

September 2023
Draft Regional Plan
Consultation
Statement of Response

Foreword

West Country Water Resources is pleased to publish this Statement of Response to stakeholders' comments on the first Draft Regional Plan for the West Country region, published in February 2023. Receiving comments from stakeholders who all have an interest in water supply across the West Country area is something we recognise as invaluable in producing a plan that has wide support.

The combination of comments is informative in terms of the big issues stakeholders see the region facing in the future and those that are of the highest concern. For this first Regional Plan, stakeholders have indicated that the big issues they wish us to consider and address are:

- making sure there is sufficient water for the environment and planning to provide the best value outcome;
- the region has a resilient supply and demand balance;
- strategic resource options are developed in a sensitive way; and
- that engagement continues with those who have an interest in our work.

Our response to all stakeholder comments is presented along with details of how we will be making changes to the Final Regional Plan. We are committed to future work and furthering engagement across the region as we plan programmes of work to inform the preparation of the second Regional Plan in another five years.

Our first Regional Plan will be published in late 2023.

Trevor Bishop

WCWR Independent Chair

David Harris

WCWR Board Director

Matt Greenfield

WCWR Board Director

Director of Drought and Resilience

South West Water

Director of Strategy and Regulation

Wessex Water



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1 Introduction

1.1 Draft Regional Plan

Our Draft Regional Plan sets out the long-term water needs for the West Country up to 2050 and explores:

- options to respond to the future of water resource management
- resilience of water supply
- benefits to the environment in the region

We know that strategic water resource planning will have an impact on a range of stakeholders who – while not always directly involved in water resource management – will have views on the role water will play in the future for local businesses, households, and the environment in our region.

West Country Water Resources (WCWR) has already carried out engagement with lots of stakeholders and statutory bodies, primarily on our Emerging Plan. The consultation described in this document continued that engagement with the aim of receiving the views of various sectors in the region to review our updated Draft Regional Plan and help inform the development of the Final Regional Plan.

The approach to this consultation was developed in collaboration with external partners and the views received will help inform the development of the region's first Regional Plan, which is due to be published in December 2023. Further iterations of the plan will then be published every 5 years.

This report provides:

- An overview of WCWR and the national water resource planning context.
- Summary of the engagement activities undertaken which underpins this consultation programme, including the consultation materials produced.
- An overview of the key themes and questions raised during the consultation and how we have considered these.
- Details of the anticipated next steps in support of the development of the Final Regional Plan and a plan for further and continuing engagement.

Appendix B is a detailed breakdown of all of the responses we received and our reply to these comments.

1.2 Water resource management planning context

In March 2020, the Environment Agency published the [National Framework for Water Resources](#)¹ This marked a move to strategic regional planning and the identification of five regional groups of water companies to support and lead the strategic long-term water needs in their respective regions. These regional groups plan collaboratively under the framework to make the long-term investments in water resources represent the best value for people, the environment and the economy across the country.

While dominated by water supply planning there was also a developing and growing need for all water using sectors who depend on a secure supply of water to be involved, while also ensuring the environment is protected and improved.

Each regional group has been asked to produce a single plan that:

- Enhances water supply resilience
- Considers a range of uncertainties and future scenarios
- Develops a Best Value Plan for the region

Water Resource Management Plans

Alongside the Regional Plan, each water company is developing a Water Resource Management Plan (WRMP), setting out plans to achieve secure water supplies as well as protecting and enhancing the environment. This first Regional Plan will provide a framework for greater cross-company engagement which will help improve the development of future iterations every 5 years.



¹ National Water Resources Framework: <https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources>

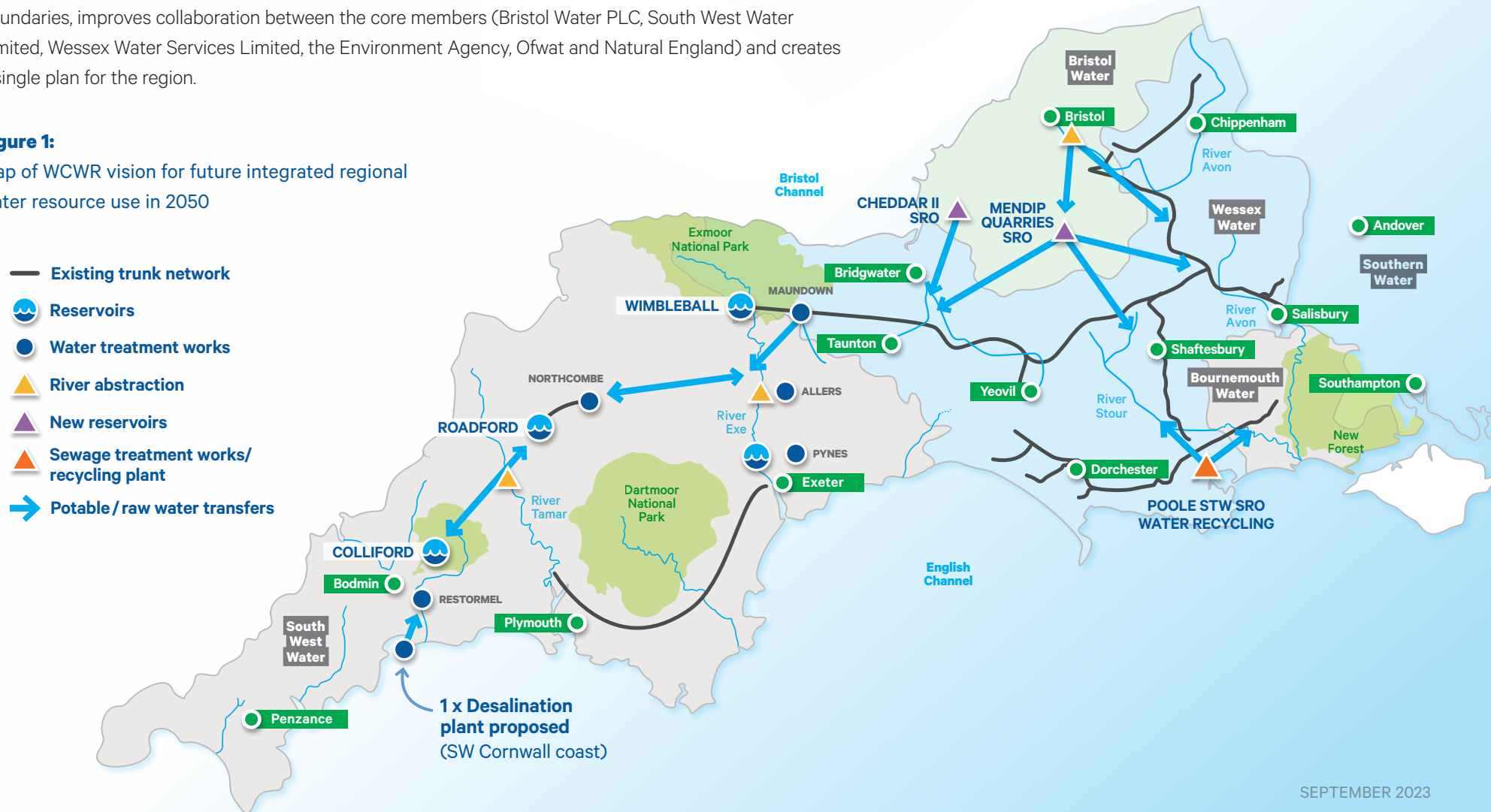
1.3 West Country Water Resources

West Country Water Resources (WCWR) was created in 2018 with the purpose of developing the first ever water resource plan to protect water security across the West Country region of England.

We are supporting a coordinated approach to water resources planning that goes beyond water company boundaries, improves collaboration between the core members (Bristol Water PLC, South West Water Limited, Wessex Water Services Limited, the Environment Agency, Ofwat and Natural England) and creates a single plan for the region.



Figure 1:
Map of WCWR vision for future integrated regional water resource use in 2050



1.3 West Country Water Resources

Continued

The Regional Plan

Work on the Regional Plan started in 2018 with the formation of WCWR, with the purpose of creating the first ever regional water resources plan for the West Country, setting out the long-term water needs for the region up to 2050 and exploring the options to respond to those needs.

In January 2022, WCWR published and sought feedback on its Emerging Plan, this was used as the basis for updates and development of the Draft Regional Plan. Responses to comments on the Emerging Plan are available in Appendix C.

The Draft Regional Plan:

- Signals early sight of the most urgent water issues which the region faces up to 2050 based upon a range of potential future scenarios. This includes:
 - + Future needs and pressures to understand the likely supply and demand gap
 - + Pressures on water resources, such as climate change and environmental sustainability

- Identifies both options to help reduce the demand for water and increase future supplies.
- Presents solutions, including strategic water resource solutions included in the RAPID programme (Regulators' Alliance for Progressing Infrastructure Development)² to generate feedback from stakeholders.
- Reports on outputs from an inter-regional reconciliation process where water sharing between regions has been analysed (Appendix A).
- Provides a public document that West Country Water Resources (WCWR) sought views on.
- Is a further step in an ongoing process of regional water resource plan development.

You can find all of the previous documents at <https://www.wcwr.org/our-work/documents/reports>

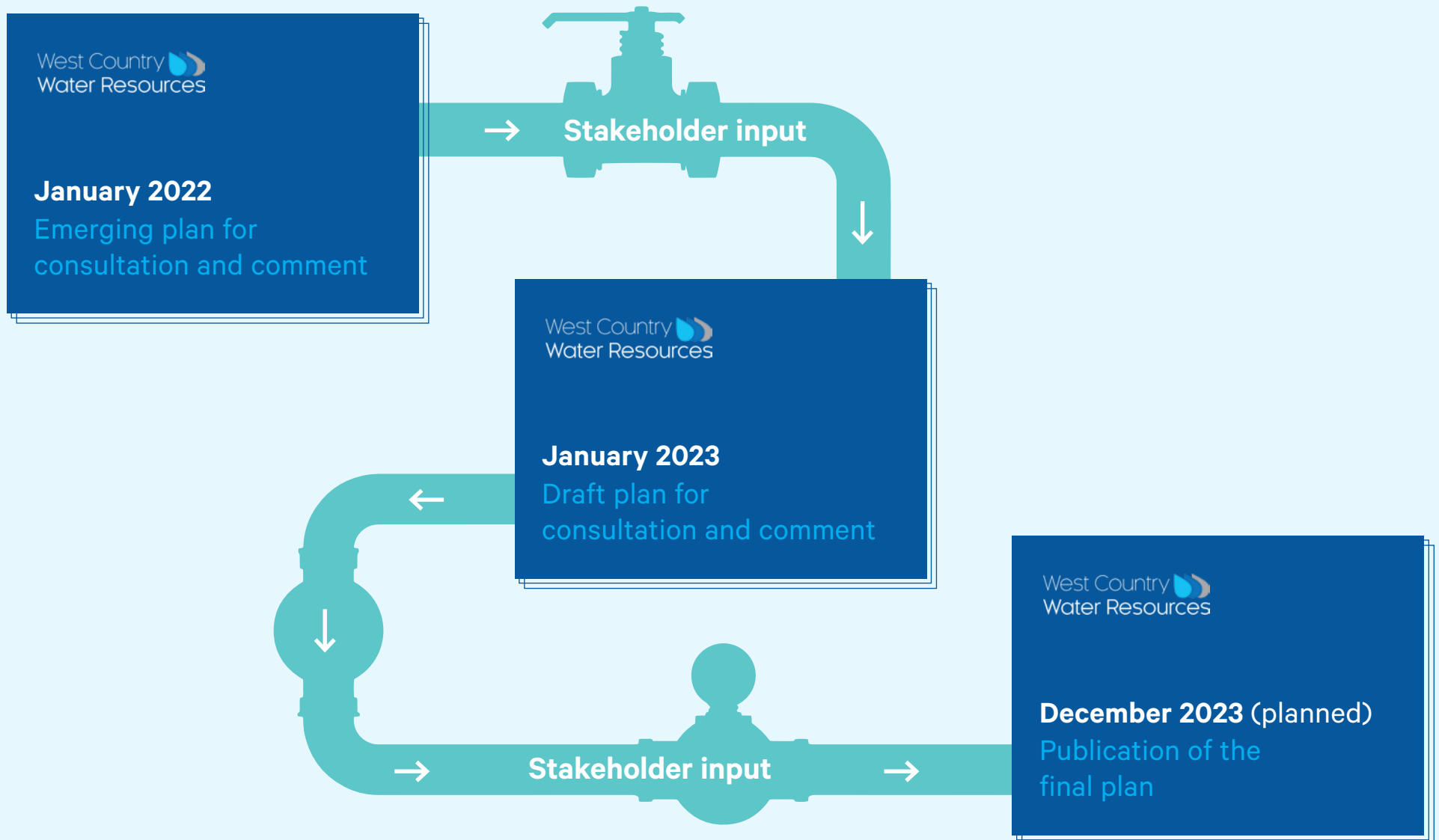
The Draft Regional Plan is not a reaction to the drought conditions experienced in 2022, though lessons learnt from the 2022 summer drought will be incorporated into the revised Final Regional Plan, alongside feedback received on the Draft Regional Plan and ongoing engagement with stakeholders. It has also considered any changes in policy or guidance published following the Emerging Plan. The Final Regional Plan will also address any additional changes since the publication of the Draft Regional Plan in January 2023.

More information on the previous consultation can be found in the **Draft Regional Plan – Full Technical Plan, Section 9: Conclusions and next steps.**³

² [RAPID Forward Programme - Ofwat](#)

³ <https://www.wcwr.org/siteassets/document-repository/reports/draft-west-country-water-resources-plan-31jan2023.pdf>

Figure 2. Journey of the regional plan



2 Our approach to engagement

2.1 Principles and aims

The aim of the consultation was to gather feedback and provide stakeholders with an opportunity to discuss the plan, ensuring the views of stakeholders inform work on the Final Regional Plan.

While people taking part in the consultation were welcome to give us comments on any topics, we also outlined areas where feedback would be particularly helpful:

- If the content of the Draft Regional Plan was clear
- The conclusions of the Draft Regional Plan
- If there was anything missing from the Draft Regional Plan
- Proposed Strategic Resource Options for the West Country
- The balance of demand reduction versus new resource options in the Draft Regional Plan
- The approach to demand reduction
- The approach to the environment

Reflecting this, an approach to external engagement was developed that was proportionate and targeted. We wanted to hear the views of those who have a professional or regulatory interest in water resource plans, the environmental sectors, as well as those who represent businesses, interest groups and customers and communities.

Section 2.2 outlines the approach and delivery of the consultation to enable engagement from a range of participants.

2.2 Approach to consultation

The consultation on our Draft Regional Plan ran from 1 February to 26 April 2023. Throughout this 12-week period local authorities, statutory bodies, businesses, interest groups, members of the public and a range of other organisations attended our online event, asked questions, and responded to the request for feedback on the Draft Regional Plan.

How we delivered the consultation

To make the consultation accessible to a range of participants, a non-technical summary of the Draft Regional Plan was produced to provide an easy-to-understand overview of the plan. This supported the full technical plan document and was available on the WCWR website. Interactive engagement via a webinar was also undertaken, to give people an opportunity to ask questions about the plan.

Consultees were able to provide feedback in a variety of ways.

The consultation used digital technology to engage a variety of participants via:

- WCWR website: <https://www.wcwr.org/our-work/draft-regional-plan>.
- Online webinar
- Producing a non-technical summary of the full Draft Regional Plan
- Providing multiple channels to provide feedback via the website, email and a Microsoft Forms questionnaire

2.2 Approach to consultation

Continued

Who we consulted

WCWR and the individual water companies had already carried out engagement with several interested stakeholders at earlier stages. We also carried out further work to identify those who might be interested in the Draft Regional Plan.

The consultation was open to anyone with an interest in the Draft Regional Plan, with a particular focus on:

- Those who previously engaged in earlier consultations on the Draft Regional Plan
- Those with responsibility or interest in water or infrastructure planning in West Country
- Statutory bodies or other professional organisations in the region
- Interest groups covering tourism, agriculture, minerals, education and the environment
- Members of the public and existing water customers

To identify potentially interested stakeholders, we used: previous WCWR and core member consultations; prescribed bodies under relevant planning regimes; and desk research to identify publicly available stakeholder lists. In total WCWR contacted 450 stakeholders from 14 different sectors at the beginning of the consultation.

Consultation materials

At the start of the consultation, we published:

- A non-technical summary of the technical report
- A detailed technical report
- Feedback form

All documents were available to view or download on WCWR's website.

Building awareness of the consultation

People were encouraged to participate in the consultation through activities designed to raise awareness of the engagement opportunities. Direct contact was made at the launch of the consultation and information was also put on the WCWR website.

WCWR Website

At the start of the consultation a page was added to the WCWR website to provide information on the consultation, including:

- An introduction to the consultation.
- Viewable and downloadable copies of the consultation document and supporting materials.
- Details of public webinar event – with details on how to join a session.
- A downloadable feedback form, an online MS Forms feedback form, a document upload option on the website and email details.

2.2 Approach to consultation

Continued

- The closing date for the consultation.
- The email address that people could use to contact our team with any questions.

Email

Those on our stakeholder list were contacted by email on 22 February 2023 and provided:

- Details of the consultation.
- Links to the website and documents published to support the consultation.
- Details for the online webinar; and
- How to provide feedback them to a take part in the consultation.

Follow up emails were also issued to stakeholders during the consultation period.

Webinar

We held a public webinar, via Microsoft Teams, on 21 March 2023 between 10.30am-12pm. A copy of the presentation provided at the webinar is included as Appendix D and it covered:

- Introduction to WCWR
 - + Who are we and what are our goals?
 - + What are we trying to achieve and why?
- What is 'Water Resources Management'?

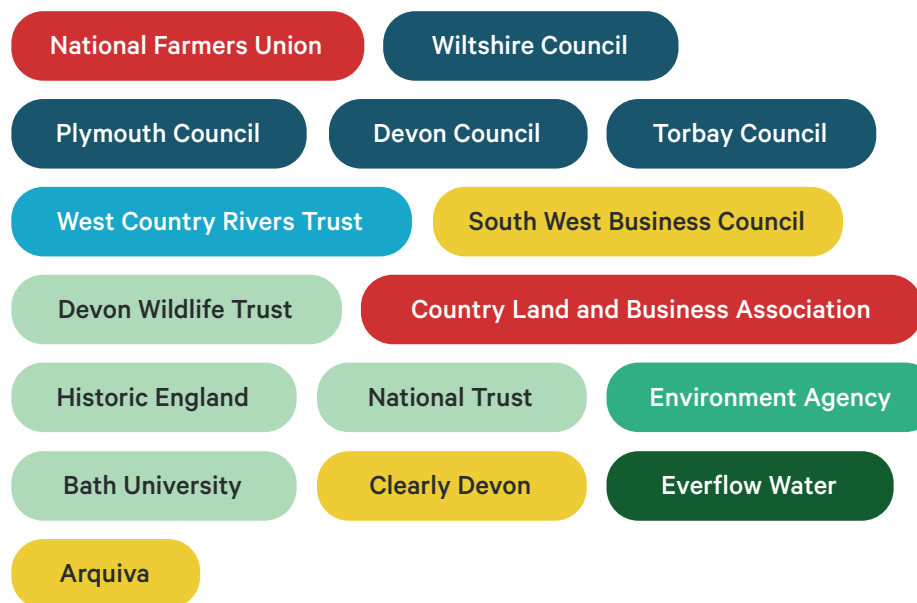
- The Draft Regional Plan
- Water Resource Management challenges
- Possible solutions
- How stakeholders can be involved and influence the plan

The project team responded to questions during the webinar, a copy of the questions that were asked and our answers can be found in Appendix E. In the webinar attendees were encouraged to provide formal feedback on the Draft Regional Plan.

In total, 33 people attended the webinar this included attendees from 16 organisations (see Table 1).

Table 1. Organisations that attended the Draft Regional Plan webinar event.

Online Webinar - 21 March 2023 10:30-12:00



2.2 Approach to consultation

Continued

Additional targeted meetings

A further 10 online or in-person 1-2-1 interactive meetings were held to facilitate further discussion on the regional plan.

How people could provide feedback

- A variety of channels were provided for responses to the consultation. These included:
- Online feedback form – MS Forms
- Document upload, via the WCWR website
- Downloadable feedback form
- Email

Wimbleball Lake

A joint Wessex Water and South West Water water resource serving the population of Somerset, Devon and Cornwall and supporting flows in the River Haddeo.



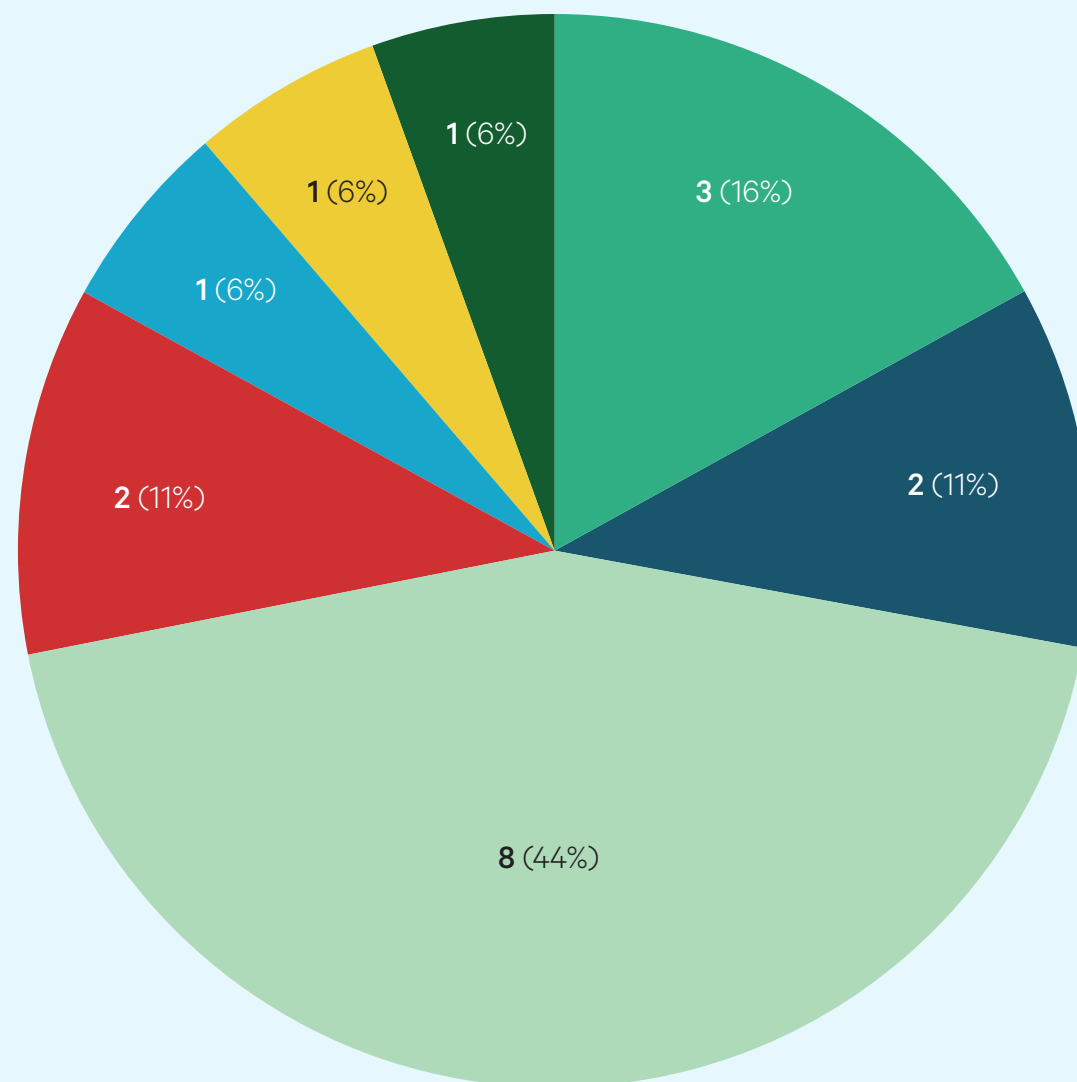
3 What you told us

3.1 Overview of your feedback

In total, 18 consultation responses were received during the consultation period. The majority of these responses went into significant detail and provided valuable technical guidance on the content of the Draft Regional Plan, with most responses from statutory environmental bodies or those with a direct interest in water resource management.

Figure 3 provides a breakdown of the sectors responses were received from, and Figure 4 provides a breakdown of how feedback was received.

Figure 3.
Stakeholder category of responses received

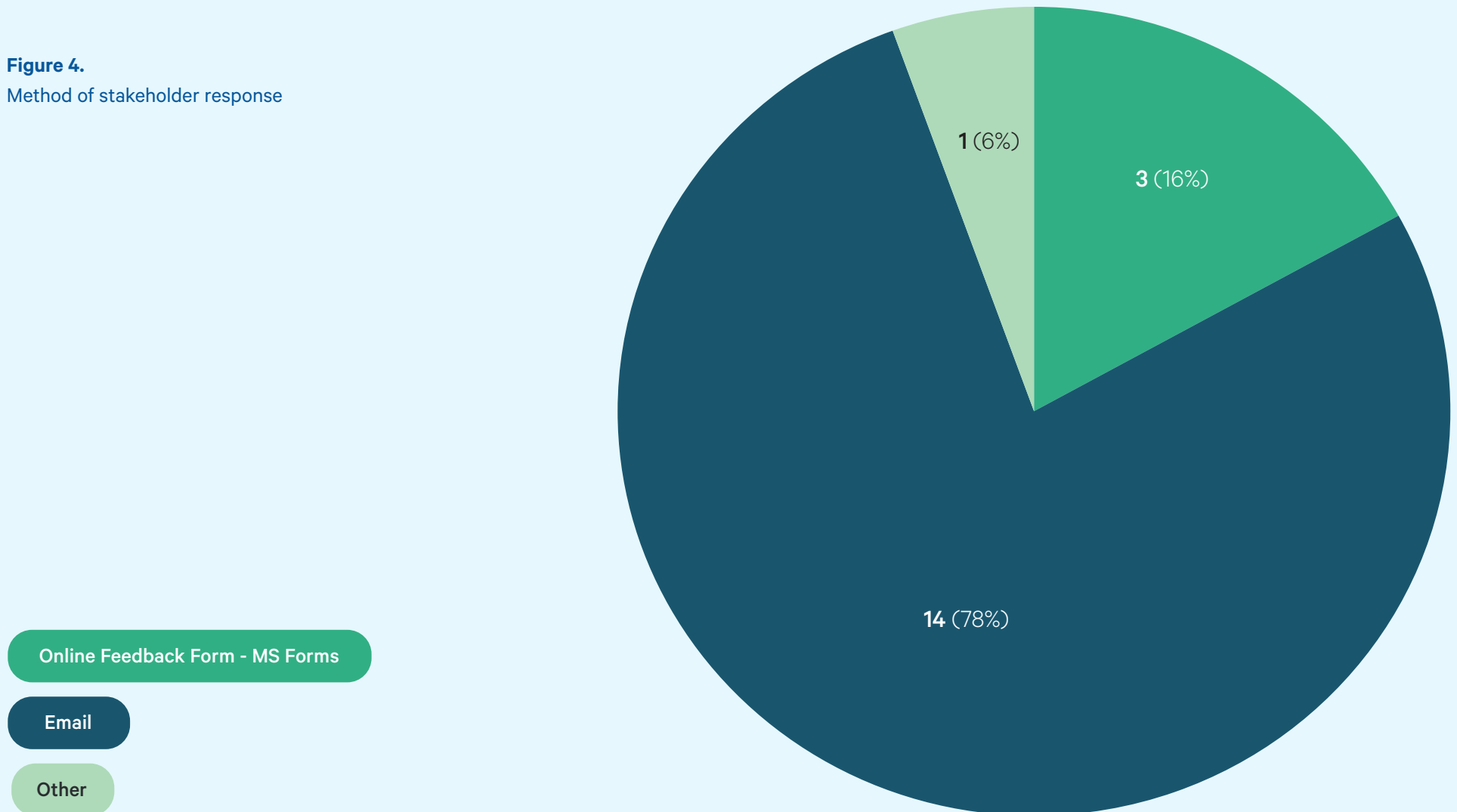


- Statutory
- Local Authority
- NGO
- Agriculture / Landowner
- Catchment Partnership
- Other Business Association
- Member of the public

3.1 Overview of your feedback

Continued

Figure 4.
Method of stakeholder response



3.2 Your feedback at a glance

We received a large number of individual comments spanning a wide range of topics. We have grouped the comments we received in to six key themes, with additional subthemes to cover specific topics discussed.

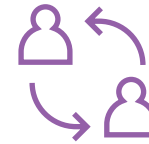


What is a best value plan?

A best value plan is one that considers factors alongside economic cost and seeks to achieve an outcome that increases the overall benefit to customers, the wider environment and overall society.

Best Value Planning and Decision Making

- Approach to best value planning
- Cost benefit analysis
- Additional focus on decision making and prioritisation.
- Low regrets investment



31 comments mentioned collaboration and multi-sector approaches.

Engagement and Collaboration

- Continue extensive engagement
- Ensure feedback is actioned or responded to
- Coordinated messaging at a regional level
- A final plan that is easy to engage with for all stakeholders



Of the feedback WCWR received the environment was mentioned in 130 comments.

Environment

- Level of ambition
- Pace or speed of delivery
- Nature based solutions
- Biodiversity Net Gain
- Historic Environment
- Water abstraction

3.2 Your feedback at a glance

Continued



Supply and Demand

- Early implementation of demand management measures (water efficiency)
- Approach to meeting demand reductions
- Water main leakage reduction



What are SROs?

Options that could provide a large volume of water for more than one water company to use, for example, new reservoirs, bulk water transfers and wastewater treatment and reuse schemes.

Strategic Resource Options (SROs)

- Scoping of additional supply side options
- Increase water storage across all areas of the region
- Risk if SRO's are not delivered to planned timescales
- Careful consideration of impacts of SRO's



Other Areas of Focus For Final Plan

- Final plan needs to be consistent with relevant water company WRMP's
- Supporting data needs to be accurate
- The final plan must be a single adaptive plan
- Review timescales of option implementation

3.2.1 A summary of your feedback and what we are doing to address it

We have reviewed all of the feedback that we received during the consultation and your comments are helping us to make changes to the Final Regional Plan, and how we engage in the future. This section provides a summary of comments we received and our response to them. Appendix B includes a full breakdown of the comments received and our more detailed response.

Table 2. Summary of comments received and WCWR's response



Best Value Planning and Decision Making

Feedback Summary

General Comments

Best Value Planning involves considering more than just economic cost, and should consider how a solution provides benefit to customers, society and the environment, but also remains affordable and efficient to deliver. Best Value Planning was frequently mentioned by stakeholders.

Several comments addressed the scope of Best Value Planning and felt that the approach to Best Value Planning should take a broad approach when considering long-term environmental, societal and economic benefits. It was requested that carbon emissions be included in the final Best Value Plan alongside a clear discussion of the trade-offs between whole life carbon emissions and other considerations.

The inclusion of 'intergenerational equity' as a best value metric was welcomed by one stakeholder, who called for consideration of the impacts on wider social wellbeing and more detail on how WCWR will understand impacts of decisions, including long-term impacts on the diverse local community.

How WCWR will address this in our Final Regional Plan

WCWR recognises that without a regional EBSD (Economics of Balancing Supply and Demand) model that the value its Regional Plan provides is constrained.

WCWR was formed in 2018 and the regional planning process has highlighted this modelling weakness. In response WCWR and the regional water companies have approved funding and committed to building a regional model and commissioning this work is underway.

Developing accurate and detailed water supply and investment models is large task and time consuming and was not achievable in the timescale for this first regional plan.

The first step in this new modelling work will be the development of a Regional System Model (Phase 1) with Phase 2 - the Investment Model to follow. WCWR are taking the steps necessary to ensure a best value plan can be implemented and is ready for the second regional plan.

**Best Value Planning and Decision Making****Feedback Summary****How WCWR will address this in our Final Regional Plan****Low Regrets Investment**

There was some support for WCWR's initial approach to planning 'low regrets' investment. However, concerns were raised about the scale of timing and the definition of low regrets. It was suggested that WCWR should plan with confidence to meet its least challenging environmental destination scenario. It was requested that WCWR provides evidence to demonstrate that the preferred programme represents low regrets best value investment over the long term.

WCWR supports fully the concept of planning for 'low regrets' investments. However, while that remains WCWR's commitment this will not be achievable until the modelling outlined above is completed. The Draft Regional Plan highlights the limited water supply options available and the risks associated with not achieving demand reductions. Further information will be provided that will outline recent work undertaken to provide confidence in demand reduction activities and the expansion of future water supply options.

Costs

Stakeholders asked that WCWR explains in its Final Regional Plan why high-cost options have been selected in place of lower cost feasible options. It was also suggested that WCWR carries out supply chain engagement to help reduce the risk against cost estimates being inaccurate and to increase the quality of this information in the Final Regional Plan. Further stakeholder comments outlined that good value in the long term requires investment now, giving examples of leakage fixing, use of new technologies, modern equipment, and nature-based solutions.

Unfortunately, balancing the constraints of a peninsular region with a sensitive environment and the need to transfer water from east to west are all factors that are affecting costs of solutions. Selection of options is also limited by the number of supply options available for this plan to meet the projected demands under the range of scenarios that are presented. Additional work will be undertaken on the expanded list of options for the next Regional Plan to support a robust cost analysis. WCWR and the constituent water companies are all currently examining a range of methods and technologies associated with leakage and demand reduction, and the use of more nature based solutions in Asset Management Period 8 (AMP8). AMP8 is the five-year investment period for water companies starting in 2025.

**Best Value Planning and Decision Making****Feedback Summary****How WCWR will address this in our Final Regional Plan****Decision Making**

OFWAT suggested that WCWR's work on decision making and prioritisation needs additional focus before the Final Regional Plan. It stated that WCWR should present the outcome of its problem characterisation to justify its choice of decision-making approach. Using an alternative model that includes a cost benefit analysis of options as a minimum was also suggested.

It was also noted that WCWR is developing a regional level decision making model for use in its next regional plan. This was considered a positive step, but it was requested that the regional group better demonstrates how regional level decision making has influenced the outcomes selected in its Final Regional Plan.

Decision making for this first regional water resource plan period will be undertaken individually by the three constituent water companies, as they develop, and delivery outcomes identified in Water Resource Management Plans 2019 and draft Water Resource Management Plans 2024. Decision making by WCWR will be undertaken on completion and use of the regional models outlined above. Currently decision making regarding supply options is limited by the number of options available to meet the projected demands under the range of scenarios that are presented in the Draft Regional Plan.



Engagement and Collaboration

Feedback Summary

General Comments

It was clear from feedback that stakeholders would welcome further collaboration on the Regional Plan and water management more generally. Lots of suggestions were provided for additional engagement and there was a broad desire from stakeholders to see further engagement with a range of audiences. This included local communities, catchment partnerships and NGOs.

In particular, respondents suggested further engagement with the agriculture sector, including developing mechanisms to enable farmers to be involved with the development of any solution. It was also considered important for the sector to understand more about how demand reduction, particularly with regards to business water consumption, could affect farmers and landowners.

While recognising WCWR's efforts to engage and collaborate, the responses encouraged further work on this approach. This is especially important within Catchment Partnerships, which are referenced as a major vehicle to deliver whole water system management in the government's Plan for Water.

There was also support for a more robust multisector approach, including gathering appropriate data and information on other water users to help inform the regional plan.

How WCWR will address this in our Final Regional Plan

WCWR recognises the importance of engagement with all stakeholders in the development of the regional plan. WCWR currently has ongoing dialogue with a range of stakeholders across multiple sectors and is currently in the process of planning for further engagement with the following sectors:



Agri Foods Industry



Minerals Industry



Catchment partnerships



Tourism

Following the publication of the Final Regional Plan in 2023, we plan to carry out further engagement to increase awareness of the WCWR's work and build on engagement through our existing relationships with stakeholders.

We welcome contact from stakeholders who wish to have further engagement with WCWR and to contact the team or arrange a meeting please email: contact@wcwrg.org



Engagement and Collaboration

Feedback Summary

Messaging Campaigns

The potential for WCWR to help coordinate messaging to the public and other stakeholders was highlighted. It was suggested that this could tie into national campaigns for public information regarding hose pipe bans. One stakeholder suggested a need for a strategic communications campaign to address public perception that water should be a freely available resource and to engage the public with water management processes and challenges.

Future Engagement Plans

OFWAT called for further detail in the customer and stakeholder feedback summary in the Final Regional Plan so that it better describes how WCWR will be working to make progress on the priorities identified. One stakeholder highlighted forums such as the Fisheries and Riparian Interests Working Group currently being established in the South West Water area as an example of methods that can encourage participation between the regional group and local groups.

How WCWR will address this in our Final Regional Plan

Following the publication of the Final Regional Plan in 2023, we plan to carry out further engagement to increase awareness of the WCWR's work and build on engagement through our existing relationships with stakeholders. This will include exploring opportunities to share and coordinate messaging with our partners. We will also support wider or national campaigns focused on regional water resource management.

This Statement of Response document, along with Appendix B, provides information about how WCWR is taking the feedback provided by stakeholders into account and outlines any resulting revisions to the Final Regional Plan. We are currently working on collaborating with local groups and partnerships and a variety of sectors to facilitate information transfer and cross-sector development of the Final Regional Plan, this work includes refining our stakeholder engagement strategy document to optimise our engagement with stakeholders and ensure we recognise feedback relating to engagement and collaboration.

We aim to deliver further stakeholder engagement at the catchment level, reaching out to local land and water users to better understand the needs within the catchment and will act as a roadmap to focus catchment rollout across the region.

**Engagement and Collaboration****Feedback Summary****Barriers to engagement with consultation and draft regional plan document**

Further comments suggested that the delay in the publication of data tables may have made it harder for stakeholders to fully engage with the consultation on the Draft Regional Plan. It was recommended that WCWR help its stakeholders understand the reasons and impact of the discrepancies in a revised Draft Regional Plan and/or in a statement of response it may be producing for its Regional Plan. Other comments suggested that the Draft Regional Plan could better represent the work undertaken and the information the region has available.

How WCWR will address this in our Final Regional Plan

WCWR is committed to producing a consistent and high-quality final document which allows all stakeholders to fully engage with the plan. We will review the plan ahead of publication and produce a document, which highlights key points from the regional planning process for a wide audience.

The final submission documents will be designed and a non-technical summary of the Final Regional Plan will be available.

**Environmental Destination****Feedback Summary****General comments**

There was a wide interest in the environmental considerations outlined in the Draft Regional Plan and it is clear this was a focus for many respondents. There was support for ensuring that any solutions leave the environment better than it was found and the importance of Biodiversity Net Gain was highlighted. In particular, this was noted in reference to SROs, with a view that any environmental impact from these should be mitigated.

Some respondents suggested that environmental targets and nature-based solutions should be more ambitious, as well as delivered more quickly.

How WCWR will address this in our Final Regional Plan

WCWR recognises that the environment is a key factor for many of our stakeholders. We work with all stakeholders to balance the needs of society and the environment when managing operational water assets.

As a result of feedback received, we will be updating the environmental destination elements of the Final Regional Plan in both the main report and technical appendix.

We are committed to improving the environment by implementing our environmental destination programme. Following the completion of the Draft Regional Plan, we have looked to increase our work into the focus catchments and we are supportive of expanding the Focus Catchment approach across the region. In order to ensure that the catchment reports are accessible to a variety of stakeholders, WCWR will include summary reports of catchment work with the final plan submission.



Environment

Feedback Summary

How WCWR will address this in our Final Regional Plan

Partnerships and Collaboration

Responses suggested multiple opportunities for collaboration to promote environmental improvements, stakeholders urged WCWR to fully explore partnerships to facilitate environmental improvements. It was suggested that these types of partnerships could promote nature-based solutions to as way to protect water resources.

WCWR welcomes the opportunity to continue and expand collaboration with stakeholders across the region on finalising the Regional Plan. WCWR sees these partnerships not solely focussed in the use of nature based solutions to protect water resources but in the wider remit of water management across flood risk reduction, water quality but also environmental and biodiversity improvement.

Nature Based Solutions

Many comments referred to nature-based solutions. Overall stakeholders felt that nature-based solutions could have greater focus in the Final Regional Plan and it was also noted that there is a need to build evidence bases for these solutions so they can be more easily deployed in the futures. Comments also suggested the plan should more explicitly discuss the multiple benefits of nature-based solutions which cover a wide scope.

The inclusion of nature-based solutions has been explored as part of WCWR's Focus Catchments work across the region. In response to feedback, we will also look to include details on sustainable drainage systems and include references to the recently published drainage and wastewater management plans by the water companies within the region.

**Environment****Feedback Summary****How WCWR will address this in our Final Regional Plan****Historic Environment**

Responses suggested the Final Regional Plan should give greater focus to the historic environment and explain why the historic environment is important in the context of water resource planning and management. Responses also highlight a number of specific historic sites which may be sensitive to changes to the water environment, alongside other sites which may offer opportunities for improvement projects.

In response to the feedback received, we will look to include an outline of how the historic environment will be addressed by regional water planning in the Final Regional Plan publication and will also include the statement 'impacts on heritage assets and their settings' suggested by Historic England to the table.

**Environment****Feedback Summary****Water Abstraction**

It was noted that changes to abstraction under the ‘environmental destination scenarios’ in the water resources national framework meant the scale of water needs has grown significantly from previous planning rounds. WCWR was asked to consider how its Final Regional Plan addresses the full range of potential abstraction changes without unnecessarily bringing forward investment that may not be needed.

It was also suggested that any planned investigations should be carefully scoped, to better understand the links between abstraction and the environment locally (for example, surface water and ground water interactions) and the type of option that may be most beneficial in that context.

It was also suggested that solutions considered by WCWR should include reduction in overall abstraction, changes in how abstractions operate or different locations for abstractions/ discharges.

How WCWR will address this in our Final Regional Plan

WCWR understands the level of potential change across the region in terms of abstraction volume losses (driven primarily by climate change and environmental destination abstraction reductions).

We are committed to fulfilling the environmental destination and sustainability reductions agreed with the Environment Agency. Investigations will be undertaken to confirm the reductions in abstraction agreed as part of the Environmental Destinations initiative. Those investigations will determine whether the values proposed are too high or not sufficient to meet the desired outcome and will form part of individual water company business plan proposals to Ofwat for funding.



Feedback Summary

General Comments

Responses displayed a general agreement from respondents that significant demand reductions are required, and comments called for a more ambitious approach to demand side reduction as well as calls for the scoping of additional supply side options.

It was also suggested that WCWR should demonstrate adaptability should demand reductions not be met, as it is almost wholly reliant on demand reductions to maintain public water supplies in the first half of the planning timescales.

Multiple stakeholders voiced agreement with the approach to implement demand management measures in the earlier stages of the plan.

Several responses asked for more detail on the planned scale of roll out for demand management measures across water companies, suggesting that table 12 in the main report (page 47) could be reviewed to be made clearer.

Suggestions were received about other areas to consider, such as engagement with the energy sector and hybrid/decentralised approaches, such as smaller local solutions for agriculture / businesses. Several comments also called more generally for increased consideration of nature-based solutions in the regional plan and the recognition of environmental improvement that this type of solution could deliver.

How WCWR will address this in our Final Regional Plan

WCWR recognises that leakage is an important issue for many of its stakeholders and the group is committed to meeting both the leakage reduction targets and the reduction in personal water consumption across the region.

We will continue work to understand how demand management strategies can be improved and advanced within the region and in response to feedback received the group will include greater detail on the demand management options outlined within the Final Regional Plan.

We will implement an adaptive planning approach with proposed trigger points for changes to the plan, trigger points will depend on the success of demand management measures.



Feedback Summary

How WCWR will address this in our Final Regional Plan

Leakage

Responses generally displayed a desire for ambitious leakage reduction target with some stakeholders saying they would welcome even high leakage reduction targets. Stakeholders noted that despite aims to halve leakage by 2050 from a 2018 baseline more information on how this could be achieved is needed. A further stakeholder suggested that the Draft Regional Plan does not align with the water industries commitment to meet the 50% leakage reduction target.

One stakeholder felt there was potential to include more emphasis on the responsibility of water companies to deliver the 50% leakage reduction target withing the regional plan. The consultation responses also display a feeling that investment in infrastructure now to reduce leakage would hold benefits in the longer term.

WCWR is committed to implementing its leakage and demand reduction incentives. We have committed to reducing leakage to 50 per cent of the 2017/2018 base level, reducing the total demand on the daily water supplied across the region alongside constructing new infrastructure to meet future pressures. In response to feedback, the Final Regional Plan will outline the road map to implementing these goals.



Feedback Summary

How WCWR will address this in our Final Regional Plan

Non-Public Water Supply (PWS)

Stakeholders asked for WCWR to carry out more research on non-Public Water Supply (PWS), with one respondent suggesting that the Draft Regional Plan is unable to identify or resolve any potential future supply shortfalls for non-PWS water users. One response recommended that WCWR should urgently conduct detailed modelling of future agricultural water needs and deficits at a catchment scale.

WCWR have commissioned and carried out a piece of research on non-PWS requirements which has demonstrated that forecasts of deficits in non-PWS abstractors are hugely uncertain due to lack of available data.

As part of the Focus Catchments scheme we are attempting to quantify understand the non-PWS abstractions needed across the region. This scheme will be further expanded across the region once the pilot programs are complete. We are committed to continued development of the focus catchments to help add to knowledge regarding non-PWS demands.


Supply and Demand
Feedback Summary**Demand Management**

A statutory consultee felt that the Draft Regional Plan does not fully demonstrate how it will achieve demand reductions. The stakeholder expects WCWR to set out a coherent and evidence-based approach to reducing water consumption which should clearly include its own actions to deliver water efficiency, whilst considering the latest government water efficiency policy announcements in the Final Regional Plan for Water.

There were several suggestions for regional demand management programmes including a suggestion to run local campaigns with stakeholders such as community river groups to reduce usage and normalise water reuse, changing public perception. It was suggested that this could be facilitated by expanding broader community schemes and working with existing stakeholder projects to promote quality data which could be shared.

How WCWR will address this in our Final Regional Plan

WCWR recognises the extent of the challenge faced by the region over the next 25 years, the ambition of its demand reduction targets and the investment required to achieve these.

The programmes to deliver the regulatory commitments around demand reductions will be developed as part of the Water Resource Management Plan (WRMP) process and presented in water companies long term delivery strategies and PR24 business plan submissions (Price Review process conducted by Ofwat for the period 2025-2030).

These plans will be reviewed by both Ofwat and the Environment Agency for robustness to achieve the desired reductions and to assess 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.

In response to feedback, we propose a bi-annual review seminars with all companies regarding delivery of planned interventions to reduce demand and also measurable achievements on reducing demand.

The Final Regional Plan will aim to address the concerns regarding the water saving options and the leakage solutions that have been included from the three water companies to meet the demand reduction targets. In response to comments, we will produce an appendix for the demand side and water efficiency options to provide further clarity on the options included in the Final Regional Plan.



Strategic Resource Options (SRO)

Feedback Summary

Strategic Resource Options (SRO)

Overall responses acknowledged the need for new supply side options and agreed that they would support the development on such SRO's in the region.

A number of responses voiced a need for further options to be included in the region plan, concerns were raised that if any of the SROs or demand management options are not delivered at the expected volumes or timescales that the Final Regional Plan may fail to meet the water needs of the region. Stakeholders also felt that the current plan couldn't be considered best value as so few strategic schemes appear to have been scoped.

A number of comments noted that the Final Regional Plan should consider the importance of creating more storage across all areas of the region to both increase local supply but allow for movements of water from west to east and east to west. However, a number of responses also highlighted the need to consider impacts of water transfers carefully, including potential environmental impacts and level changes which could cause potential impacts on navigation through tunnels or bridges which could cause damage to craft and infrastructure.

Multiple responses called for consideration of methods to retain more water at a catchment level, with some advocating for local solutions to hold water.

How WCWR will address this in our Final Regional Plan

The ability for water to be moved throughout the region is a key objective for WCWR because the nature of the West Country and the limited size of catchments makes the placement of large water resource options challenging.

We have 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 are committed to exploring new and effective water resource options across the catchment and since the draft WRMP has been published a significant number of additional resource options have neem considered to that WCWR can develop a true Best Value Plan. .

All options have been subject to Strategic Environmental Assessment (SEA) and further detailed investigations will be required to assess the potential for local environmental effects and if required any mitigation options.



Strategic Resource Options (SRO)

Feedback Summary

How WCWR will address this in our Final Regional Plan

Inconsistency with SRO options in Water Resource Management Plans (WRMPs)

There was a strong ask from stakeholders that WCWR works with South West Water, Wessex Water, and Bristol Water to ensure consistency between how SROs are referenced in the Final Regional Plan, and in individual WRMPs. It should also ensure any further changes to WRMPs are represented consistently in WCWR's Final Regional Plan.

The Final Regional Plan and WRMPs will see alignment regarding the implementation of the SROs across the West Country. We will complete a review and update of the selected options in line with final WRMP 2024 submissions from the constituent water companies. We will draw the final set of options from the three water companies' WRMP programs to cover the increase in water needed within the region.

Timing Of SRO's

It was suggested that there is a lack of certainty in the plan but that this should not cause delay in developing new sources which in turn can support environmental improvements. One stakeholder advised that some SRO's and drought measures may be needed earlier than proposed in current Draft Regional Plan and WRMPs

WCWR will draw this information through from the WRMP process and ensure the chosen options are implemented on a suitable timescale to deliver their intended benefit.

**Other areas of focus for the Final Regional Plan****Feedback Summary****How WCWR will address this in our Final Regional Plan****General Comments**

Multiple stakeholders put forward views on how the Final Regional Plan could be improved as it is finalised. These included a clearer narrative for how WCWR will meet the region's water needs and enhance the environment. There were also suggestions for the scope of the Final Regional Plan and how it should consider wider aspects of water management such as, water quality and flood management. It was also noted that consideration should be given to the supply chain and workforce shifts required to deliver what will be proposed in the Final Regional Plan. Several stakeholders also requested further information on areas of specific interest to them.

Suggestions were also made about how the report could be structured to make it easier to read for those not closely involved with the water industry. There was also a request for more technical information on the approach used in developing the plan.

WCWR is committed to action on a range of the feedback received as evidence in detail in the Appendix B of this report. We aim to produce a Final Regional Plan that will provide a unified representation of the options needed across the planning horizon. This includes ensuring the Final Regional Plan is structured and presented in a way which allows all stakeholders to engage.



Other areas of focus for the final regional plan

Feedback Summary

How WCWR will address this in our Final Regional Plan

Single Adaptive Plan

A number of comments demonstrate that some stakeholders feel the Draft Regional Plan has not yet achieved a single adaptive plan. Ofwat acknowledged that there is qualitative discussion of the plan being adaptive however, the plan does not set out which options are selected in the preferred and adaptive plans in detail and cannot be described as an adaptive plan at this stage. Ofwat commented that WCWR has not presented a single preferred best value adaptive plan with clear trigger / branch point dates.

This first Regional Plan uses the WRMPs from the water companies to present an overall regional water resource position and composite plan for the future, in the absence of an integrated regional water resource model. A commitment has been made to develop a regional model to present a Best Value Plan in the second Regional Plan (expected 2029). This will incorporate an adaptive planning approach which is consistent with regulatory guidance.

Plan Outcomes

Most stakeholders expressed agreement with the Draft Regional Plan outcomes although some suggested that the Initial Best Value metrics (page 34 of the main report) should be reviewed to clearly connect the plan's outcomes with policy requirements. In addition to this it was recommended that WCWR work to help stakeholders better understand the Plan Outcomes and proposals in the Final Regional Plan.

WCWR will outline clearly the final regional plans ambitions and outcomes together with future proposals for additional work. WCWR have committed to ensuring an outcomes and next steps section in the Final regional Plan.



Other areas of focus for the final regional plan

Feedback Summary

How WCWR will address this in our Final Regional Plan

Timescales

A number of stakeholder comments suggested that WCWR should review their timescale of options to ensure that environmental improvements would be delivered at a sufficient pace. The Environment Agency described research which suggests SRO solutions and/or drought measures may be needed earlier than proposed in current regional plans, and that improving connectivity within regions and/or between SROs would benefit drought resilience.

The Final Regional Plan will outline the deployment timescales of new options within the region. The environmental destinations that each company has outlined within their WRMPs will be fully represented in the Final Regional Plan.

The Final Regional Plan will also include each member's WRMPs strategy for meeting the 1 in 500 year drought resilience.

Alignment with WRMPs

Several stakeholders felt that there was a significant need for better alignment with the Water Resource Management Plans (developed by each individual water company). Some responses suggested inconsistency across preferred options and data tables between the Draft Regional Plan and WRMPs within the region.

WCWR will ensure consistency within the Final Regional Plan across itself and the WRMPs that are produced by Bristol Water, South West Water and Wessex Water.

This includes focussing on the final data sets to ensure alignment across the region and to convey one coherent narrative upon submission.

We will also continue to develop a consistent reporting approach from WRMPs to regional plan for the final submission.



Other areas of focus for the final regional plan

Feedback Summary	How WCWR will address this in our Final Regional Plan
<p>Feedback From Previous Consultations</p> <p>Stakeholders recognised that WCWR had taken on board feedback from previous engagement and made changes in the Draft Regional Plan, however multiple respondents felt that the Draft Regional Plan did not resolve all of the issues previously raised.</p>	<p>WCWR aims to respond to the consultation process by publishing this consultation response. We have taken the opportunity to respond to the consultation responses from the Emerging Regional Plan within the Appendix C of this document.</p>
<p>National Framework Reduction Targets</p> <p>A number of stakeholders highlighted the national framework objectives for reducing water consumption. It was suggested that the regional group could lead a change in thinking on how these challenges are addressed.</p> <p>Respondents would like to see more detail on how ambitious national targets can be met through regional action. It was suggested that this could focus on water-use education and public information campaigns alongside enhanced metering/smart metering.</p>	<p>The leakage reduction and water saving targets will be aggregated from the final WRMP24 submission and will outline the pathway WCWR will take to meet the reduction targets outlined.</p> <p>We are committed to understanding how demand management strategies can be improved and advanced within the region and will include greater detail on the options outlined within the Final Regional Plan.</p>



Other areas of focus for the final regional plan

Feedback Summary

How WCWR will address this in our Final Regional Plan

Legislation

Stakeholders highlighted a variety of environmental legislation and regulations that the Final Regional (or solutions within it, particularly around abstraction reduction) should comply with. These include the Habitats Regulations and Water Framework Directive. The need to apply for Scheduled Monuments Consent for any solutions that impacted relevant sites was also highlighted, and it was noted that it was not a guarantee that the consent would be granted.

The constituent water company draft WRMPs all work towards compliance with the relevant legislation. The Final Regional Plan will communicate the combined progress presented by the draft WRMPs company plans in achieving these regulatory requirements. Separately the SRO programme will follow all the necessary legislative process as they follow the gated RAPID review process up to submission of planning consent applications.

Net Zero

Stakeholders acknowledge the consideration of Net Zero ambition in the plan but wanted further detail, suggesting that WCWR has an opportunity to take this further and consider emissions more broadly. One stakeholder said they were pleased to see the analysis of the carbon footprint of the Draft Regional Plan but felt that the potential carbon saving benefits from reducing water demand are possible and could also be considered. Another asked how ambitions within the Water Industry Route Map will be met.

WCWR will include a section within the final submission on the progress against the 2030 Water Industry Route Map to Net Zero.

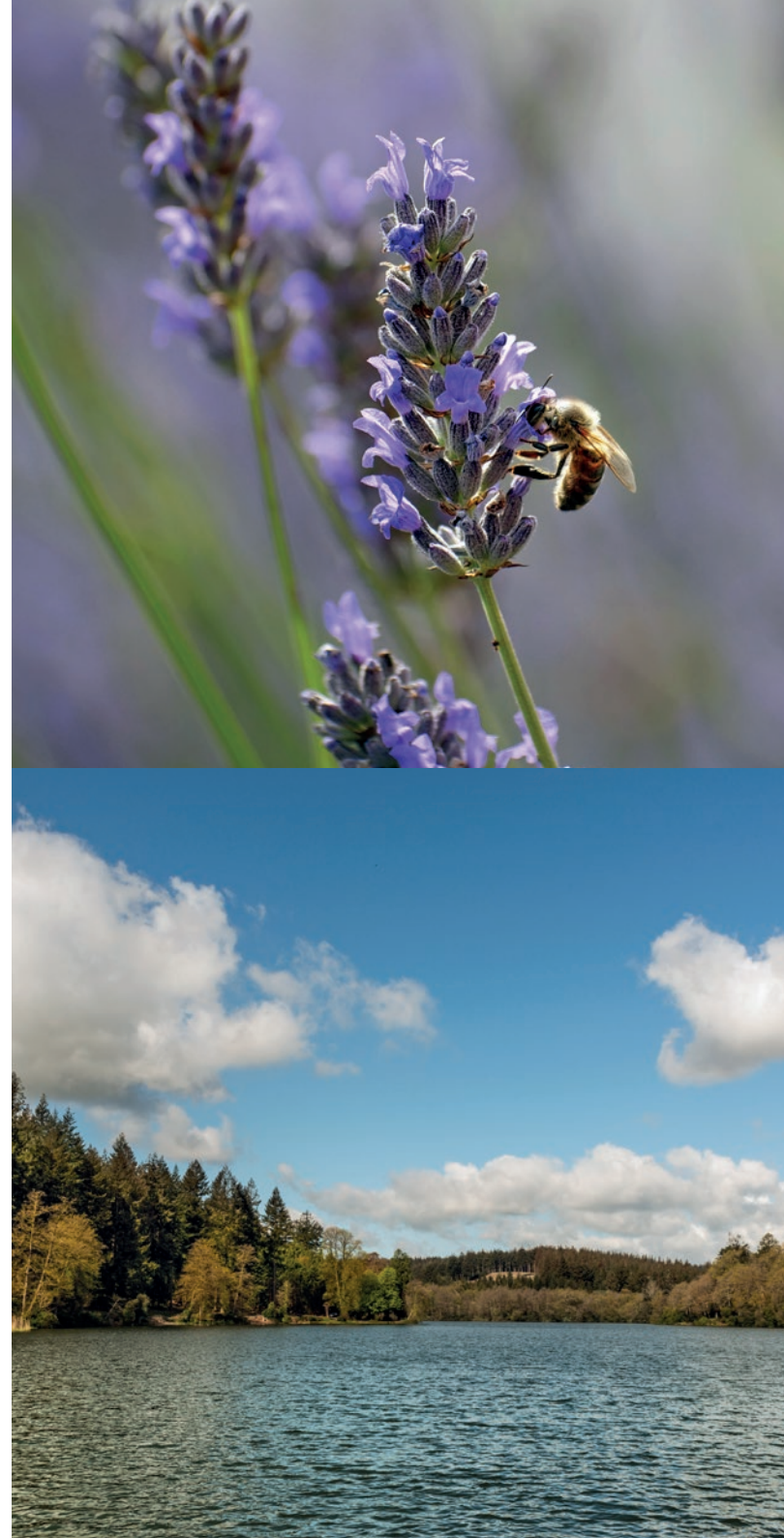
4 Next steps and ongoing engagement

During this engagement, it was clear that stakeholders recognised that the development of the Regional Plan was key to providing a regional structure to secure water availability and sustainability within the West Country for the next 25 years and beyond. There was a clear desire for further engagement as the development of the plan is progressed.

We will continue to engage with stakeholders as needed as we work to finalise our Final Regional Plan, which we expect to publish at the end of 2023.

We are also committed to continuing to engage beyond the publication of the Final Regional Plan and we are working on an Engagement Strategy that will help the region understand more about the contents of the Plan and how it will help secure water for the West Country.

Our Final Regional Plan will include a next steps chapter that includes proposed projects, stakeholder engagement and delivery milestone.





Appendix A

Inter-regional reconciliation 3: Commonality of approaches summary

Appendix A

Click below:

[Inter-regional reconciliation 3: Commonality of approaches summary](#)



Appendix B

Draft Regional Plan - Table of feedback comments and our responses

Appendix B

Draft Regional Plan - Table of feedback comments and our responses

Click below:

- [Part 1: Best Value Planning and Decision Making](#)
- [Part 2: Engagement and Collaboration](#)
- [Part 3: Environmental Destination](#)
- [Part 4: Supply and Demand](#)
- [Part 5: Strategic Resource Options](#)



Appendix C

Emerging Regional Plan - Table of feedback comments and our responses

Appendix C

Click below:

[Emerging Regional Plan - Table of feedback comments and our responses](#)



Appendix D

West Country Water Resources webinar presentation

Appendix D

Click below:

[West Country Water Resources webinar presentation](#)



Appendix E

West Country Water Resources webinar questions and answers

Appendix E

Click below:

[West Country Water Resources webinar questions and answers](#)