



Appendix B

Draft Regional Plan - Table of feedback comments and our responses
Theme: Strategic Resource Options

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
CLA	SROs	The CLA believes that desalination must only be undertaken when plentiful renewable energy is available. Careful cost-benefit analysis is required to minimise the contribution of expensive desalination plants to climate change. We agree that the concentrated saline output from desalination needs careful disposal to minimise ecological harm. Desalination plants must not interfere with ecologically sensitive coastal habitats, flood defences, and/or carbon sequestration.	WCWR agrees that the environmental assessment of any new resource options must be undertaken in the most sensitive and environmentally sound manner with all the relevant regulators approval.	No change proposed.
CLA	SROs	In preference, the CLA supports water recycling to recharge river headwaters. We welcome the water recycling plant proposed at Poole, and believe this type of technology could be extended at a variety of scales. Abstraction from the river mouth can also be used to recharge aquifers and groundwater, as demonstrated by the Felixstowe Hydrocycle scheme in Suffolk.	West Country Water Resources (WCWR) experienced a rapid shift in its water resilience position between the inception of the regional group and the publication of the Draft Regional Plan. The group is committed to exploring new and effective water resource options across the catchment. The Poole effluent recycling scheme was put forward to the RAPID (Regulators' Alliance for Progressing Infrastructure Development) process as it met the water volume requirements to become a Strategic Resources Option (SRO). Further	No change proposed.

			waste water recycling options may become apparent at the company level as we move into the next planning cycle.	
CLA	SROs	The CLA recognises that a wide envelope of future water use scenarios exist, with large uncertainty surrounding trends in working-from-home, and that sparsely populated geographical areas in the West Country make it difficult to develop regional water resources. However, we would urge WCWR to consider developing new supply-side options in order to avoid placing additional stress on water for food production and to provide more water for conservation in future. This is particularly relevant given WCWR's finding from its focus groups that household consumers are sceptical about per capita reductions. Developing new water supplies will become more important the larger the magnitude of the abstraction reduction from the Avon.	West Country Water Resources (WCWR) understands the Country Land and Business Association (CLA) concerns and will continue its engagement with the agricultural sector relating to water supply for food security across the region.	No change proposed.
CLA	SROs	Multiple quarries at the end of their lives in the Mendips could be investigated for suitability as reservoirs, rather than a single one. These would have tourism, recreational and biodiversity	The Mendip Quarry Strategic Resource Option (SRO) scheme is being considered as a phased approach with a single quarry being targeted initially and further quarries undergoing assessment for feasibility at a later date.	No change proposed.

		benefits, and be highly land-efficient as reservoirs.		
CLA	SROs	<p>Smaller-scale infrastructure can come online more quickly, and should feature within the plan. Options include:</p> <ul style="list-style-type: none"> • Smaller water recycling projects, which can recharge rivers and groundwater higher up their courses using water from river mouths, following the model of the Felixstowe Hydrocycle scheme in Suffolk. • Rainwater harvesting and grey water reuse in housing estates, roads, and other urban areas, using water from Sustainable Drainage Systems filtered through reedbeds and other nature-based treatments before reuse. • Private water distribution networks between landholdings so that the currently licenced abstraction volume can be deployed more effectively on farms. 	A wider range of smaller non-strategic resource options have been considered within the company Water Resource Management Plans (WRMPs) which will be explored further in the Final Regional Plan submission to show options which are more rapidly deployed on a local level.	No change proposed.
Devon County Council	SROs	It also seems strange that South West Water's (SWW) proposals to abstract from quarries and build desalination plants in Cornwall are not mentioned. Overall, Devon and Cornwall seem under-represented in this plan.	When the draft regional plan was published the proposals for desalination and other quarry abstractions that were not as developed as those for Cheddar 2 Reservoir, Poole water recycling and Mendip Quarry strategic resource options. Since publication further work has been undertaken on both resource options in Devon and	A future review of the options included within the draft Water Resource Management Plans (WRMPs) will be conducted for the Final Regional Plan submission.

			Cornwall and the transfer of water from the east of the region west.	
Devon County Council	SROs	There appear to be no additional supply measures outlined for Devon and Cornwall, despite a number of options identified by SWW in its draft Water Resources Management plan. Whilst new water supply infrastructure can be controversial, there is a basic environmental principle to supply water from a source as close as possible to increase resilience and reduce carbon emissions from pumping. We would not support the routine reliance on water moved between counties, whilst we understand that it may be necessary in extreme situations.	Water resource resilience is a key concern for West Country Water Resources (WCWR). The connectivity of the West Country to improve the ability of water to be moved throughout the region is a key objective for WCWR, as the nature of the West Country and the limited size of catchments makes the placement of large water resource options challenging.	No change proposed.

Devon Wildlife Trust	SROs	As already stated, movement of water between catchments and across regions should be done with caution and following suitable environmental assessments. More can be done to store good quality water within catchments including promoting healthy soil husbandry and adoption of Farming Rules for Water and sensitive farming practices, wetland creation and ponds on farm (although to achieve multiple benefits, these should be wildlife friendly ponds with sloping natural edges rather than uniform containers of water).	WCWR agrees that the environmental assessment of any new resource options must be undertaken in the most sensitive and environmentally sound manner with all the relevant regulators approval, and we recognise the need for management of water at a local scale to provide resilience for the environment and the agricultural sector.	No change proposed
Devon Wildlife Trust	SROs	Moving water from one catchment to another can have a detrimental impact on the natural environment. Water compatibility is not mentioned in the plan and is important to consider. The biodiversity thriving in one catchment may not be the same as another catchment due to differing levels of minerals etc so this needs to be taken into account and water moved only as a last resort. Restoring quarries to hold more water locally can be a good solution, particularly if the restoration works are sensitive. Meeth Quarry near Hatherleigh is a good example.	The movement of water will follow the relevant legislation from the Environment Agency (EA) on invasive species, water will be treated at source and moved as potable or near potable bulk exports across the region to minimise the impacts of transfers.	No change proposed.

Environment Agency	SROs	Ensure consistency of option selection profiles for all preferred options of the regional plan with water company WRMPs and the gated process for Cheddar 2	West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.	Further explanations on selected options within the Final Regional Plan will be provided.
Environment Agency	SROs	The implementation profile for the region's two SROs, Poole Effluent Recycling and Transfer (PERT) and Mendip Quarries, differs significantly in the regional plans and individual WRMPs, with a discrepancy of implementation dates of 10 to 25 years between the plans. The MI/d benefits of these SROs are also represented inconsistently between water company WRMPs and the draft regional plan.	West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.	Further explanations on selected options within the Final Regional Plan will be provided.
Environment Agency	SROs	The omission of Cheddar 2 in water company WRMPs is inconsistent with its selection in the draft regional plan and information presented in the SRO Gate 2 submission. For Cheddar 2 to progress through the gated process, there should be robust justification for its selection in the regional plan and all water company WRMPs.	West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.	Further explanations on selected options within the Final Regional Plan will be provided.

Environment Agency	SROs	<p>These are the largest options set out in the draft regional plan and the extent of inconsistency does not provide assurance that these options have been thoroughly considered and appraised. It is also likely to impede stakeholder understanding of the proposals across the region. Representation of SROs must be consistent between all relevant plans, and WCWR's final regional plan must align with water company final WRMPs in both the plan narrative and supporting data tables. We expect WCWR to provide leadership to address this issue and work with South West Water, Wessex Water, and Bristol Water to ensure this is the case. It should also ensure any further changes to WRMPs are represented consistently in WCWR's final regional plan.</p>	<p>West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.</p>	<p>Further explanations on selected options within the Final Regional Plan will be provided.</p>
Environment Agency	SROs	<p>Promote additional supply options to meet current and future water needs. The draft regional plan does not set out sufficient alternative options that could be developed or utilised if the SROs or demand management options are not delivered at the expected volumes or timescales.</p>	<p>West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.</p>	<p>Further explanations on selected options within the Final Regional Plan will be provided.</p>

<p>Environment Agency</p>	<p>SROs</p>	<p>Non-delivery of any combination of larger options may present a risk to security of public water supply and/or the environment. WCWR's draft regional plan highlights that Colliford water resource zone will be in deficit for two years at the start of the planning period without the use of emergency drought orders (EDOs). It is not possible to conclude that WCWR has presented a best value regional plan as so few strategic schemes appear to have been scoped. Linked to recommendation two, there is also inconsistency in representation of these options that must be resolved for the final plan. There is further inconsistency with the data tables which list a range of supply options, none of which appear in the regional plan.</p>	<p>Since the publication of the draft regional plan there has been additional water resource 'options' work undertaken that will be reported in the final draft regional plan and final WRMP submissions. The most upto date information relating specifically to Colliford water resource zone will be available in South West Water's updated draft Water Resources Management Plan to be published in early October 2023. With the committed development of the regional water supply model and the EBSD (Economics of balancing supply and demand) element WCWR will be able to develop a best value plan for the second regional water resource plan.</p>	<p>Ensure water resources options are updated and data consistency in the final regional plan data tables.</p>
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<p>Environment Agency</p>	<p>SROs</p>	<p>We recommend WCWR works with the region’s water companies to scope, appraise, and promote additional supply-side options so they can form viable alternative options. These options should include a broader range of option types, including additional desalination, minewater re-use, third party, non-PWS, or catchment options. We expect WCWR’s final regional plan to bring forward new and existing options where these form part of a best value plan or are needed as alternatives to manage risks to security of supply and the environment in its preferred programme. It should also set out additional adaptive pathways that consider non-delivery of SRO schemes.</p>	<p>West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.</p>	<p>Further explanations on selected options within the Final Regional Plan will be provided.</p>
<p>Environment Agency</p>	<p>SROs</p>	<p>We expect WCWR to continue to work with neighboring regional groups to explore and confirm the costs and benefits of trades between the regions and to keep this under review as the development of the next regional plan gets underway. We encourage WCWR to keep its decision to continue existing bulk supply arrangements and transfers between regions under review.</p>	<p>Thank you for your comment, it has been noted and West Country Water Resources (WCWR) will continue to support the regional reconciliation process as part of the delivery of the national water resources framework.</p>	<p>No change proposed</p>

<p>Environment Agency</p>	<p>SROs</p>	<p>The narrative and data of the draft regional plan data does not demonstrate that the Hampshire Avon SAC will not see an increase in abstraction, that potentially in turn has an adverse effect on site integrity. Furthermore, the draft regional plan does not demonstrate that demand generated from local growth is not being supplied in preference to reducing abstractions sooner, which may potentially impact the Hampshire Avon SAC. Failure to meet requirements for protected sites will impact the environment. This also risks ‘water neutrality’ being implemented, which constrains growth and conflicts with water resources planning guidance. We noted this in our draft WRMP feedback for Wessex Water, and we expect the final regional plan to reflect meeting these objectives. Interim measures such as abstraction incentive mechanism schemes and demand reductions should be outlined that minimise impacts on the SAC while abstractions that potentially impact the site persist.</p>	<p>WCWR (West Country Water Resources) understand that Wessex Water were only made aware of the risk of water neutrality being implemented following the publication of their draft Water Resources Management Plan. Wessex Water’s revised draft water resources management plan sets out a demand reduction strategy from 2025 targeted in the Hampshire Avon catchment to minimise impacts on the (Special Area of Conservation) SAC river whilst supply side investments are developed, and further investigations are undertaken in the catchment to gain a holistic understanding of future needs, so that the right supply-side investments are made to meet all needs, including those of the MoD and Veolia water. To steer this, Wessex Water have set up an Upper Hampshire Avon Water Resources Steering group to coordinate understanding of need, and of the identification of the right solutions to be delivered for 2035.</p>	<p>Ensure that the plans to meet abstraction reduction in the Hampshire Avon are upto date at the time of publication of the final regional plan.</p>
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Environment Agency	SROs	<p>We support the pilot catchment approach developed by WCWR. These reports provide a good overview of issues, opportunities and outcomes in a catchment and can be used to continue working towards the best value solutions for people and the environment in these areas. We see these reports as the local counterpart to the strategic scale solutions developed through the regional plan. We encourage WCWR to continue with this approach and to prioritise further catchments for this detailed work, taking account of our advice on catchments where environmental destination issues need to be resolved as a high priority.</p>	<p>West Country Water Resources (WCWR) is considering the future of Focus Catchment approach.</p>	<p>West Country Water Resources (WCWR) to review the focus catchment approach in next steps.</p>
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<p>Environment Agency</p>	<p>SROs</p>	<p>We also understand from liaison with the group that additional larger supply-side options are being considered for development, but these also don't feature in the regional plan. In addition to smaller schemes, these new, larger schemes will likely influence the preferred programme and WCWR should keep this under review frequently and provide a summary on this development in its final regional plan. Linked to recommendation three, it will also be difficult to conclude that WCWR's regional plan is best value for the region because we consider that it has not identified a sufficient range of supply-side options to demonstrate it has appraised all options available to resolve shorter- and longer-term water needs in the region.</p>	<p>West Country Water Resources (WCWR) will include further explanations on selected options within the Final Regional Plan report.</p>	<p>Further explanations on selected options within the Final Regional Plan will be provided.</p>
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Environment Agency	SROs	<p>As part of our ongoing work on a national system simulation model (NSSM), we have assessed the early themes from phase 3 of this programme against regional plan outcomes. This work assesses drought resilience in England and the performance of SROs in offsetting public water supply deficits. Early phase 3 results indicate that some SRO solutions and/or drought measures may be needed earlier than proposed in current regional plans/WRMPs, and that improving connectivity within regions and/or between SROs would benefit drought resilience. As well as improving drought resilience, bringing online supply side schemes earlier and/or improving connectivity may also enable environmental benefits to be delivered sooner where needed. We aim to publish phase 3 outcomes in August 2023 and encourage regional groups to work with us to continue improving this model to refine data inputs and system representation.</p>	<p>Thank you for your comment, it has been noted.</p>	<p>No change proposed.</p>
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Historic England	SROs	In relation to the SROs, section 7.1.3 of the draft Regional Plan acknowledges that 'In addition, to the benefits that will be enabled, each option will come with its own adverse impacts, and cumulative effects and opportunities'. An associated commitment is made that 'Collating the results of the option level environmental assessments to form an assessment of whether the plan delivers a net environmental gain or not will form part of the next stage of regional plan development'. While we welcome this commitment, it is disappointing that the potential adverse impacts and benefits identified in Table 10 make no reference to heritage, and we recommend that this is addressed through inclusion of a broad statement such as 'impacts on heritage assets and their settings'.	Thank you for your comment, West Country Water Resources (WCWR) will include the broad statement 'impacts on heritage assets and their settings' suggested by Historic England to the table.	West Country Water Resources (WCWR) to include summary for impacts on heritage assets and their settings.
Historic England	SROs	We also wish to highlight paragraph 2.5.7 of the NPS which 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'. We believe that more needs to be done by the West Country water companies to meet this requirement in relation to the is	West Country Water Resources (WCWR) will look to include an outline of how the historic environment will be addressed by regional water planning.	West Country Water Resources (WCWR) to include summary of historic environment within the Final Regional Plan.

		historic environment. By doing so, the water companies can help to ensure that preferred options are deliverable.		
Historic England	SROs	Historic England’s guidance The Historic Environment and Site Allocations in Local Plans sets out a suggested approach to site selection which takes account of the historic environment. It is also important that a degree of heritage impact assessment is undertaken at plan making stage. In doing so, in order to take account of unrecorded and non-designated archaeology, the relevant Historic Environment Records should be referred to, and the views of local authority archaeological advisers sought.	West Country Water Resources (WCWR) will look to include an outline of how the historic environment will be addressed by regional water planning within the Final Regional Plan.	West Country Water Resources (WCWR) to include summary of historic environment within the Final Regional Plan.
Historic England	SROs	In relation to the SROs which are progressing through the RAPID/Ofwat gated process, given the significant scale of these proposals we suggest that all three should be subject to heritage impact assessment in advance of the selection of options for inclusion in final WRMPs. For example, in relation to Mendip Quarries and associated transfers there is potential for significant heritage impacts within the Mendip Hills, River Avon catchment, Bath springs or other areas. While we welcome an	West Country Water Resources (WCWR) will ensure that regional and local heritage are taken into consideration during the planning phase of any Strategic Resource Option (SRO) that is to be deployed in the region.	No change proposed.

		initial approach to Historic England for advice in relation to this SRO, more detailed site-specific information is required, particularly in relation to the routing of any pipelines.		
Historic England	SROs	We welcome the assessment of cultural heritage as a topic area within Strategic Environmental Assessments. However, we consider that where potential impacts on the historic environment have been identified, and for all Strategic Resource Options, more detailed heritage impact assessments should be carried out to inform option selection and mitigation.	West Country Water Resources (WCWR) understands these concerns and will undertake these assessments once the development of the Strategic Resource Options (SROs) becomes clearer.	No change proposed.
Historic England	SROs	In relation to the assessment of heritage impacts, where impacts are identified as relating to 'construction' or to 'operation', in the former case it should be recognised that these impacts cannot always be treated as temporary/short term. For example, the direct physical impact of a pipeline on buried archaeology during construction (or indeed the direct impact of infrastructure on any heritage asset) is likely to be permanent and irreversible. In the case of setting impacts resulting from construction activities, while it may be more common for these to	Thank you for your comment, West Country Water Resources (WCWR) will take the necessary steps to ensure the protection of the historic environment during the construction of any new assets.	West Country Water Resources (WCWR) to include summary of historic environment within the Final Regional Plan.

		be temporary, certain impacts such as the loss of mature trees to allow for installation of a pipeline, may result in setting impacts that persist for some decades.		
Historic England	SROs	The dWRMPs associated with this Regional Plan contain many supply side options and include three Strategic Resource Options (SRO) to deliver regional benefits. These are the Cheddar 2 Reservoir and associated transfer, Mendips Quarry Reservoir and associated transfers, and the Poole Effluent Re-Use scheme. Within the draft Regional Plan and water companies' dWRMPs, there is currently some variability in messaging about which SROs will be required, and how these will be prioritised.	The final publications of the Final Regional Plan and Water Resource Management Plans (WRMPs) will see alignment on the implementation of the Strategic Resource Options (SROs) across the West Country.	No change proposed.
Historic England	SROs	At this stage, the assessment of historic environment impacts and benefits associated with SROs and other options (whether in dWRMP Strategic Environmental Assessments, or Gate papers associated with SROs) is generally high level/broad brush and therefore both inconclusive and difficult for Historic England to validate. In determining which options should be taken forward into final plans, we	The heritage impacts of the Strategic Resource Options (SROs) will be addressed once the options have been evaluated and moved past the concept stage of development.	No change proposed.

		therefore urge the water companies to give fuller consideration to the potential for heritage impacts and enhancements.		
MoP 1	SROs	In relation to the question do you support the idea of developing supply options, the respondent answered: Yes	Thank you for your comment.	No change proposed.
MoP 1	SROs	What strategies might be employed to retain more water within the catchment areas of our upland reservoirs, for slow release through the summer? Many of them have very “flashy” feeder streams, resulting in rapid oscillations of reservoir level. Regardless of how wet a winter may have been, the following summer may see water levels falling low enough to cause concern, as we have seen in recent years.	WCWR welcomes your comment and supports the retention of water in upland areas as this has benefits for both environmental resilience and also carbon capture when peatland areas are involved.	No change proposed.

Natural England	SROs	Natural England does agree with the point made several times that all users of water need to contribute to the challenge of leaving adequate water for the environment in the future. As well as applying to abstraction for agricultural irrigation, and the need for greater water storage generally, water level management operations, such as those on the Somerset Levels and Moors, also seem relevant. We believe that Environment Agency and Natural England have a key role to play here.	Thank you for your comment.	No change proposed.
NFU	SROs	The NFU supports the need to expand strategic water supply infrastructure as critical response to climate change and population growth. However, it is critical that the importance of water to build resilience in our domestic food production systems is recognised and the NFU believes that farming businesses must be able to benefit from the additional water resources that new reservoirs will provide. Furthermore, it is important that the design and implementation of new water supply infrastructure and reservoirs does not have an adverse impact on farming businesses and should be carried out in a way that minimises the impact on land	West Country Water Resources (WCWR) will continue its engagement with the National Farmers Union (NFU) and landowners to keep them involved in the decision making process.	No change proposed.

		ownership and farming operations. We ask that WCWRG continues engagement with landowners to ensure they are actively involved in the decision making at all stages.		
NFU	SROs	For the proposed new reservoirs, assurances must be made to show that water company licences for reservoir refilling will not restrict access to water for other abstractors, including under circumstances where licences or permits are capped or revoked to meet future environmental objectives.	West Country Water Resources (WCWR) proposed supply option are to be situated only in areas where water has been identified as available for new abstraction licences.	No change proposed.

OFWAT	SROs	Cheddar Two - we are concerned that the Cheddar Two solution is not selected in the preferred plan in the regional planning tables, or the company preferred plans despite being in the Regulators Alliance for Progressing Infrastructure Development (RAPID) gated programme. If there is a strong needs case, we expect the final regional plan to set this out with sufficient and convincing evidence of need.	West Country Water Resources (WCWR) inclusion of Cheddar Two will be addressed in the publication of the Final Regional Plan to align with the position of RAPID (Regulators' Alliance for Progressing Infrastructure Development) and the final Water Resource Management Plans (WRMPs).	West Country Water Resources (WCWR) will provide an appendices to the Final Regional Plan for the supply options and Strategic Resource Options (SROs).
OFWAT	SROs	The WCWR plan considers three SRO supply schemes, Mendip Quarries, Poole effluent recycling and Cheddar Two which provide a total gain of 75.5 Ml/d for the dry year annual average in 2050. However, the WCWR data table shows that Cheddar Two is not selected in the preferred plan, Ofwat core pathway or least cost plans.	West Country Water Resources (WCWR) inclusion of Cheddar Two within the data tables will be completed for the submission of the Final Regional Plan and its data tables.	West Country Water Resources (WCWR) will provide an appendices to the Final Regional Plan for the supply options and Strategic Resource Options (SROs).

OFWAT	SROs	<p>Wessex Water and Bristol Water are co-sponsors of the Cheddar Two reservoir solution in the Regulators Alliance for Progressing Infrastructure Development (RAPID) gated process. We are concerned that the solution is not selected in the preferred plan in the regional planning tables, or the company preferred plans. Despite the draft WRMPs not including any evidence of need, the RAPID programme is being asked to consider the recommendation to progress Cheddar Two beyond the current RAPID gate two development stage. This would result in customers continuing to fund the development of a scheme that is not needed according to the latest published evidence. If there is a strong needs case, we expect the final regional plan to provide sufficient and convincing evidence of this.</p>	<p>West Country Water Resources (WCWR) has consulted with the constituent water companies with regards to these Strategic Resource Options (SROs) schemes and requested they consult with OFWAT and the Environment Agency on how they are to be included within final Water Resource Management Plans (WRMP). These decisions will be pulled through into the Final Regional Plan tables to reflect the changes made.</p>	<p>West Country Water Resources (WCWR) to ensure data tables at company Water Resource Management Plans (WRMP) level are aligned with Final Regional Plan data tables.</p>
OFWAT	SROs	<p>Regional plans and WRMPs set out the need for strategic infrastructure and the RAPID programme is intended to advance these projects so they can be implemented in a timely way. Cheddar Two is not currently in either the regional or company plans and cannot qualify for advancement without a robust justification of need.</p>	<p>The Cheddar Two Reservoir option will be included within the final submissions of Water Resource Management Plans (WRMPs) and the Final Regional Plan submission.</p>	<p>West Country Water Resources (WCWR) to include the updated Water Resource Management Plans (WRMPs) and Final Regional Plan together with data tables will be provided.</p>

South West Rivers Association	SROs	The proposed increased use of Pumped Storage of reservoirs to increase capacity depends on further abstraction from rivers but the draft Plan refers to reduced abstraction – this needs clarifying by reference to Abstraction Licence conditions which protect river flows. The only increased abstraction shown on the Plan is from the Bristol Avon!	Seasonal variations in pumping i.e. pumping large volumes of water in the winter during periods of peak flow and providing compensation flows during the dryer summer months will minimise the environmental impacts of further abstractions from the environment.	No change proposed.
South West Rivers Association	SROs	The Plan shows a reservoir to the North of Exeter – is this a new reservoir? The proposed use of Smarter Licensing to increase drought resilience and reduce the impact on the environment at times of stress is welcome provided it does not focus on the former at the expense of the latter.	The reservoir highlighted on Figure 13 from the Draft Regional Plan is a water service reservoir for storing potable water that is already in operation.	No change proposed.
South West Rivers Association	SROs	There is no inclusion of any proposals in the Colliford Supply Zone which is surprising given the ongoing publicity/ hosepipe ban. Also reference to Desalination as a 'last resort solution' is at odds with recent SWW publicity – see 4b below re the need for more a more strategic communications plan.	The specific solutions for the SWW Colliford WSZ are covered in the SWW WRMP. The inclusion of desalination to support Colliford WRZ was a decision taken by SWW to ensure resilience of supplies in the difficult peninsular geography of Cornwall.	The role of desalination within the region will be provided in the final plan.

<p>South West Rivers Association</p>	<p>SROs</p>	<p>The Plan showing the future development of resources appears very skewed towards the East of the Region with nothing in the Colliford Supply Zone which is already under stress. The Plan refers to the need to protect the chalk aquifers in and to the East of the Region but this must not be at the expense of the equally valuable and vulnerable surface water rivers in the centre and West of the Region many of which include SSSI's and SAC's</p>	<p>The level of environmental protection of all the rivers in the WCWR area is set by the environmental regulators and set out in legislation. Our environmental destination for the region is driven by this and is region wide. The strategic resource options (SROs) are located in the east of the region for a number of differing reasons which include availability of future water resource to ensure resilience of scheme, scale and delivery cost effectiveness and stage of development at the time of preparing the draft regional plan. These SROs link with plans to integrated major water distribution to enable the movement of water from the east to the west to build a more resilient water resource base across the whole region.</p>	<p>No change proposed.</p>
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<p>South West Rivers Association</p>	<p>SROs</p>	<p>Why is the recycling of effluent from Poole STW's the only such proposal when there are several larger STW's across the Region which could be included?</p>	<p>The option of recycling effluent has not been fully explored across the whole region. The Poole scheme provides the opportunity to develop the necessary technologies, understand more accurately the costs involved in developing and operating such plants as well as the strict development and operational regulatory requirements. In light of this the Poole scheme offers the opportunity for future water recycling options to be considered across the region with greater certainty in particular if future regional and water company water resource plans extend the planning horizon beyond the current 25 years to 2050 to 45 or 50 years to 2075 or 2080.</p>	<p>The future option of water recycling schemes to be included in the final plan.</p>
<p>WCRT (1)</p>	<p>SROs</p>	<p>The plan centres around moving and storing water resource within the east of the region and does not highlight the importance of creating more storage across all areas to both increase local supply but allow for movements of water from west to east and east to west. The Coliford Supply Zone is a good example of this as the increase in tourists, who are arguably more challenging to manage in terms of demand reduction at key low flow periods.</p>	<p>West Country Water Resources (WCWR) are aiming to increase the connectivity of the region to enable resilience in supply from the transfer of water across the region from areas where new options development are more readily available to those where new option development are more difficult.</p>	<p>No change proposed.</p>

WCRT (2)	SROs	Unless they are [SROs] robustly and thoroughly assessed against water reuse measures of a similar scale (such as sewer mining/direct potable reuse), it is not possible to determine whether they are the 'best value' or most resilient strategic supply options.	West Country Water Resources (WCWR) welcomes your comment and agrees that water re-use options will become more frequent in water resource options in the future. It is important that the technologies and costs needed to deliver such schemes are understood, in addition to the acceptability of such schemes as 'sewer mining' to customers.	No change proposed.
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