

Addendum to the Statement of Response Published in October 2023



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We revised our Water Resources Management Plan (WRMP) following a 12 week public consultation in the spring of 2023. The revised WRMP takes into account all the comments and views received from our customers, stakeholders and regulators during the consultation.

We published the revised WRMP for a second, eight week consultation in October 2023, alongside a Statement of Response (SoR). Appendix 1 of the SoR sets out, line by line, how we addressed the comments received and where the changes made, to take them into account, are found in the revised WRMP documentation. Since publishing the SoR and following an internal review, we have found a number of omissions and errors in Appendix 1 that we wanted to address.

This Addendum to Appendix 1 of the SoR addresses the errors, clarifications and omissions and should be considered alongside the original Appendix 1. It is split into two sections:

- **Section 1 rectifies omissions from our published SoR.** We regret all the omissions, one of which we only received after the SoR had been published, and are taking this opportunity to apologise to individuals and organisations that expected to see their comments published but which were missing. All responses to the consultation are highly important to us as we want our WRMP to meet the expectations of our customers, stakeholders and regulators.
- **Section 2 sets out the errors in our response to the feedback.** We have copied the entire comment plus our response into the Addendum and shown the page of the error. We have used **red font to highlight** the amendments or clarifications made and used **strikethrough** to show any deletions. All other text is unchanged.

Addendum to Appendix 1: omissions

ID Reference: 044 Customer		
Feedback	South West Water Response	For more detail in our revised WRMP
<p>Are South West Water aware of the damage and subsequent water loss that occurs when they increase the water pressure (unannounced) from off season 3bar to holiday season 7bar? This happened at my property in Combe Martin on or around April 2nd 2023 when the pressure increase disconnected my mains supply in my property and poured water out for 13 hours at 7bar before being dealt with, as we were unaware overnight. If there is any way that this pressure increase could be incremental over a day or two to avoid sudden stress on pipes and joints this would save hundreds of thousands of litres of drinking water. It's not only an unnecessary waste but also incredibly damaging for the property and its contents. I know that I am not the only customer who has had this problem.</p>	<p>Thank you for reporting this to us. We are aware of the impact that sudden changes in water pressure can cause and will work to ensure this no longer takes place. We will pass your comments to our customer services team.</p>	<p>This has been passed to our Customer Service team.</p>

Feedback	South West Water Response	For more detail in our revised WRMP
<p>Collaboration between PCC/SWW is already taking place to good effect on a number of cross-cutting initiatives and projects such as Integrated Urban Drainage Modelling (IUDM) and ‘Green Minds’ projects. We should be building upon this to ensure the effectiveness of the WRMP proposals going forward and to identify opportunities to provide multiple benefits. Current existing partnerships and interactions with the Environment Agency should continue to add support to this going forward.</p>	<p>Thank you. The existing established partnerships and working groups will continue. Partnerships are vitally important to identify, co-create and co-deliver projects and work programmes that provide multiple benefits for our customers, communities and the environment.</p>	<p>Please see our Main Technical Summary for information about partnership working and Appendix 8 sets out in detail our approach to stakeholder engagement and the types of programmes we are currently involved with.</p> <p>Further collaboration and partnership working is discussed in Appendix 5, related to the development of new demand-management options / water saving initiatives.</p>
<p>There are a number of existing and new potential cross linkages into the PCC Local Flood Risk Management Strategy and SUDS policy in particular and these linkages should be explored. Surface water separation, CSO spill reduction and Bathing Water quality improvements should continue to be assessed and addressed going forward.</p>	<p>Our company’s Drainage and Wastewater Management plan (DWMP) considers flood risk and issues connected to drainage, CSOs, SUDS and Bathing Water quality. We are committed to working in partnerships with relevant organisations on all areas within our responsibility.</p>	<p>Please see more about our plans for addressing issues connected to drainage and wastewater management in our DWMP: Our DWMP</p>
<p>With regard to the management of water resources such as the SWW plan for demand reduction and leakage reduction, delivery needs to be coordinated with other PCC projects and works and the strategic network. Plymouth should be a priority area for proactive in-street leakage improvements to ensure that the infrastructure does not deteriorate critically. SWW should share information about the quality and state of repair about the pipe network.</p>	<p>We look forward to working with PCC on community initiatives designed to reduce consumer water use. Addressing leakage is an absolute priority in the next AMP to ensure we meet our targets and reduce losses from our network. Our WRMP sets out that we will prioritise leakage reduction according to risk. We intend to share data and information with all relevant parties so that we can jointly plan where and when infrastructure renewal takes place.</p>	<p>More information on reducing leakage and meeting government targets can be found in the Demand Forecast in Appendix 2 and our Main Technical Summary (Section 9): Our Demand Management Plan.</p>
<p>We have the following questions regarding future population and properties forecast and growth scenario infrastructure implication and it would be useful to hold a follow up meeting to discuss these questions but also to explore future data sharing processes and timescales re housing growth intelligence going forward:</p>	<p>Our forecasts of population and housing growth were produced by Experian, using data from the Office for National Statistics (ONS), Local Authorities and our own Developer Services team’s development database.</p> <p>We have also worked with local planning authorities across our region from planning application stage through</p>	<p>Appendix 2 provides information on the basis for our population and housing growth projections.</p> <p>Appendix 6 (section 7) provides more information on how we have considered uncertainty on future population growth,</p>

<p>What data was used for the plan based scenario approach? i.e. Housing Requirement in adopted plans or latest housing trajectories i.e. 2022 onwards?</p> <p>Does the plan identify infrastructure implications for the different scenarios? The plan based scenario suggests the highest level of development, does the management plan indicate what the infrastructure implications are for the highest development scenario i.e. location and land implications such as new or upgraded infrastructure?</p>	<p>to approvals to enable us to forecast and meet future demand.</p> <p>Our WRMP ensures that sufficient water is available to meet future growth under both adverse and benign “futures”. As part of our WRMP we consider how we move water around our zone and ensure sufficient interconnection is available. Required local infrastructure reinforcements are considered as part of our asset management activity and therefore do not form part of our WRMP considerations.</p>	<p>our adaptive pathways and scenario testing.</p>
<p>SWW should be much clearer about the specific projects and timescales that are going to deliver the higher level objectives of the plan.</p>	<p>We have clarified this information for specific projects including project plans and timescales in our revised WRMP.</p>	<p>Appendix 4 on Demand Options and Appendix 5 on Supply Options provide more details on the feasible options.</p> <p>Our Main Technical Summary, Section 9 and 10 sets out our preferred best value plan, and the timescales for implementation of the selected schemes and options</p>
<p>SWW must engage and collaborate on their opportunities for Biodiversity net gain with Local Authorities.</p>	<p>Thank you. Our recently published Biodiversity Strategy sets out our plans to work in partnerships to develop a biodiversity baseline across our holdings, ensure protection for existing habitats and species and to identify opportunities to use NBS to restore, enhance and increase the value of terrestrial, riverine and marine environments.</p>	<p>For more information, please see our recently published Biodiversity Strategy: Biodiversity Strategy</p>
<p>SWW have a crucial part to play in the adaptation to climate change space. We recommend for SWW to become an active participant in the Climate Impacts Group led by Devon, Cornwall and the Isles of Scilly in the development of its Regional Adaptation Strategy. The Collaboration also needs to happen in the Adaptation to Climate Change space and with regard to the Regional Adaptation Strategy work.</p>	<p>We are already an active members of the Climate Impacts Group and have fed into the Adaptation Strategy. We are also now collaborating with Devon and Cornwall councils in this area and recently agreed to participate in the Devon Climate Emergency Group. We would be keen to know of other areas where we can further participate. In addition, we are a key collaborator and active partner in the West Country Water Resources Group which considers the potential impact of climate change across our region and the adaptation measures that will be required.</p>	<p>Please see the West Country Water Resources Group website for more information about their work: https://www.wcwrg.org/</p>

Feedback	South West Water Response	For more detail in our revised WRMP
<p>We expect the company to provide sufficient and convincing evidence in its final WRMP to justify why its selected targets for demand reduction (leakage, PCC and business demand) represent the best value approach to meeting a supply-demand balance or delivering long term strategic outcomes. This should include evidence of target testing and a clear explanation of the company's decision-making process.</p>	<p>Our demand side strategy is designed to most efficiently meet our regulator-driven targets on leakage, PCC, DI and non-household consumption.</p> <p>Appendix 6 in our revised draft WRMP sets out our best-value methodology and how we have chosen our best value plan. We have an ongoing program of work to provide additional evidence to support this chapter that will be included in our Final WRMP.</p>	<p>See Appendix 6 for more information</p>
<p>As stated in our PR24 final methodology, we expect consistency between final WRMPs, company long-term delivery strategies and business plans at PR24. Any areas of variance between final (and published) planning frameworks and business plan submissions need to be fully explained, supported by compelling evidence. This should also include the reasons for changes and include confirmation that customers and the environment are not or will not be worse off.</p>	<p>Our PR24 plan, the company's long term delivery strategy and the revised draft WRMP are consistent. The work volumes and water-saving benefits are aligned, however the business has set its efficiency targets as part of the Price Control, therefore the expenditure included in the PR24 tables vs WRMP tables will be different.</p>	<p>N/A</p>
<p>In addition to the changes across the supply demand balance raised above, the 2022 drought highlighted concern that Colliford WRZ did not demonstrate the level of resilience expected in such an event, and some use restrictions remain in place. South West Water has set out interventions in its draft WRMP to improve the robustness of Colliford resilience, and maintain Colliford storage throughout 2023 due to the risk of repeat low drawdown events. We encourage South West Water to continue to closely monitor the situation throughout 2023, including setting out further detail on how the company can react earlier to drought risks. South West Water has also set out options in the draft plan which it states may be incorporated into the final plan either in the current baseline, as best value options for WRMP24, or drought options in the final plan. We expect the final WRMP to clearly set out how the preferred plan for Colliford has incorporated these options, and demonstrate that the stated resilience and level of service for restrictions in Colliford is robust and correct. The final plan should clearly differentiate between these activities that maintain current and expected levels of resilience and levels of service in the baseline, versus enhancement activities to meet WRMP24 requirements, to give us confidence that customers are not funding activities that should be included in base funding.</p>	<p>Our revised WRMP builds from a base position and identifies further demand and supply options as part of our Best Value Plan to meet regulatory demand targets and maintain a positive supply-demand balance.</p> <p>In Appendix 1, section 2.2, of our revised draft WRMP we have outlined the AMP7 schemes in the process of delivery that form part of our baseline position in 2025 at the start of AMP8.</p> <p>In Appendix 2, page 28 / 29, we have outlined the AMP7 activities that have formed part of our demand baseline position.</p> <p>Some of these schemes and interventions are part of recovery and resilience response to the 2022 drought, others have different drivers and were already planned.</p>	<p>See Appendix 1 (Supply Forecast) and Appendix 2 (Demand Forecast) for more information.</p>

Addendum to Appendix 1: Errors and Clarifications

PAGE 12 (WASTEWATER MANAGEMENT AND SEWAGE RELEASES)

ID References: 004, 010, 015, 027, 036, 037, 038, 041, 043, 073, 074, 075, 076

Wastewater management and sewage releases

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

ID References: 004, 013, 021, 023, 039, 071, 080

Impact of Tourism

Feedback	South West Water Response	For more detail in our revised WRMP
<p>Our population grows from 560,000 to 3 million during the summer months, and yet there is no allowance for such a demographic shift by South West Water. There is sufficient circumstantial evidence that water consumption is far higher amongst short-stay tourists than amongst permanent residents. They are on holiday and if they want excessive showers and luxurious baths in their rentals, they will. Hot tubs are emptied and refilled. You need to get the water efficiency message out to the holiday maker, big time, with posters and notices everywhere they go. Consider a way to fine or charge more to over-users. There is a crisis in Cornwall and this must be taken seriously but holiday makers in particular feel that its not their problem. Don't give priority to tourists. Locals are far more important.</p>	<p>Many of our customers have expressed similar thoughts. We do undertake targeted visits to holiday homes and tourist accommodation to discuss water efficiency issues and we have a programme of installing smart water meters across our region in all properties. However, making visitors to the region reduce their water use and / or contribute more financially is not an issue we can directly influence.</p> <p>Having said this, we have a broad range of water efficiency options in our updated dWRMP24 and we are actively working with holiday parks, and other tourism businesses piloting and implementing water efficiency measures.</p>	<p>Please see Appendix 5 for information on our water efficiency options and future collaboration and partnership work within the tourism sector.</p> <p>Please also see Section 9 (Our Demand Management Plan) in our main Technical Summary for more information.</p>

ID References: 003, 018, 042, 068, 072, 073, 077, 080		Leakage
Feedback	South West Water Response	For more detail in our revised WRMP
<p>Don't preach about saving water until you are leak free. The size of leakage eclipses all other pressures including population, growth in demand and climate change. Why produce drinking quality water only for it to escape in leaks? You have consistently failed to repair leaks or improve the infrastructure. At the very least this requires public apology and acceptance you have failed, coupled with a detailed scalable plan of how you will correct your failure. It is beyond doubt that a step change in leakage reduction should be a major focus for the future.</p>	<p>We are investing over £50 million in our leakage recovery plan to help us achieve a minimum of a 16% reduction during AMP7 (2020 - 2025). Our WRMP sets out our goals for building on the leakage reduction programme by ensuring we meet our revised leakage targets of 30% by March 2032. We have set out a comprehensive suite of demand management measures in the revised Demand Strategy section of our updated dWRMP24.</p>	<p>Please see section 9.2 (Leakage) in our main Technical Summary for more information.</p>

ID References: 017, 033, 051, 052, 055,061,064		Environment
Feedback	South West Water Response	For more detail in our revised WRMP
<p>You should be adopting a more enterprising approach to protecting the environment and comprehensively enhancing the land to make a major contribution to rewilding, increasing oxygen and reducing carbon dioxide levels. Dartmoor Forest should be reforested with oak, hawthorn and other native deciduous trees. Devon has miles of grass fields dominating the landscape. This is a major undertaking but you could make a significant difference to climate change if you approached it at scale. Reforestation should be an essential part of the Plan. Unsustainable volumes of water is taken from our rivers and lakes and the WRMP is proposing to increase how much water it takes. This will have devastating impacts on habitats and wildlife, and particularly on migratory fish. You need to ensure abstractions don't result in catastrophe for river health.</p>	<p>Thank you. We probably own much less land than you think, but we collaborate closely with the catchment partnerships which have members comprising landowners, farmers and the Wildlife and Rivers Trusts. We also have a comprehensive environmental protection and enhancement programme and part-fund the catchment partnerships to co-create and co-deliver shared schemes including peat, woodland, river and countryside restoration. Each and every abstraction licence is agreed with and set by the Environmental Agency to ensure abstractions remain sustainable and can maintain the health of the riverine environment. We must always comply with our licences. Protecting sensitive and environmentally designated sites is of vital importance which is why we are proposing abstraction capping in such sites.</p>	<p>More information on our abstraction licences and the work we do in partnership schemes to protect and enhance the environment is found here: environment</p>

ID Reference: 082 Environment Agency

Feedback	South West Water Response	For more detail in our revised WRMP
<p>South West Water has outlined that one of its options is to build a new raw water intake on the lower river Camel. This has a benefit of 5Ml/d. We have significant concerns with this D9 option as river Camel SAC extends all the way down the river to just upstream of Wadebridge. CSMG flow targets also apply to the river Camel. In addition, the new intake would require infrastructure (weir) which would be required to facilitate the abstraction. River Camel Restoration Plan is aiming to remove barriers from the catchment. South West Water needs to undertake detailed modelling for this option. We also need to have further discussions with the company to understand its acceptability. The company also need to consider the infrastructure (weir) which would be required to facilitate the abstraction and how this fits in with the River Camel Restoration Plan.</p>	<p>We acknowledge your concerns about this supply option and have reviewed all of our supply options. We are keen to meet with you to discuss the specific aspects you have raised about it.</p> <p>We screened out our River Camel COL2 option at the post-feasible options stage due to the fact that we need more time to develop the option through feasibility studies in order to determine whether we can demonstrate a long-term sustainable abstraction from the source. This means that the option is not on our constrained list of supply options and so has not been considered in our modelling for WRMP24. We will continue developing this option and engage with our stakeholders on the outputs of any feasibility work we undertake.</p>	<p>Please see Appendix 4.</p>

ID Reference: 082 Environment Agency		
Feedback	South West Water Response	For more detail in our revised WRMP
<p>Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) require protected sites that are in unfavourable condition to have solutions implemented “as soon as practicable”. We interpret this to mean implementation works should begin in the AMP period following completion of an investigation. However, the plan has not demonstrated that this requirement will be met for the River Avon SAC. The plan indicates delivery will be from 2030-2045 but this timing is not explained and therefore the plan cannot be considered to have justified delivery of the solutions being pushed back to the later part of the planning period. The adaptive plan for Bournemouth includes a preparation and monitoring phase. The wording implies that further investigations are required into the scale of the change required before the company begins implementing a solution for the River Avon SAC. Our interpretation of the information in the plan is that this adaptive approach would not meet the requirements of the habitats regulations because it appears to introduce around 5 years of delay before implementation works begin. The plan refers to the abstraction reductions for the River Avon SAC as “suggested as required”. This mischaracterises the status of these abstraction reductions which we would describe as confirmed. We do not agree that these reductions require further scrutiny due to the length of river benefitting because these reductions are not subject to cost benefit or affordability tests under the Habitats Regulations. These abstraction reductions are legally binding and should have been included in the core pathway. The company must demonstrate that the WRMP will deliver the requirements of the Conservation of Habitats and Species Regulations 2017 by planning to reduce abstraction to meet the requirements as soon as practicable. The timings of solutions should be optimised to ensure delivery of these requirements is not delayed, and any works that facilitate achievement of these requirements are completed on the quickest technically feasible timescale. The final plan should clearly state which solutions will contribute to resolving the impact on the Avon SAC. This should include demonstrating that timings of SROs are planned to meet the above requirements as soon as practicable. The plan must demonstrate that the adaptive approach for Bournemouth, including additional monitoring and adaptive planning decision points, does not introduce a delay in implementation of solutions for the River Avon SAC. Further investigative work should be targeted at delivering the best solutions for the River Avon SAC.</p>	<p>Thank you for these comments. Once further investigations are completed, we will ensure the findings will be reflected in an update of the HRA to account for any identified likely significant effects, which will subsequently feed into the SEA assessments of the options.</p> <p>We have outlined the solutions that are required.</p> <p>We have to delay the Environmental-Destination abstraction reduction profile because our options can’t meet anything earlier. Residual risk remains here because we’re having to delay. We are doing everything as fast as practicably possible and state our commitment for more options-scoping ahead of WRMP29.</p>	<p>Please see Appendix 7 for our Strategic Environmental Assessment.</p> <p>See Table 41 of the Technical Summary.</p>

ID Reference: 082 Environment Agency		
Feedback	South West Water Response	For more detail in our revised WRMP
<p>The plan does not contain the methodology or assumptions in relation to the risk of temporary use restrictions, drought orders and emergency drought orders. It also has not outlined the approach it has adopted to show it can meet the frequency that the company has stated in its plan. Therefore, the company has failed this direction. In addition, the company does not present the company's actual levels of service. The company must provide the methodology and assumptions it has used to calculate the annual probability of temporary water use restrictions, ordinary drought orders and emergency drought orders. The company must include assumptions about the severity of drought it has used, and the methodology must refer to both the annual percentage of risk over the 25 years and the changes over the 25-year period. The company should report on the method it has used to confirm that it can comply with the more frequent drought measures (L1- L3). The company should justify any significant reduction in deployable output as a consequence of including the frequency as a constraint or outline how it intends to minimise the reduction. The company should outline its actual level of service.</p>	<p>We developed further information on our assumptions for TUBs and Drought and Emergency Drought Orders. We have provided additional details on how these affect the risk of restrictions in our final plan. We are additionally considering methods to quantify future risk.</p>	<p>See section 3 of Appendix 9 (Lessons from the 2022 Drought) for details of the update to our Drought Plan</p>

ID Reference: 082 Environment Agency

Feedback	South West Water Response	For more detail in our revised WRMP
<p>The company has not set out the number of meters that are not charged by reference to volume, in other words shadow metering, that have been fitted at the commencement of the planning period. Therefore, the company has failed this direction. The company must clearly state whether it will have fitted any meters that that are not charged by reference to volume, in other words shadow metering, by the commencement of the planning period.</p>	<p>We have included a narrative in our Demand baseline that clarifies the number of household meters not charged by volume (shadow meters). The values used in our final plan values are the same as our baseline.</p> <p>All meters, irrespective of their charging basis, have been included in the data reported in the WRMP tables.</p>	<p>Please see section 4 on demand in our Technical Summary Appendix 2, section 1.9.2</p>

ID Reference: 082 Environment Agency		
Feedback	South West Water Response	For more detail in our revised WRMP
The outage report states that a "full listing of all data provided to AECOM is attached to this report" but this has not been provided in the company's plan. If the report references data, it should be provided.	The AECOM outage report has been updated and is reflected in the revised draft WRMP .	For more information, please see Appendix 7.1 Appendix 1, section 7.1 & 7.2
It is unclear if the outage analysis has been undertaken using the source works output data and reservoir storage levels for a four-year period 2017-2021, or just the period April 2020 to the end of March 2021. In either case this is a very short record. Given that a similar approach to outage was adopted in two previous plans the data generated for those assessments should have been used. Provide clarity over the data and time period used in the analysis. The outage data from previous planning rounds should be used in the analysis. The outage data is not of sufficient quality to support the company's outage allowance assessment, and the company should provide a detailed action plan to show how it will rectify this.	We have reviewed our risk of outage and we consider its impact on our plan as relatively low. However, we will complete a full review for the WRMP29.	For more information, please see Appendix 1, section 7.1: section 2.1
<p>There is no explanation why the 95th percentile probability was chosen or what probability distributions were used. The approach to the probability and distribution selection should be explained with reference to the Risk Based planning guidance.</p> <p>The outage values remain constant through the planning period even though the WAFU decreases by approximately 9%. The company should explain why the outage allowance does not change through the planning period.</p>	We have explained this in the revised draft WRMP .	For more information, please see Appendix 1, section 7.1: Section 7.2

PAGE 46 (ENVIRONMENT AGENCY)

ID Reference: 082 Environment Agency		
Feedback	South West Water Response	For more detail in our revised WRMP
<p>In South West Water’s forecast of new build properties, there is an unusual uptrend in the new properties forecast figure from 2046. Between 2020 and 2046 South West Water forecasts a decreasing trend of new build properties, but from 2046 there is a sudden increase and plateau. This sudden change has not been explained. South West Water should review its new build property forecast and ensure it is accurate. The company should justify the sudden change in new build properties from 2046.</p>	<p>We have provided further explanation in our revised demand forecast commentary. In our previous draft plan we used trend-based property forecasts which showed the sudden increase and plateau. In our revised draft submission we used plan-based property forecasts, in accordance with the WRPG guidelines, which do not show the same profile. This can be seen on page 13 of our Appendix 2 Demand forecasting.</p>	<p>Please see section 4 (Demand Forecast) in our main Technical Summary and Appendix 2 for more information.</p>

PAGE 54 (ENVIRONMENT AGENCY)

ID Reference: 082 Environment Agency		
Feedback	South West Water Response	For more detail in our revised WRMP
<p>There are a number of feasible supply-side options that have not been included in the supply side modelling. For example:</p> <ul style="list-style-type: none"> · COL3 - Abstraction of Colliford compensation flows when making supply releases · COL4 - Abstraction of Siblyback compensation flows when making supply releases. <p>These options require a change to the existing abstraction licenses for proper implementation. The company should include all feasible options in its supply-side modelling. This should be done for the revised draft plan.</p>	<p>Thank you for your comments. These are included in the resubmitted draft WRMP24. In table 14 on page 43 (Appendix 4, section 5.11) we explain why COL3 and COL4 feasible options were screened out at this stage.</p>	<p>Please see Appendix 4.3</p>

ID Reference: Natural England
067

Feedback	South West Water Response	For more detail in our revised WRMP
<p>Species obligations and newer obligations from the Environmental Improvement Plan should also be included within the Environmental Destination.</p>	<p>We hope we have addressed this in our revised draft WRMP.</p> <p>Our Environmental Destination follows EA guidance. We have worked with local EA to agree the abstraction sensitivity bands which were used in the assessment which set how much water we need to protect for the environment. The EA set these bands based on the species and environmental sensitivity of a particular river.</p>	<p>Please see section 5.4 in the Technical Summary and Section 4 of Appendix 1</p>

ID Reference: Natural England 067		
Feedback	South West Water Response	For more detail in our revised WRMP
<p>The HRA describes the new Gatherley option as the upgrade and dualling of the existing raw water trunk main between Roadford reservoir and the River Lyd. It is noted as a key option and is included in the Adaptive Strategy. Currently, the draft HRA screening only considers some downstream impacts from the option, and concludes that the new intake will result in no likely significant effects on the integrity of either Plymouth Sound and Estuaries SAC or the Tamar Estuaries Complex SPA. It is the opinion of Natural England that there is insufficient evidence presented within the HRA to support this conclusion and that no in-combination or cumulative assessment has been conducted. We note that no assessment has been made on the implications of reduced flow to migratory fish. Formal assessment should also consider the potential implications from future asset changes downstream (Gunnislake), which may increase the upstream habitat reach for migratory fish. We additionally advise that Dartmoor SAC should be screened into the HRA in relation to this option. Atlantic Salmon is a feature of Dartmoor SAC, which in part uses the River Tamar to migrate upstream, something which has not been identified within the HRA screening for this option. The potential for increased abstraction to impact on the freshwater dependent features of Dartmoor SAC should also be considered.</p>	<p>As part of the planning application for the new Gatherley scheme, an EIA screening, which includes HRA, has been produced for consultation. Also, as part of the new abstraction licence application, detailed hydrological modelling has been completed which will be included in the EIR. We will ensure that our SEA contractor (Mott Macdonald) will have this up to date information for the WRMP.</p> <p>The current planning application for Gatherley is for the delivery of the Green Recovery Initiative – Gatherley Phase 1. This is not the option included in the WRMP (ROA15 Gatherley Phase 2). The Gatherley phase 1 scheme has received a negative EIA screening result and the planning application is being progressed. The abstraction licence application is following the requirements set by the Environment Agency and specific queries are being discussed with them during the pre-application process. We will ensure that our SEA contractor (Mott Macdonald) will have this up to date information for the final WRMP.</p>	<p>Please see Appendix 4.1 and Appendix 4.2</p>

ID Reference: 058 Ofwat

Feedback	South West Water Response	For more detail in our revised WRMP
<p>The choice of meter technology and the reasoning, based on the programme level costs and benefits, needs to be clearly explained with sufficient and convincing evidence in the final WRMP. Although different timescales for meter rollout are assessed, it is unclear which delivery profile is selected and the reasons why. This also includes how the metering strategy aligns and supports the selection of PCC and leakage profiles for which there is expected to be significant interactions.</p>	<p>We have developed a comprehensive range of meter options. These cover the full range of selective metering options (Optants, change of occupancy, dual billing, compulsory) and a range of meter-upgrade options over differing timescales. The option summaries set out the contribution that each metering option makes to both consumption and leakage savings. We have set out, as part of our decision-making process, why the chosen metering strategy is "best value".</p>	<p>For more information, please see Appendix 5 and 5.1 which contain for a comprehensive summary of all metering options.</p> <p>Also see Appendix 6: Best Value Planning Approach and Methodology</p>

ID Reference: 058 Ofwat		
Feedback	South West Water Response	For more detail in our revised WRMP
<p>The key changes to the planning problem are described; Increased drought resilience and climate change are key drivers of investment for this plan. South West Water should provide assurance in its final WRMP that abstraction reductions are not double counted when licence capping is combined with environmental destination scenarios.</p>	<p>We have included licence capping and environmental destination scenarios and we will ensure that our abstraction reductions are not double counted.</p> <p>There is no double accounting. Page 21 of Appendix 1 includes specific reference to this and a table which outlines our assumptions per licence.</p>	<p>Please see section 5.3.1: planning scenarios) and section 5.4.1: sustainability abstraction reductions and WINEP scenarios in our main Technical Summary for more information. Please see page 21 of Appendix 1.</p>

ID Reference: 058 Ofwat

Feedback	South West Water Response	For more detail in our revised WRMP
<p>The company has included an assessment of its WRZ integrity. The company states that improvements were made to the distribution system of its Roadford WRZ during the 2022 drought, which restored the current integrity of the zone. The company states that this needs to be monitored to ensure that future growth doesn't threaten the WRZ integrity in the future. We expect the risks and monitoring approach to be set out in the final WRMP.</p>	<p>We have presented a reassessment of our target headroom in our revised draft submission.</p>	<p>Please see section 6: our supply demand baseline in our main Technical Summary for more information and Appendix 3.</p>
<p>The company's headroom allowance is high compared to most other companies, being an average of 9.7% of the company distribution input (demand) during 2025-30. Therefore, this planning assumption contributes significantly to the company supply-demand balance and proposal for investment. In its final plan, the company should present sufficient and convincing evidence that the headroom allowance is appropriate in both the short and long term, is not driving unnecessary and high regret investment, and that it has properly accounted for interactions with adaptive planning.</p>	<p>We have presented a reassessment of our target headroom in our revised draft submission.</p>	<p>Please see section 6: our supply demand baseline in our main Technical Summary for more information and Appendix 3.</p>

PAGE 91 (DEVON WILDLIFE TRUST)

ID Reference: 060 Devon Wildlife Trust		
Feedback	South West Water Response	For more detail in our revised WRMP
We are pleased to see recovering, recycling water and diversifying water supply within the plans. All should be subject to appropriate environmental and biodiversity assessments before plans are finalised. Suitable environmental monitoring programmes should be put in place.	We will be undertaking comprehensive assessments for each of our supply options and engaging with stakeholders before any options are developed and implemented. Environmental Assessment and SEA are part of the Best Value Plan methodology in Appendix 6.	Please see Appendix 5 Appendix 4 on our Supply Options .

PAGE 105 (WOODLAND TRUST)

ID Reference: 070 Woodland Trust		
Feedback	South West Water Response	For more detail in our revised WRMP
We fully understand the need to supply water to people however, the installation of new facilities and provision of water could have a detrimental impact on the environment if not managed well.	We agree. All proposed schemes will undergo a full Strategic Environmental Assessment as an essential element of developing the proposal and this takes multiple factors into account including positive and negative societal, economic, cultural and environmental impacts. A full Environmental Assessment (Strategic Environment Assessment) form part of Best Value Plan methodology discussed in Appendix 6.	Please see Appendix 6 to see how we have evaluated the options to arrive at our Best Value Plan.

ID Reference: 009 Everflow		
Feedback	South West Water Response	For more detail in our revised WRMP
<p>Business (NHH) customers use around 30% of water supplies, but water efficiency work has focused heavily on reducing household use. We would like to understand how the 9% demand reduction target for NHH will be applied in practice with more details about NHH smart metering and water efficiency plans. Business customers' involvement is essential to meeting the demand reduction targets, but NHH have low awareness of water scarcity threats and how this could affect their businesses. Business customers and employers are in a prime position to influence their employees' behaviour.</p>	<p>We have developed a range of NHH options, including smart meter upgrades, and have assessed the optimum best value options as part of our revised WRMP24.</p> <p>We haven undertaken further engagement with retailers and business customers as part of our PR24 consultation activity and have used this feedback to shape our plan-choices.</p>	<p>Please see Appendix 2 Appendix 5.1 for detailed information on the NHH options considered. Refer to Section 9: our demand management plan, in the <i>Main Technical Summary</i> for details of our best-value plan.</p>

ID Reference: 065 ESP Water Limited

Feedback	South West Water Response	For more detail in our revised WRMP
<p>ESP Water Limited is a new NAV (New appointment and Variation company) and we have been granted variations to our appointment to become the Water and Sewerage Undertaker to new housing developments in this region. We are also growing fast and expect to have further sites soon. We are very supportive of this regional plan and the collaboration undertaken with many stakeholders in the region, but it is not evident if you have worked with NAV companies. We recognise that the supply and demand calculations have included these sites, as future housing developments have been included in the planning, but if demand management measures are not undertaken here then this will impact the incumbent companies’ targets. As the NAV market is growing rapidly and the size of the sites increasing, we feel the contribution by NAV companies should be considered in this plan.</p>	<p>At the time of collating this plan there were no NAVs providing potable water supply to customers in our supply area, so consultation was not required. In recent months, 33 NAV connections have been added to our billing files and we have contacted the NAV’s active in our area to let them know about the WRMP consultation. We shall record demand data as a potable export from 2023/24 onwards.</p> <p>Our preferred demand management plan (Section 9 of Main Technical Summary) discusses the water efficiency initiatives we are planning to implement; this includes water efficiency visits, metering, rainwater harvesting, together with plans to pilot and develop wider partnerships with developers and retailers. (our future collaboration on demand management options is set out in Appendix 5). We welcome the opportunity to collaborate with NAVs as part of future collaboration.</p>	<p>Section 5.3 in Appendix 2 discusses NAVs.</p> <p>Section 9 of our Main Technical Chapter provides detail on our preferred demand management strategy.</p> <p>Section 5, sets out the future pilots and collaboration planned for future demand management activities.</p>



South West
Water



Bournemouth
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