



# Appendix C

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



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
<b>Environment Agency- Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	Regional Plan driving fully integrated WRMPs	It is not possible to provide a top-down plan for this round of planning. Developing the required level of integrated modelling in the given timescale is unrealistic. The Final Regional Plan will include a more robust assessment of regional needs which will be developed through the finalised Water Resource Management Plans (WRMPs) and input into the regional plans including more evidence of key infrastructure needs and the timing of their delivery.	Present an updated and more rigorous version of the strategic-level plan presented within the Emerging Plan for consultation.
<b>Environment Agency- Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	Fully account for existing environmental requirements as well as aspirations for the future. In particular, the need to prevent WFD deterioration and to protect all waterbodies. This includes those outside of the identified focus catchments.	The Draft Regional Plan included the December 2022 Environmental Destination (ED) positions for the three constituent water companies as it was understood at the time.	The Final Regional Plan will confirm the position of each of the companies and their agreed Environmental Destination reductions.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Environment Agency-Emerging Plan	Best Value Plan (BVP) and decision making	Provide a best value plan will lead to a single, preferred solution, with adaptive pathways and triggers clearly defined, integrating large and small options that resolve deficits	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.	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.
Environment Agency-Emerging Plan	Best Value Plan (BVP) and decision making	Include more technical detail to support confidence in delivery of the regional plan	West Country Water Resources (WCWR) drew through further details into the Draft Regional Plan from the Water Resource Management Plans (WRMPs)	West Country Water Resources (WCWR) will include more technical details within the Final Regional Plan submission by including a number of technical appendices.
Environment Agency-Emerging Plan	Best Value Plan (BVP) and decision making	Clearer description of the links between WRMPs and the Regional plan	West Country Water Resources (WCWR) will continue to work together to ensure alignment between Water Resource Management Plans (WRMPs) and the Regional Plan. The same teams are responsible for delivery of both plans.	No change proposed to the Final Regional Plan due to be published in December 2023. Alignment of the Water Resources Management Plans has commenced with draft Water Resources Management Plans for 2024 work to complete this process with the Water Resources Management Plans for 2029 and the second iteration of regional plan will continue.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Environment Agency- Emerging Plan	Best Value Plan (BVP) and decision making	Additional detail required for Demand management options	West Country Water Resources (WCWR) updated the data used within its future scenarios regarding the leakage and demand management options selected within each companies Water Resource Management Plan (WRMP) submission.	Methods will be fully explained in the Water Resource Management Plans (WRMPs) and summarised in a separate appendix for the submission of the Final Regional Plan.
OFWAT - Emerging Plan	Best Value Plan (BVP) and decision making	Regional Plan driving fully integrated WRMPs.	It is not possible to provide a top-down plan for this round of planning. Developing the required level of integrated modelling in the given timescale is unrealistic. The Final Regional Plan will include a more robust assessment of regional needs which will be developed through the finalised Water Resource Management Plans (WRMPs) and input into the regional plans including more evidence of key infrastructure needs and the timing of their delivery.	Present an updated and more rigorous version of the strategic-level plan presented within the Emerging Plan for consultation.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
<b>OFWAT - Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	The progress WCWR has made against the five headings included within our emerging plan feedback (assessment of water needs, options to meet water needs, decision making and prioritisation, ambition and outcomes and stakeholder engagement).	Progress against these areas will be outlined in our Final Regional Plan, including the dependencies upon the development of regional model that has been commissioned.	Next steps and progress to be included in the Final Regional Plan.
<b>OFWAT - Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	Presentation of a single adaptive best-value plan including detailed costs, benefits, and trade-offs.	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.	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.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
<b>OFWAT - Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	How the WCWR regional plan adds meaningful benefit / value to the company WRMPs	The West Country Water Resources (WCWR) plan has been constructed using a bottom-up approach, taking its inputs from the constituent water companies Water Resource Management Plans (WRMPs) and using this information to draw a regional outlook for the West Country. WCWR will 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
<b>OFWAT - Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	Clearer description of the links between WRMPs and the Regional plan.	West Country Water Resources (WCWR) works to ensure alignment of the individual companies Water Resource Management Plans (WRMPs) and the Final Regional Plan.	Further alignment of the Water Resource Management Plans (WRMPs) and Final Regional Plan submission.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
<b>OFWAT - Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	How are metrics being used to optimise plans?	West Country Water Resources (WCWR) have expanded options since the Emerging Regional Plan and will develop screening criteria as part of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	No change proposed.
<b>OFWAT - Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	Has the best value decision making process been revisited and is it now in line with Section 9 and 10 of the WRPG?	West Country Water Resources (WCWR) will develop a regional approach aligning Bristol Water, South West Water and Wessex Water to ensure a Best Value Plan (BVP) can be implemented. The start of this will be the development of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow. As this is developed it will align with current guidance and regulation.	No change proposed.



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OFWAT - Emerging Plan	Best Value Plan (BVP) and decision making	How are metrics being used to optimise plans?	West Country Water Resources (WCWR) have expanded options since the emerging plan and will develop screening criteria as part of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	No change proposed.
OFWAT - Emerging Plan	Best Value Plan (BVP) and decision making	Has the planning horizon been revisited - is 2050 long enough given the deficits faced in the long term and strategic options required to meet the need from the 2040s onwards?	The Water Resource Management Plans (WRMPs) of the three companies work to 2050 (South West Water) and 2080 (Bristol Water and Wessex Water). 2050 gives enough time for Environmental Destination (ED) reductions, and plans for new strategic resources to be confirmed. Extending the timescale further can be addressed during the AMP8 (AMP - Asset Management Plan) which covers the period 2025-2030 and work on the next company and regional water resource management plan process for 2029.	No change proposed.





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OFWAT - Emerging Plan	Best Value Plan (BVP) and decision making	How will the regional plan inform the company WRMPs? How does the regional plan add benefit / value to the company WRMPs	The West Country Water Resources (WCWR) regional plan has encouraged the development of an integrated water resource management plan for the region and the transfer of water within the region between Bristol Water, South West Water and Wessex Water. To ensure a future regional Best Value Plan (BVP) can be implemented, work is commissioning experts to develop a Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	No change proposed.
OFWAT - Emerging Plan	Best Value Plan (BVP) and decision making	What is the extent and breadth of sensitivity testing planned?	The West Country Water Resources (WCWR) regional model will as it is developed build and include sensitivity criteria.	No change proposed.
OFWAT - Emerging Plan	Best Value Plan (BVP) and decision making	Clearer description of the links between WRMPs and the Regional plan.	West Country Water Resources (WCWR) will continue to work together to ensure alignment between Water Resource Management Plans (WRMPs) and the Regional Plan. The same teams are responsible for delivery of both plans.	Further alignment of the Water Resource Management Plans (WRMPs) and Final Regional Plan submission.



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OFWAT - Emerging Plan	Best Value Plan (BVP) and decision making	What is the carbon approach within best value planning?	Carbon is an important aspect which West Country Water Resources (WCWR) takes very seriously. Carbon and the cost of carbon will be incorporated into the regional modelling and Best Value analysis for the next iteration of the regional plan.	Ensure carbon is discussed in the Final Regional Plan.
OFWAT - Emerging Plan	Best Value Plan (BVP) and decision making	We are concerned that time is now very tight and a lot remains to be done.	In comparison with other regions West Country Water Resources (WCWR) is the newest and least developed of the regional groups and this was reflected in the maturity of the Emerging Plan - the first ever WCWR regional plan. Our approach to regional planning has developed further in the Draft Regional Plan and our Final Regional Plan will reflect our growing and widening approach to water resource management across the region. In addition, steps have been taken to ensure the development of models for use in an improved Regional Plan 2 which we expect will be required for 2029.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
<b>OFWAT - Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	Our main challenge is that we want to see how the regional plan drives – and adds value to – the WRMPs.	West Country Water Resources (WCWR) Regional Plan has driven a closer working relationship between the three regional water companies. This has facilitated and confirmed the need for three in region Strategic Resource Options (SROs) and a more advanced strategic view of intra-regional sharing of water resources. The in-region SROs are not donor SRO schemes to other regions and within the planning horizon in this first plan to 2050 the requirement for imports of resource from other regions is negligible. The region through the regional plan and individual company plans has developed a stronger water resource resilience position for the longer term than at the commencement of the regional planning process.	No change proposed.
<b>OFWAT - Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	Where there are areas that aren't delivered this round we want to understand what the longer term plan is what the implications are and how they're going to be managed. We want to understand what decisions are to be taken on the basis of this analysis and which on future more sophisticated analysis and how this can give	West Country Water Resources (WCWR) recognises that the first regional plan is the first step towards a more integrated management of water resources in the region involving the water companies and other water using sectors. A next steps section featured in our Draft Regional Plan - this will be retained	Enhanced next step section and commitments in the Final Regional Plan.



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		confidence that decisions are informed by the right level of data and analysis.	and developed in the Final Regional Plan submission.	
<b>OFWAT - Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	Because the regional plan is not taking forward regional modelling, we will be expecting high quality WRMPs that explain how they add up to a regional picture	The need for a regional model is an important outcome that has emerged through the first regional plan, and West Country Water Resources (WCWR) have taken immediate actions to ensure that a model is developed to support regional planning in the future. A resilient WCWR region requires more significant inter-company transfers, and this is reflected in the company Water Resource Management Plans (WRMPs).	No change proposed.



Engagement and Collaboration

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Environment Agency- Emerging Plan	Engagement and collaboration	Better understanding of non-PWS water needs required including identifying potential sources of water	Following the completion of the Draft Regional Plan, West Country Water Resources (WCWR) looked to increase its work into the Focus Catchments. Selecting pilot locations to further explore non-public water use in these areas.	The non-public water use within the selected catchments will be highlighted and a road map to rolling this programme out across the region will be explained in the final Regional Plan.
OFWAT - Emerging Plan	Engagement and collaboration	More stakeholder engagement required.	West Country Water Resources (WCWR) is developing a stakeholder engagement strategy at region, catchment, and SRO levels to engage with local land and water users to better understand needs and concerns within each catchment.	Focus Catchment groups will be further progressed moving towards the submission of the Final Regional Plan and beyond.
OFWAT - Emerging Plan	Engagement and collaboration	Broad range of stakeholders to be approached.	Through the development of the draft regional plan and consultation process, together with the establishment of an engagement focus team, engagement with water users has expanded. This included NGOs, River Trusts, energy, mineral, agricultural and tourism groups.	Continued work on the Focus Catchments moving into the Final Regional Plan submission.



## Engagement and Collaboration

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT - Emerging Plan	Engagement and collaboration	Better understanding of Non-PWS water needs required.	West Country Water Resources (WCWR) intends to expand its understanding of Non-Public Water Supply (Non-PWS) abstractors throughout the South West over the coming years to ensure the second round of regional planning reflects true picture of the supply and demand balance on a catchment basis within the South West region. This work has commenced on the Dorset Stour catchment and will be reported in the Final Regional Plan.	Report on Non-Public Water Supply (Non-PWS) water needs will be included in the Final Regional Plan.
OFWAT - Emerging Plan	Engagement and collaboration	Need to engage with customers to better understand affordability.	The regional water companies are all engaging and discussing affordability at the time of the Price Review Process to determine customer charges for 2025-2030. West Country Water Resources (WCWR) will develop engagement as part of its stakeholder engagement strategy. However, evidence-based engagement will be more proactive when the investment model element of the within region water transfer modelling has been completed.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT - Emerging Plan	Engagement and collaboration	How will proposals for new agricultural sector engagement work and add benefit / value to the plan at this stage?	West Country Water Resources (WCWR) is supporting a national group which is engaging the agricultural sector together with the Environment Agency. When considering the water environment as a resource 'pool' from which many draw upon combined with the need to maintain the environment it is essential for the many sectors to equally understand these needs and demands. And in a holistic way for the regulator to be able to conduct its statutory duties. Through this understanding, conjunctive uses can be identified then partnerships formed to aid in overall water resource management (including both flood and drought).	Ensure an updated status of engagement, concerns and issues from the agricultural sector are reflected in the Final Regional Plan.



Engagement and Collaboration

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT - Emerging Plan	<b>Engagement and collaboration</b>	An update on people and resourcing and who is leading on which aspects	West Country Water Resources (WCWR) has taken an exciting step forward and gained approval to grow the group. We have taken on three extra people to date, with one more to follow. This growth will enable the team to work with a wider remit, targeting growing the footprint and influence of the WCWR. A critical area of focus is to ensure the messaging and campaigns on key areas, such as water usage, are led by this group.	No change proposed.
OFWAT - Emerging Plan	<b>Engagement and collaboration</b>	How will proposals for new agricultural sector engagement work and add benefit / value to the plan at this stage?	West Country Water Resources (WCWR) is supporting a national group which is engaging the agricultural sector together with the Environment Agency. When considering the water environment as a resource 'pool' from which many draw upon combined with the need to maintain the environment it is essential for the many sectors to equally understand these needs and demands. And in a holistic way for the regulator to be able to conduct its statutory duties. Through this understanding, conjunctive uses can be identified then partnerships formed to aid in overall water	Ensure an up to date status of engagement, concerns and issues from the agricultural sector are reflected in the final regional plan.





Engagement and Collaboration

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
			resource management (including both flood and drought).	



## Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Environment Agency- Emerging Plan	Environment	Provide preferred environmental destination against a baseline of existing regulatory commitments and better highlight where WCWR is proposing to go beyond the baseline and how it intends to prioritise this work.	West Country Water Resources have committed to meeting the Business As Usual Plus (BAU+) Environmental Destination scenario within the Final Regional Plan.	Include Environmental Destination Scenario Business As Usual Plus (BAU+) as a minimum in the Final Regional Plan.
Environment Agency- Emerging Plan	Environment	Although work has begun on the five focus catchments, WCWR must also consider and plan for all catchments not prioritised for current study. The Isles of Scilly should also be included in the plan	West Country Water Resources (WCWR) developed more detailed Environmental Destination plans within the Water Resources Management Plans. These headline figures were included within the Draft Regional Plan submission. The Focus Catchment reports were published alongside the Draft Regional Plan.	West Country Water Resources will present Environmental Destination plans within our Water Resource Management Plans and reflect these within the Final Regional Plan.
Environment Agency- Emerging Plan	Environment	Although work has begun on the five focus catchments, WCWR must also consider and plan for all catchments not prioritised for current study. The Isles of Scilly should also be included in the plan.	Thank you for your comment, it has been noted. Our work to date has been focussed on five catchments to consider in detail. Expansion of the Focus Catchments for the next iteration of the Regional Plan is being considered.	West Country Water Resources (WCWR) will include our plans for the future of the Focus Catchments in the Final Regional Plan.



Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
OFWAT - Emerging Plan	Environment	Environmental destination should be better defined.	West Country Water Resources have committed to meeting the Business As Usual Plus (BAU+) Environmental Destination scenario within the Final Regional Plan.	The Final Regional Plan will confirm the position of each of the water companies in the region and their agreed Environmental Destination reductions.
OFWAT - Emerging Plan	Environment	Further work is required to understand and prioritise abstraction changes.	West Country Water Resources (WCWR) together with the Environment Agency and Natural England continue to discuss abstraction reductions and delivery timings. Many reductions take time to plan and deliver to ensure that public water supplies remain robust.	No change proposed.
OFWAT - Emerging Plan	Environment	Further work is required to understand and prioritise abstraction changes.	We are developing more detailed Environmental Destination plans within our Water Resource Management Plans.	Present environmental destination plans from Water Resource Management Plans within the Final Regional Plan.
OFWAT - Emerging Plan	Environment	Develop multi-sector plan for catchments	Our multi-sector plans have focussed on the Focus Catchments.	No change proposed.
OFWAT - Emerging Plan	Environment	Are methods used for weather data generation and for water resources modelling proportionate in the context of the moderate risk planning challenge WCWR is facing	UK Climate Projections (UKCP18) have been used for both the Emerging and Draft Regional Plans and Water Resources Management Plans. We will enhance the climate	Improve the readability of the climate change text in the Final Regional Plan.



Environment

Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
		and are these approaches producing robust estimates of DO (both baseline and options) under 1 in 500 year drought resilience and climate change? Is stochastic weather data and UKCP18 being used?	change text in the Final Regional Plan when discussing the supply and demand balance.	
<b>OFWAT - Emerging Plan</b>	<b>Environment</b>	What are the final Environmental Destination scenarios?	The Environmental Destination scenarios selected for the Draft Regional Plan were the Business As Usual Plus (BAU+) and Enhanced reduction volumes.	No change proposed.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Environment Agency-Emerging Plan	Supply and Demand	Demonstrate how Demand management targets can be delivered.	Reflect non-household demand management options identified within our WRMPs in our Regional Plan.	Include further narrative to highlight the collaborative approach we will take on demand management & water efficiency at a regional level.
Environment Agency-Emerging Plan	Supply and Demand	Deficits seen in the Tables need further explanation - There is also no solution identified to resolve these deficits.	The Draft Regional Plan included further options to ensure that the most likely future scenarios contained sufficient options to cover any deficit of potential water supply shortfall.	The Final Regional Plan will draw together the updated list of options from all three water companies to provide the most up to date outlook of future scenarios across the region.
Environment Agency-Emerging Plan	Supply and Demand	Demonstrate how Demand management targets can be delivered.	Consistent assumptions on Water-labelling, building regulations changes, and pandemic impacts will be used within WRMPs, reflected within the Regional Plan, and explained in both.	Include further narrative to highlight the collaborative approach we will take on demand management & water efficiency at a regional level.
Environment Agency-Emerging Plan	Supply and Demand	Third party options to be considered	Forecasts of deficits in non-Public Water Supply (PWS) abstractors are hugely uncertain due to lack of available data. Ongoing work is looking at data sources and accuracies for non-PWS abstractions and this will aid in informing how to engage with future third party options.	West Country Water Resources (WCWR) will include a scenario to understand the potential impact of future non-Public Water Supply (PWS) deficits on our plans.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
<b>Environment Agency- Emerging Plan</b>	<b>Supply and Demand</b>	Insufficient options & screening criteria	West Country Water Resources (WCWR) have expanded options since the emerging plan and will develop screening criteria as part of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow. These developments will be shared with the Environment Agency.	No change proposed.
<b>Environment Agency- Emerging Plan</b>	<b>Supply and Demand</b>	Further strategic options and incorporate smaller supply options	The lack of deficit in previous company plans means that existing options were not well developed at Draft Regional Plan stage to meet requirements under all futures. Company plans will have developed further for the inclusion in the Final Regional Plan.	West Country Water Resources (WCWR) will include more detail regarding additional Strategic Resource Options (SROs) and smaller supply options.
<b>Environment Agency- Emerging Plan</b>	<b>Supply and Demand</b>	Demonstrate how Demand management targets can be delivered and requirement to be more innovative and collaborative and provide evidence SRO scheme (Poole effluent) impact if PCC reduced	West Country Water Resources (WCWR) have successfully engaged with the Strategic Resource Options (SRO) process and have identified significant new options such as Mendip quarries and Poole effluent recycling. However, switching our planning activity from that required for a supply-demand surplus to what is required to address a large deficit - this will take time.	West Country Water Resources (WCWR) to align the Final Regional Plan with the Water Resource Management Plans (WRMPs) to ensure it reflects an appropriate range of options considered within them.



Respondent	SoR Theme	Comment	Response	Changes to be implemented into Final Plan
Environment Agency- Emerging Plan	Supply and Demand	Demonstrate how Demand management targets can be delivered.	West Country Water Resources (WCWR) have engaged with retailers within the development of our Draft Regional Plan and Waterwise have commended us for this.	Further narrative to highlight the collaborative approach we will take on demand management & water efficiency at a regional level to be included in the Final Regional Plan.
Environment Agency- Emerging Plan	Supply and Demand	The lists of options, screening criteria, and results of screening should be shared with the EA	West Country Water Resources (WCWR) have expanded options since the emerging plan and will develop screening criteria as part of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow. These developments will be shared with the EA.	No change proposed.
OFWAT - Emerging Plan	Supply and Demand	Have demand scenarios been finalised? What are the final scenarios?	The Draft Regional Plan considers five future supply and demand scenarios.	No change proposed.
OFWAT - Emerging Plan	Supply and Demand	Has the options appraisal process now been described in detail within the regional plan? Does this demonstrate that a wide range of options have been considered and what's the plan for widening the range of options?	West Country Water Resources (WCWR) will develop a regional approach aligning Bristol Water, South West Water and Wessex Water to ensure a Best Value Plan (BVP) can be implemented. The start of this will be the development of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	No change proposed.



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<b>OFWAT - Emerging Plan</b>	<b>Supply and Demand</b>	Are there sufficient options to meet the upper need for water in 2050?	The number of options in company Water Resource Management Plans (WRMPs) have increased since the emerging plan, to provide head room on the estimated upper need. Further work will address as the WRMPs are finalised.	West Country Water Resources (WCWR) will look to improve clarity in the Final Regional Plan text.
<b>OFWAT - Emerging Plan</b>	<b>Supply and Demand</b>	Have company level options now been included?	West Country Water Resources (WCWR) produced a list of options and volumes generated by each company as a total within their Water Resource Management Plans (WRMPs) for the Draft Regional Plan submission.	West Country Water Resources (WCWR) will produce a further technical appendix for the Final Regional Plan submission.
<b>OFWAT - Emerging Plan</b>	<b>Supply and Demand</b>	What was the outcome of your review of the use of the 10 MI/d threshold?	WRMP options were included and summarised within the draft regional plan, and further options have been developed following the draft regional plan publication.	Further work to present the most current working group of options from the WRMP process will be undertaken for the final plan





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<b>OFWAT - Emerging Plan</b>	<b>Supply and Demand</b>	Will the regional plan address regulatory commitments on PCC and leakage?	The Final Regional Plan will address the regulatory commitments on leakage and per capital consumption (pcc). These commitments form the basis of the potential future scenarios presented for the region. We believe that our approach to this first Regional Plan, which is based on the Water Resource Management Plans (WRMPs) informing the Regional Plan is correct, as the Regional Plan is non statutory, and it is better for these regulatory commitments to be part of the individual company statutory WRMPs. The Government's Environmental Improvement Plan (EIP) was published at the same time as the Draft Regional Plan (31st January 2023). Our Final Regional Plan will reference and reflect the specifics presented in the EIP.	West Country Water Resources (WCWR) will include further updates to the position of leakage and demand management will be drawn through from the Water Resource Management Plans (WRMPs) into the Final Regional Plan publication.



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<b>OFWAT - Emerging Plan</b>	<b>Supply and Demand</b>	How are you going to give confidence that demand can be managed?	The programmes to deliver the regulatory commitments that form the area of demand reductions will be formulated as part of the Water Resource Management Plan (WRMP) process and presented in companies long term delivery strategies and PR24 business plan submissions for the period 2025-2030. These plans will be reviewed by both Ofwat and the Environment Agency for its robustness to achieve the desired outcome and the associated cost. The Draft Regional Plan potential future scenarios (section 5.2 page 19) outlines achieving demand reductions fully and only achieving 50% of the desired outcome. These scenarios give the region a 'best' case and 'not so good' case for regional water resource resilience planning.	Add an annual review seminar with all companies regarding delivery of planned interventions to reduce demand and also measurable achievements on reducing demand e.g. per capital consumption (pcc) flightpath to 110 litres per day (l/p/d).
<b>OFWAT - Emerging Plan</b>	<b>Supply and Demand</b>	Profiling: Which glidepaths are being explored, which policies they are relying on and assumed dates of implementation? Resilience, PCC, Leakage.	The Water Resource Management Plan (WRMP) glidepaths were adopted within the Draft Regional Plan to follow the same key dates of implementation for both per capital consumption (pcc) and leakage.	No change proposed.



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OFWAT - Emerging Plan	Supply and Demand	What is the extent and breadth of sensitivity testing planned? Adaptive planning – branch points based on uncertainty.	The West Country Water Resources (WCWR) regional model will as it is developed build and include sensitivity criteria.	No change proposed.
OFWAT - Emerging Plan	Supply and Demand	Insufficient options & lack of detail on them.	West Country Water Resources (WCWR) have expanded options since the emerging plan and will develop screening criteria as part of the Regional System Model (Phase1) with Phase 2 - the Investment Model to follow.	Expanded options will be included in the Final Regional Plan.
OFWAT - Emerging Plan	Supply and Demand	More options required to meet the deficit forecast under more challenging futures, including smaller options.	The lack of deficit in previous company plans means that existing options were not well developed at Emerging Regional Plan stage to meet requirements under all futures. Company plans will have developed further for the inclusion in the Final Regional Plan.	West Country Water Resources (WCWR) will include more detail regarding additional Strategic Resource Options (SROs) and smaller supply options.
OFWAT - Emerging Plan	Supply and Demand	Consideration of non-household demand management options.	West Country Water Resources (WCWR) have engaged with retailers within the development of our Draft Regional Plan and Waterwise have commended us for this.	Further narrative to highlight the collaborative approach we will take on demand management & water efficiency at a regional level to be included in the Final Regional Plan.



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<b>OFWAT - Emerging Plan</b>	<b>Supply and Demand</b>	The assumed impact of Government-led demand management options and the pandemic have not been explained.	The timing and impact of water labelling of products and changes to building regulations remains uncertain.	Further narrative to highlight the collaborative approach we will take on demand management & water efficiency at a regional level to be included in the Final Regional Plan.
<b>OFWAT - Emerging Plan</b>	<b>Supply and Demand</b>	Reflect non-household demand management options identified within our Water Resources Management Plans (WRMPs) in our Final Regional Plan.	West Country Water Resources (WCWR) have engaged with retailers within the development of our Draft Regional Plan and Waterwise have commended us for this.	Further narrative to highlight the collaborative approach we will take on demand management & water efficiency at a regional level to be included in the Final Regional Plan.
<b>Environment Agency- Emerging Plan</b>	<b>Best Value Plan (BVP) and decision making</b>	Regional Plan driving fully integrated WRMPs	It is not possible to provide a top-down plan for this round of planning. Developing the required level of integrated modelling in the given timescale is unrealistic. The Final Regional Plan will include a more robust assessment of regional needs which will be developed through the finalised Water Resource Management Plans (WRMPs) and input into the regional plans including more evidence of key infrastructure needs and the timing of their delivery.	Present an updated and more rigorous version of the strategic-level plan presented within the Emerging Plan for consultation.