

Draft Water Resources Management Plan

Statement of Response to the second public consultation

January 2024



Introduction

We produced our initial draft (version 1) Water Resources Management Plan 2024 (WRMP24) for public consultation between 14 February and 9 May 2023. We developed this version (v1) by working with a wide range of stakeholders with interests in, and responsibilities for, water management and the environment, and by listening to our customers' priorities. Following feedback from the initial consultation, we significantly revised our WRMP24 v1 and published a further version (v2), in October 2023.

This report is our Statement of Response (SoR) to the public consultation on v2 of the WRMP24. The second consultation ran for 8 weeks between 11 October and 06 December 2023. We thank all our customers and stakeholders for the constructive feedback they provided on the v2 draft.

The consultation provided an opportunity for customers and stakeholders to review our revised proposals for managing water resources supply and demand across our region and how this may affect them. This Statement of Response summarises the comments we received on our WRMP24 v2 and provides an overview of how our WRMP will change as a result.

Having considered the feedback from all of our stakeholders and customers as referred to in the Appendix to this Statement of Response, a version 3 of our WRMP24 will be formally published in the spring of 2024 embodying our responses set out in the Appendix to this Statement of Response.

Table 1: version numbers, publication and consultation dates for the WRMP

Version	Date published	Consultation date	SoR published
v1	February 2023	February - May 2023	September 2023
v2	October 2023	October – December 2023	January 2024
v3	Spring 2024 (tbc)	N/A	N/A

Our consultation on the WRMP v2 closed at midnight on 06 December 2023. We received a few late responses but have included these in this Statement of Response as all responses are highly important to us and to the production of the WRMP24.

A total of 17 responses were received to the second consultation. We collated these into four groups: customers, regulators, other organisations and consumer representative organisations. The Appendix sets out our responses to the individual issues and concerns raised. Meanwhile, conversations with our stakeholders are continuing as we move towards producing v3 of our WRMP24 in 2024.

Strategic Environmental Assessment

We also produced a draft Strategic Environmental Assessment (SEA) of our WRMP24 and we consulted on this at the same time that we consulted on v1 of the WRMP. The Environment Agency, Historic England, Natural England and the Westcountry Rivers Trust responded to the SEA consultation.

Our draft SEA and its Statement of Response to the feedback from the consultation are published on the WRMP page of our website at: [WRMP](#).

Our revised dWRMP v2 - Statement of Response

Although we only consulted once on our SEA, some stakeholders including the Environment Agency, Historic England, Natural England, the National Trust and Wildfish used the opportunity of the second WRMP consultation to provide further comments on the SEA. Our responses to this second round of comments are published as an addendum to the SEA SoR.

Background

Water Resources Management Plans (WRMPs) are produced as part of a statutory process under the Water Act 2003. This requires all water companies to produce a WRMP every five years, setting out how the future demand for water from customers, communities, businesses and all other stakeholders will be met whilst also meeting the needs of the environment. The WRMP must also comply with the Water Resources Management Plan (England) Direction 2017, which came into force on 22nd April 2017.

In developing our WRMP24, we followed the revised 'Water Resources Planning Guideline' (WRPG) issued jointly by the Environment Agency (our environmental regulator) and by Ofwat (the water industry economic regulator), which was last updated in April 2023.

The legislation requires customers and stakeholders to inform the development of the WRMP by being involved in, and consulted on, each of stage of its development. Our WRMP24 sets out how, with the active participation of our customers, businesses, other stakeholders and water retailers, we propose to ensure that there is a sufficient water supply to meet future demand across our entire region over the 25-year planning period from 2025 to 2050.

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

Alignment of our WRMP24 with our PR24 Business Plan

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

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

Having considered the feedback from all our stakeholders and customers as referred to in the Appendix to this Statement of Response, we believe that our chosen best value plan (WRMP) published in October 2023 remains robust and represents best value and will not change in our updated draft plan due for publication in 2024. For this reason, the WRMP elements of our Business Plan submission to Ofwat are unchanged following this consultation process. Having said that, from the feedback received in this second consultation process, we recognise we must provide further evidence and justification to support aspects of our chosen plan.

Why we revised our initial draft WRMP

Although the proposals set out in v1 of our WRMP24 had received wide support, the feedback told us these needed to be underpinned by more evidence regarding the issues and solutions proposed. Further details were also needed on how we had reached our conclusions that our draft plan would provide 'best value' for our customers, communities, and the environment. We were also told that the structure was difficult to follow. Our regulators agreed that the plan should be redrafted and restructured, and that it should be followed by a second public consultation.

We submitted the WRMP24 v2 to the Secretary of State for the Environment in early October 2023. Following approval, it was published for a second public consultation in October through to early December. This Statement of Response provides a summary of all the responses received, and its Appendix sets out, line-by-line, the feedback received and our specific responses to it.

Overview of responses

The feedback from the consultation identified eight broad themes, which are summarised in Table 1. The responses received are grouped under four categories: customers, regulators, other organisations and consumer representative bodies.

The substantive actionable issues raised in this consultation are recorded in the Appendix to this Statement of Response.

Note: Names of individuals have been removed for confidentiality.

Table 1: Summary of feedback from the second draft WRMP24 consultation.

Key themes	Specific areas
Supply baseline	<p>Providing clarity on the assumptions and delivery timescales of AMP7 supply schemes in Colliford, Roadford and Isles of Scilly WRZs.</p> <p>Environmental Destination assumptions both in the near term through licence capping and in the longer term under climate change.</p>
Demand baseline and headroom	<p>Further clarity on baseline assumptions, particularly associated with the existing options included in the demand -baseline.</p> <p>Providing confidence in delivery against our current AMP7 demand targets.</p>
Supply and Demand options	<p>Expanding the information and narrative of all feasible options, and how these have been shortlisted. (Full SEA's, WRMP Table 4 data complete, carbon methodologies, and information on option uncertainty)</p>
Decision making process	<ul style="list-style-type: none"> • Better evidencing how we arrived at our best value plan. • Assessing further plan-alternatives. • Describing all plan-alternatives, including a comprehensive comparison and full description of their benefits and overall performance • Further information on how we have considered uncertainty in our decision-making and further challenge on our best-value adaptive pathways.
Our Chosen Demand strategy	<p>Further detail on the composition and timing at both water company and water resource zone level, of our chosen metering, leakage, non-household and household water efficiency strategies.</p> <p>Further information on targeting, deployment and prioritisation of each component of the demand strategy.</p>
Our Chosen Supply Strategy	<p>Further evidence on the inclusion of Cheddar 2, considering the regional position in the next WCWRG plan. Justification of why there are not yet additional supply options in Bournemouth, allowing quicker reductions in abstraction on the Hampshire Avon.</p>
Strategic Environmental Assessment	<ul style="list-style-type: none"> • Our stakeholders have correctly noted that our environmental assessments were incomplete within our 2 October 2023 submission. We have now completed these assessments in our Appendix 7 published on 20 Dec 2023. • Environmental assessment of our feasible options and, the cumulative effects of the Plan-alternatives assessed including our chosen best value plan, are now complete.
Other	<p>Setting out how the dWRMP will align with the updated WCWRG plan, and planned updates to the drought plan. Further aligning drought actions in WRMP with 2022 drought response.</p>

Graphic shows the main themes we received feedback on from each consultee.

	Decision Making / Best Value	Demand reduction	Water Efficiency / Strategy	Leakage	NHH Demand	Metering	Consultation Process	SEA / Habitat Regs	Environment (general)	Climate Change	Drought / Resilience	Adaptive Planning	Collaboration/ plan alignment	Desalination	Supply Sources/Abstraction	Supply / Demand Balance
Customers																
6 Customers	✓			✓			✓	✓	✓		✓	✓				✓
Regulatory																
Environment Agency	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓
Historic England	✓							✓	✓							✓
Natural England	✓						✓	✓	✓				✓	✓		
Ofwat	✓		✓	✓	✓						✓					✓
Other Organisations																
Cornwall CC				✓			✓			✓	✓	✓		✓	✓	
National Trust								✓	✓							
Totnes Town Council							✓									
Westcountry Rivers Trust	✓	✓	✓						✓		✓	✓	✓			
Wildfish	✓						✓	✓	✓		✓	✓		✓	✓	✓
Consumer Reps																
CCW			✓			✓								✓	✓	
Waterwise		✓	✓			✓										

1.1 Desalination in Cornwall

We also received 18 responses to the consultation relating specifically to the desalination project at Par in Cornwall. The scheme at Par is being undertaken in our current investment programme, 2020-2025.

We are currently consulting on the proposals and have a series of public briefings and meetings underway to discuss the project with our customers and stakeholders.

More details of our plans are available on our website at: <https://www.southwestwater.co.uk/about-us/what-we-do/improving-your-service/projects-and-investment/desalination>.

We have forwarded all responses received about the Par desalination scheme to the project team working on it. They will take all concerns raised into account as the detailed planning progresses. We have not included these responses in our Statement of Response as the scheme precedes the WRMP24 planning period which is effective from 2025 onwards.

Next Steps

We have considered the consultation responses received on our v2 WRMP24 and are updating our plan in line with our responses to feedback set out in the Appendix to this Statement of Response.

Our v3 WRMP24 will take account of all the comments received as set out in:

- This Statement of Response and the Appendix
- The revisions made following the consultation on the West Country Regional Plan, also due to be published in 2024.

Following the publication of this Statement of Response, an v3 WRMP will be issued in 2024 and reviewed by the Secretary of State for the Department for Environment, Food and Rural Affairs (Defra) who will decide whether it should be published without further amendments. We anticipate receiving permission to publish the final plan early in 2024.

We will continue to work closely with the Environment Agency and other key stakeholders as we update our plan to ensure that they can be confident their feedback is considered.

Outputs from our revised plan have been used to inform our PR24 Business Plan which has been submitted to Ofwat. The determination of our PR24 Business Plan will inform our AMP8 delivery programme, starting in April 2025 and continuing to March 2030.

Our plans for co-creating and co-delivering our WRMP

We know that the long-term sustainability of any plan and success of its outcomes are delivered through effective ongoing engagement, co-creation and co-delivery.

Considering this, we have developed a long-term engagement strategy to ensure the conversations begun as the WRMP was developing, will continue well beyond the publication of the final Plan. We remain open to new ideas, different approaches, evolution and challenge, and will develop our future plans to reflect the input we receive.

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



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South West Water Limited, Peninsula House, Rydon Lane, Exeter EX2 7HR, Registered in England No 02366665

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