South West Water

Appendix

Second Consultation feedback and our responses

January 2024

Contents

1. Customers

ID Reference: C1		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
A short perusal of the revised plan shows a lack of understanding between water resources and the movement of treated water via a strategic grid, the bone of which can be glimpsed in the diagrams. Using a strong blue arrow in the diagram for both purposes demonstrates the lack of clear thinking in SWW's plan. Moving treated water about is not a resources issue and the links illustrated do not make up a strategic grid.	The diagram on page 7 of our Main Technical Report does show a single blue line for both raw and treated (potable) transfers. This is a highly simplified diagram as we do differentiate between raw and potable water when considering transfers. For more detail, please see our supply options in Appendix 4. Further, our WRMP has been developed in close collaboration with the West Country Water Resource Group (WCWRG) Regional Plan. The WCWRG Regional Plan considers opportunities for water transfer schemes (raw and potable) across the region, and across company boundaries, to provide benefits to our customers and those of our neighbouring water companies.	For more information please see section 3.4 of the Main Technical Report and Appendix 4: Supply Options. See here for more information on the WCWRG.
The second major issue is the lack of clear thinking in what is required for the region - not just SWW. The water companies in the SW should work together and they need a raw water grid to provide local and mutual support. Thus, the plan should have included raw water links between Mendip Quarries, Clatworthy, Chew 2, Blagdon, Wimbleball, Roadford and Colliford. This lack of joined-up thinking illustrates why the water companies of the SW should be amalgamated for the benefit of both customers and shareholders.	In section 3 of our Main Technical Report, we have explained that we work closely with, and are a core Member of, the West Country Water Resources Group. This was established in 2017 to allow improved collaboration in water resources management in South West England. Other Members include the Environment Agency, Natural England, consumer representative bodies as well as the other water companies in the South West. Together, we support a coordinated approach to water resources planning to balance water supply with demand through a common regional understanding of the challenges in the West Country. We are also working closely with RAPID, the Regulators Alliance for Progressing Infrastructure Development, to accelerate the delivery of schemes that will benefit all water users, communities and the environment in the West Country.	For more information please see Main Technical Report - Section 3: Setting the Scene
If the SW suffers another drought like that of 2022, it will need additional short-term resources. There has been no mention of taking water from the Somerset Levels in such times.	Understanding the risks and issues arising from climate change, particularly the increasing pressures on our water supplies, are key aspects of our WRMP. These challenges and all potential solutions have been explored and are discussed in section 3 of our Main Technical Report. We continue to work with all our partners and regulators to improve our understanding of how the challenges we face might impact water supply and the environment both now and in the future. Our WRMP includes a rigorous forecast of future water supply to ensure we comply with our statutory duty to meet the	For more information please see Appendix 9: Lessons From 2022 Drought

	demand for water while also achieving sustainable abstraction that protects and improves the environment. Our role in maintaining a resilient water supply for our customers whilst maintaining sustainable levels of abstraction from our water sources is discussed in Section 5 of our Main Technical Report and supported by Appendix 1: Supply Forecast.	

ID Reference: C9		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Firstly, replacing complete existing water supply pipes instead of replacing sections when leaks regularly occur would save a lot of wasted water. How much water is lost through leakage each year in the South West??? A fifth of the public water supply is lost through leaks in the network, according to the government's "plan for water", which was released in April, part of its attempts to achieve cleaner and more plentiful supplies in the UK	Controlling leakage is an essential part of our Demand Management Plan. We are required by our regulators to achieve targets of a 50% reduction in leakage from a 2017/18 baseline by 2050, with interim targets of 20% by March 2027 and 30% by March 2031. We have assessed a range of leakage options, from repairing and replacing mains, communication pipes, to undertaking pressure management and implementing higher levels of monitoring to detect and target repairs. Further information is available in Annex 5.2, available upon request, and Appendix 6.1. Please also see section 9.1 of our Main Report for details of our selected best value leakage strategy.	Please see section 9.1 of our Main Technical Report.
Last November, the regulator said it was delaying a decision on whether South West Water was moving towards meeting its own targets on reducing leaks, as it tried to understand how the business had calculated its performance figures. Ofwat said it would conduct a "thorough investigation" into South West Water, which supplies customers in Cornwall and Devon, as well as parts of Dorset and Somerset. We need to be confident that all studies undertaken are sufficiently comprehensive and that the full results will be made public. We need to know how they plan to act on the studies and how the results will be monitored.	We transparently publish this information on an annual basis in the financial section of our Annual Report. The last report published was for 2022 – 2023.	Our Annual Report for 2022 – 2023 is available at: how-we-are-performing

ID Reference: C10		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
My primary concerns are that all impact studies undertaken are sufficiently comprehensive and that there is full disclosure of results to	We have undertaken a full Strategic Environmental Assessment of our WRMP. Please see Appendix 7.	Please see Appendix 7.

the public domain that detail plans of any resultant actions in terms of further studies or monitoring		

ID Reference: C13		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
This re-consultation and the revised version of the dWRMP still does not provide enough information to enable proper responses to be made, the consultation is inadequate and is not a sound basis for the approval of the Plan.	We have endeavoured to engage fully and openly with all our customers and other stakeholders in developing this WRMP. Feedback from customers and stakeholders is the principle reason why we fully revised our initial draft WRMP following our first consultation in February 2023 and then consulted again on our revised draft in October 2023. Details of the ways we engaged with customers and other stakeholders is given in section 3.5 of our Main Technical Report, supported by Appendix 8.	For more information please see Appendix 8: Stakeholder and Customer Engagement
On the basis of the information that has been provided, the current revision of the dWRMP fails to adequately protect rivers and lakes in the South West, and does not appear to comply with the 2017 Regulations.	Protecting the environment is central to our WRMP and the challenges that we face, see section 3 of our Main Technical Report. Our plan is supported by a Strategic Environmental Assessment, see Appendix 7.	For more information please see our Main Technical Report.
I would request that South West Water publishes an updated revised dWRMP before the release of its WRMP24. This plan should provide transparent evidence that South West Water is appropriately managing its water resources and is developing adequate protection for the waterbodies in the South West.	Our decision making process is explained in section 8 of our Main Technical Report and we have assessed a range of options to develop our Best Value Plan. Our Demand Management Plan is explained in section 9 of our Main Technical Report and our Water Supply Plan is in section 10. Full details of our Best Value Methodology and further information on the alternative plans assessed and why our selected plan is best value will be included in Appendix 6, in a further revised draft due for publication in 2024.	For more information please see Appendix 6: Best Value Methodology
South West Water's current plan failed to manage the conditions experienced in the South West in 2022. Over this consultaion period, stakeholders and regulators must press South West Water into producing a new comprehensive plan to guarantee its plan never fails again. Rivers and lakes in the South West need plenty of water to support healthy populations of salmon, trout and other wildlife. This will only be possible with effective water resource management.	Understanding the risks and issues arising from drought and climate change, particularly the increasing pressures on our water supplies, are key aspects of our WRMP. These challenges are discussed in section 3 of our Main Technical Report. Our role in maintaining a resilient water supply for our customers whilst maintaining sustainable levels of abstraction from our water sources is discussed in Section 5 and supported by Appendix 1: Supply Forecast. Our drought plans, along with our response to the 2022 Drought, are discussed in Appendix 9, Lessons from the 2022 Drought.	For more information please see Appendix 9: Lessons From the 2022 Drought

ID Reference: C18		
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
The plan fails to deliver a management strategy that will allow you to cease your over-abstraction as soon as practicable. An end date is not provided and it is opaque and confused at best.	We take uncertainty into account for a number of future scenarios using an adaptive planning approach to our decision making. This is explained further in section 8.7 of our Main Technical Report. Our decision making process must balance a wide range of factors including affordability, deliverability, regulatory requirements, environmental impacts and benefits, net-zero ambitions including consideration of the "value" our stakeholders and customers asign to mitigating these aspects. We have selected an ambitious demand strategy, that relies on delivering higher levels of leakage than required by the government's 50% reduction targets, installing smart meters as fast as is deliverable, and carrying out significant water-efficiency and customer behavioural-change programmes. This decision making process is discussed in Appendix 6 in more detail. We will provide further information on the alternative supply and demand strategies assessed and why our selected plan is best value in a further revised draft due for publication in 2024.	For more information please see our Main Technical Report, Section 8: Decision Making Process
You have not and do not have interest in protecting the natural environment. You could change this if you wanted but profits trump everything else.	Protecting the environment is central to our WRMP and the challenges that we face, please see section 3 of our Main Technical Report. Our plan is supported by a Strategic Environmental Assessment, see Appendix 7. Appendix 6 explains our decision making process and explains how we have balanced a range of factors including the primary considerations of affordability, deliverability, the environment, carbon emissions and achieving our net-zero ambitions.	For more information, please see the SEA, Appendix 7
You are marking your own homework and receiving government bonuses. You have everything wrong. Take the profits and government bonuses you've been making for years and use ALL of it to fix the problems you created in the first place.	Each year, our annual spend totals around £900m. Of this, around £700m comes from the money we collect from customers and approximately 50% of this total revenue is invested in our infrastructure and assets, and day-to-day running costs. Day-to-day running costs include maintenance costs related to our network and treatment works, chemical costs for water treatment, and other operational costs. A further ~34% of this is spent on paying our taxes (11%), paying our staff (13%) and paying for the power we use (10%). These are all considerable outgoings. Only 8% of our revenue each year goes towards paying dividends (limited to £12m last year).	We report on all financial activites in our Annual Report. Our last Annual Report for 2022 – 2023 is available at: : how-we-are-performing

Grouped customer responses to the WRMP consultation: Par Desalination Scheme

ID References: Reponses from 18 Customers	**Par Desalination Project**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
We received 18 responses to the consultation relating specifically to the desalination project at Par in Cornwall.	The Par scheme is an ongoing project under our current investment programme and does not form part of our WRMP. These responses are being managed by the Par Desalination Project Team.	More information about the desalination scheme at Par is found on our website at: Desalination

2. Regulators

ID Reference: R01	Historic England (all SEA related comments and responses are found in the Addendum to the SEA SoR)	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
1. Lack of reference to the historic environment: 1.1 We remain concerned that the dWRMP24 fails to describe the historic environment of the plan area, which is of great significance and includes its historic buildings and settlements, archaeology, coastal heritage, World Heritage Sites, a range of geologies and landscape character areas.	We recognise that the importance of the historic environment was not fully acknowledged in our previous versions of the Main Technical Documents. We will address these concerns in the WRMP v3 due for publication in early 2024.	Main Technical Report - Section 3: Setting the Scene
2.2 We do, however, welcome the fact that the revised draft Plan contains a dedicated Best Value Objective to 'Optimise land use – Develop our preferred Plan with full consideration of environmental appraisal, including the SEA…'. This appears to be the main, and possibly the only, way in which heritage considerations feed into the decision-making process for the Plan.	Thank you. Our decision making process is explained in section 8 of our Main Technical Report. We have assessed a range of options to develop our Best Value Plan which is informed by a full Strategic Environmental Assessment that includes heritage considerations. Full details of our best value methodology are included in Appendix 6. We will include further narrative on the range of alternative supply and demand strategies that we have assessed and how these perform across a range of factors including a wide-range of environmental aspects, cost and customer affordability, deliverability and carbon emissions, to better-evidence how we have balanced these competing factors. This will be included in an updated draft WRMP in 2024.	For more information please see Main Technical Report - Section 8: Decision Making Process and Appendix 6.
4. Environmental Destination and sustainable abstraction 4.1 Historic England acknowledges and supports the commitment within the South West Water dWRMP24 to secure environmental improvements. However, this aspect of the Plan while understandably having a strong focus on the natural environment, again lacks recognition of the historic environment.	Our approach to Environmental Destination is set by the Environment Agency's water resource management plan guidance which is focused on ensuring Sustainable Abstraction to benefit the natural environment. An updated Strategic Environment Assessment that reflects our October 2023 plan, will be published on our website in January 2024. This will provide a comprehensive review of the impacts on all environmental measures. We will summarise the findings of our Strategic Environmental Assessment for the alternative plans/ strategies assessed as part of our decision making process in our updated Appendix 6 and Section 8 of the Main Technical Report. WRMP v3 due for publication in early 2024.	Please see our updated Appendix 6 and our Main Technical Report
4.2 We acknowledge South West Water's reference, within their Statement of Response, to work with Historic England on peatland	Many of our supply options have further studies, feasibility and design work that need to be completed to enable us to fully understand the	Refer to Appendix 4 and 4.1 for supply

restoration. Nevertheless, we consider that the Plan itself would benefit from more explicit recognition of the influence of water management on the historic environment, recognising the potential impacts of abstraction on archaeology, palaeoenvironmental remains, or water dependent heritage assets.	possible impacts on the historic environment, and look at ways to mitigate or enhance historic features through scheme implementation. The supply options are explained, based on the extent of design and feasibility work completed to date, in Appendix 4 and 4.1. These chapters also provide a summary of the environmental impacts – with further detail provided in Appendix 7.	option details, and full details of the SEA is contained in Appendix 7.
5.2 Within the revised dWRMP24, 11 preferred supply-side options are selected within the Best Value Plan. An additional 7 options are identified that could be brought forward as part of an adaptive strategy. We note that, with the exception of the SROs and several others, the choice of preferred and adaptive options has changed considerably since the previous consultation. In this regard, we note the removal of a number of schemes with which we had concerns about potential historic environment impacts, namely: COL2 Colliford Reservoir Storage Stage 2 - Lower River Camel Abstraction; COL11 Abstraction from Hawk's Tor Pit (nb. the Statement of Response refers to this scheme being part of the Drainage and Wastewater Management Plan, which we think may be an error); WIM8 Bramford Speke; BNW11 Christchurch WWTW IPR 2 - Transfer to Longham Lakes; COL9 New reservoir at Leswidden Pool and transfer to Drift Reservoir. However, we understand that some of these proposals may now be amongst the selected 'drought' options, while others may be being brought forward sooner under AMP7?	Our constrained list of options has been updated as we receive more information on options which allow us to take them through the screening process. This includes the drought permit options. At the same time, due to drought, some options which were in the WRMP have been removed because they have been accelerated into AMP7 delivery. The comment on Hawks Tor Pit being delivered as part of the DWMP is an error, we will ensure this is updated to WRMP in future plan iterations.	Please see Appendix 4, Supply Options, and Appendix 7, SEA.
5.3 It remains the case that within the Plan itself there is very little information about the nature and location of these schemes. It is therefore difficult for Historic England to understand their potential impacts on the historic environment or to comment in detail on the findings of the SEA.	We can provide additional information on our supply side schemes, only available upon request, that gives more information on the precise location of each scheme. Unfortunately, this detail cannot be published for reasons of national security, but we are happy to make this available. The assessment of potential positive impacts on the historic environment associated with the WRMP is captured within the SEA Framework (Objective 6 - see Table 7.2 of the SEA Environmental Report). The SEA team have liaised closely with the option engineering teams to refine pipeline routes for options and avoid constraints, including heritage assets. See also detailed assessment matrices in SEA Environmental Report which contains recommendations for potential opportunities to enhance the significance of heritage assets, where identified. *Note: these are strategic assessments and further studies, surveys and assessments will be undertaken during option development.*	Please see Appendix 4, Sections 1 & 2 & Appendix 7

ID Reference: R02	Environment Agency (all SEA related comments and responses are found in the Addendum to the SEA SoR)	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
R1: Deliver new supply options by the start of WRMP24- R1.1. Colliford and Roadford AMP7 programmes. Following the drought in 2022, South West Water are looking to implement a number of supply options in Colliford and Roadford zones to improve resilience. These options are: Stannon, Porth Rialton, Blackpool Quarry, Hawks Tor, Par Docks desalination, Challacombe and Gatherley. We have concerns with how some of these options have been included in the company's WRMP: • Stannon – In 2023, we issued a Groundwater Investigation Consent to South West Water for Stannon on the understanding that this was preparatory work for a licence application. We were therefore expecting this in the company's baseline. However, the company does not appear to have done so. • Porth Rialton – in its plan, South West Water outline that this will be a summer licence. This is incorrect, current discussions with SWW in enhanced pre-application are for a winter only licence. • Blackpool Quarry – the revised draft plan states that this will be a raw water transfer to Restormel WTW. The EAR provided with the licence application is for transfer to Colliford reservoir. • Challacombe – we were expecting this to be in the company's baseline, but it does not appear to be. We are currently in the process of determining an application for this licence. • Par desalination – recent discussions at the Regulatory Body Working Group have highlighted that there are delays to the delivery of the scheme and a risk of it not being in place by March 2025.	The WRMP v3 will be updated with the latest baseline position for Colliford and Roadford based on the latest information. (Appendix 1) The current position of each scheme and its position in our WRMP v3 is outlined below. Stannon: The current GIC at Stannon is providing 3.8 Ml/d increase in abstraction. This provide resilience benefits to Colliford Reservoir but it does not increase the WRZ WAFU. The schemes presented in the WRMP baseline position were only those which provide a WRZ WAFU benefit. Porth Rialton: The licence application is now for a winter only abstraction. This change in application happened after our WRZ baseline DO assessment was undertaken. We will update our draft final WRMP24 to include the winter licence assumptions. Blackpool Quarry: During discussions with the EA in December 2023 it has been agreed that initially the water will be transferred to Restormel WTW. After further discussion and agreement SWW will apply for a variation to allow the water to also be transferred to Colliford Reservoir. Challacombe: The Challacombe abstraction licence application provides local resilience benefits to treat water from Whistlandpound but it does not increase WRZ WAFU. The schemes presented in the WRMP baseline position were only those which provide a WRZ WAFU benefit. Par desalination: We are continuing with our focus on delivering against our existing plans, which includes liaising with various regulators and planning authorities. In WRMP v3 we will provide more detail on the latest plan, risks and mitigations associated with the delivery of this scheme. We are still planning to continue with licence applications for Stannon and Challacombe. This will be clarified and updated in the WRMP v3.	Please see Appendix 1, Appendix 6 and Main Technical Report

R1.2. Isles of Scilly AMP7 programmes. South West Water has needs to invest in additional desalination on the Isles of Scilly. The company has included desalination on the Isles of Scilly from 2025. However, we have been told that there is a significant risk that the delivery of desalination will be delayed until 2026.	We will ensure that this risk is captured in our WRMP v3.	Please see Appendix 1
R1.3. AMP7 programme delivery risk. As outlined in Recommendations 1.1 and 1.2, the company are seeking to implement a significant number of supply side options in the remaining years of AMP7 for Colliford, Roadford and the Isles of Scilly. There is significant uncertainty whether the company will be able to deliver all of the options by the start of AMP8. We raised this concern with the company during pre-consultation. The company told us that this would be included in the plan and there may even be an adaptive pathway for AMP8 to capture the risk. However, the revised draft plan does not appear to have any appraisal of this risk or a plan for if the risk is realised.	We acknowledge this risk and will provide clarity in the WRMP v3. This will include a section which demonstrates the impacts of the scheme uncertainty on our baseline supply-demand balance position and what the options are for mitigating this uncertainty.	Please see Appendix 1 & Appendix 3
Recommendation 2: Ensure alignment between the plan with the regional plan and neighbouring water company plans R2.1. Differences in volumes and timings between plans. There are inconsistencies between water company WRMPs in volumes and timings for when an option is due to come online. Utilisation appears to impact how each company has reflected volumes, Poole Water Recycling and Transfer SRO has a deployable output of 12.5 Ml/d. In the preferred plan, South West Water require 6.25 Ml/d in 2035/36. In Wessex Water's plan, the need is on its higher need pathway for 5.25 Ml/d, also in 2035/36, leaving an extra 1 Ml/d. For the Mendips Quarries SRO, the need for South West Water is for 12.5 Ml/d in 2042/43. Wessex Water, in its higher need pathway suggests a benefit of 11.85 Ml/d, with a lead in time of 22 years, with development beginning in 2049.	We are working with Wessex Water and the WCWRG to ensure there is consistency between plans, and we will present this within our WRMP v3. This will include a narrative to explain the way in which the resource benefits will be shared.	Please see our Main Technical Report
R2.2. Wessex Water alternative futures scenarios. South West Water has not considered the future need of the Poole Water Recycling and Transfer or Mendips Quarries SROs by Wessex Water. The company's scenarios should consider where resources may be shared, i.e. if one company has selected the resource in its preferred plan and another has selected it in its alternative future, then both companies must take this into account	We are working with Wessex Water and WCWRG to ensure there is consistency between plans, and we will present this within our WRMP v3. This will include a narrative to explain the way in which the resource benefits will be shared.	Please see our Main Technical Report

R2.3. Bristol Water surplus. Since publishing its SoR, it has become apparent that from 2035 onwards, Bristol Water will have a large supply-demand surplus of over 50 Ml/d in its final plan. The water companies must justify why constructing the Cheddar 2 Reservoir SRO, which gives a benefit of 13 Ml/d to South West Water, is better value than utilising Bristol Water's surplus to provide resilience to South West Water through a transfer.	We will provide additional information on the use of Cheddar 2 Reservoir SRO within our WRMP v3. As part of this we will show how this links with the apparent current suplus in the Bristol WRZ.	Please see our Main Technical Report
R2.4. Inclusion of SROs as transfers in all plans. Where a source of water is being developed in one company's operating area to be used in another, the interconnections must be shown in both the plan and the planning tables. Cheddar 2 Reservoir and Mendips Quarries SRO are options in South West Water's WRMP24 and WCWR's regional plan, both located in Bristol Water's supply area. The options do not appear in other plans other than Cheddar 2 appearing on Bristol Water's unconstrained option list. Whilst not proposed to provide a supply benefit to either Wessex Water or Bristol Water, the SROs should appear in each company's planning tables as an abstraction and export, or as an import in and transfer out, as applicable, resulting in zero benefit in deployable output for each donor company. Each SRO should appear in South West Water's plan and tables as an import.	We will liaise with Wessex Water to ensure this feedback is actioned.	Please see our revised Planning Tables
Recommendation 3: Ensure the plan does not constrain planned growth and achieves sustainable abstraction. R3.1. Show that the plan meets the requirements of the River Avon SAC. The company does not provide clear evidence of how the plan meets relevant local growth, including new developments, in its Bournemouth zone without increasing or delaying action to reduce abstractions that may adversely impact the River Avon SAC. On p81 section 4.5.3 South Wast Water state 'In the short term we have agreed to reduce our existing abstraction licences on the Avon. This will ensure that our abstraction does not grow to service the demands of new development and growth in the Bournemouth WRZ'. This statement is incorrect. The licence cap will prevent peak abstraction growth, but it will not prevent overall abstraction growth, as on a number of days, the company could increase the abstraction to peak levels.	The licence caps we have agreed for the River Avon ensure that our annual abstraction rate cannot grow compared with that of 2022. Our demand forecast is a local plan based forecast which includes the local development currently planned in Bournemouth WRZ. We have prioritised the Bournemouth WRZ in our demand programme, reaching full compulsory metering by 2030 and AMI metering by 2035. We can deliver our first phase of ED reductions in 2030 in Bournemouth WRZ (of 25 Ml/d) whilst remaining in a supply-demand surplus. In our updated draft plan, we will ensure that there is clarity that these steps ensure we are not constraining local growth whilst balancing the need to achieve sustainable abstraction.	For more information please see our Main Technical Report

R3.2. AMP8 Supply- side options. In its preferred plan, South West Water only have benefits from supply side options from 2030/31. There are no new supply side options being progressed in AMP8. This is of particular importance in the Bournemouth zone, where new supply options could support meeting sustainability reductions and environmental destination sooner.	We acknowledge this feedback and will clarify the position in the updated rdraft plan. We will also improve our presentation of the dates of implementation.	For more information please see **Appendix 4, Appendix 4.1 & Appendix 6**
R3.3. Bournemouth adaptive pathway. Figure 34 in the company's main plan provides a diagram of the company's adaptive pathways. This diagram shows that South West Water do not have an adaptive plan for the Bournemouth zone. There is significant risk with the options selected for the Bournemouth zone, specifically resulting from the reliance on demand management.	One of the scenarios we have considered in our decision making includes the uncertainty in the delivery of the demand programme. The uncertainty in the demand side programme is mitigated by the supply-demand surplus in the final plan that will be delivered by the supply options. We will be reviewing our decision making ahead of our WRMP v3 and will review our adaptive pathways based on the consultation responses we have received.	Please see Appendix 6
R3.4. Bournemouth options, desalination and Fawley. As outlined in Recommendation R3.1. South West Water are not able to fully deliver Environmental Destination in its Bournemouth Zone until 2042. However, it does not appear to have considered all options including desalination for this zone. South West Water are progressing desalination for Colliford zone, to improve resilience following the 2022 drought, and for the Isles of Scilly (to deliver DWI requirements). It is therefore unclear why it has not considered desalination for Bournemouth zone to meet environmental requirements as soon as practicable.	Desalination has been considered as an option for our Bournemouth WRZ throughout the options screening process. We will update our final plan to provide further details of the process for desalination. Engagement with the Fawley Refinery will continue.	Please see Appendix 4
R3.5. Licence capping and Environmental Destination. In the first paragraph of Appendix 1 Section 4.5.2, the company seems to imply that the original licence capping figures would be enough to meet the requirements of the Environmental Destination. This is not necessarily the case, particularly for Knapp Mill and Matchams. Additionally, final licence changes may be more complex than simply capping licence volumes. Licence changes could involve changes to Hands off Flows, as an example, or other licence conditions. The required licence changes will be determined by the investigations in AMP8.	We have presented the Environmental Destination (ED) including licence capping and longer term reductions. In our original draft WRMP we only presented Environmental Destination as longer term reductions. We assume that licence caps are in place from 2030, with the exception of Hampshire Avon which is from 2025, and our delivery of ED varies by WRZ from 2030 to 2042. A summary for each WRZ is provided in Appendix 1 Section 4.6 with a clear timing of when reductions will be implemented across AMP8, AMP9 and AMP10+.	Please see Appendix 1 Section 4.6

The plan is unclear on if or when abstraction will be at a sustainable position and meet flow targets.		
R3.6. Reducing Level of Service to support environmental destination. In Table 40 in the main technical report South West Water outline that the Bournemouth zone will meet 1 in 500-year resilience from 2025, but that it will not meet Environmental Destination ambitions until 2042. Based on this, it appears that sustainability reductions are being delayed in Bournemouth until 2042 to support meeting a 1:500-year drought resilience from 2025. The company does not appear to have assessed the option of having a reduced level of service of 1:200-year up until 2040 in its options appraisal. This could be used to support the earlier delivery of sustainability reductions.	We will update our WRMP v3 to better reflect the risks in the Bournemouth WRZ in relation to 1 in 200 and 1 in 500 year drought and the impact of Environmental Destination. We will discuss this with the Environment Agency to ensure our WRMP v3 aligns with guidance and expectations, and the way we present our Bournemouth WRZ planning problem.	Please see our Main Technical Report.
R3.7. Otter Valley WINEP investigations. In Appendix 1, Section 4.2.1, on AMP7 WINEP Investigations, the sustainability reduction for the Otter Valley groundwater sources only includes volumes required to meet the Environmental Flow Indicator under the Recent Actual scenario. However, there will be additional reductions required in the full licence volumes to reduce the risk of deterioration. The plan states a licence change of 4 Ml/d, but the actual change to the licence is likely to be larger than 4 Ml/d to meet the Environmental Flow Indicator. Furthermore, Section 5.4.1 on sustainability abstraction reductions and WINEP, states that the company has "considered where WINEP investigations with known outcomes are impacting on DO. At present, only the Colliford WRZ will be affected as a result of the De Lank River licence change". Sustainability reductions will also be required for the river Otter. The text implies that the licence reductions will have no impact on deployable output."	We acknowledge that our description of the Otter Valley WINEP investigation and current position requires further detail to provide assurance that this scheme is represented correctly in our WRMP. The Otter Valley WINEP reduction does not impact on our DYAA Wimbleball WRZ WAFU. We will update the description to clarify the WRMP impact and the AMP8 WINEP work that will implement this reduction.	Please see Appendix 1, Section 4.2.1.
R3.8. Source implementation and Hampshire Avon phased reductions. The link between new source implementation and the Hampshire Avon phased reductions is not clear. In the main plan, Figure 35 and Table 41 do not clarify what the 2030 Environmental Destination reduction means, or why this is 25 Ml/d when the Ampress scheme is 1Ml/d and licence capping is greater than 25Ml/d.	The final ED profile is designed to ensure that the supply-demand balance remains positive. The solid black line in Figure 35 is the final plan DYCP scenario which includes the supply and demand options being delivered and the ED reductions. We will provide greater explanation of the phasing of ED and how this links to our supply strategy in our final plan to ensure this is clear.	Please see our Main Technical Report Section 10.4.1
R3.9. Licence capping impacts on WAFU. In the Appendix 1, the company states that licence capping does not affect WAFU in the	The increase in capacity of Restormel WTW is to allow the treatment of water from sources that are not impacted by licence capping, for	Please see Appendix 6 and

Colliford zone because deployable output is constrained by the capacity of Restormel WTW. However, increasing the capacity of Restormel WTW is an option selected in the preferred plan. This could change the assessment of the impact of licence capping on WAFU.	example, Desalination/ Blackpool Quarry. Therefore the impacts of licence capping would remain unchanged.	our Main Technical Report
R3.10. Licence capping implementation dates. In its WRMP South West Water has outlined that it has assumed that Licence Capping reductions in WAFU are in place from AMP9 (2030) onwards to align with the expected outcomes from AMP8 WINEP investigations. Actual licence changes may be introduced by March 2030 dependent on the AMP8 WINEP investigations. It is also unclear from the text whether the company has ensured that there will be no growth at the abstractions at the focus of no deterioration investigations.	We acknowledge that the AMP8 WINEP investigations may require licence changes to be introduced by March 2030. Our WRMP assumes that the potential WAFU reductions commence from the April 2030. There is a high degree of uncertainty on the licence capping impacts and the steer from the EA is that this uncertainty cannot be included within AMP8. The aim of the licence capping assumptions is to cap the abstraction at recent actual levels which ensures that this abstraction can therefore not increase (i.e. no growth). We will include text in our WRMP v3 to confirm this fact.	Please see Appendix 1 - Section 10.
R3.11. Uncertain sustainability reductions. In the Appendix 1, Table 8 shows the relevant sustainability reductions, however some reductions are presented as 'TBC'. These licences changes are confirmed and not potential. There is not enough detail explaining how the volumes required to meet environmental destination have been decided. River Porth at Rialton is presented in the table but the plan does not clarify that it is an unused licence. Stoke Canon and Brampford Speke might not impact WAFU, and is not used, which is also not explained."	We will ensure that it is clear where sustainability reductions are confirmed and where there is uncertainty in the volumes in our WRMP v3.	Please see Appendix 1, Table 8
Recommendation 4: Understand, monitor and respond to the rising trend in demand in the company's supply area. R4.1. Demand scenarios. As part of the company's first WRMP24 consultation, we raised concerns with the company that it was not testing its plan against high enough demand scenarios. We asked the company to review its 'high high high' demand scenario to ensure it adequately captured all the risks in it: • Failing to meet its demand management programme forecasts • Higher rates of property and population growth • Switching of private supplies to mains water	We will add extra commentary/ explanation around the high high high scenario.	Please see Appendix 2 and Appendix 6.

In its revised draft plan, the company has not provided assurance or evidence that the 'high high high' demand scenario is high enough to cover all the bullet points listed above."		
R4.2. Monitoring more frequently than annually. In AMP7, South West Water has been unable to deliver its demand forecast set out in WRMP19. As a result, Defra has requested the company move to 6-monthly reporting. The company has set out that it intends to review its adaptive pathway decision point metrics annually. We do not believe this is frequently enough. This is as the company's WRMP24 is heavily reliant on delivering its demand programme and forecast. Historically the company has been unable to deliver the demand reductions it forecast by a significant margin.	We will review and update our demand-side monitoring plan in Appendix 6 as part of our WRMP v3.	Please see Appendix 6
R4.3. AMP7 to AMP8 DI gap. In its WRMP planning tables, South West Water has forecast that it will be starting AMP8 with a DI of 625.32 Ml/d. This is 22.27 Ml/d less than reported in its Annual Review 2022/23. South West Water has struggled to reduce DI over AMP7. Presently year to date DI is only 0.3% lower than it was in 2022, despite implementing demand actions, including temporary use bans in both the Colliford and Roadford zones, and significantly milder and wetter conditions in 2023. It is therefore unclear how it intends to get DI down to 625.32 Ml/d under 1 in 500-year drought conditions by 2025/26.	Achieving demand reduction has been particularly challenging during AMP7 due to the COVID-19 impact on water use at the start of the AMP, followed by a drought and extreme freeze-thaw in 2022/23. This has meant we have had to review our demand reduction delivery plan for AMP7 to introduce new inititives and enhance our existing inititives to counteract the impacts of these events. In November 2023, we provided our regulators with an action plan for reducing DI as part of our annual review reporting against WRMP19. This includes the initiatives we are delivering in the remaining years of AMP7 to reduce demand ahead of 2025/26. We have also created a DI task force, which is a dedicated team focused on delivering demand reduction, and working collaboratively across the relevant teams to continually review and assess the effectiveness of the initiatives. We shall add a reference to the action plan and the types of initiatives being delivered in AMP7 to Appendix 2 of WRMP24. The year-to-date comparison includes the continued impact of the December 2022 freeze/ thaw event into March 2023, thus increasing 2023 calendar year DI. A financial year comparison shows DI being closer to 1.5% lower in 2023/24 compared to 2022/23.	Please see Appendix 2.
R4.4. AMP7 to AMP8 leakage gap. In its WRMP planning tables, South West Water has forecast leakage to be 94.14 Ml/d in 2025/26, 18.1 Ml/d lower than reported in its 2022/23 Annual Review. This is a very significant decrease for the company to	Appendix 2 section 4.1.2 provides information on actions we have taken to enhance our leakage reduction activity. We experience a higher volume of leakage during droughts and freeze-thaw events, and the weather of 2022/23 resulted in a higher than planned annual average leakage. We are continuing to review our leakage initiatives as	Please see Appendix 2 section 4.1.2

achieve in three years, given the company's historic leakage performance.	part of our action plans for reducing DI (see above) and we will update Appendix 2 to align with this.	
R4.5. AMP7 to AMP8 PCC gap. The company has forecast PCC to be 149.8 l/h/d in 2025/26, 7.7 l/h/d lower than the figure reported in 2022/23. 2022/23 was a dry year which the company stated had a return period of 1 in 20 to 1 in 30 years. WRMP24 is based on more extreme 1 in 500-year droughts. Given this, it is unclear how the company can achieve the significant drop between 2022/23 Annual Review reported figures and the 2025/26 forecast. In addition, the PCC reported in the WRMP planning tables for 2022/23 do not align to the data the company submitted for its Annual Review.	We will update 2022/23 demand data in the WRMP tables to align with the reported values. We have provided regulators with an action plan for PCC reduction as part of our annual reporting and the DI action plan noted above. AMP7 initiatives to reduce PCC are discussed in Section 2.4 of Appendix 2 and we shall update this to reference the action plan.	Please see Appendix 2. Section 2.4
R4.6. Demand base year. In its WRMP, South West Water outline that it used 2019/20 as its base year for demand as it was the last year unaffected by COVID-19 and drought restrictions. The company state it then applied an uplift factor to this to get to a DYAA. However, in the Ovarro report provided by the company (Appendix 2.1), it states that 2021/22 was a suitable year to be used by the company as the base year. This is therefore contradictory to the base year the company has used. Additionally, the company has not provided any evidence or assurance that the uplift factor used is sufficient to cover 1 in 500 drought conditions. As outlined in Recommendation 5.2, the company is forecasting a DI of 625.32 Ml/d in 2025/26, which is 22.27 Ml/d less than reported in its Annual Review 2022/23. This would appear to imply the uplift factor is not great enough.	We chose not to use 2021/22 as our base year due to the continued impacts of COVID on demand and have worked closely with Ovarro to deliver the most representative long-term demand forecasts. Whilst 2021/22 data could be used as the basis for our demand forecasts, the impact from changing to a 2021/22 base year had significant impacts on our 25 year demand forecasts which, upon review, were not appropriate. In reviewing our demand forecast, Ovarro included 2021/22 data in their analysis to generate our current uplift factors. We will ensure that this is explained in Appendix 2.	Please see Appendix 2.
R4.7. Baseline non-household programme assumptions. In Section 1.6 of Appendix 2, the company set out its assumptions for the household demand reduction programmes for its baseline. However, it is unclear what assumptions it has made on the baseline non-household programmes, and whether it has factored in both its own and retailer programmes.	We will clarify our assumptions for our household and non-household programmes in the baseline in our updated draft Plan.	Please see appendix 2.
Recommendation 5: Ensure that water supplies are planned and managed to be resilient to drought.R5.1. Drought plan reconsultation. As a result of the drought in 2022, South West Water has identified material changes to its drought plan. It will therefore be reconsulting on its drought plan in 2024. The water resources planning guidance	The review of the Drought Plan planned for 2024 will include the lessons learned from the 2022 drought, as well as changes that are required as a result of the actions we have taken to increase our supply. We have been able to reflect some of these actions within this WRMP, for example bringing Blackpool Pit into service. Other aspects,	Please see Appendix 9 - Lessons from drought

requires companies to ensure water resource management plans and drought plans are aligned. As the company will be reconsulting on its drought plan, it is unclear how the company will ensure both plans will align.	such as the full review of the benefits of demand-side actions will not be complete in time for inclusion within this Plan, and we can't pre-empt the results of the analysis that we will feature in our updated Drought Plan. In our WRMP v3, we will provide further detail of the assumptions that have changed from our previous Drought Plan as a result of our experience of the 2022 drought, which we expect to carry forward into the updated Drought Plan.	
R5.2. Sources response to drought. In our last representation, we raised concerns with the company's methodology to calculate groundwater source yields. In its plan, the company state that it used the UKWIR "Source Yield Handbook" (2014). It also says that the company has updated its assessment following the drought of 2022. However, the company does not provide enough information on how the appraisal of groundwater DO followed the handbook. It also does not provide an explanation of how the assessment has been updated following the drought nor what impact this reassessment had on its DO. Additionally, Appendix 1 section 3.6, indicates that work is still ongoing for a formal source-yield assessment for the Isles of Scilly and that this will be complete for the final plan. It therefore appears that the DO assessment for the Isles of Scilly is not complete.	We will provide more details on our groundwater deployable output assessment in Appendix 1 in our WRMP v3. For the Isles of Scilly we are limited by the quality and length of available data. We have ongoing work to undertake a full DO assessment for our groundwater sources which we will use to update the Isles of Scilly supply-demand balances. Because of the AMP7 desalination development, the revised DO assessment will not affect the Isles of Scilly WRMP programme.	Please see Appendix 1
R5.3. Actual and planned LoS. In our May 2023 representation, we raised with South West Water that it had not presented its actual levels of service as well as its planned levels of service. The levels of service tables provided in Section 2.6 of the main technical report and Appendix 6 still only outline the company's planned levels of service	We will update Appendix 6 with information on our actual levels of service for our WRMP v3.	Please see Appendix 6
R5.4. Drought vulnerability curves. In its February 2023 draft plan, South West Water provided information on its drought vulnerability assessment. As part of this it included response curves to demonstrate which types of droughts it would be vulnerable to. In its revised draft plan, the company has provided a short summary of the work it did as part of the drought vulnerability assessment in chapter 2 section 2.5. However, it does not provide the response curves that were previously present.	We will provide further information on the drought vulnerability response curves in our WRMP v3.	Please see Appendix 1

R5.5. 2022 drought resilience – WRMP guidance update. Whilst South West Water was consulting on its first WRMP24, the Environment Agency released an updated version of the WRMP planning guidance. This included a list of requirements companies needed to consider following the 2022 drought. South West Water has included most of the requirements from the guidance within its plan, however it does not appear to have considered them all.	We will review the guidance and ensure that we provide clear signposting to the information required within Appendix 9, and other sections as necessary.	Please see Appendix 9
R5.6. Drought permits and abstraction licence changes listed in planning tables are not complete. In our May 2023 representation, we asked South West Water to ensure all of the 2022 drought interventions in its WRMP appear as either drought actions or in its baseline. However, the company has not included the upper Tamar Lakes drought permit in its plan. There may be other drought actions from 2022 which have also been excluded	We will include the Tamar Lakes drought permit in our planning tables. There are no other drought permits used in 2022 that should be included.	Information is in Table 6
Recommendation 6: Provide completed Environmental Assessments. R6.1. SEA and HRA. As part of its pre-consultation, South West Water notified us that it would be unable to provide a fully completed SEA and formal HRA. This is as the company identified options which its consultants did not have sufficient time to fully integrate into the assessments. The revised draft WRMP24 did not include a fully completed SEA and formal HRA, as notified by the company.	We will be submitting an updated SEA Appendix, to align with our submitted October revised draft WRMP, containing a full set of completed Environmental Assessments.	Our revised Chapter 7 is due to be issued in January 2024.
R6.2. Impact of incomplete environmental assessments on options. Linked with Recommendation 6.1, it is unclear whether the incomplete SEA and formal HRA would have an impact on the options selected by the company in the programmes presented in the plan	We are currently reviewing our decision-making around our best value plan using the completed environmental assessments to ensure it has no material impact on our best-value plan choices. The outcome of this next phase of decision making will be included in our WRMP v3.	Please see Appendix 6
Recommendation 7: Meet the Environmental Improvement Plan demand targets. R7.1. Environmental Improvement Plan PCC target. In its revised draft plan, the company's PCC forecast in 2037/38 is 127.5 l/h/d. It therefore does not meet the 2038 Environmental Improvement Plan (EIP) PCC target of 122 l/h/d. The company do admit this in section 6.7 of Appendix 6. However, the company do not provide evidence that it has done everything it can to meet the 2038 EIP PCC target, and therefore does not justify why it cannot meet the target.	We will provide further information on the range of demand scenarios tested to help inform our best value demand strategy to optimising our PCC targets within our updated Appendix 6.	Please see Appendix 6

R7.2. Environmental Improvement Plan non-household targets. In its revised draft plan, the reduction to the company's non-household consumption is 7% by 2038 and 10% by 2050 from 2019/20 level. It therefore does not meet the 2038 or 2050 Environmental Improvement Plan non-household target of 10% and 15% respectively. The company do admit this in section 6.7 of Appendix 6. However, the company do not provide evidence that it has done everything it can to meet the 2038 and 2050 Environmental Improvement Plan non-household consumption reduction target. The company notified us in pre-consultation that this was due to growth. However, in its baseline there is a 7.6% reduction from 2019/20 to 2049/50. Therefore, a final plan reduction of 10% non-household consumption by 2050 does not appear ambitious. The company does not justify why it cannot meet the target.	We will provide further information on the range of demand scenarios tested to help inform our best value demand strategy to optimising our PCC targets within our updated Appendix 6.	Please see Appendix 6
Recommendation 8: Ensure the plan is legally compliant by adhering to the WRMP directions. R8.1. Direction 3(c) sub paragraph (b), including but not limited to drought severity; The plan does not contain the methodology or assumptions in relation to the risk of temporary use restrictions, drought orders and emergency drought orders. The approach adopted does not show the company can meet the frequency 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. It also does not outline whether its levels of service are consistent between households and non-households. This issue was raised with the company as part of its February 2023 draft plan consultation. However, it does not appear to have been addressed	We will ensure that we provide a clear explanation of how we derived our current and planned levels of service in our WRMP v3.	See Appendix 6.
R8.2. Direction 3(d) Paragraph (i), (iv) and (v). The company has set out the outcomes of its greenhouse gas assessment within its plan, but no clear technical methodology and assumptions have been provided for the assessment of greenhouse gases in the plan. The company has not provided a clear explanation on how its WRMP v3 will support the company's ambition to reach net zero by 2030. The company has not provided a clear explanation on how the WRMP will support the UK governments greenhouse gas emissions targets and commitment. Therefore, the company has failed this Direction.	Our plan to achieve Net Zero, and how our WRMP supports this ambition, is discussed in our PR24 submission. We will ensure that this is explained in both Appendix 6, which will include a more detailed narrative on all plan-alternatives, and our Main Technical Report.	Please see Appendix 6 & our Main Technical Report.

This issue was raised with the company as part of its February 2023 draft plan consultation. However, it does not appear to have been addressed. The company has provided clarity on how greenhouse gases were considered as part of its options appraisal, but it does not go far enough and explain how net zero can be achieved with its plan in place.		
R8.3. Direction 3(h) Paragraph (ii). The company has not set out the number of meters that will not be charged by reference to volume, in other words shadow metering, over the planning period. The company only state the number of shadow meters in 2025. Therefore, the company has failed this direction. This issue was raised with the company as part of its February 2023 draft plan consultation. However, it does not appear to have been addressed.	We will include narrative in our updated Appendix 6 which will now include a detailed summary of the best-value plan and other plan alternatives, and ensure we explain how we expect shadow meters to change over the planning period.	Please see Appendix 6.
Improvement 1: Ensure that the narrative on meeting 1 in 500 drought resilience is clear and appropriately tested. I1.1. Clarity on the company's drought resilience. In the main plan on Page 9, the table shows the supply demand balance using a 1 in 200-year drought resilience until 2039 and then a 1 in 500-year drought resilience after 2039. However, the table appears misleading as the company states that it has modelled its baseline forecast using a 1 in 500-year drought deployable output assessment. Also, in its preferred plan it will be meeting 1 in 500-year resilience by 2025 in all zones. Furthermore, on Page 12 of the main plan the company states that "our best value plan enables us to be resilient to a 1 in 500 drought without the need for extreme demand restrictions by 2040 and to become less reliant on less extreme drought measures." This seems to imply the company will be 1 in 200-year resilient until 2039. Table 3 is also unclear stating that the company 'current and proposed' Levels of Service is meeting 1 in 200 years for emergency drought orders, despite the preferred plan meeting 1 in 500-year resilience by 2025.	We will ensure that our WRMP v3 is consistent and clear on when we meet the 1 in 500 year drought resilience.	Please see Appendix 6.
I1.2. Limited drought durations. In Appendix 1 Supply Forecast, Section 3.5.3, the plan only uses a single drought duration (18 months for Roadford and Colliford, and 12 months for Wimbleball) with a single start month (April for Roadford and Colliford and November for Wimbleball. The plan does not provide an assessment of droughts of different durations. It is not clear how the company has considered alternative start months and the impact this may have on the critical	We acknowledge that there are some limitations of our drought assessment methodology which is currently constrained by our existing water resources modelling tools. For our WRMP v3, we will have undertaken additional modelling in our Wimbleball WRZ (Section 3.5.4) to explore all 19,200 years of stochastic datasets and a wider range of drought events and characteristics. We focused on the Wimbleball WRZ because this WRZ	

drought duration. This issue was raised with the company in our May 2023 representation. In chapter 5 Appendix 5.2 of the company's draft plan, it was indicated that this improved analysis would be included in the revised draft plan. However, in its statement of response the company has stated that it will now do this for WRMP29. This is linked to recommendation 4.1. and will be important for South West Water to look at as part of its drought plan reconsultation.	had the highest senstivity to the drought scenarios we initially tested. Our other WRZs have infrastructure constraints which mean their DO is less sensitive to specific drought scenarios. Ahead of WRMP29 we will be developing our modelling capability to ensure we can undertake a fuller assesment of the drought vulnerability of all our WRZs as outlined in Section 11.4 on the main WRMP Technical Report.	
I1.3. Historical drought data. In Section 3.5.3, the plan states that an 'EVA was undertaken on the historical record from 1900 to 2020, covering 120 years of data'. It is not clear from the text where this 120-year record comes from, given that the historic flow data starts in 1957 or 1962 (depending on the zone), the HadUK rainfall data covers 1891-2020, and the stochastic rainfall data is modelled for 1950-1997.	We used the HadUK dataset to underpin this assessment in conjunction with our rainfall runoff models. We did not use the data between 1890-1900 because of the paucity of rain gauges in the region that underpin the HadUK dataset. We will update our text in Appendix 1 to make this clear.	Please see Appendix 1 section 3.3.1.
I1.4. Drought scenarios. The company has not presented a reasonable number of drought scenarios. In the planning tables, the lower part of Table 6 has not been filled in for a 1:200 or a historic drought.	We will update Table 6 in our planning tables for the WRMP v3 to include alternative drought scenarios for 1 in 200 and worst historic drought.	Please see Table 6 in the WRMP Planning Tables.
Improvement 2: Provide greater clarity on the options presented. I2.1. Water labelling. In its February 2023 draft WRMP, South West Water provided information on the assumptions it had made for water labelling in its plan. However, the company appear to have removed this information from its plan.	We will include information on our assumptions regarding water labelling in Appendix 5 and Annex 5.1.	Please see Appendix 5 and Annex 5.1
I2.2. Demand side preferred plan details. In its February 2023 draft plan, South West Water provided tables which outlined the detail behind its demand management programme. We asked for greater clarity on this in our May 2023 representation. However, the company appear to have completely removed the detail behind its preferred demand management programme from the plan. This information is present in its planning tables, but this may be an indigestible data format for its customers and stakeholders.	We will add further information into Appendix 6, which will explain more detail on our best value demand strategy in our draft WRMP. Some information is also contained in the Main Technical Report and the Customer Summary.	Please see Appendix 6
I2.3. Socio demographic data use in options. In section 2.4.1 of Appendix 2, the company present the socioeconomic make up of its household population by zone.	We will add further narrative to our Appendix 5.1: Demand options on how we will target Water Efficiency activities using the socio economic factors described in Appendix 2.	Please see Appendix 5.1 and Appendix 6

During pre-consultation meetings with the company, we were told that South West Water intended to use this information to inform and target its Water Efficiency activities. However, the revised draft plan does not appear to include any information on how the company does intend to use this information to target its activities."		
I2.4. Missing report in Appendix 2.1. Appendix 2 of the company's revised draft WRMP24 refers to an "Ovarro Household demand forecast 2021-22" report in Appendix 2.1. The company provided this report in its February 2023 draft plan as Appendix 6.2, however it is not included in the revised draft plan Appendix 2.1.	Appendix 2 should refer to the new version of the Ovarro report (2022-23) in Appendix 2.1. This reference will be updated.	Please see the revised Appendix 2.
I2.5. Selective metering. In the draft WRMP, South West Water do not outline any information on its selective metering strategy. This was raised in our May 2023 representation but has not been addressed.	We will clarify our preferred selective metering strategy within our Main Technical Report and an updated Appendix 6.	Please see Appendix 6 & the Main Technical Report.
I2.6. Demand side and supply side option risks. Section 10.9 of the water resources planning guidance sets out that companies should provide an assessment of the risks to option yield and deliverability. This information does not appear to be present for its demand side and supply side options.	We will look to provide further information on yield and deliverability uncertainty within our option-summaries.	Please see Appendix 5.1
I2.7. Lead in times and earliest start dates. As part of its supply side options appendices South West Water do not provide any information on the lead in times needed for the options it has appraised. It also does not include any information on the earliest start dates.	We will provide lead in times and earliest start dates within our option summaries.	Please see Appendix 4 & Appendix 4.1
I2.8. Infrastructure required. In addition to Improvement 2.7, South West Water do not provide enough information on what new infrastructure will be required as part of its supply side options.	We provide a summary in Appendix 4.1. We can provide more information on request.	Please see Appendix 4.1
I2.9. Resilience transfers documents. As part of its February 2023 consultation, South West Water provided a document outlining resilience transfers and interconnections it was planning as part of its business plans. These were transfers for which there were no DO benefit and therefore were outside the WRMP planning process.	We have noted your feedback. The document will be provided with the WRMP v3.	Please refer to PR24 Enhancement Case on Strategic Interconnectors - Link to EC

I2.10. Option dC2 clarification. The supply option dC2 'Stannon' is outlined as having a WAFU gain of 1Ml/d and increasing abstraction rate to 6 Ml/d. Currently the licenced abstraction rate is 4 Ml/d. It is therefore unclear how both statements about the feasible option can be correct. Additionally, the company has a Groundwater Investigation Consent for 8 Ml/d. It is therefore unclear how the feasible option fit with the Groundwater Investigation Consent. It is also unclear whether this option is a drought permit option or whether it is permanent supply option.	dC2 is a drought permit option allowing us to increase abstraction to 8 Ml/d in line with the current groundwater investigation consent. We cannot use Stannon at 8 Ml/d all year round, so the WAFU benefit is only 1 Ml/d. The permanent WRMP option has been removed from the WRMP because it is now in the baseline.	N/A
Improvement 3: Include further information on adaptive pathways decision points and monitoring plan. I3.1. Thresholds for moving to a different pathway. Table 17 in Appendix 6 sets out the company's monitoring plan for its adaptive pathways. This table sets out what metrics the company will be monitoring and the frequency of monitoring. However, it does not out line what the thresholds for moving to a different pathway would be. Additionally, it is unclear what sensitivity testing the company has done on the triggers for moving to an alternative pathway.	We will review and update our monitoring plan within our updated Appendix 6.	Please see Appendix 6
Improvement 4: Clarify actions on abstraction sustainability. I4.1. Licence capping definition. The plan infers that licence capping is a voluntary agreement with regulators where if the flow in a river drops below what is needed to protect the environment, then the company will abstract only the absolute minimum required to meet the needs its customer. This is incorrect as licence capping is not voluntary.	We will update our description of licence capping to ensure it aligns with latest EA guidance.	Please see Appendix 1, Section 4
I4.2. PR24 WINEP development. In Appendix 1, Section 4.2.2, Figure 2 does not seem to represent the PR24 WINEP development process as intended, but instead shows the process of WRMP24 development.	We will review our description of the PR24 WINEP and update this in our WRMP v3.	Please see Appendix 1, Section 4.2.2
I4.3. Abstraction Incentive Mechanism. In Appendix 1 Section 4.2.3, on abstraction incentive mechanisms, the company states that the river Otter is "... assessed as having Poor Ecological Status by the EA to which the current level of local abstraction may contribute". However, the AMP7 investigation has demonstrated that the level of local abstraction is contributing to the poor ecological status.	We will review our description of the Otter Valley AIM and update this in our WRMP v3.	Please see Appendix 1 Section 4.2.3.

I4.4. Time limited licences. The plan described time limited licences as being typically issued in places where ongoing monitoring of the environmental impact of our abstractions is required, which is not strictly true. All new licences are issued with a time limit, as a requirement under the Water Act 2003, irrespective of the requirement for monitoring. However, it is true that the Environment Agency would require monitoring where there was uncertainty in the environmental impact of abstractions, and in this case, may issue a shorter time limit than usual.	We will review our description of time limited licences and update this in our WRMP v3.	Please see Appendix 1 Section 4.4
I4.5. Environmental destination investigations. In Appendix 1 Section 4.5.4, Table 15, on environmental destination investigations in PR24, the Withey Brook abstraction is included in the Fowey investigation. This abstraction is in the Tamar catchment.	We will update this in our WRMP v3.	Please see Appendix 1 Table 15.
I4.6. WINEP abstraction investigations in AMP7 and AMP8. In the main report, Section 5.4.1 is not accurate with respect to the actions completed in AMP7 and those to be done in AMP8. For example, the Otter investigation was completed in AMP7 with sustainability reductions due at the end of AMP8. Therefore, it will not be possible to do further investigations to identify whether the reduced abstraction has been effective during AMP8. This also applies to the Camel de Lank WINEP abstraction investigation referred to in the same section.	We will review our descriptions of the AMP7 investigations and ensure clarity on the actions that have been completed in AMP7 and which are to be done in AMP8.	Please see our Main Technical Report - Section 5.4.1.
Improvement 5: Clarify the baseline supply forecast assumptions. I5.1. Emergency storage. In Appendix 1 Section 3.2.2, the company sets out its assumptions on emergency storage. However, it is not clear if the company has used net or gross storage figures. It is also not clear if the company's emergency storage includes fisheries bank releases. Additionally, South West Water share Wimbleball reservoir with Wessex Water. The text does not make it clear whether the emergency storage for Wimbleball has been agreed with Wessex Water.	Our fisheries bank release assumptions are discussed in Appendix 1 section 3.2.3 and as outlined in section 3.2.1. These are included within our MISER modelling as release profiles through the course of the year. These volumes are therefore not included in our emergency storage calculation in our WRMP because we would typically have made the releases prior to reaching emergency storage. We will provide greater clarity on our emergency storage assumptions in our WRMP v3.	Please see Appendix 1, Section 3.2.2.
I5.2. System response approach. In our May 2023 representation, we raised concerns with the company's supply forecasting approach. This is as the company do not use a system response approach. In its statement of response, the company commit to developing its modelling capacity for WRMP29.	We look forward to working with the EA in the development of our modelling capability for WRMP29.	N/A

I5.3. Rainfall-runoff modelling. Section 3 of Appendix 1 in Chapter 5 on the baseline deployable lacks detailed information on the rainfall-runoff modelling and it is unclear how the final DOs were derived.	The development of rainfall runoff models for WRMP24 focused on our reservoir catchments which most influence our WRZ deployable output. Details on this are provided in Appendix 1 Section 3.3. The rainfall-runoff models only provide simulated river flow sequences for input to MISER which is then used to determine the deployable output. The MISER DO assessment using the rainfall runoff models was validated against a historical naturalised flow assessment to test the robustness of the rainfall-runoff derived sequences. Ahead of WRMP29 we have a programme of work to review our existing rainfall-runoff models and ensure we have rainfall-runoff models for all our sources and inflows requirements.	Please see Appendix 1, Section 3.3.
Improvement 6: Ensure the plan appropriately assesses target headroom. I6.1. Estimating uncertainty. In its WRMP, South West Water has included adaptive pathways to mitigate against some of the risk resulting from uncertainty in its preferred plan. In its adaptive pathways, one reason the company would switch pathways is the demand management programme failing to deliver as anticipated. In its target headroom assessment, the company assess that meter uncertainty is a large proportion of the overall target headroom (between 60-85% depending on the zone). Meter uncertainty also seems to have been applied to the distribution input (and therefore the associated meter that is used in leakage calculations). But the company does not explain why source meter uncertainty (S6/2) has been combined with climate and catchment characteristics uncertainty (S6/4). Combining these suggests there are either errors around hydrological records and catchment modelling are fully correlated with meter errors, or they are insignificant.	We will review and resolve this for our WRMP v3.	Please refer to Appendix 3.
I6.2. Target headroom components. The company provide the detailed method it used in WRMP19 which contains the relative contribution of each headroom components. The company has not provided a new detailed method for headroom and has not provided information on the relative contribution of headroom components for WRMP24.	The detailed methodolgy is provided in Appendix 3, Section 2.7 and includes Headroom Component Sensitivity charts for each water resource zone. These show the percentage contribution of each target headroom component and changes over the planning period.	Please see Appendix 3, Section 2.7
I6.3. Target headroom variation. It was not clear from Appendix 3 why the Bournemouth and Isles of Scilly WRZs have a larger % target headroom than the Colliford, Roadford and Wimbleball WRZs.	We will resolve this in our WRMP v3.	Please see Appendix 3.

Improvement 7: Improve the assessment of outage and treatment works losses and operational use. I7.1. Outage allowance throughout planning period. In our May 2023 representation, we raised with South West Water concerns around the outage figures not changing through the planning period. In its revised plan the company still do not appear to consider whether outage allowance will change through the planning period. It also does not appear to consider the impact of capital expenditure and programmes of work on outage. The plan does not mention the breakdown of planned and unplanned outage or if there will be times when outage increases or decreases due to programmes of work. With new options, there is a risk of outage increasing which is not currently accounted for. Where options increase outage, the company does not have options that will then reduce outage to ensure it remains static throughout the planning period.	We will review our outage allowance and provide narrative to explain the profile throughout the planning period.	Please see Appendix 1: Supply forecast, section 7.
I7.2. Outage event selection. In its WRMP, South West Water only select outages when the output of a source works falls to 30% below the 30-day running average and the strategic reservoir in the zone is less than 90% full. This approach excludes legitimate outage events (for example, plant failure or partial source output reduction). Greater clarity is needed around how many and nature of the excluded "Operational decision" outages. Finally, the approach could mask the risk around seasonal events such as Autumn leaf fall, which was identified in the report, and freeze thaw events. This was raised with the company in our May 2023 representation. However, in its statement of response, the company focus on leaf fall rather than the larger issue of how the company select outage events. The company also say outage is low risk, but the company does not provide any evidence or justification for this.	A complete assessment of DO losses due to outage in a large conjunctive use system is challenging and potentially very time-consuming. This is because the impact of each outage would require modelling to understand it's impact on resource response in multi-season design droughts. This means that some filtering and simplification is required to ensure the process is workable. The 90% reservoir limit was sensitivity tested and described in section 3.4 of Appendix 1.1. While it is possible that the approach has led to the exclusion of some legitimate outages, the analysis assumes all outages are complete and therefore is likely to overestimate outage. We therefore do not consider this potential inclusion to be significant. Our view that outage is a low risk to the plan is based on outage allowances that are in line the the low historically reported outage figures given in our WRMP Annual Returns each year. The low levels of outage we have previously experienced result in low future outage allowances. Even large deviation from the outage allowances in the future do not result in significant differences in the resultant plan. We have recently reviewed and updated our approach to outage calculation and reporting in our Bristol supply area, and we will be extending this review to include our other WRZs over the next year. Once complete the results of this review will be reported annually, and will be considered in the outage analysis undertaken for WRMP29.	Please see Appendix 1.1

I7.3. Treatment works losses and operational use methodology. In our May 2023 representation, we raised that South West Water had not provided detailed assumptions and a methodology for calculating treatment works losses and operational use. This remains an issue with the revised draft plan. In addition, the company still forecasts treatment works losses and operational use for Wimbleball zone as 0Ml/d. The company state in its statement of response that it has reviewed this and is confident that all water used during treatment is returned to the start of the treatment process. However, this does not align with the 2022/23 annual review submitted in July. The company reported a treatment works losses and operational use of 1 Ml/d for Wimbleball zone.	We will provide additional information on our treatment works losses and operational use methodology in our updated rdraft plan. In our 2019 WRMP, no losses were identified in the Wimbleball WRZ, but a conservative planning assumption of 1 Ml/d was used instead of zero. We reviewed this position for our 2024 plan and concluded that the inclusion of a non-zero value was not appropriate within an adaptive plan. Our 2024 WRMP therefore reflects actual losses within the Wimbleball WRZ. We have continued to report 1 Ml/d losses within WRMP19 annual reviews in line with the WRMP19 assumptions.	Please see Appendix 1: Supply forecast, section 8
Improvement 8: Ensure that abstraction licence information is updated and representative. I8.1. Baseline supply forecast. In its Table 1b, the company appear to have included licences which have been incorrectly allocated to this table: • Licence 14/45/002/1894 (Uton borehole). This licence was revoked by the company in 2019. • Licence 14/45/002/2101 (Pynes Leat, Emergency PWS use). This licence is only for emergency use if the company cannot abstract from the main River Exe. Therefore, this is not additional water available to form the baseline supply forecast. • A number of unused licences which are not part of the preferred plan. As an example, River Yealm. We are expecting the company to apply to revoke unused licences.	We will update tables 1b and 1c to reflect this comment.	Please see Tables 1b and 1c
Improvement 9: Ensure the assessment of Climate Change and carbon emissions in the plan is robust and justified. I9.1. Climate change assessment methodology. In Section 5.2 in the Supply Forecast Appendix, it states that the Atkins scaling factors have been used to translate the impacts from RCP8.5 to RCP6.0 for use in the central planning scenario. However, it is unclear how these scaling factors have been applied.	The Atkins scaling factors have been applied directly to deployable output. We will ensure this is clear in our description in our WRMP v3.	Please see Appendix 1 Section 5.3.1.
I9.2. Climate Change assessment evidence. In section 5.5 of its main technical report, South West Water has referenced the water resources	We will review and resolve this for the WRMP v3	Please see Appendix 1

planning guidance from 2016. The latest version of the planning guidance was released in April 2023.		
I9.3. Climate change vulnerability assessment. In section 2.5 in the main technical report, the company discusses the Drought Vulnerability Assessment and explains the assessment of the water resource zones is included in the "Regional Planning Climate Change Assessment – Climate Change Methodology." However, there is no evidence of a Basic Vulnerability Assessment being carried out, or argument presented for why it has not been completed. Section 3.4.2 West Country Regional Water Resources Plan, page 48 says ""The impact of climate change in the Draft Regional Plan is estimated to result in a loss of water resource of between 102 and 169 ML/d by 2050 depending on the severity climate change scenario used"". This seems to contradict page 43 which states ""The climate change impact (under a medium emissions scenario) on water availability in our five water resource zones is estimated to be a ~14 ML/d reduction in water availability by 2050"".	We undertook a basic Vulnerability Assessment for each WRZ as part of the West Country Water Resources Group climate change assessment. We have followed a "High" vulnerability assessment for all our WRZs by considering a range of products and emissions scenarios from UKCP18. We will provide further details in our WRMP v3.	Please see Appendix 1
I9.4. Climate change impact on DO. In its revised draft plan, the company has clarified that it has used the UKCP18 products across its reports and consistently refer to the same product. However, there is no detail of how the UKCP18 products have been used and sampled. The company also show that its baseline deployable output is based on a medium climate change emissions scenario. However, the methodology of how the impact of climate change on DO has been assessed in unclear.	We will provide further information on our climate change methdology in the WRMP v3 to make it clear how the UKCP18 products have been used within the DO assessment.	Please see Appendix 1 Section 5.2 and 5.3.
I9.5. Climate change scaling impacts across time. In section 5.3.2 of Appendix 1 the company state that it applied linear scaling to climate change impacts as per the planning guidelines. It used a two-part scaling relationship, so the climate change impacts are tapered slightly in the first 5 years of the plan, with linearly scaled impacts reported from 2030s onwards. However, it's unclear why a two-part scaling relationship has been used and which year was scaled back from.	This is an incorrect description as we did not use a two-part scaling relationship in our climate change assessment. Impacts were scaled linearly from the baseline 1981-2000 (1990) to the future period 2061-2080 (2070). We will ensure this is updated in our WRMP v3.	Please see Appendix 1 Section 5.3.2.

I9.6. Carbon assessment Improvement. In its chapter on supply options carbon (Appendix 4 section 5), South West Water does not cover the methodology of carbon assessment or how uncertainty is captured. The company has summarised that there is uncertainty, and it has tried to capture this but there is no explanation on methodology. There is inconsistent signposting in documents, for example on the Document Map (p5, Appendix 5) it states that Appendices 5.3 to 5.7 are the additional supporting documents. Further on in this Appendix, it states	A carbon methodology will be included in our Appendix 4, for supply options. This will also include information on how uncertainty around carbon estimates has been used in the decision making.	Please see Appendix 4 & Appendix 6
I9.7. Feasible options total carbon. Section 8.3 of the water resources planning guidance details the information that should be provided for each option. This includes total carbon for feasible options. However, there are still feasible options that have TBC against them for carbon costs.	We will update Table 4 and Appendices 4 and 4.1 with information on our total carbon for feasible options.	Please see Table 4: Total whole life carbon, Appendix 4: Carbon impact of our preferred plan & Annex 4.1, Total carbon values for feasible supply options.
Improvement 10: Consider additional programmes and provide further programme information. I10.1. Additional programmes. In section 6.5 of Appendix 6 of the company's revised draft plan, the company outline that its Best Value and Best for the Environment and Society programmes are the same. The company has therefore only appraised two programmes, Least Cost and Best Value. Section 10.6 of the Water Resources Planning guidance calls for water companies to "compile and consider a range of programmes that demonstrate real differences in focus". It also says: "you should consider the least-cost programme (sub-section 10.4) and a 'best for environment and society' programme as alternative programmes as a minimum". As the company has only considered two programmes, it cannot demonstrate it has considered a range of programmes.	We are currently undertaking additional work in anticipation of this feedback to ensure we consider alternative programmes within our plan. This will include as a minimum Best Value, Least Cost, Core and Best for Environment and Society. Our Appendix 6 and the Main Technical Report will be updated to include these in our WRMP v3.	Please see Appendix 6.
I10.2. Worst-case programme. In its SEA, South West Water has included a worst-case programme. However, this programme does not appear as part of its main technical report or its Appendix 6 best value methodology.	The worst-case programme is not considered in our latest WRMP v3 and the SEA has been updated to reflect this in the version we have published alongside this Statement of Response.	Please see the SEA and its Appendices published on 20 December 2023

	In our WRMP v3, the SEA will be fully aligned with our WRMP programme.	
I10.3. Best value plan environmental impact. Figure 25 in Appendix 6 shows that the best value plan has more positive environmental impacts than the least cost plan. However, it also shows that it also has significantly more negative impacts than the least cost plan. As outlined in Improvement 9.1, the company has stated that best value and best for environment and society are the same plan. It is therefore confusing how this can be the case when the best value plan has a larger negative impact on the environment than the least cost plan. The company does state "This would initially suggest that the least cost is better for the environment, but it is important to consider the limitations of the data". The company also say that the high-level approach of comparing water resource plans has limitations and that it may not provide a comprehensive understanding of the plans' environmental performance. These statements are not sufficient justification or evidence for the best value plan appearing to have a proportionately greater impact on the environment	We are currently undertaking additional work in anticipation of this feedback to ensure we consider alternative programmes within our plan. This will include as a minimum Best Value, Least Cost, Core and Best for Environment and Society. Our Appendix 6 and the Main Technical Report will be updated to include these in our WRMP v3.	Please see Appendix 6.
I10.4. Least cost plan clarity. In its revised draft plan, South West Water does not provide the list of options that is selected by its least cost plan. This information is present in its planning tables. However, the information may be indigestible by customers and stakeholders.	We will ensure greater clarity is provided on the components of each of the programmes we consider within our WRMP. Additional details will be included in Appendix 6 in our WRMP v3.	Please see Appendix 6.
I10.5. Clarity on programme comparison. In addition to Improvement 9.4, South West Water has not provided a clear comparison between its programmes. From its narrative it is unclear which options change between the plans. This information is present in its planning tables, but information in this format may be indigestible to customers and other stakeholders.	We will ensure greater clarity is provided on the components of each of the programmes we consider within our WRMP. Additional details will be included in Appendix 6 in our WRMP v3.	Please see Appendix 6.
I11.13. Feasible options Natural Capital. Section 8.3 of the WRMP guidance lists the NC information that should be provided for each option. Table 4 of the WRMP planning tables provides companies with space to capture NC provided by each option. However, for many of the feasible options in this table, the NC fields are filled in as "TBC".	Natural Capital assessments have been completed for all feasible options where relevant and available, as part of completing our updated Strategic Environmental Assessment, Appendix 7, due for publication in January 2024. This information will be provided in our WRMP v3 Tables (Table 4).	Table 4, and updated Appendix 7 due for publication in January 2024.

Improvement 12: Amend inaccurate and contradictory text within the plan. I12.1 Consistency of licence reduction figures. In Appendix 1 Section 4.5.3, South West Water sets out its longer-term sustainability reductions. There appears to be some inconsistency with the sustainability reduction values. The revised licence reduction figures in Table 11 plus the licence cap daily rate loss in Table 11, do not add up to the licence reduction in Table 13. As an example, the river Dart daily rate loss of 3.0 Ml/d from Table 11 plus the revised licence reduction of 16.99 Ml/d in Table 11, is less than the licence reduction of 25 Ml/d.	There is a mix of information between licence reductions and WAFU reductions and we may not have provided the clarity of description needed to undertstand this. For example on the River Dart, a 25 Ml/d loss on licence equates to a 20 Ml/d loss in WAFU due to the conjunctive use of sources - meaning it is not a one to one impact. We attribute the licence cap daily rate loss of 3.01 Ml/d to a one to one impact on WAFU and attribute the remainder impact to ED at 16.99 Ml/d (i.e. 20 - 3.01 = 16.99). We will provide greater clarity and explaination on how we present the information on sustainability reductions in our WRMP v3.	Please see Appendix 1 Section 4.
I12.2. Inconsistency in Bournemouth sustainability reduction figures. In Section 5.4.3 of the main report, South West Water state there is a peak use licence reduction at Knapp Mill of 6.65 Ml/d. However, section 5.4.6 states the reduction is to 7.65 Ml/d.	The correct figure is 7.65 Ml/d. We will ensure this is corrected and consistent throughout our WRMP v3.	Please see our Main Technical Report Section 5.4.3.
I12.3. Option clarity. In Appendix 4, Section 4.4, there are options in the table which are either screened out or on hold, but quoted as being delivered during AMP7 and will form part of the baseline for WRMP24, for example ROA10. It is confusing how options can be screened out or on hold but will be delivered in AMP7. Also, Chapter 3, Section 3.2.1 - Green Recovery: Roadford Pumped-Storage Scheme states that “Gatherley phase 2 is selected in preferred plan from 2032 onwards.” Meanwhile, the company has said that they were not going ahead with this option.	Options such as ROA10 were added to our unconstrained list at the start of the WRMP24 planning process. However, this and other options have been accelerated into AMP7 delivery so can no longer be taken forward in the WRMP process because they are part of the baseline. We will seek to improve the clarity of section 4.4. This is an error in section 3 and 3.1 and will be updated.	Please see Appendix 4 - section 4.4 & Chapter 3, Section 3.2.1
I12.4. Actions during the 2022 drought. Appendix 9 states that during the drought, South West Water followed its Defra approved drought plan to mitigate the impacts of low rainfall and the extreme heat. The company had to use supply-side options earlier than anticipated in its drought plan and had to make use of 'more before 4 options', even though drought level 4 was not reached. Also, in the Executive Summary on page 6, South West Water stated that "The combination of supply and demand pressures resulted in a situation in our Colliford WRZ more extreme than the current WRMP19 1-in-200-year design condition. " This still makes it sound as if the drought was more extreme than a 1:200 year event	We will review and clarify this for the WRMP v3.	Please see our Main Technical Report

I12.5. Inconsistency in Bournemouth and Colliford zones water demand. Page 44 says that "Our Bournemouth and Colliford zones are vulnerable to increased demand for water in the summer and we have created a peak week critical period scenario for each of these zones". This seems to contradict page 32 which says [for the Colliford WRZ] the "DYAA average is, therefore, considered the appropriate planning forecast".	We will review and clarify this for the WRMP v3.	Please see our Main Technical Report

ID Reference: R03	**Natural England (all SEA related comments and responses are found in the Addendum to the SEA SOR)**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
1.1.2 Outstanding Option Assessment and Statement of Response. South West Water note that thirty-five new supply and drought options have been identified through the revised draft planning process, twenty-nine of which should be subject to environmental assessment as part of the dWRMP. They advise however, that due to time constraints the environmental assessment of these options was not completed before submission for consultation. Of these outstanding options, seven are noted as being included within the Best Value Plan (Annexe 2, Appendix H, Table 43.1), and are therefore of material consideration to the final plan.	The environmental assessments for all the new supply and drought options in Annex H, Table 43.1 of WRMP v2 are now complete and will be provided alongside this Statement of Response. Note one of these options DR1 - Lyd to Roadford Jan-Mar has been removed as this is part of the baseline.	Please see Section 4.3 of Appendix 7, the SEA, due for publication in January 2024.
1.1.2 In lieu of a complete assessment, a 'High Level Screening' for each option has been provided, detailing the potential for positive and negative impacts across the range of Strategic Environmental Assessment topics. Whilst we welcome the strategic level of detail provided, it is disappointing that South West Water have failed in their statutory duty as Competent Authority by submitting a consultation before the full scheme of options presented within have been fully assessed – particularly where those options are to be included within the Preferred or Best Value Plans.	Noted. The environmental assessments for the new options included in WRMP v2 will be provided with alongside this Statement of Response.	Please see Section 4.3 of Appendix 7, the SEA, due for publication in January 2024.
1.1.2 It is the advice of Natural England therefore, that we are unable to provide a full and complete assessment of the revised dWRMP, as the environmental assessment and plan itself are incomplete. - "…at this stage, the WRMP24's compatibility with the statutory protection	Noted. The environmental assessments for the new options included in WRMP v2 will be provided alongside this Statement of Response.	Please see Section 4.3 of Appendix 7, the SEA, due for

afforded to Habitats Sites cannot be confirmed as some supply options have not been assessed." (pg 2, Annexe 2, Appendix H)		publication in January 2024.
1.1.2 Natural England advise that the Statement of Response is an unacceptable method for delivering the 'final' draft version of the WRMP as it does not provide a statutory means of consultation. Furthermore, we are concerned that the proposed third draft of the dWRMP, submitted as nonstatutory consultation, will be available for comment for a very short period of time over a national holiday, with South West Water proposing to publish their final plan in January. Natural England are not confident that the plan can be made compatible with the Habitats Regulations in this time, and therefore our objection to the final plan is likely.	This SoR sets out our response to the points raised during the second public consultation. We will be publishing our WRMP v3 in early 2024. The SEA Environmental Report - Revision I (Dec 2023) has been updated to reflect the updated dWRMP24 submission, which was consulted upon in autumn 2023.	See our Revised Appendix 7, due for publication in January 2024, which aligns with our draft WRMP published in October 2023.
1.1.8 River Camel Special Area of Conservation - Option COL2. We welcome the removal of this option from the Preferred Plan, however we remain concerned that this option is retained for delivery under AMP7 investment (Chapter 3.2.3, Main Technical Report) This option seeks to install a new abstraction, associated weir, eel screen and pipeline on the River Camel at Nanstallon, extracting up to 90Ml/d during high flows for treatment at Restormel WTW. A new abstraction license would be sought for this option. We welcome the increased level of information provided with this iteration of the HRA, and recognise that the conclusions made are based on the preliminary desktop assessment of the most contemporary data, and that the potential for a change in assessment conclusion is anticipated with further modelling. In anticipation of further environmental assessment of this option therefore, we take this opportunity to echo our comments from our May 2023 dWRMP response - as there are existing remedies to remove structures and reduce abstraction in the River Camel SAC, Natural England would be minded to object to any option which prevents recovery of the site to its conservation objectives. No detail has yet been provided regarding the size or scale of the proposed weir associated with this option, however we advise again that we would consider a new weir of any size to have a likely negative impact on the designated site, with the potential to lead to further deterioration of the overall condition SSSI and further undermine the achievement of the conservation objectives of the SAC.	This is an error and it will be removed from the Main Technical Report. This option was screened out before we arrived at our constrained list of options because of the need for further development of the option to determine if it is sustainable in the longer term given the SAC status. We welcome your advice on taking the scheme through further tests of the Habitats Regulations if this option is to be progressed. Please also see the SEA SoR.	Please see our Main Technical Report - Section 3: Setting the Scene, and Appendix 4, section 5.11 and the SoR for the SEA.

Further echoing our comments from our previous response to the dWRMP, Natural England question the decision to increase abstraction in a SAC river designated for Atlantic Salmon, as a method to achieve a more naturalised flow for Salmon in a heavily modified water body (St Neot stream GB108048007640). Again, Natural England advise that South West Water should either drop the scheme, or go through the further tests of the Habitats Regulations, including assessment of alternatives. Please refer to Annex 2 where the legislative tests are set out for ease of reference.		
1.3 Water Framework Directive Assessment. Comments on WFD are a matter for the Environment Agency.	Thank you.	
1.4 Assessment against wider Water Resource Planning Guidance expectations 1.4.1 Relationship to the West Country Regional Plan Natural England is concerned that neither the Environmental Destination set out in the South West Water revised dWRMP or the West Country Water Resources Regional Plan are sufficiently robust with demonstrable deliverability to ensure compliance with the Water Company environmental obligations set out in Annex 2. Where a Water Company is relying on the Environmental Destination of the relevant Regional Plan it must satisfy itself that these environmental obligations are met (see also sections 1.1 above). In Natural England's view, the South West Water revised dWRMP as currently written must be amended to address these shortcomings. We recognise that supply-demand assessments within the Regional Plan and revised dWRMP have utilised national Environment Agency modelling outputs. However, we cannot see how these ensure sufficient water within anything other than very long, multi-decadal timeframes to meet the conservation objectives of the River Avon SAC. We note for instance that to address a supply demand deficit in the Bournemouth Water area that rises to c100 Ml/d by 2050, the revised dWRMP is overwhelmingly reliant on options in the Regional Plan. Of all the supply options taken forward in the revised dWRMP for this supply area, only 5 Ml/d of yield appears to be reasonably secure for the company to rely on in the short term (before 2035), and these options do not appear to provide much flexibility for abstraction reduction on the River Avon SAC, especially with added demand from development	Our Environmental Destination was developed further from the original National Framework assessment through West Country Water Resources to translate high level impacts to site and catchment specific abstraction reductions. Our assessment follows the methods set out in the EA's Water Resource Planning Guidelines and the reductions we have included in our WRMP go beyond those originally outlined via the National Framework. Our options assessment process has identified a number of options in the Bournemouth WRZ to support the delivery of our Environmental Destination through abstraction reductions on the Hampshire Avon and River Stour. The Bournemouth WRZ constitutes only the Hampshire Avon and River Stour which therefore necessitates long transfers of water or novel solutions such as aquifer storage recovery and effluent reuse which typically have long leads times and inherent uncertainty. Our current Bournemouth WRZ programme utilises all constrained options which we recognise carries significant uncertainty. We continue to work with WCWR to identify new options and have ongoing work on existing feasible options with a view to progress these to our constrained options going forward. Through the AMP8 WINEP programme we will seek to identify the scale of the impacts and the mitigation measures that can be undertaken until we can implement longer term water resource solutions.	Please see Appendix 6, Best Value Decision Making Methodology

growth and an EA licence reduction of 12 Ml/d on the River Stour in 2028. Supply options need to be brought forward to robustly address the situation on the River Avon SAC and elsewhere in the future for the restoration of non-European SSSI rivers and wetland SSSIs and priority wetland habitats. They need to demonstrate deliverability in timeframes that meet government targets and commitments in the Environmental Improvement Plan (EIP). If this is shown not to be reasonably possible, pending removal of adverse pressures from water resource management, the revised dWRMP should link to proposals that will contribute to recovery or increase of impacted features elsewhere. Species obligations and newer obligations from the EiP should also be included within the Environmental Destination. The South West Water revised dWRMP must include a pathway to meet the Company's nature recovery obligations in line with duties and timetables in Annex 2, which necessitates the need to be specific about locations, the scale of water resource required, and the deliverability and scale of measures to provide necessary water for the environment. We do appreciate that the assessment we are requesting above is complex, and that it needs to involve other Competent Authorities, stakeholders and partners. We also recognise that PR24 WINEP provides an opportunity for companies to further investigate the above obligations in terms of their Environmental Destination. However, established problems with designated sites must be addressed as a matter of urgency (see 1.1 and 1.2 of this Annex). Uncertainties around the water requirements to satisfy Environmental Destination needs as described earlier in this Annex (and summarised again in Annex 2) need to be reflected in supply-demand conclusions.		
1.4.2 Connecting people with nature – demand management. We note and support the array of demand-side measures proposed in the dWRMP.	Thank you	
1.4.3 Options taken forward in the dWRMP The delivery of the Preferred, or Best Value Plan, relies on the delivery both AMP7 schemes as well as for some options, the assumption that post-publication environmental assessments can ensure that they will have no negative environmental impact, or that their impact will be	Drought options form part of our Wimbleball WRZ Best Value Programme from 2025 until 2035. The drought permits provide up to 8.6 Ml/d per year during a drought year. The benefits of Cheddar 2 Reservoir coming online in 2035 will enable us to remove the drought options and deliver our Environmental Destination in the River Exe catchment. We have a limited number of alternative supply schemes	Please refer to our updated Appendix 6 and our Main Technical Report

able to be mitigated for. Natural England are concerned that the dWRMP places an over reliance on drought option supply as a means with which to mitigate delays in delivering a sustainable water supply. While drought actions may be necessary in emergency, a robust water resources management plan should go beyond reactive measures, considering long-term sustainability and environmental impact. Drought licenses are not considered best practise as a means of water resources management – they are short-term solutions that focus on immediate human need, which hold a greater risk of broader impacts on ecosystems, habitats and aquatic environments.	available in the Wimbleball WRZ which all have relatively small Deployable Outputs and do not provide water to our strategic water treatment works in the WRZ meaning that any new resource cannot be easily shared to provide benefit across the WRZ. In our other WRZs we do not include drought permit options in our Best Value Plan. We will ensure our best value plan and other plan-alternatives clarify the need for the use of drought options. Please refer to our updated Appendix 6 and Main Technical Report.	

ID Reference: R04	**Ofwat**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
PCC. South West Water is not proposing to meet its performance commitment level (PCL) for PCC set by Ofwat at the 2019 Price Review (PR19). Between 2024-25 and 2029-30 the company is proposing to reach a 7.7% 3-year average reduction (2019-20 baseline) which represents a reduction level of 1.5% beyond the PR19 PCL. The company does not indicate delivery of the interim 2037-38 122 l/h/d target but does identify delivery of the 2049-50 100 l/h/d target. The company is currently under investigation relating to the accuracy of information reported by the company for its performance on leakage and per capita consumption (PCC), and our feedback here may change depending on the outcome of this investigation.	We will include further narrative around our decision making process, specifically around the different demand-strategies assessed as part of optimising our best-value plan. Through this process we have looked at achieving different levels of HH and NHH demand-reduction, to evidence the proposed targets achieved in our best value plan. This will be included in Appendix 6.	Please see Appendix 6
Leakage. South West Water proposes to reduce leakage by 50.2% (from 2017-18 baseline) by 2049-50, which meets the long-term reduction target of 50% reduction. Delivery of this level is forecast to reduce leakage to 12.9% of distribution input (DI). In addition to the long term targets, the company's proposes a reduction in leakage of 13.6% for 2025-30 (from the 2019-20 baseline). The company is currently under investigation relating to the accuracy of information reported by the company for its performance on leakage	We await further feedback following the investigation.	N/A

and per capita consumption (PCC), and our feedback here may change depending on the outcome of this investigation.		
Business demand. Revised draft WRMP will not meet the NHH government target of 9% reduction by 2037-38 and 15% reduction by 2049-50. South West Water forecasts it will achieve 7% reduction of NHH consumption by 2037-38 and 10% reduction by 2049-50. South West Water state that this is because there are not enough available non-household initiatives to deliver the magnitude of reduction required.	We will include further narrative around our decision making process, specifically around the different demand-strategies assessed as part of optimising our best-value plan. Through this process we have looked at acheiving different levels of HH and NHH demand-reduction, to evidence the proposed targets achieved in our best value plan. This will be included in Appendix 6.	Please see Appendix 6
Assessment of water needs. The revised draft WRMP increases South West Water's scale of need in the medium-term compared to the draft WRMP. This appears to be driven by a decrease in the company's water available for use (WAFU). Specifically, the revised draft company level annual average supply/demand balance baseline shows a deficit of -17.04 Ml/d by 2030 and -98.60 Ml/d by 2040, an increase from the -12.25 Ml/d and -72.20 Ml/d stated in the draft WRMP respectively. The end of the planning period in 2050, the supply/demand balance deficit is stated as -130.47 Ml/d in the revised draft WRMP, reduced from -156.45 Ml/d in the draft WRMP. Following from this change in need, the total enhancement expenditure presented in the revised draft WRMP table 8 has increased to £312m from £220m.	Following consultation feedback on our draft WRMP we have updated both supply and demand forecasts and our headroom assessment which has led to a change in the baseline supply-demand balances. In our supply forecasts we have worked with the Environment Agency to review and incorporate Licence Capping assumptions in our draft WRMP which were absent in our original draft WRMP. We have also reviewed our Environmental Destination assumptions which now includes the River Exe, River Fowey and River Stour which were previously absent in our draft WRMP. In our demand forecasts we have moved to local plan based forecasts. We have also reviewed on dry year profiles. Both of which has increased the overall level of demand in our WRZs. The consequence of these is that WAFU has reduced and demand has increased. Our headroom assessment has been updated and is now significantly lower than our draft WRMP in all WRZs. However the overall supply-demand balance has increased as noted in this consultation response. The increased expenditure sits across both demand and supply options in our Best Value Plan. We have fully revised our demand program in order to meet government targets. There are a number of new supply schemes, most notably Cheddar 2 in the Wimbleball WRZ to meet the larger supply-demand deficit here. We will ensure our WRMP v3 provides clarity on the changes that have occurred during the development of our WRMP24. We will provide further detail and evidence on the various programs we consider within our WRMP.	Please see our Main Technical Report for a more detailed explanation. Appendix 6 provides the programme evaluation.

Assessment of water needs. South West Water stated in the draft WRMP that improvements were made to the distribution system of its Roadford water resource zone (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. Risks and monitoring steps were not detailed or presented in the revised draft WRMP.	We will outline a monitoring plan in our WRMP v3 to ensure that this intergrity of Roadford WRZ is maintained.	Please see Appendix 6.
Options to meet water need. South West Water's revised draft WRMP tables indicate 44 feasible supply options have been identified, from which 11 preferred options have been selected, providing 63.35 Ml/d water available for use (WAFU) benefit. This benefit is similar to the 62.88 Ml/d provided by 18 preferred supply options in the revised draft. It is difficult to understand from the revised draft WRMP tables how many demand options have been selected and are contributing WAFU benefits. This is due to the number of sub-options and options overlapping different water resource zones and time periods. It is therefore difficult to determine how South West Water's optioneering process has changed as a result of updated forecast supply/demand deficits across its water resource zones. It is unclear how its new demand strategy and new supply options, such as Cheddar Two, have been selected in the revised draft WRMP to better address its currently forecast challenges. South West Water has indicated that a substantial number of feasible options were eliminated due to planning constraints, primarily attributed to environmental impact considerations and ongoing WINEP investigations. Our analysis of WRMP Table 4 suggests this relates to 27 options being eliminated due to environmental concerns.	We will provide more details about how our optioneering and preferred options have changed between draft and final plan. We will consider the use of the current Bristol surplus at a regional level through the WCWR regional group. This will take into account the future needs of Wessex Water in different future scenarios, the risk of not realising demand reduction benefits and the risk of deviating to a more adverse pathway.	Please see Appendix 4 & Appendix 6
Decision making and prioritisation. As part of its adaptive planning process, South West Water developed medium and high adaptive pathway which set out supply and demand options needed to manage the supply demand balance should different futures of demand or supply forecasts play out. The medium and high pathways introduce four and three additional supply options respectively. The plan specifies a decision point for these options in 2027. However, it is not clear why these options were selected or the reason behind the 2027 decision point.	We will provide greater clarity on our adaptive plan pathways and the associated monitoring plan in our WRMP v3.	Please see Appendix 6.

Decision making and prioritisation. South West Water also included a high adaptive pathway based on testing the plan against combined scenarios. However, it is not clear which scenarios were combined and the results from combining these scenarios	We are currently undertaking additional work in anticipation of this feedback to ensure we consider both individual and in combination scenarios when we assess a range of programmes (for example, Best Value, Least Cost). This will allow specific reference to the individual common reference scenarios. Our Appendix 6 and the Main Technical Report will be updated to include these in our WRMP v3.	Please see Appendix 6.
Decision making and prioritisation. South West Water indicates that the least cost and best value plans in its revised draft WRMP are identical due to constraints on options available, particularly abstraction reduction constraints. While the company mentions environmental impact and AMP8 WINEP investigations as factors leading to the exclusion of some options, there are instances where options are omitted without clear justification in the plan.	We are currently undertaking additional work in anticipation of this feedback to ensure we consider alternative programmes within our plan. This will include as a minimum Best Value, Least Cost, Core and Best for Environment and Society. We will ensure a full comparative assessment provides justification for our final preferred program.. Our Appendix 6 and the Main Technical Report will be updated to include these in our WRMP v3.	Please see Appendix 6 and our Main Technical Report.
Long term best value programme. The plan includes a comparison of the best value and alternative plans based on the best value metrics. However, the plan lacks a clear comparison of the cost and benefits associated with the proposed plans	We are currently undertaking additional work in anticipation of this feedback to ensure we consider alternative programmes within our plan. This will include as a minimum Best Value, Least Cost, Core and Best for Environment and Society. We will ensure a full comparative assessment provides justification for our final preferred program. Our Appendix 6 and the main technical report will be updated to include these in our WRMP v3.	Please see Appendix 6 and our Main Technical Report.
Demand management ambition and outcomes: South West Water should include more detailed insights into the specific trade-offs weighed in the planning process, particularly in relation to the delivery of the demand targets. This additional clarity would enhance understanding of the decision-making process.	We will include further narrative around our decision making process, specifically around the different demand-strategies assessed as part of optimising our best-value plan. This will be included in Appendix 6.	For more information please see Appendix 6: Best Value Methodology
Assessment of water needs: South West Water should provide sufficient and convincing evidence to show that it has robustly tested the sensitivity for the date to meet 1 in 500 year drought resilience. This should include presenting the costs, benefits and impact on the selection of preferred schemes of choosing alternative dates including a test of delivery in 2050.	We are currently undertaking additional work in anticipation of this feedback to ensure we meet these requirements. In our WRMP v3 we will present a discussion on the benefits.	Please see Appendix 6.

Options to meet water needs: In the final plan, South West Water should include sufficient detail on the third party options considered and the screening criteria used so that details are in accordance with water resources planning guidance (Environment Agency, Natural Resources Wales, Ofwat (2023) Water resources planning guideline).	We will clarify the feasible third party demand and supply options assessed as part of our WRMP, in Appendix 4 and 5. Some narrative is already included, and WRMP Table 4 does highlight the third party options included - we will make this clearer in our Appendices.	Please see Appendix 4 & Appendix 5
Decision making and prioritisation. South West Water should provide clear explanations of the changes in the adaptive planning process, including the reasons behind the exclusion of the primary pathways in the revised plan and what, if anything, has replaced primary pathways in the revised plan.	We are unsure of the reference to a ""Primary Pathway"" and did not include this terminology in our dWRMP or our revised dWRMP. In our WRMP v3 we will ensure that there is a full description and explanation that supports our choice of adaptive pathways.	Please see Appendix 6.
Decision making and prioritisation: South West Water should include quantifying the impact on demand of the low and high scenarios for climate change, demand, and abstraction reductions across the planning period. The company should also quantify the estimated impact on the expenditure requirement of: • planning based on the high scenarios for climate change, demand, and abstraction reductions, and the slower scenario for technology; • planning based on the low scenarios for climate change, demand, and abstraction reductions, and the faster scenario for technology.	We are currently undertaking additional work in anticipation of this feedback to ensure we consider both individual and in combination scenarios when we assess a range of programs (e.g. Best Value, Least Cost). This will allow specific reference to the individual common reference scenarios. Our Appendix 6 and the Main Technical Report will be updated to include these in our WRMP v3.	Please see Appendix 6.

3. Other Organisations

ID Reference: S01	Cornwall County Council	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
The updated version of the Plan has many improvements, especially around addressing leakage.	Thank you. Controlling leakage is an essential part of our demand management plan. Please see section 9.1 of our Main Technical Report.	Please see section 9.1 of our main Technical Report.
However, I wonder if the approach is aggressive enough given the very real prospect of drought. There are very broad timescales and more detail on timescales would be useful given the droughts we have already experienced.	Understanding the risks and issues arising from climate change, particularly the increasing pressures on our water supplies, are key aspects of our WRMP. These challenges are discussed in section 3 of our Main Technical Report. In our WRMP, we set out how, from 2025, we are working towards resilience to a 1 in 500-year drought event so that we can maintain a resilient water supply for our customers whilst maintaining sustainable levels of abstraction from our water sources. This is discussed in Section 5 and supported by Appendix 1 (Supply Forecast). We have also published 'Lessons from the 2022 drought as Appendix 9.	For more information please see our Main Technical Report, Section 5, Appendix 1 on Supply Forecasting, and Appendix 9 on the Lessons from the 2022 drought.
Your approach to developing the WRMP has been adequate and has engaged a range of stakeholders. It could have been improved with wider comms to the general public. There needs to be much stronger communication from SW water in terms of explaining the need to reduce consumption as it is not currently reaching the majority of Cornwall. More communications needs to be embedded strongly.	We have endeavoured to engage fully and openly with all our customers and other stakeholders in developing this WRMP. Feedback from customers and stakeholders is the principle reason why we fully revised our initial draft WRMP following our first consultation in the Spring of 2023 and then consulted again on our revised draft in October 2023. Details of the ways we engaged with customers and other stakeholders is given in section 3.5 of our Main Technical Report, supported by Appendix 8.	For more information please see Section 3.5 of out Main Technical Report, and Appendix 8 on Stakeholder and Customer Engagement.
Investment in the infrastructure to protect and enhance the environment is important and maybe not emphasised enough in the plan.	We agree. The amount of funding that will be available to us for future infrastructure investment to protect and enhance the environment will be determined by Ofwat, our economic regulator, as part of the 5-yearly Price Review process. Our Best Value Plan incorporates and costs the needs of the environment alongside the requirements to	For more information please see Main Technical Report - Section 8: Decision Making Process

	meet the future needs of our customers. Our decision making process is explained further in section 8 of our Main Technical Report.	
It is not clear if desalination is a viable option given the investment required.	Our approach to identifying our Best Value Plan from all viable options, including desalination at suitable locations, is explained fully in Appendix 4. Where desalination is shown to be the best value option, it will be our preferred option no matter the investment required.	For more information please see Appendix 4: Supply Options
The Plan seems to strike the right balance between supply and demand and represents best value only if timelines are adhered to, especially regarding leakage.	Controlling leakage is an essential part of our Demand Management Plan. We are required to achieve our targets of a 50% reduction in leakage from 2017/18 baseline by 2050, with interim targets of 20% by March 2027 and 30% by March 2031. Please see section 9.1 of our Main Technical Report.	For more information please see Main Technical Report - Section 9: Demand Management Plan

ID Reference: S02	**Westcountry Rivers Trust**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
Based upon the data and modelling used, your approach to water resources management over the next 25 years would be seen as appropriate and measured, although it still lacks ambition and the regulators criticised SWW's modelling stating "it is disappointing that this [fully stochastic water resource model] technical capability has not been developed for WRMP24 given the future water resource challenges in the West Country". SWW need to leap-frog and upgrade all of their modelling tools across all plans/functions to ensure they are planning with the best data and evidence possible - otherwise the approach to water resources management over the next 25 years may be wholly inappropriate and inadequate.	Recent planning guidance has changed, increasing the complexity of the planning process through changes including stochastic analysis. We have had limited time to develop the more complex methods required to meet these guidelines and deliver, in parallel, the work required for WRMP24. While we have sought to meet many of these requirements as possible, we acknowledge that there are improvments to be made for WRMP29 and beyond.	For more information please see Main Technical Report - Section 11: Next Steps
Your approach to developing your Best Value Plan is much better explained in the new dWRMP, however, again there is a lack of proposed broadening and (co)development of the 'best value' approach based on limitations of the existing approach. Also a distinct lack of consideration of supply chain issues: + Lack of proposed cross-service supply chain integration and resulting efficiencies. This is not surprising given the dWRMP focuses on collaboration and partnerships	Our full intention is to co-create and co-deliver solutions with partner organisations wherever possible. We will review the way our business operates to ensure we facilitate and enable partnership working as we approach delivery of the environmental protection and enhancement schemes set out in the WRMP.	Please see Appendix 8 for details of how we have engaged stakeholders and customers in the

with environmental/nature recovery-focused organisations. Yet the DWMP has moved to an Engineering Concept Team and is looking to form an “alliance hub” (bringing together past Alliance models and AMP7 Design and Build framework involving SWW/Bristol Water and partners). It seems the Engineering Directorate and engineering delivery will continue to dominate, where there could and should be far more scope for inter/transdisciplinary working and delivery. + In the dWRMP Consultation Statement of Response, the regulators requested "stronger emphasis on wider catchment and nature-based solutions is needed" - consequently, SWW need to plan to upskill all aspects of their business, from modelling to messaging, with this in mind as these approaches require very different tools and expertise - not sure this comes across in the dWRMP or the Business Plan other than "South West Water’s supply chain has also been challenged to bring forward a range of collaborative and nature-based solutions, and to set out their relevant skills and expertise, as they consider and respond to our call for framework contacts.		development of the WRMP.
There is a lack of emphasis on the potential cross-system benefits of urban water harvesting/reuse and NBS and SuDS - these tackle quantity, quality, biodiversity and reuse but have yet to be seen by SWW as an integrated approach and their multiple benefits are not recognised by the disjointed WRMP/DWMP/other modelling and planning frameworks. Table 25 in the dWRMP states the option assessment criteria but there are no criteria representing cross-plan benefits, circularity or regenerative benefits.	We acknowledge your point, and recognise that we need to work towards a full integrated water-cycle management approach over time across our region and sector. This will however take time, to build the required relationships, understanding and data to make this approach possible.	Appendix 5 - future pilots and trials.
We welcome the focus in section 9.3, specifically 9.3.1 on reuse and recycling of water, including RainShare. This section and Table 31 (preferred programme of household water efficiency measures) mentions the RainShare scheme. WRT would love to collaborate with SWW and councils on rolling this out in more places (to date two trial projects have been undertaken by WRT).	We note this opportunity and will be keen to discuss potential locations with the Westcountry Rivers Trust.	For more information please see Appendix 5: Demand Options
Additionally, on urban water harvesting/reuse/SuDS, with nearly 19 million people living in houses or bungalows and with nearly 16 million owner-occupied dwellings nationally and a high percentage of owned or shared ownership homes in the South West, not approaching urban land owners in the same way as farmers or rural/country/estate land owners, despite the additional logistics that might be required for interventions with this group, seems highly remis in a county that is	We acknowledge your point, and recognise that we need to work towards a full integrated water-cycle management approach over time across our region and sector. This will however take time, to build the required relationships, understanding and data to make this approach possible. We remain committed to actively identifying opportunities	Appendix 5 - future pilots and trials.

struggling with too much runoff and sewage and not enough water resources for supply. Stating "We will develop more water recycling proposals in future iterations of the WRMP" does not go far enough and does not recognise the links between water harvesting/reuse and NBS/SuDS.	for recycling, rainwater-harvesting and non-potable supply opportunities, as discussed in Appendix 5.	
Additionally, it is not clear how the statement at the beginning of the dWRMP is backed up by planned action throughout the main technical report "We will also seek to maximise opportunities across both plans…**" is a welcome improvement on the first dWRMP but still does not go far enough given the knowledge, evidence, research, tools and technology available to SWW alongside the collaborative governance, community and co-development opportunities that are banging down SWW's door. Table 27 mentions 'urban surface water' but does not define what this means thus is presumably urban river abstractions. In the same way that Section 7.5 mentions 'Innovation Option: Water Net Gain' , an urban equivalent of this should be seriously considered and collaboratively scoped. **"Drainage and Wastewater Management Plan (DWMP): Our DWMP considers the future pressures on our wastewater treatment works and networks over a 25-year period and identifies solutions. Both our DWMP and WRMP use the same planning assumptions for growth forecasts and climate change scenarios. The same principle of pro-active stakeholder engagement to co-create positive outcomes for the environment and our customers will be used in delivering both our DWMP and WRMP. We will also seek to maximise opportunities across both plans, for example options for water recycling and reuse to help close the WRMP supply-demand deficit and reduce pressure on our wastewater network at the same time.")	We acknowledge your point, and recognise that we need to work towards a full integrated water-cycle management approach over time across our region and sector. This will however take time, to build the required relationships, understanding and data to make this approach possible. We remain committed to actively identifying opportunities for recycling, rainwater-harvesting and non-potable supply opportunities, as discussed in Appendix 5.	Appendix 5 - future pilots and trials.
There is too much emphasis on simplistic water efficiency campaigning, which has returned limited benefits - Ofwat's proposed Water Efficiency Fund should help with this but thinking needs to be much more joined up - there is a lack of proposed integrated customer messaging and communication (instead what is proposed is disjointed and limited to one topic or another e.g. water efficiency, unflushables, flooding) - needs to be much more joined up/cross-themed within SWW to engage/enable integrated long-term behaviour change. This applies to both HH and NHH customers. There other solutions and broader approaches to water efficiency campaigns, including social	We are committed to actively looking for ways to incentivise customer behavioural change and produce joined-up customer messaging and communication. Our water efficiency programme focusses on water-use audits, in combination with a range of other inititatives including tariff trials, installation of flow-regulators to reduce water-wastage, rainwater harvesting and wider incentive schemes. The installation of smart meters and flow-regulators to reduce wasteage (a 10yr programme), will be instrumental in helping us target and understand water useage better, we believe this is a key enabler to driving long-term behavioural change.	Appendix 5 discusses the further pilots and trials currently planned. Appendix 6, will include a more detailed summary of our best-value demand-strategy.

practice theory and theories beyond simplistic rational choice behaviour change which should be considered.	We will continue to carry out further research and pilots looking at broader approaches to driving water-efficiency behaviour. We will work with developers to ensure that water efficient devices are installed and non-potable use in new homes is maximised. We are also actively engaging with retailers and businesses to identify water-reuse, rainwater harvesting and non-potable supply opportunities.	
The validity of the blend of drought options set out in the Plan depends on the validity of the data and modelling, which is questionable.	Understanding the risks and issues arising from drought and climate change, particularly the increasing pressures on our water supplies, are key aspects of our WRMP. These challenges are discussed in section 3 of our Main Technical Report. Our role in maintaining a resilient water supply for our customers whilst maintaining sustainable levels of abstraction from our water sources is discussed in Section 5 and supported by Appendix 1, supply forecast. Our drought plans, along with our response to the 2022 Drought, are discussed in Appendix 9, Lessons from the 2022 Drought.	For more information please see Appendix 9: Lessons From 2022 Drought
Future scenarios that could be considered may emerge through the use of updated data and stochastic WR modelling, plus some additional climate/environmental scenarios based on wider use of NFM/NBS/SuDS/rainwater harvesting/water reuse/water replacement etc.	We take uncertainty into account for a number of future scenarios using an Adaptive Planning approach to our decision making. While we have sought to meet as many of the complex needs of our future planning process as possible, we acknowledge that there are improvements to be made for WRMP29 and beyond. These are explained further in section 8.7 of our Main Technical Report.	Main Technical Report Section 8.7.

ID Reference: S03	**WildFish (SEA related comments and responses are found in the Addendum to the SEA SoR)**	
Feedback	**South West Water Response**	**For more detail in our revised WRMP**
1. Failure to protect the River Avon SAC Under the Conservation of Habitats and Species Regulations 2017, South West Water is required to have solutions in place to protect the River Avon Special Area of Conservation (SAC) as soon as practicable. WildFish believes that South West Water's latest draft Water Resources Management Plan (dWRMP) fails to meet its requirements under the 2017 regulations.	Our WRMP outlines our approach to improving the Sustainable Abstraction position for the River Avon SAC. In short term we have worked the the Environment Agency and Natural England to agree a reduction in our overall licenced abstarction from 2025. Our longer term Environmental Destination requires up to a further 85 Ml/d of abstraction reduction. Due to the size of the abstraction reduction a substantial number of supply schemes are needed in addition to the demand side program we have in place to reduce overall. Our plan sets out the earliest we can deliver the supply schemes that are available to us from our constrained options list. We	For more information please see Appendix 7: SEA Report

	have ongoing work for further scoping and refinement of options in Bournemouth WRZ.	
In its first draft Water Resources Management Plan (dWRMP) South West Water stated that it overabstracts more than 100 million litres every day from the lower Avon. To meet the requirements under the Water Resources Planning Guidelines and the 2017 regulations, South West Water is required to find alternative water supply/demand solutions for every abstraction reduction its makes on the Avon. This is to ensure that the water company maintains a water supply and demand balance. 1a) Table 41 -In its revised draft (main technical report), South West Water attempts to cover this complex water resource issue in a single table (Table 41) and fails to follow it up with any further detail or breakdown. South West Water's abstraction reduction on the lower Avon poses the biggest threat to its water supply and demand balance - no other reductions come close. To cover its management of this issue in a single table is highly inadequate and fails to appropriately inform customers and local stakeholders of the massive challenge South West Water faces in this region.	We outline our commitment to achieving Sustainable Abstraction in section 5.4.3. of our Main Technical Report with further details in Appendix 1 Section 4.3. These sections set out the scale of, and reasons for, abstractions reductions that are required on the River Avon to protect the flows and environment of the SAC. Table 41 sets out the timings of Environmental Destination abstractions reductions we can currently meet based on our current list of constrained options. Note that Table 41 is currently incorrectly labelled and includes all Bournemouth WRZ reductions (River Avon, RIver Stour and Stanbridge Groundwater). We acknowledge the scale of the challenge we face in the Bournemouth WRZ. We have ongoing work to identify options that may be available sooner and/or to compliment the options in our current WRMP.	Please see our Main Technical Report, section 5.4.3 and Appendix 1.
WildFish strongly urges South West Water to publish supplementary information outlining how the company intends to maintain supply in this water resource zone whilst also making the reductions to its abstraction on the Avon. Without adequate detail WildFish is unable to fully assess South West Water's management approach to reducing abstraction on the Lower Avon. WildFish's comments below are based on the limited information provided. The supply benefit to South West Water from 'Poole Harbour water re-use' in 2035 varies considerably within the revised dWRMP. - 6.25Ml/d (pg.12) - 12.5Ml/d (pg.158) - 25Ml/d (Table 41) - 30Ml/d - with 10Ml/d available to BNM during critical periods (pg.120). Understanding how this solution works is already challenging as it is a joint venture with Wessex Water. That said, an external contact has informed WildFish that South West Water will be taking 100% of the	We acknowledge that we have not used consistent figures thoughout the WRMP and will ensure that we update this in our WRMP v3. The correct figures are that the scheme provides an annual average benefit of 6.25 Ml/d and a peak (criticial period) benefit of 25 Ml/d.	Information is provided throughout our Main Technical Report.

water supply benefit from Poole Harbour water re-use. If correct, this vital information has not been included in South West Water's revised dWRMP.		
Another area of concern is South West Water's abstraction of 10Ml/d from Ibsley Lake. The lake is designated as a SSSI and the proposed abstraction has the potential to cause long-term negative effects on biodiversity – according to environmental assessments. WildFish need confirmation from Natural England that the removal of 10Ml/d from this waterbody would not degrade the protected site. The supply benefit to South West Water from 'Mendip Quarry' varies within the revised dWRMP. - 12.5 Ml/d (pg. 12) - 23 Ml/d (pg. 118) - 50Ml/d (Table 41) The main disparity is the difference in critical period benefit. It is unclear whether the critical period benefit is 50Ml/d or 46Ml/d. Mendip Quarry is another joint project with Wessex Water so WildFish assume the water supply benefit will be divided between the two companies.	We will ensure consistency in the benefit we report on Mendip Quarries in our WRMP v3. The correct figures are that the scheme provides an annual average benefit of 12.5 Ml/d and a peak (critical period) benefit of 50 Ml/d. These are the benefits to the Bournmouth WRZ.	Information is provided throughout our Main Technical Report.
1b) Will the Avon be adequately protected? South West Water has failed to provide enough information around Table 41 for WildFish to confidently determine whether South West Water has found adequate cover (via supply and demand solutions) to make its required reductions on the Avon. WildFish has asked South West Water for a breakdown of Table 41 but it refrained from doing so in its response. Therefore, WildFish is unable to determine whether South West Water's revised dWRMP abides by the Habitat Regulations 2017.	In Bournemouth WRZ we have included reductions in our abstractions from the River Avon in order to ensure that our abstraction from the River Avon is sustainable. Due to the size of the abstraction reductions there are a number of new supply schemes needed in order to enable our reductions in abstraction. We have outlined the schemes that are required and the phasings of delivery in Section 10.4.1 of our WRMP. Figure 35 shows the Final Plan supply-demand balance in our Bournemouth WRZ. The solid black line demonstrates our final supply-demand balance accounting for supply and demand options and Environmental Destination reductions in abstraction.	Please see our Main Technical Report, section 10.4.1
1d) As soon as practicable. On the information provided, WildFish does not believe that South West Water's delivery of solutions, to prevent over-abstraction on the Avon, are being implemented 'as soon as practicable'. The EA's interpretation of 'as soon as practicable' is, to implement the solution in the AMP period following the completion of an investigation that has identified the cause of the degradation.	Our options assessment process has identified a number of options in the Bournemouth WRZ to support the delivery of our Environmental Destination through abstraction reductions on the Hampshire Avon and River Stour. The Bournemouth WRZ constitutes only the Hampshire Avon and River Stour which therefore necessitates long transfers of water or novel solutions such as aquifer storage recovery and effluent reuse which typically have long leads times and inherent	Please see Appendix 6, our Best Value Descision-Making Methodology

Given the scale of the deficit, that would result from ending over-abstraction on the Avon, WildFish appreciates a final solution cannot be implemented by AMP8. That said, WildFish believes that a suite of solutions need to be implemented, beginning in AMP8, with an aim to end South West Water's overabstraction on the Avon as soon as practicably possible. Between the first draft and revised draft, South West Water added desalination plants for its Cornwall region. The same level of immediate planning and spending needs to be applied to the lower Avon. On the information provided, WildFish estimates that South West Water will be in a position to cease over-abstraction on the Avon by 2050 – we do not consider this to be 'as soon as practicable'."	uncertainty. Our current Bournemouth WRZ programme utilises all constrained options which we recognise carries significant uncertainty. We continue to work with WCWR to identify new options and have ongoing work on existing feasible options with a view to progress these to our constrained options going forward.	
1e) River Stour. The River Stour is the other major river of interest in South West Water's BNM zone and has been identified as a river at risk of deterioration. South West Water's abstraction is under EA investigation on the Stour due to the likely negative impacts its abstraction is having on the river's ecological health. As part of this, South West Water is expected to lose 12.5Ml/d in water supply from its Longham Lakes abstraction source in 2028. That is about 30% of its total water supply from this licence. There is no equivalent 'Table 41' for the River Stour. All of the water supply solutions (over the next 20 years) for South West Water's BNM zone are expected to benefit the River Avon according to Table 41. WildFish is concerned that South West Water has not appropriately factored in the water supply needs of the River Stour. South West Water mention that further abstraction reductions are planned for the Stour (pg. 84) but do not provide a breakdown of how these reductions will be met. As stated in the revised dWRMP, all of South West Water's apportioned water supply from Poole Harbour water re-use and Mendip Quarry will be transferred to the River Stour. Certainly, for the Poole solution, the water will be discharged into the Stour and flow for approximately 10km before it is abstracted at Longham Lakes - where it then enters into the supply network for BNM. Table 41 suggests the entire water supply benefit from these solutions will be (indirectly) awarded to the River Avon. If this is correct, the lower ~18km stretch of the Stour will gain no water supply benefit from either of these solutions (if both Poole Harbour and Mendip Quarry solutions are abstracted from the same point at Longham Lakes).	Our Bournemouth WRZ includes Environmental Destination abstraction reductions for the River Avon, River Stour and Stanbridge Groundwater. These are outlined in Appendix 1 Table 13. A full summary of the abstraction reductions we are assuming in Bournemouth WRZ are provided in Appendix 1 Section 4.6 and 4.6.1. Table 41 in our main report is incorrectly labelled and represents the Environmental Destination reductions for the whole WRZ and not just the River Avon. Work is ongoing to further understand the future licence conditions we would expect on the River Stour and River Avon which will help define the detail of how the phasing of our abstraction reductions will be delivered across the River Stour and River Avon.	Please see Appendix 1 and our updated Main Technical Report.

Based on the information provided in Table 41 and without any contrary information included in the revised dWRMP, WildFish suggests that the lower Stour is not expected to receive any new protection from demand management or supply solutions. This is concerning given the River Stour is under WINEP investigation and is home to migratory fish that require sustainable flows over the entire length of a river to complete their life cycles. WildFish ask that South West Water produce supplementary information for the River Stour – outlining the current level of abstraction, the estimated reductions required to achieve sustainable abstraction and the solutions required to achieve this.		
2) Drought Permit to Abstraction Licence conversion. South West Water's current WRMP was unable to manage the conditions experienced in the south west in 2022. As a result, South West Water abstracted approximately 10 billion litres of additional water from waterbodies in the south west to maintain supplies through the use of drought permits. Drought permits are short term, last ditch solutions for water companies who have failed to secure drought resilient water supplies. Drought permits can allow a water company to remove water below ecologically safe limits. Drought permits are temporary, whereas abstraction licence changes are a long-term solution. If a drought permit is approved it does not lay the foundations for a licence change. In its first dWRMP, South West Water proposed to 'convert' these drought permits into new abstraction and abstraction licence changes. South West Water referred to this proposal as capitalising on 'spare water'. WildFish criticised this approach and warned that it could set a dangerous precedent if successful. WildFish argue that there is no such thing as 'spare water' in natural systems and this conversion would likely cause ecological harm. Despite WildFish's warnings, South West Water is beginning to fast-track applications for abstraction licences on waterbodies where it had previously been granted drought permits. At a time when the public is demanding that water companies do more to protect our rivers, South West Water is looking to take even more water out of natural supplies.	We have a number of new supply schemes that we are delivering through AMP7 – some of which are at locations where drought permits were used during the 2022 drought. The licence applications are different from the drought permits and reflect a long term sustainable approach for using these sources of water. Each application is supported by an Environmental Assessment Report (EAR) and the volumes of water and licensing conditions are agreed in collaboration with the Environment Agency with full regard for the implications for the environment. Many of the new licences are for winter only abstraction, when river flows are high and therefore the abstraction is small compared with the amount of water available at the time of year.	N/A
2b) Fast-tracked AMP7 delivery. South West Water has made the decision to fast-track the application to abstract water from Hawk's	The 2022 drought highlighted that our supply system requires additional raw water resources to ensure a robust and resilient supply	Please see Appendix 9,

Tor Pit and the River Porth to be delivered before 2025. South West Water was granted drought permits on both of these waterbodies in 2022 and it is now looking to make these long-term supply solutions. By bringing the delivery of these abstraction licences forward to AMP7, South West Water will bypass having to consult on these proposals via the WRMP consultation process. WildFish finds this unacceptable given the contentious nature of new abstraction. These proposals should be subject to the full WRMP consultation process to allow customers and stakeholders to feed in to the decisionmaking process. In the current revised dWRMP, no environmental assessments have been included for the fast-tracked abstractions. It is highly frustrating that South West Water is unwilling to fast-track solutions to conserve water on the lower Avon but is able to speed-up the delivery of plans to take more water out of the environment. WildFish urges South West Water to delay the delivery of licence changes on Hawk's Tor Pit and the River Porth till AMP8 and allow for full consultation on these solutions in a newly revised dWRMP.	of water to cutomers in our Colliford WRZ. The AMP7 scheme development and delivery is to ensure we meet this requirement and we cannot delay. Each of the new licence applications is developed in line with environmental regulations including; a justification of need to explain why a licence is needed and why this represents the Best Value option at the time and an Environmental Assessment Report (EAR) which outlines a environmental risks and their mitigations. The licence applications are made to the Environment Agency who then evaluate each application and the evidence to support it. During the licence application process there will be opportunity for consultation on each licence by our customers and stakeholders.	Lessons from the 2022 drought.
2bii) River Porth. South West Water has an abstraction point and an unused, existing licence on the River Porth. It is now proposing to abstract 1.5Ml/d from the river. The River Porth was designated as a salmon 'recovering river' by CEFAS in 2022. WildFish is therefore concerned that any new abstraction could jeopardise the gradual return of a strong, healthy salmon population to the river	The River Porth and Porth Reservoir provide a good source of water to an area of our supply system that does not currently have any local water sources and receives it's supply from the River Fowey via Restormel water treatment works. Our AMP7 WINEP invesitgation highlighted that the current licences would cause high environmental impacts in its existing form. We have been undertaking additional work to identify how we can use this abstraction whilst ensuring the environment is protected. We have submitted a licence variation for the River Porth abstraction which will increase our compensation release from Porth Reservoir all year round and only allows abstraction during winter (November to March), when river flows are higher and the abstraction is small in relation to the total amount of water available in the river.	For more information please see Appendix 4: Supply Options
2c) Further abstraction licence conversion. Of the seven waterbodies South West Water were granted drought permits on in 2022, six have been selected for potential licence changes in its revised dWRMP. This concerns WildFish. WildFish would like to see South West Water investing in alternative water supply options rather than increasing its dependency on natural water supplies.	All of our supply options have SEA and HRA assessments as part of their scoping. Full regard is given to these as we then identify our constrained list of options which our outlined in Table 28 of the main report and Table 15 of Appendix 4 which provides details on the options screening process.	Please see Appendix 4 and 4.1

In its unconstrained list, South West Water propose to increase its Park Lake abstraction by 4Ml/d and River Lyd by 2Ml/d. In its feasible list, it proposes to increase its Stannon Lake abstraction by 1Ml/d and River Fowey (Restormel) by 4Ml/d	The options listed in this consultation response are not on our constrained options list and do not appear in our WRMP Best Value program.	
2ci) Park Lake. The proposed licence increase on Park Lake would increase the licence by 50%. The Lake is hydrologically connected to the Trenant Stream and Whitebarrow Downs wetland all of which are located in Cornwall AONB. The Trenant is home to populations of salmon and trout. WildFish are aware that increased abstraction on Park Lake could impact on these important habitats and species. In 2021, the Westcountry Rivers Trust's (WRT) electro fishing survey found salmon populations, in the Trenant, to be fair and trout populations to be good. In 2022, during a year of drought and South West Water's granted drought permit, both salmon and trout populations were recorded as poor. WRT also described the stream as significantly degraded with poor fish stocks – in need of drastic intervention. To maintain health fish stocks, the Tenant will require as much water as possible - particularly in years of drought – not additional abstraction from South West Water at Park Lake.	All of our supply options have SEA and HRA assessments as part of their scoping. Full regard is given to these as we then identify our constrained list of options which our outlined in Table 28 of the main report and Table 15 of Appendix 4 which provides details on the options screening process. Park Lake is not on our constrained options list and does not appear in our WRMP Best Value program.	Please see our Appendix 4 and 4.1.
2ciii) River Fowey. The River Fowey is one of the last strongholds for salmon in the UK and is already threatened by abstraction pressure. South West Water currently holds a licence to abstract a colossal 289 billion litres per year from its Restormel WTW abstraction point. WildFish urges South West Water to not only remove its 4Ml/d proposal from its revised dWRMP but to also find alternative solutions to reduce its current level of abstraction. WildFish is unsure whether South West Water's proposed increase in treatment capacity at Restormel WTW will go towards reducing its abstraction on the Fowey. If that is the case, then the proposal for a 4Ml/d abstraction licence increase, at Restormel WTW, would be a clear mismanagement of water resources. This option must be removed completely from planning tables.	We have no plans in our WRMP to increase abstraction from the River Fowey. Our Environmental Destination includes a reduction in abstraction from the River Fowey of around 12 Ml/d and we have AMP8 WINEP investigations scheduled to confirm what licence changes are required to ensure Sustainable Abstraction. The option to increase Restormel WTW capacity is to allow treatment of new water sources (e.g desalination and Blackpool Quarry), supporting future local Environmental Destination reductions.	Please see our Appendix 4 and 4.1.
2ciiii) Stannon Lake. WildFish was disappointed in the EA's decision to approve South West Water's Stannon Lake drought permit application in 2022. The application's Environmental Assessment Report notified the EA of the moderate impact the increased abstraction would have on Atlantic salmon, Brown sea trout and Bullhead during their	We are currently undertaking a groundwater investigation consent in collaboration with the Environment Agency to better understand the sustainable use of Stannon Lake going forward.	N/A

spawning stages of life. As Stannon Lake feeds the River Camel, lowered lake water levels result in lessened river flow. Despite the River Camel Valley and Tributaries' SSSI designation, South West Water was allowed to abstract an additional six million litres of water from Stannon Lake every day in drought conditions (1st April 2022 to 31st March 2023).Consequently, WildFish urges South West Water to seek an alternative solution, in order to protect the River Camel Valley and Tributaries during drought, rather than increase its abstraction in this area.		
2d) Best Value? Climate change and population growth will increase pressure on our rivers as water availability declines and water demand rises. It is the water industry's responsibility to secure alternative supply solution using the latest technology in order to protect our rivers from harm whilst securing adequate water supplies for customers. WildFish questions the inclusion of new abstraction and abstraction licence increases in South West Water's revised dWRMP. Of course, increased abstraction will offer South West Water with a quick, cheap means to increase its water supply but does it offer sustainable potential? Although assessments may find low environmental impacts now, with an ever changing climate, these impacts may become far more ecologically damaging over the next decade. Wildfish argues that investing in alternative nonnatural water resources will provide South West Water with a more long-term solution. It is important that South West Water outlines its decision-making process around the inclusion of new abstraction and abstraction licence changes and how it has determined they meet the criteria for 'best value'. WildFish strongly urges South West Water to provide this information and explain in full how abstraction increases constitute as 'best value' and not simply best economic value	We have undertaken a full SEA for the WRMP. This considers short, medium and long term impacts of all potential options. The SEA has informed our Best Value Plan. We will include further narrative in our Appendix 6 (decision making) on the environmental performance of the various plans assessed, to inform the best value plan.	Please see Appendix 7, due for publication in January 2024 and our updated Appendix 4, 4.1.
This re-consultation and the revised version of the dWRMP still does not provide enough information to enable proper responses to be made. The consultation is inadequate and is not a sound basis for the approval of the Plan.	For our WRMP, we have carefully followed all relevant and up to date guidance issued by the Government and the water industry regulators, the Environment Agency (EA), Natural England (NE), Ofwat, and the Drinking Water Inspectorate (DWI). We have used the outcome from our Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA) and other environmental assessments to inform our decision making and the selection of our 'best value plan'. More specifically, we have prepared our plan in accordance with the Environment Agency Water Resources Planning Guideline (WRPG,	Please see out Main Techncial Report and Appendix 10, Assurance

	April 2022) and in close consultation and collaboration with all our environmental and economic regulators. Our WRMP also complies with the Water Resources Management Plan (England) Direction 2022, which came into force on the 28th April 2022. This directs all water undertakers wholly or mainly in England on the contents of our WRMPs. Throughout the development of our WRMP, we have also fostered close collaboration with customers, partners and regulators. This helped us to develop a fuller understanding of future challenges relating to water needs and the potential options and solutions to the challenges while building a strong consensus on our plans and their delivery. In addition, we have employed the services of independent third-party assurance partners to assure the technical quality and the accuracy of the draft WRMP. Assurance on draft WRMP methodology and data table completion has been provided by Jacobs, SWW's Technical Auditor. Cost assurance was provided by Chandler KBS, KPMG and Jacobs. Our consultation process and Statement of Responses have also been subjected to assurance, to ensure full compliance with the WRPG, and have been undertaken in collaboration with key stakeholders and regulators.	
On the basis of the information that has been provided the current revision of the dWRMP fails to adequately protect rivers and lakes in the south west, and does not appear to comply with the 2017 Regulations. WildFish requests that South West Water publishes an updated revised dWRMP before the release of its WRMP v324. This plan should provide transparent evidence that South West Water is appropriately managing its water resources and is developing adequate protection for the waterbodies in the south west.	As we set out in our Main Technical Report, our WRMP has been developed in line with regulatory guidelines and statutory requirements under the Water Industry Act 1991 and the Government Directions 2022. The regulatory requirements and expectations for WRMP24 include national objectives set out in the EA's National Framework for Water Resources and the UK Government's Environmental Improvement Plan. Protecting and improving the environment and historic landscapes is as important to us as meeting our customers' demand for water. Where abstraction is causing, or is at risk of causing, damage to the water environment we must plan to reduce the volume of water we are permitted to take. For our WRMP, we have worked with the EA to understand which of our sources of supply are vulnerable to abstraction and used this information to develop our 'Environmental Destination' (ED). The EA ensures our abstraction is sustainable through abstraction licencing, which is how they ensure there is enough water to meet the	Please see our Main Technical Report

	future needs of both people and the environment. Our abstraction licences are based on meeting vital environmental requirements of local, national and international designated sites as well as the ambitions of the government's 25 Year Environment Plan (2018), Water Framework Directive Regulations (2017) and the Conservation of Habitats and Species Regulations (2017). Licences also take the EA's Water Industry Environment Programme (WINEP) into account. Where a risk to the environment has been identified and confirmed, we have agreed mitigation options with the EA and NE, such as licence capping, as part of the Environmental Destination	
South West Water's current plan failed to manage the conditions experienced in the south west in 2022. Over this consultation period, stakeholders and regulators must press South West Water into producing a new comprehensive plan to guarantee its plan never fails again. Rivers and lakes in the south west need plenty of water to support healthy populations of salmon, trout and other wildlife -this will only be possible with effective water resource management.	We submitted our final Drought Plan to DEFRA early in 2022 and it was subsequently approved for publication. The Drought Plan provided a strong basis for formulating our response to the challenges which arose in 2022. Throughout the period of drought, we worked hard to engage with our stakeholders, capture the lessons learnt and to put plans in place to ensure that we are resilient to future droughts up to the levels required (1-in-200 years and 1-in-500 years by 2039). This learning is summarised in Appendix 9 of our WRMP v2 and an explanation of how we have adapted our WRMP19 plan to meet these challenges and improve our baseline position for WRMP24 is included in our Main Technical report (and this will be expanded following feedback received during the consultation). As a result of this learning, we believe that our WRMP24 has been developed so as to ensure that we are able to meet the demand for water over the next 25 years, while protecting the environment and also being resilient to a drought with an annual probability of occurrence of 0.2% (commonly referred to as the '1 in 500 year' level of drought resilience) by 2039 at the latest.	For more information please see Appendix 9: Lessons From 2022 Drought

ID Reference: S06	National Trust
	Comments and responses are found in the Addendum to the Statement of Response to the SEA

ID Reference: S07	**Totnes Town Council**

Feedback	South West Water Response	For more detail in our revised WRMP
Totnes Town Council welcome South West Water's detailed and transparent answers to the initial consultation responses and view as them as a great example of positive engagement and transparency in consultation practice. We recognise that a number of our concerns fall beyond your remit, but we thank you for your candour and the references for further reading on these matters. We are hearted to hear that you are proactively working towards a Biodiversity Net Gain baseline, and lobbying for improved foul water separation, surface water attenuation, and grey waste recycling measures in new developments.	We thank you for your support and note your comments.	N/A
The Council acknowledges that the problem of waste water pollution is outside the remit of this specific management plan consultation, but remains concerned about the current situation of discharges of untreated waste into the River Dart which is unacceptable from both a health and biodiversity perspective. The Council looks forward to hearing SWW's plans to bring the swiftest possible resolution of this issue.	We thank you for your support and note your comments.	N/A

4. Consumer Representatives

ID Reference: S04	Waterwise	
Feedback	**South West Water Response**	**For more detail in our revised dWRMP**
We are very pleased to see that the revised plan has included a table (table 30 page 153) detailing the UK Water Efficiency Strategy to 2030 and the actions and alignment your plan has with the strategy. It is good to be able to see how these align. For the final plan it would be good to review this table and ensure the comments are aligned with the appropriate objective. For example the comment in the table next to objective 6 seems more aligned with objective 4?	We will review table 30 page 153, and ensure alignment between objectives and actions.	Please see our Main Technical Report
In the first consultation we had recommended using the opportunity of engagement on the plans to promote and signpost readers to South West Water's existing water efficiency information. The statement of response agreed this idea was a good one, but it is unclear that this has been taken forward in the revised plan? We would suggest a simple message of "no need to wait to start saving water - find out more here" and a link to your water efficiency webpages could be added to page 4 of the summary document, and/or with the 'Next steps' section.	Thank you for your feedback. We will add signposts within our WRMP v3 to our existing campaigns, "Save Every Drop", "Every Drip Every Drop" on our SWW website.	Please see our Main Technical Report
We are very pleased to see that the revised plan now includes ambitions to install smart meters to all smaller non-household customers by 2035. We would still like to see a clear diagram or table to show where your current metering levels are at and where you intend to get to during the plan. In particular it would be useful to understand what level of usage constitutes a 'smaller non-household customer' and what percentage of your non-household customer base is this? The technical document would benefit from some graphs to visual your metering programme more clearly.	We will include additional narrative in Appendix 6, setting out further detail on the demand strategy by WRZ including our metering strategy. We will add information in on current and planned meter penetration, and what percentage of these will be smart meters. We have c. 59,700 existing NHH meters which are 20mm diameter or less, out of a total of c 70,000 metered NHH customers. We have specifically picked this size of NHH connection because we are able to use the same metering technology as our planned domestic meters, which drives economies of scale and efficiency during deployment. NHH connections of this diameter will supply customers with an annual consumption of up to circa 30,000 m3/yr.	Further detail will be provided in Appendix 6, on the detailed demand-side strategy.
The intention to use the metering programme as an opportunity to also install flow regulator devices to also reduce water waste is welcome. As you will be working DMA by DMA this is also a great opportunity to really engage with the community within which you are	We are currently developing our fully integrated delivery approach to maximise the benefits from our metering, flow regulator and water-efficiency initiatives through this targeted approach, and will provide	For more information please see Main Technical Report - Section 9:

working to ensure they are fully empowered to save water as the new meters are installed	further information on this in our update Appendix 6, and Technical Report (Section 9)	Demand Management Plan

ID Reference: S05	**Consumer Council for Water**	
Feedback	**South West Water Response**	**For more detail in our revised dWRMP**
2. The layout of the plan is logical and the appendices clearly labelled. We do still feel the plan could be further enhanced by linking the reader to the more detailed content such as research documents, or things like the water efficiency fund webpage, so the reader can easily reference the source material for themselves.	We will include further cross referencing to supporting appendices and technical reports, where relevant.	Please see our Main Technical Report
Demand-side 5. In response to the original plan we supported South West Water's intention to install smart AMI type meters across its regions, saying we would welcome more information on how the information is made available to consumers, which will be pivotal in ensuring they are both 3 useable and useful to people, which is ultimately how behaviours will change and demand will reduce. The dWRMP2 has further detail on the benefits and intentions with smart meters, although not yet on how people will access the information on a day to day basis. However, when read in conjunction with the PR24 Business Plan, it is clear that South West Water will be trialling things such as innovative (progressive) charges, to help people see the benefit of their new AMI meter, so we assume this to be a work in progress and look forward to working with the company as their thinking develops in these areas.	Through our meter and flow regulator installation programme, we will look to issue wider communications to customers to help them understand the benefits of smart metering, and how they will be able to access their water-consumption data. We are looking at ways to carry out water-audits and install water-efficiency devices at the same time as meter-installs, as part of an integrated delivery approach. We will use the meter data, to help inform customer behavioural nudges through our customer billing, and will contact customers if we notice any unusual water-consumption which might be as a result of a potential leak. We are also looking to use our meter roll-out to support trials of progressive charging and other potential customer incentive schemes, such as green-redeem. The future pilots and demand-side option-trials are discussed in more detail in our Appendix 5.	Appendix 5 (pilots and trials)
Supply-side 6. South West Water explains its plans to recycle water, looking at returning clean, treated water from WWTWs to the network. We noted in response to the first plan that we know from other schemes that have considered water recycling this can be a challenging concept for customers to understand and can face considerable opposition. The engagement needed with customers for them to fully understand the concept of water recycling and so recognise it as an acceptable supply-side solution will need to be	We recogise and welcome the opportunity to work in partnership to develop water recycling where appropriate.	For more information please see Appendix 8: Stakeholder and Customer Engagement

robust. We look forward to working with South West Water on its communication and engagement strategy around this work.		
7. We are pleased to see the desalination scheme at Par, supporting the Colliford WRZ has firmer details in the dWRMP2, with regard to its timing, capacity and how it fits with the overall supply side plan. We would like to see robust evidence of customer engagement on desalination, as whilst it plays a part in resilience it does not seem to be a preferred option for them. Consideration should also be given to how the scheme visually looks in the landscape, to make it more acceptable to the local community similar to the wastewater plant in Lyme Regis, which is not noticeable, and may therefore allay some concerns.	A programme of public enagagement and consultation is in progress for the current Par desalination project which is in accelerated delivery. It is also going through the planning process which will enable the local community to comment on the proposed plans. A comprehensive programme of customer engagement and research has been carried out to support the development of the WRMP.	Main Technical Report Section 3.5.1
9. We asked how South West Water planned to target the role out of smart meters; how South West Water will prioritise and target NHH customers – perhaps starting with long unread / unloadable meters, then highest users? We note the dWRMP2 explains business efficiency visits will be targeted based on high potential for water savings and through detailed analysis of Market Operators Services Limited (MOSL) data, and following liaison with water retailers. From this we infer that the roll out of smart metering will be targeted using the same methodology, but would like this made explicit.	A wide range of factors will be used to prioritise the roll-out of smart meters to our HH and NHH customers. We will be deploying all smart meters on a DMA by DMA basis, because a street-by-street deployment is both cost-effective and enables us to provide consistent customer-communications and messaging. We will look to prioritise DMAs based on that DMA's performance; this will include considerations around areas with the greatest opportunity for water-saving such as targeting leakage and reductions in water consumption. Wherever feasible, we will use information on the locations of NHH long-unreads and unloadable meters to inform this prioritisation process. Further more granular information will be included in our Appendix 6, to explain our chosen NHH demand strategy.	Please refer to our update Appendix 6 for more detail on our chosen demand strategy for NHH customers.