greater details on the costings and approaches being taken to achieve per capital consumption (pcc) reduction across the region.</p>	<p>Improve water efficiency and demand reduction text to provide evidence and confidence</p>

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Environment Agency	Supply and Demand	Undertakes sensitivity testing to identify alternative options in the event the full savings from demand management strategies assumed are not fully achieved, only partly achieved, or are achieved later than planned.	West Country Water Resources (WCWR) will strive to develop a truly regional approach aligning Bristol Water, South West Water and Wessex Water to ensure a Best Value Plan (BVP) can be implemented. The start of this will be the development of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	No change proposed
Environment Agency	Supply and Demand	Consider whether an adaptive pathway plan could adapt and mitigate and provide evidence to support this decision demand metrics (including PCC) should to identify ways to adapt if needed.	Thank you for your comment, this has been noted. Further work has been undertaken as part of the company draft Water Resource Management Plans (dWRMPs) which will be reflected in the Final Regional Plan publication.	Ensure that additional work is presented in the final regional plan.
Environment Agency	Supply and Demand	Ensures there are clear thresholds and triggers for a change in strategy if demand savings are not being achieved and sets out what options would be required to mitigate the risk and whether the plan is able to adapt to this change.	Thank you for your comment, this has been noted. We will review the scenarios used in our prediction of future water resource requirements.	Review future scenarios for the final regional plan.

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Environment Agency	Supply and Demand	WCWR's draft regional plan is at a level of detail relative to the original scale of the water resources challenge understood by the region of England when the group was established in 2017/18, however now that more challenging deficits are forecast, WCWR should broaden and improve its approach to develop a plan that more effectively responds to the problems faced by all water users in the region.	West Country Water Resources (WCWR) aims to develop and improve its approach to regional planning both within the completion of the Final Regional Plan and by the development of a regional supply demand balance model, that will be available for deployment during the next round of regional planning.	No change proposed.
Environment Agency	Supply and Demand	We consider these collective issues to be unacceptable and significantly reduce the effectiveness of the consultation. For its final regional plan, we recommend WCWR provide leadership and work with Wessex Water, Bristol Water, and South West Water to: <ul style="list-style-type: none"> <li>• Review option selection at the regional level and ensure alignment of implementation dates and the benefits of PERT and Mendips Quarries with information presented in all WRMPs and the regional plan. The final regional plan should clearly demonstrate that the preferred options Environment Agency response to WCWR's draft regional plan consultation are best value for the region and are consistent with any further evidence provided in revised draft WRMPs.</li> </ul>	The Final Regional Plan from West Country Water Resources (WCWR) will draw on the advancements made in each of the Water Resource Management Plan (WRMP) revisions for publication. The options selected by each of the companies will be drawn through into the Final Regional Plan and show how their Best Value Plan (BVP) has been assigned.	Include details Final Regional Plan regarding option selection at a regional level.



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Environment Agency	Supply and Demand	As outlined in recommendations one and three, we consider increasing demand reductions and scoping additional supply side options are key mechanisms in which to bring forward environmental benefit. WCWR should use adaptive planning techniques to consider earlier delivery profiles of this abstraction reduction and demonstrate in its final regional plan that there are sufficient options available to provide WAFU benefits that can offset deployable output loss caused by abstraction reductions.	Thank you for your comment, this has been noted. Further work has been undertaken as part of the company draft Water Resource Management Plans (dWRMPs) which will be reflected in the Final Regional Plan publication.	Ensure that additional work is presented in the final regional plan.
Environment Agency	Supply and Demand	Take account of non-public water supply needs sufficiently in the regional plan WCWR has undertaken a limited review of non-Public Water Supply (non-PWS) future demands, but it has not added value to the WRNF estimates. The approach is high level and does not adequately consider or address the overall availability of water to these sectors now or in the future.	Non-Public Water Supply (PWS) use is being analysed in depth in one of the focus group catchments to identify the barriers to accurate non-PWS water use data.	The final regional plan will contain an appendix on Non-PWS use.

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Environment Agency	Supply and Demand	<p>Despite the draft regional plan recognising considerable uncertainty in future non-PWS use, setting out estimated non-PWS demands of 228 Ml/d across the region and identifying a high number of potentially unregistered water abstractors, no assessment of the current or future availability of water or potential deficits in supply has been presented in the draft regional plan. We are disappointed that this step has not been made with the information available to WCWR when producing its draft regional plan. The final regional plan should set out steps to reduce this uncertainty as soon as possible as security of water supply in the region may be impacted if not more thoroughly considered.</p>	<p>Non-Public Water Supply (PWS) use is being analysed in depth in one of the focus group catchments to identify the barriers to accurate non-PWS water use data.</p>	<p>The final regional plan will contain an appendix on Non-PWS use.</p>

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Environment Agency	Supply and Demand	We strongly encourage WCWR to continue its work to better understand NPWS in the future but there is an urgent need to elaborate upon the work already undertaken on this. We expect the final regional plan to better demonstrate the scale of the issue and the specific steps and timeframe that WCWR will follow to resolve this. Uncertainty in the amount and volume required by private supplies is of particular concern as these water users may require additional water from public water supply in the future, which may not be available unless adequately planned for the final regional plan should assess the risk through time of these non-PWS abstractors switching to mains water and estimate the impact to both non-PWS and PWS water availability.	Non-Public Water Supply (PWS) use is being analysed in depth in one of the focus group catchments to identify the barriers to accurate non-PWS water use data.	The final regional plan will contain an appendix on Non-PWS use.
Environment Agency	Supply and Demand	Reviewing the WCWR plan, the supporting data tables and the relevant water company draft WRMPs indicates that the required abstraction reductions are not being planned quickly enough to meet this requirement. The plan must be reviewed to eliminate any delays in implementation and a clear narrative must be included to explain the decisions made around the timing of implementation and demonstrate that	When the draft regional plan was published the abstraction reductions had been identified but funding not secured. The programme of investigation will be part of the Water Industry Environment Programme (WINEP). Details on the timing of investigations and then planned infrastructure to facilitate reductions will be presented in the final Plan.	Details of the timing of investigations and then planned infrastructure change to facilitate abstraction reductions will be presented in the final plan.

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		implementation will be “as soon as practicable”.		
Environment Agency	Supply and Demand	When a region or water company supplies another water company with a bulk supply transfer, it must demonstrate that it has taken account of the impact of its abstraction on water body objectives, including deterioration risk. If the final draft regional plan includes new or amended transfers, WCWR must show that the risk of deterioration due to increased abstraction in the donating company’s water resource zone has been fully considered. The plan must also consider whether the transfer would impact delivery of water body objectives in the donating company’s water resource zone.	Thank you for your comment, these concerns will be addressed in the publication of the final Water Resource Management Plans (WRMPs) that each of the three water companies are producing.	Details of the significant transfers proposed as part of the Strategic Resource Options (SROs) being developed will be included in the final regional plan.



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Environment Agency	Supply and Demand	Although effort has been made to understand the current needs and vulnerabilities of non PWS sectors in the region, the draft regional plan does not present any assessment of future demands or potential deficits in these catchments or any other catchments in the region. This is disappointing and something we recommend WCWR addresses in its final regional plan using the data and information it has available.	Non-Public Water Supply (PWS) use is being analysed in depth in one of the focus group catchments to identify the barriers to accurate non-PWS water use data.	The final regional plan will contain an appendix on Non-PWS use.
Environment Agency	Supply and Demand	The draft regional plan states it will estimate the shortfall in abstraction for agricultural users, but no timeframe is provided for this. Because of the lack of an informed forecast, the regional plan is unable to identify or resolve any potential future supply shortfalls for non-PWS water users. The draft regional plan was supported by data tables to set out non-PWS demand forecast, but a flat 0.38% growth factor has been used to derive the forecast from the current estimate of need without any description of justification. This growth factor is highly unlikely to be appropriate for all sectors and adds little value to NFWR estimates.	The growth factor used by West Country Water Resources (WCWR) was based on a national projection in the absence of a regional agricultural water resource management plan.	No change proposed.

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Environment Agency	Supply and Demand	<p>We strongly encourage WCWR to undertake further work in time for the final regional plan to better understand wider water needs now and in the future across the region. This was a central objective in the NFWR and we are disappointed that despite undertaking engagement with other sectors and securing consultancy support, the region has not attempted to identify, assess or resolve both short and long-term water availability. To move this forward, we strongly encourage WCWR to use the information it has available to assess available water supplies and non-PWS demand at the catchment level and identify if there is likely to be sufficient supplies for all water users. Not undertaking this work may present a risk to future supplies where demand outstrips supply. The draft regional plan does not address this risk as presented and may inhibit economic growth if not further considered.</p>	<p>Non-Public Water Supply (PWS) use is being analysed in depth in one of the focus group catchments to identify the barriers to accurate non-PWS water use data.</p>	<p>The final regional plan will contain an appendix on Non-PWS use.</p>

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Environment Agency	Supply and Demand	In your next regional plan, we expect you to have also considered the resilience needs of other sectors and identified clear options to address any water supply issues, subject to the appropriate funding arrangements being confirmed. WCWR should do this through targeted engagement specific to the issues in the region. This should include the consideration of licence capping on non-PWS water users and its impact on water availability across the region.	Thank you for your comment, this has been noted.	No change proposed.
Environment Agency	Supply and Demand	We expect your final regional plan to demonstrate how WCWR has taken account of non-PWS regional plan response consultations. The region should continue to work closely with other water users and ensure they have opportunity to have an active role in the finalisation of the regional plan. The final regional plan should also set out a detailed roadmap for wider water user engagement, to ensure improved data and information is available for its next regional plan.	Thank you for your comment, this has been noted.	The final regional plan should also set out a detailed roadmap for wider water user engagement, to ensure improved data and information is available for its next regional plan

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Environment Agency	Supply and Demand	As WCWR does not have a regional supply model and is aggregated from component water company approaches, it is important that any revisions to supply forecasts or methods is reflected in assumptions that are made at a regional plan level and explained in the final regional plan as appropriate. In addition, the draft regional plan does not fully reflect experiences from the drought event of 2022, and we recommend that WCWR works with its member water companies to ensure that this is reflected in final regional plan.	West Country Water Resources (WCWR) will ensure that lessons learnt from the 2022 drought and water company approaches to supply modelling are provided within the Final Regional Plan.	A summary of the 2022 drought will be included within the Final Regional Plan submission.
Environment Agency	Supply and Demand	The narrative of the plan also sets out different futures to achieve the core government objectives of 50% leakage reduction and an average household per capita consumption of 110 l/h/d but in contrast, the supporting regional plan data tables show neither of these objectives will be met by 2050. This conflict causes confusion over which demand management outcomes are being planned for. We noted in draft WRMP feedback that we expect all water companies to plan to meet these objectives. In its final regional plan, we also expect WCWR to take account of the latest government policies, signposted in the Environmental Improvement Plan,	The leakage reduction and water saving targets will be aggregated from the final Water Resource Management Plan 2024 (WRMP24) submission and will outline the pathway West Country Water Resources (WCWR) will take to meet the reduction targets outlined. The final regional plan will include the Government Environmental Improvement Plan (EiP) water demand targets.	West Country Water Resources (WCWR) to produce an appendix for the demand side and water efficiency options.



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		and the Environment Act water demand target of distribution input per head of population.		
Environment Agency	Supply and Demand	We remain concerned about the lack of supply-side options, the lack of assurance that demand targets will be met, and that WCWR has not produced a preferred regional plan. RAPID, on behalf of the regulators, raised concerns and sought assurance on continued momentum of WCWR’s regional planning effort.	West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.	Further explanations on selected options will be included within the Final Regional Plan.

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Environment Agency	Supply and Demand	<p>As presented in draft WRMP preferred plans<sup>8</sup>, leakage reductions contribute ~600 MI/d and consumption reductions account for ~1325 MI/d of demand savings by 2050 across England. Delivering these savings is vitally important providing security of water supplies amid the challenges of population growth, climate change, environmental improvement, and improved resilience to drought. This is particularly important for WCWR as it is almost wholly reliant on demand reductions to maintain public water supplies in the first half of the planning horizon. Non-delivery of these demand reductions will pose a risk to the security of supplies in many parts of the region if not addressed. The draft regional plan also does not demonstrate sufficient adaptability if these are not achieved at the pace expected. WCWR should assess and prepare for the risk that the pace of planned demand reductions up to 2035 are not achieved, setting out what mitigating options could be brought forward to maintain resilience and continue to deliver environmental commitments.</p>	<p>West Country Water Resources (WCWR) will be drawing on the three Water Resource Management Plans 2024 (WRMP24) final submission to ensure all public water supplies are secured over the planning horizon.</p>	<p>Collation of Water Resource Management Plan (WRMP) outcomes to ensure security of water supply over the planning horizon.</p>

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Environment Agency	Supply and Demand	<p>In its final regional plan, WCWR should set out an ambitious timetable for scoping a much larger number and range of additional options, which should include appraising a wider range of options including desalination, mine water re-use, third party, catchment based and non-PWS derived options. This appraisal must be completed before its next major decision-making milestone. As outlined in recommendation three, WCWR's final regional plan should include a challenging and detailed timeline for the specific activities it will undertake to ensure that additional options will be appraised and considered before its next decision-making milestone. This should include the engagement it will undertake with a range of water users and stakeholders to better understand future water needs, to ensure that a larger suite of options is able to address any forecasted shortfalls. Wider option availability should also enable more timely delivery of the regional environmental destination as set out in section five.</p>	<p>Thank you for your comment, this has been noted. Further work is currently being undertaken on the final list of options that will be provided within the Final Regional Plan publication.</p>	<p>Further options details will be included within the Final Regional Plan submission.</p>

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Environment Agency	Supply and Demand	It is imperative that the final regional plan is a best value, preferred and adaptive regional plan. The draft regional plan consulted on provides little reassurance that this will be delivered. WCWR's draft regional plan sets out a basic decision-making approach that does not appear to have added any value to the individual water company WRMPs derivation of a preferred programme. Whilst not described in the draft regional plan, we understand that WCWR are developing a regional level decision making model for use in its next regional plan. This is a positive step that we support, but we urge the regional group to consider how it can better demonstrate how regional level decision making has influenced the outcomes selected in its final regional plan.	Until the Regional System & Investment Model is built a true Best Value Plan (BVP) will not be possible, but we will endeavour to use all three Water Resource Management Plans (WRMPs) to develop the best plan possible with the information we have.	Develop a best value plan for the final regional plan from the three final regional water company Water Resource Management Plans (WRMPs).
Environment Agency	Supply and Demand	Smaller options within water company WRMPs are not adequately presented or considered in the draft regional plan and do not appear to have featured in regional level decision making.	West Country Water Resources (WCWR) will include smaller in-company options within the regional level decision making for the Final Regional Plan.	The range of options will be included in the Final Regional Plan



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Environment Agency	Supply and Demand	<p>WCWR has significant further work to do to better understand and address the region's longer-term needs. The group must improve parts of its regional plan to demonstrate that it has a preferred suite of solutions that are best value for the region, and that the environment and security of supply are protected. We are expecting the final regional plan to provide benefits sooner to the region's sensitive designated sites, including the Hampshire Avon SAC, and increase its ambition to reduce demand. Although it has identified options to meet a range of deficits, it has not delivered a regional strategic plan with a preferred adaptive solution.</p>	<p>Until the Regional System &amp; Investment Model is built a true Best Value Plan (BVP) will not be available for the final submission, but we will endeavour to use all three Water Resource Management Plans (WRMPs) to develop the best plan possible with the information available to the region.</p>	<p>Adaptive plan to be included in the Final Regional Plan together with an up-to date plan at the time of publication for abstraction reductions.</p>
Historic England	Supply and Demand	<p>There is variability in the level of ambition within water companies' dWRMPs in relation to demand management and leakage reduction. Historic England supports the commitment within plans to progress demand side measures, in line with government requirements, recognising that supply side projects will sometimes involve major infrastructure proposals with potentially major impacts on the environment including heritage. We therefore strongly encourage the Region to adopt an ambitious approach to demand side measures across all water company areas.</p>	<p>Thank you, West Country Water Resources (WCWR) recognises the ambition of its demand reduction targets and the investment required to achieve these.</p>	<p>No change proposed.</p>

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Historic England	Supply and Demand	<p>In relation to supply side options, the dWRMPs also vary in the amount of information provided about specific infrastructure proposals and in the assessment of their heritage impacts. As a general point, we consider that more information is needed, both on the nature of individual schemes, and on their potential heritage impacts and benefits. As we have highlighted earlier in our response, paragraph 2.5.7 of the NPS states that 'Any option included in a final water resources management plan will need to consider feasibility and reliability as well as taking account of potential environmental and social impacts. To reduce the potential for Plans to select preferred options that will meet obstacles in later consenting processes, it is important that options are transparent, are subject to a heritage impact assessment at the plan making stage, that proper consultation is carried out on these options, and that this informs the selection of sites to go forward to the final published plan.</p>	<p>West Country Water Resources (WCWR) will make it clear within the Final Regional Plan that heritage impacts will be assessed within any proposal to develop future supply options across the region.</p>	<p>Summary of heritage impacts to be included from the Final Regional Plan developments.</p>

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Horticultural Trade Association	Supply and Demand	The Draft West Country Water Resources Plan refers to the need for greater efficiency, which the horticulture industry can achieve through use of water harvesting via rainwater or grey water recycling, however, to be able to do this, investment in equipment and technology is needed.	West Country Water Resources (WCWR) welcomes the willingness for the Horticultural sector to engage with the regional planning process and would be supportive in assisting in obtaining funding for technological investment.	No change proposed.
MoP 1	Supply and Demand	In relation to demand reduction targets question 4a: Too little, too late? Water consumption has been consistently below 100 l/p/d at this address for a number of years, without really making much effort to be frugal.	The regional water consumption data suggests more work is needed across the West Country. The West Country sees high consumption levels of water during the summer months, the large concentration of tourists within the region makes water consumption more difficult to control with metering incentives than a typical household and more work is required to ensure West Country Water Resources (WCWR) can make an impact on these properties to reduce consumption.	No change proposed.
MoP 1	Supply and Demand	In relation to balance of demand management / new resource options 6a: The balance is right.	Thank you for your comment.	No change proposed.

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MoP 1	Supply and Demand	I am not alone in thinking that there is still too much general public complacency over water supply in this country. Government and water companies alike should be stressing the need to treat water as a precious resource, to be used frugally and returned to the environment in a condition that makes it suitable for further use, by humans or wildlife, as necessary. Retrofitting meters on older properties with a mains water supply should be a priority. Rainwater harvesting systems should be mandatory on all new developments, perhaps with the “leaky” water butts being trialled by Southern Water.	West Country Water Resources (WCWR) aims to improve water efficiency across the region and bring water scarcity and value to the forefront of everyone's mind. WCWR has proposed a number of water resource options that focus on reducing the total amount of water that we all use daily and reducing the amount of water lost to leakage within the region.	We will set out within our Final Regional Plan the actions we will take to deliver a step change for the next Regional Plan, including an integrated Regional EBSD (Economics of Balancing Supply and Demand) model and water resource model.
Natural England	Supply and Demand	A balance does need to be struck between water supply and environmental restoration; some environmental requirements are more clearly defined and less flexible than others. These relative priorities need to be thoroughly considered going forward and we appreciate that this requires joined up discussions with local Environment Agency and Natural England.	Thank you, West Country Water Resources (WCWR) welcomes further discussions around environmental restoration of catchments and the environmental requirements for water within them.	No change proposed.
NFU	Supply and Demand	The NFU agrees that reducing demand will support water efficiency across the West Country, however in an area with increasing population, tourism and risk of drought, particularly in Devon and Cornwall, it is important to ensure that	West Country Water Resources (WCWR) is committed to reducing leakage inline with its leakage ambition targets. Maintenance and renewal of the current asset base is key to achieving this target.	No change proposed.



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		<p>reduction in demand does not impact food production. To manage leakage reduction successfully, it is important that the wider infrastructure is maintained. Often leakages are repaired, and other leaks appear nearby, and further repairs are required. If PWS invested more into preventing wastage within the networks, this would help support a reduction in water demand.</p>		
NFU	Supply and Demand	<p>The WCWRG Regional Plan discusses creating an action plan to reduce business water consumption. What support does WCWRG aim to provide farmers and landowners that water demand needs could increase in climate change? The plan should ensure that all opportunities are created in a multi sector way to ensure that the full potential of those opportunities are realised, for example a construction of a reservoir could have opportunities for all sectors in providing access to water, protecting and enhancing the environment and wider benefits. The NFU itself is promoting a number of steps that we believe are needed to build water resilience in agriculture. These include proper maintenance of the current drainage system to hold more water; improvements to soil health; help with grants and overturning bureaucracy associated will</p>	<p>West Country Water Resources (WCWR) is supportive of the moves National Farmers Union (NFU) has made to encourage water supply reliance within the agricultural sector. However WCWR cannot provide these options from public water supply projects.</p>	<p>No change proposed.</p>

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		<p>building on-farm water storage; grants and advice on water efficiency techniques (water recycling on farm, low input irrigation techniques) and making more of our on-farm groundwater resources.</p>		
<p>NFU</p>	<p>Supply and Demand</p>	<p>The WCWRG Draft Regional Plan has been read in conjunction with the water company WRMP's (Water Resource Management Plans) that are currently available; South West Water, Bristol Water and Wessex Water. All the WRMP's highlight the need to ensure there are demand and supply side options. For instance, the South West Water WRMP states that they will 'identify all the options that are available to help us resolve expected differences between supply and demand and test them to determine those that provide the best value.' Once a clear understanding of future demand is known, we are keen to see the adoption of a multi sector approach that see all sectors and PWS managing both demand and new supply options. It is important that all options are</p>	<p>West Country Water Resources (WCWR) recognises the importance to the food production industry for maintaining access to the water it needs to operate. However, supply options are funded by the supply of public drinking water and are not able to provide security to third party industries for their long term planning aims at nil cost.</p>	<p>No change proposed.</p>

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		constructed and designed with multi sector at the fore.		
NFU	Supply and Demand	In the WRMPs demand options focus on metering, leakages and efficiency. Supply side options look at transfers, reservoirs and water re-use. There are practical limitations to how quickly solutions can be implemented when reductions are demanded. Across these demand management activities, the importance of water for food production must be recognised, the recent Government Food Strategy highlighted the importance of domestic food production, maintaining our productive capacity and growing more food in this country.	West Country Water Resources (WCWR) recognises the importance of food production to the region and the UK. Further collaboration and partnership with the National Farmers Union (NFU) and its members would improve the regional understand of the efforts needed to maintain this into the future.	No change proposed.

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
NFU	Supply and Demand	A secure supply of water is essential for food security. The NFU Integrated Water Management Strategy states that farmers have much to offer in the development of an integrated water management strategy. Farming plays a key role in flood management and has a role to play in protecting and enhancing our water environment along with providing substantial environmental benefits and ecosystem services.	West Country Water Resources (WCWR) would welcome the inclusion of wider participation between the regional planning group and the National Farmers Union (NFU) and its members.	No change proposed.
NFU	Supply and Demand	The NFU asks that the WCWR Regional Plan looks to provide a detailed understanding of the deficits that the agricultural sector faces across the South West.	West Country Water Resources (WCWR) is working to understand the position local abstractors face on a catchment level through the Catchment Focus programs. This work will be shared with local stakeholders once complete.	West Country Water Resources (WCWR) to continue the development of the Focus Catchments.
OFWAT	Supply and Demand	Options sufficiency – the plan is not clear which options have been considered and is inconsistent with the supporting data tables. It does not provide sufficient and convincing evidence that additional options have been included since the emerging plan stage and therefore the concerns we raised previously about options sufficiency remain. WCWR should improve on this for its final plan and for the longer term, noting that an increased range of options could have implications for scaling, timing or selection of large infrastructure projects.	Further explanations on selected options will be included within the Final Regional Plan.	Further explanations on selected options will be included within the Final Regional Plan.

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		<p>WCWR should make sure the final plan is consistent with any supporting data.</p>		
OFWAT	Supply and Demand	<p>Ambition – WCWR has not detailed how it will achieve its demand management targets despite our feedback on the emerging plan stressing the importance of providing extra detail in this area to give confidence on delivery.</p>	<p>West Country Water Resources (WCWR) will provide extra detail within the Final Regional Plan drawing upon the plans presented by the regions water companies.</p>	<p>West Country Water Resources (WCWR) will provide extra detail within the Final Regional Plan.</p>
OFWAT	Supply and Demand	<p>We are still seeing insufficient options scoped in many draft plans. We understand this is linked to the significantly increased water needs the draft plans are seeking to meet. However, water companies, and regional groups, need to develop new and innovative options to demonstrate that the proposals they are putting forward are optimal. This has been reinforced by our review of option costs in the draft WRMPs which has found some companies with notably</p>	<p>Thank you for your comment, this has been noted.</p>	<p>No change proposed.</p>





Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		high unit costs that suggest decision-making models have insufficient options to work with.		
OFWAT	Supply and Demand	Deployable output: WCWR has not provided detail on the methods or modelling used to calculate available water, known as deployable output (DO). The plan is missing technical reporting on the approach used. WCWR should present its method for calculating deployable output up to a 1 in 500 year level of drought resilience in its final plan.	Water Resource Management Plan (WRMP) Models have been amalgamated for the Draft Regional Plan, an appropriate explanation of these will be included within the Final Regional Plan.	Further work to be included on the deployable output methodology used.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT	Supply and Demand	WCWR has provided supporting data tables. However, we have concerns that it has not considered the full range of options that are presented in those tables. The options in the data tables appear to be a summation of the company options and are not described in the draft plan. WCWR has not provided a description of the regional options identification process, including how the zonal benefit assumptions of the options were used for screening and optimisation. WCWR should clearly identify the options selected in the preferred plan and provide sufficient and convincing evidence that the options selected are best value in its final plan.	West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.	West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.
OFWAT	Supply and Demand	WCWR should update the regional plan to ensure it is consistent with the supporting data tables. The plan should include the full range of feasible options to ensure a sufficiently wide range of options are included in the regional planning process (as detailed in our feedback on the emerging plan) and describe the appraisal process for the selection of the preferred plan and least cost plan. A broad range of comparable options is required to develop an optimised programme and to provide viable alternatives across the region.	West Country Water Resources (WCWR) recognises that full and complete data tables will be required for the final submission of the Final Regional Plan, the options selection process and least cost plan elements will be included within this submission.	West Country Water Resources (WCWR) will ensure final data tables are submitted with greater consistency and more robust method of working employed.



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OFWAT	Supply and Demand	WCWR has stated its water needs are 180 MI/d by 2050 under baseline assumption scenarios. However, it is difficult to determine whether WCWR has sufficient options to meet the planning problems it faces as the figures presented in the draft plan do not align with the data tables. WCWR should update the regional plan to ensure consistency between the regional plan, data tables and company WRMPS	West Country Water Resources (WCWR) will work towards further aligning the Draft Regional Plan with the selected options as we move to submitting the Final Regional Plan.	For Final Regional Plan we will include our proposals for monitoring of progress towards ambition.
OFWAT	Supply and Demand	In line with the UK government's strategic requirements for Ofwat, we expect companies, working as part of regional groups, to reduce demand for water to relieve pressures on water supply and increase resilience to extreme drought. We expect companies to use these regional plans to adhere to demand targets including: <ul style="list-style-type: none"><li>• halving leakage across the industry by 2050, in comparison to 2017/18 levels;</li><li>• reducing personal consumption to 110 litres per head per day (l/h/d) by 2050.</li></ul>	West Country Water Resources (WCWR) are committed to meeting both the leakage reduction targets and the reduction in personal water consumption across the region.	No change proposed.



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OFWAT	Supply and Demand	WCWR has stated in the plan that it has not yet obtained any third party options for the region, but are promoting opportunities via the WCWR website. However, the regional planning tables include three third party preferred options and four third party feasible options. WCWR should clarify whether third party options were investigated and revise the regional plan regarding the inclusion of third party options so that it is consistent with the regional planning tables.	West Country Water Resources (WCWR) will revise these elements in the Final Regional Plan.	A review of these elements for all the options in the context of strategic planning.
OFWAT	Supply and Demand	A further target, set in the Environment Act 2013, also now requires the use of public water supply in England per head of population to reduce by 20% from the 2019 to 2020 baseline reporting year figures, by 31 March 2038, and we expect regional groups to demonstrate how they will deliver against this target in their final plans.	Thank you for your comment, this has been noted.	No change proposed



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT	Supply and Demand	It is important that plans are sufficiently ambitious and likely to achieve agreed outcomes. As we said above, Ofwat expects companies to use these regional plans to adhere to demand targets including personal consumption, leakage and overall water use. WCWR has taken on board some feedback in this area. For example, we previously noted that the Radford option has been approved as part of the green recovery and that its benefits should be reflected in the baseline water needs assumptions. WCWR has taken on board this feedback and included Roadford in its baseline.	West Country Water Resources (WCWR) will ensure the Final Regional Plan is ambitious and works to achieve an effective outcome for the region.	Further developments of the work streams associated with the regional planning approach and the alignment of the Water Resource Management Plans towards the Final Regional Plan submission.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT	Supply and Demand	WCWR notes that government policies will heavily influence the level of personal consumption achieved by 2050. However, it does not explain what assumptions it has made. WCWR has not added detail on its approach to water efficiency since the emerging plan despite our feedback on the importance of providing extra detail in this area to give confidence on delivery. Our feedback does not appear to have been acted upon in this area and further detail is required to give the final plan credibility. While WCWR has discussed options for managing water demand in business (non-household demand) it has not included any costs for these options or used them to develop a credible approach to managing demand. These should be provided in the final plan.	Water efficiency progress will be drawn through from the work that has been undertaken on a company level and presented within the Final Regional Plan publication.	Updates to the water efficiency programs to be included within the Final Regional Plan publication.
OFWAT	Supply and Demand	WCWR aims to halve leakage by 2050 from a 2017-18 baseline. However, it has not yet developed a plausible or costed route to achieving this which is required and should be included in the final plan.	West Country Water Resources (WCWR) will draw on the plans outlined by the individual water companies to present a fully costed roadmap to leakage reduction.	Inclusion of leakage reduction pathway and costs associated with meeting the reduction targets.





Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT	Supply and Demand	WCWR should set out in its final plan how it will align with the government target to reduce the use of public water supply in England per head of population by 20% from the 2019 to 2020 baseline reporting figures, by 31 March 2038, with interim targets of 9% by 31 March 2027 and 14% by 31 March 2032, and to reduce leakage by 20% by 31 March 2027 and 30% by 31 March 2032.	Thank you for your comment, this has been noted. Further work has been undertaken as part of the company draft Water Resource Management Plans (dWRMPs) which will be reflected in the Final Regional Plan publication.	Ensure that additional work is presented in the final regional plan.
OFWAT	Supply and Demand	Profiling activity across the planning period: WCWR has not developed credible approaches for increasing water efficiency or managing leakage. These are a pre-requisite for then profiling the approaches over time and across the region to develop an optimised strategy. WCWR should develop this further for its final plan.	West Country Water Resources (WCWR) will update the water efficiency and demand reduction policies within the Final Regional Plan submission.	Improve water efficiency and demand reduction text to provide evidence and confidence
OFWAT	Supply and Demand	Most regional groups and companies are planning to meet government targets for leakage and personal consumption although there are some exceptions that cause concern. However, we are still seeing a lack of robust and tailored glidepaths to meet those targets and our concerns remain around the deliverability of demand management strategies. Without robust testing and tailoring of demand management strategies within and between companies we cannot be confident we are seeing optimal	West Country Water Resources (WCWR) will update the water efficiency and demand reduction policies within the Final Regional Plan submission.	Improve water efficiency and demand reduction text to provide evidence and confidence

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		proposals. We have previously highlighted the opportunity for companies to deliver non-household demand management and our expectations that company plans deliver significantly improved levels of water efficiency in the business sector. We expect to see ambitious strategies for non-household demand management in the final regional plans and associated WRMPs. We also expect to see companies delivering on the commitments they made in WRMP19 and PR19 and this should be the starting point for these plans.		
OFWAT	Supply and Demand	WCWR should set out, in its statement of response, what improvements are possible for the final plan. It should also explain how the next iteration of the plan will bring about a step change and provide sufficient and convincing evidence to inform the strategic decisions that are coming, such as the potential development of the Mendip Quarries option.	Thank you for your comment, this has been noted.	No change proposed.
South West Rivers Association	Supply and Demand	It is apparent that the 2022 drought necessitates rethinking on the Supply/Demand challenges and the need to build in contingency planning to deal with uncertainty over future impacts of climate change, population growth, tourist numbers and environmental needs.	West Country Water Resources (WCWR) recognises the significance of the 2022 drought and the impacts it had upon the region. The group will provide an update within the Final Regional Plan on the lessons learnt and how water resource planning will	The Final Regional Plan submission will include a summary of the lessons learnt and the changes implemented as a result of the 2022 drought.

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
			aim to reduce the effects of such events in the future.	
South West Rivers Association	Supply and Demand	Non-Public Water Supply Demands: Recognition of the need to include these in future planning is very welcome. Although some of them, eg aquaculture, may be non-consumptive they can have detrimental environmental and fisheries impacts which can be exacerbated by consumptive water supply abstractions. With climate change it is probable that abstraction for irrigation will increase which will necessitate increased off-stream storage.	Thank you for your comment.	No change proposed.
South West Rivers Association	Supply and Demand	There is so much uncertainty about both demand reduction and leakage reduction that modelling of various scenarios should be included. The use of mandatory restrictions eg Hosepipe Bans is controversial as shown by recent media coverage of the Roadford Supply Zone Hosepipe Ban.	West Country Water Resources (WCWR) highlighted the impact a scenario where only 50% of these goals were achieved within the Draft Regional Plan, these uncertainties will be further highlighted in the Final Regional Plan submission.	No change proposed.

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
South West Rivers Association	Supply and Demand	If a 'sustainable public water supply' includes environmental sustainability then the assertion that the region currently has a sustainable supply is wrong. If it were fully sustainable there would be no need for Drought Orders which damage the environment including fisheries or Hosepipe Bans which adversely impact on domestic customers and in extremis on business customers.	West Country Water Resources (WCWR) is pursuing the achievement of 1 in 500 year drought resilience across the region. This aim will be achieved by introducing new sources of water supply, reducing leakage and water demand. This in turn will reduce the need for drought orders across the region.	No change proposed.
South West Rivers Association	Supply and Demand	The references to reducing Environmental Vulnerability are very welcome but can only be met by ensuring adequate resources dedicated to the environment, especially the needs of rheophilic flora and fauna such as migratory salmonids. Resources for environmental protection should not be seen as an easy target at times of supply stress by the excessive use of Drought Orders	West Country Water Resources (WCWR) recognises the concerns that are held for the protection of the aquatic environment. The plan sets out the regional goals for securing water resources in a 1-500 year drought return period without the need for drought orders to be imposed, this is to be achieved by increasing the total amount of water available from sustainable water sources.	No change proposed.
Wiltshire County Council	Supply and Demand	Wiltshire has a range of environmentally sensitive assets which we need to protect, not least the Hampshire Avon Special Area of Conservation (SAC) and its chalk streams. In this context, a proportion of new development is being planned for to meet the needs of settlements such as Salisbury, Warminster, Amesbury and a large rural area representing a significant demand	West Country Water Resources (WCWR) understands your concerns. The protection of the Hampshire Avon SAC is important and is part of the Environmental Destinations (ED) work programme agreed between the water companies and the Environment Agency to ensure that sufficient water remains in the environment. In parallel with the ED programme additional strategic water resource options	No change proposed.

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		for additional water, all from within the Hampshire Avon catchment.	(SROs) are being developed (currently in assessment phase) to provide additional water to meet population growth, the challenge of climate change and where abstraction reductions are needed for environmental resilience. The SROs assessments are being reviewed and approved by the relevant regulators as they progress. In addition WCWR are working with the regions water companies to improve the interconnectivity of the water distribution system to ensure that water can be moved around the region to meet future demands.	
Wiltshire County Council	Supply and Demand	The Regulation 19 version of the Wiltshire Local Plan Review will be published in draft later this year and this will contain development proposals looking to 2038. This period is roughly commensurate with the medium-term situation outlined within WCWR draft plan, when additional new water supply resources and a greater focus on water efficiency is recognised as being needed to meet future environmental and demand requirements.	West Country Water Resources (WCWR) recognise the sensitivity of Wiltshire County Councils environmental assets and is working within the Hampshire Avon to improve the resilience of the environment and reduce pressures from abstractions. The Poole effluent reuse scheme aims to improve water availability within the local area while maintaining a higher level of environmental wellbeing.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (1)	Supply and Demand	Alongside wider public demand management the Trust is also well placed to work with non-domestic sectors to reduce demand and this could easily form part of the rivers trust wide Replenish approach increasing water audit and efficiency measures. It is a lot easier for a third party to do this compared to the water company due to conflict of interest with retail for business, especially in the farming sector.	Thank you for your comment, this has been noted.	No change proposed.
WCRT (1)	Supply and Demand	This is the direction of travel needed but the scale of ambition needs to be met through a broad integrated campaign linking water companies, Catchment Partnership and environmental NGOs. This could be done by expanding broader community schemes looking at Water Quality, such as the Trusts Citizen Science Investigation scheme. Work with the Trust's InnWater project to increase engagement between Catchment Partnerships and feed Citizen Science water quality data into the WCWRG so it can be understood alongside quantity.	Thank you for your comment, this has been noted.	No change proposed





Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (1)	Supply and Demand	Currently, significant focus is made of the technical single focus siloed solutions but a sustainable public water supply must include comprehensive multi benefit environmental sustainability. There is a lot of focus in the plan on engineered solutions such as water shunting, quarry reuse and desalination, but considerable work is needed to reverse the catchment changes seen over the last 50 years and this aligns with multiple interests including water company drinking water and waste water drivers as well as Risk Management Authority flood drivers.	West Country Water Resources (WCWR) hopes to engage further in the restoration of catchments across the region and investment into nature based solutions. However, the water deficit across the region poses a risk that requires a large response in the form of capital investment into engineered water supply assets and greater connectivity across the region for increased resilience to a changing climate and an increase in water demand.	No change proposed.
WCRT (1)	Supply and Demand	Additionally, reliance on technical solutions for both supply and demand should be supplemented more fully with the use of Nature Based Solutions. Included within the plan needs to be the challenge of delivering new community-led, partnership delivered Nature Based Solutions funded across multiple silos that have different planning cycles, funding requirements and delivery windows. Specific attention needs to be paid to Nature Based Solutions being designed out at the long list stage due to their uncertainty in modelling and focus switched to proportionate monitoring, reporting and verification of outcomes.	Thank you for your comment.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (1)	Supply and Demand	There is limited information on the Colliford Supply Zone and, given its importance to Cornwall, this seems an omission. It is perhaps understandable given the limited ability to shunt water eastwards but more attention is needed to understand the deficit and the need to draw on water from the east through the Roadford Supply Zone during high tourist times.	The specific solutions for the SWW Colliford WSZ are covered in the SWW WRMP. Since the publication of the draft plan further ongoing work by WCWR and SWW includes the development of desalination to support the Colliford WRZ directly and investigates the movement of water from the SROs in the east into the SWW WRZs.	Updates to the Final Regional Plan on regional water resources development and water transfers within the region will be included.
WCRT (1)	Supply and Demand	We agree whole-heartedly that we need significant reductions in demands across all sectors, but we are deeply concerned that the current level of understanding and integration is insufficient to predict the exact level of pressure on our rivers. There is significant uncertainty about both demand reduction and leakage reduction and clearer modelling is needed to show the likelihood of meeting ambitions. A more strategic long-term proactive public information campaign is needed.	West Country Water Resources (WCWR) is currently conducting its Focus Catchment work across a number of pilot catchments to attain the current and future impacts on changes to abstractions and future water uses on water courses and their environments. These catchments will be further expanded once the pilots have concluded to build a deeper regional understanding on the effects all abstractions have within each of the catchments and the impact proposed changes and behaviours will have on them.	West Country Water Resources (WCWR) to continue the development of the Focus Catchments.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (1)	Supply and Demand	As the Trust's remit is to protect the rivers of the west country AND educate the public in water management we are well placed to help reduce demand but this has to be done as part of an integrative approach to demonstrate the impacts communities have either by how much water they consume or what they do with it once used. The Trust is concerned that the public perception of the water industry may cloud their engagement and the messaging of use less water when customers pay per volume a harder message to portray than the message the Trust uses of "Use less water as it's on loan from the river".	Thank you for your comment, this has been noted.	No change proposed
WCRT (1)	Supply and Demand	Work with the Trust to set up regional demand management programme where we work with community river groups to drive local campaigns and funding drives to reduce usage as well as increase and normalise re-use of water. This could include wider elements such as Yellow Fish campaigns to show which drains lead to the river rather than waste water treatment works as well as the use of Citizen Science Investigations into water quality.	Thank you for your comment, this has been noted.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (2)	Supply and Demand	<p>The proposed "Production of an action plan to reduce business water consumption." seems disproportionate in its ambition in comparison to the new supply side options. Will businesses be encouraged to identify their own alternative/'renewable' sources of water alongside demand reduction options in order to maximise flexibility and resilience through a more hybrid centralised/decentralised system? Otherwise, how can 'best value' options be determined within the confines of such a limited approach, which remains siloed to the water sector and does not diversify beyond the status quo of the centralised (not-fit-for-[Future]-purpose) system? Additionally, are WCWR Group pushing back against central policy and regulation that is becoming not-fit-for-[Future]-purpose?</p>	Thank you for your comment, this has been noted.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
WCRT (2)	Supply and Demand	<p>More extensive consideration of direct potable effluent reuse (including coastal/estuarine), decentralised water reuse, sewer mining and rainwater harvesting – this may come in future Plans given the statement on pg 25-26; but there must be no complacency or u-turning on that. Table 8 details that even in USA and Australia direct reuse is rare but there are other countries where it is very common, such as Singapore (30% of water supply) and Israel – where 85% of reclaimed water is used in agriculture. As agriculture is a major non-public water supply risk in the WCWR area there are lessons to be learned, transposed and implemented on this ASAP (through collaborations, which WRT can facilitate) – it would be advisable for a project exploring this to be entered into the RAPID pipeline ASAP (short-term, Phase 1). There seems to be appetite for this as illustrated in Figures 16 and 17 (pgs 51-52), which shows NHH treated effluent reuse provides the highest saving for the second highest cost (performs better than ‘sector specific water efficiency advice’, which is most costly). This would also help interconnect riverine agricultural pollution issues with sewage pollution issues and potentially address two issues with one investment (increase water supply resilience, increase river/raw water</p>	<p>Thank you for your comment, this has been noted.</p>	<p>No change proposed to the final regional plan.</p>

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		<p>quality), which would seem to better represent 'best value'.</p>		
WCRT (2)	Supply and Demand	<p>Inconsistencies with the Regional Plan and the water companies' DWMPs – for example the draft Regional Plan states: “We have not investigated desalination in detail and consider it to be an option of last resort for the South West. Desalination plants have a high carbon footprint and high maintenance costs when only operating intermittently to meet demands during times of water scarcity. In addition, they generate a highly saline waste stream which is difficult to dispose.” As noted in footnote 32, the draft South West Water DWMP states that several locations along the Cornish coast are being considered for</p>	<p>The desalination consideration being undertaken by South West Water was a development that was still an uncertainty at the time of publishing the Draft Regional Plan. These new potential options will need to be assessed in full at the company level and secondly in the regional context prior to their inclusion in the Final Regional Plan.</p>	<p>West Country Water Resources (WCWR) to update the final list of options being considered within the Final Regional Plan and an inclusion of an options technical appendix.</p>



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		desalination plants and this has also been in the press recently so is public knowledge.		
WCRT (2)	Supply and Demand	The Pessimistic Policy Led option for household PCC reduction is most realistic given current policy, movement and capacity in the sector.	Thank you for your comment.	No change proposed.
WCRT (2)	Supply and Demand	As mentioned throughout this response, water reuse is both new resource and demand management and should be at the core of the Regional Plan and the water companies' DWMPs.	West Country Water Resources (WCWR) recognises this statement and endorses this within the Final Regional Plan.	No change proposed.
Waterwise	Supply and Demand	page 49 (52 on the PDF of the RP) says you have not included the cost of reducing leakage - a key element of demand reduction plans. The plan says that it will be updated for the draft plan in Summer 2022? This seems to have been	West Country Water Resources (WCWR) recognise this error and will include the cost elements for leakage and water efficiency options within the Final Regional Plan submission.	West Country Water Resources (WCWR) will re-work the Final Regional Plan and remove errors.

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		a vital oversight and leads the reader to lack confidence in the document.		
Waterwise	Supply and Demand	It reads that the way you have framed the water efficiency section is from a premise that 110 lppd can be achieved by policy alone. You have based this on an Artesia report from 2019, but do not include a link or appendix to be able to read this. We would not expect policy changes alone to deliver 110lppd. As you can see in the UK Water Efficiency Strategy to 2030 the objectives and actions set out show we need a wide range of actions in order to reduce demand for water.	Thank you for your comments. If a future reference is made to the Artesia 2019 report a correct reference will be provided.	No change proposed
Waterwise	Supply and Demand	We have serious concerns about the framing of your approach to demand management in this way. The other regional plans have set out what they think they can realistically achieve and then added on the policy as extra savings and we would strongly advocate for this approach for your final plan.	Thank you for your comment, this has been noted. WCWR will derive what can be achieved from the three regional water company water resource plans.	Set out national framework targets and whether these can be achieved versus what is realistic in the scenarios to be used for the Final Regional Plan.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Waterwise	Supply and Demand	<p>You then add in some water company actions on the basis that the policy led water savings fail to deliver or might not all happen. While we welcome some of the options included here - there is limited information. For example, although we are pleased to see smart metering referred to in several places in the draft plan there is no clarity on the scale or pace of proposed roll-out in the region. This needs to be addressed in the final plan with a timeline to roll out new smart meters and/or convert existing meters to smart meters for HH and NHH customers across the whole WCWR region; as we have seen in the WRE draft plan.</p>	<p>West Country Water Resources (WCWR) will provide further details in the Final Regional Plan from the Water Resource Management Plan 2024 (WRMP24) process on the water efficiency and demand reduction options included within the Draft Regional Plan.</p>	<p>Appendix for demand management options will be included within the Final Regional Plan.</p>