South West Water

Appendix One

Consultation feedback and our responses

Contents

1. Customers

A number of our customers responded to the consultation on specific issues, expressing very similar opinions on the topic. To minimise duplication of these comments and responses, we have grouped them together under the topic headings below. The full consultation responses from our customers and other stakeholders are provided in Appendix 3 to this report.

ID Reference: 001		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Why are the reservoirs not filling at a faster rate bearing in mind the heavy downpours we have had? Look at the rivers during this period and the flow rate is extremely high but most of that water heads straight out to sea. The River Fowey is a typical example. Why is Collingford reservoir not enlarged? Maybe it's in the wrong place but was suitable when first built but now not capable of capturing the quantities of water that is required for todays demand.	Colliford Reservoir is not limited by its size but rather by recharge rate and water available to refill through winter pumped storage. The recharge of reservoirs is complex and will depend on factors such as the size of the catchment, the soil moisture and operational use. Colliford is an example of a reservoir with a small, natural catchment which makes it refill more slowly. Enlarging the reservoir via raising the dam is complex and would require a long period of assessments and investigations. Multiple alternative options are being considered improve resilience in Colliford Water Resource Zone (WRZ).	Please see section 5 (Supply forecast) in our main Technical Summary for more information.

ID Reference: 005		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
The key issue is that the solution needs to be integrated across the UK as a whole - a piecemeal solution will not be as effective & will undoubtedly cost more. By looking at a UK wide picture, the mismatch of supply & demand will become very evident, and this will point to those areas where action needs to be taken. I would suggest that the resultant business solution should parallel the implementation of the electricity supply, where the basic infrastructure is centrally owned & the operating companies then generate, supply & distribute electricity to the customer base. This of course will require a wholesale shake up of the water industry, but at least it will get it on the correct UK wide footing.	We are working closely with RAPID and the West Country Water Resources Group to assess potential Strategic Resource Options. Some of these, such as Poole Harbour and Mendips Quarries, are included in our WRMP.	More information about the WCWRG is available here.

ID Reference: 007		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**

I have had a quick look through the consultation documents and I see no mention of Chew Valley? It's not included in the 'our area' section.	Chew Valley sits within Bristol Water's area of operations so it is not referenced within our dWRMP24.	The Bristol Water WRMP is available here: Bristol Water WRMP

ID Reference: 010		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
I like probably most of the residents of the South West and Torridge in particular are shocked at 2 events last year with the state of South West Waters performance. First how quickly a hot dry year reduced the level of reservoirs and caused water supply problems and restrictions. I have moved from Nottingham where this isn't an issue. Second the frequent and often illegal discharge of untreated sewage into the rivers and sea, such that we will not take the health risk in swimming at Westward Ho! beach or any other water course, which is a terrible state for the country to be in. These 2 issues need to be fixed.	Thank you for providing your thoughts on these issues. The drought was unprecedented in the South West. We have since published our drought plan and our draft WRMP sets out the measures we intend to take to ensure our water supplies are resilient for the short, medium and longer terms. We do not purposefully release diluted sewage. Overflows are mechanisms built into the sewer system to prevent inundated sewer pipes backing up into customers' homes and businesses. They are 'consented' by the Environment Agency, our environmental regulator. Our sister strategy, the Drainage and Wastewater Management Plan (DWMP), is developing the future investment programme to reduce the risks of storm overflow discharges.	Our 2022 Drought Plan is available here: drought plan More information about our DWMP is here: drainage-and-wastewater-management-plan
Our house has 2 water butts to collect rainwater for garden use and we are careful on water use. So we are doing our bit! My suggestion requires some grand old joined up government industry thinking which is needed but probably to difficult for Defra and Energy (not sure what the dept is called now!) to get organised. I watched Guy Martins Channel 4 Energy program where he said the problem with wind and solar power is it is intermittent and needs storing. But the UK has only 3 pumped storage hydro plants and needs 30+. So instead of wasting Billions digging our roads up, including mine, upgrade the gas pipes to yellow plastic ones for futuure hydrogen central heating, that all the reports say is unviable, use the money to built pumped storage hydro. Built more reservoirs on Dartmoor, Exmoor and other higher places, collect more rainwater and pump water up to them when there is excess wind from the celtic sea wind farm when built and regenerate electricity when needed.	We are proposing new reservoirs as part of our WRMP to ensure resilience for our future water supplies. The number, location and potential construction timescales depend on planning permissions, costs and benefits, customers' willingness to pay for major new infrastructure development and a positive Strategic Environmental Assessment, all to the satisfaction of our economic and environmental regulators.	Please see Section 7.5 (Supply Options) in our main Technical Summary for more information.

ID Reference: 013		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
For many years, the UK has trailed behind Europe in installation of high efficiency flush toilets, including "dry pan" types. I believe that this plan will not	Your comments are of great interest but, unfortunately, the initiatives you highlight are not issues over which we have any influence. Much of this sits	N/A

succeed unless it is accompanied by a campaign to require all new-build residential property to be fitted with high efficiency toilets. It would also help if this was accompanied by other water saving devices, a full or partial ban on "power showers", and promotion of high efficiency domestic appliances. It may be practical for SWW to market such devices, along the model that used to be operated by the electrical and gas supply utilities, during the period that they were in public ownership.	with the development policies issued by local planning authorities although we do provide advice on sustainable development to inform their policy development. We also provide free water saving devices to our customers. We do not market third party suppliers of any products as this would be deemed as providing a preferential bias in an open market.	

ID Reference: 018		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Perhaps you could investigate why it took months for a water leak on the road outside my house to be stopped. The road was dug up in the wrong place. The leak continued with water pouring down the road. I drew this to the attention of the water board on numerous occasions. But it wasn't until a neighbour complained that they finally dug where the leak was coming from and repaired it. I have asked for compensation as well as drawing attention to south west water about this unnecessary waste. But have been fobbed off.	Thank you for drawing this to our attention. We will pass your comments to our customer services to provide a response.	Our customer services are aware of this issue

ID Reference: 019		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
I would like to put an idea to the water company. When building new properties like mine near a stream why not do extra drainage and take all the rainwater to a stream nearby that way it wouldn't be going to waste and into the sewage pipe. But this is too easy to save water and money in the long run for anyone to think and do this. I hope someone will look into this idea.	Our sister strategy, the Drainage and Wastewater Management Plan (DWMP) has considered issues of drainage such as this. However, we only have an advisory role in terms of the house building industry and in support the advice provided by local planning authorities to developers on sustainable drainage.	More information on the DWMP can be found at: drainage-and-wastewater-management-plan

ID Reference: 020		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**

I would like to make some comments and suggestions. In the summary, I did not see any mention of changing pricing in order to encourage lower usage, especially for households. The Plan did say that customers are very surprised when they learn how much they use. A key way to reduce consumption is to send a clear pricing signal and incentive, to change usage habits. Just asking people to use less doesn't work anywhere near as well as sending a price signal. For example: the charge per unit of water could be set at a lower level, up to a certain amount of usage for any usage above that level, it could be priced considerably higher. In any case, water should be priced higher than it is, given that it is such a precious commodity - which certainly isn't reflected in current pricing. I realise this isn't popular especially in the current economic climate. But low income households could be given some support and the rest of us hopefully can afford to pay more. Also, as a household who uses well below the average consumption per person, I would like to see a fairer direct debit option. When I checked this recently on the South West Water website, it was a standard rate, which was far higher than what my household actually pays. I hope this is helpful. I would gladly pay more for my precious water.	Thank you for your positive views on the real value of water. We are going to explore the potential for variable tariffs over the next 5-years but recognise that these must be acceptable to the majority of our customers, especially in the current economic crisis. We have a variety of schemes and tariffs designed to support customers struggling to pay their water bills or who have priority requirements.	More information on support schemes for individuals and families in financial hardship is available at: practical-help

ID Reference: 025		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Private water company's were established to allow more much needed investment in the infrastructure not maintain the status quo, Some of the recent positive words/communication may be warming us up for an increase in water charges when investment in previous years has not occurred as it should and the consumer will be expected to make up for the lack of previous investment. The correct approach would be a few percentage points increase to ensure the lower paid in SW water have a decent salary increase, any investment needs should not be funded by customers. Whilst the situation is very disappointing , SW water appear to be more proactive than our previous water company in the south east however it does appear late in the day rather than planning to prevent, they are reacting to events, with no real reserve or excess capacity.	Our WRMP is investigating all the issues you raise. We need to increase our capacity and sources of supply, invest in new facilities whilst meeting the needs of all our customers and business, and meet our responsibilities for environmental protection and enhancement. At the same time, we need to keep the costs to our customers as low as we possibly can - especially given the current cost of living crisis. We have collaborated with a wide range of partner organisations, regulators and consumer representatives to consider all these aspects on an equal footing, and together we have identified a range of feasible proposals that we trust will be affordable for our customers over the next 25 years.	Please see section 2 (Our Planning Approach) in our main Technical Summary for more information.

ID Reference: 027		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
DEFRA currently have a scheme whereby Farmers can apply for a grant to assist in installing water tanks for the collection of rainwater, however the scheme is so stupidly over complicated and instead of just getting a tank you are forced to get UV filters and pumps etc which makes the grant completely unaffordable and also stupidly over specified. How about supplying large water tanks (10,000l or more) for the collection of rainwater which can then be used on farm for cleaning, watering animals, plants and crops which do not require sterilised water. In addition we use our collected water for the washing out of livestock trailers and equipment throughout the year. In doing this you would reduce the demand for water from farms, reduce run off from concreted/roofed areas and thereby reduce the risk flooding and water contamination. We currently collect our roof run off water and it enables us to water our sheep and cattle over the winter without taking any from the mains and it summer it allows for the watering of the garden, fruit trees, veg patch and our newly planted hedges as well as keeping the ducks, chickens and geese happy.	Thank you. Both issues raised are matters for our sister strategy, the Drainage and Wastewater Management Plan. We have passed your comments to our colleagues working on this plan.	More information on the DWMP is available at: drainage-and-wastewater-management-plan

ID Reference: 028		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
I believe any strategy proposed by South West Water is doomed to failure. I cannot see how they may succeed when they cannot even provide us with clean water here in Exmouth. The winter they provide stinks, it ruins the taste of tea and coffee and leaves disgusting black marks in the lavatory bowl and around baths and showers. Before the pandemic we had an “expert” visit the house to take samples of our water - he confirmed the smell. But since the day he came we have heard nothing. If South West Water cannot contend with the water supply to one average house I think any Strategy they have in mind is a waste of their time, your time in considering their proposals and most importantly, my money.	Thank you for raising this with us. We will pass your comments to our customer services.	This has been passed to our Customer Service team.

ID Reference: 035		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
There is no mention in this plan about monetary resources. I would like to know what proportion of our water bills are paid out to shareholders please. This very important in assessing how efficient the company is. Thank you.	We transparently publish this information on an annual basis in the financial section of our Annual Report. The last report published was for 2022 – 2023.	Our Annual Report for 2022 – 2023 is available at: how-we-are-performing

ID Reference: 036		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
I support: the adaptive planning approach and I support the plans for recycling and re-use of water, - the 1 in 500 year drought event resilience plan, subject to there being capability within the plan to change it within the lifetime of the plan if the current predictions being used on climate change prove to be underestimates of the speed of change - the plans for nurturing the environment and giving greater value on the natural environment and diversity of life. However, the plan should emphasise that SWWater will be meeting legal obligations at the outset of the plan (not by some future date). This will require government action to ensure that existing legislation to prevent sewage pollution and agricultural run-off and other pollutants is upheld and strengthened. EU derived legislation protecting the environment must be maintained. The Environment Agency needs to be sufficiently funded to fully carry out its monitoring role, to ensure SW Water is meeting its stated aims - plans for a resilient infrastructure. Hotter, drier summers will put increasing pressure on an already fragile environment. River flows must be given priority over consumer needs in drought situations - plans to reduce demand and meet needs. The plans should focus on providing water resources to meet needs, not demands, before investing in energy-intensive projects such as desalination. This will require government support in consumer education. - the restoring of uplands and moorlands - the plan to engage with local environmental partnerships, rather than establish new ones. - the plan to provide water butts, but would suggest that SWWater should also support installation of the butts for those unable to do this themselves.	Thank you for expressing such positive support for many of the proposals in our dWRMP24. We fully intend to develop and implement the proposals the plan sets out through working in relevant partnerships with a wide range of stakeholders and communities. We have taken note of the points raised regarding the requirement to adapt rapidly to a changing climate, resilience and supporting our customers. Meeting our legal requirements is a paramount requirement.	Please see section 10 (Our Water Supply Plan) in our main Technical Summary for more information.

ID Reference: 036		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
It is difficult to say whether the plan represents best value for consumers. Rather than say how much money is planned to be invested, it would be better if the plan instead stated what targets will be achieved by 2030/2050. It will be easier to hold water companies accountable for targets, rather than amount of money spent (which accounting practices can 'massage'). If the water companies were to be re-nationalised, money that is currently being siphoned off for profits could be reinvested in our water supplies.	We will consider if this is possible. We have followed the government's guidance in developing our WRMP24 but will consider including more detail on targets for the next iteration. Ofwat is responsible for setting the regulatory framework and overseeing the performance and pricing of water companies in England and Wales. Pennon Group is also listed on the London Stock Exchange and is a constituent of the FTSE 250 Index. Companies listed on a stock exchange are subject to a set of rules and regulations that govern their operations, disclosure requirements, and obligations to shareholders and the broader market.	Please see section 10.2 (Preferred Plan – Best Value Plan) in our main Technical Summary for more information.

Grouped customer responses to the WRMP consultation:

ID References: 003, 015, 026, 035, 037, 043, 045, 068, 073, 074, 075, 076, 077	**Shareholder dividends**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
It's all about making the shareholders rich. You are a monopoly with no proper regulation so you will continue to do as you please and exploit rate payers as long as you make a profit and can continue to pay overinflated dividends to shareholders and an obscenely large salary to the CEO with bonuses. You will not invest. Stop paying any dividends to shareholders, and Directors bonuses should be cancelled freeing up more than enough money to invest in fixing all leaks, delivering quickly and getting sufficient storage. Then drop the price of water. The balance of spending needs to radically change to fulfil the social obligation. Captive customers are seen as a resource to be milked as far as possible.	Since privatisation in 1989, Pennon have invested nearly double the amount paid in dividends into South West Water's capital investment programme. As a regulated business, our returns are set by the regulator. Around two-thirds of Pennon's shareholders are UK pensions, savings and charities, as well as our employees and customers. Through WaterShare+, our customers are also our shareholders – with around 1 in 14 households across the region now shareholders, and 1 in 30 of Bristol Water customers participating too. This gives our customers a stake and a say in their water company. We are very aware of the growing concerns from customers about dividends. As we continue to accelerate the changes we all want to see, we will ensure dividends are not made at the cost of greater investment. Each year, our annual spend totals around £900m. Approximately 50% of this is spent on investment in our infrastructure and assets, and day-to-day running costs. Day-to-day running costs include maintenance costs related to our network and treatment works, chemical costs for water treatment, and other operational costs. In addition, we also have to pay our taxes, pay our staff salaries and pay for the power we use. These are all considerable outgoings. Only 8% of our revenue each year is spent on dividends. Pennon Group, including our subsidiaries, are delivering record levels of investment, particularly in environmental initiatives such as reducing storm overflows and developing new water resources. Alongside this, we have delivered over £85 million of customer support, including the industry leading WaterShare+ scheme, benefiting customers in the South West region. Both our Chief Executive and Chief Financial Officer are paid at the lower end of the FSTE 250, and last year received the lowest annual bonus outturns across the sector (17 companies) for 2021/22, recognising there's more to do on our environmental performance. The remuneration package for executives is conditional on delivery of robust financial, customer and operational and personal objectives, as well as value created for shareholders, which is overseen by our independent board. No executive got paid a bonus for the non-delivery of environmental targets.	We report on all these issues in our Annual Report. Our last Annual Report for 2022 – 2023 is available at: how-we-are-performing

	For this year, our CEO, Susan Davy has chosen to forego her bonus. Instead, the money will be invested into our unique WaterShare+ scheme which goes directly to our customers, giving them the choice to own shares in Pennon and a say in the running of our business or to take a credit on their bill. Susan and the Board feel this is the right thing to do and is further evidence that we are taking action to prove we are listening to our customers.	

ID References: 001, 036, 075, 076	**Re-nationalisation**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
We are forced to pay water rates to a monopoly. Its all about power and control. You're the most expensive water supplier in the UK. You have taken our money and have not invested it for our benefit. You have had it too easy for too long. It is now time for DEFRA and the Environment Agency to deliver on behalf of water users in the South West. The only solution is to renationalise with the worst performing water companies brought back into public ownership - which will include South West Water. Most people in the South West have had enough and will thoroughly support re-nationalisation.	South West Water have kept increases to its average household bill for water and wastewater services for 2023/24 well below inflation, alongside record levels of investment. The average bill, for this year, increased by less than £5, to ensure they remain affordable during the cost-of-living crisis. The average household bill for water and wastewater services for 2023/24 will be £476, compared to £472 last year. We understand the challenges of the cost-of-living crisis for our customers, which is why we have worked hard to minimise any increases. We strive to help any customers who need it, and we encourage any that are worried about their bill to get in touch and see what additional support we can offer. Whilst our focus is always on keeping bills low, we are also undertaking a wide range of initiatives to help customers during these challenging times. This year the company has supported customers with £68 million, providing a range of support measures for customers struggling to pay their bills and vulnerable customers. Over 79,000 customers expected to access financial support between April 2020 and April 2023. By April this year, 42,000 customers will have been taken out of water poverty through South West Water's support tariffs as part of its industry-leading ambition to eradicate water poverty by 2025. We are rigorously assessed by the EA on our Environmental Performance Assessment (EPA). Our EPA rating has been 1-star in recent years, but this year it rose to 2-stars. We know we have more to do and we are still not where we or our customers expect us to be, but we are improving. To achieve the top rating of 4 stars, we must double down on our pollution incident reduction plan and ensure a more resilient water resources position. In addition, we are also addressing the environmental issues that matter most to our customers in our region, such as storm overflows, with 100% monitoring now in place and our 100% coastal bathing water compliance for the second year running.	We report on all these issues in our Annual Report. Our last Annual Report for 2022 – 2023 is available at: how-we-are-performing More information about our financial support schemes is available at: practical-help

	We want customers in the South West to be assured that our plan is working. We are doing more than ever to protect the natural environment, enhancing the quality of water in our seas and rivers – a vital part of the South West's natural assets. To do this, we have been making record levels of investment, and just recently announced an additional £750m investment for the South West, with new jobs and generating opportunities for the wider supply chain. Part of this investment will also support our ambition to break the drought cycle for the region. It's this continuing investment from our shareholders that ultimately will deliver the change we all want to see.	

ID References: 004, 010, 015, 027, 036, 037, 038, 043, 073, 074, 075, 076	**Wastewater management and sewage releases**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Stop dumping sewage in the rivers. Lack of investment in infrastructure has led to unacceptable dumping of raw sewage into water courses and the sea, and this government has just given water companies permission to continue this for the next 25 years. Your ambition in preventing this looks feeble. It should be an absolute priority as currently it's a disgrace, a public health risk and a shame to a civilised country. Everyone knows that this is entirely solvable by spending money on updating and expanding infrastructure. The capacity of all treatment works which are currently discharging overflows on a regular basis must be increased, to ensure consistent supply of clean water to our rivers. It is criminally negligent that there is absolutely zero focus on the scandalous amount of sewage discharge into our rivers, lakes and seas within this plan. This glaring omission means that this plan is nowhere near fit for purpose.	Thank you for your comments. We are working to resolve the issues arising from our wastewater infrastructure. However, the WRMP focuses on water supply whereas our sister strategy, the Drainage and Wastewater Management Plan (DWMP), is focused on the risks and options for managing wastewater and drainage issues. We have passed your comments to our colleagues working on the DWMP.	More information on our DWMP is available at: drainage-and-wastewater-management-plan

ID References: 004, 013, 021, 023, 071, 080	**Impact of Tourism**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Our population grows from 560,000 to 3 million during the summer months, and yet there is no allowance for such a demographic shift by South West Water. There is sufficient circumstantial evidence that water consumption is far higher amongst short-stay tourists than amongst permanent residents. They are on holiday and if they want excessive showers and luxurious baths in	Many of our customers have expressed similar thoughts. We do undertake targeted visits to holiday homes and tourist accommodation to discuss water efficiency issues and we have a programme of installing smart water meters across our region in all properties. However, making visitors to the region reduce their water use and / or contribute more financially is not an issue we	Please see section 9 (Our Demand Management Plan) in our main Technical

their rentals, they will. Hot tubs are emptied and refilled. You need to get the water efficiency message out to the holiday maker, big time, with posters and notices everywhere they go. Consider a way to fine or charge more to over-users. There is a crisis in Cornwall and this must be taken seriously but holiday makers in particularly feel that its not their problem. Don't give priority to tourists. Locals are far more important.	can directly influence. Having said this, we have a broad range of water efficiency options in our updated dWRMP24 and we are actively working with holiday parks piloting water efficiency measures.	Summary for more information.

ID References: 003, 018, 068, 072, 073, 077, 080	**Leakage**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Don't preach about saving water until you are leak free. The size of leakage eclipses all other pressures including population, growth in demand and climate change. Why produce drinking quality water only for it to escape in leaks? You have consistently failed to repair leaks or improve the infrastructure. At the very least this requires public apology and acceptance you have failed, coupled with a detailed scalable plan of how you will correct your failure. It is beyond doubt that a step change in leakage reduction should be a major focus for the future.	We are investing over £50 million in our leakage recovery plan to help us achieve a minimum of a 16% reduction during AMP7 (2020 - 2025). Our WRMP sets out our goals for building on the leakage reduction programme by ensuring we meet our revised leakage targets of 30% by March 2032. We will set out a comprehensive suite of demand management measures in the revised Demand Strategy section of our updated dWRMP24.	Please see section 9.2 (Leakage) in our main Technical Summary for more information.

ID References: 017, 033, 051, 052	**Environment**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
You should be adopting a more enterprising approach to protecting the environment and comprehensively enhancing the land to make a major contribution to rewilding, increasing oxygen and reducing carbon dioxide levels. Dartmoor Forest should be reforested with oak, hawthorn and other native deciduous trees. Devon has miles of grass fields dominating the landscape. This is a major undertaking but you could make a significant difference to climate change if you approached it at scale. Reforestation should be an essential part of the Plan. Unsustainable volumes of water is taken from our rivers and lakes and the WRMP is proposing to increase how much water it takes. This will have devastating impacts on habitats and wildlife, and particularly on migratory fish. You need to ensure abstractions don't result in catastrophe for river health.	Thank you. We probably own much less land than you think, but we collaborate closely with the catchment partnerships which have members comprising landowners, farmers and the Wildlife and Rivers Trusts. We also have a comprehensive environmental protection and enhancement programme and part-fund the catchment partnerships to co-create and co-deliver shared schemes including peat, woodland, river and countryside restoration. Each and every abstraction licence is agreed with and set by the Environmental Agency to ensure abstractions remain sustainable and can maintain the health of the riverine environment. We must always comply with our licences. Protecting sensitive and environmentally designated sites is of vital importance which is why we are proposing abstraction capping in such sites.	More information on our abstraction licences and the work we do in partnership schemes to protect and enhance the environment is found here: environment

ID References: 001, 004, 005, 006, 010, 014, 017, 022, 024, 029, 037, 040, 043, 073, 080	New sources of supply	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
The draft WRMP does not clearly state where water will come from to meet the deficits or the quantity needed. More reservoirs should be built and existing reservoirs enlarged as they are not capable of capturing the quantities of water that is required for today's demand. You need to build desalination plants although in South West England, land of constant rain, this looks comical, is an expensive distraction and should be avoidable. Why not recycle treated water from wastewater treatment works? Consideration should be given to transfers between the three main reservoirs and links and transfers made with adjacent water supply areas through an integrated water network. Why have you not found a way to divert and capture the water that falls freely from the sky? Most surface water heads straight out to sea and should be captured and stored.	Thank you for your feedback and suggestions. As part of our work on the supply options screening we have carried out a thorough review of UK and worldwide research into more innovative options for water resources. Desalination is being considered along with a whole suite of supply option types. All options are then fed into a model where all the relevant factors are considered to produce our best value plan. The operation of the water resources within the zones is complex and is agreed between the water resources and operational teams. This ensures that we are using the resources in a way which best secures security of supply for our customers but also reduces costs and carbon impact.	Please see section 7.5 (Supply Options) in our main Technical Summary for more information.

ID References: 001, 037, 020, 047, 078	Water efficiency and metering	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Limiting the supply of water saving devices to one per household is shortsighted as these days many households have more than one bathroom. You tell us we cannot use the water we are paying for. Does this mean that we will be able to get a refund for the water we are paying for but are not allowed to use! It is absurd that the plan does not include immediate mandatory universal metering for all. Unmetered properties carry on watering the garden, washing the car, topping up the pool and jet washing the patio. Their actions have no consequence for themselves. It's someone else's problem. There is no incentive to reduce water use if you are not paying for what you use. If you're serious about encouraging customers to use less water, send a clear pricing signal to incentivise them. Offer discounts to low users, penalties to high users. The charge per unit of water could be lower to a certain level of usage, and then priced considerably higher above it. In any case, water should be priced higher than it is, given that it is such a precious commodity - which certainly isn't reflected in current pricing.	Thank you for commenting on these issues. We will continue our water efficiency campaigns and the free issue of water-saving devices for both household and non-household customers to reinforce the value of water and to drive water consumption messaging. We are actively reviewing how we can increase smart metering installations for household and non-household and looking for ways to partner with other organisations to disseminate water efficiency information more widely. We are also investigating how we could introduce tariffs such as rising block and/or seasonal tariffs to ensure our customers benefit from reducing their water use.	Please see section 7.4 (Demand Management Options) and section 9 (Our Demand Management Plan) in our main Technical Summary for more information.

ID Reference: 001, 002, 004, 011, 016, 017, 031, 036, 043, 071, 081	**Planning and Growth**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
We are experiencing a massive building programme here in Cornwall, all wanting supply but with no way to relieve this without tapping into our already exhausted water supply. This pressure will only continue to grow due to increasing population and yet South West Water does not object to this building 'explosion'. You should be able to veto development plans where the water infrastructure is unable to cope. No more building of houses until infrastructure and new reservoirs have been built. With the increase in housing, provisions for extra water should have been made decades ago and plans should have already been implemented to cope with extra pressure. You should also be actively campaigning to prevent large scale housing development from eating up our countryside where we are losing important wildlife habitats and marshy meadows that provide a natural defence against flooding and erosion. It should be mandatory to harvest water from all proposed new builds, either domestic or commercial with grants available for retrofitting in existing properties. Greywater recycling facilities should be built in with underground storage tanks plumbed in to supply washing machines and toilets. Surely a 25 year vision would encourage water harvesting, treatment plants and infrastructure to be completed before new estate building? Developers should provide sufficient facilities, or fund South West Water, to accommodate such a population growth and South West Water needs to liaise with councils regarding planning applications being approved.	Since publishing our first Water Resources Management Plan in 1994, we have continued to update our view of what the future will look like in terms of both the available water supply and demand on our systems. Population growth projections have been a key element of this planning from the outset, and we continue to use data from the Office for National Statistics and Local Authorities to inform our projections of future demand. Our role is to support social and economic development and therefore we cannot veto development proposals and must ensure that new housing and development can connect to our services. Further, we cannot influence government decisions over the future of the water industry. We do not determine where and when development takes place. This is the role of the Local Planning Authorities (LPAs) and the Local Plan. We work closely with LPAs to understand where new development is proposed and track this from planning application through to approval. This allows us to understand when or new or extended water and wastewater facilities will be required so we can ensure the appropriate infrastructure is in place and in time to meet the demand. Similarly, we do not have powers to direct mandatory requirements for new build. We would like to see mandatory requirements for water harvesting, sustainable drainage systems and grey water recycling in all new builds and we work closely with LPAs to provide advice on how new build can be developed sustainably. The LPAs will decide on the requirements of the Planning Approvals granted and it is their responsibility to monitor compliance.	TBC There's more information about the work we do on development issues on our website at: building-and-development

2. Statutory organisations

ID Reference: 054	Devon County Council	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
We support the approach set out in the Adaptive Strategies where demand reduction measures are implemented first and further supply measures kick in where monitoring shows that this has not been enough. We would prefer a stronger emphasis on nature-based solutions and a wider catchment approach.	Thank you for your support on these proposals. Water companies are required to identify integrated catchment and nature-based solutions in their WRMPs. These should deliver multiple benefits, for example reducing flood risk and improving resilience of the environment to droughts. It is also recommended that water companies deliver these measures at a catchment scale, either working solely or in partnership with other catchment-based organisations. We have incorporated a significant programme of catchment management and nature-based solutions for water resources and resilience benefits into our PR24 Business Plan and accompanying Long Term Delivery Strategy. These investments will primarily be delivered under the auspices of the collaborative Upstream Thinking scheme, but also via the wider natural resources investment programmes (for example, peatland restoration). In addition, a WINEP investigation to evaluate the water resources benefits of catchment management is also planned in AMP8, and to expediate the mainstreaming of this work, we have secured £1m funding from the Ofwat Innovation Fund to deliver the Water Net Gain project, which will undertake research into farm business and water supply resilience across the region. We have developed a best value framework that considers both the cost, carbon and environmental impact from building new assets, against the level of resilience each option provides, and the value our customers place on avoiding drought restrictions and water conservation from reducing leakage or reducing consumption. This provides a framework that allows us to balance these competing needs. We've updated our WRMP to align with and go beyond the actions outlined in the drought plan which means that these options are now being considered. All of these options will be fully considered against the environmental hierarchy.	More information about our work on improving the environment such as Upstream Thinking, Nature Based Solutions and peatland restoration are available here: nature-based-solutions
A 50% reduction over 30+ years seems low and a higher ambition would greatly help reduce the need to increase supply. Savings from leakage are not quantified in the summary and it would be useful to understand how much it is thought is being lost and can be saved.	Our WRMP data tables do provide this information, but we will clarify the water saved through leakage reductions, in our final submission. We are also assessing differing levels of leakage reductions to identify the optimum level of investment. As the level of leakage reduces, the cost per litre of water saved through leakage intervention increases exponentially - we are therefore assessing the costs and benefits of differing leakage ambitions as part of our updated submission	Appendix 6.1 summarises the different leakage scenarios developed and our Technical Summary section 9.2 has more information.

This plan will impact on a range of our interests, both statutory and wider environmental and economic concerns. We appreciate the huge challenge faced in meeting demand from a growing population within environmental limits and adapting to more extreme weather events. We accept that additional supply will be required to meet these challenges. However, we are concerned that there is a greater reliance on supply-side solutions rather than demand management.	We have re-assessed the scale and pace of our demand-side strategy to ensure we focus on reducing demand and meeting, or exceeding, our performance commitments on leakage and PCC. We are prioritising demand management and reduction activities alongside a range of supply options to increase resilience.	Please see section 9 (Our Demand Management Plan) in our main Technical Summary for more information.
Proposals to abstract from quarries, new reservoirs and de-salination plants in Cornwall do not seem to be factored in. From the de-salination webinar in March, it seems that these proposals are being taken forward now. We would like greater clarity on the level of resource, which will be allocated to these measures, as they require considerable investment in time and effort to be successful. Given that the latter 2 options will require considerable construction work with high embodied carbon costs and, in the case of de-salination, operational energy costs, we suggest this plan and the resources allocated should be assessed against a hierarchy of best environmental options. There is a table which sets out proposed expenditure of about £1.18M across the region in AMP 8 on the water efficiency campaigns. Is this commensurate with the challenge? They could be much more cost-effective than engineered supply solutions.	All our options are subjected to full Strategic Environmental Assessment and the methodology we use to select our Best Value Plan does exactly what you suggest, which is to assess the cost-benefit ratios of different implementation scenarios using a suite of social and environmental (natural capital) metrics. We have improved the explanation of this approach and the information relating to our proposed demand-side options in our revised dWRMP24, setting out in more detail the individual initiatives that will be delivered to reduce overall demand.	Please see more information in Appendix 6: Best Value Planning Approach and Methodology and Appendix 7 the Strategic Environmental Assessment
Recycling and re-use, including increasing capacity at water treatment stations seems very sensible. However, the detail of the schemes will be important where considerable infrastructure or pumping is required. We would welcome the creation of more small-scale wetlands in Devon as a storage option.	We completely agree with you that nature-based solutions (NBS) such as wetlands have a vital role to play in meeting the water resources management challenges we face. The potential of NBS and catchment management interventions to help address various environmental challenges, including water resources management, is increasingly being recognised. NBS such as reforestation, afforestation, ponds and wetlands have all been demonstrated to enhance water infiltration, support groundwater recharge, and increase baseflows in river, thus improving water availability in the environment. We are initiating a programme of investigations and pilot studies over the coming investment cycle to determine the scale of this contribution in more detail, so that we can include these interventions in our future plans. In addition, in 2023 SWW and Westcountry Rivers Trust have been awarded £1 million in funding from the Ofwat Innovation 'Water Breakthrough Challenge' Fund for a project called Water Net Gain. This project will engage farmers in research to determine whether a catchment-scale approach with payments for storing water on their land in wetlands and ponds could improve water resilience for themselves, wider society and rivers.	Please see section 7.5 (Supply Options) in our main Technical Summary. More information on the Water Net Gain project is available here: water-net-gain
It is disappointing to see that the target for peatland restoration across Exmoor, Dartmoor and Bodmin is another 100 ha over the next 25 years. It would be useful to understand if there is more potential and also to consider other potential areas for habitat restoration and wider catchment approaches.	The South West Peatland Partnership (SWPP), led by SWW, is working to restore 2,634 hectares of degraded peatland across West Penwith, Bodmin Moor, Dartmoor and Exmoor. The partnership also enables the delivery over 1,000 ha of peatland restoration for Green Recovery, Upstream Thinking and	More information on our Peatland

There are additional and demonstrable benefits for water quality, attenuation of peak flows and resulting flood risk and for biodiversity and carbon sequestration. We understand that at the moment the evidence for increases in water supply is not strong but of course it is difficult to measure any changes and to understand the scale of interventions needed. In any case, such measures deliver against other performance commitments that SWW must meet and which can be delivered in an integrated manner by such catchment-based interventions. SWW's long-standing 'Upstream Thinking' programme has already established a superb foundation, which we strongly support and we are calling for a further scaling-up of this effort. We welcome the intention to ensure water abstraction from rivers respects environmental limits as this will help protect and restore biodiversity and meet legal obligations.	WINEP on the headwaters of the Avon, Dart, Meavy, Tavy, Taw, and Okement by 2025.	Partnership can be found here
We welcome the plans for decarbonisation of operations and investments and would like to see an estimate of the impact on carbon emissions of this plan. Again demand-side measures tend to have a lower carbon impact than engineered supply-side interventions.	We have an ambitious commitment to be carbon net zero by 2030 and in 2022 switched to 100% electrical energy supply from renewable sources. We will ensure that our demand-side drought actions reflect the reducing distribution input / WAFU over time in our revised draft plan.	More details on this can be found at: accelerate-net-zero Further details on our commitment to achieving net zero, including our route map timetable of when activities will be delivered is published at netzero
Installing more meters and smart metering and using this data to identify where intervention is needed seems eminently sensible and mirrors energy management. Devon County Council has carried out various water-saving measures over the years but lacks internal expertise to identify additional actions to proactively to reduce demand. This is compounded by the lack of a compelling business case given the poor payback on water-saving measures both financially and in carbon. Low-water gardening advice may be another area to explore, for example, giving away mulch and / or drought tolerant plants or sponsoring areas in the region's famous gardens.	Thank you for your support on water efficiency and demand management. We would like to work with the council to develop customer facing campaigns and initiatives to support both household customers, businesses and visitors to the region to reduce their water use.	Please see section 9.3 on Water Efficiency in our main Technical Summary for more information.
Using groundwater needs careful consideration as groundwater abstraction can adversely affect rivers and wetlands.	Thank you, we agree. For each of our supply options we have a requirement to undertake a SEA which considers the impact of the environment on the scheme including groundwater. This will determine whether a scheme can be progressed or not.	Please see Appendix 4 and 4.2
Recovering wastewater seems sensible given the energy that has already gone in to cleaning it. Will it help reduce incidents of untreated sewage	Recovering and recycling used wastewater will become more important through time as the impacts of climate change and the risks of drought and water shortages take place with more frequency across the South West. We	Please see section 7.5 on Supply Options, and section 9.3.1 on Promoting

discharge? Increasing the capacity of waste treatment centres must be a priority to reduce the shocking number of untreated sewage discharges.	will develop more water recycling proposals in future iterations of the WRMP. However, recycling of wastewater is only possible using treated effluent from wastewater treatment works. This will not prevent diluted sewage discharging from storm overflows during heavy rain fall events, as overflows are constructed as part of the sewer network to protect properties from sewer flooding before wastewater arrives at wastewater treatment works. In addition, we are also currently developing the scope of work for a wider programme of piloting in AMP8 (2025-30), looking at develop further opportunities to reduce demand for potable (drinking) water through re-use, rainwater harvesting and other non-potable water sources where appropriate. We have passed your comments on wastewater matters onto our colleagues who deal with these comments.	reuse and recycling of water in our main Technical Summary for more information on Water Reuse and recycling. More information on water recycling is available in our Drainage and Watewater Management Plan at: drainage-and-wastewater-management-plan
Using river water wisely is sensible within environmental limits imposed by the abstraction licenses to ensure the health of rivers and other wetlands. Balancing the flow of water seems sensible as long as additional connections between rivers and / or reservoirs do not affect existing hydrology and any opportunities for habitat creation / restoration are built in. Storing more water seems sensible given that one of the issues is more erratic rainfall. Any such schemes must obviously take other environmental issues into account.	Thank you, we agree. We are consulting and working closely with the EA and NE on the supply side options which are under consideration. For each of our supply options we have a requirement to undertake a SEA which considers the impact of the environment on the scheme including groundwater. This will determine whether a scheme can be progressed or not.	Please see Appendix 4.2
Whilst we accept the need for additional supply, we are concerned that there is a jump to highly engineered options before alternative options and the demand reduction measures have been tried. In particular, we are concerned that de-salination plants are being considered now. De-salination is an energy-intensive process with several potential negative environmental impacts such as raising salinity in the sea. It should be a last resort as stated in the West Country Draft Regional Water Resources Plan.	In light of the 2022 drought, we have accelerated the option for the Par desalination plant as an investment scheme during AMP7. In order to produce our WRMP24 we have undertaken modelling to determine our best value plan and this considers a range of information including cost, carbon and environmental impact. We have an ambitious commitment to be carbon net zero by 2030 and in 2022 switched to 100% electrical energy supply from renewable sources.	Our Net Zero plans are set out in the PR24 plan and detail on the carbon metrics scheme are in the WRMP in Appendix 4. More details on this can be found at: accelerate-net-zero Further details on our commitment to achieving net zero, including our route map timetable of when activities will be delivered is published at: netzero

We would be keen to explore how the County Council and relevant partnerships can continue to work more closely together. We welcome existing involvement in the DRIP project, which is exploring a range of approaches, including nature-based upstream interventions, to address localised flooding and the Local Nature Recovery Strategy. DCC is the lead authority for this strategy and we are very pleased to have SWW on board. There are a number of other areas where collaboration will be valuable. These include the Devon Carbon Plan, which sets clear priorities for de-carbonisation. We suggest it provides a useful framework of action, which the WRMP could allude to. DCC is a partner in Energy Saving Devon, which enables and encourages energy efficiency measures for households. It might be possible to integrate water efficiency advice with this service and incorporate campaign work around water conservation. In addition, the draft Adaptation Strategy is about to be published and again will be very useful for the chapter on adaptation.	WE believe our final plan is ambitious in its approach to reducing the harmful social and environmental impacts associated with the choices we make in meeting our customers' future water resource needs. For example, we will be reducing water abstraction from sensitive environments, fully mitigating any harmful short or long term impacts our investment has on the natural environment and seeking opportunities for reducing carbon emissions and protecting habitats that support carbon sequestration. Howeverr, in some cases, trade-offs between these objectives are required, as well as the need to consider the potential impacts on our customers' bills. To do this transparently, and in a way that provides the best possible outcomes for society, the environment and our customers, we have deployed a Best Value decision making framework that explicitly takes all these factors into account. In particular, compared to the traditional 'least cost' approach, this gives additional weight to the selection of options fto those that reduce water demand/usage, relative to those that generate additional supply. In justifying our water resource planning to stakeholders and regulators, it is helpful to be able to scale our ambitions against those of other organisations / groups in the region in relation to challenges such as the Climate Emergency. The Devon Carbon Plan and Adaptation Strategy will provide welcome support in this regard.	Please see section 3.5 on Customer and Stakeholder Engagement in our main Technical Summary for more details on our agrifood working group. For more detail on the Best Value Framework used, please see Appendix 6: Best Value Planning Approach and Methodology
DCC's Economy team runs the Future Farming Resilience project providing business support to farmers across a wide spectrum of issues. It might be possible to include sessions on water management and land-management changes. Building on the East Devon Catchment Focus Project with West Country Water Resources Group, further catchment-wide approaches could be developed to support and encourage changes to land-management, which can achieve multiple benefits. The introduction of ELMs makes this particularly timely and critical for farming communities and co-ordination will help reduce the number of callers.	We would be delighted to take part in future sessions to discuss resilience and catchment management with the farming clusters. We are currently establishing an agrifood sector working group under the auspices of the West Country Water Resources Group and the Ofwat Innovation Fund project, Water Net Gain, also begun in the Summer 2023. Both these initiatives could be of great interest to members of the DCC Farming Clusters.	Please see information in sections 7.4 on demand management options and 9: our demand management plan in our main Technical Summary. More information on the Water Net Gain project is available here: water-net-gain

ID Reference: 082	**Environment Agency**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Substantially change your plan. As a result of the changes the company has outlined in its plan, the changes the company has anecdotally told us about and the changes our representation requires, we assess the company will need to make substantial changes to its plan. We strongly recommend the company publish a new draft WRMP24 and run another consultation on it.	As a result of this feedback, we have taken the decision to consult on our updated plan again to enable stakeholders to comment on the changes that have been made.	Please see our revised Technical Summary and supporting Appendices. We will be holding a further consultation in October 2023.
Evidence your plan. As a result of the recommendations and improvements outlined in our response, we assess that the company has not provided sufficient evidence behind its plan. The company should provide greater evidence behind its WRMP.	As a result of this feedback, we have undertaken further work to provide more detail on our WRMP and we will be undertaking a further consultation.	Please see our revised Technical Summary and supporting Appendices. We will be holding a further consultation in October 2023.
In its draft WRMP, South West Water has forecast that it will achieve its demand targets set out in WRMP19 but has increased demand forecasts by 2% to account for changes in demand resulting from the COVID-19 pandemic. South West Water has historically failed to meet all PCC targets set out in WRMP19 and, in 2020/21, failed to achieve its leakage target. There has been an increasing demand trend in the South West Water area since 2013/14. In addition, PCC numbers presented in the WRMP planning tables for 21/22 do not align to the data submitted for its Annual Review. The company should take action to better understand the drivers behind its rising demand, demonstrate that it understands these drivers and that its baseline accounts for them. It should also demonstrate how its preferred plan will address these drivers. The company should review the starting baseline position for PCC and leakage in line with current identified challenges with the WRMP19 forecasts and update the baseline forecast, as necessary. If the company assesses that it is likely it will meet its WRMP19 targets, the company should provide quantifiable evidence in its WRMP24 on how it will get back on track. South West Water should identify whether any additional options are required to meet this updated baseline position. The company should update its tables to ensure they reflect data submitted during Annual Review.	Our revised plan baseline demand forecast is based on a 'plan' based scenario. We used local authority data to forecast future population and properties by water resource zone. This provides a higher population forecast and therefore higher demand than the draft baseline scenario, which was based on a trend based scenario derived from ONS data. The forecast is based on a 2019/20 base year and retains the 2% uplift to account for changes in demand following the COVID-19 pandemic. Since 2019/20 we have experienced three unusual years that have all impacted on the demand for water in our supply area. Both 2020/21 and 2021/22 resulted in high demand due to the impacts of the pandemic. In 2022/23 we experienced a drought and made appeals for customers to use less water and imposed a temporary use ban in parts of our region. We have assessed our baseline demand forecast against the annual report years and the 2019/20 base year is the most representative of the likely future demand we would see in our region. Combined with the impact of the plan-based population scenario we feel this is the most appropriate projection for our WRMP baseline.	Please see section 6: Our Supply-Demand baseline in our main Technical Summary and Appendix 3 for more information.

As a means to develop its adaptive plan, the company assessed a number of "higher demand scenarios. The highest of these is 'high high high' demand, which is a 6% increase on the company's 2022 drought. This scenario includes the risk of: · Failing to meet demand management targets · Higher rates of property and population growth · Switching of private supplies to mains water At the time of writing the company's year-to-date DI for 2023 is already 1.6% higher than 2022, but in February the year-to-date figure was 4.1% higher than 2022. The company have not demonstrated that 6% provides adequate cover for demand components. This is given the quantity of risk included in it and also as the company's demand for 2023 is already higher than 2022. Given the company's high demand in 2022, and the number of risk components, we assess that the high high high demand scenario does not adequately cover the risks. The company should reassess whether its high demand forecast is extreme enough. It should update its plan to ensure its scenario testing covers the full scale of likely demand scenarios.	We have seen reduced demand this year. We have reviewed our demand scenario testing on our plan and have detailed the outcomes of that scenario in our final submission.	Please see section 4.2.2: Demand forecasting scenarios and section 10.3: Adaptive Pathways in our main Technical Summary. Appendix 2 has more information on our demand scenarios.
Given the increasing demands seen in the South West Water area, the company has shown limited ambition toward water efficiency programmes in the early years of the plan. Chapter 11 sets out the programme to reduce PCC. The company has backloaded its water efficiency programmes as the benefits from smart metering decreases towards the end of the planning period, and this ensures a steady glide path. This, however, does involve stopping water efficiency services currently offered to customers, such as home visits, and reintroducing them later in its planning period. In addition, the options presented are not new or innovative and we have limited confidence on whether they would deliver the benefits outlined. Given this and the failure to meet demand targets, we do not have confidence in the deliverability of the programme. In our pre-consultation letter, sent June 2022, we suggested that South West Water could consider trialling innovative options on the Isles of Scilly. Given the 95% metering penetration it expects for the islands by 2025, it could provide them with crucial information on water efficiency activities, such as their success rates and actual achieved water savings, which it could use to inform future WRMPs. We recommend the company should: · Take a more ambitious approach towards reducing PCC and consider options which have a greater chance of success · Work closer with customers to promote options that will tackle the long-standing issues of high PCC · Consider bringing forward some of its customer side demand saving options. For example, its household water efficiency campaign (home visit) could be rolled out in conjunction with its smart metering programme · Consider innovative water efficiency activities that are robust and have a	We have reviewed all our water efficiency options and assumptions and have plans to continue studies and pilots in AMP8 to improve certainty on a wider range of innovative options. Some of the studies under consideration for development in AMP8 comprise: - Studies with the agri-food sector to develop options for non-potable water sources or supplies and other options to reduce demand - Options to retrofit rainwater harvesting - Working with developers to retrofit innovative water saving products - Working with retailers to develop smart apps, information, and incentives for implementing water-saving ideas. - Implementation of tariffs such as rising block and/or seasonal tariffs to inform water savings. We will be investigating a more diverse range of demand-options for consideration in WRMP29.	Appendix 5 sets out future trials as we work towards WRMP29, including tariffs. It is also referred to in section 9.3on Water Efficiency in our main Technical Summary.

greater chance of success · Review using Isles of Scilly to pilot programmes and collect information and data to inform future WRMPs		
In March 2023, South West Water was sent a letter from Minister Pow outlining an expectation that companies consider rapidly increasing the installation of smart meters. However, the company has not considered AMI metering for the Roadford zone. It is the only zone South West Water are not implementing an AMI metering programme in its preferred plan. In 2022, the company introduced Temporary Use Bans and applied for a Drought permit on Tamar Lakes and is again concerned about security of supply in 2023. In April 2023 it extended its Temporary Use Ban to the whole of Roadford zone, and is looking at what additional supply side measures it could implement. The company state that had demand been lower, it would not have needed the drought interventions. The Roadford zone was also the worst hit zone in South West Water area by the freeze thaw events in 2022/23. Therefore, the company should expand its AMI metering programme to include Roadford zone. The company could also explore accelerating its AMI meter replacement programme for all of its zones.	We have reviewed our metering options (focusing on AMI meter technology) for our revised plan. This includes non-household metering across the region and we have ensured clarity regarding metering options for our Roadford zone. We have made our plan clearer around which metering options have been selected in our preferred plan.	Please see the Technical Summary: sections on demand
In the preferred plan, the company does not select change of occupier metering as an option but has not justified why this option has not been selected. Change of occupier metering would aid the company in achieving maximum metering penetration quicker and support the drive to 110l/h/d. Metering on change of occupier has been shown to have a greater impact on demand reduction than optional metering. Metering is also a more certain means to reducing demand than other water efficiency programmes. The company should review the exclusion of change of occupier metering from its WRMP. If change of occupier metering is not selected in the plan, the company should justify the reasoning for this.	We have looked at selecting change of occupier as an option and have modelled COO at using a conservative 30% success rate in our resubmitted plan.	Refer to Appendix 5.1 for detailed assumptions for all feasible options.
The company forecasts a 3.5% reduction in non-household consumption by 2037/38 from 2019/20 levels. This does not fully deliver against the 9% reduction sought in the Environmental Improvement Plan in contribution to the water demand target. A greater level of reduction is expected in contribution to the Environment Act demand target. Further, the company does not consider a metering programme for non-households. The company should consider additional options, in collaboration with retailers, to reduce consumption including the assessment of smart metering for non-households. Where further reduction in non-household consumption is not considered possible this should be clearly justified.	We have reviewed our metering options, which includes an assessment of NHH metering choices. We have assessed our best value plan and these options in our revised plan.	Refer to Appendix 5.1 for details on the feasible NHH options. The Technical Summary has more information about our Demand Management plans.

Under the non-household activities planned by the company, South West Water includes a benefit of 0.48Ml/d from holiday rental water efficiency by 2050. Given the population of South West Water area increases significantly over the holiday season and the company regularly reiterates that tourism is driving high demand, tourism is severely underrepresented in the company's plan. We expect companies to understand their system and include options which address the bespoke issues for their region. In addition, with the increase of holiday bookings through non-traditional routes such as Air BnB, it is highly likely that not all holiday rentals will be non-household. It is unclear what the programme would actually entail. Chapter 8 says that this would be an engagement dashboard whereas Chapter 11 says it would be visits. The company should: · Consider additional options to reduce demand resulting from tourism and take learnings from the 2022/23 drought to inform deliverable options · Trial innovative strategies to reduce demand from tourism · Consider how it will reduce tourism demand from properties which are not non-household · Clarify what the holiday rental water efficiency programme entails.	We have already significantly reviewed and updated our water efficiency programmes and options. Our NHH scenarios comprise some that prioritise agriculture and tourism. We do not currently have a way of identifying HH properties that are classified as "tourism" but could develop an option to help identify and target these HH options through our water efficiency audits. Additionally, we could look at adjusting our HH water efficiency visits to target HH properties that could be identified as "tourism" and will consider developing innovative trials around incentives and tariffs for "tourism" properties.	Please see Appendix 2 on Demand Forecasting.
South West Water has seen an increasing demand for the last 10 years. The company needs to understand the drivers of this increase and then reverse this trend. There is significant uncertainty in managing customer demand, however, leakage management is within the company's control and a large reduction in leakage between 2020/21 and 2021/22 has been reported. Except for the reduction between 2020/21 and 2021/22, there has been an increasing trend of leakage for the Colliford zone. It has been above the WRMP19 forecast for the last three years. As the company can manage leakage, we assess more could be done in the short term to reduce leakage and therefore reduce overall demand. The company should accelerate its leakage programme and achieve greater reductions in the first 5 years of its plan.	Around 40,000 meters are being installed in the next two years (pre AMP8) in Colliford to support leakage management in AMP7. We have also assessed a wider range of leakage scenarios in combination with other demand-side options, to explore the costs and benefits of differing levels of leakage ambition.	Please see section 9.2 on leakage in our Technical Summary
In 2022/23, South West Water has implemented or is planning to implement a number of drought interventions. These have led to the need to review and update its WCDP as it has used drought interventions which should only be required to prevent level 4 restrictions and were not intended to be used until a much greater magnitude event. The draft WRMP states that this review and update will be done in the Autumn 2023 after the Final WRMP has been published, and we understand this has been delayed until Winter 2023. The WRMP needs to be aligned to the WCDP. It is unclear how the two plans will align. It is assumed that the WCDP will be updated to include the actions implemented in 2022/23, which are not currently in its WRMP. The WRMP should demonstrate that the company is resilient to droughts. In addition, the company has implemented actions before its WCDP drought trigger curves would normally trigger them and has continued to implement	We intend to update our drought plan after the updated WRMP has been published and will ensure any assumptions used are aligned and that this takes into considerations the learnings from the 2022 drought.	Appendix 9 sets out the lessons from the 2022 drought. The Drought Plan will be updated as soon as possible. This can be found at: drought-plan

drought actions after it has crossed back into drought zones which would normally see those actions stop. This means its drought trigger curves are not fit for purpose. The reservoir drought curves currently, do not take account of high demand. These recent high demands must be included by the company as part of a drought plan revision, but this will result in a misalignment with the draft WRMP24. The company will therefore need to review its drought curves to ensure they are appropriate and reflective of how the company would act in a drought. The company should update its WRMP to set out how it will ensure its plans will remain aligned, reflect anything it is certain will change and outline what it does expect to change in WCDP. The plan should be updated to demonstrate that the company is resilient to droughts. As part of its WCDP review, the company should look at its reservoir control curves and consider changing them to reflect its learning from 2022/23.		
In 2022/23, South West Water made plans to make a number of the drought permits it used in 2022 into permanent licences. Additionally, the company is looking to introduce desalination to increase DO in its Colliford zone by December 2023. As part of its justification for these licence changes and desalination, the company states it is required to ensure the long-term resilience of water supplies. However, the draft WRMP selects different supply side options. The plan should be updated to accurately reflect the options the company is seeking to implement in 2022/23. If these are licenced or the company is confident that they will be licenced at the time of statement of response, these should be included in its baseline. Otherwise, these options need to be included in the company's preferred plan. The company should also include in its plan how and when these sources will be used. For example, will they only be used in a drought or only during the summer.	The WRMP supply options begin from year 1 AMP8. Any AMP7 work was not included in the detail. Stannon Lake/Porth & Rialton options will make the temporary works permanent. The Restormel option in WRMP is linked to a number of other options to facilitate increased water requirements whereas the Drought Plan option is to increase the license and take additional water from the existing source. Blackpool Pit has 2 options in the WRMP: abstraction and pump to Restormel, and onsite treatment. Our revised draft WRMP includes details about how we are bridging the gap between AMP7 & 8 including which options have been accelerated into AMP7 and our position on drought options.	Please see Appendix 4
In the final plan, the company sets out that it will use all its drought interventions up to level 3 for a 1:500- year event. Additionally, the company require Emergency Drought Orders (level 4 intervention) in the first two years of the planning period for its Colliford zone. The WCDP sets out the following expected return periods for drought actions on the mainland: · Bournemouth and Colliford would not require level 1 drought actions until an event greater than 1:500- year · Wimbleball would not require level 2 drought actions until an event greater than 1:500-year · Roadford would not require level 3 drought actions until an event greater than 1:500-year As WRMP24 is forecast based on a 1:500 event, the plan is not in alignment with WCDP. This is as interventions beyond those outlined for a 1:500-year event are used in WRMP24. In addition, the increasing levels of intervention in the WCDP, would be implemented in increasingly extreme event. In other	We have refreshed our drought options by further considering the implementation costs, GHG emissions, water saved and wider societal benefits. As part of decision making, we have ensured that the use of our drought options is aligned with our drought plan or explained the reasons for any differences. We will look to ensure alignment between our Table 5, Table 3b and Table 6 in our revised WRMP, to provide consistent information on the use of our drought actions in use in our preferred plan.	Appendix 5 and 5.1 include detail on the assumptions for demand-side drought options.

words, level 3 events would be implemented in a much more extreme event than level 1. We would expect this to be reflected in the WRMP. It is not clear why actions up to and including level 3 are needed. The company should ensure frequency of drought interventions in its WRMP are clear and not mislead regulators or customers.		
It is unclear whether implementing a Temporary Use Ban (TUB) in summer 2022 was in line with stated frequency of occurrence in the context of historic implementation. Upper Tamar Lakes drought permit implemented in autumn 2022 is not included within the draft WRMP24 so not in line with stated levels of service. The company is on track with supply against forecast but are experiencing higher demand with an increased call on drought measures. The company should include information within the final WRMP24 evidencing actual versus planned level of service e.g., TUBs frequency as not clear in draft WRMP24.	We have investigated the methods of calculating actual levels of service within our modelling framework and have included an assessment of this in our final WRMP.	This can be found in Appendix 2: section 8.4, table 2f.
The company's methodology for forecasting its supplies does not appear to be a system response approach. A system response approach is the only approach which can adequately capture aspects such as system constraints, conjunctive use capability and operational response (this is outlined in the 1:500 water resource planning guidance supplementary guidance). Given South West Water has a complex conjunctive use system, it is not clear why it has not used system response metrics. The company should either outline that it has used system response metrics, or it should review its modelling approach. The company should look to use system response modelling. If the company does not change its method, it should justify why the approach it has taken is appropriate and how it has mitigated short comings in its modelling.	We have noted your comment. However, this will require a whole new suite of models to be developed so we will not be able to complete this in time for WRMP24. We commit to developing our modelling capacity for the WRMP29 and will include information in our WRMP24 to show how we will do this.	Please see Appendix 1
The company has used the UKWIR "Source Yield Handbook" (2014) to forecast its DO from its groundwater sources. The plan states that previous WRMPs have shown groundwater sources are "generally resilient to drought". It does not appear that the company has reviewed this assumption in light of the move to 1:500 resilience. The company also has not provided evidence of the analysis work which shows this. Additionally, the company does not appear to have looked at how sources respond to drought on the Isles of Scilly. The company should review its groundwater DO modelling and DO modelling for the Isles of Scilly. It should assess whether the move to 1:500 resilience has an impact on the DO from groundwater sources.	We have plans to review the long-term groundwater yield on the Isles of Scilly and will look at what the respective DO might be on each of the five islands. However, we are currently behind schedule on this work. We will review learning from ongoing groundwater studies on the Isles of Scilly to understand whether moving to 1:500 year resilience will have an impact on DO from groundwater sources.	Please see Appendix 1
The company has shown that it considers Roadford and Colliford to have a critical drought duration of 18-months and Wimbleball to have a critical drought duration of 12- months. The WMP shows the company plans to look at droughts with durations that are different from its critical drought duration	We are improving our modelling capability to enable us to undertake this for WRMP29.	Please see section 11.4: Our roadmap to WRMP29 for more information on our

analysis. Given that 2022 was a shorter duration than this, we strongly encourage the company to do this for its statement of response. We also strongly encourage it to look at longer duration events. Additionally, the company consider its 18-month drought duration to commence in April. It is not clear how the company have considered alternative start months and the impact this may have on the critical drought duration. The company should look at a wider range of drought durations. It should learn from 2022 and consider shorter sharper events and also look at longer drought events. It should consider alternative start months and identify the impact of this on its critical drought duration. The company could also consider looking at drought events which are greater than 1:500.		plans to improve our models.
In March 2023, water companies were sent an updated version of the WRMP planning guidance. This guidance set out that companies needed to review resilience in the context of the 2022 drought in their WRMP's. The drought of 2022 challenged most companies and was one of the most significant droughts of recent times. The drought saw very high demands and highlighted some areas where resilience needs to be improved. South West Water should update its plan to integrate the new information outlined in the WRMP planning guidance.	We have reviewed the updated WRMP guidance and have now integrated the new information into our plan. This sets out what we have learnt during the 2022-23 drought and how we have adjusted our plan in response to the changed guidelines in relation to drought. We have also reviewed our supply and demand-side drought actions and included updated information as part of our WRMP (within our WRMP options tables).	Please see Appendix 4
In its 2022 Drought Chapter, South West Water states, "the combination of pressures resulted in a situation beyond the currently applicable regulatory planning design requirement of 1:200" and "Importantly we note that we continued supply to our customers through greater than a 1 in 200-year design condition without resorting to "Drought Level 3" (e.g., Non-Essential Use Bans) or "Drought Level 4" (e.g., standpipes and rota cuts) actions, consistent with our existing levels of service". This is misleading as it reads as if the 2022 drought was greater than 1:200 and therefore the company acted in line with its plans. This was not the case as the company states "The associated rainfall return periods suggest the event was as extreme as a 1 in 20-year event in Colliford and Bournemouth, and as/more extreme than a 1 in 30-year event in Roadford and Wimbleball." Reporting the event as beyond a 1:200-year event therefore creates an overly optimistic report of the event. Should the event have been a 1:200 event the company may have needed to resort to level 3 and level 4 measures. In addition, whilst the company did not implement level 3 actions it did approach Defra about doing so. It also implemented a number of its 'more before 4' actions which should come after its level 3 actions. This is not reflected in the report. The company should update its plan to ensure it is clear that the 2022 event was not a 1:200-year event. It should rephrase the section to ensure it is clear that it did act outside of its plan and did implement measures on an event of lesser magnitude than it planned for. It should reflect that whilst it did	Thank you for highlighting this, we have addressed this comment and it will be updated in the revised dWRMP24.	Appendix 9 has now been updated to remove this potentially misleading comment.

not implement level 3 actions it did consider it and it did implement actions it would normally do after level 3 actions.		
Chapter 1 sets out the actions that the company undertook in the 2022 drought. However, the company does not include the Tamar Lake drought permit so the chapter should be updated to ensure it accurately reports on the 2022 drought.	Thank you for highlighting this, we have addressed this comment and updated the information.	Please see Appendix 9
The company sets out its approach to DO modelling in Chapter 5 App 5.2. As part of this the company sets out that to calculate DO for Bournemouth it used WRMP14 hindcast flows to determine historic worst-case droughts. However, the company have not provided information on how it has completed this hindcast analysis. The company should provide a methodology on how it has completed the hindcast datasets.	Hindcast data was not used in WRMP19 but we offer a discussion with the Environment Agency so we can clarify this position.	Our Baseline Deployable Output (DO) is discussed in section 5.3 in our main Technical Summary. See Section 2.5: Drought Vulnerabilty assessment, section 2.6: Levels of Resilience and Appendix 1: Supply Forecast for more information on our approach to Drought Resilience.
South West Water's planning tables show the use of drought measures remains consistent over time. The expected costs of using a drought permit restriction is based on the value customers place on avoiding environmental stress associated with drought permits. The costs does not reflect the potential environmental impact. Section 4.7 of the WRMP Guidance states that "increased resilience in the medium and longer term should not rely on the increased use of drought measures to boost supplies", and "should plan, where appropriate, to use drought permits and orders less frequently in future, particularly in sensitive areas". The company has not demonstrated that it has applied its understanding of environmental risk to inform its planned frequency of use. The company needs to provide further evidence / clarification that the expected frequency of drought permits is going to decrease with the Best Value Plan. It should demonstrate that the use of drought permits is in the best interest of its customers and the environment.	We will ensure that our drought actions reflect the reducing distribution input / WAFU over time in our revised draft plan.	Table 5 for demand-side drought options selected in our preferred plan. Table 6 has been updated to and reflects the benefit as DI reduces

The Upper Tamar Lakes drought permit is not included within the draft WRMP24 within Table 6 'Drought plan links'. There may be additional permits (for example, Lyd permit to pump store up to Roadford) and other licence variations which are now being considered since submission of the draft WRMP24 which have not yet been included. The final WRMP24 should incorporate abstraction licence changes and/or drought permits which are reflective of the current situation.	We have updated this information and it is reflected in the revised draft WRMP24.	Please see Appendices 4, 4.1 and 4.3
The supply options presented in the plan do not appear to be sustainable from the information presented and our understanding of the catchments. This is as they are in catchments where further abstraction would cause a risk of deterioration. They also do not seem to be aligned to the company's WINEP. The adaptive pathways do not recognise that there is uncertainty regarding these best value options sufficiently and therefore do not promote sufficient options in the adaptive pathway. The overall list of supply options presented needs a full review in terms of the sustainability of the abstractions proposed. The company needs to review the supply options presented in its plan against its WINEP investigations and assess the uncertainty of water availability for each. Where an option may be impacted as a result of a WINEP investigation, this should be clarified in the plan. The company should ensure its adaptive pathway captures the risk of supply side options not delivering the benefits expected.	We have issued the WINEP investigations details to EnviroWater, an industry expert SWW enlisted to help with understanding the complexities and cost of licensing for each of the supply options (where required). EnviroWater has adjusted the costs and timeframe accordingly and this is reflected in the table 5a in terms of start dates. It is difficult at this stage to determine if the WINEP investigations will drastically alter the WRMP scopes prior to their completion, and as such, the WRMP options remain unchanged. COL15 made assumptions of work being delivered under WINEP that we have confirmed with the WINEP delivery team. We have not had an update of WAFU/DO values since initial workshop in 21/22.	Please see Appendix 4
South West Water has outlined that one of its options is to build a new raw water intake on the lower river Camel. This has a benefit of 5Ml/d. We have significant concerns with this D9 option as river Camel SAC extends all the way down the river to just upstream of Wadebridge. CSMG flow targets also apply to the river Camel. In addition, the new intake would require infrastructure (weir) which would be required to facilitate the abstraction. River Camel Restoration Plan is aiming to remove barriers from the catchment. South West Water needs to undertake detailed modelling for this option. We also need to have further discussions with the company to understand its acceptability. The company also need to consider the infrastructure (weir) which would be required to facilitate the abstraction and how this fits in with the River Camel Restoration Plan.	We acknowledge your concerns about this supply option and have reviewed all of our supply options. We are keen to meet with you to discuss the specific aspects you have raised about it.	Please see Appendix 4
In its plan, the company has included option COL11, which is turning an existing Hawk's Tor Pit quarry into a reservoir. This option is in the Fowey catchment which is on PR24 WINEP for investigation. The company should review the uncertainty associated with this option and hold further discussions with us on it. The plan should be updated to reflect the uncertainty.	We have reviewed the uncertainty associated with this option and had further discussions with you about this. Our revised plan has been updated to reflect the results of these discussions and the uncertainty around this option will be clearly reflected.	Please see Appendix 4

The COL15 option is for the company to increase the capacity of its Restormel WTW by 5Ml/d. This would involve the company increasing its abstraction licence by 10 or 20 Ml/d depending on further studies. The existing Restormel licence is the focus of a PR24 WINEP investigation. The company should review the uncertainty associated with this option and hold further discussions with us on it. The plan should be updated to reflect the uncertainty.	We have assessed the impact of the option and the timeframe for licensing of this option has been updated by 1 year with respect to the WINEP investigation. This will alter the operational start year for the option, and potentially, alter whether or not the option is included in the revised plan.	Please see Appendix 4
In its plan South West Water say that it revoked its licence for Boswyn stream/ Cargenwen Reservoir/ Carwynnen stream. The company states that additional environmental assessment is required to identify if there is a sustainable way to use this source. The plan indicates that South West Water would need a new licence but that it is a drought option and would operate as a drought permit. It is therefore unclear whether this option is for a new licence or whether it would only be a drought permit. The company should clarify whether this option is a licence or a permit.	All three sites had abstraction licenses, but we need to understand if the licenses still exist. We will clarify what type of license was previously granted and work with EnviroWater to conduct a licensing assessment.	Please see Appendix 4
Under its adaptive pathway for Colliford, the company has selected Leswidden pool. This option is a 2.5Ml/d raw water transfer from Leswidden pool to Drift reservoir. Geographically, Leswidden pool is in the far west of the WRZ so to use this compensate for licence variations for Park and Stannon not being delivered in 2023 would not appear to make sense as it is far away from Colliford Reservoir and would not support refill into Colliford Reservoir. The company should update its plan to ensure it is clear on how its adaptive pathway mitigates the risk of its preferred plan.	We acknowledge your concerns about this supply option and have updated the revised draft WRMP24 to address the issue raised.	Please see Appendix 6
We have significant concerns with a number of the options identified by the company and do not think the company has sufficient supply side options in its plan. The company should identify alternative supply side options to include within in its plan. The company should work with the Environment Agency when developing these options and ensure early engagement. This will reduce the risk of unacceptable options being featured in the plan.	We understand your concerns relating to the number of supply options included in the draft WRMP24. We have, through collaboration with the EA, encompassed a broader suite of options in our revised draft plan.	Please see Appendix 4
Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) require protected sites that are in unfavourable condition to have solutions implemented “as soon as practicable”. We interpret this to mean implementation works should begin in the AMP period following completion of an investigation. However, the plan has not demonstrated that this requirement will be met for the River Avon SAC. The plan indicates delivery will be from 2030-2045 but this timing is not explained and therefore the plan cannot be considered to have justified delivery of the solutions being pushed back to the later part of the planning period. The adaptive plan for Bournemouth includes a preparation and monitoring phase. The wording implies that further investigations are required into the scale of the change required before the company begins implementing a solution for the River	Thank you for these comments. Once further investigations are completed, we will ensure the findings will be reflected in an update of the HRA to account for any identified likely significant effects, which will subsequently feed into the SEA assessments of the options.	Please see Appendix 7 for our Strategic Environmental Assessment.

Avon SAC. Our interpretation of the information in the plan is that this adaptive approach would not meet the requirements of the habitats regulations because it appears to introduce around 5 years of delay before implementation works begin. The plan refers to the abstraction reductions for the River Avon SAC as "suggested as required". This mischaracterises the status of these abstraction reductions which we would describe as confirmed. We do not agree that these reductions require further scrutiny due to the length of river benefitting because these reductions are not subject to cost benefit or affordability tests under the Habitats Regulations. These abstraction reductions are legally binding and should have been included in the core pathway. The company must demonstrate that the WRMP will deliver the requirements of the Conservation of Habitats and Species Regulations 2017 by planning to reduce abstraction to meet the requirements as soon as practicable. The timings of solutions should be optimised to ensure delivery of these requirements is not delayed, and any works that facilitate achievement of these requirements are completed on the quickest technically feasible timescale. The final plan should clearly state which solutions will contribute to resolving the impact on the Avon SAC. This should include demonstrating that timings of SROs are planned to meet the above requirements as soon as practicable. The plan must demonstrate that the adaptive approach for Bournemouth, including additional monitoring and adaptive planning decision points, does not introduce a delay in implementation of solutions for the River Avon SAC. Further investigative work should be targeted at delivering the best solutions for the River Avon SAC.		
Show that your plan meets requirements for protected areas, particularly the river Hampshire Avon SAC. The company does not provide clear evidence that plan meets relevant local growth, including new developments, in the Bournemouth area without increasing, or delaying action to reduce abstractions that may adversely impact the Hampshire Avon SAC. The plan narrative and Bournemouth data does not show that the Hampshire Avon SAC will not see an increase in abstraction that potentially has an adverse effect on site integrity. Furthermore, it cannot be ascertained that local growth is not being supplied in preference to reducing abstractions sooner, which may potentially impact the Hampshire Avon SAC. The company needs to Include an assessment showing the local growth in demand in areas supplied by Hampshire Avon abstractions, alongside evidence that abstraction will remain at recent actual levels and will reduce as soon as practicable. The company should also provide information on how local growth will be supplied including any new supply options and demand reductions. Interim measures and demand reductions should be outlined that minimise impacts on the SAC while abstractions that potentially impact the site persist.	Additional local growth information has been collected and used to inform the options for the Hampshire Avon SAC. As above, once further investigations have been completed, the findings will be reflected in an update of the HRA to account for any identified likely significant effects, which subsequently feed into the SEA assessments of the options.	Please see Appendix 7 for our Strategic Environmental Assessment.

Abstraction reduction figures are lower than Environment Agency expectations in some areas and the assessment may not have included the best available information. We have noted lower than expected reductions planned for the Wimbleball and Colliford WRZs. The Map in section 3, page 9 includes catchment by catchment deficit or surplus figures. Some catchments have figures that are different to Environment Agency expectations and in some cases inconsistent with Environment Agency advice provided to the company. Catchments of note are: · Exe · Tavy · Fowey · Stour For some catchments (for example, the Tamar), the company should consider deficits at higher flows rather than just Q95. Revise BAU+ and Enhanced Scenario figures in line with Environment Agency area advice.	We are working to bring the information together but are facing time constraints. However, we have clarified the position with regard to the Environmental Destination and license capping assumptions in the revised WRMP24 and have demonstrated how this aligns with the AMP8 WINEP.	Please see section 5.4: Our role in achieving sustainable abstraction in the Technical Summary for more information.
South West Water was provided with a list of licences in June 2022 where, in accordance with the WRMP24 guidance on licence capping to prevent deterioration, it was advised not to plan to increase abstraction until investigations had been completed. It is not clear in the plan if this has been taken into account. The licences on the Exe were missing from this list in June 2022 but have since been highlighted as a risk to South West Water. If WINEP investigations show a risk of deterioration, licences may need to be capped as early as 2027. Ensure the final plan includes limiting abstraction to prevent deterioration for all rivers and protected areas. Technical work is ongoing between the Environment Agency and the company to ensure that abstraction does not cause a deterioration to protected sites or WFD waterbodies. The final plan must clearly explain how deterioration will be prevented The company should update line 7.3BL of the tables to include volumes of water for sites there is a risk of deterioration, but at present the outcome is uncertain.	We have engaged with the EA to ensure we have and are using up to date license information for the investigations. We acknowledge your concerns regarding the potential requirements for an early license capping.	Please see section 5.4: Our role in achieving sustainable abstraction in the Technical Summary for more information.
Insufficient detail is provided on the timings to explain the approach taken to address flow deficits and demonstrate that the plan meets regulatory requirements. The company must explain the timings of abstraction reductions under the Environmental Destination to demonstrate that the plan meets the requirements of the Water Environment Regulations 2017. If any changes are not planned as quickly as technically feasible, the company will need to justify why abstraction reductions cannot be delivered sooner. The company should also review and explain the prioritisation of catchments to ensure the maximum benefit is gained from the earlier interventions. For example, the river Dart is a Salmon River. Additionally, the river Swincombe flows are already below EFI due to the Swincombe abstraction recent actual	We have noted the requirements to reduce abstractions as soon as possible and have clarified our accelerated timescale in the revised WRMP. However, there are a range of issues to take into account such as the availability of alternative sources, deliverability and affordability which will add to the complexity of our decision-making.	Please see section 5.4: Our role in achieving sustainable abstraction in the Technical Summary for more information.

and fully licensed abstraction rates. Earlier delivery should be fully considered in the plan.		
In the planning tables, the company sets out its known and potential sustainability reductions. However, the company has not set out in its WRMP what these figures relate to. It is exceptionally difficult to trace where the reductions have come from and also to assess if sustainability reductions we were expecting have been adequately captured by the plan. Additionally, it appears that some of the sustainability reductions for the Bournemouth zone have been incorrectly included in the DO loss from Climate change row. The company should set out in its WRMP the sustainability reductions it has included in the plan and show how these numbers have been fed into the WRMP planning tables. The company should ensure the sustainability reduction have been captured by the correct row in the planning tables.	We have clarifed this in our revised WRMP and ensured our planning tables are accurate.	Please see our published data tables
At the time South West Water drafted its WRMP, PR24 WINEP was, and still is, being finalised. As a result, the plan currently does not reflect the company's final PR24 WINEP. South West Water should update its plan to reflect its PR24 WINEP programmes.	The updated plan reflects our latest AMP8 WINEP plan including no deterioration investigations.	Please see Section 9 of the Technical Summary
South West Water outlines that it has considered PR19 WINEP investigations when forecasting DO. The company state that at present this only includes De Lank in the Colliford zone. The sustainability reductions of 4 Ml/d to restore the recent actual deficit on the Lower River Otter from the Otter valley groundwater sources is not included. It is included on the PR24 WINEP and is to be delivered through licence changes and stream support changes, although the actual details have not yet been agreed. These licences will also need to be capped to prevent future deterioration against WFD (which is an additional 9 Ml/d). The Otter licence capping should be on the PR24 WINEP for 31/03/26 and the sustainability reduction for 31/03/30. Additionally, The PR24 WINEP date for the Camel licence changes is 31/03/30which is later than the 2028 quoted in Chapter 5. The company should review its WRMP and check that is accurately reflects the information it has entered for its PR24 WINEP programme. The company should also ensure it reflects the outcomes from its PR19 WINEP investigations. Ensure the final plan includes the sustainability reductions required for the Otter valley.	We have clarified this in our revised WRMP and ensured our planning tables are accurate.	Our Baseline Deployable Output (DO) is discussed in section 5.3 in our main Technical Summary. Please see section 5.4: Our role in achieving sustainable abstraction for more information on sustainability abstraction reductions and WINEP
WCWR companies have been asked to revisit the inclusion of Cheddar 2 in their WRMPs, in order to be consistent with the Regional Plan and SRO gate 2 submission. Should Cheddar 2 be included in the plans, a HRA would be required. South West Water should work with Wessex Water and Bristol Water to collaboratively produce a HRA covering Cheddar 2.	We are collaborating with the neighbouring SRO teams to ensure are doing this consistently.	Please see Appendix 4. Further information is on the WCWRG website:

		https://www.wcwrg.org
In its Environment Chapter, South West Water outline that Hands-Off Flows may need to be lowered in the future. The company state this may happen as flows change, the same EFI (as a proportion of the available resource) would mean less water for ecology and abstraction, and that even if a Hands-Off Flow for an abstraction has been set appropriately to protect the EFI now, it may need to be lowered if flows fall in the future. This is incorrect. At present there is no suggestion that the Environment Agency would decrease Hands-Off Flows on existing abstraction licences in the future. South West Water should update its plan to ensure information in it is accurate.	Thank you for this feedback – these statements have been corrected in the revised draft WRMP24.	Please see revised text in section 5.4: Our role in achieving sustainable abstraction.
The need to manage spatial rainfall difference across the WRZ would suggest that the WRZ customers do not share the same drought risk. This concern is supported by the large number of transfer options included in the SWW plan. SWW should review their WRZ boundaries considering the weakness identified by the transfer options contained within their plan.	Whilst rainfall does vary spatially across our WRZs we have appropriately sized local storage which we utilise to meet demand which also varies spatially in each WRZ. Our WRZ strategic reservoirs provide the backup to these local resources which support each WRZ during drought and means customers in each of our WRZs experience the level of risk linked to the resource available in each strategic reservoir. The large number of transfer options is to ensure we can continue to provide the same level of resilience in the future and is in part driven by local reductions in available resource due to Environmental Destination and the need to ensure sustainable abstraction. An explanation and justification for this has been fully set out in our revised dWRMP24.	Please see Appendix 1
South West Water outlines that it has five water resource zones. We are concerned about the integrity of the Roadford zone. This is as the company had issues moving water to the north of the zone during dry weather periods in 2018 and 2022. In 2018, the company struggled to identify available supplies when its Wistlandpound reservoir had water quality issues. In 2022 SWW required a Temporary Use Ban (TUB) and Upper Tamar Lakes drought permit to be implemented in the north of the Roadford water resource zone, plus tankering to 11000 customers, due to increased risk in comparison to the rest of the zone. Without the drought permit, 3000 customers could have been subject to level 4 drought measures. The company states that it has improved its distribution system in response to the 2022 drought which restored it as a single water resource zone. However, the company has not demonstrated that 2Ml/d would be sufficient to state this. Additionally, the company is also considering additional connectivity of its zone. It is unclear why this is required if it truly has a single water resource zone. Finally, the company has not outlined how it addressed the issued caused by Wistland pound reservoir in 2018. As a result of the above, we do not have confidence in South West Water's Roadford zone being a single water resource zone. The company should confirm the WRZ integrity guidance minimum threshold applies to the Northern region of the Roadford WRZ as this appears to be a region with	Northcombe WTW is supplied by Roadford reservoir and provides year round resource (up to 50 Ml/d) to the northern section of the Roadford WRZ. Changes to network infrastructure in the north west of our Roadford WRZ means we can now move more of this water into the Upper Tamar area from Northcombe WTW to meet local demand in this area in addition to the local resource in Upper Tamar Lake. We continually review our network and our ability to meet local demands. The options which provide improvements to WRZ connectivity are to ensure we maintain the integrity of the WRZ in the future most notably as we reduce local abstraction to meet Environmental Destination and ensure sustainable abstraction. The resilience schemes on the River Lyd and Tamar at Gatherley, which pump additional water to Roadford, ensure that we have a resilient strategic storage and the connectivity options then allow us to move this resource to the areas in our WRZ where we expect to see reduced local supplies and/or increased local demands. This explanation and justification is fully set out in our revised draft WRMP.	Please see Appendix 6

limited connectivity to the main WRZ network. The company needs to provide the results of its scenario modelling work to quantify the impact of new resilience sub-zonal interconnector options (being investigated for PR24) improving connectivity/ conjunctive use and drought resilience in the zone.		
The Regional Plan was not submitted on time. The company must collaborate with Bristol Water and Wessex Water to ensure prompt delivery of future plans and planning tables. The company must also ensure that its WRMP explains how it has reflected the Regional Plan.	We are fully committed to the WCWRG and the Regional Plan and are currently working to increase our input through the contribution of dedicated resources and expertise to support the work of the Group. This will ensure that we achieve closer alignment with the other WRMPs and full integration of our WRMP with the over-arching Regional Plan and the regional Strategic Resource Options.	Please see Section 3.4 of the Technical Summary. More information on our partnership working through the WCWRG is available on their website: https://www.wcwrg.org/about-us/
The SRO Cheddar 2 is included in the company's feasible list and is in its adaptive plan. There is no explanation why this option has not been selected for the preferred plan. Cheddar 2 is not selected in Bristol Water or Wessex Water's WRMP for their preferred or adaptive plans. The company must liaise with WCWR and the Pennon Group regarding the Cheddar 2 option and align its WRMP24 with Bristol Water and South West Water's WRMP24, WCWR's Regional Plan, and the SRO Gate 2 documents.	We have recently taken full ownership of Cheddar 2 schemes.	Please see Appendix 4 and Appendix 6.
Mendip Reservoir is inconsistent with the dates in Wessex Water's plan. The company plan selects this option under its preferred programme from 2043 but this does not align with Wessex Water's plan, which outlines the option would be needed: · In its 'high needs' pathway from 2049, · In its alternative pathway from 2030-2035 planning period with a 22-year lead in time · And from 2071 in the planning tables We expect the company to ensure that all dates are consistent, and all dates are aligned.	We are working closely with the Regional Planning Group and Wessex Water to ensure that our plans are aligned at resubmission.	Please see Appendix 4 and Apendix 6. More information about our joint working arrangements with the WCWRG is available at their website
In its WRMP, South West Water set out the benefits for Poole Harbour, Mendips quarry, Longham and Christchurch WWTW. However, the benefits presented in the WRMP tables differ to the benefits outlined in the Regional Plan tables and the WRMP. We sought clarification on this from South West Water and it said that this is as the Regional Plan tables and the narrative are DYCP figures and the figures in the WRMP tables are DYAA. The SROs for the zone (Poole Harbour and Mendip Quarry) are to be shared between South West Water and Wessex Water. The explanation for the difference between the WRMP planning tables and the Regional Plan and WRMP narrative still does not explain the benefits outlines. This is as the DYAA DO benefits South	We are working closely with the Regional Planning Group and Wessex Water to ensure that our plans are aligned at resubmission.	Please see Appendix 4 and Appendix 6. More information on our partnership working through the WCWRG is available on their website

West Water are claiming are less than 50% of the DYAA DO for these schemes as a whole. South West Water should provide justification on why its figures differ to the figures presented in the Regional Plan. The company's WRMP should be aligned to the Regional Plan. Linked to this, South West Water should ensure it uses consistent scenarios to report options benefit. This should be DYAA, but the company should also present DYCP benefits as well.		
The company's plan only considers the next 25-years while other WRMPs have considered up to at least 60 years. WRMP Guidance suggests it may be appropriate, depending on the challenges and risks in the relevant regional plans to plan for the next 50 years. Other companies in the region have considered up to at least 60 years. Regional planning guidance suggests planning for longer than 25 years. We suggest the company develop a longer-term plan, or include a discussion around the water supply/demand issues post 2050, to be consistent with regional planning and other water companies within the region, or the company should explain why it has only developed a plan for 25 years.	We will consider this for the next iteration of the WRMP in 2029.	Section 10 of the Technical Summary outlines what we intend to improve for our WRMP29
As part of its WRMP, South West Water have not produced any programmes for the Isles of Scilly. The company state that this is because it has a healthy surplus. The company will review this when it has an improved understanding of its AMP8 supply position in early 2023. Section 8 of the WRMP planning guidance states that companies should identify options to "address government expectations, concerns of your customers or local stakeholders and to ensure the efficient use of water". The guidance also outlines that companies should use options to produce a best value plan, which is economical and "increases the overall benefit to customers, the wider environment and overall society". As South West Water have not produced any plans for the Isles, it cannot demonstrate that its lack of programmes is truly the best value nor that it ensures the efficient use of water. Additionally, it is unclear whether South West Water have considered its customers views when deciding not to produce a preferred plan. Linked with improvement 12.1, the company should produce three plans for the isles: · Least cost · Best value · Best for the environment and society	We have included a least-cost, best value and best for environment and society plan for the Isles of Scilly to meet the guidance.	For more information, please see Appendix 6: Best Value Planning Approach and Methodology
The chapter on the Isles of Scilly assumes that the abstraction licences will be renewed in 2030. On St Marys there are vulnerable, wetland SSSIs which are potentially impacted by the abstractions and the licences include monitoring conditions to provide evidence to consider if the renewal should be on same terms. There is no guarantee that the licences will be renewed on same terms, especially with the lack of data available before South West Water took over the abstractions. It is unclear how South West Water have managed this risk	The AMP7 Water Quality Programme, which is likely to use a combination of brackish and/ or sea water desalination, should provide a surplus supply-demand balance for the planning horizon, for all futures. This revised S-D balance is being finalised and confirmed.	Please see section 6: Our supply demand baseline in our Technical Summary and Appendix 3 for the revised S-D balance

in its plan. In addition to the Isles of Scilly not having a preferred plan, it also does not have an adaptive plan. The company have set out in its plan that it does not currently have all of the information and data to be able to produce a supply demand forecast it can be confident with. This means that there is significant uncertainty with the future forecast and plan. When drafting a preferred plan for the Isles of Scilly, the company should consider including an adaptive plan which accounts for the risk presented by its preferred when. This should demonstrate that the company has a clear strategy for if things do not go according to plan. This adaptive plan should address any issues caused by any licence reductions which may occur at licence renewal in 2030.	We are considering the risk associated with existing license renewals as part of this S-D baseline. This will enable us to confirm the need for a full adaptive plan for the islands, based on an updated problem characterisation.	Futher information is provided in Appendix 12: Problem Characterisation
South West Water have provided one adaptive pathway for each of its WRZ, except Isles of Scilly. All of the risk beyond that allowed for in the company's headroom is therefore absorbed by a single adaptive pathway for each zone. This risk is from population growth, demand side action benefits, water efficiency policy, Environmental Destination, climate change, SROs and local supply side actions. It is not clear how the adaptive pathways presented can cope with the risk from all these things. The company should update its plan to demonstrate that the adaptive plan covers all the risk in excess of its preferred plans headroom. The company should consider looking at more than one adaptive pathway so it could ramp up the level of activity should it need too.	We are in the process of understanding the Supply Demand balance in all futures and more extreme scenarios. We will ensure we develop an appropriate plan, with adaptive pathways as required, to demonstrate we have a robust plan.	Please see section 10 - Our Water Supply Plan in our Technical Summary for details of our adaptive pathway.
In the adaptive plan the company outlines supply side actions which it could implement. However, these actions are not definitive. The company has indicated that it would potentially look to use other supply actions or would need to identify alternative actions. The company should review its adaptive plan to ensure it has well-defined set actions. It should demonstrate that the adaptive plan has a sufficient lead in time for the actions it would look to do. Overall, the company should provide its customers confidence that it has an adaptive plan that they can be confident is implementable and ensures a secure supply of water.	A fully adaptive plan, with a core pathway and suitably timed decision and trigger points to determine alternative actions has been provided as part of our revised WRMP. This has been based on comprehensive scenario testing using the Best Value framework, taking account of future uncertainty factors and realistic project development and lead-in times.	Please see section 10 - Our Water Supply Plan in our Technical Summary for details of our adaptive pathway.
Under Green Recovery, South West Water were funded for a new pumped storage scheme for Roadford reservoir. This was a new abstraction point on the river Tamar at Gatherley. Unfortunately, the infrastructure present means the company cannot take the volume of water it thought it could. The Gatherley 2 option in the plan would enable the company to access all of the water originally planned. As the new intake has been funded it is unclear why the company have only selected Gatherley 2 under its adaptive pathway. The company should update its plan and justify why it has not selected Gatherley 2 under its preferred programme.	The cost turned out to be significantly higher than was initially predicted in our green recovery funding proposal. We will be delivering a Gatherly phase 1 scheme which will provide additional benefits in terms of low impact development. The cost of phase 1 alone is in excess of the predicted cost for the entire scheme as presented in the green recovery programme.	More information is found in Appendix 6: section 10.4.3

The plan does not contain information on how the company expects the annual risk that it may need to impose prohibitions or restrictions on its Isles of Scilly customers under each of those provisions to change over the course of the planning period. Therefore, the company has failed this direction. In addition, this means the company does not demonstrate that it will achieve 1:500 resilience on the islands by 2039. The company must clearly state how it expects the annual risk of imposing prohibitions or restrictions for its Isles of Scilly customers to change over the course of the planning period. The company should demonstrate it will achieve 1:500 resilience for the Isles by 2039.	We developed further information to provide additional details on how relilience affects the risk of restrictions for the Isles of Scilly. We are additionally considering methods to quantify future risk.	More information is found in Appendix 6: section 3.1.3
The plan does not contain the methodology or assumptions in relation to the risk of temporary use restrictions, drought orders and emergency drought orders. It also has not outlined the approach it has adopted to show it can meet the frequency that the company has stated in its plan. Therefore, the company has failed this direction. In addition, the company does not present the company's actual levels of service. The company must provide the methodology and assumptions it has used to calculate the annual probability of temporary water use restrictions, ordinary drought orders and emergency drought orders. The company must include assumptions about the severity of drought it has used, and the methodology must refer to both the annual percentage of risk over the 25 years and the changes over the 25-year period. The company should report on the method it has used to confirm that it can comply with the more frequent drought measures (L1- L3). The company should justify any significant reduction in deployable output as a consequence of including the frequency as a constraint or outline how it intends to minimise the reduction. The company should outline its actual level of service.	We developed further information on our assumptions for TUBs and Drought and Emergency Drought Orders. We have provided additional details on how these affect the risk of restrictions in our final plan. We are additionally considering methods to quantify future risk.	
The company has set out the outcomes of its greenhouse gas assessment within its plan, but the plan does not include a methodology and there is no evidence of the assessment presented. It is not clear how the company has considered whole life carbon, which policies it has used or whether it has considered the PAS2080 or other relevant methodologies. The company has not set out how its Final WRMP will support the company's ambition to reach net zero by 2030 or the UK government's net zero greenhouse gas emissions targets and commitments. Therefore, the company has failed this direction. The company must provide: · The methodology and assumptions it has used to assess greenhouse gas emissions in its plan · A clear explanation on how the WRMP will support the company in achieving its carbon net zero target by 2023	We have prepared embodied and operational carbon assessments for all feasible demand and supply options. This was undertaken by Stantec and follows relevant UKWIR guidance, including a 2022 update providing guidance on how to assess embodied and whole life carbon for water industry assets ["Calculating Whole Life / Totex Carbon" - Report No. 22/CL/01/32]. This was applied alongside BEIS guidance on energy emissions and projections (2021), and HMT Green Book supplementary guidance on undertaking carbon assessments. The carbon assessments of the options are a key input in our best value framework. They form part of the option information used by the optimiser tool that informs our programme scenario testing. The information has been translated into a programme level view of carbon impacts for all the scenarios tested in the tool and are presented as part of the balanced set of Best Value metrics. This has allowed the whole life carbon emissions of all programme	For more information, please see Appendix 6: Best Value Planning Approach and Methodology

· A clear explanation on how the WRMP will support the UK government's greenhouse gas emissions targets and commitments	scenarios to be compared alongside the impacts on carbon sequestration through the Natural Capital assessment. The optimiser tool has the capability to identify programme scenarios that minimise carbon impacts for a given set of programme requirements. We have undertaken a sequence of tests for a range of alternative baseline scenarios and requirements. By comparing these with scenarios with different parameters we have developed an evidence base that will enable informed trade-offs to be made between different potential programmes, in terms of both their costs and performance against the Best Value metrics. The preferred and alternative plans are being built up and tested further for robustness for a range of future uncertainties. The approach enables a transparent, balanced approach to water resource planning that uses a Best Value framework to justify an ambitious approach to reducing greenhouse emissions alongside other social and environmental priorities, within an approach that is affordable and acceptable to the company's customers.	
The company has not assessed the impact of climate change for supply or demand for the Isles of Scilly. The company has not set out its evidence behind its assumption of a 0.1% increase in non-household demand from climate change for its mainland zones. The company has not set out an assessment of climate change in the options presented in its plan. It is unclear whether climate change would lead to a decrease in benefit over time. Therefore, the company has failed this direction. The company must include in its plan: · A method and assessment of climate change on demand for the Isles of Scilly. This can be completed using assessments using UKCP local from UKCP18 interface. · A methodology and its assumptions to calculate the impact of climate change on its non-household demand · An assessment of how climate change may impact the options presented in its plan and outline whether the benefit provided by those options would reduce over time.	We have revised our Supply-Demand forecast and drivers for the impacts of climate change and population growth for the Isles of Scilly. The move to desalination means we will increase supply-side resilience to climate change and that our WAFU is unaffected by future climate change. We have provided more detailed information on this in our revised WRMP.	More information is found in Appendix 6: section 3.1.3
The company has not set out the number of meters that are not charged by reference to volume, in other words shadow metering, that have been fitted at the commencement of the planning period. Therefore, the company has failed this direction. The company must clearly state whether it will have fitted any meters that that are not charged by reference to volume, in other words shadow metering, by the commencement of the planning period.	We have included a narrative in our Demand baseline that clarifies the number of household meters not charged by volume (shadow meters). All meters, irrespective of their charging basis, have been included in the data reported in the EA tables.	Please see section 4 on demand in our Technical Summary
The volumes for Charmouth (Lyme Regis) submitted by Wessex Water and South West Water do not match. In addition, Wessex Water say this import is not available in an unusual drought which is not reflected by South West Water's plan. The Environment Agency has reviewed the completeness and	We are working closely with the Regional Planning Group and Wessex Water to ensure that our plans are aligned at resubmission.	Please see Appendix 1. More information on our partnership working through the

consistency of baseline transfers presented in draft WRMPs. We expect these to be presented accurately and consistently in final WRMPs and will cross-check relevant WRMPs to ensure that these are presented correctly and that resultant supply-demand balance is accurate. The company should work with Wessex Water to ensure the security/ sustainability of this import. Both companies must reflect any agreement in place consistently across their respective plans and planning tables.		WCWRG is available on their website
South West Water includes an export at Crichel/ Stubhampton. This is not present in Wessex Water's plan. The Environment Agency has reviewed the completeness and consistency of baseline transfers presented in draft WRMPs. We expect these to be presented accurately and consistently in final WRMPs and will cross-check relevant WRMPs to ensure that these are presented correctly, and that resultant supply-demand balance is accurate. The company plan states that the export is never used. If an agreement is in place between the companies the export must be reflected consistently across both company's plans and planning tables.	We are working closely with the Regional Planning Group and Wessex Water to ensure that our plans are aligned at resubmission.	Please see Appendix 1. More information on our partnership working through the WCWRG is available on their website
In the Wessex Water plan the company show the Standlynch/ Whiteparish transfer as two separate transfers (import and export). In South West Water's plan, it is only in as an export. Additionally, Wessex Water include in it is not used but is maintained in case of emergency. South West Water just states that it is no longer used. The Environment Agency has reviewed the completeness and consistency of baseline transfers presented in draft WRMPs. We expect these to be presented accurately and consistently in final WRMPs and will cross-check relevant WRMPs to ensure that these are presented correctly and that resultant supply-demand. balance is accurate. The company should work with Wessex Water to ensure the security/ sustainability of this import. Both companies must reflect any agreement in place consistently across their respective plans and planning tables.	We are working closely with the Regional Planning Group and Wessex Water to ensure that our plans are aligned at resubmission.	Please see Appendix 1. More information on our partnership working through the WCWRG is available on their website
The Corfe Hills reservoir/Canford Bottom import and export transfer is showing as two separate transfers (import and export) in the Wessex Water plan but only one entry in South West Water's plan (reciprocal agreement). The Environment Agency has reviewed the completeness and consistency of baseline transfers presented in draft WRMPs. We expect these to be presented accurately and consistently in final WRMPs and will cross-check relevant WRMPs to ensure that these are presented correctly, and that resultant supply-demand balance is accurate. The company should liaise with Wessex Water and ensure this agreement is reflected consistently across both company's plans and planning tables.	We are working closely with the Regional Planning Group and Wessex Water to ensure that our plans are aligned at resubmission.	Please see Appendix 1. More information on our partnership working through the WCWRG is available on their website
Wessex Water have included an export at Smeatharpe to South West Water in its plan. South West Water's plan says this is no longer in use and Wessex	We are working closely with the Regional Planning Group and Wessex Water to ensure that our plans are aligned at resubmission.	Please see Appendix 1. More information

Water's plan says there is no formal agreement in place. The Environment Agency has reviewed the completeness and consistency of baseline transfers presented in draft WRMPs. We expect these to be presented accurately and consistently in final WRMPs and will cross-check relevant WRMPs to ensure that these are presented correctly and that resultant supply-demand balance is accurate. The company should liaise with Wessex Water and agree whether this export is still required. The company should decide whether this import should be included in the plan and provide an explanation for that decision. Any agreement should be reflected consistently across both company's plans and planning tables.		on our partnership working through the WCWRG is available on their website
South West Water states that it does not have any NAVs operating in its area. Records of NAV applications held by the Environment Agency show that IWNL, ESP and Icosa have applications dating back to 2021, most of which are granted. These applications are a combination of Water only and Water and Sewage. The applications show that all the NAVs who applied require a bulk transfer from South West Water. The received NAV applications for South West Water area equates to around 6200 HH and 25 non- HH, at the time of writing. South West Water should engage with the NAVs who have applied for licences within its area. It should ensure the plans are aligned and demonstrate that it has appropriately accounted for their use in its plan.	At the time of collating this plan there were no NAVs providing potable water supply to customers in our supply area, so consultation was not required. In recent months, 33 NAV connections have been added to our billing files and we shall record demand data as a potable export from 2023/24 onwards.	Section 5.3 in Appendix 2 discusses NAVs
South West Water's plan does not clearly describe the existing baseline water efficiency and metering activity undertaken by itself and by retailers operating in its area. The plan does not describe clearly how these activities are incorporated into the baseline demand forecast. The company do not detail how its preferred plan differs to its baseline activities in terms of activity and scale. South West Water should update the plan to include information about its (and retailers) baseline water efficiency and metering activities and how these are incorporated into the baseline demand forecast. It should also outline how the activities and scale of activity will differ between baseline and its preferred plan.	Our baseline water efficiency activities will comprise continuing with media campaigns and working collaboratively with HH and NHH customers to reinforce the value of water and to drive water consumption messaging. Our baseline metering policy is to replace broken meters with an AMR meter, but not to install smart meters. (Although our AMR meters allow for an AMI upgrade) We have had engagement with our retailers as part of developing our revised WRMP and through our drought-2022. Many of our retailers have expressed that without additional incentives they have minimal plans to drive water-saving or water efficiency activities with their customer base. We have therefore not assumed any retailer led water consumption reductions from 2025 onwards.	Please see section 6: Our Supply Demand Baseline in our in our main Technical Summary for more information on baseline efficiency.
In our pre-consultation letter sent in June 2022, we said: "We are aware that the company has limited data for the Isles of Scilly and this is being resolved. The company's revised draft Drought Plan included the first draft of the Isles of Scilly Drought Plan. We asked the company to update its drought plan to show where data was missing, the implications of the missing data, how the company is filling the gap, and when it will be available. We would like information on the company's plans to collect the data required to be included in the WRMP. This will help customers, stakeholders and regulators	We have provided greater clarity on our current levels of data for leakage, PCC, HH / NHH consumption for the Isles of Scilly and how we will fill any gaps in our data. We believe that in some cases it isn't clear who owns the data which may impact our data collection abilities. We deployed telemetry to allow us to measure distribution input on the Islands in August 2022. This covered all Islands except Bryher in the dWRMP. Following consultation with our customers, we have now extended the coverage to include Bryher. We are working with our customer services team	Some details are provided in Appendix 1 and Appendix 2, but we recognise we may need to expand on this for the final WRMP

understand the issues on the Isles and limitations of the plan." The company has not provided the information requested in this letter. The company should update its WRMP to show what data it currently does not have, how it is planning fill the data gap, when it expects to have the data available, what assumptions or other datasets it has used in the place of robust data. This could be a simple table as an Annex to the Isles of Scilly chapter.	to improve the reconciliation of our HH and NHH demand and continue to plan to deploy smart meters on the islands for AMP7.	
The company has uplifted mainland demand by 2% as a result of COVID-19. However, the company has not set out how it has considered COVID-19 on the Isles of Scilly. The company should update its plan to reflect how it has considered COVID-19 in its demand forecasting.	We have looked at the data on how Covid-19 may or may not have impacted demand on the Isles of Scilly and have worked with Ovarro to update our demand forecast which will include any possible future impacts of COVID.	Please see section 4.2.3: Note on the Isles of Scilly approach in our main Technical Summary and Appendix 2 for more information.
In the Isles of Scilly Chapter, the company outline the actions that it will be taking over the remaining AMP7 years on the Isles of Scilly. This includes metering and desalination plants. However, the plan is not clear on what the risk of this plan is, and it does not set out clear things it would do if the plan does not come to fruition. Additionally, the chapter is mostly focused on AMP7 works and does not feature any plans for AMP8 and beyond, as evidenced by the lack of a preferred plan as set out in recommendation 9.1. The company should update its plan to show the risks and uncertainties with its AMP7 programme. It should also include what it will do if these risks and uncertainties are realised.	We have updated our Isles of Scilly plan to reflect AMP7 together with any risks associated with delivery. Our metering programme is almost fully delivered. Our plans for the IOS outlines demand side options that will be implemented as part of achieving the overall company leakage and demand-side (HH and NHH) consumption targets.	AMP7 risks are partially covered in Appendix 1: section 2.2.3 but we recognise we may have to expand on this for the final plan. For information on the plans for AMP8 and beyond, please see Appendix 1: section 10.4.5.
In its data tables, South West Water present its DO numbers. However, in Bournemouth zone's line 6BL there is a dip in DO for two years in 2026/27 and 2027/28. It is not clear whether this is a mistake or a genuine drop in DO. If the drop in DO is genuine, South West Water should explain this in its text. For example, it may have reduced DO to account for a long- term outage event. If it is an error, South West Water should correct its tables.	We have checked the DO numbers for Bournemouth and will ensure these figures are correct in the update of our WRMP and the final the baseline supply forecast.	Please see section 6: Our Supply Demand Baseline in our main Technical Summary for more information.
The company has provided a report by Ovarro which outlines how the company has used micro components to forecast PCC. However, the figures presented in the charts in the report do not appear to align to the forecasts presented in the planning tables. The company has not provided methodology on how it has used the report to inform its PCC forecast. In addition, the Ovarro report shows that South West Water use significantly	The Ovarro report micro-component model provides WRZ data for existing household consumption, new connections consumption and meter optants consumption in a normal year scenario. The benefits of the AMP7 accelerated household demand reduction schemes project and the Green Recovery have been removed leaving a final normal year demand number. The dry year and	Please see Appendix 2 for more information.

higher plumbing loss volumes than Bristol Water and Wessex Water. The company have not provided justification or evidence of these high volumes. Finally, the company has not provided any method statement for how it has assessed PCC on the Isles of Scilly. The company should update its plan to: · Ensure it has explained how the Ovarro report has been used to inform the PCC forecast · Provide a justification and evidence on why it has such large plumbing loss volumes · Provide a method for how it has calculated PCC on the Isles of Scilly.	critical period uplift factors were then applied to calculate dry year and critical period demand where applicable. Additionally, we used recent APR data to redistribute total demand from Ovarro across our water resource zones. This ensures the zonal demand is reflective of the proportion each zone makes up of the total demand calculated by Ovarro. The data in the Ovarro report does not include the WRMP uplifts or recent APR allocation and therefore does not align with the planning table scenarios. The plumbing losses assessment for SWW was an independent assessment carried out on our behalf by Artesia. This did produce a value higher than our neighbouring companies. There is no evidence to suggest this is not representative and we have therefore used this value in calculating our baseline demand forecast. We will review again for our WRMP29. Isles of Scilly PCC has been calculated using the same approach as the other SWW zones, whereby Ovarro has provided a micro component forecast for HH demand which we use as the basis for our PCC calculation. We have provided the Ovarro Isle sof Scilly report as part of our submission.	
In the mainland part of the plan, the company have outlined that the risk of private supplies switching to mains water during a drought has been included within its high demand components of scenario testing. However, the company does not outline how it has considered private supplies switching to mains water during a drought on the Isles of Scilly. The company should update its plan to reflect how it has considered the risk of private supply customers switching to mains water during a drought.	We considered the risk of private supplies on the Isles of Scilly switching to mains water. During a drought, customers on private supplies may experience poor water quality or risk of running out of supplies, which could lead them to request a mains connection. We reviewed the number of such connections for the Isles of Scilly in 2022/23, which was a drought year in our region, and there were none. However, we recognise the number of requests could increase once desalination plants are installed and there is an alternative to groundwater supply and so we are designing for 100% population on mains-water in our baseline.	Please see Appendix 2 for more information.
The South West Water patch is made up of 5 WRZ, all of which has different characteristics and challenges. For some zones, tourism has a very large influence on water demand, as an example. However, the company has not provided a clear explanation of the socio- economic and geographic factors which influence the patterns of use in each of its WRZ. The company should update its plan to include clarity on the socio- economic and geographic factors which influence water use in each of its WRZ.	We carried out an initial review of the socio-economic factors and tourism levels in each of our WRZs. This data allows us to segment customers by factors such as property type, age and affluency and to compare water use for each segment. We have also collated data on types of tourism such as self-catering or staying with friends for each zone. This is a new data set and further analysis is needed and we will develop it further to support our water efficiency campaigns.	Please see section 4: Demand Forecast in our main Technical Summary and Appendix 2 for more information
South West Water's Problem Characterisation process identified that the scale and complexity of their water supply planning problem is currently medium and shows an increase in both complexity and strategic need from WRMP19. This would suggest that a medium level outage methodology should be adopted, in other words, evidence-based combined distribution method rather than the basic reference method. There is no discussion around the method	Outage is a relatively small component of risk and so we have prioritised efforts appropriately on outage and focused on other priorities. However, we will review this position for WRMP29.	For more information, please see Appendix 1: Section 7.

selection and links to the problem characterisation. The Outage assessment needs to be more sophisticated to reflect the supply demand issues in SWW Water Resource Zones. The evidence-based combined distribution method would provide a greater insight into the outage risk when the supply system is under stress (drought). Given the increased complexity and need in the problem characterisation, the company should review tools and methods used to produce the Outage Assessment.		
The outage report states that a "full listing of all data provided to AECOM is attached to this report" but this has not been provided in the company's plan. If the report references data, it should be provided.	The AECOM outage report has been updated and is reflected in the final plan.	For more information, please see Appendix 7.1
It is unclear if the outage analysis has been undertaken using the source works output data and reservoir storage levels for a four-year period 2017-2021, or just the period April 2020 to the end of March 2021. In either case this is a very short record. Given that a similar approach to outage was adopted in two previous plans the data generated for those assessments should have been used. Provide clarity over the data and time period used in the analysis. The outage data from previous planning rounds should be used in the analysis. The outage data is not of sufficient quality to support the company's outage allowance assessment, and the company should provide a detailed action plan to show how it will rectify this.	We have reviewed our risk of outage and consider it impacting our plan is relatively low. However, we will complete a full review for the WRMP29.	For more information, please see Appendix 7.1: section 2.1
Only outages when output of a source works fell to 30% below the 30-day running average and the strategic reservoir in the WRZ is less than 90% full were selected. This approach excludes legitimate outage events (e.g., plant failure or partial source output reduction). Greater clarity is needed around how many and nature of the excluded "Operational decision" outages. Finally, the approach could mask the risk around seasonal events such as the Autumn leaf fall, which was identified in the report and freeze thaw events. The approach to outage event selection should be reassessed tonsure there is a better assessment of system stress outage risk.	Autumn leaf fall that currently affects Colliford pump storage is being addressed as part of an engineering project that will be delivered during summer 2023. We have reviewed our outage and will provide a review for WRMP29 but currently consider the risk of outage impacting our plan is relatively low.	For more information, please see Appendix 7.1: section 3.4
There is no explanation why the 95th percentile probability was chosen or what probability distributions were used. The approach to the probability and distribution selection should be explained with reference to the Risk Based planning guidance. The outage values remain constant through the planning period even though the WAFU decreases by approximately 9%. The company should explain why the outage allowance does not change through the planning period.	We have explained this in the final WRMP.	For more information, please see Appendix 7.1: Section 7.2
The outage allowance is zero which does not reflect the risk given the nature of supply during system stress (drought). The company must undertake an assessment of outage risk in the Isles of Scilly.	We have explained this in the final WRMP.	Appendix 7.1: explains low outage risk, but we

		recognise we may need to expand the narrative for the final plan.
The company does not demonstrate how it has calculated treatment works operational use. In addition, the company has forecast treatment works operational use for Wimbleball zone as 0Ml/d. This seems unlikely as this has been greater than zero in each of its annual reviews and in WRMP19 South West Water forecast it as 1Ml/d. The company should provide a method for how it has calculated treatment works operational use. The company should recalculate its treatment works operational use for Wimbleball zone and ensure the volumes forecast are representative.	We have explained the method for how we calculated treatment works operational use in the revised draft WRMP. We have also recalculated the treatment works operational use for Wimbleball Zone and ensured the volumes forecast are representative.	Please see section 5.7 of our Technical Summary
In South West Water's WRMP, the company provide a DYCP for its Bournemouth and Isles of Scilly zones. However, the company does not provide a method for how it has derived the baseline numbers for the DYCP nor how it has calculated the options benefits for the DYCP. Similarly, the company have provided information in its tables for a NYAA but has not provided information on what event it has based its NYAA on. The company should update its plan to demonstrate how it has forecast for DYCP and how it has derived the options benefits. The company should provide narrative on its NYAA scenario and on what it is based.	We have been working on the DO modelling for each new supply option although the time constraints means we have not fully met the requirements in the revised plan. We have explained the details within the plan narrative.	Our Baseline Deployable Output (DO) is discussed in section 5.3 in our main Technical Summary. Please see Appendix 1 for more information.
The company has only provided DO information in Table 1c for DYCP. The company should update Table 1c to show DYAA Deployable Output.	We have reviewed this table and completed the DYAA data as part of our revised plan.	Please see section 6.3: Baseline supply-demand balance in our Technical Summary.
In South West Water's WRMP, the company regularly refer to different scenarios for different zones for the same topic. As an example, for its options benefits the company use DYAA figures for Colliford, Roadford and Wimbleball zone, but for Wimbleball and Isles of Scilly the company use DYCP. This is inconsistent and confusing. The company should review its plan and ensure the company is consistent with the scenario it uses when discussing forecasts and options benefits. We expect this to be DYAA, but the company should also provide information on how the options would benefit it in its DYCP scenario.	We previously completed the tables based on the constraining scenario for each resource zone to demonstrate the need for investment but have now used DYAA data for all the tables.	Please see section 6.3: Baseline supply-demand balance in our main Technical Summary.
The company has assumed an increase of 0.5% for its population and property forecast. The company has not used ONS data as this does not align with the growth the company has observed. The company does not outline where the 0.5% growth assumption comes from and does not justify it. The	We have carried out a review of population and property forecasts for the IOS, and have included this narrative in the revised WRMP.	Please see section 4: Demand Forecast in our main Technical Summary and

company should include in its plan a clear and justified method for forecasting properties and population on the Isles of Scilly.		Appendix 2 for more information.
As part of its population forecast South West Water has not provided a forecast on the number of properties and population which are on private supplies in its region. The plan states that the risk from private supplies switching supplies to mains supply is included in its adaptive pathway. South West Water should update its plan to: · Include a methodology for assessing the number of private supply properties and population · Linked to recommendation 2.2, ensure the risk from private supplies to mains supply is adequately covered by the plan	We have undertaken a study and believe the uncertainty around the impact of private water supplies is covered within our headroom assessment.	Please see section 6.1: Target headroom: allowing for uncertainty for more information.
As part of its property and population forecasts South West Water does not outline how the communal non-household population is distributed within each WRZ. South West Water should provide information in its plan on the distribution of communal populations within each of its WRZ.	We have detailed the communal establishment forecast in our revised demand forecast commentary.	Please see section 4: Demand Forecast in our main Technical Summary and Appendix 2 for more information.
In South West Water's forecast of new build properties, there is an unusual uptrend in the new properties forecast figure from 2046. Between 2020 and 2046 South West Water forecasts a decreasing trend of new build properties, but from 2046 there is a sudden increase and plateau. This sudden change has not been explained. South West Water should review its new build property forecast and ensure it is accurate. The company should justify the sudden change in new build properties from 2046.	We have provided further explanation in our revised demand forecast commentary.	Please see section 4 (Demand Forecast) in our main Technical Summary and Appendix 2 for more information.
The company states that it worked with local planning authorities to inform its property forecast. However, the plan does not outline which planning authorities it worked with. The plan also does not state which versions of the planning authorities plans it used to inform its forecasts. The company should update its plan with further information of which local planning authorities it worked with. It should provide additional details on the version of local authority plans it used to support its development of a property forecast.	We've worked with all the local planning authorities across our region from planning application stage through to approvals to enable us to forecast and meet future demand. We can provide a list if required.	Please see section 3.5 (Customer and Stakeholder Engagement) in our main Technical Summary for more information.
Chapter 6 outlines the company's methodology for forecasting non-household numbers. However, the plan does not outline whether the company has applied the Ofwat supplementary guidance outlined in the Water Resource planning guidance. It has not explained whether applying the guidance has led to a change in its projections of non-household numbers. In addition, the company do not clearly identify which types of property have been classified as non-households. The company should update its plan to ensure it has used	We have followed the updated guidance in deriving our non household property forecast.	Please see section 4 (Demand Forecast) in our main Technical Summary and Appendix 2 for more information.

recommended guidance to produce its non-household forecast. It should outline whether the use of the guidance changed its non-household property forecast. It should demonstrate the types of property it has included in its non-household forecast.		
The company has submitted one or more schemes to be considered for acceleration in the remainder of AMP7. An announcement around the outcome of this acceleration process is expected in March. Ensure the company's revised draft plan takes account of any decisions on its scheme acceleration proposals where applicable.	We have received the Defra accelerated scheme decision and have incorporated this into our demand forecast.	Please see section 4: Demand Forecast in our main Technical Summary and Appendix 2 for more information.
In 2022, South West Water applied for a new abstraction licence on the river Lyd. The company was also granted funding for a new abstraction at Gatherley. The company has included some information on these schemes in its plan, but it is not clear how the two work together and how the company has derived the DO benefit of this. It does not appear the company has included the full DO benefit from these licences. We sought clarification from the company on this during consultation. The company should update its WRMP to include the information provided in the clarification.	We have included a more comprehensive account of how these abstractions work together and how we have derived the DO benefit they realise in the revised dWRMP24.	Please see section 5.4: our role in achieving sustainable abstraction in our main Technical Summary and Appendix 1 for more information.
South West Water has provided its climate change assessment in Chapter 5. However, this lacks detail and transparency on methodology and products for assessing the impact of climate change. In its October 2022 submission, an academic review of the climate change assessment was provided as an appendix and contained far more detail in methods, however a third-party review is not sufficient evidence for what the company has done. Additionally, this review was not included in its February published plan. Additionally, the Climate Change Water resources planning guideline supplementary guidance outlines that companies should be using UKCP18 products. The company have used UKCP18 products to inform its climate change assessment on the DO forecast. However, for the impact of Climate Change on demand, the company has used UKCP09. The use of different UKCP18 across the supply demand forecast presents an inconsistency. The company should clearly state which UKCP18 products were used and which ensembles/percentiles where appropriate, and why they were selected. It should explain decisions made and methods applied to its climate change methods. The company should review its demand forecast and use UKCP18 products to inform the impact of climate change on demand. If the company has justifiable reasons for using UKCP09 and creating the inconsistency between supply and demand climate change forecasting, it should outline this in its plan.	Our demand forecast has followed the EA's WRPG which refences the UKWIR guidance "The Impact of Climate Change on Water Demand" (2013). The UKWIR (2013) methodology is based on UKCP09 and has not yet been updated for UKCP18. In a review of UKCP18 commissioned by UKWIR "Integrating UKCP18 with UKWIR Tools and Guidance" (2019) it was recommended that the overall approach to demand and climate change is reviewed rather than simply updating the existing approach with new UKCP18 products. The overall impact of climate change impact is small for our WRZs (1%-1.5% for DYAA and 2%-4% for DYCP). Full details on this assessment will be provided in our revised dWRMP24 demand forecast.	Please see section 3.3.2: climate change and section 4.4.3: Impact of climate change on consumption in our main Technical Summary and Appendix 2 for more information.

In Section 1 of the "Climate Change Water resources planning guideline" supplementary guidance, a number of reports the company should consider in its WRMP were provided. In South West Water's draft WRMP does not demonstrate that it has used these reports or provided evidence that it has used other relevant guidance in their place. The company should update its plan to show what reports and guidance it has used to inform its climate change assessment. Should these reports differ to those set out in guidance, the company should justify the use of other materials.	We have revised the draft WRMP24 to give a fuller account of which reports and guidance have been used to inform the climate change assessments.	Please see section 3.3.2: climate change in our main Technical Summary for more information
In its plan, South West Water have provided its Drought vulnerability assessment in Chapter 5. However, the company does not provide clarity on what tier of assessment has been applied for each WRZ due to lack of methodological information. No analysis of the UKCP18 products is evidenced in the South West Water plan. Additionally, the plan states that the level of vulnerability has changed for two WRZs, but the new levels of vulnerability are not stated. The company currently have not completed a vulnerability assessment of the Isles of Scilly. The company should state the methods for vulnerability assessment more plainly, detailing and justifying how UKCP products have been used and sampled. The company should clarify how the vulnerability has changed for the WRZ and provide the latest information in its plan.	In our revised draft WRMP, we have described the methods for vulnerability assessment more plainly, detailing and justifying how UKCP18 products have been used. We have also clarified how the vulnerability has changed for the WRZ and provide the latest information in the revised plan.	Please see section 2.5: Drought Vulnerability Assessment in our main Technical Summary and Appendix 1 for more information
The description of the methodology for climate change impact on DO is applied is at a very high-level, meaning that it is very difficult to judge how well the impact was assessed. The regional methodology sets out a robust methodology and guidance for South West Water to follow, however the Bath University review submitted in October 2022 indicated alternative methods were used by South West Water. The impact of Climate change on DO, varies significantly across the region. The impact on the Bournemouth zone seems high and the impact on the Colliford, Roadford and Wimbleball zone seems small. It is unclear how the company has arrived at the climate change impacts it has. The company should clarify which models and UKCP18 products and ensembles were applied, how they were sampled, and justify their selection. The company should ensure consistency of reporting across different reports on the products and methods used. The company should provide a detailed method for how it has assessed the impact of climate change on DO.	Thank you for highlighting these inconsistencies and the need for more methodological detail relating to the methodology for climate change impact on DO. In our revised dWRMP24, we have clarified which models and UKCP18 products were applied, how they were sampled, and justified their selection. We have also ensured consistency of reporting across different reports on the products and methods used, and provided a detailed method for how we have assessed the impact of climate change on DO	Please see section 3.3.2: climate change and section 5.3: Baseline Deployable Output in our main Technical Summary and Appendix 1 for more information
In its October 2022 submission, South West Water state that water available for use (WAFU) was scaled using WRMP19 scaling methodology from base year to 2029/30 and the 2017 Environment Agency scaling method from 2030/31 until the end of the planning period. This was removed for its February 2023 published version. In October 2022, further details were not provided and the choice to use different scaling approaches for different	We have included information on the approach taken to scaling our WAFU and provided a clear justification of our method in our revised dWRMP.	Please see section 5: Supply Forecast in our main Technical Summary and Appendix 1 for more information.

periods is not justified, or the reason for not using the most up to date scaling approach. As this was removed in February, the plan contains no information on the scaling approach taken. South West Water should justify its methods, and choice of year to scale back from, the scaling equations used and exemplify its use.		
South West Water has completed climate change headroom (46BL) out to 2050. This is kept at 0 for Isles of Scilly due to lack of UKCP18 products for the isles. The choice of UKCP18 products for exploring climate uncertainty are not explained or justified. This is also not consistent with the methodology proposed by HRW in the regional methodology report. No range in values are reported. The company should provide information of the ensembles and outputs used for reporting. The uncertainty should be informed based upon a range of UKCP18 products. The company should further explain and justify why RCP6.0 was used for reporting. Isles of Scilly can now complete climate change assessments using UKCP local from UKCP18 interface.	Thank-you for highlighting these inconsistencies and the need for more methodological detail relating to the assessment of climate change for the Isles of Scilly. The maturity of information available to do a climate change assessment for the Isles of Scilly is not the same as our other WRZs and is not compatible with the information available from UKCP18. We have an ongoing programme of work agreed with the Environment Agency for groundwater and environmental monitoring which is aimed at providing this evidence base to inform our future assessments. However, this will not be available for our WRMP24. In future, water for the Isles of Scilly will be supplied by desalination that can meet 100% of demand and therefore will be resilient to future climate change. Our future groundwater abstractions under climate uncertainty will be assessed as part of our monitoring plan once we have the required baseline of information. This will also feed directly into the licence renewals ahead of 2030.	Please see Appendix 4 and Appendix 6
The company is looking at desalination and the use of mining waters to increase its DO. Both of these options are carbon intensive. It is unclear how the company plans to meet its carbon net zero commitment if it does introduce these options. The company should set out in its plan how it will achieve its carbon net zero target, in light of carbon intensive options that it may be using or plan to use. As part of its carbon assessment South West Water has not: · Provided a carbon uncertainty assessment. For proper calculation of carbon emissions, any uncertainties in the data should be considered. · Provided information on how it has conducted a whole life carbon assessment and whether it has followed any frameworks. · It is not clear whether the company has followed appropriate methodologies such as PAS2080 and it is not clear whether the company have used standard carbon tools or models to calculate carbon costs. This is linked to recommendation 11.3. South West Water should provide an assessment of the uncertainty associated with its carbon data. It should also provide information on how it intends to minimise the uncertainty. The company should provide information on how it has conducted a whole life carbon assessment in its plan. The draft WRMP should be updated to provide clarity on which methods, tools and models the company have used to complete its carbon assessment.	We have prepared embodied and operational carbon assessments for all feasible demand and supply options. This was undertaken by Stantec and follows relevant UKWIR guidance, including a 2022 update providing guidance on how to assess embodied and whole life carbon for water industry assets ["Calculating Whole Life / Totex Carbon" - Report No. 22/CL/01/32]. This was applied alongside BEIS guidance on energy emissions and projections (2021), and HMT Green Book supplementary guidance on undertaking carbon assessments. The carbon assessments of the options are a key input in our best value framework. They form part of the option information used by the optimiser tool that informs our programme scenario testing. The information has been translated into a programme level view of carbon impacts for all the scenarios tested in the tool and are presented as part of the balanced set of Best Value metrics. This has allowed the whole life carbon emissions of all programme scenarios to be compared alongside the impacts on carbon sequestration through the Natural Capital assessment. The optimiser tool has the capability to identify programme scenarios that minimise carbon impacts for a given set of programme requirements. We have undertaken a sequence of tests for a range of alternative baseline scenarios and requirements. By comparing these with scenarios with different parameters we have developed an evidence base that will enable informed trade-offs to be made between different potential programmes, in terms of	Carbon assesments for each option will be in Appendices 4 and 5 respectively. Appendix 6 should explain how we've used this information to develop the preferred plan.

	both their costs and performance against the Best Value metrics. The preferred and alternative plans are being built up and tested further for robustness for a range of future uncertainties. The approach enables a transparent, balanced approach to water resource planning that uses a Best Value framework to justify an ambitious approach to reducing greenhouse emissions alongside other social and environmental priorities, within an approach that is affordable and acceptable to the company's customers.	
Section 8.3 of the WRMP guidance lists the information that should be provided for each option. This included total carbon for feasible options. The company should provide the missing information.	Our feasible options now have total carbon calculated, in accordance with the WRMP guidelines. We have prepared embodied and operational carbon assessments for all feasible demand and supply options. This was undertaken by Stantec and follows relevant UKWIR guidance, including a 2022 update providing guidance on how to assess embodied and whole life carbon for water industry assets ["Calculating Whole Life / Totex Carbon" - Report No. 22/CL/01/32]. This was applied alongside BEIS guidance on energy emissions and projections (2021), and HMT Green Book supplementary guidance on undertaking carbon assessments.	Please see section 7.7.3: Accounting for and reducing greenhouse gas emissions in our main Technical Summary for more information.
The company refers to the three pillars set out in the Regional Plan. It is assumed that these are the company's objectives, as required in section 10.2 of the Water Resources Planning Guidance. However, Chapter 1 Section 2, Chapter 10 Section 1.1 and Chapter 10 Section 1.6.2, all seem to contain different objectives. It is therefore not clear which set of objectives the company is using. Additionally, if the three pillars from WCWR Regional Plan are the company's objectives, the company has not justified these in its WRMP. The company should: · clarify what objectives it has developed its plan against. · include justification in its WRMP for the objectives it has used.	Our revised plan focuses on delivering the following high level outcomes: - Improve the environment - Ensure water supply resilience, and - Deliver societal benefits. As well as aligning with the WCWR Regional Plan, these reflect government and regulator policy, the company's aspirations and the views of its customers and stakeholders aspirations. The final plan sets out the basis on which the objectives were selected in full and provides the 'golden thread' from the high level outcomes to the selection of the preferred plan.	Please see section 8.2.3: our regional plan in our in our main Technical Summary for more information.
The company demonstrates how its preferred and least cost plan performs against the three pillars. However, the company does not compare the plans against its best value metrics as set out in Section 10.6 of the planning guidance. As set out in Section 10.6 of the planning guidance, the company should provide a summary table which includes the cost and the result of assessing the options and programmes against each best value metric. This summary of programmes should be accessible for customers, stakeholders and regulators and enable them to understand the decision-making process.	In our revised plan, we set out the decision making process and explain how we used it to develop our preferred and alternative plans. We have provided a comprehensive appraisal of our preferred and alternative plans, which takes account of their cost and expected impacts, in terms of each of our best value metrics. We hope we have drafted this in a way that is accessible and provides appropriate information to customers, stakeholders and regulators.	Please see section 8: Our decision making process in our main Technical Summary and Appendix 6 for more information.
The WRMP sets out the company's approach to identifying supply and demand options. The company sets out that it identified 157 and 84 supply and demand unconstrained options, respectively. As part of its submission, South West Water has not provided lists of its unconstrained options and the reasons for them to be rejected. Additionally, the company has not provided indicative benefits for all of the options presented for Isles of Scilly. The company should provide lists of its unconstrained options and provide	We have provided a more comprehensive justification for options that have not been included in our feasible list. Many options are not yet feasible and require further work to confirm costs, benefits and or uptake/ customer acceptability.	Please see Appendix 4.3

justification for its option being rejected. The company should update its plan to provide indicative benefits for the Isles of Scilly. Linked to recommendation 4.10, the company should review its unconstrained list and identify if there are addition options it could include in its plan.		
In 2022/23 as part of its drought response, South West Water identified a number of actions which it could implement: · Mining waters · Onshore desalination · Offshore desalination · Importing water from other countries and other water companies by train or ship. WRMP planning guidance requires companies to include all options from WRMP19 and any other options it has identified since in its unconstrained list. As South West Water have identified the above as potential options, these should be included in its unconstrained list. The company should update its WRMP and include all actions it considered as part of its 2022/23 drought response in its unconstrained options list.	These details are provided in the resubmitted draft WRMP24.	Please see Appendix 4.3
The company has not outlined how it has derived its benefits for the below options · Supply side options – information on how it has derived the benefit from new abstractions and treatment works expansion. · Distribution options (leakage) – information on how it has derived benefit from each leakage action and the benefit of doing the actions on each leakage component. · Metering options – the assumptions and evidence on demand reduction which results from each metering activity. There are different demand reductions from each type of meter installed and also different demand reductions if an existing customer on a 'dumb' meter is replaced with a smart meter. There will also be differences between household and non-household benefits. · Household and non-household water efficiency – the assumptions and evidence in water saving from water efficiency activities Equally, the company has not outlined the constraints and uncertainties to the above listed options and how it has addressed this. The company should update its plan to show: · A clear method on how it has derived its options benefits · What evidence it has used to inform the method · The constraints and uncertainties present for each of its options. · How the plan addresses the uncertainties in the options	A detailed option summary report has been provided which sets out the option-level costs, benefits (MLD and wider societal benefits), carbon and environmental considerations. We have considered cost and water-saving uncertainty in the development of our options. This uncertainty has been used as an input into our decision-making process. This is discussed further in "developing our best value plan". We have fully revised and refreshed our Demand Side Options and have provided a comprehensive narrative on cost, benefits, carbon and environmental assessment for each option that has been considered feasible in our plan.	Please see Appendix 5: Demand Options in our main Technical Summary and Appendix 6: Best Value Planning Approach and Methodology

The reason for not taking options forward to the constrained list are not provided for each option. The parameters and assumptions agreed for each feasible option, as well as the full option descriptions were not provided. The company should provide the missing information	A detailed option summary report has been provided which sets out the option-level costs, benefits (MLD and wider societal benefits), carbon and environmental considerations. We have considered cost and water-saving uncertainty in the development of our options. This uncertainty has been used as an input into our decision-making process. This is discussed further in "developing our best value plan".	For more information, please see Appendix 6: Best Value Planning Approach and Methodology
South West Water has described its water efficiency programmes at a company level and it does not break it down to a zonal level. The planning tables demonstrate that the company is not anticipating that these programmes will be distributed equally among the zones. The company does not demonstrate how the demand side options will differ by zone in its main plan, it also does not justify why there is a difference. The company also does not outline how the number of meter installs for each metering activity will differ by zone. The company should update its plan to show how it intends to roll out its water efficiency and metering programmes to the WRZ within its patch. If zones have more programme activity than others, it should explain clearly why this is.	Our demand side options are presented in the WRMP tables at WRZ level for our revised WRMP24.	This is set out in Appendix 5.5.1
In its WRMP, South West Water has not outlined the assumptions it has made on its optional metering programme. It is not clear how the company has forecast optional metering in its baseline nor whether in intends to undertake programmes which would uplift the natural number of meter optants in its preferred plan. The company should ensure its plan includes the assumptions it has made on metering in its baseline forecast. It should also ensure it is clear on its approach to optional metering in its final plan.	Meter optants from 2025 onwards are not included in our baseline but are included in our demand-baselines up to 2025. A full range of meter options have been considered and our meter-optant programme does not assume any uplift in activity to further-promote customer uptake. Our forecast of meter optants is based on historic volumes, with rates of meter optants reducing as meter penetration reaches 90%. Meter optants are included in the baseline forecast and total metering reaches 90% by 2049/50. In the baseline forecast the optant meter installs are all basic. The metering strategy proposed in WRMP24 is to install AMI meters from 2025 onwards. All new connections and optants would receive AMI meters and existing properties will be retrofitted with AMI meters once the basic meters reach end of life.	We have clarified meter optant assumptions, and what is included in our baseline in Appendix 5
In its WRMP, the company has forecast a maximum metering penetration of ~90% for Bournemouth, Colliford, Roadford and Wimbleball. The maximum meter penetration for the Isles of Scilly is higher at ~94%. The company has not outlined why Isles of Scilly can achieve a higher metering rate than the mainland zones. Chapter 4 states "In 35% of instances, it is not viable to install a meter…". It is unclear how the company has derived this assumption. The company should justify why its maximum metering penetration is 89% for its mainland zones. The company should justify its metering installs assumption.	We have used industry best-practice to derive a reasonable maximum meter penetration for our mainland WRZs, recognising that some properties are un-meterable, and we do not have the power in areas other than BNW to enforce meters. The IOS has managed to achieve a higher meter penetration because it is an island community which values the limited water sources on the island. This has enabled SWW to have a much closer working relationship with the island inhabitants. We do not recognise the reference to "35%" in our Chapter 4, section 4.3.4; we will ensure that our assumptions on each metering option are described with greater clarity in our "options appendix". We are modelling COO at using a conservative 30% success rate in our resubmitted plan.	Appendix 5.1 setsout the meter penetration assumptions

The company outlines the metering programmes it has looked at. In the Water Efficiency and Leakage sections, the company has provided tables which describe what the options are. However, the same level of information is missing for metering and what is present is difficult to interpret. Table 15 is especially difficult to interpret with the company only providing short names for the scenarios presented. It is unclear how the company has included optional metering in its metering options. The company has also not justified why it has not looked at AMI metering for Roadford zone (see Recommendation 2.4). The company should review its metering section in Chapter 9 and ensure it has sufficient information to enable understanding. It should ensure it clearly outlines what metering strategies it has looked at and define the programmes in Table 15.	We have provided WRZ level metering options in our WRMP options tables to provide clarity on the selected components of our metering strategy. The feasible options assessed comprise; meter optants, change of occupancy, compulsory, dual billing, increased meter reading frequency, meter upgrades to AMI technology.	A full description of all metering options is included in Appendix 5.1
Appendix 9 outlines how South West Water will achieve the full 50% leakage reduction by 2050. However, the potential leakage savings from AMR and AMI smart metering are excluded. The overlap in leakage reduction from AMR and AMI on top of the leakage strategies needs to be made clearer in the plan	The production of our options has considered the interdependencies between our metering and leakage programmes. Our leakage scenarios have been developed to consider the inclusion and exclusion of metering in achieving the overall leakage targets.	Appendix 5.1 sets out both the consumption benefits and leakage benefits from metering for each option considered.
South West Water does not outline any information on its new build or selective metering strategy. The company should update its plan with how it intends to meter new builds and what its strategy for selective metering is.	All new connections / new builds will have AMI meters installed. We have ensured that our selective metering strategy has been clarified as part of our best value plan chapter.	Please see the Technical Summary on demand management and Appendix 6: Best Value Planning Approach and Methodology
It is not clear how the water efficiency options have been combined to develop an optimum blend of demand-side interventions to achieve a PCC reduction to 110 l/h/d. Provide greater clarity and explanation of how the "optimum" blend of demand-side options was developed.	Our updated decision-making chapter sets out a comprehensive explanation of how we have optimised our blend of demand-side interventions to achieve both our PCC reductions and the over-arching consumption reduction targets set by the government.	Please see the Technical Summary on demand management
Section 8.3 of the WRMP guidance lists the information that should be provided for each option. This includes an assessment of your customers' support for the option. The company should provide information on customers' support for each of its options.	Our Options Summaries includes a summary of the customer research performed and how we have used this to inform our choices of options and the preferred plan.	Appendix 5 sets out the completed customer research and feedback on demand options
The plan does not outline how it will support vulnerable customers in its metering programmes. The company should outline how it will ensure its vulnerable customers are supported.	As part of our meter roll-out we offer a social tariff, and a lowest bill guarantee, which will ensure that vulnerable customers receive appropriate support.	More information is in sections 7.4 and 9.1 of the main Technical Summary.

		Our financial support information is available at: practical-help
The company outlines a number of water efficiency programmes in its WRMP that are designed to support customers in reducing their water use. However, the company does not outline how it plans to promote these programmes to customers nor has it justified the amount of uptake it is expecting. The company should update its plan to demonstrate: · How it intends to promote its water efficiency to customers · How it knows the required uptake will be achieved by these methods	Our option summaries provide information on the expected uptake and likely promotion activities for each water-efficiency activity.	This is covered in Appendix 5.1 on how we will promote all the options to drive customer uptake.
There are a number of feasible supply-side options that have not been included in the supply side modelling. For example: · COL3 - Abstraction of Colliford compensation flows when making supply releases · COL4 - Abstraction of Siblyback compensation flows when making supply releases. These options require a change to the existing abstraction licenses for proper implementation. The company should include all feasible options in its supply-side modelling. This should be done for the revised draft plan.	Thank you for your comments. These are included in the resubmitted draft WRMP24.	Please see Appendix 4.3
The Ofwat core scenario plan has been included within the tables but the narrative lacks detail on how this has been developed within the plan itself. We recommend the company provides more narrative around Ofwat's core scenario plan.	We have provided a full explanation of the process for deriving our core plan, along with detailed justification for our decision making, as part of our "Developing our Best Value Plan"	Please see section 8: Our decision making process in our main Technical Summary and Appendix 6 for more information.
In Chapter 10 of its WRMP, South West Water compares its least cost and best value plans. This comparison consists of a comparison of the options it would implement and the programmes' performance against the three pillars. However, this does not comply with what the section 10.6 of the WRMP guidance asks companies to do. South West Water's WRMP does not compare: · Best value metrics · Monetised, quantitative and qualitative descriptions of the impacts of the programme · Analysis and description of the significance of impacts · A total delivery cost of each programme incl. profile of costs against time · Detail of the programmes including costs and benefits. The guidance recommends a simple table showing this. South West Water's comparison between the programmes does not go far enough. The company should produce a detailed comparison of the programmes it has considered. This should include all the comparison points listed in the WRMP planning	We have reviewed the programme appraisal, including the Best Value metrics analysis and have presented this in our revised WRMP24.	For more information, please see Appendix 6: Best Value Planning Approach and Methodology

guidance. Linked to improvement 12.1, this comparison should include its best for the environment and society programme and any other programmes South West Water includes.		
With the use of a single objective there is a risk that the scoring and weightings can cause bias in the selection of a best value plan. SWW has used a combination of customer evidence (customer preferences) and expert judgement to set these values. However, it appears that the modelling approach, the Best Value Index (BVI), has not been assured. The company should undertake assurance of the best value plan weightings and scorings through further stakeholder engagement	The updated best value framework uses eight BV value metrics that are aligned with our three high level objectives, alongside cost. These are largely monetised (including the natural capital assessments), which reduces the scope for bias through the scoring and weighting process. Some of the metrics use SWW customer willingness to pay values from customer research. Where there are ranges, we have undertaken appropriate sensitivity testing to understand any tipping points in option selection / year of implementation. We will also draw on research about customer priorities and ensure the weighting undertaken in the Best Value scenario is aligned.	Please see section 8: Our decision making process in our main Technical Summary and Appendix 6 for more information.
South West Water outlines its assumptions on the reduction of demand resulting from water labelling. The company's assumptions on the savings from water labelling has been informed by the WRSE Group report "Government demand management savings and implementation profiles" (February 2022). The company states that it has assumed water labelling will contribute a 30% saving by 2050. The WRSE report referenced states that water savings from water labelling would be: · 6l/h/d after 25 years for labelling with no minimum standards · 12l/h/d after 25 years for labelling with minimum standard. The report indicates this is the most reliable estimate· 24l/h/d after 25 years for water labelling with minimum standards, plus enhanced support on new developments As South West Water forecasts PCC in 2025/26 is 152.3l/h/d, the company appears to have vastly overestimated the impact of water labelling by 2050 (30% of 152.3l/h/d is 46l/h/d, which does not align to the WRSE report figures). The company has not provided information on how the WRSE report has informed its estimate nor justified its 30% assumption. The company should review its assumptions on water labelling and clarify its use of the WRSE report. We assess that based on the information presented the company has over estimated the impact of water labelling and should revise its benefits.	We acknowledge the updated Water Labelling assumptions published by Defra and have incorporated these into our WRMP options tables. https://consult.defra.gov.uk/water-efficiency-labelling/water-efficiency-labelling/supporting_documents/Water%20efficiency%20labelling%20consultation.pdf The water saving from water labelling is now included as a demand-option to provide clarity on ML/d savings. Our revised assumptions include a 1.5 litres per capita per day assumption from year 10, and a 13.0 litres per capita per day assumption from year 25.	Please see section 9.3: water efficiency in our main Technical Summary and our Technical Summary on demand management
In April 2023, Defra published a report titled "Our integrated plan for delivering clean and plentiful water". Section 3 of this sets out how Defra will ensure a plentiful supply of water in the future. This document was not available at the time of South West Water's draft WRMP. South West Water should ensure its WRMP reflects Defra's plan and demonstrate how it has considered the plan. Particularly, the company should reflect on the demand sections of the plan in sections 3.5 and 3.6.	In line with this Defra publication (April 2023) we have reviewed how we can increase smart metering installations for household and non-household and have looked for ways to partner with households, retailers and developers to install and/or retrofit water efficient devices. We are confident that our range of feasible options are aligned with the Government's roadmap to water efficiency. We have developed a range of feasible leakage options and have considered how innovation could improve the cost effectiveness of future leakage	Our Technical Summary on demand management sets out how we will achieve the targest and how they align with Government's roadmap.

	reductions. Our revised plan sets out how we will meet the revised leakage targets (trajectory) of 16% by 2025, 20% by March 2027, and 30% by March 2032.	
South West Water has not presented preferred options for the Isles of Scilly, this is as the zone remains in surplus. However, as a result of this, the company has not demonstrated how it has considered government policy on demand for the Isles of Scilly. The plan does not demonstrate the company will reduce PCC to 110l/h/d nor reduce leakage to support a 50% reduction. The company should update its plan to ensure government policy is reflected in its plan for the Isles of Scilly.	We developed feasible demand side options for the IOS alongside or other WRZs, and as part of optimising our plan we have looked at the optimum way to achieve our overall government targets for both demand and leakage targets at both a WRZ and water company level. The PCC and leakage targets are set at company level, but we have also considered the feasibility of meeting these at a WRZ level.	Our Technical Summary on demand management demonstrates how we will achieve the targets. We have included water efficiency initiatives for the IoS in our preferred plan.
In its WRMP, South West Water has included adaptive pathways to mitigate against some of the risk resulting from its preferred plan. In its adaptive pathways, one reason the company would switch pathways is the demand management programme failing to deliver as anticipated. However, Chapter 7 outlines that this is also included in its headroom assessment. It is unclear how the company has avoided the double counting of this risk. The company should set out in its plan how it has avoided double counting of uncertainty.	For our revised plan we have revised our target headroom calculation and recalculated using a probabilistic model. We are following the UKWIR 2003 Improved Approach to Target Headroom methodology to produce target headroom allowance by resource zone. This represents the uncertainty in base line calculations as the actual supply and demand is likely to differ from our baseline forecasts. For our adaptive pathway we have considered the potential for changes to our most likely pathway that will have an impact greater than the target headroom applies and therefore trigger a different solution. We will continue to assess the uncertainty of demand management as an adaptive pathway and therefore we will not include any allowance for demand management options in our final target headroom allowance.	Please see section 10: Our Water Supply Plan in our main Technical Summary and Appendix 6 for more information.
In its WRMP, South West Water outlines that it used the framework Aecom developed for WRMP19 but reanalysed it and updated the data itself. However, it does not outline what types of re-analysis it has done and what data it has updated it with. Additionally, the company provides the detailed method it used in WRMP19 which contains the relative contribution of the headroom components. The company has not provided a new detailed method for headroom and has not provided information on the relative contribution of headroom components for WRMP24. The company also has not explained why there are some fairly significant headroom differences to WRMP19. The company should provide a more detailed method on what reanalysis it has done and how it has updated WRMP19 data sets. It should provide greater clarity on how each headroom component contributes to headroom and explain why headroom is so different in WRMP14 to WRMP19.	For our revised draft WRMP, we have recalculated target headroom. We have carried out sensitivity analysis on the target headroom components to assess the relative impact on the zonal target headroom allowance. We have provided greater detail in our revised plan on the methodology and the sensitivity of the calculation to the components.	Please see section 6.1: Target headroom: allowing for uncertainty in our main Technical Summary for more information.

The company refers to a number of reports which it has used or commissioned to help produce its WRMP. However, some of these reports are not present in the submission nor has a location for the report been provided. It is unclear whether these are deliberate omissions or whether it is an oversight. These reports are: · Chapter 3 – NHH Water Efficiency Strategy · Chapter 5 – Atkins report · Chapter 5 – HR Wallingford reports · Chapter 8 – KBS Costing report · Chapter 9 App 9.2 - Appendix A Screening Spreadsheet; Appendix B Proformas; Appendix C Final Household options; Appendix D Non-Household options We have sought clarification of this with the company during consultation. We understand that the company may not be able to publish all of the information on these reports for commercial confidentiality reasons. However, the company should make clear that a document is not part of the submission or provide the reports as part of its plan.	We will make available on request all supporting reports that have been used to support the creation of our demand-side options.	All supporting reports are listed in Appendix 5 and will be provided upon request.
Chapter 8 sets out the information for each of the supply side options the company has considered. However, the information for the river Yealm option appears to refer to the Erme. The company should correct the description of the river Yealm option.	Thank you for picking this up. The supply option description has been corrected.	Please see Appendix 4.1
Section 10.5 of the WRP guidance states "Customers, interested parties, and regulators should be able to understand how and why you have decided on your preferred programme and why you have discounted other solutions". The company's plan is a long list of appendices rather than a main report, meaning there is a lot switching between appendices, making it difficult to fully understand the plan. In addition, the BVI Excel workbook examples are not provided with plan. The company should review the structure of the plan to make it easier to navigate and for consultee to understand. The company should also provide the BVI work books reference in their Plan.	We have conducted further engagement sessions with the EA to better explain the programme and why certain options have ended up on the rejection list. We will expand on this in our supply options narrative. We have changed the structure of our WRMP to improve navigation.	Please see the revised Technical Summary and Appendix 5

ID Reference: 050	Historic England	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
It will be important for the dWRMP24 to reference the historic environment. While we acknowledge the importance of the natural environment in relation to the plan's content, there is nevertheless a risk that the historic environment has not been adequately considered. Historic England recommends that the dWRMP24 should include a few paragraphs summarising why the historic environment is important in the context of water resource planning and management, what steps have been taken so far to consider the historic environment and how proposals will need to take the historic environment into account going forward. We also consider that there is an opportunity to describe the characteristics and assets of the area such as landscapes and heritage. At present each of the Water Resource Zones is described solely from the perspective of water supply. We believe that this section would benefit from a description of the heritage resource of the area, including archaeology, coastal heritage, four World Heritage Sites within the wider Region, and a range of geologies and landscape character areas.	We also recognise the vital importance of protecting the historic environment, which has been taken into account in developing our Best Value Plan through the Strategic Environmental Assessment (SEA) process.	See Appendix 6 for our Best Value Plan and Appendic 7 for our Strategic Environmental Assessment
We support the principal of a best value plan, whereby decisions are made based not solely on cost but with consideration of other factors such as benefits to customers, the environment and society. However, the approach to decision making appears to view the environment only in terms of the natural environment. There is no explicit reference to the built, cultural, historic environment or heritage value and therefore it is not clear to what extent they have been considered. We are generally supportive of the strategic objectives of the dWRMP24, which include to 'nurture the environment', the focus seems to be mainly on the natural environment. To ensure that the conservation and enhancement of the historic environment is given due consideration, we believe that the strategic objectives and best value planning framework should explicitly refer to the historic environment. There is an opportunity to do so through the existing best value indices, including 'SEA qualitative option scores' and 'wider society'.	A Strategic Environmental Assessment (SEA) for each of the feasible options considered in the plan has been undertaken. The approach is appropriate to the development stage of the options and includes a range of specific assessments of the expected impacts on the man-made environment. The results inform the decision-making framework by providing a short and long term qualitative view of both positive and negative expected impacts. The categories of impact considered include: - enhancing tourism & recreation; - maintaining and enhancing the health & wellbeing of the local community (economic and social wellbeing); - conserving, protecting and enhancing the historic environment and landscape / townscape; - avoiding negative effects on built assets / infrastructure; - the impact of options on natural hazard regulation, i.e. the flood protection 'services' that natural capital assets provide to the man-made environment are also assessed and reflected in the decision-making framework.	Please see Appendix 2 on the SEA
Historic England acknowledges and supports the strong commitment within the South West Water dWRMP24 to secure environmental improvements. However, this aspect of the Plan has a strong focus on the natural environment but lacks recognition of the historic environment. For example,	Consideration relating to the influence of water management on the historic environment is captured within the Historic Environment SEA Objective (6). Additional baseline collection and assessment will be undertaken at a more detailed stage of option development to determine the additional effects on	Please see Appendix 2 on the SEA

Chapter 4 'Enhancing and protecting the environment' considers Environmental Destination, catchment management and sustainable abstraction amongst other things. The NPS highlights that 'Current levels of water abstraction from some sources will need to be reduced to protect the environment and help sustain important heritage assets'. We believe that the Plan would benefit from more explicit recognition of the influence of water management on the historic environment, recognising the potential impacts of abstraction on archaeology, paleoenvironmental remains, or water dependent heritage assets.	water dependent heritage assets and water sensitive historic environments. We have improved the level of detail provided in the SEA Report in relation to the assessments made for the historic environment.	
The plan refers to ongoing work by South West Water to restore uplands and moorlands, such as the Upstream Thinking catchment management programme, and to address abstractions in sensitive locations. There is potential for these initiatives to benefit the historic environment as well as the natural environment, for example, by safeguarding historic landscapes, as well as buried archaeology and paleoenvironmental remains in peatlands and other waterlogged environments.	We have worked closely with local historic environment specialists from County Councils and Historic England during the delivery of their peatland and mires restoration work for over 15 years. We recognise both the risks that peatland restoration and nature-based solutions that modify the water table can pose to the safeguarding of historic landscapes and take great care to ensure that these risks are correctly mitigated.	More information about our partnership work to protect and enhance the environment is available here: nature-based-solutions
The Regional group has identified 'focus catchments' (Dorset Stour, Poole Harbour, Bristol Avon, Tamar, and East Devon) in order to pilot a catchment based approach to environmental management. Within the Wimbleball area, an Environment Agency led focus on the lower Otter catchment is also mentioned. It will be important that resolving issues in the catchments identified is not at the expense of other sensitive environments or heritage. Indeed, this is explicitly acknowledged in Chapter 4 of the dWRMP24, which states that 'All the solutions proposed in the final plan must be demonstrated as sustainable (i.e. alternative abstractions are not causing deterioration), and the actions must not be disproportionately costly'.	We acknowledge the importance of adopting an integrated catchment approach and are fully committed to delivering a WRMP that meets the demand for water while also protecting and improving both the natural and historic environment. In creating our dWRMP24 we have taken care to comply with all SEA, Habitat Regulations, heritage, archaeological, landscape and other planning requirements, and consult with all statutory and interested parties for all and any site-specific schemes in an appropriate and proportionate manner as the schemes are planned and developed.	Please see information on integrated catchment management in Section 7 of our revised Technical Summary and Appendix 8 on Customer and Stakeholder Engagement.
More detail is required on certain proposals and their environmental impacts, to inform final option selection in advance of publication of the Plan. Where appropriate this should include heritage impact assessment. In relation to proposed increased abstraction at Hawks Tor Pit, more work is needed to highlight and assess the impact on Hawks Tor Pit Site of Special Scientific Interest (SSSI), an important palynological site for interpreting Late Quaternary environmental history, while the adjacent peatland of Bodmin Moor is also designated as an SSSI. In relation to the Mendips Quarry SRO, which includes an intake pipeline from Newton Meadows near Bath, it will be important to consider the potential impact of proposals on the spring catchments of the City of Bath World Heritage Site and the Great Spa Towns	Yes, we agree. We have provided these details in our revised DWMP and commit to working in partnership with relevant and interested organisations as site specific proposals are developed. An Environmental Management Plan has already been developed for the management of the Hawks Tor Pit, and we will ensure that this also includes a heritage impact assessment, where required, and careful consideration of the how the historic landscape will be managed going forward.	More information about our DWMP can be found here: drainage-and-wastewater-management-plan

of Europe World Heritage Site, and to be mindful of The County of Avon Act (1982).		
We particularly consider that additional information is required for several proposals. These are: ROA15 (Gatherley Phase 2), WIM5 (Effluent reuse from Dotton), and BNW17 (Cheddar 2 reservoir SRO). For all three schemes, more information is needed regarding the associated infrastructure and pipeline transfers. We have requested that South West Water provide GIS shapefiles for the proposed schemes and look forward to receiving these in due course.	We are keen to share the shape files with Historic England. These are now available and we will be in touch to discuss the most appropriate means of doing so.	This is not specifically covered in the WRMP documents but we will ensure this will happen.
The importance of the historic environment, and potential for plan proposals to impact on it, are not currently adequately reflected in the dWRMP24. We consider that further information is required on schemes, their impacts and specific mitigation in advance of publication of the final plan. Please contact us to discuss and issues and, in addition, we advise that the local authority's conservation and archaeology advisers should be closely involved throughout the preparation of these plans and proposals. They are best placed to advise on local historic environment issues and priorities, how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures and opportunities for securing wider benefits for the future conservation and management of heritage assets.	Thank you for your offer of future collaboration. We have worked closely with local historic environment specialists from, for example, County Councils and Historic England, over the last 15 years during the delivery of the peatland and mires restoration work. We will continue to collaborate closely with these local experts as we continue to develop and deliver our WRMP. It is important to us that we have considered and addressed the issues raised to your satisfaction before we publish our final WRMP.	Please see Appendix 8 on Customer and Stakeholder Engagement.

ID Reference: 067	**Natural England**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
In Natural England's view South West Water's draft Water's Water Resources Management Plan (dWRMP) should be amended to include a pathway to meet the Company's nature recovery obligations in so far as they are relevant to the supply demand balance set out in the dWRMP.	We are confident that our revised draft WRMP will fully comply with all our legal obligations to protect the environment, achieve drought resilience and meet government requirements to achieve leakage and consumption reduction targets.	Please see our Technical Summary on demand management
We note and support the array of demand-side measures proposed in the dWRMP. Demand management interventions should be timetabled from as early as possible in the plan to meet the objectives, policies and timetables for	The timings of our demand-side measures have been reviewed and updated in the revised draft WRMP.	Please see our Technical Summary on demand management and

nature recovery. The assessments requested above should be used to inform the scale and speed of any further reductions required.		Appendix 5 on Demand Options
Natural England welcomes that the SEA recognises climate change in terms of its impact on rainfall and evaporation patterns, and in turn the resilience and recovery of water dependent environments. We do however note that whilst nature-based solutions have been considered as part of the wider Environmental Destination of the Plan, the Preferred Plan options largely employ hard engineering solutions. Nature-based solutions can provide a multitude of environmental benefits and can help to support catchment resilience to climate change. We would welcome further detail of the site-specific and catchment focused nature-based solutions South West Water plan to incorporate into their WRMP.	Our preferred plan prioritises, wherever possible, green and nature-based solutions over grey engineered options. This may not have been clear in our dWRMP24 so we are reviewing and clarifying this position for the final WRMP.	Please see section 7.6 of our Technical Summary
Natural England is concerned that neither the Environmental Destination set out in the South West Water dWRMP or the West Country Water Resources Regional Plan are sufficiently robust with demonstrable deliverability to ensure compliance with the Water Company environmental obligations. Where a Water Company is relying on the Environmental Destination of the relevant Regional Plan it should satisfy itself that these environmental obligations are met. In Natural England's view, the South West Water dWRMP as currently written should be amended to address these shortcomings.	Thank you for your feedback on this – we hope we have improved how our Environmental Destination is described in the revised draft plan. Furthermore, to meet this challenge we have also re-worked our Environmental Destination and the supply baseline and forecast of which it forms a key part. In addition, work is underway to review and improve the way that the Environmental Destination is described in both our Drought Plan and the Regional Plan.	Please see section 5.4 in the Technical Summary and more detail is in Appendix 1 on Supply Forecasting and Appendix 4 on Supply Options. Our Drought Plan is available here: drought-plan Appendix 9 has more information on the lessons from the 2022 drought. Ore information about the WCWRG Regional Plan is here.
We are concerned that the Environmental Destination as defined in the Regional Plan does not go far enough or fast enough to meet the nature recovery obligations. We require further detail regarding the proposed options, trigger points and timescales to determine whether the dWRMP goes far enough, fast enough, and whether it is prioritised in the correct locations to meet the nature recovery obligations. We appreciate that the assessment we are requesting is complex, and that it needs to involve other Competent Authorities, stakeholders and partners. We also recognise that PR24 WINEP	Thank you for your feedback. We take our statutory duties in relation to the protection and improvement of designated sites, biodiversity and nature recovery very seriously. This is reflected in our new Biodiversity Strategy and Environmental Enhancement Cases that will form key elements of our PR24 Business Plan. We will ensure that our revised dWRMP24 contain further details on the proposed options and timescales for this work.	Our Biodiversity Strategy is available here: biodiversity-strategy

provides an opportunity for companies to further investigate the above obligations in terms of their Environmental Destination. However, established problems with designated sites should be addressed as a matter of urgency.		
Species obligations and newer obligations from the Environmental Improvement Plan should also be included within the Environmental Destination.	We hope we have addressed this in our revised draft WRMP.	Please see section 5.4 in the Technical Summary
Natural England welcomes and recognises the intention of the dWRMP to explore nature-based solutions, promote ongoing stakeholder engagement and catchment based innovations to help achieve the Environmental Destination. However, with the exception of the established 'Upstream Thinking' project, these schemes are at such a nascent stage with no definite timeframe for impact, so it is difficult to agree that they can be definitively relied upon to help deliver the abstraction reduction, resilience to climate change and prioritisation of the most vulnerable and protected sites required to achieve the Environmental Destination.	We are fully committed to exploring the potential of NBS to deliver water resources and resilience outcomes but are also very aware that further evidence is required if we are to robustly include them as options in our WRMP. Water companies are required to identify integrated catchment- and nature-based solutions in their WRMPs. It is also recommended that water companies deliver these measures at a catchment scale, either working solely or in partnership with other catchment-based organisations. We have incorporated a significant programme of catchment management and nature-based solutions for water resources and resilience benefits into our PR24 Business Plan and the accompanying Long Term Delivery Strategy. These investments will primarily be delivered under the auspices of the collaborative Upstream Thinking scheme, but also via the wider natural resources investment programme (e.g. peatland restoration). In addition, a WINEP investigation to evaluate the water resources benefits of catchment management is also planned in AMP8, and to expediate the mainstreaming of catchment and NBS for water resources outcomes we have secured £1m funding from the Ofwat Innovation Fund to deliver the Water Net Gain project, which will undertake research into farm business and water supply resilience across the region.	More information on the environmental protection and improvement schemes we are working on in a range of partnerships is available at: nature-based-solutions
Natural England notes that the Plan does not appear to give explicit consideration to the assessment of how much water is needed to support the adaption of wildlife to climate change, ensuring enough water is retained in the environment (groundwater and rivers) to restore or maintain favourable condition of protected sites, species and priority habitats. Furthermore, South West Water should consider within its assessment of water requirements, the need to wet peat to help achieve the objectives of the England Peat Action Plan.	We have been investing in peatland restoration projects for nearly 20-years and have worked throughout that time with research and delivery partners to assess the water resources outcomes and secondary co-benefits this work, and other catchment and nature-based solutions, can realise. More recently we have established the South West Peatland Partnership, which is delivering peatland restoration on Exmoor, Dartmoor and Bodmin Moor, and have become partners in the newly formed Dorset peatland partnership. We have recently refreshed our Biodiversity Strategy and have included a significant natural resources programme (biodiversity, water resources, fish and eels, INNS, Local Nature Recovery) in our PR24 Business Plan and the PR24 WINEP.	More information on the environmental protection and improvement schemes we are working on in a range of partnerships is available here. Out biodiversity strategy is here: biodiversity-strategy

We recognise that supply-demand assessments within the Regional Plan and dWRMP have utilised national Environment Agency modelling outputs. However, we cannot see how these ensure sufficient water within anything other than very long, multi-decadal timeframes to meet the SAC conservation objectives.	We have reviewed the need to introduce licence caps in the short term and are continuing to develop our understanding of longer terms needs with the Environment Agency. This will lead to a greater reduction in abstraction from sensitive sources earlier than indicated in the draft plan.	Please section 5.4 in our Technical Summary
Natural England requires further information in order to determine the significance of the impacts on the River Avon, the scope for mitigation, and if appropriate, compensatory measures. Without this, Natural England may need to object to the plan. South West Water over-abstracts more than 100 million litres per day from two abstraction points on the Lower Avon as outlined in its dWRMP. South West Water's dWRMP was relatively transparent on the amounts it must reduce with an estimated timeline for completion to achieve sustainable levels of abstraction across its supply area. However, there was very little information on how these reductions had been quantified. South West Water has failed to provide examples of where the water will be sourced from to allow these reductions to be made. For its final plan, South West Water must provide a comprehensive list of new sources it will invest in - to be able to make these reductions. If South West Water is relying on a reduction in demand from business and personal use this needs to be clearly quantified and specified. It will take a variety of different water supply sources to cover a 100 Ml/d reduction in abstraction on the Lower Avon. Please include this information within the plan and reconsult Natural England before it is published. We note for instance that supply options in the dWRMP to address potentially a c100 Ml/d deficit on the lower Avon are overwhelmingly reliant on the Regional Plan. Of all the supply options taken forward in the dWRMP for the Bournemouth Water area, only 5Ml/d of yield appears to be reasonably secure for the company to rely on in the short term (by 2030), and these options do not appear to provide much flexibility for abstraction reduction on the River Avon SAC.	We have been working closely with yourselves and our other regulators since the publication of the dWRMP24 for consultation in February 2023 to review and revise our plans to achieve sustainable abstraction on the Hampshire Avon and Dorset Stour over the short and long-term. We have provided a more comprehensive account of this plan in our revised dWRMP24 that includes the information you have requested relating to the timing of these measures and how the environmental risks will be mitigated.	Please see Appendix 6.
Further supply options need to be brought forward (for example effluent re-use via environmental buffers) to robustly address the situation on the River Avon SAC and elsewhere in the future for the restoration of non-European SSSI rivers and wetland SSSIs and priority wetland habitats. They need to demonstrate deliverability in timeframes that meet government targets and commitments in the Environmental Improvement Plan (EIP).	We've introduced approximately 50 additional supply options since publishing our drought plan to give us more resilient water supplies. We will provide the opportunity to consult on these additional options within our revised WRMP24 in October.	Please see Appendix 4 and Appendix 6
We welcome South West Water's consideration of nature-based solutions (including their emerging '1000 Ponds' programme) however we require further detail to understand the scope of their proposed impacts on the Plan's Environmental Destination. We would welcome further, site-specific detail of	As described above, we are fully committed to exploring the potential of NBS to deliver water resources and resilience outcomes but are also very aware that further evidence is required if we are to robustly include them as options in our WRMP. We have provided more detail on our approach to using NBS	Please see section 7 of our Technical Summary

proposed solutions, and a greater understanding of how they interact with the proposed supply options to increase catchment resilience.	and catchment management solutions to deliver water resources outcomes in our revised WRMP.	
A transparent assessment of the scale of water efficiency or other measures which would be necessary to achieve a water yield that would remove the need for increased abstraction on the Avon is required. A description of the options, which could include water efficiency in new and existing development, to enable reduction of recent actual abstraction, as far as this is possible, so that the existing adverse effects are minimised or potentially removed before long-term additional supply provision. An assessment of how far options for water efficiency, water supply or other measures can be implemented to remove adverse effects in time to meet the objectives for nature recovery in the Environment Act 2021 and Environmental Improvement Plan 2023 is necessary.	A range of additional demand side options have been developed for all zones to enable our revised scenario modelling methodology to undertake a detailed exploration of different ways to manage the supply/demand deficit in future years. Multiple scenarios and our revised best value framework explore the various different approaches to solving the deficit challenge in a fully quantified way. This has enabled us to present a fully supported discussion of the best approach.	For more information, please see Appendix 6: Best Value Planning Approach and Methodology
The HRA describes the new Gatherley option as the upgrade and dualling of the existing raw water trunk main between Roadford reservoir and the River Lyd. It is noted as a key option and is included in the Adaptive Strategy. Currently, the draft HRA screening only considers some downstream impacts from the option, and concludes that the new intake will result in no likely significant effects on the integrity of either Plymouth Sound and Estuaries SAC or the Tamar Estuaries Complex SPA. It is the opinion of Natural England that there is insufficient evidence presented within the HRA to support this conclusion and that no in-combination or cumulative assessment has been conducted. We note that no assessment has been made on the implications of reduced flow to migratory fish. Formal assessment should also consider the potential implications from future asset changes downstream (Gunnislake), which may increase the upstream habitat reach for migratory fish. We additionally advise that Dartmoor SAC should be screened into the HRA in relation to this option. Atlantic Salmon is a feature of Dartmoor SAC, which in part uses the River Tamar to migrate upstream, something which has not been identified within the HRA screening for this option. The potential for increased abstraction to impact on the freshwater dependent features of Dartmoor SAC should also be considered.	As part of the planning application for the new Gatherley scheme, an EIA screening, which includes HRA, has been produced for consultation. Also, as part of the new abstraction licence application, detailed hydrological modelling has been completed which will be included in the EIR. We will ensure that our SEA contractor (Mott Macdonald) will have this up to date information for the WRMP.	Please see Appendix 4.1 and Appendix 4.2
The West Country Regional Plan (WCRP) details a planned new abstraction on the Tamar at Gatherley, supplemented with “a small abstraction from the River Thrushel / Lyd mainly for water quality reasons”. From the description of this option, we question why South West Water have not detailed the full scope of the Gatherley scheme in their report. Should these schemes be standalone, this omission further highlights the needs for a full, in-	We have no plans to use the old abstraction site on the River Thrushel. The River Lyd at Lifton was recently granted a new permanent abstraction licence.	The Lyd is now part of the baseline. – please see Appendix 3 on Headroom, Baseline and Challenges. Phase 1

combination assessment of existing and planned abstractions and other options within the Tamar catchment, and a consideration of how the dWRMP interacts with and delivers the Environmental Destination outlined in the WCRP.		delivery of the Gatherley scheme is part of the current Green Recovery programme.
The option to bring Hawks Tor Pit online as a new water source supplying Colliford reservoir was subject to a drought permit in 2022 and is part of the Preferred Plan. We note that no in-combination assessment has been conducted for this option, despite being included within the preferred plan.	We are investigating the feasibility of making the Hawks Tor Pit a permanent resource during AMP7. Environmental analysis will be undertaken as part of that work.	As this is being undertaken in AMP7, the Environmental Assessment is not applicable to the WRMP.
The HRA assesses a number of undefined supply side options on the Isles of Scilly. At present, the lack of specificity in the option – no exact geographic location, no operation or construction dates, no details regarding abstraction levels – allows for no meaningful HRA assessment to be completed. Once detail of the proposed groundwater and desalination schemes are known, the HRA should be updated to assess the potential impacts to integrity of the relevant sites. We do advise however that the relevant Isles of Scilly Marine Conservation Zones (MCZ) are screened into the assessments, especially pertinent for desalination options.	We agree with your comments. We recognise the lack of necessary details for the Isles of Scilly. We have been working with key stakeholders to develop a long term supply strategy and more details on the approach are provided in the revised WRMP. Marine Conservation Zones will be taken into account when we are developing options and undertaking environmental assessments.	See sections 6.3.7 and 10.4.5 for specific information on the Isles of Scilly.
To support the SEA of the dWRMP, South West Water has conducted an INNS risk assessment of supply-side options. Of the options which proceeded to level 2 assessment, the following Preferred Plan and Adaptive Strategy schemes demonstrated a moderate to high risk of INNS movement at a number of sites. This report ultimately concludes that due to a lack of detailed Plan information at the time of writing, a further, more detailed INNS risk assessment should be carried out for those options which are taken forward into the report. Natural England second this recommendation, and query how South West Water will adapt their optioneering or plan delivery should the secondary assessments demonstrate a high risk of ecological harm through the spreading of INNS.	The INNS risk assessment has been updated with additional information as the option development progressed through Spring 2023. Further studies will be undertaken where needed, and options and mitigation measures will remain under review. We are prepared to adapt the delivery of our plan if high INNS risk is identified in the future. We regularly monitor INNS.	More information about our work on INNS is available here: protecting-habitats
Natural England recognise that South West Water has detailed their 'Adaptive Strategy' in Chapter 11 of the dWRMP. We welcome the 'decision/trigger' approach which ensures that action can be taken promptly in response to changes in circumstance, notably supply-demand management associated with Environmental Destination. Natural England advise that it is also essential for this adaptive strategy to consider delays to planned option delivery as part of the decision/trigger approach. This is especially pertinent where the deployment of Preferred Plan options relies on the outcomes of WINEP investigations.	Thank you for this feedback. Our adaptive plan takes the risk of delays to planned option delivery into account and we will ensure this approach is explained more clearly in our revised WRMP.	Please see section 8 of our Technical Summary on our decision-making processes and approach to adaptive planning. Appendix 6 sets out our approach to

		planning for Best Value.
Natural England advise that the dWRMP should more explicitly outline where supply options are planned to be implemented as part of AMP7, and do not make up the Preferred or Adaptive plans.	This has been updated in the revised plan. Options that have been accelerated into AMP7 will also be detailed in our next Annual Report.	Please see Appendix 4.3 and Appendix 6
Chapter 4 of the dWRMP notes the current development of WINEP24 options, which will aim to investigate the level of sustainable abstraction possible across a number of supply locations. Natural England anticipates that these studies will inform option development of subsequent plans.	Thank you. Yes, agreed.	Please see Appendix 4
We also note that there are multiple options which use headroom in existing licences. Though these make use of what has previously been permitted, this does result in a net increase in abstraction. This is not in line with environmental ambitions to reduce abstraction and leave more water in the environment for wildlife.	We are fully committed to complying with our statutory duties in relation to protecting the environment and will work closely with NE and our other regulators to develop our plans. We acknowledge your feedback on this point and will provide a clear explanation of this in our revised draft WRMP.	Please see section 5.4 of the Technical Summary on Sustainable Abstraction

ID Reference: 012	**New Forest National Park Authority**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
The Plan sets out South West Water's aim to address abstractions at sensitive locations to protect river flows and wildlife in rivers and reservoirs, particularly relevant to the River Avon on the western edge of the National Park. Reducing abstraction from the Avon is a key driver behind the Plan.	Thank you. Protecting sensitive and environmentally designated sites is of vital importance which is why we are proposing abstraction capping in such sites.	Please see section 5.4 of the Technical Summary on Sustainable Abstraction
The draft Plan sets a target to reduce leakage - targeting a 50% reduction by 2050. Given the climate emergency, this does not seem very ambitious. The scale of water lost through leakage dwarfs all the other water saving initiatives set out in the Plan. A 50% reduction of over 64 million litres per day is far in excess of water savings through metering and water efficiency measures estimated to deliver savings of 1.6 million litres per day by 2030 and 48.65 million litres per day by 2050 – well below what would be achieved by addressing leakage. The timeframes for halving leakage should therefore be brought forward to 2030 and is particularly important in the Hampshire Avon catchment where there are water abstraction and supply issues.	We are considering the feasibility of outperforming on leakage and delivering reductions before 2050 and other demand management activities that will help us reduce our abstraction on the Avon.	Our Technical Summary and Appendix 2 – part 4 discusses leakage in detail.

A long-term per capita consumption target of 110 l/p/d by 2050, with an intermediate target of 120 l/p/d by 2037, is not considered ambitious given the climate emergency. The adopted New Forest National Park Local Plan (2019) requires new development in the National Park area to achieve the optional higher Building Regulations water use standard of 110 litres per person per day. Across South Hampshire other local planning authorities adopt a similar requirement, already enabled by Building Regulations.	We support this approach to water efficiency and we continue to engage with our customers to promote water efficiency measures. We are also discussing water efficiency policies with the EA.	Our Technical Summary and Appendix 2 – part 4 discusses leakage in detail.
The draft Plan highlights that no suitable sites have been identified for a potential reservoir in the Bournemouth Water supply area. However, the adopted Hampshire Minerals & Waste Local Plan (2013) identifies several sites for gravel extraction in the Avon Valley and it is likely that additional extraction sites will be identified north of Ringwood when this Plan is reviewed. Previous minerals extraction sites in the Avon Valley have been restored as lakes so SWW may wish to discuss the potential after uses of the existing and proposed gravel extraction sites in the Avon Valley with Hampshire County Council as the relevant minerals & waste planning authority.	We have developed a range of supply options and continue to identify new opportunities. Our option appraisal process means that we discount some options throughout the process as we undertake environmental and engineering assessments. However, our aim is always to capture every possible option we can. We continue to engage with our stakeholders and customers on options and will use this feedback to shape our plan-choices.	Please see Appendix 4: sections 3 and 4
The option proposed for Lymington is within New Forest National Park and close to a range of designated nature conservation sites. Therefore we encourage South West Water to engage with the Authority regarding any proposals that could require planning permission or have the potential for impacts on designated sites.	One of the important steps in progressing our supply option schemes is to understand the environmental impact of the solution. To ensure we understand the impact we will undertake a strategic environmental assessment and engage with the New Forest National Park Authority once we proceed with a planning application for this option, and throughout the detailed design phase.	Please see Appendix 4: section 5 and Appendix 7

ID Reference: 058 **Ofwat**

Feedback	South West Water Response	For more detail in our revised WRMP
Overall, there are some areas of South West Water's plan that are in line with our expectations for this stage of a draft WRMP. In particular, it delivers on expectations by: • setting out the drivers behind the water resource challenges faced across the planning horizon, and the drivers influence on the supply demand balance; • undertaking an optioneering process with an appropriate number and range of feasible options.	Thank you for this feedback.	N/A

In its final WRMP, South West Water should ensure continuity between WRMP19 and WRMP24 and explain the reasons for any step changes. There is currently limited discussion of what has changed, particularly around step changes in supply demand balance components since WRMP19. There must be evidence links between the West Country Water Resources regional plan, and how this has influenced South West Water's best value plan, as the timing of these processes have been misaligned at the draft stage;	We have included further commentary on the changes between WRMP19 and WRMP24 in our revised WRMP, including the reasons for any step changes. We will ensure consistency between SWW's best value plan and the West Country Water Resources Group regional plan.	Information about how we are working within the WCWRG is found here.
You must detail the options screening process. The draft plan does not set out the methodology and criteria used to screen options between the unconstrained and feasible list, or detail reasons why any unconstrained options have been screened out. This will provide confidence that the feasible list contains best value options;	We have provided a comprehensive discussion on our option screening process within our supply and demand options chapters as part of our revised WRMP24.	Please see Appendix 4
The water resources modelling capacity should be improved for the final WRMP24 to allow a full stochastic assessment to be undertaken, in line with stochastic approaches set out in the water resources planning guidelines (WRPG);	Our stochastic assessments are ongoing, and we will develop our models ahead of WRMP29 to enable us to complete a full assessment.	Please see section 11.4 (our roadmap to WRMP24) in our main Technical Summary
A full preferred plan for the Isles of Scilly must be presented. We expect the company to clearly set out in its statement of response what the selected preferred plan is, and demonstrate that is selected from the options and strategies discussed in the draft stage and therefore had the opportunity to be consulted on.	We have developed a preferred plan and re-consult on this with Isles of Scilly stakeholders. A preferred plan for the Isles of Scilly is part of our final submission.	Please see section 10.4.5 (Isles of Scilly WRZ) in our main Technical Summary.
A core pathway in line with the WRPG definition should be presented that includes low-regret investment to meet future uncertainties and allow further flexibility in the future.	Our Best Value Plan narrative has been updated in the revised WRMP24 with a comprehensive decision methodology. As part of this, we have provided a fully developed core-plan.	Please see section 10.2: preferred plan in our main Technical Summary and Appendix 6:
Robust and clear supporting evidence must be provided for the data tables. We are concerned about the level of detail and accuracy applied to WRMP tables, which often had incomplete and resubmitted data.	We have updated our data tables in our final plan to ensure these are accurate and provide clear supporting evidence.	Our data tables are published on our WRMP webpage here.
Water companies must act to reduce demand for water in a way that represents value for money in the long-term. This means Ofwat expect companies to use their WRMPs to adhere to demand targets including: • halving leakage across the industry by 2050, in comparison to 2017-18 levels;	We look at all demand management options in terms of their costs and benefits to ensure that our initiatives deliver best value outcomes. Our plan is based on meeting these targets and we are exploring opportunities so that we can better / out-perform these.	Please see Appendix 5: Flow regulators are now included as a feasible option and

• reduce dry year annual average per capita consumption (PCC) to 110 litres per head per day (l/h/d) by 2050.		part of our preferred plan.
A further target is now set in the Environmental Targets (Water) (England) Regulations 20234 for the reduction of potable water supplied by water undertakers in England to people in England. This is that the volume supplied per day per head of population is at least 20% lower than the 2019-20 baseline by 31 March 2038. We expect companies to demonstrate how they will deliver against this target in their final WRMP.	Our revised draft plan includes significantly greater demand management reductions and includes an assessment of how we can achieve this further 20% target as part of our decision making process.	Please see the Technical Summary on demand management
We welcome that South West Water plans to reduce leakage by 50% by 2050. The company also indicates it will deliver a PCC of 110 l/h/d by 2050. The company's final WRMP should reference the target to reduce distribution input by 20% by 2037-38 and demonstrate how it plans to deliver this through a combination of reductions in the key demand components, leakage, household consumption and non-household consumption.	We have set out our overall demand strategy in our final submission, and shown how we have optimised our plan against the above targets.	Please see the Technical Summary on demand management
We welcome the fact that the company has tested different target profiles such as achieving water consumption and leakage reductions via linear and front- or back-loaded delivery profiles. Although the differences between the profile scenarios are presented, the cost differences between delivery programmes is missing for achieving PCC. The final WRMP should provide sufficient and convincing evidence on why the company selected its preferred strategy by clearly showing the costs and water savings per price control period for each scenario. This explanation and comparison should be clearly set out in the final WRMP. We also welcome that various metering strategies have been presented including the costs and benefits of delivering different meter technologies.	Our final submission sets out a more comprehensive summary of the costs, scope and initiatives that underpin delivery of our demand management activities towards achieving or exceeding our targets on leakage and PCC and the different profiles we have evaluated in producing our delivery plans. Our best value framework considers the financial cost, carbon and environmental impacts from building new assets, against the level of resilience each option provides, and the value our customers place on avoiding drought restrictions and water conservation from reducing leakage or reducing consumption.	Our Demand Management Plan is in Section 9 of our main Technical Summary. Please see section 8: our decision making process of our main Technical Summary for our Best Value framework. For more information, please see Appendix 6: Best Value Planning Approach and Methodology
The choice of meter technology and the reasoning, based on the programme level costs and benefits, needs to be clearly explained with sufficient and convincing evidence in the final WRMP. Although different timescales for meter rollout are assessed, it is unclear which delivery profile is selected and the reasons why. This also includes how the metering strategy aligns and supports the selection of PCC and leakage profiles for which there is expected to be significant interactions.	We have developed a comprehensive range of meter options. These cover the full range of selective metering options (Optants, change of occupancy, dual billing, compulsory) and a range of meter-upgrade options over differing timescales. The option summaries set out the contribution that each metering option makes to both consumption and leakage savings. We have set out, as part of our decision-making process, why the chosen metering strategy is "best value".	For more information, please see Appendix 5 and 5.1 which contain a comprehensive summary of all metering options. Also see Appendix 6: Best Value Planning

		Approach and Methodology
The company states that it intends and forecasts to deliver its PR19 leakage performance commitment level. However, we are concerned that the company does not forecast to deliver its performance levels for PCC by 2024-25. We expect the company to deliver its PR19 and WRMP19 targets. Companies should not expect additional customer funding to address deficits resulting from under delivery in the current or previous periods. We expect the company to review its proposals in these areas for its final WRMP.	In line with our WRMP19 'forward look', we are making further additional investment in AMP7 targeting leakage and water efficiency. Despite this investment we are not forecasting to meet PCC for the end of AMP7. We recognise Ofwat's concerns but we must also include an accurate baseline demand forecast in our WRMP24, in-line with EA guidance, to ensure future customer water supplies are protected.	Please see section 4: Demand forecast, section 5: our Supply-Demand Baseline and section 9: our Demand Management Plan in our main Technical Summary for more information.
South West Water's draft WRMP presents a 2029-30 business demand level that is 1.3% higher than the 2019-20 baseline level. This is as a result of a higher business demand level in 2025-26 than expected in WRMP19 with the company then expecting moderate reductions within the 2025-30 period. We have previously highlighted the opportunity for companies to deliver business demand reductions and our expectations for WRMP24 are that companies deliver significantly improved levels of water efficiency in the business sector. We expect the company to set out and clearly justify an ambitious strategy for non-household demand reduction in its final WRMP to inform its PR24 business plan. We also expect the company to explain how any revisions it makes to its non-household consumption trend have impacted the optimisation and best value option selection in its preferred plan.	We note your comments and have optimised our demand-side options. Our revised plan will have greater ambition in achieving business demand reductions.	Please see the Technical Summary on demand management
The data provided indicates that the company is proposing a three year average PCC reduction over the 2025-30 period that will deliver a level of PCC only 2.5% below the 2019-20 baseline by 2029-30. This represents an increase of 3.7% above the company's 2024-25 performance commitment level. As the company further develops its forecast PCC performance trend from draft WRMP to final WRMP it should consider more ambition in this area and include the reasons for changes and explain the impact of any revisions on the optimisation and best value option selection in its preferred plan. We expect the company to provide sufficient and convincing evidence in its final WRMP to justify why its selected targets for demand reduction represents the best value approach to meeting a supply-demand balance or delivering long-term strategic outcomes.	Our revised WRMP includes significantly greater demand management activity for both HH and NHH. Our decision-making approach and how these revised demand-side targets has impacted our best value selection are covered in the Technical Appendix.	Please see the Technical Summary on demand management. Please also see Part 8 on decision-making.
The company's plan considers a reasonable range of leakage profiles. It appears that a linear profile was chosen of the scenarios tested. Some information is provided on costs/benefits of each, but sufficient and convincing evidence of why this profile is optimal from a timing of investment perspective. This is particularly important given the preference to deliver	Our revised WRMP provides a comprehensive summary of all leakage scenarios analysed, together with the different goals and objectives set for each scenario developed. These scenarios have been used as an input into an over-arching decision making process to ensure we meet all Government	Please see Appendix 6.1 on leakage scenarios and optimisation.

high-cost mains renewals to meet the relatively early reductions proposed for 2025-30. It is unclear why the options selected for the chosen glidepath are optimal over alternatives and why the leakage reduction activities and their scale have been selected. It is unclear how the insights from delivering a range of operational activities undertaken since 2021 as part of the leakage recovery plan has informed the options list and selected leakage reduction programme. These activities, if proven to be effective, may offer cost-effective solutions going forward. In the final WRMP, you should present sufficient and convincing evidence why the activities for the selected glidepath are long-term best value. You discuss your current approach to customer supply pipe leakage and repairs to customer supply pipes but do not clearly articulate your position and proposals for the WRMP. The draft plan has insufficient evidence to support the effectiveness of repair subsidies to reduce repair times and thus further reduce leakage. You say you will revisit this for the revised draft plan submitted with the statement of response, and as such this option is excluded from the feasible option list. This appears inconsistent with the submissions and evidence submitted for the accelerated infrastructure delivery project. You should ensure that the submitted evidence and decisions is consistent in the final WRMP and accelerated delivery final decisions. The impacts of including this scheme on the WRMP and other options should be clear and supported with sufficient and convincing evidence.	targets as well as our supply-demand balance needs across the planning period.	
We are encouraging a common industry approach to addressing leakage on customers own pipes. We expect a view on the benefits of a common industry approach in your statement of response and final WRMPs. We will support companies in the development of a common approach but expect the industry to lead on the development.	We are supportive of developing a common industry approach to customer supply pipe leakage across both the HH and NHH market. As part of our drought response in driving water-conservation we have worked hard to tackle underground supply pipes losses (USPL) in both the HH and NHH market. Our current approach, following the issuing of a Waste Notice (Section 75), is to work with our customers to encourage timely repairs, and we do offer a subsidised repair / replacement policy for HHs. A common approach to customer side leakage may be challenging, because every region will have different socio-economic factors (rural / urban split of properties), differing levels of water-scarcity, which ultimately drives different policy decisions. Customer awareness of the value of water is a key to driving leakage reductions in this area. Offering additional subsidies to customers to repair their customer supply pipes quicker has been a valuable drought-response when water has been scarce. However, a free supply pipe repair policy has a significantly higher average incremental cost than other leakage-interventions. The key to any standard approach will be to develop a policy that reflects the variation in engineering and therefore cost of each repair, and balances this with the size and scale of leak. Adoption of Household Service	We have included content on this in the Demand Management part of the revised Technical Summary

	Pipes may also be another option worth considering – the shift in "ownership" may drive improvements in identification and repair times but would increase customer bills.	
The Water UK leakage route map to 2050 committed to an informed debate on customer supply pipe strategy by December 2022. The company chooses several option types with high cost and low benefit for the near term (including for 2025-30). This includes mains renewals and DMA sub-division. This results in a leakage reduction enhancement expenditure unit cost of 30.9 £m/Ml/d for the 2025-30 period. This unit cost is significantly higher than leakage reduction unit costs allowed at PR19 and those presented by other companies for PR24. There is likely to be scope for it to deliver more through active leakage control and pressure management. The draft WRMP already explains how these activities have been key to achieving recent reductions, but the strategy does not make full use of these going forward. We expect the company to review its leakage reduction proposals and provide sufficient and convincing evidence it is presenting a best value solution based on efficient activity costs.	We have carried out further optimisation of our leakage strategy, as part of our wider demand side strategy. Many of our leakage options have non-linear costs and benefits. We have therefore looked to utilise the most cost-benefit options in the early years of the plan. As part of our revised plan, we have tested a wider range of leakage, metering and demand side options, to inform the most cost beneficial plan.	Please see Appendix 6.1 on leakage scenarios and optimisation.
You present six high level metering scenarios based on proactive replacements of current meter stock with AMI (advanced metering infrastructure) meters by 2035 at the latest as well as a mix of optional/compulsory metering for unmetered properties. We note that additional costs for system upgrades are necessary to facilitate data management. These were not included in the draft WRMP with a full metering strategy being under development to inform PR24. We are concerned that the strategy has been presented with incomplete cost data. You need to provide sufficient and convincing evidence that the unit costs of AMI meter installations are efficient when compared to PR19 unit costs and current industry outturn, and clearly present any changes in the strategy as a result of updated data in the final plan. The impact of metering on leakage and consumption is quantified, but the interaction between metering options and the PCC and leakage glidepaths as well as leakage and consumption interventions are not explored. This results in a potential disjoint in investments attempting to achieve different outcomes at different timescales. You should present sufficient and convincing evidence to explain this in the final plan. The decision-making process identifying how outputs from models and optimisation tools are developed into recommendations for executive team and Board sign-off is not clearly explained so you should provide further detail of this decision-making framework, as well as sufficient and convincing evidence to justify why the preferred metering option is best value from a technology and timing of investment perspective.	We have carried out a comprehensive review of the unit costs and benefits of our leakage options. These have been based on our current metering contract, industry benchmarked, and are fully inclusive of all system-enabling costs and costs for smart infrastructure. We are undertaking a comprehensive optimisation across all feasible demand and supply side options to inform our core, best value, and other plan alternatives. Our analysis and programme appraisal is set out in our updated appendix "developing our best value plan"	For more information, please see Appendix 6: Best Value Planning Approach and Methodology

A robust assessment of current and future water needs is critical as it drives the gap between supply and demand and therefore drives the scale of investment required for the 2025-30 period and beyond. The company's supply demand balance starting point for the draft WRMP24 is significantly lower than its forecast for the same point in the final WRMP19. The reduction in available water for 2025-26 is equivalent to 16% of company water demand (distribution input). Although some of the changes are due to supply-demand balance reporting updates, there is still insufficient evidence to understand changes in some areas. In some areas, the evidence suggests that non-delivery or underperformance is the cause. We are concerned about the company not meeting expected WRMP19 PCC levels and the resultant higher household demand forecasts (representing a 19% increase). We also identify increases to non-household demand, target headroom and process losses (50% increase caused by late delivery of PR19 funded schemes). This means that there are significant concerns whether the overall outcome of the WRMP19 as funded at PR19 has been delivered in the round. The company should fully quantify and justify the reasoning for changes between WRMP19 and the starting point for WRMP24 at a supply-demand balance component level with sufficient and convincing evidence.	We have provided additional detail in the revised plan to explain the changes from WRMP19 to WRMP24 for PCC, non-household demand, target headroom and process losses. We have also made changes to supply-demand balance components for our revised plan and include an explanation of these. The WRMP19 PCC target has been rebased using a 2019/20 base year that has been uplifted to account for the impact of the COVID-19 pandemic on customers. Post-COVID water use behaviour is still 'normalising'. The COVID-19 restrictions meant people worked and studied from home far more, travelled abroad far less and consequently domestic water use such as toilet use and showering increased. We are still seeing the long-term trends vary as people return to the office/work locations. Hybrid working is well integrated, and although people are now able to travel abroad, the previous restrictions might have permanently changed holiday choices for some people. In addition, the recent increase in utility bills might be restricting people to 'staycation' in the South West. The change in water use behaviour has driven a difference between forecast and actual, making it increasingly more difficult to return to pre-COVID PCC levels and achieve the WMP19 projections. We are continuing to deliver water efficiency initiatives to both household and household customers and our WRMP24 long term plan is to achieve the Government policy requirements on demand reduction.	Please see section 4: Demand forecast, section 5: our Supply-Demand Baseline and section 9: our Demand Management Plan in our main Technical Summary for more information.
South West Water has undertaken sensitivity tests to test the uncertainty around whether it will achieve its per capita consumption (PCC) targets for 2020-25. We expect the company to make substantial efforts on demand reduction for the rest of the 2020-25 period, to ensure that WRMP19 forecast, and PR19 performance commitment targets are met annually, and to set firm foundations for delivering WRMP24.	To reduce PCC, we have enhanced our home audit programme for the last 2 years of AMP7. However, it is not possible to offset the increase in PCC we are experiencing following the pandemic. If we were to assume the WRMP19 PCC levels in our WRMP24 we would be presenting an unrealistic PCC that would misrepresent the supply-demand balance and create a risk to security of supply. We have rebased our baseline demand forecast to reflect the current position using the most up to date data. From 2025 onwards, we shall implement further demand reduction initiatives to achieve the average 110 l/h/d PCC requirement. The options for achieving this will be presented in our most likely pathway and we shall consider uncertainty in an adaptative pathway.	Please see section 8.7: adaptive planning process and 10.3: adaptive pathways in our main Technical Summary for more information.
The Company's problem characterisation is clearly presented. South West Water has used a 25 year planning horizon which appears to be based on the moderate level of concern from the problem characterisation. Although this meets the minimum planning horizon requirements, the rational for the chosen planning period should be further improved for the final plan.	Thank you for this recommendation – we will improve the rationale for the chosen planning period in our revised and final plans.	For more information, please see Appendix 12: Problem Characterisation
The key changes to the planning problem are described; Increased drought resilience and climate change are key drivers of investment for this plan. South West Water should provide assurance in its final WRMP that abstraction reductions are not double counted when licence capping is combined with environmental destination scenarios.	We have included licence capping and environmental destinations scenarios and we will ensure that our abstraction reductions are not double counted.	Please see section 5.3.1: planning scenarios) and section 5.4.1: sustainability

		abstraction reductions and WINEP scenarios in our main Technical Summary for more information.
South West Water explained that its current water resource model cannot readily assess the full stochastic datasets in a deployable output assessment. The company has plans to develop its water resources modelling capacity ahead of WRMP29 to allow them to undertake a full stochastic assessment, in line with stochastic approaches set out in the water resources planning guidelines (WRPG). We are disappointed the company has not developed this capability for WRMP24, given the forecast future water resource challenges in the West Country, and how the remainder of the industry has already developed its technical capabilities during recent WRMP rounds. We strongly encourage this development to fully test risk and uncertainty in the future water resource challenges South West Water is forecasting.	We've been presented with new planning scenarios and constraints such as the environmental destination and licence capping which has driven our planning deficit for WRMP24. The problem we're solving only became apparent whilst we started our planning. We we will focus on the scale of these constraints in our modelling capability ahead of WRMP29.	N/A
The company has included an assessment of its WRZ integrity. The company states that improvements were made to the distribution system of its Roadford WRZ during the 2022 drought, which restored the current integrity of the zone. The company states that this needs to be monitored to ensure that future growth doesn't threaten the WRZ integrity in the future. We expect the risks and monitoring approach to be set out in the final WRMP.	We have presented a reassessment of our target headroom in our final submission.	Please see section 6: our supply demand baseline in our main Technical Summary for more information.
The company's headroom allowance is high compared to most other companies, being an average of 9.7% of the company distribution input (demand) during 2025-30. Therefore, this planning assumption contributes significantly to the company supply-demand balance and proposal for investment. In its final plan, the company should present sufficient and convincing evidence that the headroom allowance is appropriate in both the short and long term, is not driving unnecessary and high regret investment, and that it has properly accounted for interactions with adaptive planning.	We have presented a reassessment of our target headroom in our final submission.	Please see section 6: our supply demand baseline in our main Technical Summary for more information.
South West Water should provide sufficient and convincing evidence to show that it has robustly tested the sensitivity for the date to meet 1 in 500 year drought resilience. This should include presenting the costs, benefits and impact on the selection of preferred schemes of choosing alternative dates including a test of delivery in 2050. The selected date to achieve 1 in 500 year resilience should be justified based on this testing and optimised based on the costs and benefits. This is important as the scale of impact and importantly the date for achieving it is a key driver for scheduling schemes in the investment programme. The company currently states that this is a regulatory target it must meet and that customers agree with the target level. However, the draft WRMP does not state that customers have been provided with any	Our decision-making approach has considered the impact of achieving the 1 in 500 yr. drought resilience at different dates. We have also set out the costs, benefits and impacts of achieving drought resilience on alternative dates in the programme appraisal technical appendix.	Please see the Technical Summary: Chapter 8 on decision making.

context for this or any data on the alternatives. This point was raised in the pre-consultation meeting and has yet to be appropriately addressed.		
Identifying an appropriate number and range of options to meet water needs is essential to ensure confidence that the preferred programmes are best value for customers and the environment. In order to address it's 156 Ml/d forecast deficit in 2050, South West Water has identified a total of 201 supply and demand options in its unconstrained list, with 92 options in the feasible list following screening, and 43 options selected in the preferred plan.	We have revised and improved our range of supply and demand options and ensured that the plan choices are fully justified in our programme appraisal technical appendix.	Please see the Technical Summary: Chapter 8 on decision making.
The preferred plan consists of 18 supply options and 25 demand options. In line with guidance, this represents a suitable range and number of options, and uses the twin track approach. The preferred plan has sufficient supply and demand management options to meet the deficits in the planning period (from 2025-2050). There are a range of option types in the preferred plan: leakage management, household and non-household water efficiency, metering, water treatment improvements, groundwater, river, reservoir, transfers and water reuse. The total gained water available for use (WAFU) would be 428 Ml/d, which would address 275% of the deficit. South West Water should justify the benefit of the options against the volume of deficit to avoid over-investment.	All of this has been updated and rerun. The WRMP is our 25-year long plan. For PR24, the options that will be selected for our funding submission will lead to our investment.	Please see Appendix 6
The draft plan states that the 157 supply options in the unconstrained list have been distilled down to 45 supply options in the feasible list through review and evaluation. The draft plan does not set out the methodology and criteria used to screen options between the unconstrained and feasible list, or detail reasons why any unconstrained options have been screened out. We therefore have concern over whether screening criteria is appropriate and has been consistently and transparently applied, which undermines confidence in the feasible list containing best value options. The final plan should detail the options screening process, including the criteria used to screen options, and its application.	We have increased the level of detail that is included in our resubmitted WRMP. It includes a more detailed explanation of our supply options appraisal process and detailed reasons where we have rejected schemes. Our process is based on both the WRMP planning guidelines and UKWIR planning tools.	Please see Appendix 4
South West Water include a transfer from a new reservoir, Cheddar Two, in its feasible options list, but this is not selected in the preferred plan. The company indicates this decision will be reviewed ahead of the final plan. Currently, the option is misaligned in the presentation of its needs case and selection across other company WRMPs and the Regulators Alliance for Progressing Infrastructure Development (RAPID) programme. We encourage South West Water to engage closely with the solutions sponsors in the RAPID programme (Bristol Water, Southern Water and Wessex Water) ahead of decision making for its own best value plan.	We have provided much more detailed information in the revised WRMP. We are working closely with the West Country Water Resources Group and under RAPID to align our plans. The Cheddar 2 scheme is currently undergoing a Gate 2 scope revision, as the original submission was a Wessex Water option, whereas we are looking to take water from Bristol to Wimbleball, Roadford or the Bournemouth water resource zones.	Please see Appendix 4 and Appendix 6 Information about how we are working within the WCWRG and RAPID is found here.

The company's draft WRMP only has limited number of third-party options with the majority of those considered being from other incumbent water companies. There is insufficient evidence that the company has met the expectations around the identification and fair treatment of third-party options, as described in the water resources planning guideline. We expect sufficient and convincing evidence in the final WRMP that all parts of the guidance have been appropriately followed in relation to third party options and that the lack of third-party options in the company's preferred plan is low regret best value. We note that the environmental regulator has concerns that the supply options presented in the preferred plan may not be viable on the grounds of their environmental impact, and as a result has questioned the viability of the preferred plan. We expect South West Water to respond to these environmental issues raised, as with all representations, to give Ofwat confidence that the subsequent business plan presents a viable, best value preferred plan securing resilience for customers and the environment.	We followed the WRMP planning guidance and have provided information on supply options in greater detail in our revised Plan. We have been working with Wessex Water to ensure third party options are low regret and best value.	Please see Appendix 4
The timing of the West Country Water Resources regional plan has not aligned with the timing of its associated companies WRMPs at the draft stage. As a result, South West Water's draft WRMP has not demonstrated how its company level plan has been informed by the West Country best value regional plan. This causes concern that the companies WRMPs have not been able to be informed by the regions strategic direction, nor reconcile best value options for the region and companies. For the final WRMP, we expect to see alignment between the region and company plans. South West Water's final plan should set out a standalone explanation detailing the regional methods and approaches to decision making, and how this has informed the company's plan and preferred best value plan.	We acknowledge the feedback and will ensure consistency between SWW's best value plan and the West Country Water Resources Group.	Information about how we are working within the WCWRG is found here.
South West Water should further demonstrate in its final plan that decision making has not been influenced by artificial constraints and that constraints are appropriate. This includes presenting the implications of sensitivity testing of different profiles of 1 in 500 year drought resilience, flexing the use of drought permits and orders, testing different glide paths on water efficiency and leakage as well as use of temporary use bans (TUBs) and non-essential use bans (NEUBs).	We have assessed a wide range of scenarios in our revised submission, including a range of different options around 1 in 500 year drought resilience prior to 2039. Our Best Value framework has allowed us to assess the balance between the impact of resilience on customer bills against customer preference to avoid the use of household water restrictions.	For more information, please see Appendix 6: Best Value Planning Approach and Methodology
We are concerned that South West Water has not appeared to put forward a full preferred plan for the Isles of Scilly in the draft WRMP.	We have assessed our AMP7 options for the Isles of Scilly in tandem with our long-term planning. The outcome of our planning for the Isles of Scilly is fully presented in our final submission.	Please see section 10.4.5: Isles of Scilly WRZ in our main Technical Summary.

The company currently presents four possible pathways, one of which will be proposed as the planning solution for the final plan. We expect the company to clearly set out in its statement of response what the preferred plan is, and demonstrate that is selected from the options and strategies discussed in the draft stage and therefore had the opportunity to be consultation upon.	It is important for us to consider many future outcomes and be able to react to changes in our assumptions when forecasting our long-term plans. Our scenario testing has allowed us to understand what future drivers will potentially require us to adapt. We have described how we will monitor specific progress and what conditions would cause us to change our planning pathway in our final submission.	Our preferred plan is set out in section 10.2: preferred plan – best value plan and the adaptive pathways are set out in section 10.3 of our main Technical Summary.
South West Water has not referred to Ofwat's public value principles. South West Water should use Ofwat's public value principles, and reflect expectations referred to in the PR24 final methodology, within the best value planning process in its final plan and explain how these have been used to inform best value decision making.	Our Best Value plan balances customer and environmental costs and benefits. We have engaged with our customers and stakeholders to inform our plan decisions.	For more information, please see Appendix 6: Best Value Planning Approach and Methodology
South West Water provide inconsistent explanations of its adaptive planning process throughout its plan, resulting in difficulty confirming if the adaptive planning approach adheres to water resource planning guidance and our long term delivery strategy. From the information provided, it is not clear whether South West Water has developed a core pathway in line with our guidance. South West Water explain that the core pathway has been developed by identifying the optimal options under each future scenario and then selecting the interventions which needed in more than 60% of future scenarios. However, when the core pathways for each water resource zone are described, it states this is based on meeting 'benign' scenarios only which does not align with our definition of low-regret investment.	We have reassessed our core pathway as part of our revised WRMP24 and ensures it is in line with all guidance.	Please see section 10.2: preferred plan – best value plan and section 10.3: adaptive pathways in our main Technical Summary.
South West Water present two different sets of scenarios. The Ofwat scenarios are clearly described alongside six 'primary futures' which it explains were developed before the Ofwat guidance was published. The 'primary futures' represent combinations of scenarios which are more adverse than the Ofwat scenarios. It is unclear how the 'primary futures' have been used in the plan. The Ofwat scenarios appear to have been used as sensitivity tests at the end of the process once the best value plan has been selected to identify alternative pathways and trigger points. South West Water state that abstraction reductions are the greatest risk factor and that six supply-side options are identified in addition to the best value plan. South West Water present an adaptive plan for each of its resource zones which sets out additional investment required over and above the best value plan if 'extreme' and 'adverse' scenarios come to pass. The core pathway is not presented as part of the adaptive plan. In its final plan, we expect South West Water to present a core pathway in line with the WRPG definition that includes low-	We have updated the range of scenarios / scenario combinations for our revised submission. These align with Ofwat's common reference scenarios. Our decision-making methodology has also been replaced with a fully compliant adaptive planning approach combined with full option sensitivity analysis. Our response therefores cover the full range of reference scenarios as well as additional scenarios to test and justify the least cost and best value plans. Our methodology provides a full analysis of the core pathway in addition to all of the key decision points for the adaptations in the plan.	Please see section 8.7: adaptive planning process in our main Technical Summary.

regret investment to meet future uncertainties and additional option value to allow further flexibility in the future. South West Water needs to demonstrate that scenario testing, including the common reference scenarios, has been used to identify low-regret investment that is required in all or most plausible futures. This should expose what investment should be undertaken regardless of future circumstances.		
South West Water should clearly set out the impact of the Ofwat common reference scenarios compared to the 'most likely' scenarios on which the preferred plan is based. This should include quantifying the impact on demand of the low and high scenarios for climate change, demand and abstraction reductions across the planning period. The company should also quantify the estimated impact on the expenditure requirement of planning: • based on the high scenarios for climate change, demand and abstraction reductions, and the slower scenario for technology; and • based on the low scenarios for climate change, demand, and abstraction reductions, and the faster scenario for technology. This will allow for improved understanding of the drivers of investment, the sensitivity of the plan to future scenarios and confidence in the investments being proposed. The company should use the results of this testing to identify and justify, with sufficient and convincing evidence, low regret investments, rather than just those that meet both low ""benign"" planning needs in a non-adaptive way. We expect the company to test the Ofwat common reference scenario for low abstraction reductions, which is to assume only currently known legal requirements for abstraction reductions up to 2050'. Following the approach agreed between Ofwat, the Environment Agency and the regional water resources planning groups, companies should: • include agreed WINEP changes and licence capping; and • use the agreed BAU+ scenario to form a long-term view, but use local reviews to remove licence reductions with significant uncertainty, to form a plausible 'extreme low' scenario."	The Ofwat common reference scenarios have been assessed as part of our adaptive planning and the individual impacts are described in our Best Value plan.	Please see section 8.7: adaptive planning process and 10.3: adaptive pathways in our main Technical Summary for more information. For more information, please see Appendix 6: Best Value Planning Approach and Methodology
The costs and benefits of the least cost plan against the preferred and alternative plans should be presented. Where investment is needed beyond least cost, the value of the additional benefit needs to be presented within the WRMP planning tables. The robustness of this valuation data is important where companies are requesting significant areas of investment. The company has presented a significant number of selected options with lower average incremental costs (AICs) which are selected later in the planning period than higher unit cost alternatives. This is exemplified in the Colliford zone where a reservoir option with an AIC of 35.8 p/m³ is selected for delivery in 2038-39 later than a water treatment works upgrade in 2027-28 at 43p/m³ and a new abstraction in 2030-31 at 140.4p/m³. The company should provide sufficient and convincing evidence that the preferred options being selected, are in order of best value in its final WRMP24 and ensure costs are reliable	We have presented a comprehensive summary of our decision-making process including the metrics we have used to assess our preferred pathway.	Please see section 8: our decision making process in our main Technical Summary and Appendix 6 for more information.

and efficient. When considering the whole life cost of the projects (including both capital and operating costs) preferred options also present lower unit costs than feasible options. However, the company also include projects with a high total cost, which then also present high unit costs. This is most notable for a large mains replacement option, with a total NPC of £279 million. We would encourage South West Water to provide further explanations around the selection of options, and we would encourage the company to develop a wider range of options.		
We expect South West Water to engage with the market and inform cost estimates to and to further develop the maturity of its costings. This will provide assurance that costs are robust, and can follow through to business plans and funding decisions in PR24. South West Water does not present the draft WRMP's impact on customer bills. This means that the bill increases impact does not appear to have been tested with customer engagement, nor is any context provided to show that there will be other costs impacting bills at PR24. We expect the company to provide sufficient and convincing evidence that the estimated bill impacts of the programme (and other areas of investment for PR24) has informed customer engagement and choices around policy drivers (such as 1-in-500 year resilience timing and environmental destination) and therefore scheduling of investment in the final WRMP.	A deliverability review was undertaken for 14 of the supply options by a third-party engineering consultancy. This process involved attributing RAG score across cost methodology, risk/optimism bias, data collection, modelling/calculations, option reports, key risks/constraints, and opportunities. The impact on customers' bills has been calculated for the alternative programmes considered in the appraisal undertaken to identify our Best Value Plan. This has been tested as part of the AAT (2025-2030) via focus groups (completed) and survey (currently in field) and Business Plan Testing (focus groups – completed). Key findings include: - customers approve our planned (legally required) WRMP investments to deliver a reliable supply of water to customers even during a drought, with a bill impact of £14 a year by 2030. - leakage remains a key priority for customers - customers prefer an increase in bills starting sooner and spread across different generations - 'resilient water resources through healthy catchments' is a high priority and securing resilient water resources is considered an urgent need - alternative PR24 plans (activities and bill impacts) have been tested with customers in the longer term context. o This includes £79 bill impact for WRMP by 2050 o Customers support a £5 increase for faster tackling of leakage by 2030 – they consider bill impacts affordable and that tackline leakage is key to resilience, offering benefits in terms of overall water management. o Overall, customers support at least the medium level of investment in all component areas (i.e. at least £15) by 2030. o Customers support at least the medium plan for WRMP when in context of all other plan elements. 80% support medium or faster plan (highest level of ambitions). As we develop the plan, we will match WRMP bill impacts and levels of service with the overall PR24 bill impacts and ensure the customer willingness to pay information is incorporated in the decision making framework.	Please see section 8.2.4: customer and stakeholder views in our main Technical Summary and Appendix 6 for more information.

South West Water has described wide-ranging approaches used to engage customers, such as the use of surveys and focus groups. This includes engagement by both the company and the West Country regional group. However, the plan lacks detail regarding how these approaches were carried out, such as ensuring fair representation. This would be valuable information to set out in the final plan. Although the draft plan sets out customer and stakeholder engagement outcomes such as customers priority of environmental approaches over infrastructure, the final plan should also explain how the outcomes have been used to influence decision making and the preferred plan itself. Regular and ongoing engagement with regulators has been described. However, there is a notable lack of explanation regarding how different industries have been engaged with, and the opportunities this may present. We expect to see this in the final plan.	We developed an approach to customer and stakeholder engagement that is broad (inclusive), robust and effective, and we are working to apply it consistently throughout the development and delivery of our work programmes across the region. We worked throughout the pre-and consultation on our WRMP24 to plan effectively and proactively, ensuring that potential opportunities are identified early, and to understand how our changing goals align with those of others. Our aim has been to build a shared understanding of future challenges and the potential solutions, while building a strong consensus on our plans and their delivery. We have gathered valuable insights and ideas by involving stakeholders in the decision-making process and seeking their input and have tapped into diverse perspectives and fostered innovation. We firmly believe that our customers and stakeholders have helped shape and guide our plan and we are incorporating 'you said, we did' sections throughout our revised plan to demonstrate where and how they have influenced our approach and the creation of our plan.	Please see section 3.5: customer and stakeholder engagement in our main Technical Summary for more information.
A signed board assurance statement and supporting statement demonstrates the Board's engagement and approval of the plan. A report on governance and assurance gives a description of the review process, including independent assurance. Information is provided about the future risks of licence capping, however there is no evidence that the Board has been engaged on this issue. This should be included in the final plan. As identified above, the draft WRMP programme for 2025-30 represents a significant uplift in expenditure compared to the PR19 programme. For its final WRMP we expect the company to provide sufficient and convincing evidence that the Board has challenged and satisfied itself that the WRMP and the expenditure proposals within them are deliverable in the context of the wider PR24 business plan proposals. The company should also demonstrate that it has put in place measures to ensure that the plans, of which the WRMP forms a key part, can be delivered.	We have provided a signed Board statement alongside our updated plan. The Board statement demonstrates the level of engagement the Board has had with the development of the WRMP and that it is satisfied that the proposals are both affordable and deliverable.	This is to be found in Appendix 10

ID Reference: 056	**Public Health Cornwall**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
From a Public Heath perspective there is no mention of how much all this required investment will impact on the end user / householders' bills.	We have provided more information in our revised plan around indicative bill impacts for customers.	Please see section 8.2.4: customer and stakeholder views in our main Technical

		Summary and Appendix 6 for more information.
There are health risks regarding the recycling and reuse of water that is collected to water gardens and clean driveways. Stagnant water risks, legionnaires disease, crypto parvum, giardia and E coli. How do people store water safely, use it appropriately and not use it to water edible plants / gardens?	We are currently continuing to promote rainwater butts for our HH customers. Grey water re-use has currently been excluded from our HH options due to health and acceptability concerns. Wider rainwater harvesting opportunities within new developments or at a community scale are being considered and careful design of these with the developer will be needed to ensure any public health risk is managed.	Appendix 5 sets out all unconstrained and feasible options considered in our WRMP
Paragraph 4 in 'Succeed together' mentions 'develop new treatment processes' to deal with saline, brackish waters and removing radon along with effluent recycling options but does not specify these.	We will provide more detail on the new treatment processes in due course. It will require water quality data over a protracted period to understand the range in contaminants that will then drive the process requirements.	We will work towards supplying this information for PR29.
There are particular challenges on the Isles of Scilly. For example, there is no accommodation for workers needed for construction of new infrastructure on the Islands.	Accommodation for workers and transportation of construction supplies will be considered at the detailed design stage and in our deliverability assessments.	This work will be undertaken at a later stage and so is not discussed in the WRMP
To lay a new raw water main and treated water main between Prewly and Northcombe 'to address water quality and sufficiency concerns' suggests water quality and supply is already an issue.	The water quality issues at Prewley WTW have been rectified and we are awaiting confirmation of this from the DWI. These new mains will increase resilience between Northcombe WTW and Prewley WTW.	This is being addressed in our PR24 plan and Green Recovery and is therefore outside of the WRMP.

ID Reference: 069	**Torridge District Council**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
The WRMP says the right thing but it needs more options if what happens is not as expected. The Plan needs to be affordable but a lot of the issues with leaks etc is due to lack of investment in the past. Hopefully it is all costed and the positives and negatives especially of desalination have been explored. Desalination needs more investigating, and reuse of treated wastewater needs to be sold better to the public.	We are continuing to develop options to ensure future resilience to drought. Our adaptive plan sets out how our plan can be flexed to meet changing external stresses and challenges in a timely way. All proposed schemes will undergo a full Strategic Environmental Assessment as an essential element of developing the proposal and this takes multiple factors into account including positive and negative societal, economic, cultural and environmental impacts. This process will be applied to major new infrastructure such as a desalination plant or wastewater recycling. Further, we undertake customer acceptability testing of the proposals before the detailed plans are developed.	Appendix 4: Supply options and Appendix 5: Demand options set out the full range of options considered. Appendix 6 shows how we have evaluated to options to derive our Best Value Plan.

There needs to be consultation about where new housing is placed strategically to ensure that there is sufficient water and foul water treatment capacity.	We do not determine where and when development takes place. This is the role of the Local Planning Authorities (LPAs) and the Local Plan. We work closely with LPAs to understand where new development is proposed and track this from planning application through to approval. This allows us to understand when new or extended water and wastewater facilities will be required so we can ensure the appropriate infrastructure is in place and in time to meet the demand.	Please see Appendix 2 on Demand Forecasting. More information about how we work with LPAs and developers is available here.
Protecting and improving the environment is very important but very expensive. South West relies on tourism so it is crucial. It feels like there should be some kind of tourist tax to support this	We agree that tourism supports the local economy in many ways whilst visitors enjoy the environment the South West provides. However, we are not in a position to influence the local taxation system.	This is not an issue we can comment on in the WRMP.
Greywater reuse should be incorporated in more new houses.	We agree but this is not something over which we have direct influence. It depends on central and local government policies in terms of the expectations made of developers. We support local authorities by providing advice on sustainable development policies.	More information about how we work with LPAs and developers is available here.
Modelling demand is challenging. However, measures to reduce demand are important and must be focused on both non-household and household. Customers need to realise the impact that demand reduction measures will have on them. The amount saved needs to be communicated better to customers. Is there some kind of financial incentive that could be offered to cut use.	Our future focus for water efficiency measures will be on both domestic and non-household. We agree that the issues need to be better communicated to both business and domestic users so that they can see the reductions both in water use and their associated bills. We are considering introducing an incentive tariff, but this may not be in the short term.	Appendix 5 sets out future trials as we work towards WRMP29, including tariffs. This is also referred to in our Technical Summary
Value for money but it needs to be demonstrated and communicated more widely to consumers.	It is important that customers recognise that our WRMP represents best value and that is not the same as least cost. Best value takes into account the added value of, for example, building nature-based solutions with the associated benefits of habitat and amenity creation rather than simply constructing grey-engineered solutions with no associated public benefits. We are committed to providing best value through our WRMP.	For more information, please see Appendix 6: Best Value Planning Approach and Methodology

ID Reference: 034	**Totnes Town Council**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
The Council believes that South West Water should be a statutory consultee as part of the planning process and would support changes in planning legislation to enable this.	Thank you for sharing the position of Totnes Town Council on this matter. Various legislation and regulations, such as the Water Industry Act 1991 and the Town and Country Planning (Development Management Procedure) (England) Order 2015, describe water companies' role in the planning process. Planning authorities are required to consult water companies on planning applications that may have implications for water supply, drainage, or wastewater management. In turn, water companies are required to engage with local authorities, planning authorities, environmental agencies, and other stakeholders during the planning process. They provide technical expertise, data, and information related to water supply and wastewater infrastructure to inform planning decisions. Water companies may also be involved in conducting environmental impact assessments (EIAs) or providing relevant information for planning applications that have potential implications for water resources or wastewater management. This ensures that the planning process considers the impact on water supply, drainage, and environmental considerations. The expression "duty to connect" refers to the obligation of water companies in England to provide new water and wastewater connections to properties as part of the planning process. It ensures that developments have access to adequate water supply and sewerage services. As part of the planning process, water companies play a role in assessing the feasibility of providing water and wastewater services to the proposed development. The duty to connect means that if the proposed development meets certain criteria and is granted planning permission, the water company is legally obliged to provide a connection to the public water supply and sewerage network.	More information about the role of water companies in relation to the planning and development system in England is available here.
The Council believes that there should be a further consultation on the South West Water Drainage and Wastewater Management Plan consulted on in 2022, and that there should be a clear link with the Draft Water Resources Management Plan.	Work is underway to align and integrate all of our strategic plans, including the WRMP and DWMP. This will primarily be achieved through our PR24 Business Plan, which Ofwat now requires companies to set out in the context of a 25-year Long-Term Delivery Strategy (LTDS). These strategies, which will be published alongside the 5-year business plan, will outline the long-term outcomes the company aims to deliver, and how they will deliver them in a range of plausible future scenarios.	Our DWMP is available here: drainage-and-wastewater-management-plan

No details are given to the effects of extreme weather events and the effects on water treatment plants, or how South West Water will respond to handle run off and slowing water flows down for example through tree planting, attenuation ponds.	The need to adapt our infrastructure to be resilient to the impacts of climate change and growth is a key focus in our PR24 Business Plan 2025-30, in the accompanying Long Term Delivery Strategy and in our WRMP. We recognise the risk that climate change poses to our operational activities and the resilience of our assets and have comprehensive plans for how we will adapt to these impacts. Also, following feedback from stakeholders we are increasing our use of nature-based solutions and adopting a 'green first' approach to achieving these goals. This means that we will consider the potential contribution that nature-based (green and blue) solutions can make to solving water management challenges before we consider traditional engineered (grey) solutions.	Section 3.3 of our Technical Summary sets out the challenges ahead that we need to address through the Plan, and Section 7.6 sets out our approaches to resilience. Further, information about managing drainage issues are within our sister strategy, the DWMP: drainage-and-wastewater-management-plan
No detail is given about water quality monitoring, frequency of monitoring and what is being tested for, for example, nitrates, pollutants, plastics and antibiotics, particularly in relation to bathing water areas.	We ensure our water is treated and distributed to strict quality standards regulated by the Drinking Water Inspectorate (DWI). Any supply options have been designed to comply with our asset standards and deliver the required water quality before being put into supply. Water quality testing and monitoring falls within the remit of the Environment Agency and our sister strategy: the Drainage and Wastewater Management Plan (DWMP).	This is outside of the WRMP but is covered by our PR24 plan. Further, information about water quality and testing is within the DWMP: drainage-and-wastewater-management-plan
No details are given on the wildlife species currently supported which therefore gives no baseline to monitor improvement or deterioration against.	Thank you for raising this during the consultation. Biodiversity Net Gain is a relatively recent statutory requirement. At the moment, we do not have a baseline against which to assess gain or loss. However, we are committed to working with our environmental regulators and environmental groups such as the wildlife and river trusts during AMP8 (2025 -2030) to develop a baseline of species to monitor against and will be taking a collaborative approach to this, sharing data and expertise with our partner organisations.	More information about how we are looking after the water environment is available here: environment

We would like to see the use of future modelling of the impacts of river water levels – in drought and flood conditions – and the environmental and biodiversity effects.	Our WRMP is built on several water resource models that forecast future flow regimes in rivers and identify where abstraction may have an impact on their ecological health. At its core, the WRMP is based on the Environment Agency's National Framework for Water Resources assessment, in which each waterbody is assigned to one of three Abstraction Sensitivity Bands (ASBs) according to the sensitivity of the watercourse to abstraction pressure. This assessment, coupled with our own, has allowed us to identify where abstraction may need to be reduced to protect the environment.	Section 5.4 of our Technical Summary sets out what we need to do to achieve sustainable abstraction.
No detail of how this strategic approach is taken into account in plans and programmes to assess and address the effects of run-off from agriculture and developed areas.	Water companies are required to identify integrated catchment- and nature-based solutions in their WRMPs. These should deliver multiple benefits, for example reducing flood risk and improving resilience of the environment to droughts. It is also recommended that water companies deliver these measures at a catchment scale, either working solely or in partnership with other catchment-based organisations. We have incorporated a significant programme of catchment management and nature-based solutions for water resources and resilience benefits into our PR24 Business Plan and accompanying Long Term Delivery Strategy. These investments will primarily be delivered under the auspices of the collaborative Upstream Thinking scheme, but also via the wider natural resources investment programme, for example, peatland restoration. In addition, a WINEP investigation to evaluate the water resources benefits of catchment management is also planned in AMP8, and to expediate the mainstreaming of catchment and NBS for water resources outcomes we have secured £1m funding from the Ofwat Innovation Fund to deliver the Water Net Gain project, which will undertake research into farm business and water supply resilience across the region.	More information about our 'Upstream thinking' programme is available here: nature-based-solutions
All sewage treatment should be designed to include anaerobic digestion waste systems to support energy production, address climate change and prevent sewage discharges into rivers and the sea. This could be combined with agricultural slurry treatment in rural areas.	Sludge is a by-product of the treatment of wastewater. We no longer see sludge as a waste product but as a bioresource. At present, we recycle all our sludge using anaerobic digestion and lime stabilisation techniques to create a biosolid product for agricultural use. We have also invested in creating energy from waste and currently have seven operational CHP (Combined Heat and Power) plants creating a biogas that is then turned into green electricity used to provide the power to operate our sewage treatment works and helps us keep costs down for customers. Ofwat is changing its regulatory approach for bioresources (sludge) to promote market development and innovation. The opening of the bioresources market in 2020 offers opportunities for efficiencies in the transport, treatment, and recycling of sludge to deliver benefits for our customers and the environment. All this falls into remit of our sister strategy, the Drainage and Wastewater Management Plan (DWMP).	Information about water quality and testing is within the DWMP: drainage-and-wastewater-management-plan

The plan should include flood risk modelling for any new development and the potential effect on neighbouring areas and river catchment from surface water run-off.	Flood modelling is a responsibility for water companies working the Lead Local Flood Authority, relevant councils and the Environment Agency. The issue is addressed in the Drainage and Wastewater Management Plan (DWMP) rather than the Water Resources Management Plan (WRMP).	For more information on our role in flood risk management, please see: drainage-and-wastewater-management-plan
South West Water needs to take into consideration the cumulative impact of various housing developments in a water catchment area in terms of provision of potable water, capacity of water treatment plants to process the sewage and grey water generated, flood risk from non-permeable surfaces, and run-off effects into rivers.	The WRMP looks at the need for additional water to meet the needs of all customers now and in the future whilst ensuring there is always enough water in environment to meet its current, future and long-term needs. We work closely with local planning authorities to understand where growth and development is planned so that we can take all the issues you have raised into account and ensure we can meet the requirements of the development, customers and the environment.	More information about how we work with local authorities and developers on new development is available at: building-and-development
New developments should install separate sewage and rainwater systems to lessen the volume of water passing through the wastewater treatment process, and natural soakaway areas within the site of any new development should be insisted upon.	Yes, we completely agree. We work with the local planning authorities to support their policies concerning issues such as rain and foul water separation, surface water attenuation, and grey water recycling. Collectively, we aim to proactively influence implementation of these policies by developers. In addition, our Demand Management Strategy, set out in the WRMP, includes the proposed use of these solutions to help households and businesses become more water efficient.	More information about how we work with local authorities and developers on new development is available at: building-and-development
Could the water companies insist on all new housing developments to be fitted with grey water harvesting for use in the home, for example toilet flushing, water butt collection, to reduce the volume of water consumption required per capita and support increased drought resilience?	As a water company, we do not have the authority to insist on the incorporation of these measure in new developments. However, we do have some influence over the local planning process and are working with both household customers and stakeholders in from key sectors such as developers, agriculture and tourism, to encourage the adoption of water efficiency measures of the type you describe.	More information about how we work with local authorities and developers on new development is available at: building-and-development
South West Water should be empowered to refuse additional developments loading onto the system where capacity for the provision of potable water and/or sewage treatment has been reached and can be demonstrated.	Under current government regulations, we are not a statutory consultee in the planning and development process and have no powers to prevent development on any grounds. Our role is to facilitate development for the benefit of our customers and society, and developers have the 'right to connect' which means we must provide supply and drainage services to approved developments. However, we are able to set conditions for connecting supply and / or drainage. It is the role of the Local Planning Authority to ensure these conditions are met.	More information about our role of water companies in the planning and development system is available here.

ID Reference: 046	Wiltshire County Council	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Wiltshire has a range of environmentally sensitive assets which we need to protect, not least the Hampshire Avon Special Area of Conservation (SAC) and associated chalk streams. We welcome the draft plan's recognition of the key challenge to reduce water abstraction from the River Avon catchment and, although this will reduce the amount of available water from this source, we support your commitment to protecting chalk streams by changing the way abstraction occurs.	Thank you. Our abstraction licences are agreed with the Environment Agency to ensure the needs of the environment are protected. This is vitally important to protect our rare chalk streams and designated habitats. Our licences are regularly under review and may need to change alongside changing external factors such as climate and population growth. We must always comply with our licences.	Please see section 5.4 in our main Technical Summary
The Regulation 19 version of the Wiltshire Local Plan Review will be published later this year and will contain development proposals looking to 2038. A proportion of new development is planned within Wiltshire for Salisbury and the rural areas representing a significant demand for additional water, which will be sourced from within the Hampshire Avon catchment when additional new water supply resources and a greater focus on water efficiency is recognised as being needed to meet future environmental and demand requirements. For a large part, planning conditions within the River Avon catchment are already required to meet water consumption targets of 110 litres per person per day. We are also in the process of reviewing the water efficiency standards, for both residential and non-household development, to be used within our emerging local plan policy and, to this end, we would be keen to be kept up-to-speed with your work in this area, including work you might be engaged in with other stakeholders and what mutual support may be available to us both.	Thank you for highlighting these new developments that will require water supply. We wholly support your policies for water efficiency. The WRMP looks at the need for additional water to meet the needs of all customers now and in the future whilst ensuring there is always enough water in environment to meet its current, future, and long-term needs. We work closely with local planning authorities to understand where growth and development is planned so that we can take all the issues you have raised into account and ensure we can meet the requirements of the development, customers and the environment.	More information about how we work with local authorities and developers on new development is available at: building-and-development

3. Non-statutory organisations

ID Reference: 060	Devon Wildlife Trust	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Adaptive planning is a good approach, but good foundations need to be laid first. Where there is uncertainty we should adopt the precautionary principle ensuring the needs of the environment are definitely being met until the evidence shows that any additional abstraction will not result in unacceptable impacts on it. Investment in infrastructure is needed now to improve leakages and use of water supplies where they are rather than moving them around will have less impact on the environment in the longer term. Whilst we know that significant investment won't be the first priority for shareholders and customers, water is taken from the natural environment so reinvesting in the long term future of this is vital.	Within our best value planning approach, we have considered different optimisation goals when developing our best value plan. This includes considering features such as the environmental and carbon impact and the value customers and wider stakeholders place on delivering demand-side savings and leakage interventions. We have looked to ensure that our leakage ambition is balanced and considers both the need to achieve the minimum government targets whilst looking to maximise wider social benefits where cost-effective to do so. This is discussed further in our technical appendix on "developing our best value plan".	For more information, please see Appendix 6: Best Value Planning Approach and Methodology
Good value long term is about investment now. Solving the leaks, investing in new 'self heal' technology and the many other efficiencies that can be gained from technology and modern equipment as well as a whole range of nature based solutions in the near future will save costs in the longer term. We are pleased to see a continued focus on finding and fixing leaks. Leakage is wasting the energy and chemicals used for abstracting, treating and pumping the wasted water through the network. Smart meters and other actions to help customers and businesses find and stop their leaks are welcome and we would like to see an even higher target of leakage reduction included.	Within our best value planning approach, we have considered different optimisation goals when developing our best value plan. This includes considering features such as the environmental and carbon impact and the value customers and wider stakeholders place on delivering demand-side savings and leakage interventions. We have looked to ensure that our leakage ambition is balanced and considers both the need to achieve the minimum government targets whilst looking to maximise wider social benefits where cost-effective to do so. This is discussed further in our technical appendix on "developing our best value plan".	For more information, please see Appendix 6: Best Value Planning Approach and Methodology
It is important to build the evidence base so that nature-based solutions can be more readily employed in future. We think the plans could do more to factor in that such schemes are important from a climate perspective too, being light on carbon and helping river systems (that we rely on for our water) to adapt to a changing climate.	Water companies are required to identify integrated catchment- and nature-based solutions in their WRMPs. These should deliver multiple benefits, for example reducing flood risk and improving resilience of the environment to droughts. It is also recommended that water companies deliver these measures at a catchment scale, either working solely or in partnership with other catchment-based organisations. We have incorporated a significant programme of catchment management and nature-based solutions for water resources and resilience benefits into our PR24 Business Plan and the accompanying Long Term Delivery Strategy. These investments will primarily be delivered under the auspices of the collaborative Upstream Thinking scheme, but also via the wider natural resources investment programme, for example, peatland restoration. In addition, a WINEP investigation to evaluate the water resources benefits of catchment management is also planned in AMP8, and to expediate the mainstreaming of catchment and NBS for water	More information on 'Upstream thinking' is available here: nature-based-solutions

	resources outcomes we have secured £1m funding from the Ofwat Innovation Fund to deliver the Water Net Gain project, which will undertake research into farm business and water supply resilience across the region.	
We are pleased to see certain water courses with reduced abstraction but it is critical to note that very few of our region's rivers have yet to meet WFD 'good' status. Water quantity in rivers affects concentrations of pollutants as well as abundance of wildlife. Whilst we note that minimum water levels use WFD as a 'hands off flow' guide, we suggest that a higher bar is set for abstraction levels to maintain healthy water bodies. Maintaining a good base flow is critical to aquatic life and healthy oxygen levels.	We have an ongoing WINEP programme and a number of AMP8 investigations which will show the sustainable level of abstractions in our catchments. Our future programme of options is dependent on the outcomes of the AMP8 investigations. This will ensure we comply with river basin management plans.	Please see Appendix 5 for the further options included in the WRMP demand options.
It is critical that all abstractions meet the requirements of the Habitats Regulations and Water Framework Directive at a minimum to protect the fragility of our water systems. Moving water from one catchment to another can have a detrimental impact on the natural environment. Water compatibility is not mentioned in the plan and is important to consider. The biodiversity thriving in one catchment may not be the same as another catchment due to differing levels of minerals etc so this needs to be taken into account and water moved only as a last resort.	We fully understand your concerns regarding water transfers and the impacts these could have on the environment. All such proposals will undergo a full SEA (including Habitat Regulations, INNS, BNG, WFD, and Natural Capital assessments) to understand any potential negative impacts so that these can be addressed and mitigated wherever and whenever necessary.	N/A
Restoring quarries to hold more water locally can be a good solution, particularly if the restoration works are sensitive. Meeth Quarry near Hatherleigh is a good example. Where water does need to be transported, we would urge the use of renewable energy in order to hit the Net Zero target.	We commenced a new electricity contract with renewable energy supplier, ENGIE, in April 2022 and have transferred all of our electricity sites to this new 100% renewable source. We are aiming to achieve up to 50% self-generated energy by 2030 and where we cannot generate enough ourselves to meet all our needs, 100% of the energy we purchase will be from renewable sources.	More information about our energy efficient managment is available at: netzero
Climate change is an unknown risk on the region's wildlife. Water supply is likely to be affected more and more so storing water within catchments will be critical. There can be multiple benefits of investing in whole catchment management, peatland restoration and natural water resource management (e.g. quarry restoration rather than building reservoirs) including biodiversity increase and carbon capture as well as improvements for leisure and recreation. These could be referenced in the plans. Other plans to improve the environment are welcomed and we would like to see SWW showing leadership and securing better outcomes by ensuring that biodiversity delivery aligns with priorities being set out in Local Nature Recovery Strategies, and going well beyond the 10% minimum requirement to at least 20% gain.	We are fully committed to investing in whole catchment management, peatland restoration and natural solutions for water resource management. We also acknowledge our responsibility to support Local Nature Recovery Strategies (as set out in recent legislation and the Government's Plan for Water), deliver Biodiversity Net Gain (and improvements to the environment) and are working to align our updated biodiversity strategy, PR24 Business Plan and Long Term Delivery Strategy with these requirements.	More information about our work protecting the environment, habitats and wildlife is available at: environment
There could be huge potential increases in water demand to meet the needs of the agriculture and energy sectors. It is essential that wherever possible water-hungry energy supply options should be sited in places where there is water available and they should not add to existing water availability problems. We need to see a shared commitment to both demand and supply side solutions from other sectors taking water from the environment.	We will manage Non-Household increase in demand through contractual trade arrangements by working with our retailers. Our remit is to supply water to our customers, communities and business whilst ensuring environmental needs are met, no matter where the demand comes from.	Please see Appendix 5 and Appendix 6

We are pleased to see resources invested in encouraging reduced usage but the combined effects of more home-working during and since COVID plus hot summers in 2020 and 2022 will make this challenging and shouldn't be underestimated. There is a huge opportunity to reduce the non-household demand, particularly around the agriculture and tourism sectors as well as industry across the South West. Targets could be included for support for more rainwater harvesting for non-household customers for example.	We have revised and improved our range of demand side options. We have begun work with both the Agriculture and Tourism sectors to look for opportunities for developing non-potable supplies, and to drive down water-consumption in the tourism sector. Smart metering, customer-feedback to provide behavioural nudges, and targeted water audits to both the HH and NHH sectors will contribute significantly to demand-side savings.	Please see Appendix 5 on demand options.
Per capita reduction targets are likely to be predicated on government legislation to help with reduction of water use including standards for household appliances, product water labelling and building standards. Lobbying from the water industry for this government support could be included in the plans.	We are supportive of forthcoming legislation on water labelling and welcome the benefits it will bring to future demand management. These benefits form part of a wide range of water efficiency activities we will be implementing to achieve our consumption reduction targets.	Water labelling is now included in our preferred options. This is shown in Technical Summary in the section on demand management and water efficiency.
Feedback from our Catchment Partnership members includes a request for SWW to work more closely with the Local Planning Authorities to ensure that any large scale water hungry developments should be water neutral. And that more consideration is given to water usage and supply for all new developments, coupled with better wastewater system designs.	We are aware that water neutrality may be introduced as a requirement at some point across specific areas in the South West. However, it is Natural England that will introduce this restriction. We will support all local planning authority policies expecting developers to implement water neutrality, efficiency, surface water harvesting, grey water recycling and other such measures. Various legislation and regulations, such as the Water Industry Act 1991 and the Town and Country Planning (Development Management Procedure) (England) Order 2015, set out water companies role as consultees in the planning process. Planning authorities are required to consult water companies on planning applications that may have implications for water supply, drainage, or wastewater management. In turn, water companies are required to engage with local authorities, planning authorities, environmental agencies, and other stakeholders during the planning process. They provide technical expertise, data, and information related to water supply and wastewater infrastructure to inform planning decisions. Water companies may also be involved in conducting environmental impact assessments (EIAs) or providing relevant information for planning applications that have potential implications for water resources or wastewater management. This ensures that the planning process considers the impact on water supply, drainage, and environmental considerations. The expression "duty to connect" refers to the obligation of water companies in England to provide new water and wastewater connections to properties as part of the planning process. It ensures that developments have access to adequate water supply and sewerage services. As part of the planning process, water companies play a role in assessing the feasibility of providing water and wastewater services to the proposed development. The duty to connect means that if the proposed development meets certain criteria and is granted planning permission, the	More information about our role in the planning and development system is available here.

	water company is legally obliged to provide a connection to the public water supply and sewerage network.	
We are pleased to see recovering, recycling water and diversifying water supply within the plans. All should be subject to appropriate environmental and biodiversity assessments before plans are finalised. Suitable environmental monitoring programmes should be put in place.	We will be undertaking comprehensive assessments for each of our supply options and engaging with stakeholders before any options are developed.	Please see Appendix 5 on Demand Options.
The movement of water between catchments and across regions should be done with caution and following suitable environmental assessments. More can be done to store good quality water within catchments including promoting healthy soil husbandry and adoption of Farming Rules for Water and sensitive farming practices, wetland creation and ponds on farms.	We agree. We have set out our commitment to catchment and nature-based solutions as our priorities for delivering solutions rather than relying on traditional engineering solutions and water transfers.	Please see Appendix 4 More information regarding our commitment to delivering NBS is found here: environment
We have recently seen an increase in public consultation around drought permit orders and welcome the responsible management of our water supplies. We are very supportive of active engagement with local communities and with active drought management. We would urge environmental monitoring of pressurised water bodies and of active drought management measures to ensure minimum impact on biodiversity.	We agree with you on the importance of active engagement with local communities and now have dedicated community and stakeholder engagement teams who are working to communicate and engage with as many interested parties as we can. We are also including a significant programme of monitoring and investigations (ecological, water quality and water resources) in priority waterbodies across the region in AMP8.	More information about our work in the community is available here: community
Wildlife & Countryside Link's Blueprint for Water sets out The Wildlife Trusts' priorities for water industry Water Resources Plans. In summary, and with specific reference to SWW's Draft Water Resources Management Plan 2025-2050, we would urge you to include the following: • Set out the environmental needs first of each drinking water catchment • Set targets for reducing abstraction from sensitive areas • Commit to 20% gain in biodiversity, supporting Local Nature Recovery Strategies • Include the impact on carbon emissions of alternative sources of water supply • Set targets for reductions in non-household consumption and measures to support this • Include reference to multiple benefits delivered by nature based solutions and build the evidence base • Be more vocal on tighter water efficiency standards for new developments.	We have reviewed and updated both our demand and supply side options to better understand, the cost, water-saving, carbon and environmental benefits or impacts that arise, and used these to inform our decision making. These options include a much wider range of NHH demand-side options. We have assessed the environmental needs of each catchment to understand the reductions in water abstraction required to protect the environment. There is still some uncertainty around the size, scale and pace of these reductions but we have looked at how quickly we can introduce these reductions and the impacts on our WRMP plan choices. As part of continuing to develop our options, we will continue to explore opportunities to maximise biodiversity net gain. We have developed a range of water efficiency options, looking to work with housing and commercial developers to find ways to introduce new water efficiency devices and innovation, as part of new-builds. We will look to incorporate stronger messaging in ongoing customer engagement to reinforce the importance of water saving and water efficiency. We are considering options for partnership working with future developers and will look to incorporate this message on water efficiency standards within this activity.	Appendix 5 provides a summary of demand options and includes information on partnership working and commercial developers / innovation.

ID Reference: 049	National Trust	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
The Trust supports spatial planning and environmental management that takes a holistic and plan-led approach. This includes planning for the long-term, looking at the landscape or catchment scale, and considering the implications for climate change, landscape, heritage and nature. The final WRMP should incorporate an environmentally responsible and sustainable approach to development, with clear SMART aims and objectives. All aspects of planning and programming should follow the mitigation hierarchy, for example, addressing all leaks prior to developing new assets, and developing strategic/regional level drought resilience measures in parallel with new infrastructure. There needs to be a clear communication and education strategy on demand management and a commitment to full and effective engagement and communication with all stakeholders that may be affected by any proposals.	Our Preferred Plan has been built on the basis of extensive scenario and option testing, with decision making made in accordance with Best Value principles. A wide range of ambitious demand options as well as supply options have been considered. We have selected options on the basis of our assessment of their likely performance against a range of metrics that reflect our strategic objectives of enhancing the natural environment, ensuring resilience of supply and delivering benefits to society, as well as the cost to consumers. The balance between leakage reduction and other demand side options on the one hand, and new supply options on the other, will be determined in two ways. Firstly, we examined the costs and benefits of alternative programmes that would (a) meet the requirements set by the government and our regulators and (b) achieve these targets within a different timeframe. Secondly, we factored customer valuations of alternative demand and supply options into the assessment of alternative programmes, reflecting evidence we have gathered about our customers' willingness to pay to avoid environmental impacts of particular types of supply option and the benefits of leaving water in the environment.	For more information, please see Appendix 6: Best Value Planning Approach and Methodology
When the National Trust acquires land or buildings that it considers to be of outstanding quality, we declare that land “inalienable” which means it cannot be sold or mortgaged, and must remain in the care of the Trust for the benefit of the nation, in perpetuity. It is one of the most important ways in which the Trust delivers its charitable purposes. We recommend that any proposals to develop water resource assets which may directly affect National Trust land should be discussed at an early stage. Properties / areas of land with National Trust responsibilities are relevant to the schemes outlined in the consultation. The National Trust’s position with regard to these schemes is reserved. Where there are areas of National Trust land potentially affected by any stage of the overarching dWRMP options, including any that have not been specifically identified below, the Trust would welcome further engagement on South West Water’s draft WRMP24 prior to its finalisation. Colliford WRZ • Godophin, a 550-acre estate, grade I listed house, grade II park and garden and SSSI • Lanhydrock, an 890-acre estate, grade I listed house, grade II park and garden north of Restormel spanning the River Fowey	One of the important steps in progressing our supply option schemes is to understand the environmental impact of the solution. Where it looks as if we will proceed with a planning application, we will undertake early engagement with key stakeholders and conduct an environmental assessment to ensure we understand all positive and negative impacts and benefits. Engagement will continue throughout the detailed design phase for all of our options.	More information about our role in the planning and development system is available here.

Wimbleball WRZ • Knightshayes Court, a grade I house and grade II park and garden west of Allers WTW and reservoirs Bournemouth WRZ • Kingston Lacy, an 8,500-acre estate, a grade 1 Treasure House, grade II registered park and garden west of Wimborne Minster, the majority of which lies within Cranborne Chase and West Wiltshire Downs AONB. The Trust also holds covenants over a significant amount of land to the north-east of Wimborne Minster • Holt Heath and Forest, north-east of Wimborne Minster, one of the largest and most important areas of lowland heath in Dorset with SSSI/SAC/SPA and RAMSAR designations • Ibsley and Rockford Commons, a mosaic of heathland, wetlands and ancient woodland pasture with SSSI/SAC/SPA and RAMSAR designations, located north of Ringwood and east of Ibsley. • Godophin		

ID Reference: 079	**South West Rivers Association**	
Feedback	**South West Water Response**	**For more detail in our revised dWRMP**
The approach is overly reliant on demand reduction with uncertainty about leakage reduction and the ability to change customer behaviour. This will increase the need for additional resources with inevitable adverse impact on the natural environment and fisheries of South West Rivers. The draft Plan gives no information on any planned measures to mitigate these effects.	We are prioritising demand management to minimise our impact on the environment. We are committed to achieving all of our demand reduction targets that will reduce our requirement to abstract as we are very aware of the environmental consequences.	Please see Appendix 2 on Demand Forecasting
The 2022 /23 drought has demonstrated the inability of SWW to deal with a 1:200 year drought without resorting to customer restrictions and Drought Orders to enable increased abstraction from rivers. It is then foolhardy to pretend that the draft Plan will enable SWW to cope with a 1:500 year drought especially as prediction of the impact of climate change and population pressure is fraught with imprecision. The draft Plan refers to meeting a 6% increase in population driven demand over that faced in 2022 – is it enough? The draft Plan is still work in progress and includes too many uncertainties to be fit for this final stakeholder consultation. There are several instances of proposals not included in the draft Plan such as the second Cheddar reservoir. This demonstrates either an unwillingness to consult fully or inadequate preparation of the draft Plan.	Thank you for your comments. Our WRMP ensures that there is a plan to maintain a balance between supply and demand over the next 25 years and our resilience to a 1 in 50 year drought event. A requirement of the WRMP is to develop adaptive pathways. The aim of the adaptive pathways is to minimise unnecessary upfront expenditure that would be required to meet each and every possible future event, such a 1 in 500 year drought. We must ensure our plan remains affordable for our all customers. The adaptive pathways monitor actual versus predicted changes, including population growth and climate, and will trigger expenditure at an appropriate time.	Appendix 6 section 7 sets out how we are planning to adapt to an uncertain future.

The most concerning aspect of the draft Plan is inconsistencies which demonstrate either careless drafting or a high degree of uncertainty such as the plan to take 209ML/d less from rivers by 20250 while seeking to change Abstraction Licences to enable more abstraction from sensitive rivers such as the Lyd/Tamar. Seeking to change Abstraction Licences to better reflect the balance of supply and demand and balancing the flow of water by taking more water where there is an abundance. Why is this needed if planned demand reduction will work?	We have taken steps to ensure that the inconsistencies you raise are clarified in the revised WRMP. We continue to work with all our partners and regulators to improve our understanding of how the challenges we face might impact water supply and the environment both now and in the future. Our WRMP includes a rigorous forecast of future water supply, and we have a statutory duty to meet the demand for water while also achieving sustainable abstraction that protects and improves the environment. All drought permit and licence change applications are subject to statutory assessments (SEA, HRA, WFD, etc) by our regulators and receive the same level of scrutiny as any other WRMP options. We will only ever look to put permits or licences in place if 1) we agree that it is absolutely needed and 2) if it is environmentally sustainable and permitted by the EA.	Please see section 5.4 in our main Technical Summary
In all three SWW Supply Zone the draft Plan refers to demand reductions but a need for increased supplies. The section on Adaptive Strategies suggests a lack of confidence in the draft Plan to 2030 and is already out of date. For example, the reference to the option of pumped storage from the Lyd to Roadford – this is now happening so this consultation is too late.	We are required to adopt a holistic adaptive approach to our planning by our regulators. An adaptive approach identifies a preferred plan, but also develops and assesses the costs and benefits of modified plans for alternative future scenarios. This does not infer that the preferred plan is not robust, but rather reflects the uncertainty we have about the future. The plan also identifies 'trigger points' where monitoring and evaluation may identify the need to switch to an alternative plan. The Roadford pumped-storage scheme is being delivered in AMP7 under our Green Recovery investment programme and it is therefore included in the supply baseline for our current WRMP which comes into effect in 2025.	Appendix 6 section 7 sets out how we are planning to adapt to an uncertain future.
In all three Supply Zones we expect SWW to use the existing partner engagement groups for detailed discussion of the options i.e. Fowey Fisheries and Resources Group, Roadford Fisheries Liaison Committee and Exe Mitigation Group. For SWRA and its individual river associations engagement has been too patchy to inspire confidence. There is reference in the draft Plan that four working groups have been established including one for Fisheries and Rivers – this has not happened, no membership nor Terms of Reference proposed.	We remain fully committed to establishing the sectoral interest working groups under the auspices of the WCWRG and would still very much welcome your participation in these conversations. Following a change of leadership and a review its governance and structure, the WCWRG now has dedicated resources to drive the regional water resources agenda and plan forward. The new structure has enshrined the working groups approach initiated in 2022 and will see the establishment of a 'multi-sector' working group to take forward the conversations with key representatives of the fisheries and rivers, agrifood sector, tourism, mineral extraction and other key sectors.	Information about how we are working within the WCWRG is found here.
The words used suggest a willingness but there is insufficient detail in the draft Plan to support or not. We are ready to work in partnership on the ideas mentioned including projects to bring larger environmental benefits such improved fish passage and the use of hatcheries, conducting further studies to provide evidence that is needed and river restoration schemes.	We are fully committed to delivering all our statutory responsibilities and duties in relation to eels, freshwater (migratory) fish, and maintaining healthy and resilient fish stocks. We welcome and accept your offer to work in partnership to achieve these goals. We will also continue to support and commit to all the reservoir mitigation/planning and other work to management and enhance fish habitat. The recruitment of specialist fisheries expertise into SWW is evidence of these commitments. Furthermore, the new partnership catchment schemes developed for the Hampshire Avon and Dorset Stour for AMP8 have been designed to include a partnership approach to fisheries and river management.	Our strategy to protect and enhance biodiversity and habitats is found here: environmental-performance and here: nature-based-solutions

There is insufficient detail to comment but support for investigating all options. However the draft 25 year Regional Plan shows water leaving SWW's area to support Wessex and the chalk streams with no planned inflow. References in the draft Plan to the benefits of the second Cheddar Reservoir and use of recycled water from Poole WWTW are misleading.	Our final WRMPs will be aligned and ensure resilience of supply across the region.	Information about how we are working within the WCWRG is found here.
There is little reference in the draft Plan or the draft Regional Plan to the transformative development of its three strategic reservoir/river regulation schemes. This appears to be a major issue and leaves only tactical developments which may be inadequate to meet the planned 1:500 resilience target. SWW should commence planning for a transformative new strategic resource – history suggests that the time taken for delivery is long and it is not too soon to start	We have explored strategic regional options to support SWWs supply-demand balance in the future.	Please see sections 3.7, 7 and 8 of our Technical Summary.
The main challenge is the uncertainty in modelling demand reduction with the range of options. There is a tendency to focus on customer behaviour only in times of drought	We have ongoing customer-facing campaigns regarding water efficiency and reducing demand, such as Save Every Drop and the Non Household Innovation Fund that are running continuously. It is, of course, highly likely that these come into a sharper focus during drought situations.	More information on Water Fit is here: waterfit Please Section 9 on Demand Management in our Technical Summary.
SWW was a leader in the introduction of metering domestic properties. The significant level of meter penetration should be used for the rapid introduction of rising block tariffs to reduce demand and ensure affordable supply for essential use whilst having minimal effect on overall income.	We have developed various tariff options for trial in early AMP8, once smart metering penetration and our billing systems has been updated. These tariff options will be discussed more fully in SWW's PR24 submission.	Please see Appendix 5 which sets out future trials as we work towards WRMP29, including tariffs. This is also referred to in our Technical Summary.
Given the uncertainty about the impacts of climate change, population growth, changing regional economy and demand reduction, use of Drought Orders which adversely impact on the riverine environment, should not be seen as the easy option if the company is to deliver its expressed ambition to become an 'Environmental Leader'.	We continue to work with all our partners and regulators to improve our understanding of how the challenges we face might impact water supply and the environment both now and in the future. Our WRMP includes a rigorous forecast of future water supply, and we have a statutory duty to meet the demand for water while also achieving sustainable abstraction that protects and improves the environment. We have taken steps to improve how we set out this 'Environmental Destination' in our dWRMP24. During periods of low rainfall, when there is a risk to the environment, we are required to reduce abstraction in high-risk locations to protect the environment. To ensure we continue to meet demand we use drought permits and demand reduction solutions in a tightly regulated way to balance supply with demand and protect the environment. All drought permit applications are subject to statutory assessments (SEA, HRA, WFD) by our regulators and receive the same level of scrutiny as any other WRMP options. We will only ever look to	Please see Section 5.4 on sustainable abstraction and section 10 on Water Supply in our Technical Summary.

	put permits or licences in place if 1) we agree that it is absolutely needed and 2) if it is environmentally sustainable and permitted by the EA.	

ID Reference: 063	**West Country Rivers Trust**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
We agree whole-heartedly that the solution to the challenges faced is to build significant resilience on the supply side as well as significant reductions in demands across all sectors, but we are deeply concerned that the current level of understanding is insufficient to predict the exact level of pressure on our rivers. The recent revision of the Environment Agency's prediction for South West Water resources, moving from one of surplus to deficit, coupled with the 2022/23 drought, seems to have caught the South West off guard and the immediate response has been to abstract more from our rivers as this is the easiest option. Whilst this has for the most part been done in consultation with local stakeholders, the continual abstraction and introduction of drought permits, which then become permanent, is not sustainable and will lead to significant environmental losses.	We continue to work with all our partners and regulators to improve our understanding of how the challenges we face might impact water supply and the environment both now and in the future. Our WRMP includes a rigorous forecast of future water supply, and we have a statutory duty to meet the demand for water while also achieving sustainable abstraction that protects and improves the environment. We have taken steps to improve how we set out this 'Environmental Destination' in our dWRMP24. During periods of low rainfall, when there is a risk to the environment, we are required to reduce abstraction in high-risk locations to protect the environment. To ensure we continue to meet demand we use drought permits and demand reduction solutions in a tightly regulated way to balance supply with demand and protect the environment. All drought permit applications are subject to statutory assessments (SEA, HRA, WFD, etc) by our regulators and receive the same level of scrutiny as any other WRMP options. We will only ever look to put permits or licences in place if 1) we agree that it is absolutely needed and 2) if it is environmentally sustainable and permitted by the EA.	Please see Appendices 1 and 4 on water supply forecasting and options. See also section 5.4 of our Technical Summary on sustainable abstraction.
The complexity of the situation underlined by the detail, breadth and depth of the water resource plans make it hard, bordering on impossible for anyone to understand the actual likely changes to abstraction on each river and stretch. Without this we have no idea if current plans are sufficient to meet the ambition of supplying water, both to local and tourist residents as well as non-domestic customers, without further degrading our rivers.	We are working with the EA to further define requirements for each waterbody and have improved our narrative within the WRMP to present our position more clearly.	Please see section 5.4 of our Technical Summary on sustainable abstraction.
The Westcountry Rivers Trust would like clearer summary expectations stated for each river on the likely volume of flow abstracted for both public and non-public supply, both currently and predicted and the expected river flow within the river throughout the year. More information is needed on the actual abstractions within the catchment rather than abstraction licenses. This should be designed carefully with stakeholders to make the data more accessible using descriptive statistics (graphs, charts and maps) as well as infographics. The deep dive pilot catchment reports within the West Country Water Resource Group portal are a good start, but they are still too complex, especially as the text and figures are split out. Improving the accessibility and clarity of what is known and what isn't known, to improve individual river	We acknowledge that we need to improve how we communicate the supply and demand forecasts, and our plan to meet our Environmental Destination for sustainable abstraction that protects the environment. We are also keen to co-design these outputs collaboratively with our stakeholders and welcome your offer of help with this task. We also welcome your feedback on the Focus Catchment Pilots undertaken under the auspices of the West Country Water Resources Group. This approach was always intended to be the first step in a more in-depth collaborative investigation of water resources challenges and solutions at a catchment-scale across the whole region, and a series of follow-up projects are now underway to build on this initial work.	Please see Appendices 1 and 4 on water supply forecasting and options. See also section 5.4 of our Technical Summary on sustainable abstraction. Information about how we are working

predictive consumptive use, will make it easier for local groups to understand the impact on their river and to collaboratively work to reduce negative impacts.		within the WCWRG is found here.
Work with the Trust to create clear river by river graphics on the expected consumptive use on our rivers set against the environmental flows needed throughout the year and guidance on what to look out for when a river is in stress so these can be used with the Trust's river community groups and incorporated into the Trusts Citizen Science Investigation program. This needs to incorporate more research into the actual abstractors within the rivers, not just abstraction licenses. This could also include wider initiatives such as increasing river name signage on bridges and advocating for communities to co-create their own river charter/blueprint.	We are fully committed to taking an integrated catchment approach to the management of water as a vital resource for people, businesses and the environment. We are also keen to co-design our communication outputs collaboratively with our stakeholders and welcome your offer of help with this task. SWW has followed the rapid growth of citizen science recent years with great interest, and we are working closely with our partner organisations and the local catchment partnerships to explore how we can best support them as they seek to expand the scope of their citizen science programmes among local communities.	N/A
One element missing from the plans, which has now been acknowledged in Defra's Plan for Water, is acknowledgement of the challenge of working in siloed systems reinforced by government silos, siloed regulation and lack of inertia through continuity of the status quo. This is not isolated to water companies and despite the overt ambition, the Trust believes across the water sector there are significant silos in government flood risk management funding and environmental river protection as well as water company water quality provision, including drainage water management, and water resource planning. The reliance on highly predictable single benefit engineering solutions with a high degree of certainty, versus the inherent uncertainty of multi-site multi-benefit Nature Based Solutions needs acknowledging as does the challenge in procuring delivery groups that can knit together funding from across all silos to deliver Integrated Catchment Management.	Our WRMP and PR24 Business Plan include measures that will build our expertise and capacity to deliver catchment- and nature-based solutions that contribute to water resources and resilience outcomes. You rightly raise the need for greater understanding of non-public water supply demand in catchments and this remains a key focus of our WRMP demand baseline/forecasting work and of the West Country Water Resources Group, which has recently commissioned research to assess the scale of this use and how it is being used.	Please see Appendices 2 and 5 for details of demand forecasting and demand options respectively. Information about how we are working within the WCWRG is found here.
Include the challenge of delivering new community-led and Nature Based Solutions funded across multiple silos that have different planning cycles, funding requirements and delivery windows. Specific attention needs to be paid to Nature Based Solutions being designed out at the long list stage due to their uncertainty in modelling and focus switched to proportionate monitoring, reporting and verification of local outcomes.	Our revised WRMP24 sets out our approach to the use of catchment and nature-based solutions to contribute to meeting water resources challenges. We have incorporated a significant programme of catchment management and nature-based solutions for water resources and resilience benefits into the PR24 Business Plan and accompanying Long Term Delivery Strategy. These investments will primarily be delivered under the auspices of the collaborative Upstream Thinking scheme, but also via the wider natural resources investment programme (for ecample, peatland restoration) and the 'green first' framework. In addition, a WINEP investigation to evaluate the water resources benefits of catchment management is also planned in AMP8, and we have secured £1m funding from the Ofwat Innovation Fund with WRT to deliver the Water Net Gain project, which will undertake research into farm business and water supply resilience across the region.	Link Section 7.6 of the Technical Summary sets out our approach to resilience using NBS. More information about our environmental protection and enhancement work is available here: nature-based-solutions
Lead discussions with the EA and Local Authorities to create a collaborative Nature Based Solution Non-Governmental Organisation framework to pull together multiple funding routes to deliver flood, drought, water quality and	We have been fully committed to adopting a partnership and co-creation approach since 2006, when the Exmoor Mires Project began and have subsequently established the Upstream Thinking Partnership and played and	More information about our environmental

biodiversity using an Integrated Catchment Management approach and Nature Based Solutions aligned to the Defra Plan for Water. Co-create water resource management plans and commit to taking a more holistic and integrated approach to water management, 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. You need to provide ring fenced funding to Catchment Partnerships, and designate consistent water company representatives with sufficient authority, power to access data and influences to pull together funding streams and drivers from across the business to ensure joined up thinking.	active role in the region's catchment partnerships since their inception. We are also active members of several other collaborative groups, including the Local nature Partnerships; the Devon, Cornwall and IoS Nature Based Solutions Working Group; the Devon, Cornwall and IoS Climate Impacts Group; Coastal and Estuary Partnerships and several others. We agree with you that catchment partnerships are going to play a vital role in facilitating a collaborative holistic approach and we are actively working to increase our engagement with and contribution of resources to these groups.	protection and enhancement work is available here: nature-based-solutions
There is a growing interest in our rivers, shown by the increase in the Trust's Citizen Scientists Investigations, wild swimming and more general public access of our rivers. Funding is needed to support these groups to be advocates for the river, push for funding to deliver change, expand the water-saving community to instigate further monitoring and empower river action groups. The Trust helps groups become more consistent and robust in their approach to data collection, targeting of action and delivery of simple habitat works. These mini-river action groups could become a significant delivery force, especially if coordinated through the Trust. They can provide a level of locality and interest not easily replicated through paid staff within the county or regional NGO network.	We have followed the rapid growth of citizen science in recent years with great interest and we are working closely with our partner organisations and the local catchment partnerships to explore how we can best support them as they seek to expand their citizen science programmes among local communities. As you know, we have welcomed the opportunity to work with Westcountry Rivers Trust to explore how we could support the development of your flagship Westcountry Citizen Science Investigations scheme. We agree that, for the citizen-collected data to realise its full potential impact, there was an urgent need for greater volunteer training, more robust data collation and analysis, and clearly defined reporting mechanisms. We are keen to continue our collaboration with you and look forward to working with you on the Ofwat Innovation Catchment Systems Thinking Cooperative – CaSTCo) Project.	Appendix 8 details our approach to working in partnerships across our region. More information about our environmental protection and enhancement work is available here: nature-based-solutions
Work with the Trust to fund a Water Resilient Community Fund and sustainable expansion of the Citizen Science Investigations scheme, increase the number of community groups and improve access to training resources in monitoring and understanding their local river, as well as being more robust in targeting and delivering habitat works. The Trust feels strongly that there is not sufficient environmental or community representation at a regional level and, since the River Basin Liaison Panels were disbanded, there is little collaboration of Catchment Partnerships at a regional scale, or into the West Country Water Resource Group.	We agree that these community-based approaches are an important element of our approach to environmental surveillance and demand-reduction. We also recognise the importance of catchment partnerships and are committed to increasing our engagement with them. Our Director of Natural Resources now chairs the Cornwall Catchment Partnership and we have committed additional resources to support catchment partnerships, local nature partnerships and estuary/coastal partnerships across the region. In addition, following a governance review, a new environmental working group has been established under the auspices of the WCWRG specifically to increase the representation of environmental or community groups at a regional level.	Please see Appendix 8 on Customer and Stakeholder Engagment. Information about how we are working within the WCWRG is found here.
The Trust is leading a Horizon project called InnWater to increase engagement between Catchment Partnerships and feed Citizen Science water quality data into the West Country Water Resource Group so it can be understood. As part of this the Trust CEO is willing to sit as a member on the West Country Water Resource Group as our remit and area is broadly synergistic with the region and we work closely with other rivers trusts, NGO's and community river interest groups. SWW should support this offer.	We completely agree and following a governance review, a new environmental working group has been established under the auspices of the WCWRG specifically to increase the representation of environmental or community groups at a regional level. Plans are already well underway for you to play a leadership role within this working group and the WCWRG Steering Group.	Information about how we are working within the WCWRG is found here.

Whilst we whole heartedly agree with the ambition to managing future flows in an integrative and collaborative manner to ensure sufficient water for people and the river, we remain deeply concerned. The plan is dependent on increasing supply and reducing demand but the recent changes to future scenarios, from surplus to deficit, demonstrate the risks of increased demand are very real and will significantly impact river health. Work is needed to build river resilience. Each river reach is important and top-level catchment assessments often fail to reflect local conditions, especially with issues such as migration barriers for fish, so detailed assessments are required as well as significant work to make our rivers as resilient as possible and ensure sufficient flows.	We wholeheartedly agree with you that building the resilience of the water environment to low flows, in combination with other pressures, is of paramount importance. This was the primary conclusion of the regional environmental destination analysis undertaken in 2022. To meet this challenge, SWW have incorporated a significant programme of catchment management and nature-based solutions for water resources and resilience benefits into the PR24 Business Plan and accompanying Long Term Delivery Strategy. These investments will primarily be delivered under the auspices of the collaborative Upstream Thinking scheme, but also via the wider natural resources investment programme (e.g. peatland restoration). In addition, a WINEP investigation to evaluate the water resources benefits of catchment management is also planned in AMP8, and to expedite the mainstreaming of catchment and NBS for water resources outcomes we have secured £1m funding from the Ofwat Innovation Fund to deliver the Water Net Gain project, which will undertake research into farm business and water supply resilience.	Please see the information in section 5.4 of our main Technical Summary. Information about how we are working within the WCWRG is found here.
Increase the level of river and fisheries monitoring and planning through Catchment Fisheries Plans to allow sufficient understanding of current aquatic species including fisheries assessments and actions that will increase habitats and species resilience. This needs to include a fish in distress monitoring scheme and fish rescue team that can work alongside the Environment Agency. It should also support low flow monitoring through the Citizen Science Investigation network.	We are keen to support the creation of Catchment Fisheries Plans and are committed to working in partnership with local delivery organisations, catchment partnerships and government agencies to meet our statutory duties in relation to eels, freshwater migratory fish, and maintaining healthy and resilient fish stocks. The recruitment of specialist fisheries expertise into SWW is evidence of this commitment.	Appendix 8 details our approach to working in partnerships across our region.
Develop and integrate funding routes to deliver catchment scale resilient river habitat work, including weir removals, fish passage design for <Q95 levels, cool rivers shading, bankside habitat creation, acidity control, invasive species control and, where needed, gravel management to maximise invertebrate and fisheries production. This could include stage zero river restoration schemes and could articulate well with getting rivers 'Beaver ready' where widening the space for water de-conflicts these areas if beavers colonise river reaches.	We are committed to delivering all our statutory responsibilities with regard to fish pass and abstraction screens in the next AMP. SWW will also continue to support and commit to all the reservoir mitigation/ planning and other work to management and enhance fish habitat. The recruitment of specialist fisheries expertise into SWW is evidence of this commitment. Furthermore, the new partnership catchment schemes developed for the Hampshire Avon and Dorset Stour for AMP8 have been designed to include exactly the approach you have recommended.	Please see Appendix 8 on Customer and Stakeholder Engagment.
Develop a suite of fisheries water banks to hold back for key periods of drought to manage environmental pinch points and ensure sufficient flows for threatened, iconic or economically important species in collaboration with local groups and partnerships. This could be extended beyond using the regions reservoirs into the creation of a distributive bank of water stores using farm ponds and lakes.	W already hold back fisheries water banks in our reservoirs that are designed and managed to protect freshwater migratory fish, and to help maintain healthy and resilient fish stocks in river reaches impacted by our assets. We are interested in your idea to extend this to include a distributed bank of water stores and are pleased to be collaborating with Westcountry Rivers Trust on the £1m Ofwat Innovation Fund Water Net Gain project, which will explore the potential for these distributed water stores to support river flows and benefit fish populations.	More information on the Innovation Fund award is found here: water-net-gain
A key concern is the ability to deliver catchment resilience to increase supplies. There is a lot of focus on technical engineered solutions, such as water shunting, quarry reuse and desalination but considerable work is	We acknowledge your point here and very much agree with the need for an integrated catchment management approach. See comments about our NBS and catchment management ambitions.	More information about our work restoring natural

needed to reverse the catchment changes seen over the last 50 years aligned with drinking water, waste and flooding drivers. We have pushed for Integrated Catchment Management for the last 30 years and sat on catchment partnerships, local nature partnership and regional flood and coastal committees. This integrative approach delivers multiple funder outcomes and can maximise broad societal benefits for a specific cost, as opposed to delivering single engineered items at the lowest cost. Understanding of how Nature Based Solutions can deliver water resource protection needs to developed as per flood risk management and water quality benefits. However projects like PROWATER1 and Co-ADAPT 2 have demonstrated value and how to target and deliver both rural and urban measures. The Trust and the wider Upstream Thinking partnership is incredibly well placed to develop, design and deliver and new Outcome Delivery Incentive for water resource protection and deliver this against the current water quality schemes, such as on farm water surface storage and augmented aquifer recharge.		environments is available here: nature-based-solutions
Work with the Trust and Upstream Thinking partners to design a bespoke water resource performance commitment and implement and monitor water resource protection measures, such as soil management, tree planting and wetland creation across all drinking water abstraction points as part of the PR24 Upstream Thinking 4. This needs to include understanding the grant rates and farmer contract terms to increase update and schemes should then be fully implemented within the RP29 Business Plan.	We welcome this idea and are keen to explore the potential for a non-statutory performance commitment or metrics to monitor the implementation of measures which deliver water resources outcomes. An example of this type of approach already exists in the form of a non-statutory Biodiversity Scorecard that was developed for the PR19 Business Plan and used for monitoring in AMP7. The monitoring tools required to monitor these metrics also already exist and could be adapted for this purpose. As stated previously, we have incorporated a significant programme of catchment management and nature-based solutions for water resources and resilience benefits into our PR24 Business Plan and Long Term Delivery Strategy.	More information about our environmental programmes is available here: nature-based-solutions
Work with the Trust's Rainshare programme to co-design and deliver urban-focused schemes to increase surface water flow retention, reduce potable water demand and alleviate hosepipe use during dry periods. This could work well alongside the water butt program providing shared community facilities as well as link to work on rural and urban Sustainable Drainage System (SuDS) schemes reducing surface water into the Waste Water system.	Thank you for your comments. The WRMP focuses on water supply whereas our sister strategy, the Drainage and Wastewater Management Plan (DWMP), is focused on the risks and options for managing wastewater and drainage issues. We have passed your comments to our colleagues working on this plan.	More information on the DWMP is available at: drainage-and-wastewater-management-plan
Build capacity across catchments and tributaries where future abstraction schemes are expected in advance of potential use.	We agree with this approach, and it has already been implemented in some locations. For example, the River Lyd and Hawks Tor Pit catchments are already covered Upstream Thinking, and there are plans for the South West Peatland Partnership to target interventions into upland catchments above drinking water abstractions.	More information about our work to protect and enhance the the environment are available here: nature-based-solutions
Work with the Trust to deliver the Water Net Gain proposal to build a distributive network of 1,000 ponds and lakes within abstraction zones to be used for local agricultural demand management, downstream abstraction a	We are very pleased to have secured £1m of funding from the Ofwat Innovation Fund, in partnership with Westcountry Rivers Trust and others, for the Water Net Gain Project. Like you, we recognise the need for additional	More information on the Innovation Fund

water bank augment flow during extreme droughts and fish rescues. Additional funding is required to persuade farmers to take these options and annual management payments may be required as well as one off capital payments, to ensure permanent land use change.	funding to be brought to bear if this innovative approach is to be successful and look forward to working with you to determine which mechanisms could be used to secure it.	award is found here: water-net-gain/
Further work is needed on the recycling and reuse of water, specifically within the agricultural sector so specific attention needs to be paid to auditing water provision and usage within agriculture and needs to be taken seriously and be of high interest to the agri-food sector. The Trust is able to assist as it coordinates the Tamar Water Stewardship Business Board works across the region on water related issues within the supply chain. This same approach could be used within the Tourism sector and the Mining sector but is not provisioned for within the Water Net Gain project.	Our revised WRMP includes a series of investigations and trials to explore the potential for water reuse and recycling and other demand management solutions to achieve water efficiency outcomes in the SW regions key sectors: agrifood, tourism, mineral extraction and energy production. We have already begun to engage with these sectors and being long-standing members of the Tamar Water Stewardship Business Board has been extremely helpful in expediting these conversations. We are also keen to determine what contribution nature-based solutions can make to environmental resilience, demand reduction and to reducing potable water use by non-household customers, and this will part of our WINEP investigation into the water resources benefits of catchment management in AMP8.	Please see section 4 of our Technical Summary.
The aims for Water Net Gain and the Tamar Water Stewardship Business Board need to expand to surveying high water use businesses across the region to understand vulnerability and improve farm resilience, especially within the dairy sector. Specific focus should be paid to the opportunities for storing rainwater and reusing water supplies either day to day or during periods of drought with grants offered to help farmers reduce use of the potable network. Where such water-harvesting interventions are assessed to be unfeasible or would not provide adequate enough supplies, alternative water reuse/recycling/reclamation schemes should be assessed and considered, such as sewer mining and direct reuse where remote/local WWTWs are at capacity. The current level of ambition for water reuse in the plan is disappointing, especially in relation to agriculture.	Our revised WRMP includes a series of investigations and trials to explore the potential for water reuse and recycling and other demand management solutions to achieve water efficiency outcomes in the region's key sectors: agrifood, tourism, mineral extraction and energy production. We have already begun to engage with these sectors and being long-standing members of the Tamar Water Stewardship Business Board has been extremely helpful in expediting these conversations. We are also keen to determine what contribution nature-based solutions can make to environmental resilience, demand reduction and to reducing potable water use by non-household customers, and this will part of our WINEP investigation into the water resources benefits of catchment management in AMP8. In addition, in AMP8 we will also be undertaking investigations and trials to scope out further opportunities at various scales for water reuse and/or recycling.	Please see section 4 of our Technical Summary.
In Israel, 85% of reclaimed water is used in agriculture. Work with The Trust to scale and trial the approach for agricultural effluent reuse for the South West region. This will further increase water resource, urban drainage/sewerage system and river resilience providing additional contributions to 'best value'. Reuse is potentially more robust, reliable and resilient than abstraction licence changes and potentially more cost-beneficial than leakage reduction when additional benefits such as reduced overflows/CSOs and improved river health are factored-in. This approach will align with RBMPs, Catchment Management Plans and Catchment Partnerships.	We are currently developing proposals for pilots and further research to work with agriculture and other sectors to identify feasible options to develop non-potable supplies, alternative water sources and storage opportunities, and other ways to reduce the demand for potable water.	Appendix 5 sets out the future trials as we work towards WRMP29
Work with the Trust to set up large scale demand management programmes where we work with community river groups to drive local campaigns and funding drives to reduce usage as well as increase and normalise re-use of water. This could include wider elements such as Yellow Fish campaigns to show which drains lead to the river rather than waste water treatment works.	We firmly believe that our delivery partners and other local organisations specialised in communication and engagement, have a vital role to play in helping to promote sustainable water use behaviours among residents, visitors and businesses across the region. We are aware of the excellent work undertaken by the Westcountry Rivers Trust and similar organisations and are	More information about our work to protect and enhance the the environment are available here:

This action represents a significant opportunity to improve EDI engagement and ensure as much as possible of public and society is represented in water/river-focused groups. Alongside wider public demand management the Trust is also well placed to work with non-domestic sectors to reduce demand and this could easily form part of the Rivers Trust-wide Replenish approach increasing water audit and efficiency measures. It is a lot easier for a third party to do this compared to the water company due to conflict of interest with retail for business. This could definitely be integrated within the Water Net Gain elements discussed in Action 13 but could be broadened into non-agriculture sectors, such as energy production, mining and tourism.	keen to explore opportunities for further collaboration in this area. Stakeholders repeatedly ask us to work with natural processes and increase our use of nature-based solutions, and we have adopted a 'green first' approach. This means that we will consider the potential contribution that nature-based (green and blue) solutions can make to solving water management challenges before we consider traditional engineered (grey) solutions.	nature-based-solutions Please also see Appendix 8 on Customer and Stakeholder Engagement
Develop an approach to other high consumptive sectors. The Trust could help with this, but other organisations more tightly aligned with sectors may be better placed.	We have developed a range of targeted NHH demand-side options, specifically targeting high-consumption sectors or businesses. We are currently piloting some work with the Agri-food sector, looking at identifying longer-term solutions to minimising potable consumption through a range of initiatives which may include: rainwater harvesting, developing local non-potable sources, or other non-potable options.	Please Section 9 on Demand Management in our Technical Summary. More information on Water Fit is here: waterfit
Citizen-consumers want to play a bigger role in the protection, restoration and celebration of our water environments. Providing best value should ensure full representation of communities but this is not mentioned or even alluded to in the plan. You should map diversity and inclusivity more explicitly in order to comprehensively assess whether the plan represents 'best value'. It should embed the circularity and regenerative principles as now referenced in the Plan for Water.	Thank you, we support this approach and we look forward to working with you as we deliver our plan.	Please see Appendix 8 for our commitment to working in partnership with a wide range of stakeholders.
You should take steps to understand the risks of losing current and future work force skills through the 'silver tsunami', shifts in supply chains and innovative approaches towards less hard-engineered solutions. Altogether, this will mean you work force will need to look significantly different in 2035. If you want to deliver true 'best value', you need to be ahead of the curve in co-designing, co-creating and co-delivering Future Water Visions today. You should work collaboratively to co-create an inclusivity and diversity strategy with a programme for education, apprenticeships, stewardship and training through which to interconnect ambitions around water supply and demand management options, building on work to increase capacity and capability in designing, delivering and monitoring Nature Based Solutions through an Integrated Catchment Management approach.	We welcome this idea and are keen to explore it more with you. We are fully committed to supporting training and apprenticeships and, since 2017, we have fully funded over 400 apprenticeships in a wide variety of roles. In addition, in November 2020, we supported 50 placements through the Government's Kickstart programme, designed to improve social mobility. Like you, we are keen to build capacity and resilience in the NBS supply chain, as this could emerge as barrier to mainstreaming the use of NBS and could become a rate-limiting factor in their use to meet water management challenges.	More information about our apprenticeship programme is available here. Information about our Kickstart programme is here: careers
Engineers can, and should, provide sector specific solutions, but we have significant doubts, based on extensive experience, that these groups have the capability to build catchment scale resilience. Given the starting point is from an engineering background, it is not surprising the current plan focuses on	Stakeholders repeatedly ask us to work with natural processes and increase our use of nature-based solutions, and we have adopted a 'green first' approach. This means that we consider the potential contribution that nature-based (green and blue) solutions can make to solving water management	N/A

engineered solutions, but all the tools, organisations and partnerships exists to co-deliver environmental solutions and balance all options. This is not only true for catchment supply resilience and river habitat resilience, but also for public and community resilience (through engagement on demand management and community empowerment), as well as co-creation of resilience across infrastructure and policy domains. If all you have is a hammer, everything looks like a nail. We need a wider array of tools and a wider array of organisations who can wield them.	challenges before we consider traditional engineered (grey) solutions. Having said this, there is currently insufficient evidence for the accurate quantification of the water resources and resilience benefits these solutions deliver, and further research will be required before they can be included as feasible options in the WRMP. To meet this challenge, we will use the Ofwat Innovation Projects (Mainstreaming NBS, CaSTCo, Water Net Gain) in combination with our own programme of investigations (WINEP and other research projects) to gather this evidence before the development of WRMP29 and the second Regional Water Resources Plan.	

ID Reference: 066 **WildFish**		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
South West Water's consultation for its draft Water Resources Management Plan (dWRMP) is inadequate. The water company has failed to provide answers to questions submitted by WildFish on the 9th March during its statutory 12 week consultation period. WildFish has still not received answers eight weeks later. WildFish asked for a follow-up meeting with water resources experts but no attempt has been made to arrange this meeting. Chaser emails were sent on the 20th and 23rd March. SWW responded on the 23rd asking for more time as "the people managing the drought response have been extremely busy in recent weeks". No answers were received. WildFish emailed South West Water on 6th April requesting an update. South West Water responded with incomplete answers on 11th April – instead prompting WildFish to visit its and the government's website for the full answers. The answers are not available on either site. WildFish articulated this to South West Water on 12th of April and re-formatted the questions so there could be no margin for error in its response. WildFish has not received any answers since. WildFish sent a member of staff to South West Water's stakeholder forum on the 26th of April requesting an update. Answers were not provided on the day, but were promised as soon as possible. WildFish has not received any communication on this matter since. Without additional information, WildFish is unable to ascertain where the extra water supply (required to maintain a water supply surplus) is coming from. The dWRMP is insufficient without further clarification. Thus, WildFish is unable to consult or respond effectively on South West Water's supply and demand balance.	We have followed the government's guidelines for the statutory public consultation of our WRMP. For example, it was well publicised through press and social media as well as through open webinars and via presentations provided to local interest and focus groups. This Statement of Response is the mechanism through which we communicate how the points raised during the consultation period have influenced our WRMP. We are not obliged to answer specific questions and points raised during the consultation period other than those that are part of our business as usual work and activities where we always endeavour to respond to queries in a timely manner. We believe that we have been fully transparent regarding the extent of the information set out in our draft WRMP for the public consultation. However, we acknowledge that you feel more information should be made available to enable you to provide a detailed response. As this is the case, we confirm that we will meet with Wildfish to answer the questions and take these into account as we finalise the WRMP for a final consultation later in 2023.	N/A

South West Water was unable to manage the conditions experienced in the South West last year. South West Water has admitted to being 'caught-out' last summer. How could this have happened? There is a statutory obligation on South West Water to review its WRMP annually. Accordingly, the plan should have been updated if it ceased to be based on accurate information. South West Water and the Environment Agency (EA) are responsible for setting supply and demand target figures. Crucially, the figures making up South West Water's WRMP19, for 2022, were inaccurate which resulted in several drought permits being approved across the South West to maintain water supplies for 2022 and 2023. The environment has paid the price for South West Water's oversight.	We have followed our published drought plan on our actions to maintain supply in adverse weather conditions last year. Further information on the options that contribute to managing the Supply - Demand balance are provided in our revised WRMP. We meet our statutory obligations, which are to meet the needs of all of our customers, businesses as well as the environment in adverse weather conditions.	Our Drought Plan is available here: drought-plan Our revised Technical Summary sets out our supply and demand forecasting, options and how we have taken all this into account. Appendices 1, 2, 4 and 5 provide more detailed information.
WildFish does not understand why South West Water needs to include desalination if there is already a water surplus. Water companies have to produce 'best value' plans. If the draft plan already has a water surplus, then adding desalination into the final plan does not fit with the best value model. Customers pay for these plans and the investigatory work that will go into the planning of the desalination units. The alternative conclusion, drawn from desalination's late inclusion, is that South West Water is hesitant over the accuracy of the supply and demand figures its draft plan is based on. Given South West Water's WRMP failed in the summer of 2022, this reluctance to rely on the figures is to be expected.	Our Annual Performance and Regulatory Report, 2023, describes our current position, our progress on the WRMP19 plan and our end of AMP7 baseline position in more detail. This aligns to our resubmitted WRMP24.	Appendix 6 explains this in more detail. Our 2022 Annual Report is available here: annual-reporting-2022
To maintain supplies in the summer of 2022, South West Water applied for several drought permits. The amount of extra abstracted water, applied for, amounted to nearly 10 billion litres. The EA approved these permits. WildFish's analysis suggests there was limited modification between South West Water's application and what was approved by the EA. South West Water is now proposing to convert drought permits into new abstractions and abstraction licence changes. Drought permits are temporary solutions to maintain water supplies during drought. Drought permits should not be used as a basis for South West Water to argue for increased abstraction.	We use drought schemes to deal with difficult periods and to reduce the likelihood of needing to use drought measures. We have introduced additional supply options since our drought plan across all water resource zones and approximately 50 additional options to give us more permanent water supply.	Please see Appendix 4 and Appendix 9.
The EA would trigger a very dangerous precedent if it approved an abstraction licence change which was based on a drought permit application. South West Water have referred to 'spare water' throughout its stakeholder engagement events. There is no such thing as spare water. This terminology needs to be removed.	The approval of abstraction licences, whether permanent or temporary, is a matter for the EA. Water companies have a statutory duty to ensure there are secure and safe water supplies to meet both the needs of their customers and the environment.	Please see section 5.4 in our main Technical Summary on sustainable abstraction. Appendix 1: supply

		forecasting provides details on our forecasting for water supply in each of our WRZs.

ID Reference: 070	**Woodland Trust**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
We fully understand the need to supply water to people however, the installation of new facilities and provision of water could have a detrimental impact on the environment if not managed well.	We agree. All proposed schemes will undergo a full Strategic Environmental Assessment as an essential element of developing the proposal and this takes multiple factors into account including positive and negative societal, economic, cultural and environmental impacts.	Please see Appendix 6 to see how we have evaluated the options to arrive at our Best Value Plan.
There are options to do more and be more ambitions. The Woodland Trust is keen to see you embrace nature based solutions over hard engineering and to pioneer these solutions. The provision of our public services, including water should enhance our public goods - the environment.	We agree in principle and are keen to work with organisations such as the Woodland and Rivers Trusts through the mechanisms provided by the Catchment Partnerships and our established forums to consider a wider range of environmentally based options for the future.	Information about our work protecting and enhancing the environment and the organisations we work with is on our website: environment
The construction of new facilities can impact irreplaceable habitats. Ancient Woodland is an irreplaceable habitat, covered by paragraph 180 (c) of the National Planning policy framework. All proposals which affect ancient woodland should be considered with regards to the Woodland Trust's planners manual including but not limited to: o Guiding principles of Avoid Harm, establish unequivocal evidence of need and benefits, provide biodiversity net gain o Adopt the precautionary principle of a minimum buffer of 50m between any proposal affecting land use and ancient woodland. o Reference to be made at initial proposal stages to the ancient woodland inventory and the ancient tree inventory for any potential impacts on ancient woodland, ancient and veteran trees and o Consult with the Woodland Trust as to any impacts on woodland or trees as these sources of information have limitations.	We completely agree with your point. Thank you for your feedback. We take our statutory duties in relation to the protection and improvement of priority habitat, designated sites (of all types), biodiversity and nature recovery very seriously. This is reflected in our new Biodiversity Strategy and environmental Enhancement Cases that will form key elements of our PR24 Business Plan.	Our Biodiversity Strategy is available here: biodiversity-strategy-report
You should continue supporting the SW Peatland Partnership and make the water environment more resilient by planting trees and using nature based	We are fully committed to investing in whole catchment management, peatland restoration and natural solutions for water resource management. We also acknowledge our responsibility to support Local Nature Recovery	Information about our work protecting and enhancing the

solutions. The environmental impact of repurposing quarries needs careful consideration.	Strategies (as set out in recent legislation and the Government's Plan for Water), deliver Biodiversity Net Gain (and improvements to the environment). Our revised WRMP, PR24 Business Plan and Long Term Delivery Strategy are aligned with these requirements.	environment and the organisations we work with is on our website: environment
You should increase the roll out of smart meters, free water butts and water saving devices to encourage people to know more about their water usage and to see the affect of using less. Work with government to make water saving shower heads the norm for purchasing. Campaigns around single use plastics, the 3p's and use of household detergents and chemicals to enable better water management.	Our revised WRMP details our plans and timescales for rolling out smart meters to household and non-household customers to enable more awareness of water use which should facilitate reduced water consumption and reduced costs. We have on-going campaigns on environmental issues and are always pleased to work in partnership with other organisations to enable further reach into, and resonance with, local communities.	Appendices 2 and 5 set out our demand forecasting and options which includes NHH metering and water efficiency proposals.
It feels like the right balance has been struck between supply and demand. However you can always do more. The plan should be accelerated to ensure that our water resource is resilient to the impact of climate change and biodiversity loss which is well underway. The targets must be reached quicker so more can be achieved in the future.	Thank you for your support. We would like to accelerate our plans and achieve more for our customers and the environment more rapidly. However, our ability to do so is dependent on the funding settlements we receive through the PR process and our customers willingness to pay for our work programmes. We collaborate with a wide range of organisations to co-design, co-fund and co-deliver schemes that will deliver shared objectives with mutual benefits that will make the most effective use of joint resources.	Please see our Technical Summary on demand management and the preferred plan. More details of the PR process is available here.

4. Private businesses and water retailers

ID Reference: 062	**Arqiva**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
We welcome South West Water's focus on AMI smart metering and encourage an ambitious approach to the rollout of AMI from AMP8. AMI provides water companies with hourly data on the amount of water delivered to a property, 24 hours a day, 7 days a week, with data transmitted securely from water meters to water company data centres.	We have considered both AMR and AMI smart meter upgrades as part of our feasible demand-side options and intend all meter upgrades will be AMI smart meters due to the additional benefits delivered per meter.	Please see Appendix 5.0 and Appendix 5.1 for full details of all feasible metering options
To achieve the necessary reductions in water consumption and ensure consumers can fully realise the benefits, water companies and households must be empowered with the real-time data smart meters provide. The draft WRMP outlines the proactive replacement of meters with new AMI smart	We have reassessed our best value demand side strategy. Our feasible demand options comprise a full range of smart-metering options. We have a requirement as part of the Water Resources Planning Guidelines, to	Please see our Technical Simmary on demand management. More

meters to provide enhanced consumption and leakage information over a 10-year period so that the benefits are realised and continue into the future. We encourage an ambitious rollout to ensure the benefits are not delayed. Government and the regulator also have important roles to play in enabling companies to deliver the benefits of smart water metering and we note the recent draft award under Ofwat's Accelerated Infrastructure Delivery Project.	demonstrate that implementing smart metering from 2025 is the best value choice. Once our decision-making is complete, we will update this position as part of our revised submission.	information, in provided in Appendix 6: Best Value Planning Approach and Methodology

ID Reference: 009 **Everflow**		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Business (NHH) customers use around 30% of water supplies, but water efficiency work has focused heavily on reducing household use. We would like to understand how the 9% demand reduction target for NHH will be applied in practice with more details about NHH smart metering and water efficiency plans. Business customers' involvement is essential to meeting the demand reduction targets, but NHH have low awareness of water scarcity threats and how this could affect their businesses. Business customers and employers are in a prime position to influence their employees' behaviour.	We have developed a range of NHH options, including smart meter upgrades, and have assessed the optimum best value options as part of our revised WRMP24. We haven undertaken further engagement with retailers and business customers as part of our PR24 consultation activity and have used this feedback to shape our plan-choices.	Please see Appendix 2 for detailed information.
Recent research by Artesia for MOSL found a strong business case for rolling out smart meters to NHH customers and recommended replacing or upgrading meters, particularly the largest NHH customers and businesses. Ensuring that customers' usage is visible and water scarcity is proactively communicated and linked to usage, is key to getting customers to understand their potential contribution towards reducing scarcity and protecting the environment. We therefore alignment with the national NHH metering strategy being developed by MOSL.	We have looked at smart metering options within the NHH market as part of our revised WRMP and have assessed the costs and benefits of all feasible NHH demand-side options.	Please see Appendix 2 for detailed information.
Smaller NHH customers use water in a very similar way to households (toilets, sinks, etc.) and have similar meter sizes and usage. We would like clarity on how many smart meters (AMI not AMR) you intend to deploy in AMP8 and beyond, including visibility for retailers on when and where they will be rolled out.	We have considered a range of NHH demand-side options, including the provision of smart metering. Our revised plan sets out the number of NHH businesses that will receive smart metering (AMR / AMI) as part of our recommended best value plan.	Our Technical Summary discusses the number of NHH meters planned to be upgraded. Appendix 5: Demand Options discusses our intent to continue to engage with Retailers, and our intention for further

		work to investigate the upgrade of larger NHH meters for WRMP29.
We would like you to align with the national NHH metering strategy position on data sharing. Proactive logging and continuous flow / high usage alerts for customers via retailers are key to obtaining 'in the moment' conversations about water efficiency with which NHH customers are more likely to engage. Smart data should be shared with the retailers to enable them to provide better targeting of water efficiency and leakage services, and pooled for national benchmarking.	We have recently contributed to MOSL's National Benchmarking Study (through the Leeds Institute for Data Analytics) in sharing 15 minute flow data from our 621 existing SWW loggers and are open to continuing to work with MOSL and retailers on the mechanism for sharing this data more openly in a transparent way in the future. Flow data is already shared with our retailers and business customers for ongoing monitoring of usage and leaks, and we will continue to support these data requests, whilst the overall mechanism and process is embedded.	Our Technical Summary discusses the number of NHH meters planned to be upgraded. Appendix 5: Demand Options discusses our intent to continue to engage with Retailers, and our intention for further work to investigate the upgrade of larger NHH meters for WRMP29.
National research (RWG Water Efficiency sub-group) has shown that NHH incentives to increase water efficiency are insufficient and the savings are unrealistic. There is low demand for water efficiency services among businesses - even when they are offered for 'free'. The time and money required to achieve water efficiency relative to size of the bill is a particular barrier to SMEs, the majority of the NHH market. We would therefore like more detail on how water efficiency services will be offered to different categories of NHH customers so that we can offer a consistent nationwide approach for water efficiency services that is simpler for NHHs to engage with, especially multi-site customers who need clarity about the services and funding and/or incentives available to them. A collaborative approach is key to improving this through coordinated communications with retailers.	As part of our drought-response, we have been trialling a range of options with our NHH customers / retailers, to help incentivise / fund investment in water-saving initiatives. We will continue to develop and pilot this option to inform medium term opportunities for greater demand-side savings from additional incentivisation / funding.	Appendix 5 - Section 5 - states our intention to continue to develop water efficiency measures with NHH retailers.
Not all retailers will prioritise water efficiency services, but those that do should be able to provide competitive services and innovations that benefit customers, the retail market, the environment and security of supply. A recent trial targeting NHH customers with continuous flows, we demonstrated the value of our enhanced data and relationship management by more than tripling the usual engagement rate. However, incentive schemes for retailers have been based on per litre usage reductions. This is inadequate to provide commercial retailer incentives. Therefore market rate funding should be transferred to retailers to cover engagement, marketing, service delivery,	We welcome the opportunity to continue to build relationships and collaborate with retailers and are open to discussions around how adequate funding is made available to incentivise and deliver water-saving. Through our response to drought, we have been trialling a NHH innovation fund, where retailers and NHH businesses can apply for funding for delivery of water-saving ideas - we intend to continue to pilot this work to inform options for inclusion in our WRMP29.	Appendix 5 discusses our intent to continue to engage with Retailers, and how we intend to do further work to investigate the upgrade of larger

contact list costs and the costs of improving and enhancing the quality of the data used to deliver NHH water efficiencies.		NHH meters for WRMP29. More information on the NHH innovation fund is available at: water-net-gain
We would welcome a more detailed plan for delivering demand reduction in the NHH sector and a commitment to greater collaboration with and support for retailers. This could involve technical support with abstraction options, providing a policing function regarding responding to retailers about potential leaks and / or offering white label services for leak detection and repair, water efficiency site surveys, installing water efficiency products and sharing plans for smart meter/logger data and roll outs. However, we believe a competitive market for these services would serve customers best, so do not think you should offer these directly to NHH customers.	South West Water recognises the significant challenge in supporting NHH customers to reduce demand in order to meet the prescribed Government targets. As concluded by the Retailer Wholesaler Group, Water Efficiency Subgroup in 2022, we acknowledge that it is necessary for wholesalers and retailers to find ways of working together. We collectively need to find a balance that gives retailers access to water efficiency funding, opportunities to support their customers to foster growth in this area, and to reward those already delivering but does not prevent wholesalers meeting their water efficiency performance commitments. Additionally, we support the view within this report that retailers must work with wholesalers in the delivery of water efficiency but must not be allowed to act as a barrier to the delivery of the underlying requirements. Our view is that smart metering is critical to helping NHH customers understand their water efficiency, to assess the impact of interventions and to monitor progress. Hence, this will be a significant focus for us for supporting a reduction on NHH demand over the coming years.	The demand management section of our revised Technical Summary sets out our intentions to continue to work with retailers on water efficiency in the NHH sector. More information regarding the Retailer Wholesaler Group, Water Efficiency Subgroup in 2022 recommendation is available here.
Retaining TUBs and NEUBs for peak demand or droughts is regrettable for our customers, but if they must be used, we ask that the plan details how retailers will be involved in customer communications around these. Ideally communication protocols should be agreed in advance so that they can be sent out in a timely and organised way.	We notify retailers about TUBs at the same time as the publication of the notices, giving 14 days' notice. We would do the same with NEUBs. Whilst we wouldn't expect the retailer to issue communications on our behalf, supplementary communications from the retailer will always help to get the messages out to customers. We already have some well established communication channels with retailers, for example via the Wholesale Account Manager who is responsible for managing the relationship with the various NHH Water Retailers. However, we are also working to collaborate more closely with retailers and are currently undertaking research with them to help us better understand their perspectives on a variety of issues including drought measures and demand management options.	Information about how we work with our business customers and retailers is found here: businesses

ID Reference: 032	**Market Operator Service Limited**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
We are pleased to see some commitments to the NHH market in your draft WRMP, including targeted initiatives to drive greater water efficiency for NHH customers in target sectors. We are, however, disappointed that the metering section currently only covers household metering. Defra confirmed in late January there must be a nine per cent water reduction target for NHHs by 2038 and should be referenced in the WRMP. The NHH market can, and should, be making a proportionate contribution to your water reduction targets. In your final WRMP, we would like to see a clearer acknowledgement of the role the NHH market has to play to reduce water consumption and clarity on your NHH smart metering and water efficiency commitments. Considering that the NHH market accounts for 30 per cent of water consumed in England, it is essential that key points are included in the main document. Business customers have a key role to play in supporting the industry meeting its demand reduction targets, but their awareness of water security challenges remains low.	We have expanded our NHH water efficiency activities as part of our NHH strategy. We recognise the significant challenge in supporting NHH customers to reduce demand in order to meet the prescribed Government targets. We acknowledge the target and our strategy to meet this target will be in our final submission. As concluded by the Retailer Wholesaler Group, Water Efficiency Subgroup in 2022. We acknowledge that it is necessary for wholesalers and retailers to find ways of working together. We collectively need to find a balance that gives retailers access to water efficiency funding and opportunities to support their customers to foster growth in this area, and reward those already delivering but which does not prevent wholesalers meeting their water efficiency performance commitments. Additionally we support the view within this report that retailers must work with wholesalers in the delivery of water efficiency but must not be allowed to act as a barrier to the delivery of the underlying requirements. Our view is that smart metering is critical to helping NHH customers understand their water efficiency, to assess the impact of interventions and to monitor progress. Hence, this will be a significant focus for us for supporting a reduction on NHH demand over the coming years."	Please see our Technical Summary section 7.4 on demand management. Please also see the Retailer Wholesaler Group, Water Efficiency Subgroup in 2022 recommendation here.
There are no NHH smart metering commitments in the draft WRMP which only has HH commitments yet there is a significant opportunity for NHH water efficiency which could address a large proportion of the market's water usage through a targeted programme of smart meter replacements or upgrades (AMI, AMR, smart loggers, etc.). Smart meters can help identify what percentage of the water used by NHH customers is continuous flow – and a large proportion of this could be leakage and/or wastage. MOSL commissioned research from Artesia Consulting established a strong business case for rolling out smart metering to NHH customers at the same time as domestic customers. It recommended large-scale meter investment programmes to replace or upgrade NHH meters, particularly the largest customers. At the same time, one million smaller NHH customers consume the same amount of water as households and can be effectively managed in the same way with meter replacement programmes, water conservation advice and devices to minimise costs and maximise economies of scale. Clarity on the number of smart meters you intend to deploy in AMP8 and beyond is needed with visibility for retailers on when they will be rolled out and where, and how water efficiency services would be offered to different	We recognise the importance of NHH metering in supporting wider demand side savings and have developed a range of NHH metering options in our revised WRMP. We have clarified the number of smart meters in our best value plan detailing how services will be offered to the range of NHH customers to ensure retailer plans can be fully aligned.	Please see Appendix 2 and Appendix 5 for detailed information on metering. See also Appendix 6: Best Value Planning Approach and Methodology

categories of NHH customers – multi-site, industrial customers, commercial/offices.		
The final WRMP should make greater use of the research by MOSL and the Metering Committee, recognising the size and importance of the NHH market and its role in reducing water demand and wastage, the benefits of NHH smart metering and making meter data available to retailers and customers. Where appropriate, cross-reference the findings of other water companies smart meter rollouts to support smart meter proposals and the scale of water saving opportunities. You should clarify 'customer' references as either households, NHHs or all customers.	We have revised our NHH demand-side strategy to consider a wide range of options, including smart metering. We have used the data and research provided by MOSL to help inform this strategy and reviewed other company's draft submissions to help inform our NHH metering options.	Please see Appendix 2 and Appendix 5 for detailed information on metering. See also Appendix 6: Best Value Planning Approach and Methodology
A country-wide approach to demand reduction should be followed, regardless of whether water company regions are designated as being 'water stressed' or not, recognising all areas have local demand challenges.	We recognise that all areas have demand-side challenges, and that addressing demand-side savings in other zones or regions can help address supply-demand deficits through enabling water transfers or trading. We are continuing to work collaboratively with retailers at a local and national level and we will continue to explore ways to improve national reporting through our evolving Regional Planning process.	Please see Appendix 5 on our intent to investigate the upgrade of larger NHH meters for WRMP29

ID Reference: 065	**ESP Water Limited**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
ESP Water Limited is a new NAV (New appointment and Variation company) and we have been granted variations to our appointment to become the Water and Sewerage Undertaker to new housing developments in this region. We are also growing fast and expect to have further sites soon. We are very supportive of this regional plan and the collaboration undertaken with many stakeholders in the region, but it is not evident if you have worked with NAV companies. We recognise that the supply and demand calculations have included these sites, as future housing developments have been included in the planning, but if demand management measures are not undertaken here then this will impact the incumbent companies' targets. As the NAV market is growing rapidly and the size of the sites increasing, we feel the contribution by NAV companies should be considered in this plan.	At the time of collating this plan there were no NAVs providing potable water supply to customers in our supply area, so consultation was not required. In recent months, 33 NAV connections have been added to our billing files and we shall record demand data as a potable export from 2023/24 onwards.	Section 5.3 in Appendix 2 discusses NAVs

ID Reference: 053	South West Infrastructure Partnership	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
In general, we support the methodology adopted and the current recommendations set out in the company's 'Best Value Plan'. In particular are the commitments to providing resilient infrastructure and water resources to meet all the needs for homes, businesses and the environment and support the long-term economic health of the region whilst meeting the challenges of climate change and reducing the carbon impact of your operations and investments. However, we note that you considered 157 potential schemes, rejecting 57 and pausing progression on 19 in the SWW WRZs and rejecting 16 and pausing 6 in the Bournemouth WRZ. We look forward to understanding more about the 25 paused schemes in your revised WRMP.	Thank you for your support concerning our options appraisal process and methodology. We describe that in detail in our plan. We have provided more detailed information regarding the potential schemes and why some have been rejected and some paused in the reiteration of the WRMP.	Please see Appendix 6 on our best value appraisal information.
Concerning the supply of water to Fawley refinery, you state that consideration of a desalination plant has been rejected as previously dismissed by regulators, presumably the Environment Agency, when a similar proposal was submitted by Southern Water. This seems premature, since different circumstances and benefits will have applied in the Southern Water case, and environmental and economic considerations, including the requirement to meet net zero (for the water sector voluntarily by 2030) will mean regulators should now take a different view. This proposal for Fawley would release in excess of 10Ml/d to support the supply side. It is one of two schemes rejected in the Bournemouth WRZ that could deliver that volume. Of a further five that could, three have 'significant uncertainty for acceptability from environmental reasons' and another one for complexity and cost. We note your commitment to develop a diversified mix of water resource solutions including effluent reuse and desalination. We would therefore promote further consideration of a Fawley desalination scheme rather than rejection based on previous criteria that may no longer be appropriate.	We will be looking at the feasibility of desalination and continue to look to identify new options through our appraisal process. Any proposals for new infrastructure will be discussed in full with all relevant interested parties as part of developing a detailed plan.	Please see Appendix 4 and Appendix 4.1
You will be considering desalination options for the Colliford WRZ, specifically at a number of locations along the Cornish coast, to deliver 10Ml/d. Clearly desalination in the UK is a controversial solution, but changing constraints around conventional water resources requires forward looking and innovative approaches. We presume the company will be proposing renewable energy sources for any future desalination plant.	We have an ambitious commitment to be carbon net zero by 2030 and, in 2022, switched to 100% electrical energy supply from renewable sources. We have also published our commitment to achieving net zero. This includes our route map timetable of when activities will be delivered. We are constructing A and D cell animation schemes at Par. The first treatment facility is due for delivery and operational use in early 2024, with the second treatment module increasing capacity.	Our Net Zero plans are set out in the PR24 plan and the detail on carbon metrics in the WRMP are in Appendix 4. More details on renewable energy can be found at: accelerate-net-zero

		Our commitment to achieving net zero is here: net-zero-plan
We support the £184M investment proposed to meet the 50% leakage reduction target by 2050, saving 34Ml/d in the next 25 years, together with the £57M for metering during AMP8. These investments combined are significantly in excess of the proposed investment for supply-side options. There needs to be confidence that both leakage reduction and the meter installation programmes will deliver the expected savings. However, we note that the company's draft plan focuses only on household customers. Non-household customers account for around 30% of consumption. It makes sense therefore to prioritise smart metering for those high use business customers, not just for household customers. Promoting and delivering water efficiency clearly requires the ability to measure consumption before and after any intervention. Moving customers from unmeasured to metered charging and the proactive replacement of existing meters with smart meters is therefore a positive move.	Thank you for the comment. We are currently considering the optimum balance between demand-side and supply-options to provide sufficient certainty in delivering a sustainable and resilient water supply. We have a minimum obligation to deliver demand-side reductions and specific leakage targets which drives a very sizeable investment in leakage interventions. We have ensured that any additional water required to meet our supply-demand need is provided by the optimum best-value options. This may be additional demand-side savings or the development of new supply side schemes.	Please see the Technical Summary document on demand management
We support your proposal to champion recycling and reuse, focusing on supporting households to utilise rainwater harvesting and greywater systems thus reducing potable use as a means of meeting the Government's 110 litres per person per day target.	Thank you for supporting this proposal. We are currently developing the scope of work for a wider programme of piloting in AMP8, looking at develop further opportunities to reduce potable water demand through re-use, rainwater harvesting and other non-potable solutions.	Please see section 9.3.1 in our main Technical Summary.
We suggest there is an opportunity, working with Retailers, to support businesses with rain water harvesting (RWH) and grey water recycling. Large retail units or distribution depots with extensive roofs and impermeable parking areas are a prime candidate for RWH that could reduce potable water consumption whilst have the added benefit of delaying high rainfall impacts on the sewer network, potentially reducing CSO discharges.	We already have some well-established communication channels with retailers, for example via the Wholesale Account Manager, who is responsible for managing the relationship with the various NHH Water Retailers. We are also working to collaborate more closely with retailers and are currently undertaking research with them to help us better understand their perspectives on a variety of issues including drought measures and demand management options. In line with this, we have made funding available to retailers to support water efficiency investments. We also launched our SWW Water Efficiency Innovation Fund in 2022 and is open for applications from NHH customers in key target areas. It is our intention to develop ever closer working relationships with water retailers in the region to support businesses on water efficiency measures to reduce water usage and associated costs.	Information about how we work with our business customers and retailers is found here: commercial-services

ID Reference: 048	UK Water Retailer Council	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
At market opening, it was anticipated that competition between retailers would drive the provision of water efficiency support to NHH customers. This hasn't been the case. It is apparent that there are neither sufficient incentives on customers to drive behaviour change and demand for water efficiency support from their retailers, nor are there sufficient incentives on retailers and wholesalers to provide it in the absence of customer demand. Even if there were demand, the lack of granularity of consumption data makes it difficult for NHH customers to assess potential benefits of water efficiency interventions or measure the benefit of any such intervention. To achieve the environmental target of 9% (245 Ml/d) by 2038 will require a step change in data quality and availability in the market and potential changes to the regulatory framework.	We share your view that there needs to be a step change to the regulatory framework and for incentives to drive water consumption / demand savings within the NHH market. We have included a range of options for the NHH in our revised draft plan, including smart meter upgrades, and working with retailers to deliver business efficiency audits, leakage audits and process-efficiency audits, with consideration of partial funding towards any required intervention.	Please see Appendix 5 on our intent to investigate the upgrade of larger NHH meters for WRMP29
According to MOSL, some NHH properties are still not metered, around 75% of metered properties are fitted with legacy 'dumb' meters and there are around 179,000 'long-unread' meters, including almost 24,000 dating from pre-market opening. In total, almost 14% of the NHH meters have not had a meter reading entered onto CMOS (Central Marketing Operating System) for 12 months or more. Without the funding to overcome this significant data quality and availability impediment, the ability to progress water efficiency and demand reduction in the NHH market will be constrained. The WRMP and PR24 Business Plan present the opportunity to address this legacy issue which is holding back the market and resulting in a major cause of customer complaints. The draft WRMP implies that you aim to achieve universal smart metering by 2035, though it is unclear to what extent, if any, you will include NHH customers in this rollout. However, we note you are currently developing your strategy for NHHs and will engage with retailers and business customers as part of this. We recommend you roll out smart metering to all NHH customers and ensure all medium and large meters are 'smart' or smart-enabled.	We acknowledge your view that smart meters are a significant enabler to a wider range of benefits and efficiencies, including water-saving initiatives. We have considered a NHH metering strategy as part of our revised WRMP and	Please see our Technical Summary section 7.4 on demand management
If you are unable to pursue large-scale smart metering rollout to all households and NHHs, then you should prioritise ensuring all medium (25-50mm) and large (>50mm) NHH meters are smart in AMP8. MOSL data shows the number of medium and large meters for South West Water is just under 6,200 accounting for around 8% of the company's meter asset base. We are concerned that without the availability, quality, granularity and timeliness	We support the ambition to install smart-meters for all medium to large NHH customers. We have circa 17000 across the SWW and BNW areas. We need to complete further study to understand the technical complexity and associated cost of these smart meter upgrades on these large meters. For this reason, we have been unable to include these >25mm diameter meter	Appendix 5 discusses our intent to continue to investigate the upgrade of larger

of consumption data from smart metering you will not be able to achieve the Government's 9% target reduction in NHH demand by 2038. CCWater has also recently published a report on smart(er) metering which found strong support for a broader rollout of new water meter technologies. Businesses expect smart water meters to become commonplace, with time and financial savings strongly outweighing any perceived drawbacks. We look forward therefore to seeing your proposal for smart(er) metering for NHH customers in your final Plan.	upgrades in our WRMP24 but will be developing a revised business case for inclusion in WRMP29.	NHH meters for WRMP29
We welcome your proposals to set up a water efficiency scheme targeted at NHH customers through partnerships with retailers, and your inclusion of retailers within the collaborative agri-food, food and drink and tourism working groups. It is, of course, retailers who have the primary relationship with the NHH customer. Business sectors are targeted based on the high potential for water savings. We support this approach, but would reiterate that without the timely, granular and accurate data from smart metering, NHH customers will be limited in assessing the potential or success of any interventions, especially to process use. There will though need to be financial recognition of the additional costs of such activity from retailers, that will in addition reduce their revenue streams.	We are assessing a more comprehensive set of demand-side options specifically targeted at NHHs, including smart meter upgrades. We are undertaking a range of engagement activities with retailers and NHH customers and are considering a number of pilots schemes in AMP8, to look at ways to incentivise both retailers and HH customers to implement water saving activities. The pilots are in the early phase of being defined, scoped and costed. Further engagement is currently being planned as part of this activity.	Please see Appendix 5 for our future plans for pilots and trials for both HH and NHH.
In your final WRMP you should define customers as either household or NHH, confirm that NHH will be included in the rollout of smart meter installation programme which will include water efficiency advice and support, set out the number and type of meters (AMR or AMI) that will be delivered during AMP8, and how you will engage and collaborate with retailers. You should also demonstrate how you have taken MOSL metering research into account together with information from trials carried out by other water companies and the recommendations set out in the Strategic Panel's Interim National Metering Strategy.	We will ensure that we provide clarity on the distinction between HH and NHH customers throughout our WRMP. We are assessing a more comprehensive set of demand-side options specifically targeted at NHHs, including smart meter upgrades. We are undertaking a range of engagement activities with retailers and NHH customers and are considering a number of pilots schemes in AMP8, to look at ways to incentivise both retailers and HH customers to implement water saving activities. Our final best value plan provides clarity on the total number of smart meters that will be implemented as part of WRMP24. We have carried out a comprehensive review of the findings of Strategic Panel's Interim National Metering Strategy and have incorporated these wider benefits into our decision making process on our revised best value plan.	Please see Appendix 2 and Appendix 5 for detailed information on metering. See also Appendix 6: Best Value Planning Approach and Methodology

ID Reference: 008	Waterscan	
Feedback	**South West Water Response**	**For more detail in our revised dWRMP**
On the whole, Waterscan supports the efforts to meet the supply and demand challenges in the coming decades. We support carefully managed investment into improving drought resilience, reducing leakage, and reducing per capita consumption. But a clear, compelling roadmap for meeting every target is needed as the current goals are unhelpfully vague. It is essential to go further and faster than Government-set targets especially as per capita consumption excludes non-household (NHH), undermining the incentives and funding available for improving NHH water efficiency. There is a troubling lack of transparency over how these national targets were chosen and whether they are suitable, challenging or ambitious enough for particular catchments and water resource zones (WRZs). Maintaining shockingly high leakage rates disables customer motivation to change behaviours and sends the de facto message that high leakage is both acceptable and the norm.	Thank you for your general support for these key policy areas. We have clarified our targets and timescales in our revised WRMP including NHH consumption and incentives, where applicable, for NHH water efficiency measures. Our revised plan sets out our approach to these national targets as minimum levels to be achieved and how we will test the impact of doing more or less than these targets as part of our decision making, to ensure we provide a best-value plan. We have a range of demand and supply options that includes the most cost-beneficial options to achieve both government targets and provide a sufficient water supply to meet demand across the planning period. This may drive additional demand side activity.	Further information on our decision-making process is covered in section 8: our decision making process in our main Technical Summary.
We support interconnected action to tackle climate change, for example, through net carbon neutrality goals and taking better care of local ecologies like sensitive chalk environments. We urge strengthening of environmental protections and to measure, disclose, and work to reduce carbon emissions and water footprint through the Carbon Disclosure Project (CDP). There needs to be greater emphasis on innovation to channel investment into preventive measures and scoping projects such water neutral partnerships and developing final effluent reuse possibilities.	We have an ambitious commitment to be carbon net zero by 2030 and in 2022 switched to 100% electrical energy supply from renewable sources. Further details on our commitment to achieving net zero, including our route map timetable of when activities will be delivered is published on our website. We have been working with the West Country Regional Group to understand customer views on the acceptability of effluent recycling as a potable water supply. We are committed to continue working with the Regional Group, our environmental regulators and relevant local planning authorities should water neutrality become a possibility in our region.	More details on our commitment can be found at: at netzero
We expect pollution events to be a much more explicit focus in the WRMP. Failing to adequately acknowledge these events and to provide a transparent, transformative roadmap for how such incidents will be systematically prevented are blatant shortcomings. Pollution events affect the availability of water, the health of society, and the ecological status of river catchments. They also cultivate public distrust and cynicism in the water market, sentiments which are incompatible with positively changing consumer behaviour.	We agree with all the points made. However, this is a matter for our sister strategy, the Drainage and Wastewater Management Plan (DWMP). We have passed your comments to our colleagues developing and managing this Plan.	More information on the DWMP can be found at: drainage-and-wastewater-management-plan
There is significant scope for more intensive, targeted partnership work under the umbrella of nature-based solutions, but it was not made clear how different stakeholders will be engaged and under what terms.	We intend to continue to work in all relevant partnerships to deliver catchment and nature base solutions, many of which are pre-existing with established Terms of Reference and content / meeting schedules. We would not want to duplicate these structures and establish separate working groups unless one does not already exist.	Please see Appendix 8 on Customer and Stakeholder engagement.

Smart metering is presented as broad commitments without providing the detail that is required to inspire confidence. More detail is needed on the kinds of smart meter data that will be available, in what form, from what date, to who, and how, and at what cost this data will be shared. There is also a significant lack of clarity around what smart meter data is expected to achieve, for example, long-term behavioural change. We would like greater critical consideration of the presumed causal link between increasing smart metering and reducing water use needed to justify the £57.4 million investment. Large scale investment in smart metering generates excellent reporting but fails to tackle underlying issues therefore investment should be focused on where there is both opportunity and the need for water reduction, such as the middle sector of the NHH market. We are very pleased to see that South West Water recognises the value of working with Retailers to reduce NHH consumption and to better engage NHH customers on water efficiency. We would like the final Plan to show how these partnerships will work and be managed.	We agree that effort should be focused where there is likely to be the most efficiency benefits and reducing demand. Smart metering for NHH is key to supporting water efficiency measures and reducing both NHH water demand and the costs incurred. Recent Artesia research for MOSL showed a strong business case for rolling out smart meters to NHH customers as it raises awareness of the volume of water used and the associated costs of the supply. We have provided more detailed information about our roll out plans for smart metering in the reiteration of the WRMP and we are strengthening our relationship with our water retailers so that we can work together on NHH-facing campaigns.	Please see section 9: our demand management plan in our main Technical Summary for more information.
Retailers are an untapped resource to help drive down NHH water usage. A mechanism is needed to empower Retailers to offer this service to NHH customers allowing you to focus on deliverables that cannot be achieved by third parties like leakage reduction, net zero, meeting household (HH) targets and reducing pollution incidents.	We recognise it is now the responsibility for retailers to work directly with NHH. We are keen to work closely with our retailers so they can offer effective water efficiency services to NHH customers.	Please see Appendix 5 - Section 5 which shows that our current engagement has been completed and sets out our intention to further engage.
There is a lack of consideration, transparency and clarity over how the Plan will affect other stakeholders, particularly NHH. You have a statutory requirement to protect domestic water supplies over NHH properties but this should not translate into normal operating practice, particularly when NHH customers are proactive in managing and reducing their water use. Supply issues affecting NHH should be analysed and the impacts carefully considered and made transparent.	We agree that our draft WRMP did not include enough information about NHH and water demand / supply / efficiency measures. We have addressed this in the reiteration of the WRMP. Although it is no longer our role to work directly with NHH, we are building vital relationships with our retailers to understand NHH current and future needs so that these are considered on an equal footing with those of our customers and the environment in our Plan.	Please see section 9: our demand management plan in our main Technical Summary for more information.
You need to make greater efforts to fundamentally change perceptions of water as a critical resource. It is perverse that the more water a customer uses, the cheaper this vital resource becomes. You should be much more proactive in reversing these perverse incentives, changing the narrative that propagates, rationalises, and normalises inefficient, irresponsible, and uninspiring performance. Changes to price and/or data alone will not be enough to galvanise the changes needed for the majority of the market.	Water is a vital resource and it's supply is generally take for granted. We believe that perceptions of the real value of water are slowly changing over time. We have developed a wide range of engagement and communications initiatives to underpin this and are working with partner organisations to share and jointly own messages and campaigns.	Please see section 3.1: customer and stakeholder engagement in our main Technical Summary for more information.

Even though South West Water's draft WRMP was published significantly later than most other Wholesaler plans, both the Summary and Main documents were among the clearest and most readable reports. However, for documents very often 100+ pages, it was surprising how often questions were left unanswered at the end.	Thank you. the complexity of the draft WRMP has been raised by others responding to the consultation. We hope we have addressed this in the way we have restructured the republished draft WRMP and that this will make it more accessible for all readers.	Please see our revised main Technical Summary
The Plan highlights the climate change vulnerability posed by the 860 miles of coastline in the area. We would like more details to be provided about how the specifics of this coastal environment are integrated into the final WRMP. It was not clear how net zero for all its carbon emissions (beyond operational emissions) will be achieved by 2045. A much clearer roadmap is needed to show how this goal will be reached. Similarly, we are intrigued by plans for cross-catchment water neutrality, but need to see more detail on timelines and concrete plans for this how neutrality target will be achieved.	Our WRMP is a 25 year long term plan that sets out, in high level terms, the predicted challenges of climate, environmental and demographic changes ahead, as well as our ambitions, environmental destination and how we intend to meet our customers and regulators expectations. We hope we have clarified the issued you have raised in the reiteration of the WRMP.	Please see section 3.3.2: climate change in our Technical Summary for more information.
There needs to be more clarity on how the nearly 4,000 community groups will be engaged with up to 2030. On what basis will this engagement take place, with what aims, what criteria for moving forward, and what intended outcomes? Is this level of community engagement feasible?	Realistically, it is not likely we will engage directly with 4,000 community groups across our region. However, we will be continuing our collaborations with existing structures that facilitate reach into local communities and interest groups. There are many opportunities for customers and communities to engage with us through our working groups and customer forums and we welcome everyone getting involved.	Please see section 3.1: customer and stakeholder engagement in our main Technical Summary for more information.

5. Consumer representatives

ID Reference: 059	**Consumer Council for Water**	
Feedback	**South West Water Response**	**For more detail in our revised dWRMP**
The plan clearly references Government targets around leakage and per capita consumption (PCC) reduction, as well as net-zero carbon emissions. It is good that South West Water is planning to meet these targets by the 2050 deadline. Given the strain the resources in the South West are currently under following the drought in 2022, and the likelihood that this situation will arise again because of climate change, we would like South West Water to show ambition to move beyond Government targets and lead on these issues, as it would free up more resources for the wider South West region.	We are committed to achieving all of our demand reduction targets that will reduce our requirement to abstract as we are very aware of the environmental consequences. Within our best value planning approach, we have considered different optimisation goals considering features including the environmental and carbon impact and the value customers and wider stakeholders place on delivering demand-side savings and leakage interventions. We have tried to ensure to ensure that our leakage ambition is balanced and considers both the need to achieve the minimum government targets whilst looking to maximise wider social benefits where cost-effective to do so.	Please see Appendix 1 and Appendix 6: Best Value Planning Approach and Methodology

The plan is clearly set out and all of the documents were clear. We particularly commend the customer summary version as being an engaging and non-technical, yet detailed read. The use of headings, the logical flow of the subjects, clear scene setting, explanation of targets and use of graphics all help to build a comprehensive document that interested members of the public should be able to readily engage with and understand. Where readers wanted to know more detail on a particular subject, it could be useful to link to the relevant chapter and note the section, for ease of reference. The plan references lots of engagement, with household and non-household customers as well as groups such as the Wildlife Trust, Councils, and Rivers Trust. The plan sets out what has been learned from this engagement in terms of customer views and priorities. To make this clearer, the document could link to research documents, so the reader can reference the source material for themselves.	Thank you. We have included references to relevant source material in our revised WRMP and signposted within the document where this will enhance understanding of the issues and proposed solutions.	Please see section 1.2: "our revised draft WRMP" in our main Technical Summary.
We cannot find any clear table or graphic of the levels of supply and demand now and into the future, showing when demand begins to outstrip supply. Without this being made clear, we cannot be certain of the scale of the issues faced and therefore how appropriate the scale of the proposed solutions are. We would like to see this represented, preferably in the form of a graph, included in the final WRMP so that readers can quickly grasp the scale and timing of the issues. We would like a second graph, showing the supply and demand forecast after the best value interventions set out in the dWRMP, so people can clearly see how investment will address the problem.	We are improving our modelling capability for WRMP29. This will enable a more detailed representation of the supply and demand challenges ahead. As well as being able to illustrate this graphically, we will be able to represent the difference the proposed investment will make. If the modelling outputs are available within the time constraints, we will provide this in the revised WRMP24.	Please see section 11.4: our roadmap to WRMP29 in our main Technical Summary for more information.
South West Water is already focusing strongly on leakage, and we support the company's continued work in reducing leaks, both on its assets and on customer pipes, across its network. The target to reduce leaks by a further 30% will meet the Government's target of 50% reduction by 2050. We would like to see more detail about how it will continue to innovate in this area and learn from other companies, especially as it highlights household support is highest for fixing leaks, and non-household customers feel the company needs to lead by example on this issue.	Our feasible metering options include investment in innovative techniques to find and fix leaks more effectively at reduced costs in future AMPs. This investment is included within our chosen leakage strategy. We have provided further detail on our feasible leakage options and how innovation has been considered in our revised leakage strategy, as part of our Demand-options technical appendix and within our appendix discussing our recommended plan.	Our Technical Summary on demand management (leakage) refers to innovation funding.
We are pleased to see South West Water choosing to install AMI type smart meters in households, as this provides daily consumption patterns, identify leaks and change water habits to reduce consumption. Smart meter installation may also prove key to future successful innovative tariffs. We believe that information from any smart meters made available to customers will be pivotal in how useful it really is, and how that will impact on water usage.	We agree that effort should be focused where there is likely to be the most benefits in reducing demand. Smart metering is key to supporting water efficiency measures and reducing both household and NHH water demand and the costs incurred. We considered both AMR and AMI smart meter upgrades as part of our feasible demand-side options and are proposing that all meters including upgrades will be AMI due to the additional benefits delivered per meter.	Please see section 9: our demand management plan in our main Technical Summary for more information.
We are pleased to see South West Water showing leadership to its customers by scoping and actioning a suite of supply-side options. Customers expect to see companies playing their part in water management if they are to be truly	Thank you for your general support. We find the support we offer to our customers is always appreciated as it helps reduce their water use and reduce	Please see section 9: our demand management plan in

engaged with using water wisely themselves. Offering home visits, water audits and educational/school visits are also important. We know from research that people want to be given useful advice outlining what they can do to be more water efficient, rather than what not to do.	the costs of their water supply. We will continue working with our retailers to ensure NHH also receive this support.	our main Technical Summary for more information.
South West Water explains its plans to recycle water, looking at returning clean, treated water from WWTWs to the network. We know from other water recycling schemes that this can be a challenging concept for customers to understand and can face considerable opposition. The engagement needed with customers for them to fully understand the concept of water recycling and so recognise it as an acceptable supply-side solution will need to be robust. We would welcome more information on South West Water's plans around this.	The Poole Water Recycling Strategic Resource Option is a frontrunner in the West Country for this type of solution. The Regional Group began an extensive customer and stakeholder engagement programme in relation to this in July 2023. This engagement and customer research will build on some initial customer focus groups that were held with Bournemouth Water customers in 2022 and a subsequent review of the literature relating to the social acceptability of water recycling (see key publications from the DWI, Severn Trent Water and others).	Information on the Poole Water Recycling work is available here.
We note that some supply-side options, such as desalination plants, will not form part of the WRMP2024 plan as they will be created within the current period. Nevertheless, we would welcome more information on how the plans were arrived at and considered to be best value, the level of customer engagement on and support for the schemes, and the cost to customers in creating and operating the plants. We hope these will be made clear in the PR24 business plan and would like to see that acknowledged in the final WRMP. We would also like to see a more accurate estimation of the supply to come from desalination. The dWRMP estimates 10ML/d (Chapter 8 Annex C), but there have been press reports of up to 60ML/d, and then more recently, mention of 40ML/d. We expect to see these estimates settled in the final plan.	We have articulated in the revised WRMP the requirement for accelerated the delivery of some of the supply options into the current AMP as a matter of necessity to ensure we are able to meet the water supply needs of our customers in the short term as well as over the medium and long terms. The requirement means there is a potential misalignment with the WRMP19 annual review. However, the next review will explain how the decision was arrived at and our customer engagement regarding the accelerated schemes as well as our current position and where we expect to be at the end of AMP7.	Please see section 3.2: additional investment in AMP7 (2020-25) in our main Technical Summary for more information.
We would like some explanation as to why the boreholes South West Water is considering recommissioning were decommissioned in the first place, and assurance that whatever led to this decommissioning is no longer an issue.	We have considered the potential of recommissioning the Sidford borehole. It was abandoned over 30 years ago because of turbidity issues. Any new or previously decommissioned boreholes would be subject to extensive water quality testing before the DWI would allow us to put the water into service.	N/A
CCW's research shows that there is support amongst business consumers for the roll out of smart water meters and the perceived benefits have genuine appeal. Those aware of smart water meters most readily associated it with financial and time saving benefits, with environmental benefits being less top of mind. However, there are some concerns regarding the installation process as water-essential businesses are very sensitive to interruptions to their water supply and have limited understanding of what the installation process entails. This means communication will be key to the successful introduction of metering as a means of demand management for business customers. We would like to see more in the plan around communication with business customers on metering and water use.	Our view is that smart metering is critical to helping NHH customers understand their water efficiency, and to assess the impact of interventions and to monitor progress. We have noted your valuable points that communication on the process and implication of installation is key to successful implementation and will continue to work closely with our retailers to develop communications for these sectors.	Please see Appendix 2 and Appendix 5 on Demand Forecasting and Demand Options respectively. Appendix 8 sets our plans for Customer and Stakeholder Engagement
We would like to see options and a best value plan for the roll out of smart meters, preferably of AMI type, across non-household customers. We would also like to know more on the plan to target the role out; how South West	Smart metering for NHH is key to supporting water efficiency measures and reducing both NHH water demand and the costs incurred. Recent Artesia research for MOSL showed a strong business case for rolling out AMI smart	Please see Appendix 2 and Appendix 5 on Demand Forecasting

Water will prioritise and target NHH customers – perhaps starting with long unread / unlocatable meters, then highest users?	meters to NHH customers as it raises awareness of the volume of water used and the associated costs of the supply. We have provided more detailed information about our roll out plans for smart metering in the reiteration of the WRMP and we are strengthening our relationship with our water retailers so that we can work together on NHH-facing campaigns.	and Demand Options respectively. Appendix 8 sets our plans for Customer and Stakeholder Engagement
The dWRMP makes absolutely clear South West Water's ambitions to meet government targets on leakage and PCC reduction by 2050, but it is less specific about the targets in place for reduction in non-household water use. Government's 2050 target is a 15% reduction in non-household water use, with an interim target of a 9% reduction by 31 March 2038 (specified in Defra's Environmental Improvement Plan). We would like to see acknowledgement of this target made specifically in the plan, linked to the non-household water saving measures, such as efficiency visits and smart metering, already detailed.	In our revised plan, we have approached these national targets as minimum levels to be achieved, for both household and NHH. We will be testing the impact of doing more or less than these targets as part of our decision making, to ensure we provide a best-value plan. We have a range of demand and supply options and have ensured that our plan includes the most cost-beneficial options to achieve both government targets and provide a sufficient water supply to meet demand across the planning period. This may drive additional demand side activity.	As above, and with further information provided on our decision making process in Appendix 6: Best Value Planning.
The non-household retail market has so far failed to deliver a market for water efficiency assistance for business customers in England. The introduction of a new business demand Performance Commitment by Ofwat for PR24 means there will be greater transparency and an opportunity set challenging targets. However, this measure will not, by itself, deliver demand. We would be interested to know of plans South West Water has to engage not only business customers but also retailers on joined up strategies to help reduce demand.	Our revised WRMP sets out how we will work with our retailers to plan future engagement with NHH sectors on water efficiency to ensure effective assistance measures are provided.	Please see section 3.1: customer and stakeholder engagement in our main Technical Summary for more information.

ID Reference: 030	**National Farmers Union**	
Feedback	**South West Water Response**	**For more detail in our revised dWRMP**
Farming's relationship with the water sector is critical to building our water resilience. We would like to see the WRMP outline the steps that will be taken to safeguard levels of service in water supply to rural businesses. Water supply will be critical for securing growth in the rural economy and we would like to see a focus on rural resilience in long term plans, particularly where they are working with the farming community on wider objectives.	One of the core principles of our plan is co-creation with our stakeholders and wider community. We welcome the opportunity to work with rural non-household customers to understand how our plan impacts them.	Please see our Technical Summary section 3.5 on stakeholder engagement, and Appendix 8 on our Customer and Stakeholder Engagement.

Our thriving horticulture sector is quickly affected by reduced water availability in summer months. This is a particularly important point for livestock businesses and soft fruit crops in particular. Any proposals to alter river flow would have a direct impact on these businesses. The WRMP says you are "seeking to change abstraction licences to better reflect the balance of supply and demand." It is important when discussing any reduction of water availability that the agriculture sector and wider food economy is taken into account. Consideration of the impact of reduced water on the land used to grow food, crops, processing and manufacturing sectors, employment (including casual, part time and full time), economies, tourism and the environment as well as the individual businesses.	We acknowledge during periods of low water availability that sectors can be affected. Those with public water supplies are at risk and we are actively working with agri-food stakeholders to work with them to formulate a plan and resilience to drought for the farming industry.	Please see Appendix 4 and Appendix 4.2
It is essential that the agriculture sector is engaged with regard to potential implications on abstraction licences and water availability so it can build sustainability. It is not acceptable to advise abstractors at the time of licence renewal that changes are to be made to the volume available. The agriculture sector needs time to respond and react to any proposed water availability reductions to ensure all implications of changes/variations and the impact on wider food production is understood by all parties so that the right solution to be implemented. Often time is not available.	We agree abstraction licenses with the Environment Agency and must always remain compliant with these. We fully intend to work with all key sectors in a timely way to ensure all understand the implications of any changes to abstraction licences and have the time, should it be required, to make necessary arrangements.	Please see section 3.1: customer and stakeholder engagement in our main Technical Summary for more information.
What data is being used to underpin the agriculture sector within the regulatory process for abstraction licences. It is important that the sector understands the data source and modelling undertaken and accepts the information being presented for its sector.	SWW is not responsible for the issuing or regulation of abstraction licences that is the role of the Environment Agency, but we do need develop an understanding of all water users needs and the water needs of the environment as we develop our WRMP.	Please see section 3.1: customer and stakeholder engagement in our main Technical Summary for more information.
We believe that there could be significant opportunities to develop water storage features by working with farmers. We would like to see South West Water outline any steps that they are taking to work with farmers to identify opportunities for the construction of multi-use storage reservoirs or on rainwater harvesting projects. There may be opportunities to work together on these projects, particularly in locations where summer supplies and availability may be an issue.	We have developed a range of supply options and continue to identify new opportunities. Our options appraisal process means that we discount some options throughout the process as we undertake environmental and engineering assessments. However, our aim is always to capture every possible option we can. We continue to engage with our stakeholders and customers on potentially feasible options and will use this feedback to shape our plan-choices.	Please see Appendix 4: sections 3 and 4
It should be of the highest priority to meet Water Framework Directive responsibilities and continue to protect the water environment. Our members are continually asked to improve and change practices in order to improve their environmental performance and reduce impacts. Your recent targeted investment in sewage treatment and infrastructure will help deliver reductions in nutrient and sediments. Smaller rural systems must not be forgotten, and	We are fully committed to taking an integrated catchment approach and are keen to collaborate with yourselves and others to better understand the water management challenges we face and how we can collaborate to deliver solutions across the region's catchment landscapes at a wide range of spatial scales.	Please see section 3.1: customer and stakeholder engagement in our main Technical

we must all continue to work together at the catchment level to deliver continual improvements and communicate improvements to local communities.		Summary for more information.
The NFU launched the Integrated Water Management report which highlights the urgent need to ensure water infrastructure can cope with extreme weather events, from flooding to drought. Significant investment is needed in infrastructure to protect farmland and food production during extreme weather events. The creation of a multi-sector integrated water management strategy would help secure a fair share of water for agriculture and establish the agri-food sector as an essential user of water. Catchment management initiatives have been a strong feature of your work for a number of years. This approach to partnership working and delivery continues to work well.	SWW has a statutory duty to ensure the needs of all water users are met and protected, including during extremes conditions of drought or flooding. Our approach to developing the WRMP has been collaborative, and we have worked with all sectors, including agrifood, to understand their priorities for the future. Our WRMP sets out our commitment to delivering catchment and nature based solutions, such as the 1,000 ponds project, and our intention is to continue working with the farming community and landowners to co-create and co-deliver this and other catchment solutions to bring them to fruition.	Please see section 3.1: customer and stakeholder engagement in our main Technical Summary for more information. More information about our work protecting and enhancing the environment with partners is here: environment
The WRMP proposes new reservoirs across the South West to support the growing demand for water supply. The NFU supports the need to expand strategic water supply infrastructure as critical response to climate change and population growth. It is critical that the farming businesses benefit from the additional water resources that new reservoirs will provide. Furthermore, it is important that the design and implementation of new water supply infrastructure and reservoirs does not have an adverse impact on farming businesses and should be carried out in a way that minimises the impact on land ownership and farming operations. We ask that South West Water continues engagement with landowners to ensure they are actively involved in the decision making at all stages.	We are glad you support this. We will work with all interested parties as and when such schemes come forward.	Please see our Technical Summary section 5 on our Supply Forecast
Farmers run businesses and are under increasing pressures from a range of sources to deliver a variety of environmental objectives and this must be considered when planning catchment activities. They have strict regulatory standards and adhere to both voluntary and industry standards to deliver benefits for the environment, businesses and society as a whole. Mechanisms should be developed that enable farmers to choose the best means of achieving these outcomes, ensuring that the true value is reflected in the price paid. There is still uncertainty over how the farming industry can be incentivised to help improve the natural environment and water quality even with the development of the new Environmental Land Management Schemes. SWW should support and engage famers and landowners by incentivising the delivery of nature based solutions to help to create, restore, manage and	There is still uncertainty over how the farming industry can be incentivised to help improve the natural environment to help support water quality. Water companies are required to identify integrated catchment- and nature-based solutions in their WRMPs. These should deliver multiple benefits, for example reducing flood risk and improving resilience of the environment to droughts. It is also recommended that water companies deliver these measures at a catchment scale, either working solely or in partnership with other catchment-based organisations. We have incorporated a significant programme of catchment management and nature-based solutions for water resources and resilience benefits into their PR24 Business Plan and the accompanying Long Term Delivery Strategy. These investments will primarily be delivered under the auspices of the collaborative Upstream Thinking scheme, but also via the wider natural resources investment programme such as peatland restoration.	More information about our work protecting and enhancing the environment with partners is here: nature-based-solutions

protect our wetlands, reduce further demand on water resources, improve soil health, while also increasing additional social and economic benefits.	In addition, a WINEP investigation to evaluate the water resources benefits of catchment management is also planned in AMP8, and to expediate the mainstreaming of catchment and NBS for water resources outcomes, we have secured £1m funding from the Ofwat Innovation Fund to deliver the Water Net Gain project which will undertake research into farm business and water supply resilience across the region.	

ID Reference: 057	**Waterwise**	
Feedback	**South West Water Response**	**For more detail in our revised dWRMP**
Overall we are pleased to see a good level of detail on how future demand has been calculated and the demand management options that have been considered when it comes to household and non-household demand and leakage. It would be good to see the final plan reference the new UK Water Efficiency Strategy to 2030 which the company helped develop.	Thank you. We have refered to the UK Water Efficiency Strategy in the iteration of the WRMP.	Please see section 9: our demand management plan in our main Technical Summary for more information.
We were pleased to see an explanation of the 2022 drought and that recommendations and learnings will provided in the revised plan. The summary consultation document was clearly written and helped explain the plan for a non-technical audience. We encourage the revised plan includes signposting readers to South West Water's existing water efficiency information and opportunities to save water. Engaging in the subject of water resources is an excellent opportunity to empower people with water efficiency information. South West Water could use the opportunity of the final plan promotion to do this.	We agree that the revision of the WRMP provides an ideal opportunity to point our customers towards water efficiency information. We have follow through on this.	Please see section 9: our demand management plan in our main Technical Summary for more information.
We fully support the water efficiency activities presented including the planned programme of targeted home and business water saving visits. The plan has given clear detail of the water efficiency activities and benefits and timescales for delivery. We also welcome the planned leaky loo fix which is an important area worked together on with ourselves and other water companies and the BMA as recommended in our position statement. We are pleased to see South West Water proposing to fit smart water meters for household customers beginning with compulsory metering in the Bournemouth and Isle of Scilly regions by 2035. We encourage South West Water to consider this for NHH. You have good graphs showing the expected reduction in demand from metering, but a clear diagram or table to show your current metering levels and where you intend to get to during the plan would be really helpful.	These comments are really helpful, and we have included more details in the reiteration of the WRMP.	Please see section 9: our demand management plan in our main Technical Summary for more information.

Areas where we think additional investment could be considered are for targeted communications campaigns to raise awareness on a) dual flush buttons as 20% of people incorrectly identify which is the small flush button in their own homes and b) the opportunities saving water brings in terms of reduced bills. As well as water savings the company can highlight associated energy and carbon emissions savings. Further, you could test ways to reduce consumption through new tariffs and rewards for customers.	As part of our Price Review, we are proposing to pilot a number of tariffs and then develop plans for full implementation following assessment of the pilot's results.	Appendix 5, sets out the future plans for Tariffs. The Technical Summary also mentions these plans.
We are pleased government policies such as water labelling of products are recognised in the plan. You could include a budget to support/promote the roll-out of water labelling in AMP8 to explain to customers why water efficiency is important and how they can use the label. The trial of an incentive scheme could also be considered. There are further opportunities to secure additional savings through more ambitious policy-led solutions with regards to new build development and retrofit. We value South West Water's ongoing work with Waterwise to advocate for more supportive policies.	We agree that water labelling is essential to helping customers reduce their water use and we are supportive of any moves towards making this mandatory. An incentive trial to help customers understand the benefits of water labelling and how this could reduce their water use and consequent costs is a valuable suggestion that we will consider including as part of our WRMP.	Please see section 9: our demand management plan in our main Technical Summary for more information.
We are pleased that you have included proactive options to reduce NHH water demand and dedicated work with agribusiness and holiday rentals which is a key economic area for the south west region. South West Water can lead by example by achieving a Waterwise Checkmark for its offices. This is important, especially in light of the government's Environment Act target which includes NHH demand reduction and Ofwat's planned performance commitment which will include NHH demand reduction.	We will be working closely with our retailers on reducing NHH water demand as they have the primary relationship with the business and farming communities. Achieving a Waterwise Checkmark for our offices is vital as we must demonstrate that we are leading by example. We will work towards this goal.	Please see section 3.1: customer and stakeholder engagement in our main Technical Summary for more information.
We welcome inclusion of rainwater harvesting for new developments. The 'Rainshare' community shared resources sounds interesting and innovative. Areas that could be taken forward include incentivising housebuilders to ensure water efficiency in new developments and trialling and roll-out of flow controllers in new builds and working with local authorities and housing associations to install them in social housing.	We welcome your feedback and have extended our feasible demand-side options to incorporate: - working with housing developers to install innovative water-saving devices as part of their developments. - installing flow regulators as part of our smart meter roll-out with an early-smart meter roll-out in north Devon. We agree this offers significant water saving benefits.	Please see Appendix 5: Flow regulators are now included as a feasible option and part of our preferred plan.
New developments in any area with a supply deficit and where abstraction licences are being capped or reduced to protect the environment, should be water demand neutral in the same way as regulators require new developments in flood prone areas to be flood neutral. This could be achieved through proactive collaborative work with planners and developers at a WRZ or catchment level in these sensitive areas.	We support your suggestion of trying to drive towards being water neutral and will look at ways to work with planners, local authorities and communities to incentivise this approach.	Please see section 3.1: customer and stakeholder engagement in our main Technical Summary for more information.

South West Water

Appendix Two

Responses to Strategic Environmental Assessment of our Water Resources Management Plan

Contents

1. Consultation responses relating to SEA

Note:	Our draft WRMP Strategic Environmental Assessment (SEA) Environmental Report was published for consultation in February 2023 alongside our WRMP. To ensure that this SOR provides a comprehensive record of all feedback received from customers and stakeholders on the SEA, the feedback and our responses to these are recorded below. All amendments and updates made to can be seen in Appendix 7 of our WRMP.

ID Reference: 082	**Environment Agency**
Feedback	**South West Water Response**
In the Wimbleball WRZ, one option is to increase the treatment capacity of Pynes WTW to the licence volume, which would be an additional 3.25Ml/d. The Pynes abstraction licence is subject to a PR24 WINEP investigation. Using this source above recent actual volumes could pose a risk under WFD no deterioration.	The WFD assessment for this option identifies a precautionary potential risk of deterioration from this option. The WFD assessment will be updated to acknowledge the PR24 WINEP investigation and that the viability of this option will be dependent on the outcome and associated consultation with the EA.
The WIM8 option is for the company to complete works to enable the permanent use of Brampford Speke boreholes, and would provide a benefit of 2Ml/d. This licence is under investigation in AMP7 as there is a risk of WFD deterioration if used. This investigation has not concluded so there is no guarantee that there will be water available.	The WFD assessment for this option will be updated to include a precautionary risk of deterioration pending the outcome of the PR24 WINEP investigation. Reporting will acknowledge that the viability of this option will be dependent on the outcome of the PR24 WINEP investigation and associated consultation with the EA.
In its WRMP, South West Water have outlined that one of its options is to complete works to enable the permanent use of the Stoke Cannon boreholes. This licence is under investigation in AMP7 as there is a risk of WFD deterioration if used. This investigation has not concluded so there is no guarantee that there will be water available.	The WFD assessment for this option will be updated to include a precautionary risk of deterioration pending the outcome of the PR24 WINEP investigation. Reporting will acknowledge that the viability of this option will be dependent on the outcome of the PR24 WINEP investigation and associated consultation with the EA.
In a meeting in December 2022, the company anecdotally told us that it had used National Framework data to inform its SEA. The Long-term destination guidance sent to regional groups in October 2020 sets out that the data should be reviewed in conjunction with Environment Agency staff due to the number of high-level assumptions used in creating the dataset. This is linked to recommendation 5.3. The National framework data provided was to provide an indication of future hotspots only. As such, we have assessed that the national framework data has been used	National Framework data has not been used in any of the SEA Assessments. Datasets used are listed in Table E.17 of the Environmental Report and comprise publicly available datasets from sources such as Defra, Local Authorities, the Environment Agency and Natural England, in addition to local datasets requested from Local Authorities.

unsuitably in the SEA Chapter.	
In its WRMP, South West Water present a number of supply side options which are linked to designated sites. The company have produced an informal HRA as part of its plan. This informal HRA does not contain sufficient detail for the company to carry out a Stage 1 assessment or Appropriate Assessment. As such, there is not enough evidence to determine the impact of the plan on designated sites. The informal HRA clearly outlines that conclusions cannot be drawn from its assessment, however the WRMP asserts that the HRA indicates no LSE. It is unclear how the company have made this assessment based on the information presented. Additionally, the WRMP guidance, sent to companies, states HRAs including an appropriate assessment should be carried out as part of the companies' plans, if it would likely impact on a European site (section 4.1.1).	At the current stage, there is some uncertainty in relation to specific options where information has not been developed sufficiently to fully identify the degree of potential effects on Habitats Sites from the plan in relation to the HRA. Therefore, additional assessments are required to obtain the requisite amount of information to inform the findings and associated mitigation required for potential effects which cannot currently be quantified. When sufficient information is available it will be reflected in updates to the relevant assessments.
In Chapter 8 App 8.2 South West Water outline all of the supply options it has considered feasible in its plan. Table 0.4 in the SEA sets out which options the company has considered in its SEA. However, there are a number of options in the SEA Table 0.4 which are not described in Chapter 8 App 8.2. These are: · COL20 - New River Fal surface water abstraction · BNW10 - Christchurch WWTW IPR1 Transfer to River Avon · ISMY3 - St Mary's 100% seawater desalination plant · ISMY8 - St Mary's - Increase service reservoir capacity · ISB3 - Bryher - 100% seawater desalination plant · ISB5 - Bryher - Link Tresco and Bryher with pipeline· ISB8 - Bryher – Increase service reservoir capacity · IST6 - Tresco – Increase service reservoir capacity · ISMT1 - St Martin's new groundwater source · ISMT3 - St Martin's – 100% seawater desalination plant · ISMT6 - St Martin's – Increase service reservoir capacity · ISA1 - St Agnes new groundwater source · ISA3 - St Agnes – 100% seawater desalination plant · ISA6 - St Agnes – Increase service reservoir capacity	This comment was already accounted for within the February consultation version of the SEA Environmental Report, rather than the 'work in progress' January version of the Environmental Report which has been commented on. Options outlined within Chapter 8.2 of the draft WRMP correctly match those assessed within the consultation version of the SEA Environmental Report.
In its plan, South West Water display supply side option implementation dates in a number of chapters and in the planning tables. However, on a number of occasions the dates for the options are not consistent. As an example, Chapter 13 says Wimborne transfer to Longham is expected to occur in 2027 which is different to 2045-46 in Chapter 11.	This comment has been acknowledged and consistency checks will be made to ensure dates in the SEA align with Chapter 11.

Section 10.6 of the WRMP guidance outlines the expectation that water companies produce at minimum three programmes for their plans. These are: · Least cost · Best value · Best for the environment and society In its plan, South West Water have presented a least cost and best value programme but have not presented a best for environment and society programme. Additionally, South West Water have included a worst-case programme in its SEA, but this has not been included in its plan. Whilst the company have looked at some programmes in its SEA, South West Water have not considered the best for environment and society in its SEA.	All plans available in Jan/Feb 2023 at the time of writing the Environmental Report were assessed in the SEA. The preferred plan and alternatives are currently being revised by SWW. SEA assessments for all plans will be included in the Environmental Report for the rdWRMP24.
In its Natural Capital assessment, South West Water have provided qualitative options for enhancement and mitigation for its best value plan. However, the do not provide a quantitative analysis of enhancement and mitigation	The quantitative natural capital assessments (NCAs) have been undertaken to understand the likely impacts on natural capital stocks, and resulting impacts on ecosystem services, and, in this way, inform the selection of options for the SWW WRMP24. By reflecting the impacts associated with each option, the assessments have informed the decision-making process and resulted in a reduction of adverse impacts and increase in environmental benefits. The majority of these options are at the concept stage of design and have not been informed by survey data. Therefore, it is not possible at this stage to develop quantitative mitigation and enhancement proposals for natural capital. The opportunities for mitigation and enhancement will be further identified and quantitatively developed in the later stages of design development for each option. It will be important that the natural capital proposals align with both the local ecology (informed by survey data) and the biodiversity net gain proposals, for which opportunity areas have now been identified as part of the WRMP24 reporting but similarly require further design development for detailed quantitative BNG proposals.
As part of the Natural capital assessment, it appears South West Water have qualitatively assessed all the services and, as South West Water have provided some commentary on the monetisation, quantitatively assessed some services. However, there is a lack of required visibility and clarity in the plan to confirm that minimum practice has been applied for each ecosystem service as outlined in the Environment and society in decision-making supplementary water resources planning guidance.	The report will be updated to provide greater clarity on alignment with the WRPG's Environment and Society in Decision-making supplementary guidance (ESDMSG). It should be noted that both water purification and water regulation were assessed qualitatively, but not quantitatively. This aligns with the approach undertaken for the regional investment modelling process, used to inform decision-making and the selection of South West Water WRMP24 options. For water purification, the ESDMSG recommends the NEVO tool as a minimum quantitative assessment. However, in addition to the other limitations noted in the ESDMSG guidance, the tool does not have full coverage of the water resource zone operational areas for the region, including some South West Water areas, and therefore could not be consistently applied across the option assessments.

	For water regulation, as set out in the report, a qualitative approach was undertaken to avoid double accounting of benefits with capacity-based and financial assessments. Furthermore, the complexity of the assumptions required to undertake the assessment would introduce uncertainty into any quantification approach and effectively discount the outputs from being used in decision-making. The EA supplemental guidance recommends, as a minimum approach for quantitative assessment, that the user "consider the value (both to the economy and environment) of water left in the environment for other existing and future users and businesses". A quantitative assessment would require a series of assumptions regarding current value of the water supply (using artificially controlled prices as a proxy for intrinsic value to nature), future availability and future use. The EA guidance then explicitly recommends that the provided method for monetisation is not used for decision making.
South West Water's Natural capital report is lacking transparency the methodology it has used. The sources of all data were provided; however, some ecosystem services are less well documented than others (water regulation and hazard regulation). It is also not clear if the price basis has been made consistent across all ecosystem service to allow for comparison of impacts.	Regarding the use of a consistent price year, the report is currently being updated and further clarity will be provided on the price year used for the natural capital assessment. Regarding transparency, it is agreed that all data sources have been included within the report for the individual ecosystem services. The methodological text will be reviewed for opportunities to increase transparency, including additional text for water flow regulation and a review of the natural hazard regulation text for improving clarity.
In its assessment, South West Water have considered mitigation, enhancement and the habitat units needed to provide 10% biodiversity net gain. The plan does not appear to contain the actual solutions the company would implement but contains things it could do. Additionally, the benefits are only stated and there is no evidence of the options being able to achieve 10% biodiversity net gain. There is also no evidence of the relevant increase in natural capital that comes from the mitigation and enhancement within the options. Additionally, information is included in the report on biodiversity net gain figures associated with the preferred plan indicating a gain of 262.82% units, however certain options in the preferred plan result in a loss of natural capital. The plan has such a large impact on riverine systems that the company could be more ambitious and exceed the legally required 10% biodiversity net gain.	The report has been updated to include a quantitative BNG Opportunity Mapping exercise, which can be used to similarly inform the development of natural capital proposals. The BNG results have been updated following the incorporation of new options. The Environment Act 2021 requires all new developments to deliver a minimum of 10% BNG, and therefore, all new options delivered as part of the WRMP24 will be required to demonstrate at least 10% BNG, subject to the requirements of individual local planning authorities that may exceed the minimum 10% BNG requirement. The BNG Opportunity Mapping exercise can be used to inform the development of those detailed BNG proposals in later stages of option design. The habitats delivered to achieve the 10% BNG should also be designed to support and enhance ecosystem services. As noted in the report, some of the mechanisms for delivering BNG, such as the purchase of biodiversity credits, as well as the individual requirements set by various local planning authorities (LPAs) are still being developed. Furthermore, many of the WRMP24 options are at the concept stage of design and are not supported by survey data, and therefore it is not possible to develop detailed mitigation and enhancement proposals for delivering 10% BNG and natural capital proposals at this stage. The natural capital assessment (NCA) and BNG assessments undertaken for each option have been used to directly inform the selection of South West Water's WRMP24 Best Value Plan, and thus have contributed to the overall reduction in potential impact on natural capital stocks and biodiversity units. South West Water has undertaken a

	mapping exercise for identifying BNG opportunities in greater detail, linking those opportunities with available and forthcoming LPA requirements, and providing the basis for delivering new natural capital stocks that will support both ecosystem services and the local biodiversity that underpins those services.
Section 8.3 of the WRMP guidance lists the information that should be provided for each option. Missing information includes: · Feasible Options Natural Capital · Feasible Options Biodiversity Net Gain This information for the preferred plan on the above matters appears to be included in Chapter 13.	All feasible options were assessed for BNG and NCA as part of the WRMP process and reported in the technical appendices of the SEA Environmental Report. Some options were screened out of the BNG/NCA assessments due to the nature of the options. Please note that the BNG and NCA report had not been updated in the 'work-in-progress' January 2023 version of the SEA Environmental Report. These were completed and published in the February 2023 consultation version.
Chapter 2 sets out the context for the WRMP24 and the WRZs included in the WRMP but does not set out the objectives of the plan. Tables 3.1 and 3.2 in Chapter 3 set out the supply and demand options included in draft WRMP24 (58 supply options and 16 demand options across WRZs), however it does not state the preferred options included in the best value plan to be taken forward. Objectives of the WRMP24 are also not outlined in the SEA. Chapter 11 outlines the preferred plan (Best value option), but in a table form with acronyms for the options to be taken forward, which is not very clear to the reader. A summary of the plan itself would aid the reader in the SEA. Some indicative construction timeframes are referred to in the cumulative effects assessments in Tables 11.7-11.9, but no further timeline is provided in the SEA.	It is acknowledged that the objectives of the plan should be incorporated into Chapter 2, this will be updated for the next iteration of the SEA Environmental Report. The preferred options within the BVP are set out in Tables 10.1 & 10.2 of the SEA Environmental Report. Although acronyms are used in the table, full option names are provided in Table 2.1. A summary of the BVP can be incorporated into Chapter 10 for the next iteration of the SEA Environmental Report to aid the reader. If further construction timelines are available for the rdWRMP24, further detail will be incorporated into tables 10.7-10.9 of the SEA Environmental Report.
SROs were not considered in the SEA framework, and as such their predicted impacts are absent from the Chapter 11 summary tables and narrative. Sections 11.2.2 and 11.2.20 state there are no major negative effects of the preferred plan (at construction and operation). It is unclear whether if SROs were part of the preferred plan whether this would still be the case. In Chapter 10, the company state that 3 additional options have been considered as part of the plan and these have not been assessed under the SEA, HRA,WFD or INNS. It states these assessments were planned in early 2023. These assessments are still required and need to be taken into account in the overall SEA conclusions to influence the final plan selection.	The three additional options were referenced in previous revision of the Environmental Report (January 2023 'work in progress', revision E). Between Revision E and F (February 2023 consultation version) of the report, there were multiple changes to the supply options. These were all assessed and included within revision F. Since this time, further options have been identified and developed by SWW for the rdWRMP24, which have also undergone assessment. Regarding the assessment of SROs, section 8.5.1 of the Environmental Report states 'SROs have already undergone environmental assessment through the RAPID Gate 1 process and these assessments have been used to inform the SWW WRMP24 development'. We liaised with the SRO environmental assessment teams to share approaches and understand effects. The summary of effects of the SROs (based on their SEAs undertaken for the RAPID process) can be found in section 9.8 of the Environmental Report. SROs were also included in the cumulative effects assessment. As the SROs were not assessed using the SWW WRMP24 assessment framework, their SEA results are not included within the plan SEA summary tables. However, it is acknowledged that their effects should be more clearly stated in the plan summaries,

	and additional narrative will be provided in the SEA Environmental Report for the updated plans.
Cumulative effects have been considered at the plan level for the Best Value Plan (preferred plan) and the two plan alternatives (Least Cost and Worst Case). This considers both Intra and Inter project cumulative effects. Inter effects with other plans and projects are set out in the remainder of Chapter 11. However, neighbouring companies WRMPs appears to be missing from the list of plans that have been considered in the cumulative effects. The company only seem to consider neighbouring companies drought plans. Linked to improvement 16.2, it is unclear to what extent the SROs have been considered in the cumulative effects assessment in Chapter 11, given they have not been assessed in the SEA. Finally, it is unclear how the HRA and WFD assessments considered cumulative effects given these were undertaken at the individual option level. Chapter 11 provides some indication of cumulative effects on designated sites, it is unclear how this has been addressed in the HRA.	The cumulative effects of neighbouring water companies, WRMP and Drought Plans were considered within the SEA Environmental Report, within Section 10.5.23. Now that the draft WRMP Plans for Southern Water and Wessex Water have been published, we will expand on cumulative effects further within the next iteration of the dWRMP, as more information is now publicly available. Regarding HRA at the plan level to assess cumulative effects, it is acknowledged that with further information, it would be possible to identify crossover in Habitats Sites, and in-combination effects for HRA could be expanded upon. Cumulative effects assessments for WFD are set out in the WFD Technical Note (SEA Environmental Report, Annex 3). These assessments combine the potential effects for all options which take place within a single waterbody, and assess whether the combination of these options could lead to a risk of deterioration. The comment on SROs within cumulative effects is addressed within response to I16.2 (SROs in SEA).
A PPP review has been undertaken as part of the SEA. However, the PPP review does not appear to include neighbouring WRMPs and Drought Plans and the Regional Plan.	The PPP review now includes the WRMP, Drought Plans, and DWMPs for Wessex Water and Southern Water (the neighbouring water companies). The Draft Regional Plan was already included.
The SEA outlines that the company included a buffer zone around the plan area to capture any additional receptors that may be affected by WRMP24, but it does not indicate the scale of this buffer or include a map showing the overall SEA study area. This is particularly relevant for the geographical area between Bournemouth and Wimbleball WRZs. Later sections of the report indicate a 10km buffer for HRA. The summary included in Chapter 6 covers the main SEA topics to be considered but is quite high level in nature and limited information is provided on condition of baseline. Future baseline is good for some topics, but very limited for others, focussing on national plans rather than geographically specific trends. As an example, water is good but biodiversity is limited. It is also not clear what temporal scope has been considered when describing the future baseline of each SEA topic.	A map displaying the study area can be included within the updated Environmental Report, as well as assessment text regarding cross boundary issues in relation to the SEA topics within the Plan area and clarification on temporal scope of the assessment. Initially within the SEA assessments, designated sites had a buffer of approximately 5km to enable the high-level assessment of the options. The SEA then drew on HRA findings, which utilised a buffer of up to 10km. Impacts are not solely distance based, therefore these distance thresholds were used as starting points. Biodiversity sites were reviewed beyond this initial threshold to identify additional sites which may be connected to or affected by the options. Options were assessed for their full lifetime, not just the 25 years of the WRMP24. Other text suggestions captured within the comment will be reflected within the updated SEA Environmental Report where necessary.
In its SEA South West Water state "*SEA process has directly shaped the option development as environmental constraints and identified risks were used to amend infrastructure locations such as pipeline routes and intake locations, thus avoiding sensitive areas and reducing the need for mitigation*".	Section 8.4 of Revision F of the SEA Environmental Report details how intra-project cumulative effects were considered. Section 8.4.7 states 'In the case that further negative effects are identified, additional mitigation measures have been investigated, or alternative options explored in further detail in order to minimise any affects associated with the WRMP24'.

However, the company has not provided clarity on the content of the WRMP and timings of its actions.	Section 10.6 of the SEA Environmental Report demonstrates how the SEA has informed the draft WRMP in a number of ways, including collaboration meetings with engineering teams, and feeding information back to SWW for option refinement. Furthermore, results from the environmental assessments were fed into the SWW modelling under the environmental element and therefore directly fed into plan selection. This is detailed within Section 10.6 of the Environmental Report. Regarding timing of options, SWW are further developing supply options programmes of works and the associated studies to confirm sustainable abstraction levels, which may revise the timing of these studies. We will clarify in the SEA Environmental Report how the SEA and cumulative effects assessment has influenced the plan.
Mitigation proposals are outlined in Chapter 12 on a plan level. These are very high level and generic in nature, with several of these measures focussed on the construction stage. The mitigation hierarchy is not referred to. It has been identified that there are long term negative operational effects across 11 SEA objectives and a major negative effect during the construction phase in relation to carbon emissions but not clear how these will be mitigated for.	In the February 2023 consultation version of the SEA Environmental Report (rev F), monitoring and mitigation is set out in Chapter 11. The options have undergone further engineering development and environmental assessment since that time for the drWRMP24, and additional option-specific mitigation is now detailed in the environmental assessments and SEA. The SEA Environmental Report will also be updated to include reference the mitigation hierarchy as per the comment. We will also seek to demonstrate where these mitigation measures have informed the implementation of the plan.
Table 12.1 of the SEA sets out the monitoring measures to be implemented. However, there is very little detail on what the monitoring entails, its frequency and how the results will be used to inform future changes to the plan.	It has been acknowledged that further detail is required on SEA monitoring and Chapter 11 of the SEA Environmental Report will be updated to reflect this. We have taken note of the specific further detail required including how the monitoring will be undertaken, potential thresholds for remedial action and commitments to deliver remedial action should these be required.
In its SEA, South West Water state "*The initial Level 2 assessment identified that the scheme presents potential short-term and long-term negative effects in terms of WFD non-compliance to the Stour (Middle) and Stour (Lower) water bodies for both fish, certain chemicals and macrophytes and phytobenthos combined".* The SEA does not provide assurances that, whilst the river Stour is not designated, that the impacts will be addressed.	This comment relates to the Poole Effluent Recycling & Transfer Scheme SRO. The information in the Environmental Report is a summary of the available SRO assessments at the time of writing. The SROs have since undergone further assessment, and therefore this will be reflected in the updated SEA Environmental Report where available.
The river Erme intake relocation option would have benefits not recognised in the SEA. The current abstraction point is within the Dartmoor SAC and does not protect CSMG flow targets and the fish pass does not meet best practice. The river Yealm intake relocation would have fisheries benefits which have not been recognised in the SEA. The current abstraction point has a 2m barrier for fish passage, within the Dartmoor SAC, which has been the subject of a AMP7 WINEP investigation. The existing licence is also on PR24 WINEP for an investigation as the current	It is acknowledged that there may be benefits associated with the River Erme and River Yealm intake relocations. The SEA assessments have been updated to reflect this. It has been noted that it will be important to be precautionary when classifying significance of any benefit, as further ecological and hydrological assessment is required for these options (as noted in the HRA and WFD assessments). The BVP is being reviewed and updated during Summer 2023, so these benefits will be reflected in subsequent updates to the SEA assessments.

conditions do not protect CSMG flow targets. Therefore, as long as the new abstraction point was sustainable then there are significant benefits from this option.	
In its recommended plan, the company includes a SEA summary. In this summary the company summarises the below: · Roadford – water objective 2.1 may be affected as abstraction may result in water quality deterioration. However, the company does not appear to outline that there may be direct impacts as a result of reduced flow, as well as the indirect impact on water quality · Colliford – The company outline that the plan has potential significant effects on groundwater levels and hydrological connections to designated sites. The company does not appear to consider the impacts on flow.	The detailed WFD assessments include discussion of flow implications, and the SEA assessment matrices also include consideration of reduced flows and the associated water quality and direct ecological impacts. The SEA Environmental Report will be updated so that this is more clearly reflected in the summary sections for the plan-level assessments.
As part of its SEA, South West Water have not identified what the short-term impacts on biodiversity and archaeology would be. The company also have not provided information on how it would rectify these impacts.	As per the SEA Framework in Section 7 of the Environmental Report, Biodiversity, Flora and Fauna is assessed in under Objectives 1.1, 1.2 and 1.3. Archaeology is assessed in Objective 6. For every objective short and long term effects are assessed. This includes assessment of the short-term impacts on biodiversity and archaeology. Where effects are considered likely, mitigation measures are provided to reduce or avoid adverse effects. Some of the SEA assessment matrices have now been updated where specific references to biodiversity and archaeology were not made clear within the narrative.
· As part of its WFD assessment, the company do not appear to have considered the risk from INNS. · The company does not outline whether the flows resulting from the options appraised support 'good' status · The company state that more detailed WFD assessments will follow with design developments. We support the need for more detailed assessments. However, it is unclear when these assessments will be done in the timeline of the plan.	INNS risk assessments are included in the WFD assessment. WFD and INNS assessments have been updated for the rdWRMP24. Waterbodies initially classified as High Status under WFD will be reclassified to Good Status if populations of 'High Impact' INNS (according to the current aquatic alien species list produced by WFD UKTAG) are introduced. Significant changes to water quality or flow could change INNS habitat suitability or dispersal, which could impact WFD biological status. These risks are beyond the scope of the INNS risk assessment tool commissioned by the EA but are assessed as part of the WFD assessments. If an option has the potential to lead to changes in river flows then this has been subject to a Level 2 detailed WFD assessment. These assessments look at the details of the changes in flow and whether these changes could lead to a change in the hydrological regime status element (a change from 'supports Good' to 'does not support Good'). Where there is insufficient information to make a clear assessment of this, a precautionary deterioration risk is raised, pending further investigation. SWW will be providing more information in the rdWRMP24 on timescales for option detailed design, supporting assessments and further studies.

In its SEA, South West Water have screened out surface water body from its level 2 assessment for option Ampress borehole development (BNW1). However, Table 3.1 acknowledges that more detailed work is required to prove no connection between confined aquifer and surface water body.	In the WFD assessment, no connection is considered to be present given abstraction is from the underlying confined aquifer. It is considered likely that there will be minimal effect on the surface water body. The option assessment is being updated to include further clarity on hydrological connections, and further Level 2 assessment if needed. The SEA will be updated accordingly if required.
In its plan, the company do provide a detailed monitoring plan. This includes a monitoring plan for: · Cross catchment transfers - INNS monitoring and treatment · Moving effluent either up catchment or cross catchment – Eutrophication risk and relevant monitoring / Water quality deterioration impacts and treatment · Increasing abstraction – flow impacts and changes to flow regimes and so relevant monitoring. · Physical works – damage to environment requiring monitoring of impact and mitigation options. The proposed mitigation for Clockhouse stream as a result of options Christchurch WWTW to River Avon and Christchurch WWTW transfer to Longham Lakes do not appear to be appropriate. The mitigation refers to river erosion control methods which does not seem relevant for the potential impacts of a loss of flow from the existing discharge point. We do not support a 'shrink to fit' approach to addressing abstraction pressures on a surface water body. Also, the existing discharge point is downstream of the confluence with the Avon in the inter-tidal reach not in the fluvial Clockhouse Stream itself.	As part of the production of the SEA Environmental Report and associated assessments, risks and mitigation were assessed using the data and information available at the time of writing. The monitoring plan is currently being updated with additional detail. Mitigation measures for the options noted will also be reviewed.
The Gatherley INNS risk assessment identifies a significant increase in transfer in the Tamar catchment by the operation of the new intake at Gatherley. The new pathway from the Tamar River system, including Tamar lakes, to Roadford will be opened with increased risks for the spread of invasives and potential exacerbation of poor water quality in the reservoirs and the river systems. Gatherley and Tamar Lakes abstractions are screened for INNS at 1 and 2mm screens. This will combat the spread of INNS to between 70 and 90 % of current known INNS species. This does not treat any water for cyanobacterial communities which can be spread around the catchment during licenced abstraction activities and Drought related emergency pumping regimes. The current proposal of 2mm screen was hypothetically tested by Apem. This highlighted that the proposal can be improved to further reduce the risk of invasive transfer. As the report acknowledges, many of the assumptions used in assessing the efficacy of the 2mm screen are untested. Managing the risk of spread of Invasive Non-Native Species through raw water transfers Position Statement April 2022 requires 'no additional risk' for new (Raw Water Transfer) RTW operations. Similarly, the company's SEA outlines that the proposed pipeline from the Stour to Longham lakes poses a risk in relation to the transfer of INNS.	Further detail on mitigation is to be captured within the later stages of scheme design. Assumptions and exclusions explanatory text is to be updated within the next iteration of INNS assessment. Further information will be provided where available to ensure that suitable methods of reducing the risk of transferring damaging organisms across the Tamar catchment and effects of climate change are expanded upon. This will also be reflected in the SEA where appropriate.

In South West Water's HRA, the company outline that the river Stour could be impacted by increased discharge of water and trade effluent from the Christchurch WWTW transfer to Longham Lakes option and the Mendip Quarry SRO. This could lead to changes in water quality from turbidity and also impact on groundwater quality. However, with appropriate monitoring and mitigation in place, it is anticipated to result in neutral effects to the overall water quality and water resources. South West Water have not provided sufficient information in its plan to demonstrate it could achieve neutral effects.	The potential for effects on the River Stour are mentioned in the HRA (SEA Environmental Report Annex H), but within the context of the river's hydrological connectivity to Habitats Sites. The River Stour itself is not a Habitats Site and therefore this comment will be incorporated within related assessments, where applicable. Any adverse effects on the River Stour need to be confirmed through additional assessments and will be reflected in future iterations of the Environmental Report.
Chapter 13 is consisted of a number of reports and is in excess of 1500 pages long. Due to the way the document has been formed, the page numbers in the contents page are incorrect and due to the length of the document it is exceptionally difficult to find the information needed. Additionally, as part of its WRMP submission in January, South West Water provided an updated SEA Chapter. When the plan was published in February, the SEA document appears to be a different version. As an example, the February version does not contain all the L1 and L2 screening summary tables.	A partially updated version of the SEA Environmental Report (Revision E) was provided to EA in January 2023. the Environmental Report was then updated and finalised, and the revised version was published in February 2023 for consultation (Revision F). Both reports were the current version at the time of submission - this can be seen from ER Revision Record and dates at the start of the report. The correct version was published for consultation. The contents page had not been updated in the 'work-in-progress' version of the SEA Environmental Report provided in January 2023, and this was updated for the published consultation version (Revision F).
In the company's WRMP, there are a number of occasions where the company refer to other sections of its plan. However, on some occasions the references appear to have broken and these are now showing as referencing errors. These errors are in Chapter 10, Section 1.3.2 and there are around 44 in Chapter 13.	A partially updated version of the SEA Environmental Report (Revision E) was provided to the EA in January 2023. the Environmental Report was then updated and finalised, and the revised version was published in February 2023 for consultation (Revision F). The 'work-in-progress' report, provided in January 2023, was not fully complete and the referencing was therefore not updated at that point. This was subsequently updated in the February 2023 consultation version of the report.

ID Reference: 050	**Historic England**
Feedback	**South West Water Response**
Site options and selection, heritage impact assessment 3.1 In drawing up and selecting specific schemes, water companies should be seeking not just to minimise harm to the significance of heritage assets and their settings, but to make a positive contribution to the historic environment where opportunities exist. In this regard, in relation to nationally significant infrastructure the NPS (paragraph 4.8.9) suggests considering measures to enhance the significance of heritage assets, and to address heritage assets that are at risk, amongst other things.	As part of the SEA, the WRMP options have been assessed against SEA Objective 6 (Historic Environment) "Conserve, protect and enhance the historic environment, including archaeology", which positively scores options which meet assessment questions including "Will the option enhance the significance of heritage assets including their settings?" (Table 7.2 of the SEA Environmental Report). See also the detailed SEA assessment matrices in Annex 6 of the Environmental Report, which contains recommendations for potential opportunities to enhance significance of heritage assets.

3.2 In order to achieve this, individual schemes should take opportunities to avoid adverse impacts on heritage assets through careful siting of new infrastructure and transfer pipelines. Enhancements to heritage assets, and improvements to public access and understanding, may also be achieved through conservation/restoration of existing water related infrastructure such as historic canals. In this way heritage has the potential to attract positive scores within the best value framework.	The assessment of potential positive impacts on the historic environment associated with the WRMP is captured within the SEA Framework (Objective 6 - Table 7.2 of the SEA Environmental Report). The SEA team have liaised closely with the option engineering teams to refine pipeline routes for options. See also detailed assessment matrices in SEA Environmental Report Annex 6, which contains recommendations for potential opportunities to enhance significance of heritage assets.
3.3 At this stage, the assessment of historic environment impacts and benefits associated with specific options (whether in the SEA, or Gate papers associated with Strategic Resource Options) is generally high level/broad brush and therefore both inconclusive and difficult for Historic England to validate. In determining which options should be taken forward into final plans, we therefore urge South West Water to give fuller consideration to the potential for heritage impacts and enhancements.	The SEA is a strategic assessment therefore, due to the early stage of option development, the SEA option assessments are based on publicly available heritage data. Baseline site surveys and associated data are not available at this stage. Project-level detailed site assessments would take place in future, when option detailed design is taken forward. This would be in conjunction with engagement with Historic England and other key stakeholders.
3.4 With this in mind, South West Water should be aware that paragraph 2.5.7 of the NPS states that: 'Any option included in a final water resources management plan will need to consider feasibility and reliability as well as taking account of potential environmental and social impacts'. We believe that more needs to be done by South West Water to meet this requirement in relation to the historic environment. By doing so, the water company can help to ensure that preferred options are deliverable and will not encounter unexpected obstacles during later consenting processes.	The WRMP options have been assessed against SEA Objective 6 (Historic Environment) "Conserve, protect and enhance the historic environment, including archaeology", based on the level of detail available for the options at this strategic stage. Options will be developed further in future and will undergo more detailed project-level studies. SWW are undertaking modelling utilising the outputs from the SEA to ensure all environmental and social sustainability objectives are taken into consideration during selection of the preferred options, including SEA Objective 6 (Historic Environment).
3.5 We note that South West Water has committed to further engineering and environmental studies to inform the final plan, and we hope that this will include robust consideration of heritage. Historic England has produced guidance on The Historic Environment and Site Allocations in Local Plans, which sets out a suggested approach to site selection that takes account of the historic environment. In appropriate cases, we request that heritage impact assessment of specific proposals is carried out, following industry guidance such as that produced by Historic England. In doing so, in order to take account of unrecorded and non-designated archaeology, the relevant Historic Environment Record should be referred to, and the views of local authority archaeological advisers sought. Heritage impact assessment should also follow a recognised approach to the assessment of setting and views, such as Historic England's GPA3: The Setting of Heritage Assets.	A summary of mitigation measures is outlined within Chapter 11 of the SEA Environmental Report and includes high level recommendations for additional assessments on the historic environment. Further mitigation for individual option assessments is provided in the detailed matrices within Annex 6 of the SEA Environmental Report. Additional baseline collection and assessment will be undertaken at a more detailed stage of option design. We will include reference to Historic England's guidance on The Historic Environment and Site Allocations in Local Plans. Additionally, where required, Heritage Impact Assessment will be identified as future recommendations and mitigation.
5 Response to specific project proposals 5.1 Historic England welcomes the commitment of South West Water to pursue a strategy of progressive leakage reduction and demand management alongside options for new or improved supply-side infrastructure, as part of best value planning. This recognises that supply-side projects will sometimes involve major infrastructure proposals with potentially major impacts on the environment including heritage.	We have provided information on all the schemes where there is certainty that they will be progressed. Further information will be provided for other schemes as these are developed and we have more certainty on what this will involve.

5.2 Within the dWRMP24, 13 preferred supply-side options are selected within the best value plan. An additional 8 options are identified that could be brought forward as part of a worst case / adaptive strategy. 5.3 Within the Plan itself, very little information is provided about the nature and location of these schemes. We note that in Appendix 8.1 there is some additional site-specific information. However, there remains considerable uncertainty for stakeholders on the location and nature of proposals. Consequently, it is difficult for Historic England to comment on specific proposals or to validate the findings of the SEA in relation to the heritage impacts of supply-side options.	
5.4 The same can be said for the Strategic Resource Options (SROs) which are being progressed by the West Country Water Resources Group. While we recognise that these are being progressed in parallel through the RAPID/Ofwat gated process, it is nevertheless important that there is accountability in relation to their selection for inclusion in Plans (which currently varies between the West Country water companies). As we have highlighted earlier in our response, paragraph 2.5.7 of the NPS states that 'Any option included in a final water resources management plan will need to consider feasibility and reliability as well as taking account of potential environmental and social impacts'. It is therefore important that options are transparent, are subject to a heritage impact assessment at the plan making stage, that proper consultation is carried out on these options, and that this informs the selection of sites to go forward to the final published plan. 5.5 Notwithstanding the present difficulty in understanding and assessing individual schemes, we wish to highlight a number of specific supply options (of those selected within the best value plan or adaptive strategy) with which we have early concerns about either the substantive impacts or lack of information on proposals. These should not be taken as exhaustive comments on the options. While comments draw on information in SEA Annex 6, they also should not be taken as reflecting our agreement with the assessment of impacts at this stage.	The next updates to the SEA Environmental Report (autumn 2023) will encompass strategic summaries for each of the SRO options captured under the WRMP24. Further consideration will be taken of the SROs during the cumulative assessment of preferred and alternative plans, using the most recently available SRO assessment information.
• COL2 Colliford Reservoir Storage Stage 2 - Lower River Camel Abstraction. A map showing the location of new infrastructure including pipeline is needed to better understand the impacts of this proposal. Within the SEA, the type and number of heritage impacts described seems inconsistent with the assessment of 'neutral' heritage impacts in both the short and long term. We are particularly concerned to note reference to direct encroachment on Lanhydrock Grade II* Registered Historic Park and Garden and [Battle of Lostwithiel?] Registered Battlefield. A more robust assessment of heritage impacts (including impacts on setting) will be required. It is also advisable that the water company contacts National Trust as a likely landowner to understand any potential implications of 'inalienable land'. We note that the potential for adverse effects on water dependant heritage assets or paleoenvironmental remains has	Comment noted - COL2 SEA assessment to be reviewed and updated where required. Landowner engagement is currently not anticipated to be undertaken at this stage due to the strategic nature of the plan, this will be considered during-further development of the options. Collection of additional baseline data will take place on a site-by-site basis when options have been developed further.

been identified and a commitment made to collection and assessment of additional baseline information.	
• COL11 Abstraction from Hawk's Tor Pit. The northern part of Hawk's Tor Pit falls within Hawkstor Pit SSSI – an important palynological site for interpreting Late Quaternary environmental history in upland south-west England. It is therefore of concern that the SEA has overlooked this feature, noting instead that 'Due to the option consisting of water transfer there is a very low potential of adverse effects upon groundwater dependent assets or paleoenvironmental remains'. Further information will be required to understand the potential impacts on this historic resource. If heritage assets are waterlogged, then changes in water levels or quality may impact on their preservation.	Comment noted - Hawk's Tor Pit SSSI has been assessed under Biodiversity objective 1.2 (see Annex 6). The SEA option assessment is to be updated to include this aspect within the Historic Environment Objective (6) in line with the comment. Due to the strategic nature of the SEAs, the collection of additional baseline data is not anticipated to take place at this time. Future recommendations for site surveys will be included, and undertaken during option development where required.
• WIM8 Bramford Speke is also an area of known paleoenvironmental interest1 and additional baseline data collection and assessment as recommended by the SEA would therefore be beneficial.	Comment noted - WIM8 SEA option assessment to be updated to address comment. Due to the strategic nature of the SEAs, the collection of additional baseline data is not anticipated to take place at this time. Future recommendations for site surveys will be included, and undertaken during option development where required.
• BNW7 Mendip Quarries SRO – including intake on the River Avon to recharge the quarry, and subsequent raw water transfer to the River Stour. The SEA Annex does not assess this proposal in detail, while the main SEA report suggests that 'In relation to historic environment and landscape, the creation of Mendips Reservoir is likely to improve the visual amenity and setting of the current landscape from the existing quarry'. We therefore wish to highlight that there is potential for significant heritage impacts associated with this proposal (including impacts of pipelines on archaeology), either within the Mendip Hills, River Avon catchment, Bath springs World Heritage Site or other areas. While we welcome an initial approach to Historic England for advice in relation to this SRO, more detailed site-specific information is required, particularly in relation to the routing of any pipelines.	Option BNW7 is an SRO which has therefore been through a separate assessment process to the WRMP24 supply and demand options. A high level summary of the SROs (BNW7) RAPID Gate 2 submission SEA findings will be included within the WRMP24 SEA Environmental Report update where available.
• BNW8 Poole Harbour SRO – final effluent reuse scheme. While the SEA Annex does not assess this site in detail, it should be noted that the Wessex Water dWRMP24 assessed this proposal as having significant negative effects, reporting construction related impacts on a large number of designated heritage assets. While we hope that mitigation measures (once specified and applied in detail) may go some way to resolving these issues, further information is needed on the location and nature of associated infrastructure. The Historic Environment Record shows significant archaeological potential in the Poole area including a Roman Road extending between Poole and Wimborne Minster, and Roman pottery workings close to Poole Bay. We therefore support the recommendations within the SRO Gate 2 submission that full Heritage desk-based assessment, geophysical surveys at areas of archaeological potential along the pipeline route, evaluation trenching and geophysical survey are carried out within the activities leading to Gate 3 (commencing early 2023).	Option BNW8 is an SRO which has therefore been through a separate assessment process to the WRMP24 supply and demand options. A high level summary of the SROs (BNW8) RAPID Gate 2 submission SEA findings will be included within the WRMP24 SEA Environmental Report update where available.

• BNW11 Christchurch WWTW IPR 2 - Transfer to Longham Lakes. Further information is needed about this proposal and its potential impacts. The SEA heritage assessment gives mixed messages, making an overall assessment of moderate negative impacts during construction only, but referring to a large number of potential impacts within the SEA Annex. It is not entirely clear at present whether construction works would break new ground or would fall entirely within the footprint of existing infrastructure. Works in Christchurch have the potential to encounter archaeological remains due to considerable historic use and development in the area.	BNW11 is no longer included within the WRMP24.
• COL9 New reservoir at Leswidden Pool and transfer to Drift Reservoir. More information is needed on this proposal which is located partly within Cornwall and West Devon Mining Landscape World Heritage Site. World Heritage Sites are the highest level of heritage designation indicating international importance.	The SEA option matrices refers to Balleswidden Pool being located directly within the Cornwall and West Devon Mining Landscape World Heritage Site. Further review and consideration will be taken to highlight international importance and where required the COL9 assessment will be updated.
6 Strategic Environmental Assessment (SEA) 6.1 Historic England commented on the SEA Scoping report in 2022 and we note that changes have been made to the assessment approach and are set out in SEA Annex 1.F. Please note that where the early engagement of Consultation Bodies is referred to in section 4.2 of the main dWRMP24, the correct name for the organisation is 'Historic England'.	The updates to the SEA Environmental Report will ensure the correct organisation name as stated will be used throughout.
6.3 We are pleased to note explicit reference in both the South West Water dWRMP and the SEA (8.7) to the findings of the SEA being used to inform decision making around options and the best-value plan. While we remain of the view that the historic environment should be incorporated explicitly into plan objectives and metrics, this nevertheless suggests that there is some linkage and accountability between the assessment of impacts – including heritage impacts – and the overarching plan-making process. Paragraph 10.6.2 of the SEA refers to the way in which the SEA has informed options, stating that infrastructure locations, pipeline routes and intake locations have been amended 'thus avoiding sensitive areas and reducing the need for mitigation'. However, as a number of preferred options are nonetheless assessed by the SEA (Annex 6) as 'directly encroaching' on heritage assets, itmis unclear whether these impacts are now considered unavoidable or whether infrastructure/pipeline routes are subject to further adjustment?	Infrastructure and pipeline routes are subject to further adjustment as options are in the early stages of development where there is current scope for refinement. Further baseline data via site specific investigations/assessments will further inform the development of the options, to minimise likely adverse impacts such as those regarding the historic environment. The SEA is strategic and where there is mitigation to avoid direct impacts on historic assets for example, this has been taken into account to inform the post-mitigation residual effects reported in the Environmental Report (SEA assessment criteria outlined in detail within Environmental Report Annex 1, Appendix E).
6.4 We also welcome the inclusion of the historic environment within the SEA objectives (Table 7.1) and guide questions (Table 7.2). 6.5 In relation to the assessment of the heritage impacts of specific proposals (Chapter 9 onwards), this is both high level and selective. This is helpfully expanded on, to some extent, by the more detailed content in Annex 6. This reveals a somewhat variable approach to the assessment of heritage impacts for different sites/proposals. It is not clear to what extent the approach has been informed by an understanding of the significance of the heritage assets affected – a key	Section 8.4.7 of the SEA Environmental report outlines the following: "*Professional judgement, following the SEA framework, is used to determine the significance of effects identified. A narrative explaining the significance of effects accompanies the score. In the case that further negative effects are identified, additional mitigation measures have been investigated, or alternative options explored in further detail in order to minimise any affects associated with the WRMP24*." The SEA assessment criteria outlined in detail within the SEA Environmental Report Annex 1, Appendix E,

concept in heritage policy and decision making. For further guidance please refer to Historic England's GPA2: Managing Significance in Decision Taking.	provides the high-level assessment strategy in relation to the significance of heritage assets and potential associated risk.
6.6 The assessment approach appears to rely on buffer zones as the main way of identifying potentially impacted heritage assets. While this is understandable bearing in mind the large number of proposals being assessed, it is important that assessors are aware that buffers will not provide an appropriate means of assessing impacts on the settings of heritage assets, where in some circumstances a view can be impacted over a considerable distance. This requires a more nuanced and contextual approach. Further guidance can be found in Historic England's GPA3: The Setting of Heritage Assets. 6.7 Next, while it is common for development impacts to be identified as relating to 'construction' or to 'operation', in the former case it must be recognised that heritage impacts relating to construction cannot always be treated as temporary/short term. For example, the direct physical impact (or 'direct encroachment' as referred to in this SEA) of a pipeline on buried archaeology during construction is likely to be permanent and irreversible. In the case of setting impacts resulting from construction activities, while it may be more common for these to be temporary, certain impacts such as the loss of mature trees to allow for installation of a pipeline, may also result in setting impacts that persist for some decades. We advise that the SEA assessment of options/proposals should be revised to reflect this distinction. 6.8 This is particularly relevant in relation to lengthy pipeline transfers which are likely to encounter Scheduled Monuments and other archaeological remains. It is important that South West Water is aware that any works that would pass through scheduled areas would, under the 1979 Ancient Monuments and Archaeological Areas Act, require Scheduled Monument Consent and there is no guarantee DCMS would grant this. Water companies should seek to route any pipelines or other infrastructure outside of Scheduled Monument boundaries; typically we would recommend that a reasonable buffer is allowed, subject to the results of further archaeological investigation.	The assessment of effects are not solely distance based, however distance thresholds were used as starting points. Effects have been determined based on the level of detail available at this stage. Further studies and engagement with Historic England will take place as options develop further. The SEA assessments will be reviewed to ensure the commentary appropriately draws out the long-term effects of construction activity. Gaining consent for the proposed options and other planning activities related to ensuring the protection of historic assets will be initiated where required when site, construction and operation details have been further progressed.
6.9 A related point is that, within the assessment of heritage impacts, limited consideration has been given to unknown and non-designated heritage assets. Where non-designated archaeology is found that is of equivalent significance to a Scheduled Monument, both NPPF footnote 68 and paragraph 4.8.5 of the NPS provide the same level of policy protection to that archaeology as to a designated heritage asset. The likelihood of archaeological finds may be greater within the settings of known heritage assets (such as Lostwithiel Battlefield) and in monument rich landscapes such as Bodmin Moor. 6.10 The assessment of long term / operational impacts on the historic environment as a result of changes to the water environment, water quality and chemistry (in particular the impact of increased or reduced abstractions) is also largely absent from the SEA at present. Consequently, while there are some references to potential impacts on water dependent heritage assets or paleoenvironmental remains,	The potential for encountering previously unknown archaeology and the impacts on water dependent heritage assets was included in the SEA assessments. The assessment commentary will be reviewed to clarify this. The assessments will also be further expanded to address the likelihood of previously unknown archaeological finds within the types of locations noted. Where applicable, the Historic England guidance on the Tiered Assessment approach will be included with future recommended further studies and mitigation.

these are generally recorded as 'neutral' due to lack of information. Within Annex 6, for a number of schemes it is stated that additional work will be undertaken in relation to water dependent heritage assets and water sensitive historic environments. Where relevant, Historic England guidance recommends a Tiered Assessment approach which can be found in Preserving Archaeological Remains: Appendix 3 Water Environment Assessment Techniques (2016). This forms an appendix to Historic England's advice note on Preserving Archaeological Remains.	
6.11 In relation to mitigation, we welcome the fact that the SEA gives some attention to this on a site by site basis. However, the approach is fairly high level/general (e.g. 'implement best practice mitigation measures'). This leaves a high level of uncertainty about what mitigation is required and whether this can be delivered. We would therefore welcome further information on mitigation measures where relevant, having regard to Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004, which indicates that Environmental Reports should include: '7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme'. 6.12 We support the commitment within section 11.2 to monitoring of proposals. However, we are concerned that the monitoring measure 'number of heritage assets adversely affected' does not present a meaningful measure that would trigger specific positive action. The measure fails to distinguish between either the level of significance of an asset, or the severity of the impact on it and would therefore benefit from refinement. 6.13 Regarding the assessment of impacts of specific schemes – please refer to our comments in section 5 of this response. For many of the proposals, we consider that further information is needed on the nature of the infrastructure proposed, and its location/footprint, including the routing of pipelines and extent of construction corridors. We recommend that heritage impact assessments are carried out for relevant proposals in advance of publication of the final WRMP, including for all SROs. These may both be informed by, and inform, the SEA. Where there are potential impacts on assets that fall within the statutory remit of Historic England, we would welcome further engagement to ensure that harm to the historic environment is minimised or mitigated, and that where possible opportunities are taken to secure enhancements.	The SEA is a strategic assessment of options identified within the WRMP24, utilising the information available at the time of writing. Further detailed design and site surveys are anticipated to be undertaken at a later stage. A summary of mitigation measures is outlined within Chapter 11 of the SEA Environmental Report and includes high level recommendations for additional assessments on the historic environment. Further mitigation for individual option assessments is provided in the detailed matrices within Annex 6 of the SEA Environmental Report. More tailored mitigation measures will become available when option designs are finalised and further assessments/studies are undertaken. The monitoring suggestion regarding historic asset numbers will be reviewed and further developed within the next iteration of the SEA Environmental Report. The undertaking of site specific studies such as heritage impact assessments will take place at a later stage where this information becomes available. Future engagement with Historic England will seek to develop these options further in line with their requirements.
Finally, we wish to request several minor adjustments to specific statements within the SEA report: • Within the executive summary, and repeated elsewhere in the SEA report including 5.2.7 and the future baseline, there is a reference to the fact that Somerset is the only county within the South West Water region which does not have a heritage asset identified as being 'at risk'. As the reason for this appears to primarily relate to the fact that only a small part of Somerset is located within the plan area (rather than that there is	The updates to the SEA Environmental Report will ensure that the proportion of Somerset within the SWW region is clarified. It is noted that the extent of the SWW region is captured within Annex 1 Appendix D.

no heritage at risk in Somerset), we do feel this might be a misleading statement. We therefore suggest that it is either removed or qualified.	
Please note a typographic error on p27 where 'Historic Environment' has been written instead of 'Historic England'. • Within Table 6.1 (p42 Historic Environment) we believe that the following sentence may be an error? 'Explore opportunities to enhance the significance of heritage assets and their setting, for example through habitat creation'. • Please note that Table 9.3 of the SEA is not easily legible. • Within section 11.1 Mitigation and Enhancement Measures there is a statement that where heritage assets are impacted 'options should be placed as far away as possible from the asset'. However, the level impact on an assets setting does not relate to distance alone as infrastructure may be far away but impact on a key designed view (for example). We therefore suggest alternative text as follows 'should be placed to minimise direct impacts and impacts on setting'. • Also within section 11.1, we welcome the next statement which commits to consultation with statutory bodies, but suggests that the text is extended slightly to say 'according to statutory requirements, policies and guidance'.	The updates to the SEA Environmental Report will ensure that these suggestions are captured.
7 Proposals for the Isles of Scilly 7.1 Chapter 14 of the dWRMP24 contains information on the context, supply demand balance and proposed best value plan for the Isles of Scilly. The area is described as 'seriously water stressed' with the intension to address this at least in part by delivering marine desalination in the immediate future (AMP7: 2020-25), and our understanding is that these proposals are therefore not being consulted on as part of the dWRMP24? Instead the dWRMP will deliver a continuation of existing metering, leakage and water efficiency strategies. 7.2 This strategy seems to be based on the assumption that a number of schemes to intake and treat groundwater, brackish or sea water will be delivered by 2025. These include proposals for the islands of St Mary's, Bryer, Tresco, St Martins and St Agnes that are listed in Table 1 of Chapter 14. 7.3 We recommend that early consideration is given to whether any of these would trigger the statutory requirement to consult Historic England at application stage. If this is the case then we recommend that South West Water gives consideration to whether it would be beneficial to seek preapplication advice from Historic England. We note that option ISMY1 records a positive effect on the historic environment in Table 9.3 and further information about the nature of this effect/enhancement would be helpful.	The Isles of Scilly options have subsequently been removed from the WRMP24.
8 Pipeline transfers not included in the dWRMP24 9.1 Appendix 8.2 (Interconnector Options) outlines a number of options for new and enhanced pipeline networks, which do not appear in the dWRMP by merit of their not directly resulting in an increase in available water.	Pipeline transfer options are being developed and will be included and assessed within the next updates to the SEA Environmental Report. Future engagement with Historic England will seek to develop these options further in line with their requirements.

9.2 Like any major pipeline works, there is potential for these options to result in significant impacts on heritage assets, in particular known and unknown archaeological remains. We therefore recommend early engagement with Historic England on any schemes that are likely to result in impacts on heritage assets where this falls within our statutory remit.	

ID Reference: 067	**Natural England**
Feedback	**South West Water Response**
In our review of South West Water's dWRMP, Natural England has considered how the company has addressed its environmental obligations as set out in The Water Industry Strategic Environmental Requirements (WISER)2 and how the dWRMP supports the ambitions in Government's recently published Environmental Improvement Plan (previously the 25 Year Plan). Whilst we recognise the scale and complexity of the challenge in producing this dWRMP, Natural England are minded to object to South West Water's dWRMP if it is not improved in line with our representation before it is published. As submitted, we consider it will: have an adverse effect on the integrity of the River Avon and River Camel Special Areas of Conservation (SAC)	This comment has been acknowledged and conversations with NE are ongoing regarding the level of detail the HRA can provide at this stage and why potential effects on designated sites cannot be ruled out on a precautionary basis in some cases. Additional assessments such as on-site studies and hydrological modelling are required to fully confirm the extent of impacts and appropriate mitigation for some options.
Furthermore, Natural England consider that the dWRMP has insufficient information to determine impacts on Dartmoor SAC, Fal and Helford SAC, Isles of Scilly Complex SAC, Plymouth Sounds and Estuaries SAC, Tamar Estuaries Complex Special Protection Area (SPA), Isles of Scilly Marine Conservation Zones (MCZs), and Penwith Moors, River Barle, Lower Moors, Great Pool and Higher Moors & Porth Hellick Pool, Tamar-Tavy Estuaries Sites of Special Scientific Interest (SSSI). As submitted, the plan could have potential significant effects on these designated sites.	This comment has been acknowledged and conversations with NE are ongoing regarding the level of detail the HRA can provide at this stage and why potential effects on designated sites cannot be ruled out on a precautionary basis in some cases. Additional assessments such as on-site studies and hydrological modelling are required to fully confirm the extent of impacts and appropriate mitigation for some options.
We note discrepancies in option description, with detail differing between environmental reports. Additionally, impacts to marine features and Marine Conservation Zones (MCZs) do not appear to have been considered in environmental assessments.	Option descriptions between the Environmental Assessment reports will be made consistent for the next iteration of the draft WRMP. Marine Conservation Zones and Marine Protected Areas were considered within the SEA assessment, and are included in the SEA guide questions, as set out in Table 7.2 of the SEA Environmental Report.
Annex 1 - Natural England's advice on South West Water's draft Water Resources Management Plan (dWRMP) 2022 The legislative and policy context for Natural England's advice is set out in Annex 2 to this letter. Natural England has assessed how the plan has demonstrated compliance with these legislative and policy requirements,	The introductory commentary providing context to the NE representation on SWW's draft WRMP is gratefully received.

including, where Natural England is not a statutory regulator, our views on the level of ambition shown in the plan and the timescales proposed in relation to nature recovery and resilience. The dWRMP has also been reviewed in relation to the Environmental Destination set out within it, and whether that scenario is sufficient to meet these legislative and policy requirements. In particular, where the Plan relies only upon the Environment Agency's minimum requirement of "Business as Usual plus" (BAU+), Water Companies should ensure that their WRMP includes a pathway to meet all their environmental assessment and nature recovery obligations in line with duties and timetables in Annex 2.	
1.1 Habitats Regulations Assessment (HRA) Water Companies have a statutory duty to prepare Water Resource Management Plans (WRMPs) and are the Competent Authority for Habitats Regulations Assessment (HRA) of the draft WRMP. Natural England has reviewed the HRA submitted with this dWRMP alongside other parts of the draft WRMP, and wishes to provide the following advice: In Natural England's view, South West Water's draft Water Resources Management Plan (dWRMP) should be amended to meet the Company's obligations in so far as they are relevant to the supply - demand balance set out in the dWRMP. Natural England are minded to object to the South West Water dWRMP if it is not improved in line with our representation before it is published. As submitted, we consider it will have an adverse effect on the integrity of the River Avon SAC and River Camel SAC	This comment has been acknowledged and conversations with NE are ongoing regarding the level of detail the HRA can provide at this stage and why potential effects on designated sites cannot be ruled out on a precautionary basis in some cases. Additional assessments such as on-site studies and hydrological modelling are required to fully confirm the extent of impacts and appropriate mitigation for some options. Further work is ongoing and will continue at a project-level to fully determine environmental effects on designated sites.
The amendments should include: • An assessment of the effect of the increase in demand for abstraction that is likely to arise from growth, including new development.	It has been acknowledged that the effect of the increase in demand for abstraction should be assessed, however this information is not readily available at present. SWW will undertake further assessment/monitoring as options progress.
• An assessment of the existing adverse effects on the River Avon SAC and River Camel SAC caused by abstraction under current licences, and the role which these may play in preventing the site from achieving its conservation objectives for flow and physical river habitat (which support the riverine SAC habitat and fish species). To be clear the assessment should address flow requirements for meeting the River Avon and River Camel Conservation Objectives5 and include consideration of available abstraction on naturalised flows that are dramatic (i.e. significantly greater than the deviations allowed for by the conservation objectives for flow) and the impact of available abstraction on meeting the site's conservation objectives in periods of environmental drought/low flow (<Q95) conditions6. The assessment should cover the whole length of the river SAC relevant to impacts from abstraction (not only the WFD lower waterbodies as considered in the draft WRMP). It should also cover the effect of abstraction in conjunction with physical modification and management intervention required on the	This information is not currently readily available at this stage of option development. SWW will undertake further assessment at the project level and engage with NE as options are further developed. This requirement will be included within further assessment/monitoring sections of the SEA Environmental Report to acknowledge the requirement for a project-level HRA for certain options.

river channel to enable that abstraction, notably in relation to meeting the site's conservation objectives concerning the structure, functioning, and supporting processes for the interest features.	
• An explanation of how an increase in abstraction from the River Avon SAC and River Camel SAC will be prevented, clearly identifying the mechanisms and options to secure this, so that it can be relied upon with certainty.	An increase in the abstraction from the River Avon SAC and River Camel SAC would not be prevented if certain options are progressed. Other measures along the watercourse would be required, which would require further study than the HRA can provide with the current level of detail at this stage.
An explanation of the measures that will be put in place to compensate for continued volumes of abstraction from the River Avon SAC and River Camel SAC to the planning horizon for the WRMP if, after mitigation, adverse effects remain and there are no alternatives to this abstraction that would remove the impact on the integrity of the site. Compensation will be required if the alternatives can only remove the adverse effect over very long, possibly multidecadal, timescales.	If adverse effects remain after mitigation at HRA Stage 2, further measures would need to be put in place to ensure the integrity of the site is not compromised. These detailed measures cannot be provided at the plan level and would require further assessment and engagement with NE as options are developed.
1.1.2 Formatting Comments Natural England notes the production of the informal HRA of the dWRMP. We have some comments relating the readability and formatting of the document that we hope will aid in the production of the final, formal HRA.	All comments relating to formatting have been noted and will be addressed in the next iteration.
We welcome section 2.2, which briefly summarises each option, and makes for a useful crib sheet when referring to the plan/HRA. We do however find that the sole use of the code for each option (ROA14) without the accompanying option name (ROA14 – Raise Avon Dam) makes it difficult to remember which code refers to which option. We recommend that both the code and option name is referred to throughout the document, including in the contents page of the HRA, to make navigating the report easier.	It has been acknowledged that using option codes rather than the full description may make it difficult to interpret which option is being referenced. Appropriate names will be included within the next iteration of the SEA Environmental Report and associated appendices to enhance readability.
We also advise that the HRA, and indeed the other assessment reports appended to Chapter 13, are separated into distinct, standalone documents. It is difficult to navigate through each document when they're presented as one file – for example the page numbers relate to the individual reports and not the appendix as a whole.	We acknowledge that the SEA Environmental Report Annexes may be difficult to navigate and will seek to publish the next iteration of the Environmental Report and associated assessments in the most accessible way.
Maps should be provided within the HRA, demonstrating the location of the assessed options in relation to Protected Sites. These maps should be clear and easy to interpret, therefore we recommend confining these to individual options, or at largest, WRZ scale.	Appendix D provides the baseline of ecological sites in the SWW region. Detail of the relevant sites in screened into the HRA assessment is provided within Annex 1, Appendix H - HRA Assessment. Maps can be provided in the next iteration of the HRA.
1.1.3 Formal Assessment and In-Combination The development of the dWRMP should have an appropriate formal statutory HRA that demonstrates how the plan complies with the legislative requirements for environmental assessment set out in Annex 2 to this report. The HRA clearly outlines itself as an informal document, crucially stating that "…none of the options currently have enough associated information to conduct an appropriate Stage 1 screening…"	The formal plan-level HRA will be the final report in Autumn 2023. HRA screening and Appropriate Assessment has been carried out for all options, which have been undertaken to the extent that currently available information allows. At this stage, there may still be insufficient information at a project-level for each option, where further assessment such as on-site studies or hydrological modelling is required to confirm the extent of effects. On a precautionary basis, the potential for adverse effects remains

(HRA, Statement 3.3.2) Though we recognise that the dWRMP identifies the informality of the HRA in Chapter 4 this is not compliant with the WRMP guidance and legislative obligations as set out in Annex 2.	noted in the HRA as these cannot be conclusively ruled out for some options at this stage. The requirement for future monitoring/assessments to fully confirm adverse effects, with associated updates of the HRA and engagement with NE, will be detailed in the SEA Environmental Report.
The HRA attempts to carry out an in-combination assessment for the 11 Preferred Plan options identified in Table 2-1. Chapter 4.3.2 of the dWRMP states that "The HRA concluded that there will be no in-combination effects on Habitats Sites as a result of this plan". Whilst this chapter does then go on to say this is indicative only, we advise that there is not sufficient information provided to inform this decision. The HRA notes that an in-combination assessment has not been carried out for Least-Cost or Worst-Case plans (HRA, pg19). Natural England advises that all options should undergo an in combination assessment, particularly where these options make up the Adaptive Strategy and have a likelihood of being deployed.	SWW will provide a full in-combination assessment in the revised version of the HRA in Autumn 2023.
The HRA states that the indicative in-combination assessments that have been carried out for the Preferred Plan options only consider "possible interactions between preferred plan options and do[es] not account for other operational schemes or submitted planning applications within the respective WRZs" (HRA Pg 20) For clarity, Natural England advises that a full, cumulative and in-combination assessment should include an assessment of the impacts from any option and should include existing licenses where these are material to the assessment of likely significant effect.	SWW will provide a full in-combination assessment in the revised version of the HRA in Autumn 2023.
A 'down the line' approach has been taken by South West Water to assessing a number of options, including in-combination assessments. The criteria for which we consider this approach to be acceptable is outlined in Annex 2. Natural England does not consider these criteria have been fulfilled and recommend South West Water undertake a plan level full assessment of all options included in the preferred plan, including a comprehensive in-combination assessment, to illustrate that the planned approach will not have an adverse impact on integrity of any Habitat Sites. A commitment should be made in the final plan to pursue alternatives if an adverse effect on integrity of a Habitat site cannot be avoided for the preferred options within the plan.	SWW will provide a full in-combination assessment in the revised version of the HRA in Autumn 2023. Where the potential for adverse effects cannot be currently ruled out in the HRA on a precautionary basis, these options will continue to undergo further assessment to fully understand the potential effects alongside engagement with NE.
Natural England supports the statement outlining the need for further assessments in SEA section 9.9.6, "Upon receipt of more detailed data, a revised HRA Stage 1 Screening is required, with progression to subsequent HRA stages if necessary.", but these should be undertaken before the plan can be published. If adverse effects cannot be excluded on objective evidence options in the plan may need to be altered.	The HRA screening and AA has been updated as options have been developed to inform the revised draft plan. The statement "Upon receipt of more detailed data, a revised HRA Stage 1 Screening is required, with progression to subsequent HRA stages if necessary" has subsequently been removed from the revised HRA report, and any options where adverse effects cannot be excluded will be identified with the necessary approach.
1.1.4 Existing Licenses Natural England advises that South West Water should ensure that the HRA of the dWRMP includes existing licences where a material change has occurred since the last	This information is not currently readily available at this stage of the assessment. SWW will undertake further assessment/monitoring at the project level as options are further developed, alongside ongoing engagement with NE. This requirement will be included

HRA of that licence or/and the last dWRMP in line with the WRMP guidance and requirements set out in Annex 2 to this letter. The material change can include changes to the climate (e.g. drought impact), guidance, policy, legislation, conservation objectives or SACOs (Supplementary Advice to Conservation Objectives) or evidence of site deterioration/condition change or anything that is material to the determination of either likely significant effect or adverse effect on integrity. This includes cumulative effects and in combination effects.	within further assessment/monitoring sections of the SEA Environmental Report to acknowledge the requirement for updated project-level HRA for certain options.
1.1.5 Best Practice Measures It is noted that 'Best Practice Measures' make up a considerable amount of the proposed mitigation strategies for those options that have undergone Appropriate Assessment (AA). Please see government guidance on appropriate assessments. They should be specific to the impacts of the development, and they should be made in the light of the site conservation objectives (See Annex 2, 2.1). The measures that mitigate the adverse effect should be certain and specific to the impacts which they are mitigating. It is unclear from the use of the none-specific term "best practice measures" how mitigation will meet the tests of certainty required in an appropriate assessment to avoid an adverse effect on integrity of the designated sites.	Updates to the reports in summer 2023 will expand upon 'best practice' mitigation measures during construction and provide more specific details where necessary.
1.1.6 Monitoring South West Water have not outlined any monitoring in their HRA, aside from the potential for otter camera traps. Natural England advise South West Water to produce a full monitoring plan for the environmental impacts of their dWRMP in line with legislative commitments (see Annex 2 in particular SEA requirements). The monitoring programme needs to be robust and adaptive in relation to their assets and operations which could impact upon Protected Sites. This should be completed before the final WRMP is published.	It has been acknowledged that further detail on monitoring is required within the HRA. Monitoring/further assessment sections are being updated for the next revision of the HRA in Autumn 2023. This will be specific to qualifying features of Habitats Sites, rather than a full monitoring programme.
1.1.7 Potential Additional Options It is anticipated that there are several additional options which may be included in the final WRMP that were not identified at the time of drafting, including the proposed Cornwall desalination options noted in Chapter 8 Annex C. We advise that the final HRA should include their assessment. Note that desalination can impact marine protected areas including those covered by the Habitats Regulations.	The final SEA Environmental Report and associated appendices will include all options which are proposed for the WRMP. At the time of response, all Isles of Scilly desalination options have been removed. It is acknowledged that if they are reinstated, or new options arise, marine elements will be considered.
1.1.8 Dartmoor Special Area of Conservation (SAC) The HRA notes Dartmoor SAC in the informal assessment for the following options: ROA2 River Erme ROA3 River Yealm ROA7 Expansion of Northcombe WTW to 60Ml/d ROA8 Tottiford WTW – Reduce WTW minimum capacity	Any additional information on ROA4 and ROA15 provided in Spring 2023 has be used to update the HRA. Additional monitoring and assessment will be included where uncertainty remains. The additional impact pathways are being included in the updated (Autumn 2023) version of the report.

ROA10 Avon WTW – Reduce WTW minimum capacity ROA11 Meldon WTW – Reduce WTW minimum capacity ROA14 Raise Avon Dam ROA16 Littlehempton WTW We advise that impacts to Dartmoor SAC should be considered in the updated assessments of the following options: ROA4 Abstraction of Roadford compensation flow at Gunnislake when making supply releases ROA15 Gatherley phase 2	
Please find below our comments relating to options with the potential to impact Dartmoor SAC, where we feel further assessment is required. 1.1.8a ROA14 – Raise Avon Dam This option seeks to raise the level of Avon Dam by 2-4m (figures differ between environmental reports and summaries), increasing the size of the reservoir by 50m from the current reservoir edge. This option is not included as part of the Preferred or Adaptive plans; our following comments highlight deficiencies in the HRA process in relation to this option. The SEA of this option highlights the potential for both short and long term 'Major Negative Impacts' to biodiversity, flora and fauna due to potential for colonisation of invasive non-native species (INNS). The WFD Assessment demonstrated that further assessment would be necessary due to impacts from sedimentation and nutrient loading. Despite noting the potential for impact to Dartmoor SAC from pollution during construction, and the spread of INNS during operation, these long-term threats have not been recognised by the HRA process and therefore we cannot agree with the conclusion of the AA that there will be no adverse impacts as a result of the option. We understand that the HRA was completed in advance of the WFD/SEA reports, however the 'Introduction of invasive species', 'Nutrient enrichment' and 'Changes in sedimentation/silting' are all specified within the HRA criteria as a potential effect on Habitats sStes, therefore should have been considered. The option proposes to raise the water level of the reservoir, taking "an approximate area of 50m around the current footprint." (HRA, pg149), bringing Dartmoor SAC within less than 500m of the asset. As noted in the SEA, this action may increase the spread of INNS within and upstream of the waterbody. We do not consider that at this stage best practise methods relating to INNS management are enough to secure a conclusion of no adverse effect. Furthermore, the HRA notes that due to the approximate 50m loss of area around the waterbody, the option "may result in the loss of terrestrial habitats which are suitable for otter resting places, such as priority grass moorland. This could have a significant effect of the SAC population and supporting habitat outside the site boundary." Additionally, in reference to Otter, the HRA also notes that "Effects of displacement may be temporary or long-lasting and may result in redistribution within or from a site."	Any additional information on ROA14 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where uncertainty remains. The additional impact pathways are being included in the updated (Autumn 2023) version of the report, to account for the findings of the WFD/INNS assessments, and provide consistency with the HRA. Operational impacts due to the loss of functionally linked habitats (otters) and the spread of INNS will be included accordingly.

We do not therefore agree with the assertion of the AA that there will be no operational impacts to Otter.	
1.1.8b ROA10 – Avon WTW – Reduce WTW minimum capacity. This option seeks to upgrade Avon WTW to allow for finer control of supply during times of lower demand and is included within the Adaptive Strategy. Whilst we welcome the upgrade to allow the WTW to run at a lower output, therefore conserving water resources, we disagree with the assertion within the screening that "The Bala Brook may support Atlantic salmon. However, as this watercourse and its headwaters are outside of the SAC boundary, it is unlikely that populations of Atlantic salmon here, if present, are those associated with the SAC." (HRA Section 31) Our mapping demonstrates that the Bala Brook extends into the Dartmoor SAC boundary by approximately 500m. We recommend removing the reference to the Brook being outside of the SAC boundary.	Any additional information on ROA10 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains. Text referring to the Bala Brook and its connection to the Dartmoor SAC will be amended following the comment, and additional impact pathways considered. At the time of the original assessment, no information regarding the relationship between the WTW and the upstream reservoir was available. Additional description, where available, will be included to inform the assessment.
Natural England advise that it is not clear from the HRA what the effects of refining the capacity of the WTW will be. Whilst we understand that the infrastructure changes will be confined to the existing footprint of the WTW, what is not clear is what effect reducing the amount of water treated will have on the upstream reservoir. Will this result in increased water being stored within the reservoir? As with ROA14, will this then have the capacity to increase INNS risk and damage/destroy otter habitat? Whilst this may not be relevant, the lack of detail within the option description makes this difficult to determine, therefore Natural England are minded to object to the proposal on the grounds that insufficient information is available to determine impacts to Dartmoor SAC.	Any additional information on ROA10 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains. Text referring to the Bala Brook and its connection to the Dartmoor SAC will be amended following the comment, and additional impact pathways considered. At the time of the original assessment, no information regarding the relationship between the WTW and the upstream reservoir was available. Additional description, where available, will be included to inform the assessment.
1.1.8d ROA4 – Abstraction of Roadford compensation flow at Gunnislake when making supply releases. We agree with the conclusion of the HRA and AA for this option, in so far as it concerns Plymouth Sound and Estuaries SAC. There is insufficient evidence at this stage to conclude no adverse effect on integrity, however due to insufficient detail of the proposed scheme this option should be reassessed before the final WRMP, and not at this stage progressed to Stage 3.	Any additional information on ROA4 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains. Additional sites will be included within the revised assessment (Autumn 2023) where required. The in-combination assessment will be included within the final report in Autumn 2023; cumulative effects from changes to Gunnislake and other abstractions in the catchment will be included in the final version.
We do however advise as above that Dartmoor SAC should be screened into the HRA for this option, and that the report should be mindful of future potential changes to the asset at Gunnislake which may impact the efficacy of the option.	As above.
We also query whether this abstraction will be an increase to the existing license on the Tamar, and whether this has been assessed alongside the proposed abstraction(s) further upstream (River Lyd and/or River Tamar)	As above.

Whilst we appreciate that the HRA/AA does not conclude there will be no adverse effects on integrity at this stage, instead advising the assessment is completed at a later stage with further information, Natural England advise the conclusion of this assessment is that an adverse effect on integrity has not been ruled out. The company should either drop the scheme or go through the further tests of the Habitats Regulations, including assessment of alternatives. Please refer to Annex 2 where the legislative tests are set out for ease of reference.	The following response covers the comments from NE which relate to COL2 - River Camel Abstraction. Any additional information on COL2 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains, and adverse effects on the integrity of the site have not been ruled out. It is acknowledged that subsequent stages of the HRA process are likely to be required. The background information on the River Camel SAC will be incorporated into the summer 2023 updates to provide a more comprehensive overview of the potential adverse effects on the SAC from this option, specifically with reference to the existing condition, nutrient neutrality and the potential for further reduced flows as a result of abstraction. Ongoing discussion following the comments and report updates in summer 2023 will highlight the issues with this proposed option, and aid the decision to either remove it from the WRMP or commit to appropriate monitoring to inform the HRA. SWW will also update the SEA assessment to clarify whether the abstraction is planned to be within the existing licence.
The River Camel SAC already faces significant threats from both low flow and water quality issues, which could be exacerbated by further abstraction. Crucially, the River Camel is a nutrient neutrality site, something not noted within the HRA/AA. There is insufficient consideration therefore of how reduced flows will impact the nutrient concentration of the river. Including an option, particularly within the Preferred Plan, in which a new abstraction has the potential to exacerbate the potential adverse effects without mitigation to remove the adverse effect increase is not compliant with the tests in the legislation. Moreover, options to supply growth should not cause, add to an existing or make it more difficult to remove any adverse effect on a European Site	As above.
Natural England additionally questions the decision to increase abstraction in a SAC river designated for Atlantic Salmon, as a method to achieve a more naturalised flow for Salmon in a heavily modified water body (St Neot stream GB108048007640). This option should not only be considered in light of the Habitats Regulations tests but also in the light of the Environmental Improvement Plan targets.	As above.
The SEA suggests that this new abstraction would be an increase of 15Ml/d from the River Camel. It is unclear whether this abstraction is planned to be within the existing license. Where abstractions are increased within existing licences, they should be fully assessed to understand the impact of this increase, and the original HRA for the licence should also be made available for review.	As above.

WCRP Annexe A notes that “significant reductions in abstraction from the River Camel SAC are also being considered.” Natural England highlight the need for South West Water to explain in greater detail their wider plan for the Camel catchment, so it can be understood how this new abstraction fits into their supply demand balance, the overall Environmental Destination of the WRMP and meets their Environmental obligations for nature recovery as set out in Annex 2.	As above.
Natural England note that no detail has been provided in the dWRMP regarding the size or scale of the proposed weir associated with this option. We advise however that we would consider a new weir of any size to have a likely negative impact on the designated site, with the potential to lead to further deterioration of the overall condition SSSI and further undermine the achievement of the conservation objectives of the SAC. The River Camel SSSI/SAC condition status is classed as Unfavourable No Change due to pressures from abstraction. There are existing remedies to remove structure and reduce abstraction in this SAC river, therefore Natural England would be minded to object to options which prevent recovery of the site to its conservation objectives.	As above.
1.1.9c COL12 – Stannon daily abstraction increase This option seeks to increase the daily abstraction from Stannon lake by 4Ml/d for 3 months of the year. This site was subject to a drought permit in 2022. Not part of the Preferred or Adaptive plans, this option nevertheless appears to be planned for delivery in 2023. We agree with the opinion of the AA, which advises with the information available at this stage, that there is a likelihood of adverse effects on the integrity of the River Camel SAC as a result of increased abstraction within Stannon. The results of monitoring and modelling undertaken as part of the recent drought permit (determined 11/11/2022) should be interrogated to inform the formal HRA. The potential for downstream flow reduction as a result of this increased abstraction should be considered in the formal HRA, particularly where this may impact mobile SAC species (Otter, Bullhead, Atlantic Salmon)	Any additional information on COL12 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains. The drought permit information will be sought for future versions of the report, and any subsequent project-level updated HRA for this option.
1.1.9d COL20 – River Fal New Abstraction Although not included within the Preferred Plan, this option proposes a new abstraction and treatment works on the River Fal. We note that this proposed new abstraction will be within the Fal and Helford SAC at Ruan Lanihorne. This location presents an important transition from saltmarsh through to carr and to oak dominated woodlands, and it is one of few sites in Europe, and least disturbed, where this integration occurs. Freshwater flows can be especially important for saltmarshes during drought, where they are at higher risk from water and salinity stresses. Although the exact location for the abstraction is unknown, the Table 20-2 of the AA determines that “No adverse impacts are identified during operation.”. It is the advice of Natural England	Additional information on COL20 was provided in Spring 2023, and where relevant has been used to update the potential effects from the construction and operation of the new abstraction, particularly concerning flows. Any remaining uncertainty of adverse effects will be highlighted within the revised report and further assessments/monitoring recommended. The cumulative effects of abstraction in the catchment will be included in the revised version of the report (Autumn 2023).

that further evidence is needed to determine that there will be no operational effects as a result of this new abstraction.	
Furthermore, we advise that where a new abstraction is proposed its impacts should be assessed in combination with existing abstractions within the catchment. As noted above, where abstractions are increased within existing licences, they should be fully assessed to understand the impact of this increase, and the original HRA for the licence should also be made available for review in line with the WRMP guidance.	As above.
1.1.10 Wimbleball WRZ Supply Options 1.1.10a WIM7 - Increase Pynes to licence limit 66.46 Ml/d. This option seeks to abstract the full 66.46Ml/l licensed flow at Pynes WTW through asset upgrades. This option is in the Preferred Plan. Natural England again advise that where abstractions are increased within existing licences, they should be fully assessed to understand the impact of this increase, and the original HRA for the licence should also be made available for review.	Additional information was provided in Spring 2023, and where relevant has been used to update the potential effects from the licence increase. Any remaining uncertainty of adverse effects will be highlighted within the revised report (Autumn 2023) and further assessments/monitoring recommended.
1.1.10b WIM8 - Brampford Speke Borehole & WIM9 - Stoke Canon Borehole Both WIM8 and WIM9 options seek to bring existing borehole assets at Brampford Speke and Stoke Canon online, discharging flows into the River Exe for abstraction further downstream – potentially at Pynes WTW (subject of Preferred Plan option WIM7). Both are included within the dWRMP Preferred Plan. Exe Estuary SPA and Exe Estuary Ramsar have included within the HRA, however Natural England do not agree that this assessment is robust enough to determine no Likely Significant Effect. Natural England are aware that an AMP7 investigation directly concerning options WIM8 & WIM9 is in the final stages of review. We expect any findings to feed into the final environmental assessment for and delivery plan of the WRMP. Additionally, we are aware that a wider Exe WFD No Deterioration investigation has been included within WINEP24 for delivery by 2027, the outcomes of which should inform the decision to engage these assets.	Additional information on these options was provided in Spring 2023. This has been used to update the HRA and take a precautionary approach to identifying effects on the designated sites. If information on the AMP7 and WINEP investigations is available, this will be used to inform the revised assessment (Autumn 2023).
1.2 Strategic Environmental Assessment (SEA) WRMPs are prepared for water management and set the framework for future development consents of projects listed in Annex II of the EIA Directive, including groundwater abstractions and impoundments. As such, WRMPs meet the requirements set out in the SEA Regulations requiring SEA to be completed. Natural England's advice on the documents submitted as part of the SEA for this dWRMP are as follows: South West Water note that the SEA scoping consultation ran from 6th May – 9th June 2022. Natural England have no record of being consulted at this time, and therefore we were not able to make a meaningful contribution to the SEA process at scoping stage.	The Scoping Report was sent directly to Natural England by SWW via email on 06/05/22, with an invitation to participate in the consultation and information on how to respond.

We understand from Chapter 13 (8.4.9) that given the lack of specificity and timeframes associated with the options, that this SEA presents a high-level assessment of the proposals. This is particularly so for in-combination or cumulative assessments. We take this opportunity to again advise that Natural England are minded to object to the South West Water dWRMP if it is not improved in line with our representation before it is published.	Further studies will be ongoing in the future with clear plans and commitments by SWW to undertake these. This will be made clearer in the next update of the SEA Environmental Report.
• Natural England is unclear what screening distances have been used in the detailed assessment of the SEA. The SEA has been informed by the "informal" HRA, INNS Report, WFD Assessment, Natural Capital Assessment (NCA) and a Biodiversity Net Gain (BNG) Assessment. The HRA outlines the impact zone to be a maximum of 10km from the proposed option (HRA pg15) however the NCA determines a more precautionary zone of influence to be "the area of receiving (i.e., a watercourse receiving a discharge) or providing (i.e., an aquifer where abstraction will occur) environment with the potential to be altered or changed because of the options." (NCA, pg7) Natural England requires more clarity as to whether the correct designated sites have been identified for each option, and at what distance the potential effects of options have been considered.	Initially within the SEA assessments, designated sites had a buffer of approximately 5km to enable the high-level assessment of the options. The SEA then drew on HRA findings, which utilised a buffer of up to 10km. Impacts are not solely distance based, therefore these distance thresholds were used as starting points. Biodiversity sites were reviewed beyond this initial threshold to identify additional sites which may be connected to or affected by the options.
Additionally, we advise that for the Biodiversity, Flora and Fauna objective the SEA should not rely solely on results of the HRA to determine impacts to designated sites, as interest features and boundaries can differ between SSSI and European Sites and for desalination sites the boundaries of Marine Conservation Zones are often different (MCZ).	The Biodiversity, Flora and Fauna SEA topic Objective 1.1 does not rely solely on HRA input but also proximities to SSSIs and the location of the options in relation to SSSI IRZs, and also proximities to MCZs relative to their boundaries. The assessments are undertaken using the Atlas GIS tool which allows these different receptors to identified via their associated shapefiles.
The SEA should include assessment of how the plan complies with the duties to restore nature including protected sites as set out in Annex 2.	The BNG and NCA assessments assess the potential of each option for habitat protection and restoration. Additionally, the potential opportunities for the options to enhance NC and BNG were considered following the NCA and BNG assessments, utilising the data and results to inform on the most appropriate potential opportunities for enhancement of the options and wider benefits.
• The potential adverse effects of alternative and preferred plan options have been discussed. The positive, negative, and neutral impacts of each option in the Least-Cost Plan and Worst Case Plan have been scored as well as each option in the Preferred Plan to compare the adverse impacts on each objective. However, the explanation of scoring against objectives often lacks detail. Specifically, in many cases the explanation of impacts on specific sites, habitats and species are not included, or where they are, the source-receptor pathway	The scoring methodology aligns with the SEA matrices. Scoring criteria is provided within Annex 1 - Appendix E of the SEA Environmental Report. Please note there will be a revised Preferred Plan and alternative options within the revised draft WRMP24. We will seek to expand the commentary on these topics.

is not explored. South West Water should consider including further commentary on the specific impacts	
• It is the opinion of Natural England that for many options presented within SEA Summary (Chapter 8, Appendix 1), the mitigation proposals are not robust or site specific enough to mitigate the impacts that have been identified, and not all impacts have been identified. Additionally, the mitigation options largely concern impacts from construction, and do not consider any legacy or operational impacts.	Chapter 8, Appendix 1 only serves to provide a summary of impact mitigations identified by the assessment, as stated within the 'Document purpose and summary' section. Further mitigation is set out in detail within the SEA assessment matrices within Annex 6 of the SEA Environmental Report, which detail potential mitigation measures for both construction and operational impacts.
• South West Water have not included a detailed monitoring plan which goes beyond general suggestions (Chapter 13, Section 11) A timetabled plan designed to remove evidence gaps during this plan period should be included. This should initially target options which will be developed before 2040.	A detailed monitoring plan is currently in progress and will be included within the next round of updates for the SEA.
• Chapter 13 (10.6.9) advises that further modelling work is being conducted to inform the outcome of the SEA. Natural England anticipates that this will impact on the development of options for the Preferred, Least-Cost and Worst-Case plans. We look forward to the proposed revisions to the SEA which aim to add more detail to the anticipated operational and construction impacts.	Comment noted for upcoming updates to the SEA Environmental Report.
• The mapping provided in Annex D does not deliver sufficient level of detail to determine whether all relevant designated sites have been screened into the assessment. As noted in the HRA, the provision of maps for each option, or at least at WRZ level should be provided to aid future consultation.	Appendix D provides the baseline of ecological sites in the SWW region. Detail of the relevant sites in screened into the HRA assessment is provided within Annex 1, Appendix H - HRA Assessment.
Environmental Destination and SEA: Natural England is concerned that the Environmental Destination set out in the plan is not sufficiently robust to ensure compliance with SEA requirements. Where the companies dWRMP is relying on the Regional Plan SEA and the Environmental Destination within the plan to meet its environmental obligations it should still satisfy itself that the companies environmental obligations set out in Annex 2 are met. This includes making sure that non-European SSSI rivers and wetland SSSI and priority wetland habitats have been included in the Regional Plan Environmental Destination modelling. Species obligations and newer obligations from the Environmental Improvement Plan (EiP) should also be included within the Environmental Destination. If they are not, then the company should do additional work to include assessment of these impacts in their WRMPs.	Incorporation of Annex 2 and related studies can be found within Section 4 of the draft SEA Environmental Report; Appendix B of the draft SEA Environmental Report (Review of Relevant Policies and Programmes); and HRA (Appendix H of the draft SEA Environmental Report). Modelling related to the SEA and associated studies will be updated in line with future updates to the WRMP24 as required. SWW will seek to ensure that species and newer obligations are to be included within the Environmental Destination where required.

1.2.1 SSSIs in the SEA Natural England acknowledges that SSSIs have been included in the SEA objectives as assessment questions and sub-themes within 'Biodiversity', however would encourage South West Water to assess SSSIs in a clearly identifiable, separate section of the SEA; this would enable potential impacts on SSSI features to be assessed.	SSSIs are specifically included within SEA Objective 1.1 and the effects on these sites are described in the detailed SEA matrices (Annex 6, Appendices L-Q of the SEA Environmental Report).
Furthermore, where protected sites have been assessed against an option, these should be noted to demonstrate consideration of all relevant sites. When assessing impact, designated features, condition, and threats should be considered. This will enable South West Water to understand their resilience to any potential impacts of reduced water levels through abstraction or drought, for example.	The baseline environmental review (Annex 1: Appendix C of the draft SEA Environmental Report) forms an evidence base against which environmental issues or opportunities resulting from the WRMP24 can be assessed, which feeds into the SEA assessment. Designated sites in close proximity to options are detailed in the SEA matrices (Annex 6, Appendices L-Q of the SEA Environmental Report). Additionally, cumulative effects on protected sites are outlined within Chapter 10.5 of the SEA Environmental Report.
1.2.1a COL2 - Colliford PS Stage 2 – River Camel Abstraction Chapter 13 (4.3.6) notes that an AMP7 investigation is currently being scoped to understand the effects of abstraction in the Camel catchment, aiming to recognise how current licenses impact the ability of waterbodies to achieve their European Sites Conservation Objectives or Favourable Condition for Sites of SSSIs. We expect the outcomes of this investigation to inform the environmental assessment and ultimate destination of option COL2.	Relevant options assessments to be amended upon receipt of AMP7 investigation findings.
Chapter 13 outlines the potential for moderate long-term negative effects as a result of this option for objectives 1.1, 1.2, 2.1 and 5.1 of the scoring matrix; objectives directly relating to designated sites, biodiversity, water resources and carbon emissions. This scoring explains that increased abstraction at this location has the potential to promote water level changes, affect ground water levels, impact wider hydrological connections, result in reduced flows and risk pollution incidents. The stage 2 WFD Assessment for COL2 notes that "the proposed abstraction (90Ml/d) is large in comparison to mean flow and a reduction in flow downstream of the abstraction may significantly affect the hydrological regime and conditions for biology" (WFD, pg37), scoring the option as presenting a 'significant risk of deterioration'. The deterioration of a WFD water body is also likely to result in an adverse effect on integrity of an overlapping European Site7. Potential deterioration of an SAC is not a moderate effect and this SEA criteria should be amended to reflect the major impact on the designated sites. Natural England advises that the level of resilience that a Protected Site has to withstand potential impacts from reduced water levels through abstraction or drought, is considered within the environmental assessment.	SEA assessment will be reviewed and updated accordingly.
Natural England do not agree that the mitigation noted in Chapter 8 presents a sufficient strategy to mitigate the negative long-term operational effects projected as a result of this option – particularly where they are not yet known.	The specific detail regarding mitigation is outlined within Chapter 11 of the SEA Environmental Report and also Annex 6 of the report (Appendices L-Q). Further information will be provided where possible in the revised SEA Environmental Report.

1.2.1b COL9 – Leswidden Pool Although not listed as part of the preferred plan, we note that this option supports the Colliford Adaptive Strategy and as such has the potential to be an option brought forward for deployment. This option seeks to transfer raw water from the new reservoir Leswidden Pool to the existing asset Drift Reservoir. It is not clear whether option COL9 Leswidden Pool has been assessed for impacts to Penwith Moors SSSI – the site does not appear to be included on Annex D Figure D1.	It has been acknowledged that an update to the COL9 SEA is required to include assessment of the potential impacts to the Penwith Moors SSSI. Would this also need to be mentioned in the HRA? It has also been acknowledged that the granularity of Appendix D Figure D1 is not clear, and will be improved for the next iteration of the SEA Environmental Report.
At 3,152 ha Penwith Moors is one of the largest expanses of semi-natural habitat in the South West and includes one of the largest areas of lowland heathland habitat in Britain (around 1,200 ha). It also supports wetlands, areas of unimproved grassland and a diversity of species including plants, lichens, invertebrates, and a breeding population of Dartford warbler. It was notified on 7 October 2022 and as such should be included within the SEA.	No options are in close proximity to this SSSI or have been identified to have LSEs. However, Penwith Moors will be included within the environmental baseline in the SEA Environmental Report (Chapter 5) in the next revision of the report.
1.2.1c COL11 – Hawk's Tor Pit COL11 is part of the dWRMP Preferred Plan and Chapter 11 Table 2 notes that South West Water are currently looking to implement this abstraction permanently in 2023. This option is within close proximity to both Hawkstor Pit SSSI and Bodmin Moor North SSSI. We are unclear as to whether these sites have both screened into this assessment due to lack of this detail within the SEA.	Hawk's Tor Pit SSSI and Bodmin Moor North SSSI were both included in the COL11 SEA. Both sites were specifically mentioned in the detailed SEA assessment matrix for COL11, see SEA Environmental Report Appendix M.
Natural England are aware that the Warleggan River, which at the time of Hawkstor Pit SSSI's notification ran parallel to the east of the pit, has, by natural processes, resumed its original course and now flows into the north of the pit. Unit 2 of Bodmin Moor North SSSI borders the proposed abstraction site and is in Unfavourable Recovering condition. This unit is designated in part for its acidic fen, wet heath, blanket bog, and valley bog. Any permanent abstraction at this location should demonstrate consideration of the potential impacts to the surrounding and SSSI features, as well as the potential for any hydrological connectivity to the Bodmin Moor North SSSI.	Comment noted for the ongoing updates to the SEA Environmental Report and associated assessments.
1.2.1d ROA15 Gatherley Phase 2 As noted in section 1.1.8c of this letter, Natural England is not satisfied that a thorough enough assessment has been carried out in respect of this option to determine no LSE. As the SEA has been informed by this assessment, we therefore do not have confidence that the scoring of this option against the objectives reflect the true impact of the proposals.	The Plymouth Sound & Estuaries SAC and Tamar Estuaries Complex SPA are noted to be hydrologically connected to the option, but ROA15 is located sufficient distance away to not cause LSEs. The SEA is not only informed by the HRA to draw conclusions on the biodiversity SEA topic, and also reviews potential impacts on SSSIs, Nature Reserves, and other designated and non-designated sites (see SEA Environmental Report Annex 6, Appendix N for further details).
Furthermore, Natural England advise that the potential for downstream impacts to marine features from changes to freshwater inputs should be properly assessed. This option lies upstream of Plymouth Sounds and Estuaries SAC, Tamar Estuaries Complex	Regarding downstream impacts to marine features, the SEA Environmental Report and relevant assessments will be reviewed to ensure this is appropriately reflected. Tamar-Tavy Estuary SSSI is screened into the assessment as various options are identified as

SPA and Tamar-Tavy Estuaries SSSI, all of which support and host marine features. It is not clear if Tamar-Tavy Estuaries SSSI has been screened into this assessment.	having the potential for effects on this site, e.g. ROA4 (see SEA Environmental Report Annex 6, Appendix N for further detail on the SEA assessments).
1.2.1e WIM8 - Brampford Speke Borehole & WIM9 - Stoke Canon Borehole It is not clear whether Brampford Speke SSSI, Exe Estuary SSSI and the River Barle SSSIs have been considered as part of the SEA. The River Barle SSSI is located in the headwaters of the River Exe catchment and is designated for Atlantic Salmon – the SEA should consider impacts to upstream migration, including an assessment of impacts should the downstream flow from Wimbleball Reservoir be reduced when the boreholes are operational.	These sites were indirectly referenced in the SEA matrix for these options as 'ecological SSSIs hydrologically connected to the option through groundwater' (see SEA Environmental Report Annex 6, Appendix O), however we will clarify this in the updated SEA Environmental Report.
As above, Natural England are aware that an AMP7 investigation directly concerning options WIM8 & WIM9 is in the final stages of review. We expect any findings to feed into the final environmental assessment for and delivery plan of the WRMP. again, we are aware that a wider Exe WFD No Deterioration investigation has been included within WINEP24 for delivery by 2027, the outcomes of which should inform the decision to engage these assets.	SWW have confirmed they are assessing this further via hydro-ecological modelling work (see Chapter 4.3 within the SEA Environmental Report). Further updates to the SEA Environmental Report will include findings from the AMP7 WINEP investigations where available.
1.2.1f Isles of Scilly (IoS) Boreholes (ISMY1, ISMY2 & IST1) The SEA assesses a number of undefined supply side options on the Isles of Scilly, three of which concern the drilling of new boreholes at undisclosed locations on St Mary's and Tresco Islands. It is unclear which designated sites have been screened into these assessments due to the lack of detail within the SEA report and the resolution of the accompanying map in Appendix D.	The final SEA Environmental Report and associated appendices will include all options which are proposed for the WRMP. At the time of response, all Isles of Scilly options have been removed. It is acknowledged that if they are reinstated, or new options arise, full detailed environmental assessments would be required, and would need to be included in the reporting.
Natural England note that a condition applied to the existing abstraction licenses issued to South West Water in 2021 stipulated comprehensive monitoring of Lower Moors SSSI and Higher Moors & Porth Hellick Pool SSSI on St Mary's, and Great Pool SSSI on Tresco. Both St Mary's SSSI's are currently in Unfavourable Declining condition, in part due to impacts from drying due to water abstraction. Before further groundwater abstraction plans are finalised, Natural England advise that a Water Level Management Plan be developed by South West Water, which should inform the decision to develop these options further. Natural England are therefore minded to object to these options, until South West Water can demonstrate that no further harm will occur to the SSSIs as a result of these options.	The final SEA Environmental Report and associated appendices will include all options which are proposed for the WRMP. At the time of response, all Isles of Scilly options have been removed. It is acknowledged that if they are reinstated, or new options arise, full detailed environmental assessments would be required, and would need to be included in the reporting.
1.2.2 Protected landscapes in the SEA Natural England appreciates that protected landscapes have been identified and scoped into the SEA and note that assessment determines that negative effects are largely neutral or minor. We note however that the assessment is very high-level and it is not possible for Natural England to fully assess the adequacy of the generic	The SEA process is high level, strategic and iterative - more detail will be provided as process continues. Site assessments and detailed site-specific mitigation will take place once options are progressed further.

mitigation options presented in the context of specific cases, particularly where new above ground infrastructure is proposed.	
1.2.3 Biodiversity in the SEA Natural England welcomes the consideration given to the NERC duty (as strengthened by the Environment Act 2021) and recognises the ambition of South West Water at early feasibility stage to restore and enhance habitat. We are pleased to note that South West Water has conducted Natural Capital and Biodiversity Net Gain assessments to support the SEA and look forward to the development of these as options are more definitely outlined.	SWW welcomes the comment that NE are pleased to note that SWW has conducted Natural Capital and Biodiversity Net Gain assessments to support the SEA.
The assessments consider priority habitats and species, however at such an indefinite stage in option development it is unclear whether all the potential impacts have been identified and therefore whether any proposed mitigation or monitoring is sufficient, or whether any potential net gain will be realised.	The assessment findings reflect the level of detail available at this stage of option development. It is agreed that further project-level assessment and mitigation is required as options develop, and this will be undertaken as designs progress. The current environmental assessments have assessed the likely impacts and potential mitigation measures, however these will be detailed further in consultation with NE as options develop.
Natural England notes that Appendix J identifies Option COL2 to likely result in the permanent loss of ancient woodland, an irreplaceable habitat. We advise that in terms of the Biodiversity Net Gain Metric 3.1, although classed as an irreplaceable habitat, ancient woodland is not a discrete habitat type and, as such, is not listed in the metric (BNG User Guide, 3.5.10.) Care should be taken to record the habitat fully when surveying, and where loss of irreplaceable habitat is proposed, bespoke compensation needs to be agreed on a case-by-case basis with the determining body or planning authority, and the options should meet the strict planning tests for the loss of such irreplaceable assets.	SWW welcomes the received advice and it is noted that irreplaceable assets will be assessed and accounted for in line with all relevant guidance and legislation, when required. Due to the early stage of option development, the current assessment is based on publicly available mapping data, and baseline site surveys and associated data are not available at this stage. Compensation will be determined in later stages, where applicable, in consultation with the relevant stakeholders.
1.2.4 Species Recovery and Protected species Natural England notes that there has been no assessment of the dWRMP, or current operations, on species abundance. Natural England Standing Advice for Protected Species is available on our website to help local planning authorities and others, including water companies, better understand the impact of their operations and development on protected or priority species should they be identified as an issue at developments or plans. This also sets out when, following receipt of survey information, the authority (or the undertaker in regards of the exercise of permitted development rights) should undertake further consultation with Natural England.	SEA is high-level and in-field surveys and associated data are not available at this stage to inform the assessments of the options. Assessment of species abundance can take place once options have been developed further, which will inform future decision-making alongside consultation with NE.
Natural England suggests that South West Water consider further assessment of the impacts of the dWRMP on species abundance and recovery, with measures put in place to halt any decline in species abundance in line with the 25-year Environment Plan targets, and in addition to the wider biodiversity targets that are required to be met by	Assessments and surveys at the site level will be undertake when options have been further developed. Species abundance and recovery will be part of these site level assessments to further refine likely effects on biodiversity and any additional mitigation required.

2042 in the Environment Act and 25 Year Environment Plan, now the Environmental Improvement Plan.	
We strongly recommend that South West Water commit to a robust monitoring plan which considers both present and future INNS management.	The monitoring plan is being updated for the revised draft WRMP (Autumn 2023).
In terms of this future outlook, we encourage South West Water to consider an adaptive approach to managing the spread of INNS. Climate change presents the risk that new INN species may be introduced, which if not anticipated could lead to inadvertent spread and colonisation.	The monitoring plan is being updated for the revised draft WRMP (Autumn 2023). We note the comment regarding climate change impacts on INNS risk, and will ensure this is considered in the update.
We encourage South West Water to consider their future INNS management across a range of climate change scenarios (2° and 4°) to proactively identify new and emerging risks. This is especially pertinent for those options noted above which include the inter-catchment transfer of water, particularly where water is to be first transferred to an open reservoir.	As above.
1.2.6 Marine Conservation Zones (MCZs) in the SEA. Natural England welcomes that MCZs are included within the Biodiversity topic, however advise that their assessment is made in a clearly identifiable separate section of the SEA. Furthermore, as highlighted in our SEA response to option ROA15, we advise that it is unclear whether freshwater inputs into estuaries, transitional habitats and saltmarshes have been considered.	The SEA assessment framework was consulted on in 2022 and no amendments were required. MCZs are specifically described in the commentary of SEA Objective 1.1, and likely significant effects are described within the detailed SEA matrices (Annex 6 - Appendices L-Q). Regarding specific assessment of freshwater inputs into estuaries, transitional habitats and saltmarshes, the SEA of options is high level and is restricted by the data available at the time of issue, and therefore specifics into impacts on these habitats may not be possible without further assessment/studies such as hydrological modelling. Future updates to the SEA report will seek to ensure these potential impacts are reflected in the commentary and any uncertainty is captured.
1.2.6a Desalination Natural England understands that further options may be presented within the final dWRMP concerning new locations for desalination in Cornwall, as well as expansion of existing desalination operations on the Isles of Scilly. We expect thorough assessment of designated sites in marine environments to inform the SEA for these future proposals.	At the time of response, all Isles of Scilly desalination options have been removed. It is acknowledged that if they are reinstated, or new options arise, marine elements will be considered.

ID Reference: 063	**Westcountry Rivers Trust**
Feedback	**South West Water Response**

ACTION 7 – Increase the level of river and fisheries monitoring and planning through Catchment Fisheries Plans to allow sufficient understanding of current aquatic species including fisheries assessments and actions that will increase habitats and species resilience. This needs to include a fish in distress monitoring scheme and fish rescue team that can work alongside the Environment Agency. It should also support low flow monitoring through the Citizen Science Investigation network.	SWW are keen to support the creation of Catchment Fisheries Plans and are committed to working in partnership with local delivery organisations, catchment partnerships and government agencies to meet our statutory duties in relation to eels, freshwater migratory fish, and maintaining healthy and resilient fish stocks. The recruitment of specialist fisheries expertise into SWW is evidence of this commitment.