

Iain McGuffog  
By email

24<sup>th</sup> April 2023

Dear Iain,

## Re: Consultation on the draft Regional Water Resources Plan

I am writing on behalf of members of Blueprint for Water<sup>1</sup> to share with you our thoughts on the draft plan for West Country Water Resources. As you know, Blueprint members have a keen interest in securing sustainable water resources, and published our ['10 Asks' of Regional Water Resources Plans](#) in 2021. We also published a [blog](#) in February 2023 which looks at the headlines for both the draft regional and company scale water resources plans.

As national organisations we struggle to respond in detail to the five regional plan consultations and company scale dWRMPs, so instead we have undertaken reviews of both the emerging and the draft plans against these 10 asks. Our specific thoughts on the WCWR Draft Plan are set out below.

### Meeting the needs of the environment first

We want to see the regional plans prioritising the delivery and maintenance of a healthy water environment before making additional water available to abstraction for PWS, energy or other sectors. Where there is uncertainty we should adopt the government's [precautionary principle](#), ensuring the needs of the environment are being met until the evidence shows that any additional abstraction does not result in unacceptable impacts on it.

We cannot allow investigations into meeting future environmental needs to drag on beyond the next investment period (2025-30). We are therefore disappointed that the WCWR plan suggests very little action on the ground will occur prior to 2030, and will instead focus on understanding options based on BAU+. We want to see action on the ground before 2030 and decisions on further licence reductions to meet the needs of the environment need to be made by 2030.

### Delivering 20% biodiversity net gain

Whilst the plan legitimately notes that it is too early to assess what strategic Biodiversity Net Gain contributions could be made in relation to the Strategic Resource Options, we are concerned that draft best value metrics within the plan would score some schemes that deliver less than 10% and are therefore legally non-compliant. Delivery of biodiversity net gain should be critical to best value metrics; the current framing of this within the plan as 'one consideration of many' is therefore concerning. This cannot be acceptable if WCWR is to meet these legal requirements, and to make a contribution towards achieving the Environment Act to halt the decline of nature by 2030.

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<sup>1</sup> Blueprint for Water is part of [Wildlife and Countryside Link](#), a coalition of 70 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

We would hope that WCWR can show greater ambition in committing to deliver at least 20% BNG, and contributing to the recovery of nature wherever possible. For example, this could be achieved through supporting Local Nature Recovery Strategies, as set out in Water Resources East's plan.

### **Supporting the Achievement of Net Zero as soon as possible**

We are disappointed that the plan does not describe how ambitions within the Water Industry Routemap 2030 will be met.

The approach taken to scoring the carbon impacts of the options within the plan, and that these will be assessed further alongside company targets, the sector's 2030 ambition, and the Government 2050 net zero target is positive in principle. However, the plan gives no indication of how these bandings align with what is actually needed of the sector. It is welcome to see the plan acknowledging the importance of nature-based solutions for achieving net zero.

### **Supporting the delivery of national water demand reduction targets**

We have serious concerns about the framing of and approach to demand management in the plan. Currently, the WCWR plan suggests that 110 lppd PCC can be achieved through policy alone. The plan does not include a link or further appendix details for the 2019 report from which this has been concluded. We would not expect policy changes alone to deliver 110 lppd PCC; a far wider range of actions are needed to effectively reduce demand for water – for example, reducing water company network, household and non-household leakage. This framing is therefore extremely concerning.

Whilst the plan does include some water company actions to reduce water demand that are welcome, the detail is lacking. It would be helpful, for example, if Table 12 set out more clearly which companies will be rolling out which activities. The plan also appears to omit the leakage reduction plan.

We have raised concerns with the level of ambition across all the regional plans on reducing non-household PWS demand. This is an area that would benefit from improvement across all the final plans.

### **Ensuring all abstractors play their part in reducing demand**

That WCWR recommend a plan to 'increase connectivity and storage availability' for non-PWS users, starting with agriculture, is positive. However, demand reduction commitments are still limited. We want to see commitments from non-PWS sectors to reduce or optimise their demand through water use efficiency.

### **Reducing the impact of new development on water resources**

We are disappointed to see that the draft plan includes very little on reducing the impact of new development on water resources, only referencing this in relation to WCWR's support for wider demand reduction policy.

Where new water-intensive development is proposed in areas with no surplus water, or in areas classified as seriously water stressed, we want to see the regional plan committing water companies to work with developers and local authorities to reduce additional water demand. This should be in addition to measures to manage increased sewerage and wastewater from new development, including and where possible prioritising the use of nature-based solutions. The feasibility of the new development being water neutral should also be explored.

## **Delivering multiple benefits through nature-based solutions**

Nature-based solutions (NBS) can cost-effectively deliver multiple benefits, for example, reducing pollution, flood risk, and providing environmental enhancement in addition to increasing the resilience of water supplies.

The plan recognises that the consideration of these multiple benefits is required under the National Framework, and states it will achieve this in part through work in ‘focus catchments’, particularly for natural flood management. It is welcome that the plan acknowledges customer and stakeholder support for NBS. That WCWR is actively working with partners, such as through Catchment Partnerships, to explore collaboration is welcome.

However, some detail is still lacking, for example where the plan cites the WINEP as a route to NBS delivery. WCWR should aim to be as ambitious as possible, by preferentially choosing NBS options in future.

## **Working in partnership and committing to keep engaging with stakeholders**

It is positive that a range of stakeholder groups were consulted in the development of WCWR’s draft plan, and we would welcome further detail about how this stakeholder engagement and multi-sector working will continue once the plan has been published. It is also welcome to see elements of equality, diversity and inclusion being considered in the draft plan; the inclusion of intergenerational equity as a best value metric is positive, and we would encourage wider social wellbeing and equity to also be considered.

However, we have some concerns that stakeholders may struggle to meaningfully engage with the full content of the plan. The plan appears to include a number of errors that make understanding difficult in places, for example the references made to a future ‘updated draft summer 2022 plan’ within the document. These errors should be addressed before publication of the final plan.

Overall, we welcome the efforts and approach of the regional groups to date, and consider regional planning to be a significant and welcome step forward in addressing the abstraction pressures faced by our water environment.

Currently [nearly a fifth](#) of our surface waters, and over a quarter of groundwaters, do not have enough water to protect the environment and to meet the needs of fish and other aquatic life, and this situation will only worsen with climate change and increases in demand. We therefore challenge West Country Water Resources to go further to address the aspects raised in the final plan.

Very best,



Ali Morse  
Water Policy Manager, The Wildlife Trusts, and Chair, Blueprint for Water