

Statement of Response to the Public Consultation



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Summary

This report is our Statement of Response (SoR) to the public consultation on our Draft Water Resources Management Plan 2024 (dWRMP24), which was held for 12-weeks between 14 February and 09 May 2023. We thank all our customers and stakeholders for the constructive feedback they provided. This document shows how we have responded to their feedback.

During this consultation, customers and stakeholders had the opportunity to review our proposals for managing water resources supply and demand across our region, how this may affect them, and to give us their feedback and comments.

Throughout the development of our draft WRMP24 we have fostered close collaboration with customers, partners and regulators, and this has helped us to develop a full understanding of future water needs (challenges) and the potential options (solutions to the challenges) while building strong consensus on our plans and their delivery.

This Statement of Response document summarises the comments we received on the draft WRMP24 during the public consultation and provides an overview of how we have changed our dWRMP24 as a result.

A total of 79 responses were received to the consultation. A list of the respondents who provided representations on the dWRMP24 is provided. Responses are grouped into five segments: customers, statutory consultees, non-statutory organisations, business customers and water retailers, and consumer representatives.

Appendix 1 of this report sets out our responses to the individual issues and concerns raised by our consultees. Appendix 2 sets out our responses to each comment or piece of feedback related to the Strategic Environmental Assessment (SEA).

We remain fully committed to the co-production of our final WRMP with customers and stakeholders, and many of the conversations we have initiated are continuing as we produce our revised WRMP. We have already significantly changed our plans to reflect the ideas, different approaches and challenges we have received from them.

As a result of the investments accelerated in AMP7, the changes to the Water Resources Planning Guidelines in April 2023 and the feedback we received during the public consultation on our dWRMP24, we have made significant changes to our plan. In particular, we have updated our supply forecast, set out our Environmental Destination more clearly, improved our demand and supply strategies, increased the level of detail in our Strategic Environmental Assessment (SEA), and developed a more robust approach to the selection of our Best Value Plan. We are also working to ensure that our water resources management strategy, decision-making processes and the overall narrative in our dWRMP24 are clearly explained and justified.

Accordingly, in early October 2023, we will publish a further revised dWRMP24 which we will then publicly re-consult on in October and November. This will give our customers and stakeholders another chance to influence and shape our final WRMP24. Following the consultation on our revised dWRMP24 we will publish an updated Statement of Response which will include information on all the changes made in response to feedback received during the production of the plan.

In producing this SoR, we have complied with the Water Resources Planning Guidelines. We have also used external, independent assurers to give confidence to ourselves, our customers, and our regulators that we have complied with the guidance and that we have followed a clear, accurate and appropriate methodology. This assurance was undertaken by Jacobs during August 2023.

1 Introduction

This report is our Statement of Response (SoR) to the public consultation on our draft Water Resources Management Plan 2024 (dWRMP24).

All water companies in England and Wales must produce a WRMP and update it every five years. We last published a WRMP in June 2019. Working with stakeholders and listening to our customers, we reviewed and updated the 2019 WRMP during 2022, and then issued our dWRMP24 for public consultation between 14 February and 09 May 2023.

This document summarises the comments we received on the dWRMP24 and sets out how we have modified our plan as a result. The revised WRMP24 will be submitted to the Secretary of State for the Environment in early October 2023 and will then be subjected to another public consultation in October and November. Following the consultation on our revised dWRMP24 we will then publish an updated Statement of Response which will include information on all the changes made in response to feedback received during the production of the plan.

Having worked with Defra and our regulators to finalise the revised dWRMP24, we will publish the final WRMP24 in early 2024.

2 Background

Water Resource Management Plans (WRMPs) are produced as part of a statutory process under the Water Act 2003. This requires water companies to produce a WRMP every five years, setting out how the future demand for water from customers, businesses, stakeholders and the needs of the environment will be met. The legislation expects customers and stakeholders to inform the development of the WRMP by being involved in, and consulted on, each of stage of its development. The WRMP must also comply with the Water Resources Management Plan (England) Direction 2017, which came into force on 22nd April 2017.

In developing our dWRMP24, we have followed the revised 'Water resources planning guideline' (WRPG) issued jointly by the Environment Agency (our environmental regulator) and by Ofwat (the water industry economic regulator), which was last updated in April 2023.

Our dWRMP24 sets out how, with the active participation of our customers, business and water retailers, we propose to ensure that there is a sufficient water supply to meet future demand across our entire region over the 25-year planning period from 2025 to 2050.

The WRMP is a core business plan with strong links to our Drought Plan and our other ongoing operational activities. It describes in detail the technical assessments and actions we will undertake to ensure water will be available to meet the needs of our customers, businesses, visitors to the region and the environment over the 25-year planning period, and to determine the anticipated customer demand for water over this time to understand the future balance between supply and demand.

Our WRMP will inform our Business Plan for 2025–30. This will be submitted to Ofwat in October 2023 as part of its five yearly price review (PR) of water company charging, investment and service-provision to customers.

The current price review is referred to as PR24. Ofwat will decide, based on the evidence submitted with our PR24 Business Plan, how much we can charge our customers for our services for the next five years, confirming how much we can invest in securing and managing water supplies, reducing demand, preventing leakage and in developing new sources of supply whilst protecting the environment.

3 Developing our dWRMP with customers and stakeholders

We are committed to working with customers and stakeholders to develop an integrated and holistic approach to water management so that our WRMP delivers cross-sector, mutual benefits and outcomes for society and the environment.

Throughout the development of our dWRMP24 we have fostered close collaboration with customers, partners and regulators, and this has helped us to develop a full understanding of future water needs (challenges) and the potential options (solutions to the challenges) while building strong consensus on our plans and their delivery.

We have developed an approach to customer and stakeholder engagement that is broad (inclusive), robust and effective, and we have consistently applied it throughout the development of our dWRMP24.

Consultation and collaboration with our customers and stakeholders are a continuous process that ensures our water resource planning, overall business planning and long-term strategies are fully integrated with each other and are fully reflective of customer and stakeholder preferences.

3.1 How customer insight informed our draft WRMP24

Our 2020-25 Business Plan laid the foundations for comprehensive customer engagement to support the development of the dWRMP24. We carried out significant customer research during PR19 planning, engaging over 27,000 customers which included 1,072 business customers.

Building on this work, our research around water resources, water restrictions and water use has continued throughout 2022 and 2023, and a further 26,000 customers have now been engaged in relation to our future planning, including the dWRMP24.

This aimed of this engagement and research has been to gain a clear understanding of our customers' priorities for investment, the environmental issues they care most about, what they think about water efficiency measures and how much they are willing to pay for our services.

During these studies, which have spanned several years (2016-2022), we have employed different research methods, such as workshops, interviews, surveys and focus groups, including one study conducted during the COVID-19 pandemic to understand how that has shaped views.

The findings of this research have been brought together into an independent synthesis by Frontier Economics, which collated insights from around 40 separate studies. This synthesis has given us a clear customer viewpoint on priorities for investment and preferences for solutions. It has helped to identify gaps in our knowledge which we will aim to fill with future research.

Specific customer engagement undertaken to inform our dWRMP24 has included:

- 8 in-depth research or 'deep dive' studies involving several large-scale surveys and 28 focus groups.
- In-depth customer interviews (4) and bulletin board (14) to gather feedback on the dWRMP.
- Ongoing sentiment tracking research and ad-hoc deep dives into emerging topics.
- Our 'Green recovery' insight programme looking into how we could better support customers following the COVID pandemic.
- Focus Groups to get feedback on proposed supply and demand options for customers and businesses in the water stressed Bournemouth Water area.
- Research study into views of Water Retailers and Non-Household Customers (various issues).
- Two major Willingness-to-Pay studies exploring customer perceptions and priorities.

In addition, we have also worked alongside the West Country Water Resources Group (WCWRG) to deliver a major customer research study between June 2021 and March 2022, which focused on customer

awareness of drought resilience measures, the effectiveness of behaviour-change programmes, where we should set our environmental ambitions and the options for issues such as water transfers and reservoirs.

We learnt a huge amount about our customers' points of view through our extensive insight gathering including what our customers value about water, their perception of the challenges ahead, their priorities, and their expectations of our performance and services. This insight has informed, influenced and underpinned the development of all aspects of our dWRMP24, from option selection to levels of service.

3.2 Pre-consultation work with partners and stakeholders

To develop the dWRMP24, we worked closely with a wide range of stakeholders across our region, as well as with our expert colleagues within South West Water and our regulators. Throughout the development of the dWRMP24, the views, concerns, issues and preferences of stakeholders were captured, documented and have been carefully considered.

The insights gained have helped us to shape the strategic direction of our plan, refine our approach to water resources management planning, including the methodologies adopted, and improve the content of our dWRMP24.

The insights gained during this process will also be used to inform the development of subsequent customer and stakeholder engagement campaigns.

The early engagement undertaken with our regulators and stakeholders meant we were able to:

- Identify opportunities to benefit multiple water users and the environment.
- Reducing the risk of issues being identified later and resolve concerns early.
- Be transparent in methods, data, assumptions, and decisions.
- Engage at a local or catchment level and take a 'catchment approach'.
- Demonstrate that stakeholders' views have been considered (and acted on) in the development of the plan.
- Include evidence of customer and stakeholder support for our environmental objectives and plan to meet the ambitions of the 25-Year Environment Plan.
- Provide confidence to regulators and stakeholders that the Plan represents best value.
- Align with and complement other planning processes, including River Basin Management, flood risk management, drainage and wastewater management and drought plans.

To achieve these aims, we adopted a wide range of methods to connect with and engage our stakeholders, including correspondence campaigns, one-to-one meetings, focus groups, workshops, dissemination events, formal research and many additional formal and informal conversations which take place between our expert colleagues, partners and stakeholders on a regular basis.

During our pre-consultation stakeholder engagement work, we contacted over 400 stakeholders from across all 15 of our key sectors. Over 200 of these have become actively engaged in the process through attending events, completing surveys or by engaging in the dialogue via 1-2-1 meetings or working group meetings.

We also convened 12 stakeholder workshops, held two Stakeholder Forum events (~80 attendees at each), and established 4 regional working groups to discuss key regional water resources issues. The four groups were Agrifood, Water Efficiency, Fisheries and Rivers, and Nature Based Solutions.

We believe that our approach to developing our dWRMP24 has been transparent in its methods, data, assumptions and decisions, and it has been scrutinised and discussed with stakeholders throughout the process. We have worked hard to ensure that that stakeholders' views have been considered, and acted on, in the development of the plan.



stakeholder workshops



focus groups & workshops



regional working groups established

- Agrifood sector
- Water efficiency
- Fisheries & rivers
- Nature-based solutions

Customers	WRMP customer bulletin boards	Stakeholder forums	Meetings with regulators
<p>16,207* customers engaged including 1,072 non-household customers</p> <p>*now 26,000 in August 2023</p>	 <p>14 participants</p>	 <p>245 attendees</p> <hr/> <p>online: 450 invited, 100 attended</p>	<p>over 50 meetings</p> 

Throughout the stakeholder engagement activities, we adopted a ‘catchment approach’ and significantly increased our engagement and collaboration with the 7 catchment partnerships across our region. This allowed us to actively engage with customers and stakeholders at a local or catchment level and helped us to align our water-resources plans with other processes and planning regimes, including river basin management, flood risk management, drainage and wastewater management and drought plans.

The emerging proposals in the dWRMP24 were also discussed with, and scrutinised by, our stakeholders and regulators. We believe our ongoing pre-consultation engagement has helped ensure our plan represents best value for our customers and our decision-making processes, including the methods, data, modelling and assumptions used.

4 Public Consultation on the draft WRMP24

Having undertaken a comprehensive pre-consultation process, we wanted to ensure that our dWRMP24 reflected the issues, views and concerns our customers and stakeholders raised with us during its development. It is very important to us that it meets their requirements and expectations before we produce the final plan for submission to the Secretary of State for the Environment and our regulators.

To this end, we held a 12-week public consultation on our dWRMP24 between 14 February and 09 May 2023. During this consultation, customers and stakeholders had the opportunity to review our proposals for managing water resources supply and demand across our region, how this may affect them, and to give us their feedback and comments.

We received a total of 79 responses, via email, letter or the online survey provided. We value all the feedback we received and thank everyone that has taken the time to review the plan and provide comments.

We are fully committed to the co-production of our final WRMP with customers and stakeholders. Many of the conversations we initiated during the pre-consultation have continued throughout the formal consultation period and on into the production of our revised dWRMP24. We have already significantly changed our plans to reflect the ideas, different approaches and challenges we have received from them..

4.1 Promoting the public consultation

To promote responses to our consultation from our customers, retailers and stakeholders, we:

- Published our dWRMP24 and all supporting documents on our website in line with the requirements of the Water Resources Planning Guideline.
- Set-up an online feedback questionnaire in order to encourage direct feedback.
- Emailed key stakeholders (regulators, MPs, Local Authorities, etc) to notify them that the consultation had opened.
- Provided the dWRMP24 to our statutory consultees, the Environment Agency, Natural England, Historic England, Ofwat and Defra, arranged several 1-2-1 meetings and answered queries arising on specific issues.
- Included linked banners on the website directing people to the WRMP page to encourage people to get involved in the consultation.
- Issued a press release on 14 February 2023 publicising the consultation: <https://www.southwestwater.co.uk/about-us/latest-news/2023-news/south-west-water-launches-public-consultation-on-plans-to-secure-water-supplies-for-future-generations/> – this was published in both local and trade media and was designed to encourage our customers and stakeholders to engage with the consultation.
- Engaged on social media channels via Facebook, Twitter (over 13,000 followers) and LinkedIn throughout February, March and April 2023
- Circulated emails to over 450 stakeholders and partner organisations across 14 key sectors to promote the consultation and to encourage responses by email or via the online questionnaire – this was repeated several times to remind them of the closing date.
- Presented the dWRMP24 at two South West Water ‘Let’s Talk Water’ Online Stakeholder and Hybrid Stakeholder Forum to around 100 attendees at each.
- Held 2 public webinars to support the consultations on our dWRMP24 and WCWRG Regional Plan. The webinars were designed to promote the consultations, provide an opportunity for attendees to share their thoughts on our plans and to facilitate consultation responses.
- Arranged ~10 x 1-2-1 meetings to discuss the developing WRMP in more detail and to support the consultation with environmental Non-Governmental Organisations, local authorities, water retailers, agrifood business groups, catchment partnerships and other local organisations.
- Undertook a customer engagement ‘deep dive’ into the dWRMP24, including an online ‘bulletin board’ where 14 customers scrutinised the Plan in detail, and 4 x in-depth customer interviews where they were able to provide their feedback on the information presented in the WRMP.
- Provided updates to staff via internal communications channels throughout the consultation period, including a series of meetings with Operations and Asset Management staff from both South West Water and Bournemouth Water supply areas.

<p>Emails</p>	<p>Website</p>	<p>Internal communications</p>	<p>Press release</p>
<p>424,000 emails to customers</p> <hr/> <p>450 emails to stakeholders & local groups</p> 	<p>Published our draft WRMP24 and all supporting documents on our website</p> 	<p>Provided staff updates via internal communications channels throughout the consultation period</p>	<p>Issued a press release on 14 February 2023 publicising the consultation</p> 
<p>Meetings</p>	<p>Letters</p>	<p>Webinars</p>	<p>Social media</p>
<p>Provided 10 one-to-one meetings to discuss the plan with:</p> <ul style="list-style-type: none"> Local environmental groups City Councils Water retailers Agrifood business boards West Country Water Resources Group 	<p>Wrote to over 100 consultees, including:</p> <ul style="list-style-type: none"> Regulators Other water companies MPs and MEPs Members of the press 	<p>Held 2 WRMP consultation webinars</p> 	<p>Engaged on social media channels with over 13,000 followers on Twitter</p> 

In total, more than 200 stakeholders attended events where the dWRMP24 and the public consultation were promoted, with more than 10 taking up the opportunity for follow-up meetings to discuss it in more detail.

During the public consultation, visits to the website peaked at 440 views in the week of 24 April – 10 April, with several smaller peaks of around 140 visits in early March, just after the consultation opened, and just before it closed in early May. Overall, there were 2,395 visits to the consultation landing page and 1,412 unique page views.

4.2 Changes since the publication of the dWRMP24

Following the publication of our dWRMP24 for consultation in February 2023, there were several factors that meant that changes would have to be made to the dWRMP24. These included the ‘accelerated delivery’ of investments brought forward into the current Asset Management Plan (AMP) 7 investment period (2020 – 2025) that influence the baseline position for WRMP24, revisions made to the Water Resources Planning Guideline in April 2023 (during the consultation), and ongoing actions to manage the drought still impacting parts of our region.

As a result of these changes, we undertook a full review of the dWRMP24 and identified several areas where adjustments would be required to take these changes into account. All the adjustments that will be made to the dWRMP24 as a result of these changes have been captured in the change log, which will be included as an appendix to the revised dWRMP24.

AMP7 activities related to water resources management that have been ongoing since the publication of the dWRMP24 in January 2023 and which may therefore have a bearing on the revised dWRMP24, include the following:

4.2.1 AMP7 Supply Schemes, Accelerated Delivery & Green Recovery

Under the Ofwat Accelerated Delivery Scheme, South West Water will invest a potential £128 million to deliver four schemes, which includes the acceleration of 40,116 smart meters in the Colliford Water Resource Zone (WRZ) that will allow the company to achieve 1.2 Ml/d in water savings by monitoring near real-time flows to better manage demand and identify leaks quicker, and free customer leak replacements for customers which will provide longer lasting benefits.

Under the Green Recovery investment scheme, our proposal accelerates plans to address water supply risks affecting our Roadford Supply Area and advances our long-term water quality strategy for the North Devon area. The investment includes a new intake pumping station on the River Tamar to transfer raw water to Roadford reservoir, and new raw and treated water transfers between Prewley and Northcombe water treatment works (WTWs) providing a new strategic link between two key sources in the area. The proposals will help address the growing pressure on both water resource availability and quality and could support the transfer of water to areas in supply deficit across the region.

The 2022 drought has highlighted the importance of investing in a more diverse portfolio of water resources including climate independent and innovative sources (for example the use of quarries and desalination) to ensure that we are resilient into the long-term. In line with this, we are now planning to construct a modular desalination scheme at Par in Cornwall with infrastructure and the first treatment facility due for delivery and operational use in early 2024, and the second treatment module (increasing capacity) in late 2024.

The delivery of these activities and investments in 2022/23 have necessitated adjustments to the dWRMP24, principally due to their impact on the supply baseline and forecasting that the plan is based on.

4.2.2 Drought Management Actions

In 2022, SWW's supply area experienced a prolonged period of drought which resulted in the imposition of a temporary use ban for the first time in 26 years. The 2022 drought event was different from previous droughts experienced in the South West because the impacts began very early in the year, and it coincided with the hottest year on record.

To meet this challenge, we have identified several actions to help address the current supply demand deficits in Colliford and Roadford WRZs. Some of these actions, such as the new River Lyd Pumped Storage Scheme for Roadford, have already been delivered, while others will be completed over the coming months. The interventions we are progressing have been considered in an appraisal of all available options, and include leakage reduction, water efficiency, new sources, asset improvements and licence changes.

A key part of our response has been the implementation of an array of additional demand-management measures in 2022/23. These included offering household water audits, providing free water-saving and harvesting products, delivering the 'Stop the Drop' customer incentive campaign to minimise demand in Cornwall and launching the region-wide 'Save Every Drop' Communication Campaign. We have also introduced a Non-Household Innovation Fund to encourage our commercial customers to proactively think about how they can reduce their consumption.

As a result of this experience, we included a comprehensive 'Lessons Learnt from the 2022 Drought' section in our dWRMP24 and have integrated this learning throughout our revised plan.

4.3 Interaction of the dWRMP24 with other key plans

Our WRMP24 cannot be created in isolation, as it is just one of several key policies, strategies and plans that individually and collectively influence water supply security and quality for our customers and the environment. The WRMP24 will sit alongside our statutory **Drought Plan**, which drives our Drought and Resilience Programme, and it is also informing our **PR24 Business Plan** and **Long-Term Delivery Strategy (LTDS)**.

All the feedback received, and insights gathered during the dWRMP24 pre-consultation and public consultation has been used to inform the development of the SWW PR24 Business Plan and the accompanying Long Term Delivery Strategy.

Our dWRMP24 consultation has directly influenced the selection of schemes (particularly water resources investigations) to be included in the **PR24 Water Industry National Environment Programme (WINEP)**. Through the WINEP and Environmental Destination planning process we are working with the Environment Agency to identify the environmental impact of current SWW abstractions and identifying the best licensing strategy to ensure compliance with River Basin Management Plan (RBMP) objectives.

We recognise how important it is that our dWRMP24 is fully aligned with **West Country Water Resources Group (WCWRG) Regional Plan** which aims to make the best use of the available water resource within the West Country region. In line with this, throughout 2023, SWW has continued to be actively engaged in supporting the work of the WCWRG. During 2023, the West Country Regional Plan has continued to develop and has been enhanced following its public consultation which ran from 1 February to 26 April 2023. In addition, the plans for all three of the groups Strategic Resource Options (SRO) are moving through the RAPID gated process and have now received their Gate 2 approvals. We are expecting to have invested ~£15m in the development of these schemes by the end of AMP7, with ~£10m relating to the Cheddar and Mendip schemes specifically. Current forecast costs for AMP8 exceed £60m (and this could increase further if delivery of the Cheddar 2 scheme is accelerated in AMP8).

4.4 Recording, analysing and responding to consultation responses

We wanted to provide responses to all the feedback received during the consultation and to demonstrate in a comprehensive manner how this had genuinely influenced and helped us improve our dWRMP24. To achieve this, we designed a rigorous and transparent methodology to record, analyse, formulate responses and inform its revision.

Consultees were advised to submit their responses to both the Defra and SWW WRMP mailboxes, so they could be logged by both organisations and securely stored. All consultation responses received were allocated a unique identifier and the details of the consultee, date submitted, and method of submission recorded.

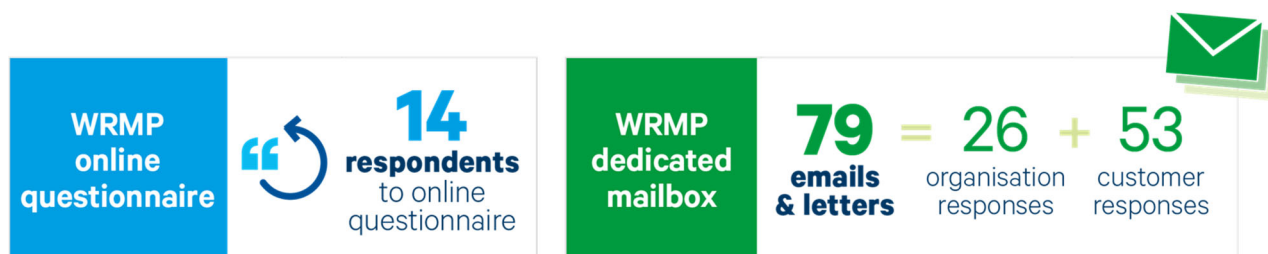
All consultation responses were then disaggregated into individual comments that were stored in a single spreadsheet (~500 individual comments). Each comment was then subjected to thematic analysis and categorisation (see below), before being allocated to the correct person to take the appropriate actions to adjust the plan, capture the changes in the Change Log and formulate a response for inclusion in the Statement of Response.

All consultation responses have been systematically addressed in the Statement of Response, in which the resulting changes made to the revised dWRMP24 will be signposted alongside the individual replies and also captured in a Change Log.

5 Summary of the consultation responses received

The following sections of our Statement of Response summarise the responses we received as well as providing an overview of how we have changed our dWRMP24 as a result.

A total of 79 responses were received to the consultation. A list of the respondents who provided representations on the dWRMP24, including the accompanying Strategic Environmental Assessment and Habitats Regulations Assessment reports, is provided in the table below.



Respondents and categorisation of feedback type

Organisations responding to the public consultation on the dWRMP		
Group category	Organisation	How they responded
Customers	53 individuals	Questionnaire or letter
Statutory Consultees	Devon County Council	Letter
	Environment Agency	Letter
	Historic England	Letter
	Natural England	Letter
	New Forest National Park Authority	Letter
	Ofwat	Letter
	Public Health Cornwall	Email
	Torrige District Council	Questionnaire
	Totnes Town Council	Email
	Wiltshire County Council	Email
Non-statutory organisations	Devon Wildlife Trust	Letter
	National Trust	Letter
	South West Rivers Association	Letter
	Westcountry Rivers Trust	Letter
	WildFish	Letter
	Woodland Trust	Questionnaire
Private businesses and Water Sector	Arqiva	Letter
	Everflow	Letter
	Market Operator Service Limited	Letter
	SP Water Ltd	Letter
	South West Infrastructure Partnership	Letter
	UK Water Retailer Council	Letter
	Waterscan	Letter
Consumer representative bodies	Consumer Council for Water	Letter
	National Farmers Union	Letter
	Waterwise	Email

Since the consultation closed on 09 May 2023, we have reviewed all the responses received and taken account of the material comments. This Statement of Response document provides:

- A **summary of the comments received** grouped by topic and by sector.
- **Appendix 1** sets out the individual questions and points made during the consultation, our responses to the issues and concerns raised, and will signpost to where the changes can be found in the revised WRMP.
- **Appendix 2** sets out the comments and feedback received during the consultation relating to the Strategic Environmental Assessment (SEA) and our responses to the issues and concerns raised.

This Statement of Response is being published on our website at:

<https://www.southwestwater.co.uk/environment/water-resources/water-resources-management-plan/>.

Everyone who responded to the consultation via Defra WRMP mailbox has received notification of its publication.

6 Summary of feedback received

In this section of the Statement of Response, we present a summary of the of the feedback and views we received during the consultation divided by **theme**. Within these summaries we have also categorised individuals and organisations into **five broad groupings**:

1. Customers
2. Statutory consultees
3. Non-statutory organisations
4. Private businesses and water sector
5. Consumer representative bodies

The distribution of these themes across the consultees is shown in the table on the following page and some headline figures from this analysis are shown below.



43%

of respondents supported the **environment** in their comments with issues such as nature-based solutions



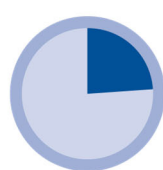
33%

of respondents proposed **leakages milestones**



30%

of respondents supported **infrastructure options** including reservoir building and management



24%

of respondents expect **ongoing consultation processes**, including continued engagement with customers and non-household businesses



30%

of respondents wanted to **encourage closer working together with retailers, partnerships and different councils**

Graphic (following page) shows the main themes we received feedback on from each consultee.

	Demand reduction	Leakage	PCC	Water Efficiency	NHH demand	Metering	Drought	Supply options	Abstraction	Reservoirs	Environment	NBS	Desalination	Recycling	Statutory duties	SEA / Habitat Regs	Service levels	CC mitigation	Growth / planning	Modelling	Best value	Collaboration	Funding / costs	Transfers	Consultation	Other	
Customers																											
53 individuals	✓	✓		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓		✓		✓	✓	✓		✓	✓		Rewilding, tourism	
Statutory																											
Devon CC	✓	✓		✓		✓	✓		✓	✓	✓	✓	✓	✓				✓			✓	✓		✓			
EA	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	
Historic England									✓		✓	✓	✓			✓		✓			✓				✓	Landscape/heritage	
Natural England				✓					✓		✓	✓			✓	✓									✓	Landscapes	
New Forest NP	✓	✓				✓			✓		✓												✓				
Ofwat	✓	✓	✓		✓	✓	✓				✓			✓		✓		✓	✓	✓	✓	✓	✓	✓	✓		
PH Cornwall														✓										✓		Emergency planning	
Torrige DC	✓	✓				✓					✓		✓	✓					✓	✓	✓		✓				
Totnes TC											✓									✓							
Wiltshire CC	✓		✓	✓	✓				✓		✓								✓								
Non-statutory																											
Devon WT	✓	✓	✓	✓	✓		✓		✓	✓	✓	✓		✓							✓						
National Trust		✓					✓				✓	✓			✓												
SWRA	✓	✓				✓			✓	✓	✓			✓													
WC Rivers Trust	✓		✓	✓	✓		✓		✓	✓	✓	✓		✓							✓	✓				Fish 'water banks'	
Wildfish											✓				✓										✓		
Woodland Trust	✓			✓		✓			✓	✓	✓	✓	✓		✓		✓	✓									
NHH / retailers																											
Arqiva	✓	✓	✓	✓	✓	✓												✓		✓		✓					
Everflow	✓		✓	✓	✓	✓					✓									✓			✓			Data sharing	
MOSL	✓	✓	✓	✓	✓	✓	✓							✓													
ESP Water Ltd																				✓							
SWIP	✓			✓		✓					✓			✓													
UK WRC	✓		✓	✓	✓	✓					✓																
Waterscan		✓	✓		✓	✓	✓		✓		✓							✓					✓		✓		
Consumer Reps.																											
CCW	✓	✓	✓		✓	✓					✓						✓								✓	Boreholes	
NFU				✓	✓		✓		✓	✓	✓	✓		✓	✓		✓						✓	✓			
Waterwise	✓	✓	✓	✓	✓	✓	✓				✓							✓					✓	✓		Water labelling	
	18	14	12	15	13	15	11	2	13	8	23	10	6	11	9	3	5	7	9	5	8	10	6	7	19		

1. 'Process' includes narrative, consistency of data, methodologies, options screening and appraisal, criteria, adaptive planning, scenarios, monitoring.
2. 'Statutory requirements' includes compliance, licences, evidence gaps, alignment with other plans, uncertainties, timescales, resilience, HRA.
3. 'NBS' includes issues around Biodiversity Net Gain, Natural Capital Accounting, marine, environmental protection and enhancement.
4. Public concerns regarding shareholder dividends, lack of investment, renationalisation, DWMP issues and sewage releases not included.

In the following summary of key issues, a group will not be listed if no material issues on the topic were raised by consultees within that grouping.

6.1 References to non-water resources issues

Several customers have responded to the consultation to tell us how angry they are about releases of diluted sewage into the environment and that they think shareholder dividends and executive salaries should be cut. We understand this is a true representation of the strength of their feelings. However, as these views are not about water supply and securing future resources, we are unable to provide a specific reply to these points in this Statement of Response.

We care what our customers think about us and the services we provide. All the comments made by our customers that are not directly related to water resources and supply have been shared with the relevant people in SWW to capture the appropriate responses. Issues relating to drainage, sewage and wastewater management have been forwarded to our colleagues managing our sister strategy, the Drainage and Wastewater Management Plan (DWMP) for their consideration.

More information about the DWMP can be found at: <https://www.southwestwater.co.uk/about-us/what-we-do/dwmp/>

6.2 Overall approach and narrative

6.2.1 Customers

Many customers support the aims and objectives set out in the dWRMP24. However, they said that the dWRMP24 should emphasise meeting legal obligations as the most important priority.

6.2.2 Statutory consultees

Our regulators asked us to rewrite our dWRMP24 as more evidence is needed to underpin the proposals. It must be aligned with the West Country Water Resources Regional Plan, be informed by Ofwat's public value principles, and explain how these have been used to identify our preferred 'Best Value' plan. There should also be an explanation of how the outcomes of stakeholder and customer engagement have been used in decision making.

Assessing current and future water needs shows the gap between supply and demand and the scale of investment required. Prioritising demand reduction measures over supply-side measures, unless monitoring shows demand is still too high, is supported. However, the supply options presented may not be viable on the grounds of environmental impact and a stronger emphasis on wider catchment and nature-based solutions is needed.

The characteristics and heritage and assets of the region, such as the four World Heritage Sites, historic cities, towns and settlements, its landscapes, rivers and coastal areas, should be described as these are unique aspects of the South West.

The Board must provide assurance that the WRMP24 and the expenditure proposals are deliverable in the context of the wider PR24 business plan proposals.

6.2.3 Non-statutory organisations

Long-term water resource planning and environmental management at a catchment scale should be holistic incorporating the impacts of climate change, landscape, heritage and nature. Non-statutory organisations commented that the WRMP24 must take an environmentally responsible and sustainable approach with clear SMART aims and objectives.

6.2.4 Private businesses and water sector

On the whole, the efforts made to meet the supply and demand challenges in the coming decades is supported, even though there is still room for improvement. Reducing demand for water is central to meeting demand over the next 25 years whilst keeping water prices low – critical given current cost-of-living crisis. Investing in improving drought resilience, reducing leakage, and reducing per capita consumption must be carefully managed.

Threats to water security, water quality, and water stewardship are very much current issues so the narrative around water supply and demand must reflect the need for efficiency, shared responsibility and innovation.

6.2.5 Consumer representative bodies

This group of consultees said that the dWRMP24 clearly referenced Government targets around leakage, per capita consumption (PCC) reduction, as well as net-zero carbon emissions. However, there should be more ambition to move above and beyond the Government targets.

There could be a year-by-year graphic of supply and demand now and into the future, showing when demand may start to outstrip supply. This would show the scale of the issues and illustrate whether the proposed solutions are appropriate. A second graphic, showing the supply and demand forecast after the best value interventions could show how planned investment will address the problems.

6.2.6 Our response to comments on ‘Overall approach and narrative’

We are taking steps to provide a full explanation of the process for delivering our core plan, along with detailed justification for our decision making. We will select options on the basis of our assessment of their likely performance against a range of metrics that reflect SWW's strategic objectives of enhancing the natural environment, ensuring resilience of supply and delivering benefits to society, as well as cost to consumers. This will form part of our revised dWRMP24.

6.3 Demand Management

6.3.1 Customers

The impact of tourism, especially in summer when water shortages are most likely, is of real concern to many. There is a perception that residents are expected to reduce their water use whilst tourists can use as much as they want including to repeatedly fill hot tubs. Some customers suggest that a water tax on short term visitors could help improve this situation.

Some customers say they have already reduced their water use as much as possible and are disillusioned that they are being asked to make more water savings while they perceive that leakage has not been satisfactorily addressed.

Some customers think that the WRMP24 should focus on providing water to meet needs, not demands. Some also think that, to encourage lower usage, we should implement a pricing structure with a lower charge up to a certain level of use and then priced considerably higher for use above that level.

6.3.2 Statutory organisations

Some suggest that our plans for demand management are not ambitious enough, given the scale of the climate emergency. Consultees suggest that some local authorities across the region have policies adopting higher water efficiency standards than those proposed in our dWRMP24.

One consultee suggested that demand is rising higher than the 6% forecast, so we may not be able to provide adequate security of supply given the future risk of drought. They suggest that further options

need to be identified to address potential future shortfalls. Some also said that, while the plan includes an appropriate number and range of feasible options to balance supply and demand, the high demand scenario should be reassessed and revalidated.

The target to reduce demand by 20% by 2037-38 is supported by statutory organisations but the expected reductions in leakage, household consumption and non-household consumption should be clearly quantified to show how this will be achieved. There were also calls for greater clarity on the level of resources allocated to demand reduction measures, as they require more time and effort to be successful.

6.3.3 Non-statutory organisations

Opinion was that the dWRMP24 approach is overly reliant on demand reduction but with little evidence that leakage reduction measures will be met or that customer behaviour change will be successful. There needs to be an underpinning communication and education strategy.

Unless demand management and water efficiency measures are successful, the adverse impacts on the natural environment and fisheries will be inevitable. There are no measures planned to mitigate these impacts.

Government policies and regulations on water efficiency labelling, water efficiency standards for new development, environmental land management funding that supports water storage and efficient use are needed to support the delivery of the WRMP24. Non-statutory organisations said that we need to be vocal on these issues.

6.3.4 Private businesses and water retailers

Retailers have the primary relationship with non-household (NHH) customers and would like a nation-wide approach to demand reduction, funding, incentives, and services.

This group of respondents said that the WRMP24 should recognise and identify the needs of the agri-food, drink and tourism sectors and additional demand options should be developed for these sectors.

Some called for more evidence that the significant investment proposed for demand management will deliver the expected and necessary savings. When referring to customers, household or NHH must be defined.

6.3.5 Consumer representative bodies

The Government has set a target of a 15% reduction in NHH water use by 2050, with an interim target of a 9% reduction by 31 March 2038. Consumer representatives said that these targets should be acknowledged in the WRMP24 with a budget allocated to support roll out and to promote the benefits of water efficiency to customers.

NHH water saving measures, such as efficiency visits and smart metering should also be budgeted for. One consultee suggested that a trial incentive scheme for reducing water use could also be considered.

This group highlighted that there should be more ambitious policy-led solutions for new build and for retrofitting existing properties, and collaboration with Planning Authorities to ensure these are implemented.

6.3.6 Our response to comments on 'demand management'

We are taking all the comments received on demand management into account and are considering the feasible options to reduce demand and provide sufficient certainty in delivering a sustainable and resilient water supply. Our revised dWRMP will ensure we deliver the specific leakage targets. This will drive a very sizeable investment in leakage interventions. We will ensure that any additional water required to meet demand will be provided by the best-value options.

6.4 Leakage

6.4.1 Customers

Many customers have strong views about leakage, which is thought by some to be a major contributor to water shortage issues. Some suggested that addressing and stopping leaks should be an immediate priority ahead of building new reservoirs or desalination. Some customers actively resent being asked to reduce water use whilst leaks have not been addressed.

6.4.2 Statutory organisations

Some respondents suggested that the scale of water lost through leakage dwarfs all the other water saving initiatives. Some statutory consultees have also suggested that the current leakage targets are not being met. In their opinion, halving leaks by 2050 is unambitious, particularly in critical catchments such as the Hampshire Avon. Plans must be accelerated to reduce leaks by 50% during the next AMP (Asset Management Plan) (2025- 2030) and the current leakage recovery programme could offer effective, cost-effective, and evidenced solutions.

Statutory organisations outlined that the potential savings from preventing leaks are not quantified but must be to understand how much is being lost and could be saved.

They also called for the supply pipe repair subsidies offered to customers to be articulated clearly.

6.4.3 Non-statutory organisations

Feedback from this group was that leakages should be addressed prior to developing new assets such as desalination plants.

6.4.4 Private businesses and water retailers

Opinion is that leakage rates are excessive, but this may be due to the high starting point. However, the current targets do not seem challenging so greater clarity and justification concerning the selection of specific goals and deadlines for addressing leaks should be set out. These consultees believe that allowing high leakage rates discourages customers from changing their behaviours and sends the message that high leakage is both acceptable and to be expected.

6.4.5 Consumer representative bodies

There should be more detail about innovations that could address leakage especially as there is substantial household and non-household support for fixing leaks.

6.4.6 Our response to comments on 'leakage'

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, but this could require a sizeable investment in leakage interventions. In response to comments received from statutory stakeholders, we will clarify the water saved through leakage reductions in our final WRMP.

6.5 Per Capita Consumption

6.5.1 Statutory organisations

The government expects annual average per capita consumption (PCC) to reduce to 110 litres per head per day by 2050. Statutory organisations outlined that a more ambitious programme for reducing PCC is

therefore required in our WRMP especially as they think it is unlikely that the expected WRMP19 PCC levels will be met for a variety of reasons. They re-emphasised that substantial efforts will be needed for the rest of this AMP7 period to meet the PR19 performance commitments.

This group said that customer behaviour change campaigns should be reviewed to understand which are the most successful and these should be brought forward for early implementation. The cost of achieving the target for PCC must be included in the Plan.

6.5.2 Non-statutory organisations

PCC reduction targets will be predicated on government legislation on standards for household appliances, product water labelling and building standards. These respondents suggest that lobbying from the water industry for government support could be included in the plans.

6.5.3 Private businesses and water retailers

It is easy to rely on national targets as this facilitates PR24 funding. However, whilst noting that PCC excludes NHH, it is essential to go further than Government-set targets.

6.5.4 Our response to comments on 'Per Capita Consumption'

Our revised dWRMP24 will include significantly greater demand management activity for both HH and NHH. Our updated decision-making chapter will set out a comprehensive explanation of how we have optimised our blend of demand-side interventions to achieve both our PCC reductions and the overarching consumption reduction targets set by the government.

6.6 Water efficiency

6.6.1 Customers

Customers suggested that more water saving shower heads should be offered to help people reduce their water use, especially for houses with more than one bathroom. One customer said that there should be mandatory policies for high efficiency flush toilets, including "dry pan", for all new-build residential property, a ban on "power showers", and promotion of high efficiency domestic appliances.

Some customers felt that collecting and storing rain in water butts for garden use will not result in sufficient water savings, as collected water will only last a few days when there is no rain. They suggested that a larger scale programme to collect and store residential urban rainfall run off should be established, as this will have a greater impact on water conservation than the domestic water butts.

6.6.2 Statutory organisations

The view of these consultees is that the impact of tourism on demand for water is seriously underestimated. They suggest that additional options should be considered that take seasonal ingress into account and that more clarity is required on water efficiency expectations for the holiday rental market. They also suggest that significantly improved levels of water efficiency are needed for the business sector.

6.6.3 Non-statutory organisations

Feedback from this group included the idea to increase the roll out of free water butts and other water saving devices to enable people to be more water efficient. They suggested we should work with government to make water saving devices a requirement for new builds.

6.6.4 Private businesses and water retailers

This group stated that achieving water efficiencies should focus more on NHH as they use 30% of water supplies and could be essential to deliver reduction targets, but there is low awareness of water scarcity issues. They call for the inclusion of more proactive information, targets and incentives so that it is simpler for NHHs to engage with efficiency.

Some consultees require more detail on how water efficiency services will be offered to different categories of NHH customers. However, they do not think wholesalers should offer these directly to NHH customers and that it is important for adequate funding to be transferred to retailers to cover marketing, service provision, leak detection and water efficiency audits and products. They also state that this funding needs to reflect the cost of delivering such services.

These stakeholders said that keeping retailers informed and involved in communications between wholesalers and customers is crucial to maintaining great customer service.

6.6.5 Consumer representative bodies

Consultees believe that customer engagement and behaviour change is vital to success. They indicate that water efficiency activities including a programme of targeted home and business water saving visits, costs and benefits and delivery timescales are clear. However, they also suggest that water efficiency campaigns should include information on dual flush buttons for toilets, water saving shower heads, highlight the potential savings of reduced water and energy bills and introduce, if possible, new tariffs and rewards for customers for reduced water use.

This group of respondents said that the anticipated competition between retailers to drive NHH water efficiency hasn't yet happened. They believe that there are insufficient incentives for NHH to change behaviours and request water efficiency support from their retailers, and nor are there sufficient incentives for retailers to provide support on efficiency measures for NHH in the absence of customer demand. They call for this to be addressed in the WRMP24.

The fix programme for 'leaky loos' is welcomed by this group of consultees, as is the offer of home water audits and educational/school visits. They indicate that customers want to be given useful advice on being more water efficient, rather than being told what not to do.

6.6.6 Our response to comments on 'water efficiency'

We are clarifying our targets and timescales for our revised WRMP including NHH consumption and incentives, where applicable, for NHH water efficiency measures. We are keen to work closely with our retailers so they can offer effective water efficiency services to NHH customers.

We will continue with our customer engagement team to promote water efficiency measures and discuss water efficiency policies with regulators.

Our option summaries will provide information on the expected uptake and likely promotion activities for each water efficiency activity.

6.7 Non-household (NHH)

6.7.1 Statutory organisations

The view of some statutory organisations is that the forecast for NHH water use and efficiency reductions in the dWRMP24 will not meet the Government's 2023 Environment Plan targets. They suggest that this must be addressed through stronger collaborations with retailers and additional options developed for the

sector, and that an ambitious strategy for NHH demand reduction is required, including an explanation of how NHH consumption trends have impacted the selection of the best value options.

6.7.2 Non-statutory organisations

Consultees in this group believe that opportunities to reduce NHH demand, particularly around the agricultural, tourism and industry sectors, are significant. These stakeholders suggested that the high-water use sectors, such as dairy farms, could be offered grants to harvest and store rainwater for use during droughts rather than using potable supplies. Where water-harvesting interventions will not provide adequate supplies, alternative water reuse/recycling/reclamation schemes should be considered. They suggest that targets could be included for providing support for increasing rainwater harvesting.

6.7.3 Private businesses and water retailers

Feedback showed that these stakeholders thought there is a lack of consideration about how the WRMP24 will affect NHH customers and a lack of transparency and clarity around the impact decisions will have on business customers.

Retailers believe that they can help drive down NHH water usage so a mechanism should be developed that empowers retailers to offer water efficiency, leakage reduction and net zero services to NHH. They also state that statutory requirements are to protect domestic water supplies over and above NHH properties, but this should not translate into normal operating practice, particularly when NHH are proactive in managing and reducing their water use.

6.7.4 Consumer representative bodies

These respondents support options to reduce NHH water demand and the proposals for dedicated work with agri-business and holiday rentals, which they consider to be a key economic consideration for the South West.

6.7.5 Our response to comments on ‘Non-household (NHH)’

We are in the process of developing a revised NHH demand-side strategy that considers a wide range of 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.

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.

6.8 Metering

6.8.1 Customers

Several customers feel that increasing the roll out of smart meters would encourage people to know more about their water usage and to see the positive benefits of using less. They also suggest that customers may need to be incentivised to use less by offering discounts to low users and penalising high users, and that smart meters may make this easier.

6.8.2 Statutory organisations

Installing smart meters to identify where intervention is needed seems sensible to statutory organisations and mirrors the way energy is managed. The metering strategy is based on replacing the current meters with AMI (Advanced Metering Infrastructure) by 2035 as well as a mix of optional/compulsory metering for

unmetered properties. However, consultees raised concerns that the costs for the additional system upgrades were not included in the dWRMP24 and this must be evidenced. They asked whether 'change of occupier' metering has been considered and called for this to be explained more fully in the plan.

The Roadford supply zone is the only zone not listed for AMI metering but statutory organisations felt it should be as it was subject to a TUB (Temporary Use Ban) and a drought order had been applied for.

6.8.3 Non-statutory organisations

Smart meters and other actions to help customers and businesses reduce usage and find and stop leaks are welcomed by this group. They suggest that the significant level of meter penetration already achieved could be used to rapidly introduce rising block tariffs to reduce demand. They suggest that this would help ensure affordable supply for essential use whilst having minimal effect on overall bills.

6.8.4 Private businesses and water retailers

This group was disappointed that the metering section in the dWRMP24 only covered household metering, especially as smart meters can help to detect leakage in NHH pipes. They felt that Defra's 9% water reduction target for the NHH market by 2038 should be referenced.

Consultees call for a clear acknowledgement of the potential of the NHH market to reduce water consumption, timescales for achieving the 9% reduction target and detailed plans for rolling out / retrofitting more NHH smart meters broken down by AMR (Automated Reading) and AMI type.

The number of NHH meters in the SWW region is just under 6,200, accounting for around 8% of the meter asset base. Almost 14% of the NHH meters have not entered a meter reading onto CMOS (the database that manages all the electronic transactions involved in switching customers and provides water usage and settlement data) for 12 months or more.

One consultee felt that the current lack of granularity of consumption data makes it difficult for NHH customers to assess potential benefits of water efficiency interventions. These stakeholders suggest that funding is needed to overcome this significant deficiency in data quality, or it will constrain the ability to progress water efficiency and demand reduction in the NHH market.

Critical consideration of the presumed causal link between smart meters and reducing water use is needed to justify the £57.4 million investment into smart metering to 2030. The Plan recognises the value of working with retailers to better engage with NHH on water efficiency to reduce consumption. The final Plan should show how these partnerships will work and be managed.

Smart meter benchmarking data should be shared with retailers and MOSL, and the benefits of meter data shared with retailers and customers.

6.8.5 Consumer representative bodies

Opinion is that moving customers from unmeasured to metered charging and the proactive replacement of existing meters with smart meters is a positive move and is a game changer when it comes to reducing leakage and engaging customers on daily water use and water wastage.

These groups believe that smart meter installation may also prove key to future successful innovative tariffs. However, they also indicate that because smart metering has been established as the default position for the water industry, extension plans no longer seem impressive.

Consumer representative bodies request more detail on what kind of smart meter data will be available, in what form, from what date, to who, how it will be provided and at what cost must be disseminated.

Water-essential businesses are very sensitive to interruptions to their water supply but have limited understanding of what the meter installation process entails. Customer representative bodies told us that there should be more information about intentions to communicate with business customers on metering and water use.

6.8.6 Our response to comments on ‘metering’

We will be providing WRZ level metering options in our WRMP options tables, to provide clarity on the selected components of our metering strategy. The feasible options to be assessed comprise; meter optants, change of occupancy, compulsory metering in some locations, universal metering, NHH metering, dual billing, increased meter reading frequency, meter upgrades to Advanced Metering Infrastructure (AMI) smart meters.

6.9 Drought

6.9.1 Customers

Some customers were shocked at how quickly a hot dry year reduced the level of reservoirs and caused water supply problems and restrictions. One suggested that river flows should be given priority over consumer needs in drought situations, and another suggested that if there had been more investment in supply infrastructure, contingencies for drought would not be needed in the wettest part of the UK.

For some customers, the need for an acceptable level of reservoir storage is of over-riding importance. Some think that we should build more reservoirs on the region’s moors to collect rainwater.

There was some support for a higher level of drought resilience, and it was suggested that the plan must be able to adapt if the current predictions used for climate change prove to underestimate the speed of change. Some consultees suggested that the WRMP does not reflect our recently published Drought Plan.

Customers said that blue badge holders who need water for medical reasons must be prioritised during drought, but this doesn’t mean they should use water for their gardens and cleaning their cars.

6.9.2 Statutory organisations

Statutory consultees believed that the frequency, type and scale of proposed drought interventions do not reflect the nature of the 2022 drought. The dWRMP24 showed a greater reliance on supply-side solutions rather than demand management as this provides more certainty. An advanced systems response plan is required, reflecting lessons learnt, explaining how drought resilience will be improved and setting out the minimum levels of customer service that will be provided.

They suggest that a severe drought could be considered a civil emergency, so the actions needed in such a situation need to be set out. They call for a wider range of drought durations (starting earlier and / or extending longer) to be considered, with evidence of robust sensitivity testing for achieving 1 in 500-year drought resilience.

Some consultees indicate that the assumptions on reservoir controls, the duration of peak demand, bulk agreements, the resilience of groundwater to drought, impacts on deployable output (DO) and drought permits need to be revisited. Statutory organisations said that potential changes to abstraction licences and drought permits must be clear and include any intentions to make these permanent.

6.9.3 Non-statutory organisations

One consultee stated that the 2022/23 drought seemed to have caught the region off guard. The increase in public consultation around drought permit orders and the active participation of local communities in drought management is welcomed by these respondents. However, they also raised concerns if the response to the drought was to abstract more from rivers as continual abstraction and drought permits are not sustainable and will lead to significant environmental losses. Non-statutory organisations commented that pressurised water bodies should be monitored to ensure active drought management measures have a minimum impact on biodiversity. Strategic, nature-based, regional level drought resilience measures must be developed in parallel with a new infrastructure programme.

6.9.4 Consumer representative bodies

At the time of the consultation, the South West has areas which remain in drought. These consultees expressed their support for solutions suggested in the plan, such as a network of 1,000 ponds and lakes creating a deployable 'water bank' that can be used either for local agricultural demand, fish rescues or for environmental augmentation during extreme droughts. They believe these types of strategic regional drought resilience measures are required in parallel with new infrastructure such as desalination plants and effluent recycling to ensure the situation in 2022 does not recur.

These stakeholders said that collaborations with farmers and land managers are part of the solution to protecting existing 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.

6.9.5 Our response to comments on 'drought'

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. Furthermore, we have refreshed our drought options (further considering the implementation costs, GHG emissions, water saved and wider societal benefits), and as part of decision making, we will ensure that the use of our drought options is aligned with our drought plan or explain the reasons for any differences.

6.10 Supply

6.10.1 Statutory organisations

Feedback said that the dWRMP24 needs to identify a greater range of sustainable supply options. Those identified may cause further environmental deterioration, are not aligned with the WINEP (Water Industry Environment Programme) and need further detailed modelling to reduce risk and uncertainty. These include potential raw water transfers, the proposed new abstraction point from the River Camel and the new quarry reservoir in the Fowey.

Statutory consultees say that clarity is also needed on the licences for boreholes and reservoirs and whether these are for permanent use or for drought only, and for increasing capacity at treatment works.

They also suggest that proposed headroom to meet the demand-supply balance is high compared to most other water companies and therefore the investment proposals are significant. They say that more evidence is needed to show that the headroom allowance is appropriate and is not driving unnecessary and 'high regret' investment.

The view from statutory organisations is that abstraction from quarries, new reservoirs and de-salination plants do not seem to be fully considered. There will be considerable construction work, high embodied carbon costs and operational energy costs with these approaches, so resources should be assessed against a hierarchy of best environmental options.

6.10.2 Non-statutory organisations

These groups believe that there could be huge potential increases in water demand to meet the needs of the agriculture and energy sectors. Feedback provided states that it is essential that wherever possible water-hungry supply options should be sited in places where there is water available, and they should not add to existing water availability problems.

6.10.3 Consumer representative bodies

There was support from these organisations for acting now, as it will be too late to start planning supply-side solutions until they are needed. They told us our customers expect supplies to be resilient in the short and long term.

6.10.4 Our response to comments on 'supply'

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.

We have looked at the PR24 WINEP programme and have done some assessment on the impact and are considering specific comments on infrastructure options.

6.11 Abstraction

6.11.1 Customers

Customers' feedback indicates that extra water being taken from our rivers and lakes to supply homes and businesses has a significant negative impact on local rivers and migratory fish. One customer stated that nearly 10 billion litres of water is being taken from the environment. Some stated their belief that the WRMP24 should be about reducing abstractions rather than proposing to take more.

6.11.2 Statutory organisations

Statutory organisations told us that abstractions need to be limited and sustainable to prevent environmental deterioration in all rivers and protected areas. Abstraction reduction figures are lower than expected, this may not be consistent with Environment Agency advice or include the best available information and therefore should be revised. Early interventions on abstraction reductions are needed, before the proposed 5 to 20 years, to ensure the environmental destination expectations can be met.

Statutory consultees also suggested that if abstractions are not reduced in sensitive locations, such as the River Avon and the Otter valley, there is the potential for 'water neutrality' controls to be implemented by Natural England (NE) to prevent harm. They indicate their perception that this will be seen as a failure of water resources planning, which should enable, not constrain, sustainable growth.

This group of respondents told us that a description of the alternative demand options which reduce, minimise or potentially remove the need for abstractions must be included.

6.11.3 Non-statutory organisations

Water is abstracted from the environment and targets must be set for reducing abstraction from sensitive areas. Climate change means the future for the natural environment and biodiversity is very uncertain so the precautionary principle must be adopted. Further abstraction must not result in unacceptable impacts. Water should be used where it is available, rather than transferred, as this will have fewer long-term detrimental impacts.

6.11.4 Consumer representative bodies

We were told that the impact of reduced water availability on the agriculture and food sector must be taken into account. Reduced water availability will affect food production in terms of the area used to grow

crops and varieties, impact on processing and manufacturing sectors, employment, rural economies, tourism and the environment as well as the individual business.

They told us that the agriculture sector must be engaged on potential implications for abstraction licences and water availability overall. It is not acceptable to advise abstractors at the time of licence renewal that changes will be made to the volume available. They must be engaged at the very start of any programme looking to change or vary abstraction licences to ensure all the implications are understood by every involved party.

6.11.5 Our response to comments on 'abstraction'

We have a statutory duty to meet the demand for water and protect public health, while also achieving sustainable abstraction and protecting and improving the environment.

The protection of sensitive and environmentally designated sites is of particularly vital importance, which is why we are proposing abstraction capping in certain sites. 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.

Our abstraction licences are agreed with the Environment Agency to ensure the needs of the environment are protected. 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.

6.12 Water storage and reservoirs

6.12.1 Customers

Customers that responded to our consultation think that more reservoirs should be constructed, and existing reservoirs could be enlarged with surface water pumped to them for storage until needed rather than out to sea. One suggested that large underground storage areas should be considered, located either under farmland or to be covered with solar panels to power operational needs, while smaller local underground storage facilities could be fed by pumped water from larger units. They suggested that power could come from solar arrays or from hydro generating stations installed on dams and overspills, and that many small units on rivers would ultimately produce a lot of power.

6.12.2 Non-statutory organisations

This group of stakeholders told us that there is insufficient reference in the dWRMP24 to the transformative development of the three strategic reservoirs and river regulation schemes. They believe that planning should commence immediately as delivery takes a long time and it is never too soon to start. Otherwise, this leaves only tactical developments which may be inadequate to meet the planned 1:500 resilience target. They add that environmental impact of repurposing quarries needs careful consideration.

6.12.3 Consumer representative bodies

Customer representative bodies told us that opportunities to develop multi-use water storage and reservoirs by working with farmers, the agricultural industries and landowners should be seized upon. Building new reservoirs across the South West and expanding strategic water supply infrastructure to meet the growing demand for water supply is supported by the agricultural sector. However, it is critical that farming businesses benefit from the additional water resources that new reservoirs will provide to build resilience in domestic food production systems. 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.

6.12.4 Our response to comments on ‘water storage and reservoirs’

In response to the comment on the development of the three strategic reservoirs and river regulation schemes we are exploring more strategic regional options to support our supply-demand balance in the future.

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.

6.13 Nature Based Solutions

6.13.1 Customers

Customers told us that there is a large amount of land that could be comprehensively enhanced to make a major contribution to increase oxygen and reduce carbon dioxide levels. Dartmoor Forest should be re-forested with oak, hawthorn and other native deciduous trees. This is a major undertaking, but you could make a significant difference to climate change if this is approached on this scale.

6.13.2 Statutory organisations

The opinion of statutory organisations was that changes to land-management can achieve multiple benefits. The introduction of Environmental Land Management schemes (ELMs), a subsidy scheme for farmers to support sustainable farming activities, means land managers and farming communities can make timely and critical contributions to nature-based solutions for water resources.

6.13.3 Non-statutory organisations

Water services should enhance our public environmental goods. Whole catchment management, peatland restoration and using disused quarries for water storage will support biodiversity increase and carbon capture as well as provide leisure and recreation opportunities. Stakeholders told us that biodiversity net gain should align with priorities being set out in Local Nature Recovery Strategies and go beyond the 10% minimum requirement to at least 20% gain. Nature based solutions should be embraced above hard engineering.

Non-statutory organisations highlighted that there is too much focus on engineered solutions, such as water shunting, quarry reuse and desalination. Engineers can, and should, provide specific solutions. However, the construction of new facilities can impact irreplaceable habitats such as ancient woodland, and the WRMP24 should move towards Integrated Catchment Management to reverse the catchment changes seen over the last 50 years. An integrated approach that delivers multiple environmental and societal outcomes rather than a single engineered solution will provide best value rather than lowest cost. Farm water surface storage and augmented aquifer recharge should be incentivised.

The tools and partnerships already exist to co-create and co-deliver environmental solutions for catchment, habitat, public and community resilience as well as across infrastructure and policy domains. A wider array of tools and organisations should be involved in developing the plan and schemes.

6.13.4 Private businesses and water retailers

The proposed investment into environmental studies between 2025-2030 is strongly supported by these respondents. The findings of these studies should be shared widely.

6.13.5 Consumer representative bodies

Incentives, resources and support for deploying nature-based solutions that will restore, manage and protect our water resources and restore wetlands while also providing social and economic benefits to rural communities should be offered to the farming sector. However, it is vital that new infrastructure development does not adversely impact food production and incomes of the agricultural industries.

Farmers are required to work to strict regulatory standards and adhere to both voluntary and industry standards. There are many opportunities for farmers to deliver higher levels of clean water for the benefit of the environment, businesses and society as a whole. Even with the development of the new Environmental Land Management Schemes (ELMS), there is still uncertainty whether farmers will be incentivised for helping to improve the natural environment to help support water quality. South West Water should work closely with key partners to help support and engage with landowners to ensure best outcomes for water quality and resilience.

6.13.6 Our response to comments on 'nature-based solutions'

Given the feedback on this topic, our revised dWRMP24 will set out our approach to the use of catchment and nature-based solutions to contribute to meeting water resources challenges. To meet this challenge, 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 their 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) and the 'Green First' framework.

We will continue to engage with the agricultural industries and landowners to support initiatives such as wetland creation, restoration and protection and look forward to continuing collaborations.

6.14 Desalination

6.14.1 Customers

A customer stated that desalination plants in the South West, where it rains constantly, seem like an expensive distraction. They felt that all the positive and negative impacts of desalination should be explored in full before major investment in desalination takes place.

6.14.2 Our response to comments on 'desalination'

Desalination is being investigated in light of the 2022 drought. 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 undertake customer acceptability testing of the proposals before the detailed plans are developed.

6.15 Recycling and water harvesting

6.15.1 Customers

Customers felt that too much surface water is wasted by being pumped directly into the sea when it could be diverted and captured for underground storage. The dWRMP24 identifies the need for desalination and more reservoirs but recycling treated effluent should be prioritised above these options.

Opinion is that domestic wastewater from sinks, showers and washing machines should be recovered and recycled to flush toilets. Facilities for rainwater harvesting should be incorporated into new build alongside systems for domestic grey water recycling.

6.15.2 Statutory organisations

Whilst supportive of initiatives for property level water harvesting, there are risks from legionnaires disease, crypto parvum, giardia and E coli if the water becomes stagnant. Statutory stakeholders told us that customers need to know how to store water safely, use appropriately and not to use it for watering edible plants.

6.15.3 Non-statutory organisations

Plans for recovering, recycling water and diversifying water supply are supported by this group of respondents. There needs to be many more facilities for storing water and recycling water. However, the current level of ambition for effluent reuse is disappointing, especially in relation to agriculture.

Demonstration projects should be trialled to show the best value benefits of an increase in water resources, improved urban drainage and river resilience and alignment with other strategies including River Basin and Catchment Management Plans. All initiatives must be subject to appropriate environmental and biodiversity assessments and environmental monitoring programmes put in place.

6.15.4 Private businesses and water retailers

Final effluent reuse and recycling possibilities are supported by this group of stakeholders, and options should be explored. Supporting households to utilise rainwater harvesting and greywater systems is vital to reduce potable use.

6.15.5 Consumer representative bodies

As part of feedback received from consumer representative bodies, we were told that there is an opportunity to work with retailers to support businesses with harvesting rainwater and grey water recycling. Large retail units or distribution depots with extensive roofs and impermeable parking areas are prime candidates. This could reduce potable water consumption whilst have the added benefit of delaying high rainfall impacts on the sewer network, potentially reducing CSO (combined sewer overflow) discharges.

Large water tanks could be supplied to farmers to collect rainwater which can then be used for cleaning, washing out of livestock trailers and equipment, watering animals, plants and crops which do not require sterilised water or taking water from the mains. This would reduce the demand for water from farms, reduce run off from concreted/roofed areas and thereby reduce the risk of flooding and water contamination.

6.15.6 Our response to comments on ‘recycling and water harvesting’

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 will develop more water recycling proposals in future iterations of the WRMP. Recycling of wastewater is only possible using treated effluent from wastewater treatment works. 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 would, of course, be applied to major new infrastructure such as wastewater recycling.

6.16 Statutory requirements

6.16.1 Customers

Customers reiterated that supplying water to meet customers' needs is our responsibility. The Environment Agency should be funded sufficiently to carry out its monitoring role and ensure we are meeting UK laws and regulations. EU legislation protecting the environment must be maintained.

6.16.2 Our response to comments on 'statutory requirements'

We have a statutory duty to ensure the needs of all water users are met and protected. We are committed to working with our environmental regulators and environmental groups..

6.17 Strategic Environmental Assessment (SEA) and the Habitats Regulations

6.17.1 Statutory organisations

Although the SEA has been conducted to a satisfactory level, consultees suggested that out-of-date National Framework data was used in the Strategic Environmental Assessment (SEA) published with the dWRMP and that this led to incorrect conclusions being drawn. Statutory organisations also had questions regarding the cumulative impacts of the proposals, compliance with duties to restore impacted and degraded designated sites, meet the environmental destination and for nature recovery. They stated their belief that that a precautionary approach is required. Consultees also felt that the WRMP would not deliver the requirements of the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations), and that delivery of these requirements must be completed in the quickest technically feasible timescale. They also stated that abstractions must be reduced as soon as is practicable.

6.17.2 Our response to comments on 'SEA and the Habitats Regulations'

Now that both our own and Wessex Water's dWRMP24s have been published and more information is publicly available, we will expand on the cumulative effects within the next iteration of the dWRMP24. However, there is still some uncertainty due to insufficient information in relation to the effects of specific options for Habitats Sites. Additional assessments and studies will be needed to inform the findings and develop associated mitigation measures for potential impacts which cannot currently be quantified. When sufficient information is available it will be reflected in updates to the relevant assessments.

We will provide a full in-combination assessment in the revised version of the Habitats Regulation Assessment (HRA) in Autumn 2023 including the timescales for detailed design, supporting assessments and further studies.

6.18 Service levels

6.18.1 Customers

Unannounced, unexpected and sudden increases in water pressure can disconnect mains supply and result in damage and water loss. Customers have told us that pressure increases should be incremental over a day or two to avoid sudden stress on pipes and joints to save hundreds of thousands of litres of drinking water which is not only an unnecessary waste but also incredibly damaging for property and its contents.

6.18.2 Consumer representative bodies

The duty to supply domestic customers with water does not extend to commercial customers. However, these consultees believe that there should be an outline of the steps that will safeguard the levels of service in water supply to rural businesses. In particular they highlighted that water is a key resource that underpins the viability and profitability of the farming industry whether arable, horticultural, livestock, poultry or dairy farmers, and that when connections are broken, livestock farms require rapid action to restore supplies and soft fruit crops can die in a matter of hours without water.

6.18.3 Our response to comments on ‘service levels’

We acknowledge that during periods of low water availability that sectors of the industry 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.

6.19 Climate change, carbon and net zero

6.19.1 Customers

Some customers suggested that there should be investment in renewable energy especially wind farms, plus gravity storage systems to run our business operations. Customer feedback also told us that there is plenty of scope for this on the regions’ moorlands.

6.19.2 Statutory organisations

This group said that the Devon Carbon Plan sets out clear priorities for de-carbonisation and could provide a useful framework for action.

6.19.3 Non-statutory organisations

These consultees noted that the dWRMP24 sets out the impact on carbon emissions, but called for the preferred solutions to be those that reduce total carbon emissions from capital emissions, operational emissions and those arising from water use.

6.19.4 Private businesses and water retailers

Some consultees in this group stated that environmental protection policies should go beyond mandated targets, and that carbon emissions should be measured and disclosed through the Carbon Disclosure Project (CDP).

Some felt that it was not clear how net zero for all its carbon emissions (beyond operational emissions) by 2045 will be achieved. Private businesses and water retailers informed us that a much clearer roadmap is needed to show how the ambitious goal will be reached.

The dWRMP24 highlights the climate change vulnerability posed by the 860 miles of coastline in the area. It was requested that more details should be provided about how the specific issues related to the coastal environment are integrated into decision-making.

6.19.5 Our response to comments on ‘climate change, carbon and net zero’

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 prepared embodied and operational carbon assessments for all feasible demand and supply options. These follow relevant UK Water Industry Research (UKWIR) guidance. The carbon assessments of the options will be a key input in our best value framework.

6.20 Growth

6.20.1 Customers

Customers are very concerned about the significant seasonal population growth and did not see this accounted for in the dWRMP24. There are general concerns about the scale of growth in some areas in our region, and that developers are still building houses without incorporating adequate grey water recycling or water efficiency measures.

Some customers expect us to be able to refuse development proposals until new reservoirs and infrastructure have been constructed.

6.20.2 Statutory organisations

Statutory consultees emphasised that future growth must not be allowed to threaten the integrity of Water Resource Zones. These organisations informed us that a risk and monitoring approach should be set out in the final WRMP.

It was highlighted that revisions of council Local Plans are expected, and these are likely to contain some significant development proposals looking to 2038. Responses highlighted that the needs for additional water resources should be flagged in the WRMP, especially in environmentally sensitive areas.

It was stated that options for new infrastructure development within designated sites must ensure full engagement is undertaken with all interested parties in a timely manner and that all statutory requirements including SEA and Habitats Regulations have been completed and permissions gained.

This group of respondents said that the cumulative impact of providing potable water and the capacity of water treatment plants for the proposed housing developments in each water catchment supply area needs modelling.

6.20.3 Non-statutory organisations

Opinion of these stakeholders is that there should be a commitment to work collaboratively with local planning authorities and developers to explore the potential for developments to be ‘water neutral’, especially in areas in serious water stress.

6.20.4 Private businesses and water retailers

These consultees believe that a position on water neutrality with detailed timelines and concrete plans for achieving a neutrality target should be developed and shared. They suggest that there could be collaborations with local authorities and developers to implement a water neutral development.

6.20.5 Our response to comments on ‘growth’

We do have some influence over the local planning process and are working with both household customers and stakeholders in key sectors such as developers and tourism to encourage the adoption of water efficiency measures. We work closely with local planning authorities to understand where growth and development is planned so that we can take the issues that have been raised into account and ensure we can meet the requirements of the development, customers and the environment.

6.21 Modelling

6.21.1 Statutory organisations

These stakeholders told us that the current water resource model cannot assess the full stochastic datasets to provide a deployable output assessment and it is disappointing that this technical capability has not been developed for WRMP24 given the future water resource challenges in the West Country.

Stochastic modelling is a requirement of the WRMP planning guidelines and that the rest of the industry has already developed this technical capability. Development of the capability is strongly encouraged by statutory organisations to fully test risk and uncertainty in the future water resource challenges.

6.21.2 Non-statutory organisations

One consultee suggested that the main challenge is the uncertainty in modelling demand reduction with the range of viable options.

6.21.3 Our response to comments on ‘modelling’

Our stochastic assessments are ongoing, and we will develop our models ahead of WRMP29 to enable us to complete a full assessment.

6.22 Best value, data and appraisal processes

6.22.1 Customers

Some customers felt it was difficult to determine whether the plan represents ‘best value’ for money for individuals/customers, communities, the environment, stakeholders or just for South West Water.

Those that responded said that the dWRMP24 should set out the targets will be achieved between 2030 – 2050 alongside the planned investments to determine if it provides best value. It is easier to monitor accountability for meeting targets, rather than amount of money spent.

6.22.2 Statutory organisations

The principle of a best value plan, where decisions are based not just on cost but consider other factors such as benefits to customers, the environment and society is supported. However, consultees felt that the strategic objectives and approach to the best value framework should explicitly refer to the built, cultural, and historic environment, not just the natural environment.

An appropriate number and range of options to meet water needs have been identified. However, statutory organisations said that robust, clear, detailed, accurate and complete evidence for the data tables is needed. The methodology and criteria used to screen options between unconstrained and feasible, and feasible and preferred, should be set out. Reasons for screening out options must be provided to give confidence that the programmes are best value for customers and the environment.

Consultees indicated that the final WRMP should set out why the preferred strategy was chosen by clearly showing the costs and water savings per price control period for each scenario. They also stated that a core pathway that includes evidence of 'low regret' investment to meet future uncertainties and allows for future flexibility must be included. There was a perception that the WRMP does not yet provide satisfactory evidence of either best value or a 'low regret' plan in the interest of customers and the environment.

One consultee felt that the explanations of the adaptive planning process and development of the core pathway does not adhere to the WRMP planning guidance. The adaptive plan for each resource zone sets out the additional investment required over and above the best value plan if 'extreme' and 'adverse' scenarios come to pass. However, they indicate that the core pathway is based on meeting 'benign' scenarios which does not align with the guideline's definition of low-regret investment and is not presented as part of the adaptive plan.

While two sets of scenarios have been used, consultees suggest that these do not align with the Ofwat scenarios or the six 'primary futures', and that it is unclear how the 'primary futures' have been used in the plan.

Feedback showed that decision-making processes are not clearly explained and further detail of the decision-making framework, including the proposed timings of investment, should be provided.

6.22.3 Non-statutory organisations

Consultees suggest that 'best value' is about investing now in new technologies and modern equipment as well as in nature-based solutions as this will save costs in the longer term. They also stated that best value should also include diversity and inclusion and ensure full representation of all communities, but it is not mentioned in the plan.

Non-statutory organisations commented that this should be explicitly mapped as part of a best value assessment. Water systems must be 'socially just' to ensure there is clean and plentiful water with access to and benefit from blue-green spaces for all.

Several stated that solutions should be co-created with stakeholder and customers to ensure they are sustainable and will protect and restore water environments. It will also engender ongoing community ownership and stewardship.

They also acknowledge that there are risks to achieving best value arising from a shift from hard engineering towards nature-based solutions, and that this will need a work force looking significantly different by 2035. Delivering true 'best value' means being ahead of the curve and co-designing, co-creating and co-delivering Future Water Visions today.

6.22.4 Private businesses and water retailers

There is general support for the methodology adopted and the current recommendations set out in the company's best value plan, including the commitment to provide resilient infrastructure, reducing operational and capital carbon impact costs, and supporting the long-term economic health of the region whilst meeting the challenges of climate change.

6.22.5 Consumer representatives

Feedback suggests that it is not clear what data has been used relating to the agriculture sector and the regulatory process for abstraction licences. This group of respondents told us that it is important that the sector understands the source of the data used, the modelling undertaken and accepts the information presented for its sector.

6.22.6 Our response to comments on ‘best value, data and appraisal processes’

The impact on customers' bills will be calculated for the alternative programmes considered in the appraisal that we undertake to identify our Best Value Plan.

We are working on increasing the level of detail that we include in our resubmitted dWRMP24. This will include 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. We look at all demand management options in terms of their costs and benefits and ensure that our initiatives deliver best value outcomes. Our WRMP is based on meeting these targets and we are exploring opportunities so that we can better / out-perform these. We will present a comprehensive summary of our decision-making process including the metrics we have used to assess our preferred pathway.

We will be providing a comprehensive discussion on our option screening process within our supply and demand options chapters as part of our revised dWRMP24.

6.23 Collaboration

6.23.1 Customers

Customers highlighted that it is important to engage with the established local environmental partnerships, rather than create new structures.

6.23.2 Statutory organisations

It was recognised that wide-ranging approaches such as survey and focus groups were used to engage customers, but respondents also stated that there should be more detail in the plan regarding how these approaches were carried out to ensure FAIR representation, and that there should be an explanation of how the outcomes from customer and stakeholder engagement have been used to influence decision making.

This group of respondents said that there was a notable lack of explanation regarding how different industries have been engaged.

6.23.3 Non-statutory organisations

Respondents emphasised that collaboration is essential to ensure goals and objectives can be aligned and options agreed. The dWRMP24 sets out how the preferred solutions have been identified and will be delivered in partnership with a range of stakeholders, including environmental NGOs. This approach is supported by non-statutory organisations.

6.23.4 Private businesses and water retailers

Consultees stated that there was an overall lack of clarity and specificity over how partnerships will be set up, run, and assessed. They also felt that there is significant scope for more intensive, targeted partnership work but feedback showed that we had not made clear how different stakeholders will be engaged and under what terms.

These respondents said that there needs to be more clarity on how the nearly 4,000 community groups will be engaged, whether this is even feasible, and the basis, aims for the engagement and the intended outcomes.

They suggest that the potential to work with collectives like the National Leak Research Centre, the Water Research Institute at the University of Cardiff, and the Environmental Change Institute at Oxford University should be explored.

6.23.5 Our response to comments on ‘collaboration’

One of the core principles of our dWRMP24 is co-creation with our stakeholders and wider community. However, realistically, it is not likely we will engage directly with 4,000 community groups across our region. Nevertheless, 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.

6.24 Funding and Costs

6.24.1 Customers

Some of our customers told us very clearly that they perceive their bills being used to pay shareholder dividends, executive bonuses and salaries rather than being invested in preventing and repairing leaks or in securing clean, safe water supplies for the future. Some think we should be renationalised. Some think shareholders should ‘take a responsible’ position and refuse dividends until all the issues have been resolved.

6.24.2 Statutory organisations

This group of stakeholders said that the costs and benefits of the least cost plan against the preferred and alternative plans should be presented, and the value of the additional benefit described where investment is required over and above least cost. Costings must be robust and should be used to inform PR24 business plan for funding decisions. There is no mention of how much the required investment will impact on the end user / householder bills. The impact of bill increases does not appear to have been tested with customers.

6.24.3 Our response to comments on ‘collaboration’

We will present a comprehensive summary of our decision-making process including the metrics we have used to assess our preferred pathway.

As we develop the dWRMP24, 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.

6.25 Communication and consultation processes

6.25.1 Customers

Some respondents think that there needs to be better communication and engagement with customers. They also state their belief that water customers need to understand that if they do not reduce their water use, then the impacts could be severe.

Others suggest that the Customer Summary document should be more concise. Their opinion was that the length discourages people from reading it. One felt that it was not clear, well summarised, informative or easy to follow. Feedback also told us that it lacked clearly laid out figures for the demand and supply baselines, it had an emphasis on protecting rivers and the environment which contradicts plans to continue to abstract water from the region’s rivers regardless of the environmental impact, and that some areas in the South West are not even mentioned.

6.25.2 Statutory organisations

Some stated their perception that customer engagement does not appear to have informed the policy drivers such as the acceptable level of resilience, environmental destination or the timing of investment.

6.25.3 Private businesses and water retailers

This group felt the summary documents provided a useful overview, but the main documents were largely challenging to review. They told us that the documents were too dense and formatted in a way that creates barriers to reading, undermining the quality and integrity of the whole consultation process.

6.25.4 Consumer representative bodies

Consultees approached of how the dWRMP24 sets out what has been learned through engaging with household and non-household customers as well as groups such as the Councils and Wildlife and Rivers Trusts in terms of customer views and priorities. They suggest that customer insight reports could be made available for interested parties.

The summary consultation document was commended for being clearly written with a logical flow of topics, explaining the targets and the experiences of 2022 drought for a non-technical audience with helpful use of graphics. Overall, the level of detail provided on how future demand has been calculated, and the options for household and non-household and leakage is good. The new UK Water Efficiency Strategy could be referenced, and readers should be signposted to water efficiency and water saving information.

6.25.5 Our response to comments on ‘communication and consultation processes’

We have followed the government's guidelines for the statutory public consultation of our dWRMP24. The complexity of the dWRMP24 has been raised by a few respondents to the consultation. We are working on restructuring the republished dWRMP24 to make it more accessible for all readers.

6.26 Other issues

6.26.1 Water transfers

Some customers have suggested that water transfer from water-rich regions of the UK, along the lines of the national grid, should be explored. They believe that the issue of future water supply is a national issue and should be looked at from a UK wide viewpoint by creating an integrated water network for a UK wide benefit. In times of shortages, it was suggested that water could be rerouted around the country, in the manner that electricity is distributed through the electrical national grid.

Other consultees suggest that grants should be available for such a large infrastructure project from a multitude of sources that would also provide many employment opportunities.

6.26.2 Boreholes

There is a proposal to consider recommissioning some boreholes. Feedback emphasised that assurance is needed that whatever led to the decommissioning of a borehole is no longer an issue.

6.26.3 Our response to comments on ‘communication and consultation processes’

We are currently looking to develop an integrated water supply in the South West by working with the Regional Water Resources Planning Group. Any water supplies from would undergo extensive tests by the DWI to ensure they are safe before being put into the distribution network.

7 Next Steps

We have considered the consultation responses received on our dWRMP24 and are updating our plan in line with the comments received.

Following the publication of this Statement of Response on 15 August 2023, we will:

- Complete our revised draft Water Resources Management Plan and publish this by 02 October 2023. Our revised draft plan will take account of:
 - Comments received from consultees, as set out in Section 3 and Appendix 1 and 2,
 - Revisions made following the consultation on the West Country Regional Plan,
 - Additional advice gathered from our regulators during a series of workshops and meetings following the consultation,
 - Changes that have occurred since publication of the draft plan, including the publication of the updated Water Resources Planning Guideline in April 2023.
- Continue to work closely with the West Country Water Resources Group (WCWRG) on the Regional Plan Statement of Response, which is due to be published in September 2023, and the Final Regional Plan due to be published in early 2024.

Following the publication of this Statement of Response and our revised draft plan, regulators will review these and provide advice to the Secretary of State for the Department for Environment, Food and Rural Affairs (Defra) who will decide whether our revised draft plan can become our final plan and be published.

We anticipate receiving permission to publish the final plan early in 2024.

Outputs from our revised plan will be included in our PR24 Business Plan, which will be submitted to Ofwat in October 2023. The determination of our PR24 Business Plan will inform our AMP8 delivery programme, starting in April 2025 and continuing to March 2030.

8 Our plans for further engagement

We recognise that effective and robust stakeholder engagement is a continual process, in which the long-term sustainability of the outcomes achieved is maintained through ongoing engagement activities. Considering this, we have also developed a long-term engagement strategy to ensure the long-term sustainability of the outcomes achieved during the pre-consultation phase and public consultation on our dWRMP24.

As we have for the dWRMP24, we are also fully committed to the co-production of the final WRMP with customers and stakeholders. To this end, many of the stakeholder conversations we have initiated will continue well beyond the publication of the final Plan in 2024. We remain open to new ideas, different approaches, evolution and challenge and will change our plans to reflect the input we receive.

SWW is also fully committed to the co-delivery of the WRMP with stakeholders. As we move towards our final plan, we will increasingly be discussing with stakeholders how we can build schemes together bringing contributions from different organisations to improve outcomes. As part of this, we will also be looking at further community funds and the opportunity to deliver planning gains through our investment.



South West
Water



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