



Dŵr Cymru
Welsh Water

Statement of Response

To draft Water Resource Management Plan 2024

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1. Executive summary

1.1. INTRODUCTION

OUR VISION

Dŵr Cymru Welsh Water provides an essential public service to over three million people across most of Wales, and adjoining parts of England. We are the sixth largest of the ten regulated water and sewerage companies in England and Wales and are unique in that we are a not-for-profit business with no shareholders. This means we are guided solely by what is in the best long-term interests of our customers and the environment.

OBJECTIVES FOR THE PLAN

The objective of our draft Water Resource Management Plan 2024 (dWRMP24) is to ensure that we will always be able to provide sufficient water supply to meet our customers' demand for water over the next 25 years by making our water supply systems resilient to drought, particularly in light of a changing climate. The Plan uses best available evidence to formulate a set of actions through analysing future risks and identifying how we might need to adapt to different future circumstances. The basis for our planning is laid out in specific Welsh Government Guiding Principles and joint regulatory guidance. These documents are built upon and are directly linked to Government and regulatory authority legislation and policy.

OUR CONSULTATION

We ran a full public consultation on our draft Plan for 14 weeks from the 16th November 2022 through to the 22nd February 2023, receiving 14 responses in total. The main report, together with the planning tables, SEA/HRA reports, and a bilingual non-technical summary were published on our website. During the consultation process we:

- Contacted over 300 organisations
- Contacted all relevant Members of the Senedd and UK Parliament
- Publicised the Plan via our Welsh Water social media
- Presented the Plan to Welsh Water's Independent Environment Advisory Panel (IEAP)
- Ran a dedicated stakeholder engagement event (online) on the 24th January 2023.

Twenty organisations were represented at the event which provided them with an opportunity to discuss in more detail our draft WRMP24 ahead of providing any formal consultation feedback. The consultation fostered meaningful stakeholder engagement, with parties including regulators, environmental organizations, local and national authorities and other groups. By involving these stakeholders, we were able to gain critical feedback and alternative perspectives that make our investment decisions more robust, better informed, and ultimately more effective in addressing complex water resources challenges.

During the period of the consultation our dedicated Draft WRMP24 webpage was viewed by over 600 individual users with our main report download 120 times, indicating there was a good level of engagement. Interestingly our webpage and Plan has continued to be accessed post the closure of our consultation, receiving another 500 unique visitors between the 23rd February and 18th June with a further 160 downloads of our Plan.

Figure 1 below gives a high-level view of the topic areas where we have received comments and representations.

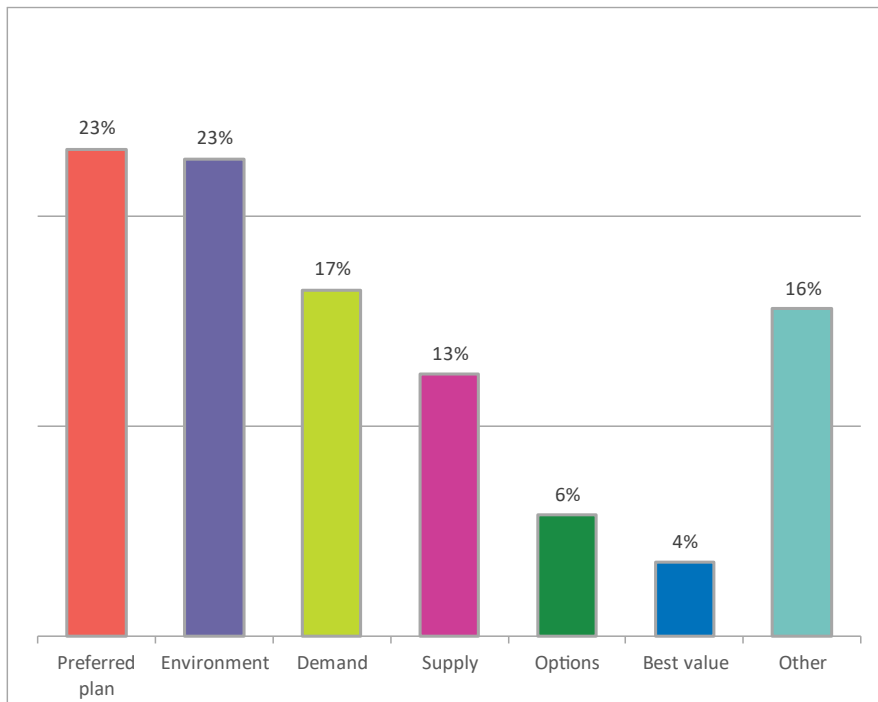


Figure 1 - Distribution of key feedback themes

OUR STATEMENT OF RESPONSE

This Statement of Response provides a summary of the feedback received during the consultation, organized according to key areas of interest, and outlines the changes that we have made in response to these. We then detail and cross-reference the consultation responses received to any changes made within the revised draft WRMP24 and the reasons for these.

The Statement of Response should be reviewed along with the revised draft WRMP24 and the associated tables and Appendices which show the amendments made. We will send this documentation to Welsh Government and our regulators who will decide on the next steps to be taken. If no, or minor details, need to be amended then we will be directed to make these prior to direction to Publish the Plan. We anticipate that this will happen in the autumn of 2023.

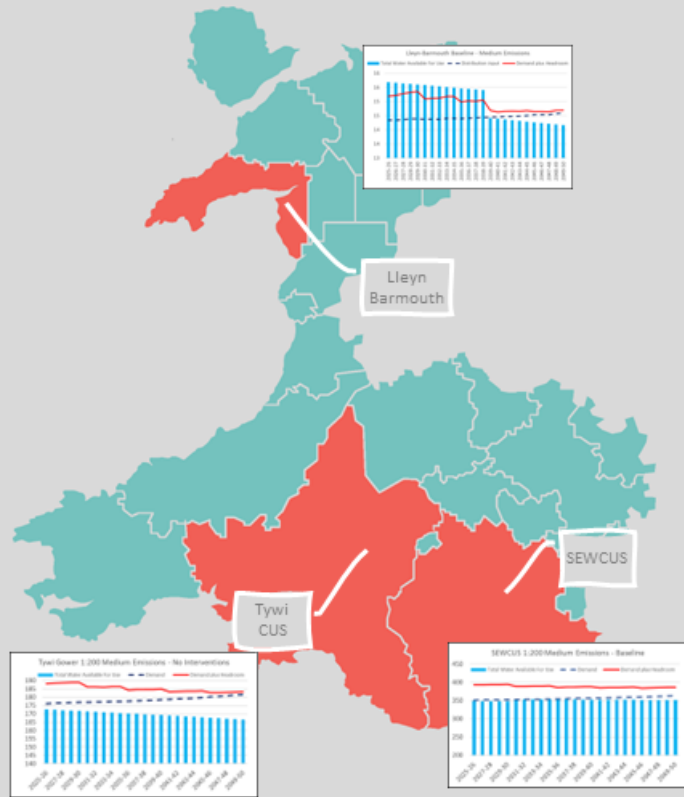
The Statement of Response has been published on our website and has been shared with those who participated in the consultation as well as with the Welsh Government and Defra.

This Statement of Response is structured as follows:

- Section 1 outlines the consultation process
- Section 2 outlines the respondents we have received feedback from
- Section 3 summarises the responses we have received
- Section 4 details a full breakdown of responses and our replies
- Section 5 outlines the changes applied to the revised draft Plan
- Section 6 outlines our concluding remarks
- Appendix A sets out further evidence and changes to the plan

A summary of our revised Draft plan is provided on the following page.

Our revised draft WRMP24



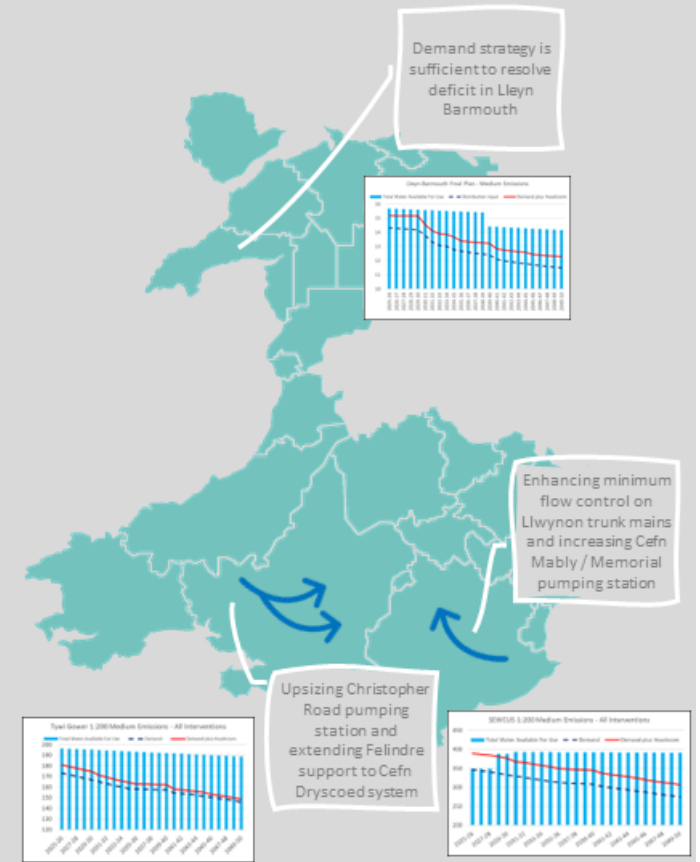
Before our interventions

Our initial supply-demand balances show that three of our twenty three water resource zones do not meet our target levels of drought resilience

Our Plan ensures that all customer demand is met, and that our supplies are resilient to a 1 in 200 year drought by 2030 and a 1 in 500 year drought by 2040

To achieve this, we will

- Halve leakage from 2017/18 levels by 2050
- Adopt a progressive metering policy to achieve 95% of properties having 'smart' meters by 2050
- Work with our customers to reduce per capita consumption to 110 litres per person per day by 2050
- Increase the capacity of our networks to move water where it is needed in the SEWCUS and Tywi Gower zones



After our interventions

2. Feedback from Respondents

14 stakeholders formally responded to our consultation including individuals, regulators and other organisations, a summary of the key themes they fed back on is provided in Table 1 below.

Stakeholder type	Entity	Major feedback themes
Government and regulators	NRW	Preferred plans for Clwyd Coastal and Mid and South Ceredigion, Deliverability of demand reductions, Enhanced ecosystem resilience
	OFWAT	Company-level supply demand balance, Clwyd Coastal, Drought resilience, Water balance, Optioneering, Adaptive pathways, Tables
	Natural England	Conservation objectives and monitoring specifications within Habitats Regulations Assessment, In-combination effects in Strategic Environmental Assessment
Environmental groups, community groups, and charities	Afonydd Cymru	Leakage and Per Capita Consumption, non-household and critical Period demands, Preferred Plan, Natural Capital Approach
	CRT	Demands and Preferred Plan in the Usk catchment
	Cadw	Impact of options on cultural heritage
	Waterwise	Demand reductions, metering strategy, Water efficiency, Preferred Plan
Consumer bodies	CCW	Communication of the plan, demand management, Leakage, Metering, Per Capita Consumption, Bill Impact
Local Authorities and National Park Authorities	Flintshire County Council	Demand forecasting, Links to wastewater and water quality
	Pembrokeshire Coast National Park Authority	Supply, Communications, 2022 Drought
Water companies and regional water resources groups	WRW	Collaboration with regional planning
Trade associations	NFU	Government policy
Businesses	Arqiva	Metering strategy, Advanced Metering Infrastructure
Other authorities	Environmental Public Health (NHS)	Vulnerable customers, environmental hazards

Table 1 - Respondents to our draft plan and major themes from feedback

3. Feedback received

3.1. Informal feedback

We commissioned Cynnal Cymru – Sustain Wales to facilitate an online engagement event to collect informal feedback on our draft Plan. The event was hosted on 24th January 2023 on Microsoft Teams and was attended by 21 consultees representing 18 organisations across a wide range of sectors including regulators, local authorities, businesses, and academia.

The event commenced with an overview of Welsh Water and our 2024 draft Water Resource Management Plan, and then moved on to three sessions covering Demand Management, Water Supply and the Preferred Plan, and Customer Engagement on WRMP and Drought of 2022. Each session comprised a presentation by a subject expert from within Welsh Water, followed by breakout sessions facilitated by Cynnal Cymru for attendees to discuss the themes.

The comments received from the participants across the three sessions have been collated below.

Session 1 - Demand Management

The approach to demand management outlined in the presentation was generally well-received across all three breakout sessions.

In terms of what was strong about the Plan

- Participants welcomed Project Cartref and the ‘you see it, we fix it’ approach, and in particular that Welsh Water had thought in advance about the additional support that customers would need to fix leaks at home.
- Participants felt that customers would be amenable to making water-saving changes and in this respect Welsh Water would be ‘pushing at an open door.’
- Participants warned that Welsh Water must be seen as ‘putting its own house in order’ before placing too many demands on consumers in terms of fixing leaks.
- Participants felt that the move towards more smart metering was sensible and would help Wales ‘catch-up’ with rates of use in England
- Participants concurred that there was scope for more voluntary reductions of water use but expressed concern about vulnerable customers and the potential for ‘water poverty’

In terms of what might be missing from the Plan:

- Participants noted that the demand management targets were very ambitious and that it was not clear what contingencies were in place if the targets were not met
- Participants felt that more detail might be needed on how to ‘sell’ the required changes to customers

In terms of what might be incorporated into the Plan:

- Participants made no explicit recommendations for additional content on this topic in the Plan

Session 2 - Supply Capability and our Preferred Plan

The approach to water supply outlined in the presentation was also generally well-received across all three breakout groups, although being more technical in nature than the first, it did not generate as much discussion or as many questions.

In terms of what was strong about the Plan:

- Several participants praised Welsh Water's efforts to construct and explain this part of the Plan. In particular, the participants were impressed by the level of detail the Welsh Water team went into to model the supply capability and to understand the risks.
- One of the participants noted a big improvement in the understanding of the hydrology and the impact it made on the modelling of the supply capability.
- Participants welcomed Welsh Water's linked up approach to supply capability i.e. that supply has not been looked at in isolation from demand and wider environmental pressures.
- One of the participants was particularly positive about the behavioural aspect of the plan and was curious to hear more about the impact of educational activities on water demand and bills.

In terms of what was missing from the Plan:

- Participants in two of the breakout sessions commented that they had expected to hear more about impacts on the natural environment and biodiversity.
- In addition, one room in particular would have liked see more around nature-based solutions.

In terms of what might be incorporated into the Plan:

- Participants expressed a wish for more information about potential impacts on biodiversity to be included within the Plan.
- Participants wanted to see more detail around potential nature-based solutions.

Session 3 - Customer engagement on WRMP and Drought 2022

There was a high level of consensus across the three breakout rooms around the quality of the customer engagement that had been undertaken. Participants were pleased to see Welsh Water putting in this significant effort to understand its customers and appeared impressed with the research approach as well as its findings.

In terms of the findings from the consumer research that participants found surprising:

- Participants from two of the breakout rooms expressed surprise at some of the insights shared by the presentation, and in particular that customers had responded so well to the campaign about water saving measures during the drought and the subsequent hosepipe ban.
- Participants suggested that the years of previous customer engagement had led to high levels of trust in Welsh Water, which in turn contributed to this positive response.
- Participants thought communication of information relating to the hosepipe ban via letters gave the campaign more gravitas than if it had been done by other media.

In terms of engaging consumers in the next year and whether anything should be done differently:

- Participants reiterated that 'Getting your own house in order' is very important to customers, particularly around leakage, which was felt to be a big issue due to its high visibility.
- Participants across the breakout rooms noted that, because customers often fear the unknown, a focus on communicating the personal benefits of change could help with implementing the Plan. Participants were aware, however, that closing the knowledge gap can be time-consuming and expensive.

- Participants suggested that engagement with social housing associations could help with the roll out of smart meters in terms of encouraging take-up and buy-in. Engagement with the Landlords Association Wales was suggested.
- Participants questioned if the research and findings that were shared focused only on domestic customers and if so, what was being done to engage other users and in particular high-users such as the Fire Service and other parts of the public sector. This suggests that some insight around this could be shared in future communications.
- Participants felt that Welsh Water should continue to showcase, to the regulators, the value of qualitative research.

3.2. Formal responses

The response to our formal consultation varied in breadth of scope and depth of technicality, according to the familiarity of the respondent with water resources planning. From the 14 responses, we have identified 225 comments. Each comment has been categorised and key themes across the comments have been drawn out. These key themes are Demand, Supply, Options, Best Value Planning, and Environment with remaining areas grouped under 'Other' themes.

These themes are discussed below, with a full record of each comment and our response provided in Chapter 6 - Detailed consultation feedback.

Demand

- The Plan should be based on the recent water balance re-statement and leakage and PCC targets are re-visited.
- Our intention to reduce demand was welcomed, but stakeholders note our high starting position and the challenge this presents, particularly over the remainder of AMP7.
- Stakeholders supported our plans to reduce leakage and per capita consumption but noted that detail was lacking on the implementation of options to achieve our targets.
- Stakeholders noted that our draft Plan did not include a strategy for the reduction of non-household demand and suggested that more information was included on the forecasting of this demand, the impact of this demand during drought, and our ambition to reduce this demand.

Supply

- Stakeholders requested more clarity in the accounting for uncertainties and potential impacts of sustainability reductions associated with Environmental Destination
- Stakeholders sought more information on Welsh Water's proposed 2025-30 National Environment Programme (NEP) investigations. Organisations also asked for further information on the benefits the Plan will deliver to biodiversity and ecosystem resilience benefit.
- Stakeholders sought confirmation that our critical period reporting covered all those zones that are vulnerable to significant peaks in demand that could outstrip our available supply capability.
- Stakeholders recognised our intention to meet a 1 in 500 resilience level by 2040, but thought that the reporting of drought resilience and our target levels of service over the planning period should be clearer.

Options

- Stakeholders expressed concern about the number of feasible options that had been considered in the draft Plan, and noted that there was scope for further consideration of Nature Based Solutions
- The types of supply options included in the preferred plan were noted and we were asked to demonstrate that the additional abstraction will be available in drought conditions.
- The level of information provided on the Water Available For Use, Total Net Present Costs, and Option Utilisation was challenged, with additional detail requested for inclusion in the final Plan.
- NRW stated that our assumed water availability for the preferred Llechryd upgrade option in the Mid & South Ceredigion zone was incorrect, meaning that it would not deliver the volume of water required.
- NRW also noted there was a risk of causing deterioration water quality to the local receiving watercourse from our preferred Llwynon gravity main option in the SEWCUS WRZ.

Best Value

- It was noted that due to potential future risks identified, then our Plan should follow an adaptive planning approach in addition to the sensitivity testing provided, with alternative pathways presented.
- Further evidence is provided on the breadth of comparative options considered and that further justification is provided on 'best value' planning to meet regional Leakage and Per Capita consumption targets.
- Improved clarity was requested on how the 'core' and 'most likely' pathways are calculated and represented in the Plan to better justify investment and allow more flexibility for future investment.
- The demonstration of best-value planning for deficit zones was noted but it was requested that the approach is expanded to cover all zones.
- Additional information was requested to help better understand our Plan and the drivers at both a zonal and company level.
- A number of queries were raised regarding the variation required to the Llechryd licence to enable the preferred plan supply-side option for M&S Ceredigion
- Consultees were positive about the approach of adopting smart metering, but additional analysis was requested for all metering and demand options, with particular attention to the costs and benefits of the proposed development of AMR compared to AMI technologies.

Environment

- Stakeholders requested extensive further environmental information around schemes, including listing of protect species, priority species, and designated sites; plans for monitoring; cumulative impacts, and; construction impacts.
- NRW also asked for further information on the benefits the Plan will deliver to biodiversity and ecosystem resilience whilst both they and Welsh Government want to see a clearer picture of the Plan's impact upon our company carbon reduction strategy.

Other themes

- The most prominent other themes that consultees commented on were requests for broader consultation and greater detail as to the content of consultee feedback, and recommendations regarding assurance of the Plan.

The following section 4. details the individual comments and representations received from each organisation and our responses to these.

4. Overview of changes applied

As per our detailed consultation feedback, the input of our stakeholders has been carefully considered and resulted in valuable updates to our draft Plan. The most significant revisions have been applied to our demand forecast and demand management strategy, our preferred plan, and adaptive planning, as follows:

4.1. Demand forecast and demand management strategy

- We have reviewed our water balance, increased our estimation of leakage and adjusted a number of other components of demand. This has increased the savings needed to achieve our planned leakage reduction by the end of AMP7 and resulted in a different starting position for our revised draft Plan.
- We have significantly expanded our demand management strategy within the Plan, providing detail on our metering delivery strategy and how it contributes to our leakage reduction strategy, as well as explanation of our AMP8 Water Efficiency Strategies for Household and Non-household customers.

4.2. Our preferred plan and options

- In addition to re-calculating our Supply Demand Balances for all zones based on our revised demand forecast, we provided more output of the extensive scenario testing undertaken for all zones, looking at the impact of higher demands, larger sustainability reductions to our abstraction licences for environmental destination, and more severe climate change pathways.
- We have removed our Mid and South Ceredigion option to increase our Llechryd Water Treatment Works as this is no longer required under our revised demand forecast.
- Our Clwyd Coastal zone is also no longer in deficit against resilience targets.
- We are now reporting that the Lleyn – Barmouth water resource zone is in deficit from 2039/40 when our drought resilience targets changes from 1 in 200 to 1 in 500 year return period. This is resolved through delivery of our demand management strategy and no other interventions are required.
- We have provided tabulated data on utilisation of our preferred supply-side options for the SEWCUS and Tywi Gower water resource zones.

4.3. Adaptive planning

- The additional schemes that will be required under the ‘Sustainable Abstraction’ and ‘Compound High’ scenarios have been identified for the zones in which our preferred plan would enter deficit, and timelines have been included to identify when investment decisions will be required along alternative pathways.

5. Our revised draft Water Resources Management Plan

We have made some substantive changes to our WRMP24 report based upon the comments and representations received. In terms of the Preferred Plan outcomes, very little has needed to be amended although we have included adaptive investment pathways in case we encounter conditions outside of our ‘most likely’ future scenario.

We have retained the same broad objectives and principles for the Plan. This is based upon Welsh Government and NRW Policy and legislation along with Ofwat's Public Value Principles which flow through to Regulatory Guidance.

Our Plan still consists of a 'Smart' metering strategy which will deliver both leakage benefits and supports our customers to manage their own demand for water alongside Government intervention around water efficiency labelling. In the longer-term we will meet challenging leakage and consumption targets through additional water demand management activity based on improved technology and behavioural science. This demand management activity will reduce the amount of water that we need to put into supply and the volumes of water taken from the environment. This in turn reduces our carbon footprint.

For zones where we do not currently meet resilience objectives, we have a best value Plan to utilise existing water resources through strategic network improvements. This means that we will not be taking additional water from the environment beyond our current permissions.

Our Preferred Plan, therefore, remains a cost effective balance between both demand and water supply measures.

We have published our revised draft Plan on our website, along with a non-technical summary, and the SEA and HRA of the plan at <https://www.dwrcymru.com/en/our-services/water/water-resources/revised-draft-water-resources-management-plan-2024>

6. Detailed consultation feedback

6.1. Feedback from government and regulators

Reference	Consultee	Feedback	DCWW reply/action
127	Natural England	For the biodiversity objective in the SEA, the SSSIs and LNRs within a certain radius of the option have been numbered while European sites have been identified. To adequately assess the impact on protected sites, SSSIs and LNRs must be individually identified in the SEA	Where appropriate, SSSIs and LNRs have been specifically named in the assessments of individual options. For example, where sites are situated within close proximity to an option (i.e. within 1km) and where sites would be directly affected by construction and/or operation of an option. Whilst it is noted that the number of such sites within 10km has been included, it is not considered appropriate/proportionate to list all sites for each option assessed.
158	Natural England	The SEA includes an 'Assessment of Secondary, Cumulative and Synergistic Effects' but lacks detail on potential in-combination effects. The in-combination/cumulative impact assessment must include more details on which plans, projects and proposals have been included and whether there is an in-combination adverse effect that requires changes to the plan i.e. mitigation, compensation and avoidance measures	Section 6.4 of the Environmental Report sets out the cumulative effects of the draft WRMP24 in-combination with other plans and programmes. This includes: <ul style="list-style-type: none"> • effects of the draft WRMP24 with other (same) water company plans – an assessment of the effects of the draft WRMP24 with DCWW's Drought Plan and Drainage and Wastewater Management Plan (DWMPs); • effects of the draft WRMP24 with adjacent water company plans and projects (SROs); • effects of the draft WRMP24 as part of the WRW draft Regional Plan; • effects of the dWRMP24 with other plans e.g., Local Plans, National Policy Statements (NPSs); • effects of the dWRMP24 with other Nationally Significant Infrastructure Projects (NSIPs).

			<p>These have been reviewed as part of the completion of the revised Environmental Report.</p>
<p>159</p>	<p>Natural England</p>	<p>It is unclear how the SEA has accounted for uncertainties in demand by variables such as growth and licence reductions. Including alternative plans in the SEA assessment would ensure demand could be met under variable future pathways</p>	<p>The comment is made on the SEA; however, it is addressed primarily through the process of DCWW’s WRMP development. Section 5.4 (‘Developing Your Supply Forecast’) of the Water Resource Planning Guideline (2023) outlines the requirements for sustainable abstraction taking into account existing statutory requirements and environmental destination. Any required licence changes are factored into the supply-deficit calculations, and NRW/EA will have confirmed that those licences that are considered valid for the planning period when the WRMP modelling is undertaken. The supply forecast informs the supply-demand balance calculations for the planning period, which is in effect the ‘predicted future baseline’ for water resources in a supply area. The water company then develops ‘options’ for resolving any predicted deficits in the supply-demand balance, which are then tested against various metrics to determine the ‘preferred plan’.</p> <p>SEA Regulation 12(2) requires the identification, description and evaluation of “the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”. For the purposes of the SEA, the revised feasible options have been considered as reasonable alternatives to the preferred options (that comprise the preferred plan). In addition, reasonable alternatives that operate at the plan level have also been</p>

			considered linked to different future pathways/scenarios, and where appropriate have been assessed in the revised draft Environmental Report.
160	Natural England	While supply and demand has been estimated up 2050 the WRMP could consider supply and demand up until 2080 to ensure long-term sustainable water supplies	We have chosen not to appraise our Plan across a longer planning period as we feel the increased uncertainty around planning to a much later timeframe does not provide benefits in terms of the short to medium term decisions, we need to make around our best value investment programme.
161	Natural England	The SEA has provided a scope of objectives which considers both negative and positive impacts. The impact of options on high value receptors such as protected sites has not been set at the appropriate severity. The scope has ranked impacts on European sites and SSSIs as moderate or low severity. Potential negative impacts on European sites before mitigation should be classified as a major negative impact and potential impacts on SSSIs and other protected sites before mitigation should be at least a moderate negative impact	<p>We disagree with the suggested approach.</p> <p>Specific guidance has been developed for what constitutes a significant (major) effect, a moderate effect, a minor effect or a neutral effect for each of the SEA objectives. These ‘definitions and thresholds of significance’ help to ensure a consistent approach to interpreting the significance of effects and helps the reader understand the decisions made by the assessor.</p> <p>In developing the definitions and thresholds of significant effects, information has been drawn from:</p> <ul style="list-style-type: none"> • the previous definitions and thresholds used in the SEAs of DCWW, SSW, STW and UUW’s WRMP19s; • suggested definitions and thresholds for assessment scoring from the All Company Working Group (ACWG) for application to the SROs; • suggested definitions and thresholds detailed in the WRSE Scoping Report, for application to the SEA of the WRSE Regional Plan; • an evaluation of the range of quantitative values (such as

yield, capex, embodied carbon, operational carbon and material quantities) available for a selection of the DCWW, STW, SSW and UUW's WRMP19 options for different option types (e.g., supply-side options such as reservoirs, transfers, boreholes, enhanced treatment);

- scoping consultation feedback;
- practical revisions made when applying the thresholds to the revised feasible option assessment.

The thresholds for significance are set out in Appendix E of the Environmental Report and were revised following responses to the scoping consultation that took place between the 8th April and the 13th May 2021

The assessment of effects includes consideration of the following:

- the nature of the potential effect (what is expected to happen);
- the timing and duration of the potential effect (e.g., short, medium or long term);
- the geographic scale of the potential effect (e.g., local, regional, national);
- the location of the potential effect (e.g., whether it affects rural or urban communities, or those in particular parts of a water company area); and
- the potential effect on vulnerable communities or sensitive sites.

Where relevant, other information and assessments including the HRA and WFD Assessment, previous

			<p>assessments (if the option is a revised WRMP19 option) and regulator/stakeholder feedback have been considered in the assessment and referenced as appropriate. Where an adverse effect on the integrity of a European site has been identified, a significant negative effect has been identified in the SEA. An adverse effect on an SSSI (taking into account its qualifying features and status) that cannot be avoided or mitigated, where identified and described, has also been assessed as a likely significant negative effect.</p> <p>It would not be appropriate now, following assessment and reporting to amend the framework, given that it would introduce inconsistencies. In consequence, no change has been made to the methodology for the determination of minor, moderate or significant positive or negative effects.</p>
162	Natural England	<p>Dwr Cymru Welsh Water have used the WRW SEA scoping report which was shared with statutory bodies. Dwr Cymru Welsh Water should have consulted Natural England on this approach, as it was expected that Dwr Cymru Welsh Water would undertake a scoping stage independently of WRW</p>	<p>WRW and the core member companies have taken an integrated approach to preparing the Regional Plan and the component WRMPs. To achieve this, WRW member water companies have used a regionally consistent set of methodologies to reflect local, regional and national needs into the development of the plans.</p> <p>This approach led, for the SEA, to the production of the WRW Regional Plan and WRMP24 SEA Scoping Report . This set out the proposed approach to undertaking the assessment of the WRW Regional Plan and WRMP24s. Appendix A of the Scoping Report set out contextual information to support the assessment of the DCWW WRMP24. The SEA approach built on an indicative outline</p>

			<p>circulated to regulators for comment on the 2nd February 2021.</p> <p>Scoping consultation on the WRW Regional Plan and WRMP24s environmental assessment methodologies took place between the 8th April and the 13th May 2021. Natural England provided a response with comments that included:</p> <ul style="list-style-type: none"> • “There is much in the Strategic Environmental Assessment (SEA) scoping report that is good and Natural England welcomes WRW’s commitment to environmental assessment.” • “Natural England applauds the very thorough consideration of plans and programmes.”
163	Natural England	For the biodiversity objective the SSSIs and LNRs within a certain radius of the option have been numbered while European sites have been identified. To adequately assess the impact on protected sites, SSSIs and LNRs must be individually identified	Where appropriate, SSSIs and LNRs have been specifically named in the assessments of individual options. For example, where sites are situated within close proximity to an option (i.e. within 1km) and where sites would be directly affected by construction and/or operation of an option. Whilst it is noted that the number of such sites within 10km has been included, it is not considered appropriate/proportionate to list all sites for each option assessed.
164	Natural England	When considering potential impacts the SEA scope has considered a geographical radius of designated and priority sites around the option as well as major hydrological pathways	Thank you for your comment.
165	Natural England	Monitoring of potential WRMP impacts on features has been considered. Further details on monitoring could be	Thank you for your comment. Where appropriate further detail regarding monitoring has been provided in the

		provided including identifying survey methodologies and a timetable of work. Identifying monitoring needed and establishing baseline conditions that the plan could impact as early as possible will allow early identification of unforeseen impacts while there is still an opportunity to mitigate them	technical annexes to the WRMP and in the revised Environmental Report.
166	Natural England	The SEA includes an 'Assessment of Secondary, Cumulative and Synergistic Effects' but lacks detail on potential in-combination effects. The in-combination/ cumulative impact assessment must include more details on which plans, projects and proposals have been included and whether there is an in-combination adverse effect that requires changes to the plan i.e. mitigation, compensation and avoidance measures	<p>Section 6.4 of the Environmental Report sets out the cumulative effects of the draft WRMP24 in-combination with other plans and programmes. This includes:</p> <ul style="list-style-type: none"> • effects of the draft WRMP24 with other (same) water company plans – an assessment of the effects of the draft WRMP24 with DCWW's Drought Plan and Drainage and Wastewater Management Plan (DWMPs); • effects of the draft WRMP24 with adjacent water company plans and projects (SROs); • effects of the draft WRMP24 as part of the WRW draft Regional Plan; • effects of the dWRMP24 with other plans e.g., Local Plans, National Policy Statements (NPSs); • effects of the dWRMP24 with other Nationally Significant Infrastructure Projects (NSIPs). <p>These have been reviewed as part of the completion of the revised Environmental Report.</p>
167	Natural England	The SEA considers potential positive impacts for all objectives and their likelihood	Thank you for your comment.
168	Natural England	Natural England is concerned that the Environmental Destination set out in the plan is not sufficiently robust to ensure compliance with SEA requirements. Where the companies dWRMP is relying on the Regional Plan SEA to	WRW are now in the process of revising the Draft Regional Plan, considering the submissions received. Where relevant, this will include a review of the Environmental Destination options. However, whilst the process of

		<p>meet its environmental obligations it must still satisfy itself that the companies environmental obligations set out in Annex 2 are met. This includes making sure that non-European SSSI rivers and wetland SSSI and priority wetland habitats have been included in the Regional Plan Environmental Destination modelling. Species obligations and newer obligations from the Environmental Improvement Plan (EiP) should also be included within the Environmental Destination. WRMPs must include a pathway to meet the company’s nature recovery obligations in line with duties and timetables in Annex 2. In Natural England’s view Dwr Cymru Welsh Water’s dWRMP as currently written must be amended to meet these obligations.</p>	<p>developing the Regional Plan has been underpinned by the development and application of an integrated and regionally consistent set of methodologies to reflect local, regional and national needs into the development of the plans, the WRW component WRMPs, such as Welsh Water's WRMP24 and the accompanying environmental assessments (such as the SEA) are not dependent on the WRW Regional Plan environmental assessments to meet relevant regulatory requirements. Where relevant, appropriate consideration has been given to the environmental obligations highlighted in Natural England's submission; however, for the revised draft WRMP24, once the revised SDB has been determined, there are no deficits identified for any of Welsh Water's WRZs located in England, and in consequence, within the context of the WRMP, interventions are focused on demand management, efficiency and leakage measures compatible with the Environmental Destination ambitions</p>
169	Natural England	Further information on SSSIs which may be impacted by options must be considered in the SEA including unit condition and protected features	Where appropriate, SSSIs and any relevant protected features and condition have been included in the assessment of individual revised preferred supply options.
169a	Natural England	Impacts on SSSIs should be at least a moderate negative impact	<p>We disagree with the suggested approach.</p> <p>Specific guidance has been developed for what constitutes a significant (major) effect, a moderate effect, a minor effect or a neutral effect for each of the SEA objectives. These ‘definitions and thresholds of significance’ help to ensure a consistent approach to interpreting the significance of effects and helps the reader understand the decisions made by the assessor.</p>

In developing the definitions and thresholds of significant effects, information has been drawn from:

- the previous definitions and thresholds used in the SEAs of DCWW, SSW, STW and UUW's WRMP19s;
- suggested definitions and thresholds for assessment scoring from the All Company Working Group (ACWG) for application to the SROs;
- suggested definitions and thresholds detailed in the WRSE Scoping Report, for application to the SEA of the WRSE Regional Plan;
- an evaluation of the range of quantitative values (such as yield, capex, embodied carbon, operational carbon and material quantities) available for a selection of the DCWW, STW, SSW and UUW's WRMP19 options for different option types (e.g., supply-side options such as reservoirs, transfers, boreholes, enhanced treatment);
- scoping consultation feedback;
- practical revisions made when applying the thresholds to the revised feasible option assessment.

The thresholds for significance are set out in Appendix E of the Environmental Report and were revised following responses to the scoping consultation that took place between the 8th April and the 13th May 2021

The assessment of effects includes consideration of the following:

- the nature of the potential effect (what is expected to happen);

- the timing and duration of the potential effect (e.g., short, medium or long term);
- the geographic scale of the potential effect (e.g., local, regional, national);
- the location of the potential effect (e.g., whether it affects rural or urban communities, or those in particular parts of a water company area); and
- the potential effect on vulnerable communities or sensitive sites.

Where relevant, other information and assessments including the HRA and WFD Assessment, previous assessments (if the option is a revised WRMP19 option) and regulator/stakeholder feedback have been considered in the assessment and referenced as appropriate. Where an adverse effect on the integrity of a European site has been identified, a significant negative effect has been identified in the SEA. An adverse effect on an SSSI (taking into account its qualifying features and status) that cannot be avoided or mitigated, where identified and described, has also been assessed as a likely significant negative effect.

It would not be appropriate now, following assessment and reporting to amend the framework, given that it would introduce inconsistencies. In consequence, no change has been made to the methodology for the determination of minor, moderate or significant positive or negative effects.

169b

Natural England

SSSIs have been included under the biodiversity SEA

We disagree with the suggested approach.

objective along with other designated and priority sites. SSSIs should have an individual objective in the SEA separate to biodiversity

The scope of the assessment was set out in the WRW Regional Plan and WRMP24 SEA Scoping Report. This included a draft assessment framework (comprising of assessment objectives and guide questions), assessment matrix and proposed threshold values used to inform a determination of significance of an effect.

This includes a specific SEA Objective 1 “To protect, restore and enhance biodiversity, including designated sites of nature conservation interest and protected habitats and species, enhance ecosystem resilience and habitat connectivity and deliver a net biodiversity gain” and supporting guide questions “Will it protect, restore and enhance where possible, the most important sites for nature conservation (e.g., internationally or nationally designated conservation sites such as SACs, SPAs, Ramsar and SSSIs)?”.

Scoping consultation on the WRW Regional Plan and WRMP24s environmental assessment methodologies took place between the 8th April and the 13th May 2021. Natural England provided a response and made no request to amend SEA Objective 1.

In consequence, assessment has been undertaken of the DCWW draft WRMP24 using the agreed revised assessment framework.

It would not be appropriate now, following assessment and reporting to amend the framework, given that it would

			introduce inconsistencies.
170	Natural England	The WRMP has assessed the impact of different options on Wye Valley, Dee Valley and Malvern hills AONBs	Comment noted.
171	Natural England	The SEA should consider their responsibilities as an S26A body under the NERC act. It is unclear how they have considered this in their SEA	<p>Comment noted.</p> <p>The Natural Environmental and Rural Communities Act 2006 placed a duty on public bodies, including water companies, to “have regard, so far as is consistent with the proper exercise of their functions, to conserve biodiversity.” Conserving biodiversity in this context includes restoring or enhancing a population or habitat. Within the context of the SEA, it has been addressed through the specific SEA Objective for biodiversity 1 “To protect, restore and enhance biodiversity, including designated sites of nature conservation interest and protected habitats and species, enhance ecosystem resilience and habitat connectivity and deliver a net biodiversity gain” and supporting guide questions</p> <ul style="list-style-type: none"> • Will it protect, restore and enhance where possible, the most important sites for nature conservation (e.g., internationally or nationally designated conservation sites such as SACs, SPAs, Ramsar and SSSIs)?” • Will it protect, restore and enhance non-designated sites and local biodiversity? • Will it provide opportunities for new terrestrial and aquatic habitat creation or restoration and/or link existing habitats as part of the development process?
172	Natural England	The WRMP considers proposals to enhance SSSI conditions such as raising the Talybont reservoir LNR to increase lake habitat	Comment noted.

173	Natural England	The dWRMP considers using nature based solutions in supply options where appropriate	Comment noted.
174	Natural England	The biodiversity SEA objective considers impacts on protected sites and priority species	Comment noted.
175	Natural England	The SEA should consider the impacts of options on priority species as is described in the SEA objectives and is required under the 2030 biodiversity targets	Comment noted.
176	Natural England	The SEA should list all the priority habitats and species they are considering within the assessment	Comment noted. Appendix D presents the baseline analysis for all the topics scoped into the SEA, including biodiversity. This includes referencing the 55 habitats and 557 species identified under Section 7 of the Environment (Wales) Act 2016, as of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales.
177	Natural England	The WRMP considers the impact of options on species abundance and extinction. The WRMP should include a list of protected and priority species that have been considered in the assessment of impact	Comment noted
178	Natural England	The WRMP should consider impacts on species abundance targets for 2030 as set out in the Environment act	Comment noted
179	Natural England	The SEA includes a water quality objective and the impact of options on water quality have been addressed in the assessment. This should be expanded on to include the impact of water quality on species abundance	Comment noted.
180	Natural England	The WRMP considers the impact of climate change resilience with SEA objectives on natural resources and climate change. The WRMP should expand this to the biodiversity SEA objective as options could impact	Comment noted. SEA Objective 2 “To protect and enhance sustainable natural resources and the ecosystem services they provide”

		habitats and species resilience to climate change	includes as an additional guide question "Will it provide opportunities for climate adaptation and protect the climate resilience of vulnerable and priority sites?" which permits consideration of the habitats and species resilience to climate change
181	Natural England	The dWRMP has considered nature based and sustainable low carbon solutions for supply options in keeping with WISER	Comment noted.
182	Natural England	The WRMP should include a commitment to use catchment based solutions when considering options as required by WISER	Comment noted. We have plans to trial nature based solutions in AMP8 to provide evidence we can use to inform our WRMP29.
183	Natural England	The dWRMP should consider if enough water is available to achieve the objectives of the England Peat Action Plan where appropriate	Comment noted.
184	Natural England	It is unclear how the SEA has accounted for uncertainties in demand by variables such as growth and licence reductions. Including alternative plans in the dWRMP would ensure demand could be met under variable future pathways	<p>Comment noted.</p> <p>The comment is made on the SEA; however, it is addressed primarily through the process of DCWW's WRMP development. Section 5.4 ('Developing Your Supply Forecast') of the Water Resource Planning Guideline (2023) outlines the requirements for sustainable abstraction taking into account existing statutory requirements and environmental destination. Any required licence changes are factored into the supply-deficit calculations, and NRW/EA will have confirmed that those licences that are considered valid for the planning period when the WRMP modelling is undertaken. The supply forecast informs the supply-demand balance calculations for the planning period, which is in effect the 'predicted future baseline' for water resources in a supply area. The water company then</p>

			<p>develops 'options' for resolving any predicted deficits in the supply-demand balance, which are then tested against various metrics to determine the 'preferred plan'.</p> <p>SEA Regulation 12(2) requires the identification, description and evaluation of "the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme". For the purposes of the SEA, the revised feasible options have been considered as reasonable alternatives to the preferred options (that comprise the preferred plan). In addition, reasonable alternatives that operate at the plan level have also been considered linked to different future pathways/scenarios, and where appropriate have been assessed in the revised draft Environmental Report.</p>
185	Natural England	<p>The SEA assesses the impacts of options in the feasible list which consists of options in the preferred plan and alternatives considered. The SEA should include alternative plans to demonstrate the reasons for selecting the preferred plan</p>	<p>Comment noted.</p> <p>SEA Regulation 12(2) requires the identification, description and evaluation of "the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme". For the purposes of the SEA, the revised feasible options have been considered as reasonable alternatives to the preferred options (that comprise the preferred plan). In addition, reasonable alternatives that operate at the plan level have also been considered linked to different future pathways/scenarios,</p>

			and where appropriate have been assessed in the revised draft Environmental Report.
28	Natural England	The HRA has listed the qualifying features of the site but must also consider the conservation objectives and monitoring specifications. The HRA must assess whether the plan is meeting those objectives for each protected feature of the European site	Comment noted. The conservation objectives and monitoring specifications are considered in the HRA, as stated in the method.
116	Natural England	The HRA has identified European sites that could be impacted by the dWRMP within 20KM of development sites. At the appropriate assessment stage the features and condition of these sites have been assessed in identifying all potential LSE and any mitigation required.	Comment noted.
117	Natural England	The HRA has listed the qualifying features of the site but must also consider the conservation objectives and monitoring specifications. The HRA must assess whether the plan is meeting those objectives for each protected feature of the European site	The conservation objectives and monitoring specifications are considered in the HRA, as stated in the method.
118	Natural England	At the appropriate assessment stage an cumulative and in combination impacts assessment has been included where potential in-combination effects with drought plans, other water company plans and national infrastructure projects have been considered. However LPA projects should also be included in the in-combination effects. While the details of minor projects is acceptable at this stage more detail on the in-combination assessments should be included at the project level	Comment noted.
119	Natural England	It is unclear how the HRA accounted for uncertainties in demand by variables such as growth and licence reductions.	The HRA does not account for these directly – these aspects are fundamental to the calculation of the supply-demand balance that underpins the WRMP and option

			development, and the HRA cannot and should not attempt to replicate these calculations. Growth and licence reductions therefore form part of the predicted future baseline that the HRA is based on.
120	Natural England	While supply and demand has been estimated up to 2050 the WRMP could consider supply and demand up until 2080 to ensure long-term sustainable water supplies.	We have chosen not to appraise our Plan across a longer planning period as we feel the increased uncertainty around planning to a much later timeframe does not provide benefits in terms of the short to medium term decisions we need to make around best value investment.
224	Natural England	The WFD demonstrates no deterioration of ground water dependent terrestrial ecosystems for the preferred plan options	We have further studies planned in AMP8 for our Leintwardine groundwater source in Herefordshire, to confirm no impact from our abstraction upon the WFD status of the River Teme or otherwise. We would deliver water supply mitigation, if needed. In AMP9.
227	Natural England	Dwr Cymru Welsh Water have included the SEA scope produced by WRW in the regional plan. It is acceptable for water companies to use evidence collected in the regional plan but they must satisfy themselves that they have enough environmental information to sufficiently assess impacts and enhancements of their own plans – particularly if there are smaller, specific local issues/supply options that are not picked up at the regional scale	We have completed an individual company SEA which aligns with the methodology of the WRW SEA but is a standalone document that undertakes a robust and detailed assessment of our own Company Plan using information specific to our operating area. Of our 23 WRZs, only 7 are within the WRW Regional Plan hence our SEA assesses all relevant issues to the areas of Wales and England we supply.
228	Natural England	The Environmental Destination set out in WRW's Regional Plan, may not be sufficient to achieve Protected Area and SSSI objectives in relation to flow and abstraction. Dwr Cymru Welsh Water should consider whether existing abstractions, planned new options and/or increasing abstractions are/ will be detrimental to these protected sites. The environmental destination	Within our Final WRMP24 we are proposing to address any risks over the future long-term sustainability of our raw water sources in two ways: by seeking funding for detailed investigations during AMP8 and by including two scenarios within our Final WRMP24. The first scenario assesses the impact of a lower environmental destination scenario (broadly equivalent to the EA's "BAU+" scenario) and

		<p>should take account of government objectives for the environment including their timeline for delivery. The environmental destination BAU+ scenario will not be sufficient to achieve the objectives of the environment policy and legislative targets as set out in Annex 2</p>	<p>assumes a 5% reduction in DO from 2030 onwards. The second scenario assesses a higher environmental destination scenario (broadly equivalent to the EA's "Enhanced" scenario) assuming a further 5% reduction in DO from 2040 onwards. The percentages chosen are based on an approximation of reduction seen in other companies within similar riverine environments to us and are intended to provide an indication of future alternative investment pathways that may be required in AMP9 and beyond.</p>
229	Natural England	<p>Natural England considers the Enhanced scenario the minimum required to deliver the government biodiversity policies and targets. In addition there is still significant uncertainty over the amount of water required for freshwater dependent sites such as lakes, wetlands and headwaters & peat, which has have been factored into the Enhanced scenario planning. Natural England advice is to aim for the enhance scenario as a minimum in Dwr Cymru Welsh Water long term planning horizons and these timelines should be adjusted to meet the timetable for environmental obligations set out in Annex 2.</p>	<p>Within our Final WRMP24 we are proposing to address any risks over the future long term sustainability of our raw water sources in two ways: by seeking funding for detailed investigations during AMP8 and by including two scenarios within our Final WRMP24. The first scenario assesses the impact of a lower environmental destination scenario (broadly equivalent to the EA's "BAU+" scenario) and assumes a 5% reduction in DO from 2030 onwards. The second scenario assesses a higher environmental destination scenario (broadly equivalent to the EA's "Enhanced" scenario) assuming a further 5% reduction in DO from 2040 onwards. The percentages chosen are based on an approximation of reduction seen in other companies within similar riverine environments to us and are intended to provide an indication of future alternative investment pathways that may be required in AMP9 and beyond.</p>
50	Natural England	<ul style="list-style-type: none"> • Dwr Cymru Welsh Water are aiming to reduce water PPC to 110 l/p/d and reduce leakage by 50% from 2017/18 levels by 2050 in line with WISER targets for water companies • Dwr Cymru Welsh Water are aiming to reduce leakage 	<p>We have added reference to the interim targets to Chapter 4 Section 4.1, and we have added text relating to our plans to reduce non-household demand to Chapter 4 Section 4.5.7.</p>

		<p>by 15% by 2024/25 against 2019/20 leakage levels. Dwr Cymru Welsh Water should expand on this to include the target of 20% reduction in leakage against 2019/20 leakage levels by 2027 and 30% reduction by 2032 as set out in the Environmental Improvement Plan</p> <ul style="list-style-type: none"> • Dwr Cymru Welsh Water are aiming to increase drought resilience to 1:500 years by 2040 in line with the WISER target • Dwr Cymru Welsh Water are aiming to achieve 95% meter penetration by 2035 • Dwr Cymru Welsh Water should include how they intend to meet the target to reduce non-household water demand by 20% by 2038 as set out in the Environmental Improvement plan 	
188	Natural Resources Wales	<p>Dŵr Cymru has provided a Natural Capital report to support its work on meeting its duties under s.6 Environment (Wales) Act 2016. The company has adopted the biodiversity net gain (BNG) framework for this report, aligning with that of WRW regional plan. During pre-consultation we noted that to meet Welsh requirements for ecosystem resilience the aspects of ecosystem resilience from the Act should be followed, including the diversity between and within ecosystems, the connections between and within them, their scale, their condition (including their structure and functioning) and their adaptability. If used in isolation we do not consider it appropriate to use the BNG approach for Welsh sites. The report also contains a lack of expected environmental enhancements and therefore this element should be strengthened. We recommend these aspects</p>	<p>The Welsh legislative requirements in The Well-being of Future Generations (Wales) Act 2015 and The Environment (Wales) Act 2016 are detailed in Section 1.8 of the Environmental Report. Section 6.5 of the Environmental Report outlines the contribution of the Draft WRMP to Wales’s Well-being Goals and the Objective for the Sustainable Management of Natural Resources. The elements of ecosystem resilience as set out in the Environment (Wales) Act 2016, have been considered in the baseline/key issues section for biodiversity within the Environmental Report.</p> <p>The NCA approach supports analysis in both England and Wales (as it was derived from a WRW/WRMP24 approach); however, the presentation of the findings will be revised to ensure appropriate alignment with the Welsh Government</p>

		must be further considered within the company's decision-making.	'Guiding Principles for Developing Water Resource Management Plans' and specific NC requirements.
189	Natural Resources Wales	We welcome the clearly presented nature of the Environmental Report (ER), including, Strategic Environmental Assessment (SEA) process, methods for option selection, the consideration of likely significant effects and how they've responded to our previous comments. In addition, the outcomes-led approach is clear, the plan's assessment of inter cumulative effects is comprehensive, and an options appraisal has been completed to aid decision-making.	Comment noted and support welcomed.
189a	Natural Resources Wales	There are however, areas which require further attention, including: the temporal scope includes the assessment of 'long-term' effects (over five years), although how far into the future is not defined. The main plan states that Dŵr Cymru are looking to ensure a secure supply of water for 25 years however the tables are populated until 2100 and the report states that the Water Resources West draft regional plan covers the period 2025 – 2085. Clarity is required regarding the definition of 'long-term' in the sense of identifying Likely Significant Effects (LSE) for the SEA and ensure that this adequately accounts for the life-cycle of the schemes / plan and the potential impacts to receptors.	Greater clarity has been included in the revised Environmental Report, regarding the definition of 'long-term effects' and the time period assessed for Likely Significant Effects, accounting for the life cycle of options.
190	Natural Resources Wales	Whilst the ER assumes implementation of 'standard best practice' mitigation measures, as there is no detail there is therefore no consideration of the extent of remaining residual significant environmental effects. Further detail should be provided and an assessment of any residual effects.	Section 6.6 of the Environmental Report details the potential mitigation and enhancement measures covering: <ul style="list-style-type: none"> • scheme design and planning; • biodiversity; • pollution prevention; • air quality;

			<ul style="list-style-type: none"> • human health; • social and economic well-being; • climate change and resource use; • cultural heritage; and • landscape. <p>Where relevant and appropriate, the revised Environmental Report, has include consideration of any residual effects, taking into account the mitigation measures identified and described in Section 6.6.</p> <p>However, it should be noted that mitigation will be considered in more detail during the planning phases of each of the individual schemes. Best practice procedures will be followed for all construction works and opportunities will be sought to go above and beyond standards set down in guidance. These issues would also be considered further at the project stage as part of the EIA process (as required).</p>
191	Natural Resources Wales	No reasonable alternatives have been assessed as part of this ER (as required under Schedule 2, paragraph 8 of the SEA Regulations 2004 (as amended)), therefore limiting the ability of the SEA process to influence the development of the draft WRMP. Reasonable alternatives to the preferred plan (such as ‘best environmental’ and ‘least cost’) should be assessed to provide justification of the selection of the ‘preferred plan’	SEA Regulation 12(2) requires the identification, description and evaluation of “the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”. For the purposes of the SEA, the revised feasible options have been considered as reasonable alternatives to the preferred options (that comprise the preferred plan). In addition, reasonable alternatives that operate at the plan level have also been considered linked to different future pathways/scenarios,

			<p>and where appropriate have been assessed in the revised draft Environmental Report.</p>
<p>192</p>	<p>Natural Resources Wales</p>	<p>The inclusion of monitoring requirements is high-level in nature with no clear indication of implementation. To meet the requirements of the SEA Regulations (Schedule 2, paragraph 9) the ER should set out a description of the proposed monitoring measures, as opposed to deferring to a ‘post adoption statement’.</p>	<p>Schedule 2, paragraph 9 of the SEA Regulations states that the Environmental Report should contain “a description of the measures envisaged concerning monitoring in accordance with regulation 17”. Regulation 17 (paragraph 1) states that the responsible authority (in this case DCWW) “shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”; and, (paragraph 2) “that the responsible authority’s monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with paragraph (1)”.</p> <p>Table 7.1 (Section 7.4) in the Environmental Report outlines the potential indicators that could be used for monitoring the effects identified by the SEA and include those currently monitored by DCWW or which could be monitored in future. Paragraph 7.4.4 specifically states that the list is provisional and indicative only (and as such not final). Intentionally, monitoring is included in one of the three questions used to support the consultation on the Environmental Report, “3. Do you agree with the proposed arrangements for monitoring the significant effects of the implementation of the draft WRMP24? If not, what measures do you propose?”.</p> <p>Following receipt on consultation responses, the</p>

			<p>monitoring proposals will be considered further and a final monitoring framework that satisfies the requirements of the SEA Regulation 16 (4) will be presented in the Post Adoption Statement which requires “the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme”.</p>
193	Natural Resources Wales	<p>The monitoring arrangements also do not cover the entirety of the assessment objective. For example, there is no evidence that the Human Health guide question; 'Will it be located in an area considered to be significantly more health deprived than others in the region?' is a monitored aspect over the course of the period.</p>	<p>Table 7.1 (Section 7.4) in the Environmental Report outlines the potential indicators that could be used for monitoring the effects identified by the SEA and include those currently monitored by DCWW or which could be monitored in future. Paragraph 7.4.4 specifically states that the list is provisional and indicative only (and as such not final). Intentionally, monitoring is included in one of the three questions used to support the consultation on the Environmental Report, “3. Do you agree with the proposed arrangements for monitoring the significant effects of the implementation of the draft WRMP24? If not, what measures do you propose?”.</p> <p>Following receipt on consultation responses, the monitoring proposals will be considered further and a final monitoring framework that satisfies the requirements of the SEA Regulation 16 (4) will be presented in the Post Adoption Statement which requires “the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme”.</p>
195	Natural Resources Wales	<p>Exposure to environmental hazards is unequal, disproportionately impacting those with lower levels of socio-economic status, income, employment, and education, as well as demographic differences such as</p>	<p>The deprivation subsection of the Population and Human Health section of Appendix D Baseline Analysis includes an overview of deprivation across the Welsh Water supply area, including high level commentary for the areas where</p>

		ethnicity, age, and gender. This contributes to health inequities and most often put disadvantaged groups at significantly higher risk for environmental health effects. There appears to be no location specific baseline deprivation profiles to ascertain the potential likely significant impacts of the options in a particular location.	deprivation is particularly pronounced.
196	Natural Resources Wales	Clarification is required within the summary of key issues regarding the statement 'the detection and removal of chemicals in the drinking water supply' – does this include vector-borne diseases?	Further clarification has been provided in the revised Environmental report.
121	Natural Resources Wales	We welcome the iterative approach that Dŵr Cymru has adopted in producing the information to support the Habitats Regulations Assessment (HRA) process. We acknowledge that many of our previous comments on the approach have been incorporated into the assessment process to produce this HRA. The company's HRA should also include consideration of the relevant site conservation objectives, in addition to listing the qualifying features.	Comment noted.
122	Natural Resources Wales	We do not agree with the conclusions of no likely significant effects given the inconsistencies around water availability at low flows for the Llechryd option. Our comments are as follows:	We commenced discussions with NRW to better understand the licensing regime of Afon Teifi and the volumes of water that may be available. NRW confirmed that additional water would only be available at lower flows down to Q98, which is a reduction in that assumed in the draft Plan. However, we have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, hence the option MSC08 'Upsize Llechryd WTW' has no longer been included in the revised preferred supply options selected for inclusion in the Revised Draft WRMP24.

123	Natural Resources Wales	We do not agree with the conclusions of no likely significant effects given the inconsistencies around water availability at low flows and that the impacts of the abstraction on flows below Q95 have not been adequately assessed, for example a 21MI/d abstraction at Q99 is greater than 10%. The company's assessment should consider the Habitats Directive Ecological River Flow (HDERF) objectives including a fully licenced abstraction scenario within the catchment and therefore, Dŵr Cymru should carry out further assessment.	We have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, hence the option MSC08 'Upsize Llechryd WTW' has no longer been included in the preferred supply options selected for inclusion in the Revised Draft WRMP24.
124	Natural Resources Wales	With regards to the construction impacts noted in 6.2.10 we require further information regarding proposed timings as there are migratory fish transitioning the lower reaches for much of the year; therefore, making avoiding key migratory periods difficult.	We have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, hence the option MSC08 'Upsize Llechryd WTW' has no longer been included in the preferred supply options selected for inclusion in the Revised Draft WRMP24.
125	Natural Resources Wales	If the scheme does however include potential flow restrictions (i.e. no additional abstraction below Q85 flows, and a maximum abstraction of 21MI/d at flows above Q85) we agree that adverse effects on the diadromous fish features of Cardigan Bay Marine SAC can be ruled out.	We have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, hence the option MSC08 'Upsize Llechryd WTW' has no longer been included in the preferred supply options selected for inclusion in the Revised Draft WRMP24.
55	Natural Resources Wales	Whilst we agree with the conclusions as presented, the detail given is relatively high-level and therefore further detail / assessments may be required at the project-level	We acknowledge the information presented on our demand management options in the draft Plan was high-level and so the environmental assessments could not be fully completed. The Revised WRMP24 contains much greater level of detail on the selected options to deliver our preferred demand management programme and which will allow them to be fully assessed through the environmental assessment process.

93	Natural Resources Wales	It's unclear what the extent of the negative impact [of the Llechryd scheme] on fisheries is likely to be. The impact may be moderate negative but could be worse and additional work is required, particularly regarding the operation of the scheme and impacts at low flows (i.e. <Q95). We note that the conclusion includes some uncertainty and this is appropriate. Mitigation proposals are generic and not well developed which is probably to be expected at this early stage. More detail will be required as the proposals progress. Section G33, Objective 5 also incorrectly states 'WA for licencing across the whole flow regime'.	We have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, hence the option MSC08 'Upsize Llechryd WTW' has no longer been included in the preferred supply options selected for inclusion in the Revised Draft WRMP24.
94	Natural Resources Wales	Dŵr Cymru has also submitted an abstraction licence variation to NRW for Llechryd. If granted the company will then need to ensure that the environmental assessments in the final plan are updated to include any change in licence conditions.	The annual licence variation has now been granted and this new volume will be included in any future assessments, however, we have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, especially under peak week conditions, and so we have removed this scheme from our Revised Plan.
95	Natural Resources Wales	It is unclear if the proposed new abstraction regime will include abstractions below Q85. The current Abstraction Licencing Strategy (ALS) document states that there is only sufficient water available for new licencing up to Q85 and therefore, this proposed variation is likely to contain a 'Hands off Flow' (HoF) at the Q85 flow. It is likely that this will adversely impact DCWW's ability to abstract these additional quantities during periods of low flows (such as droughts).	We commenced discussions with NRW to better understand the licensing regime of Afon Teifi and the volumes of water that may be available. NRW confirmed that additional water would only be available at lower flows down to Q98, which is a reduction in that assumed in the draft Plan. However, we have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, hence the option MSC08 'Upsize Llechryd WTW' has no longer been included in the preferred supply options selected for inclusion in the Revised Draft WRMP24.
96	Natural Resources	Dŵr Cymru has submitted an abstraction licence variation	The annual licence variation has now been granted and this

	Wales	to us for this source to increase the annual average limit condition. This is still being determined and so it is right that it is not included within the draft plan (confirmed by correspondence). If this is granted the company will need to ensure that all the environmental assessments at project-level are updated to include any change in licence conditions and submitted to ourselves as part of any further licence variation.	new volume will be included in any future assessments, however, we have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, especially under peak week conditions, and so we have removed this scheme from our Revised Plan.
97	Natural Resources Wales	Table 6.3 has an error and has transposed the flow targets for high and very high sensitivity reaches, in addition to errors and inconsistencies throughout the report around water availability at low flows that need to be addressed.	We have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, hence the option MSC08 'Upsize Llechryd WTW' has no longer been included in the revised preferred supply options selected for inclusion in the Revised Draft WRMP24.
110	Natural Resources Wales	The calculated inflows for Llyn Brienne require the model to be over-ridden when the reservoir is full to match observed data. The company should state the impact this therefore has on the modelling and potential impacts on the Nantgaredig modelled flows. The inflows for Lliw reservoirs include uncertainties regarding the data used to simulate the transfer from Nantgaredig and the company should provide further information on this.	Thank you for your comment. As per our email dated 6th March 2023, Appendix 5 of the draft WRMP24 (Inflows Update) states: "The mass balance calculation pins the storage to full when it was full in the observed data, otherwise the modelled reservoir storage cannot sustain the spill and results in the reservoir emptying". This refers to the method of calibrating parameters for inflows and does not mean Aquator model is over-ridden at any point. Due to uncertainties with the transfers between Nantgaredig, the Lliw reservoirs and Felindre WTW, GR6J inflows for the Lliw reservoirs were calibrated against QUBE time-series, however because the inflows here are so small in comparison to the water incoming from Nantgaredig, we are confident this approach doesn't have any impact upon our calculated DO.
111	Natural Resources	We are unable to fully comment on the modelling reports	These reports were not available at the time of submission

	Wales	for the Clwyd Coastal and M&S Ceredigion zones (deficit zones) as these were unavailable at the time of public consultation. We will provide any additional technical queries regarding their water resources modelling of zones direct to the company before publication of their final plan. We have sent the company additional technical queries regarding their water resources modelling of zones for which reports are available which will require addressing.	of our draft Plan but have since been provided to NRW and we are happy to work with you to address any queries you may have, following your review of these additional reports.
150	Natural Resources Wales	The resource zone integrity report states that the Pembrokeshire zone has poor connectivity between the Pendine, Preseli and Bolton Hill Water Treatment Works, with investigations proposed to overcome this. This information has not been presented in any detail and the company should present solutions to overcome this lack of connectivity and / or increase the resilience of the Pendine system.	Our WRZ Integrity assessment (Appendix 20) states "The Pendine system only has minor connectivity with the Preseli and Bolton Hill systems and so this is an area that requires careful management." and so we would disagree with the description of "poor connectivity". Investigations have been scoped to better understand the cause of the water quality issues with the source (notably turbidity) as well as potential network options to enhance the connectivity with the Bolton Hill/Preseli system but from a WTWs resilience perspective. This is being assessed as part of the PR24 resilience case to understand the level of risk.
151	Natural Resources Wales	Whilst other plans are mentioned it is unclear how, or if, Dŵr Cymru has maximised any potential benefits from working with these other planning processes. In particular we would expect to see stronger links included within the final plan to the Drainage and Wastewater Management Plans, NRW's Area statements, the company's wellbeing plan (beyond metrics in options appraisal) and biodiversity / ecosystem enhancement plan.	We have added commentary in Chapter 1, Section 1.2.2 to better explain any linkages between our WRMP, our Business Plan, our Drainage and Wastewater Management Plan, our Drinking Water Safety Plans, and our Biodiversity Plan.
75	Natural Resources	Dry Year Critical Period (DYCP) scenarios have been	We have added commentary in Chapter 2 Section 2.2.2 to

	Wales	presented for two resource zones within Wales – Pembrokeshire and Mid & South Ceredigion. Dŵr Cymru should consider providing critical period forecasts for other resource zones such as North Eryri / Ynys Mon, Tywyn Aberdyfi, Bala and Lleyn Harlech Barmouth where there are known peak demands (such as through tourism).	explain that our experience in 2022 significantly tested our peak week capability and that as such we are confident that we do not need to investigate any additional zones for critical period planning concerns above those identified in our draft WRMP24.
91	Natural Resources Wales	Dŵr Cymru has presented its company-wide levels of service within its draft plan of 1:20 for Temporary Use Bans (TUBs) and 1:40 for Non-essential Use Bans (NEUBs). The reader is however, expected to refer to the company’s drought plan for resource zone levels of service. The company should include these within their final plan and state where these are planned to change through time, if relevant.	We have added this information into Appendix 19, the WRZ summaries, based on our updated supply capability assessment which has improved our understanding of zonal levels of drought resilience since production of Drought Plan in 2020.
76	Natural Resources Wales	Dŵr Cymru has held pre-consultation discussions with statutory consultees during the preparation of the draft plan. The company however, have only included a brief summary of the consultee feedback and should consider incorporating details of topics and feedback by each organisation within its final plan, including how stakeholders have influenced plan development.	We have added a more detailed table of pre-consultation feedback with cross referencing to where feedback has been addressed in our revised draft Plan. This table is in Chapter 2 Section 2.6.1
152	Natural Resources Wales	The deployable output for the Tywyn Aberdyfi zone has increased notably since WRMP19 and the company should utilise any data from summer 2022 to confirm the new inflows.	To confirm our revised DO for the Tywyn Aberdyfi zone, we commissioned HR Wallingford and BGS in 2022 to review and recalibrate our recently built hydrological model to take account of more recent flow data and investigate the resilience of flows in the Afon Fathew to drought. This review has utilised the low flow data seen in 2022 and concluded that our updated drought resilience assessment for the Afon Fathew source and therefore the Tywyn

			Aberdyfi zone, is robust. This report is included as Appendix 23 to this Plan.
187	Natural Resources Wales	The calculation of deployable output includes the requirement to account for all constraints on a source. We expect the company to work closely with ourselves ahead of publication of the final plan to ensure that these constraints are fully understood for all sources across the zone, particularly regarding the licence queries / statutory provisions for Pontsticill and Llwynon reservoirs.	We have added text to Chapter 3 Section 3.2 explaining that queries around the compensation flow clauses for the Taff Fechan reservoirs have been resolved.
153	Natural Resources Wales	Dŵr Cymru states within its main technical document and appendices that the level of resilience for the planning period is 1:200 (0.5% chance of failure in any year) throughout, although this results in final plan deficits for Clwyd Coastal, M&S Ceredigion, Tywi Gower and South East Wales Conjunctive Use System (SEWCUS). The company's main technical document and appendices should be amended to reflect the data as presented within the WRMP tables with the level of resilience shifting throughout the planning period for these zones, i.e. for M&S Ceredigion, Tywi Gower, Clwyd Coastal and SEWCUS the resilience being planned for under the preferred plan is 'worst historic drought' through AMP8 (2025-2030) and 1:200 (0.5%) thereafter.	The text in our Plan is now clearer around our preferred level of service for emergency drought orders and we have added a new table into Chapter 2 Section 2.3.1 explaining our minimum levels of service and our target dates for achieving 1:200 then 1:500 drought resilience in all zones.
186	Natural Resources Wales	The plan should also be clearer regarding planning to the 1:500 (0.2% chance in any year) planning scenario. If the objective (and therefore the preferred plan) is to meet this level of resilience by 2040 (as stated within the text) then the data tables should reflect this. Otherwise the final plan needs clear that the 1:500 resilience is	The text in our Plan is now clearer around our preferred level of service for emergency drought orders and we have added a new table into Chapter 2 Section 2.3.1 explaining our minimum levels of service and our target dates for achieving 1:200 then 1:500 drought resilience in all zones.

		presented as sensitivity testing scenario.	
35	Natural Resources Wales	For climate change the company should ensure that the reported impacts are consistent between the tables and appendices in addition to providing further explanation regarding the translation of the spread probabilistic model results to headroom allowance.	We have added additional text into our headroom technical appendix to address this comment.
6	Natural Resources Wales	There is a discrepancy between the description of the Poulton abstraction rate within the appendices. The summer rate of 28 MI/d should be reduced for climate change modelling in line with the results of NRW's report for Dee Consultative Committee members.	Within our DO modelling we assume that Stage 2 cutbacks (28 MI/d) are implemented every year from May to October for all years simulated, which we feel is a very conservative position based on the current Dee General Directions. The modelling was completed before NRW'S report for the Dee Consultative Committee members and so we will re-run our climate change DO modelling for the Alwen-Dee although we feel that reducing our current assumptions around the modelling of Stage 2 cutbacks by 26% is too precautionary and so we will recommend testing the reduced allocation over a shorter period.
7	Natural Resources Wales	With the model for the Pembrokeshire zone Dwr Cymru has included the Llys y Fran freshet within the the flows available to abstract at Canaston Bridge (i.e. contributing to river flows and the hands off flow allowance). The company should model these the same as the Llyn Brianne freshet, so the releases do not contribute to river flows for abstraction. The model for this zone also includes inflows for the Western Cleddau at Treffgarne, with the flow duration curve presented for the period 2014 - 2015 and the text indicating data until 2018 - given the short record we would recommend also including more recent data.	Within our DO model for Pembrokeshire all abstraction licence calculations at Canaston Bridge are made without the inclusion of any freshet release i.e. we do not abstract these within our model. We will update the DO report to better reflect this.
8	Natural Resources	We welcome that Dŵr Cymru, through working with	We have added text to Chapter 3 Section 3.5.1 providing

	Wales	ourselves, plans to deliver projects through the NEP to investigate the environmental sustainability of their sources under climate change scenarios as well as the potential for delivering nature-based solutions for water resources benefit. The draft plan however, does not include details of these initiatives. We recommend that the company provides further details of these NEP commitments within its final plan.	more information on our AMP8 programme of investigations, including the objectives of our planned studies.
11	Natural Resources Wales	Dŵr Cymru has a large number of unused sources classed as either mothballed or unused sources (reported within their WRMP tables). Further clarity is required regarding their use as no further deployable output benefit has been stated for mothballed sources within the draft plan. The company's 2020 Drought Plan states that mothballed sources would be brought back online to increase supply and they have committed to providing updated environmental reports for these. The company should state within the final plan the intention for these sources.	We have added text to Chapter 3 Section 3.5.2 providing clarity on the potential use of mothballed sources in drought, or as options for longer term development.
231	Natural Resources Wales	Dŵr Cymru has bulk supply agreements with two New Appointment and Variation (NAV) companies, Albion Eco (Alwen Dee WRZ) and Leep Networks (Water) Ltd (Tywi Gower WRZ). The information provided within the draft plan regarding the bulk supply to these NAVs is different to that given in the receiving company's draft plan. As the donor, the company should ensure that bulk supply volumes (including any restrictions on supply) and the demand forecasts presented within their plan are consistent with those presented by Albion Eco and Leep. The company's final plan should also include information on the newly appointed NAV Icosa Water Services site	Additional text has been added to Section 3.7.3 to confirm the bulk supply agreements we have in place with the New Appointment and Variation (NAV) companies. If there are still areas of discrepancy between ours and the NAV companies' WRMPs then we will address this directly with them.

		(Alwen Dee WRZ) once Icosa incorporate it within their plan.	
138	Natural Resources Wales	Dŵr Cymru has highlighted its intention to reduce outage for three Water Treatment Works (WTW) within SEWCUS, through either asset replacement or upgrades. There are however, a number of WTW within Wales for which high outage has been reported including Trecastell (Clwyd Coastal), Mynydd Llandegai (NEYM), Carno (SEWCUS), Nant y Bwch (SEWCUS) and Penybont (Tywyn Aberdyfi). The company should set out how they intend to reduce these high outage levels within their final plan or provide justification for the high outage figures	We have added text to Chapter 3, Section 3.8.3 explaining the high levels of outage at these works and the factors affecting this.
78	Natural Resources Wales	Within the headroom report it is stated that 'new scheme uncertainty', which was included in WRMP19, has been excluded. The given reason is the move to scenario-based planning. The company should explain within the plan how 'new scheme uncertainty' is included within their scenario-based planning.	We have added additional text into our headroom technical report (Appendix 9) to address this comment.
58	Natural Resources Wales	Dŵr Cymru has not incorporated the UKCP18 climate change models into their demand forecasting, rather they've utilised the UKWIR 2013 methods which are based on UKCP09. The appendices states that the relevant reports are not yet available. The company should ensure that these updated figures are included within its final plan, unless they can demonstrate that the differences to demand forecasts are insignificant.	Please see Chapter 4, Section 4.3.3 Incorporating Climate Change, where we have addressed the use of UKCP18 climate change models into our forecasting of demand.
59	Natural Resources Wales	The company should ensure that the demand figures stated within the main plan text and the WRMP tables are consistent. For example, Figure 51 provides a total leakage of 85.52MI/d by 2049/50, whereas the tables	Thank you for your comment, we have now resolved this inconsistency.

		provide a figure of 89.71MI/d for this year.	
62	Natural Resources Wales	The base year within the draft plan for household demand projections is set at 2019-20. Dŵr Cymru currently have a high company annual average PCC, and whilst we acknowledge the increase in household water usage during the Coronavirus pandemic, this was increasing before the base year of 2019-20. The company are assuming that their WRMP19 targets will still be met, resulting in a large drop in PCC within AMP7 (2020-2025). We believe this assumption is un-realistic given there is no plan in place to bring PCC to these levels. Dŵr Cymru should present how they plan to meet this target before the start of AMP8 in addition to including this within their demand management scenario testing.	We have revised Chapter 4 to describe the impact of the water balance re-statement. The demand forecast has fully reflected the outcomes of this and have re-confirmed our commitment to achieve the long-term demand reduction targets that were set in our Draft WRMP24. We accept that the achievement of our AMP7 targets is challenging, and we have recovery plans in place that aim to meet our targets. Our annual APR data does show that demand trends are reverting towards the pre-covid position. As you suggest, we have undertaken sensitivity around achieving our demand management targets on our future Plan. This shows that this would have no impact on achieving our AMP8 and long-term targets under the Preferred Plan. However, aim recover the position as soon as possible.
129	Natural Resources Wales	Reducing non-household demand is a key component of reducing distribution input, alongside household demand and leakage. Within Appendix 10 (Water Demand Forecasting Methods) the company states that they do not have a plan for reducing non household demand. Given the reliance of the plan on demand reduction the company should present a strategy for reducing non-household usage.	Please see Chapter 4, Section 4.5.7, where we have added information on our plans from AMP8 to increase our support and commitment to Non-household customers in improving water efficiency to reduce both usage and any wastage of water.
90	Natural Resources Wales	We welcome the projects proposed by the company to reduce leakage. We would however, expect further embedding of the latest advances in technology and research (including behavioural approaches to reducing demand) within the final plan.	We acknowledge that the draft Plan contained very limited detail on our leakage strategy and so in the revised Plan we have addressed this comprehensively through additional text in the main report (please see section 4.6.1) and by the inclusion of new technical reports setting our leakage option appraisal and optimisation process (Appendix 24).
31	Natural Resources	A best-value plan has only been demonstrated for deficit	We have updated Chapter 6 to describe how we have

	Wales	zones with zones in surplus having company-wide demand policies applied. Dŵr Cymru should demonstrate how they have taken a best value planning approach to all its zones within the final plan.	ensured that our leakage, metering and water efficiency programmes are 'Best Value' across the whole company area, not just in the identified deficit zones.
101	Natural Resources Wales	The preferred metering option is provided with some justification, it is however unclear if this represents the 'best value' plan for demand management. Appendix 10 (Cost Benefit Analysis model) provides an appraisal of the preferred option; minimal detail however, is given on other options considered. The company should present further analysis of all metering and demand options, including demonstrating why installation of AMI meters hasn't been considered earlier within the planning period and use of different tariffs.	Chapters 4 and 5 now provide additional information regarding our demand management strategy and options including AMR and AMI metering. Chapter 6 describes how we have ensured that our leakage, metering and water efficiency programmes are 'Best Value' across the whole company area, not just in the identified deficit zones.
102	Natural Resources Wales	The draft plan also sets out that not all properties which will be metered will be switched to metered rates. The company have not specified the estimated impact that this would have or evidence of the efficacy (with regards to reducing water usage) of metering whilst remaining on un-metered billing. The company should provide further information and justification within the final plan.	Chapter 4 has been updated to provide more detail around our metering strategy and why we believe the 'progressive' option we are adopting is the best approach, particularly in relation to concerns over affordability.
141	Natural Resources Wales	Dŵr Cymru have included a PCC reduction of 6 litres per head per day (l/h/d) by 2050 from Government-led interventions (water labelling), these are at the lower end of the forecast water savings. Dŵr Cymru should include within their 'higher demand' scenario testing the impact of these savings not being achieved in addition to liaising with the Welsh Government regarding the implementation and efficacy of these schemes.	Since the draft Plan we have reviewed and updated our assumptions around the likely savings we may see from the introduction of water labelling and have now adopted a less conservative scenario within our preferred planning assumptions. Section 4.5.8 provides more information on this.
142	Natural Resources	We expect the company to set challenging targets to	Our PCC target has been updated since the draft Plan and

	Wales	actively reduce its PCC over the planning period and welcome its commitment to meet a company 110 l/h/d target by 2050. The 110 l/h/d target set by the company for PCC however, is for the 'normal year' as opposed to the 'dry year' scenario (which is 116.3 l/h/d). The company should clarify within their final plan that the target is 116.3 l/h/d and why this target is an increase of c.16 l/h/d on their WRMP19 target of 100 l/h/d by 2050.	we confirms we are seeking to achieve 110 l/p/d by 2050 under a 'dry' year, rather than a 'normal' year. We have chosen this target in order to align to the wider water industry position. At WRMP19 there was not yet a confirmed industry-wide target but since then further work and guidance has been produced to identify what a suitable, and challenging, long term target for PCC reduction should be.
132	Natural Resources Wales	A report has been provided regarding private water supplies in Wales with a broad assessment of the potential for some private water supply users to switch to the public water supply. Whilst we accept that there are many assumptions and large uncertainties with this work, it is unclear the extent that this report has been incorporated into Dŵr Cymru's forecasts and policies. The company should clarify to what extent this report has been included within their forecasts and any further work that is required to understand this policy area within its final plan	We commissioned ARUP to undertake a review of the current state of knowledge in relation to private water supplies across our operating area to understand what data was available that could be incorporated within our planning. Although the report (Appendix 12 to the main Plan) has provided an initial high level estimate of the potential scale of non-pWS demand, it acknowledges that the significant uncertainties with this data, notably the volumes, location and usage of the water, means that it cannot be currently incorporated into our WRMP in any meaningful way.
32	Natural Resources Wales	Carbon emissions are considered within options development and the overall company response to the Climate Change (Wales) Regulations 2021 targets are set out. There is however, no specific detail on the existing water resource operations contribution to the company's emissions or targets. This information should be presented within the final plan or readers directed to where the information can be found	Appendix D presents the baseline analysis for all the topics scoped into the SEA, including climatic factors. This presents information on DCC's carbon emissions (repeated below): "Welsh Water has reduced its carbon emissions by 65 per cent since 2010-11. This reflects Welsh Water's investment in energy efficiency and renewable generation and reduced grid imports. In 2021-22, Welsh Water's total net operational carbon emissions stood at 110.7 ktCO ₂ e, a slight increase from 106.0 ktCO ₂ e in 2020/21. Increases

			were seen in scope 1 and 3 emissions but a significant decrease in Scope 3 emissions from 103.6 ktCO ₂ e in 2020-21 to 91.3 ktCO ₂ e in 2021-22.”
33	Natural Resources Wales	Dŵr Cymru has included carbon costings within their draft plan. They do however, state that they do not utilise the September 2021 guidance from the Department for Business, Energy & Industrial Strategy (BEIS). The company should update their final plan carbon costings to include the latest guidance as per the planning guideline.	New guidance from the Department for Business, Energy and Industrial Strategy (BEIS) on carbon costing was release in September 2021 which demonstrated large increases in the underlying carbon values. Our internal Unit Cost Database has not yet been updated to incorporate these as additional guidance and justification around their inclusion is still required.
133	Natural Resources Wales	There is further scope for the company to also include additional nature-based solutions within its current options appraisal to improve water quality issues and increase source resilience (taking an ecosystem based approach) given these have not been demonstrated beyond limited options within the unconstrained options list	We note your comment but at this stage do not feel we have sufficient detail available to us on the costs and benefits of nature based solutions across our operating area to enable these to be included within our options appraisal. We acknowledge the potential role these types of schemes could have, which is why we are seeking funding in our PR24 submission to allow us to undertake detailed trialling to help provide more evidence for their potential inclusion in our WRMP29.
66	Natural Resources Wales	Reducing the demand for water is vital to Dŵr Cymru ensuring a secure supply of water, of which reducing household demand is a key component. Within Appendix 10 (Water Demand Forecasting Methods) the company states "we do not have a comprehensive plan to deliver the longer-term company-led demand reductions required to reach the 2050 target". This is a significant issue and the company should set out a comprehensive water efficiency plan to decrease household demand and reduce the uncertainties associated with this. This is particularly relevant given that the company has had the	We acknowledge that within our draft WRMP24 the benefits of both our metering strategy and the introduction by Government of its water labelling programme, would only reduce our forecast PCC to 122 l/h/d by 2039-40 and that we had not formally defined and costed the company-led water efficiency interventions that would be required in the period between 2040-41 to 2049-50 to achieve the further reduction to 110 l/h/d. Our supply demand balances included the benefits of achieving the 110 l/h/d and so the draft Plan correctly presented our drought resilience but within the revised Plan we have now detailed

		highest company annual average PCC in England and Wales for the past three years.	the water efficiency activity needed to achieve the 110 l/h/d target.
2	Natural Resources Wales	Dŵr Cymru should utilise learning from 2022 drought experience and previous prolonged dry weather events such as 2020 regarding source reliability at low flows especially within SEWCUS. Within the modelling we would welcome further discussions with the company regarding the reliability of Prioress Mill (a key source within the zone) at low flows and if further investment or licence changes are required at this or nearby sources (such as at Llantrisant), then this should be included within the final plan.	We have reviewed our experience of operating Prioress Mill during the challenging conditions of Summer 2022 and are confident that we understand the issues behind this. We are Planning to fund a new fish Screen at Llantrisant so that we have some resilience if we encounter even lower flow conditions at Prioress Mill in the future. Section 6.5.2 (SEWCUS) has been updated to reflect this.
41	Natural Resources Wales	Dŵr Cymru has not included a potential future demand within its SEWCUS zone from the Canal and River Trust (CRT) for the Monmouthshire and Brecon Canal. The company has stated within its draft plan that any bulk supply requirement with CRT will be treated as a non-potable supply from stand-alone sources. We consider that this bulk transfer should not be considered as a stand-alone source of supply given the use of Usk reservoir, rather it is highly integrated within their complex (and deficit) SEWCUS system and should be treated as such within the plan	We have modelled the impact of providing support water to CRT in our supply demand balance assessment for the SEWCUS WRZ and included the outputs of this within Section 6.10. Due to the licence conditions being subject to challenge from the Trust and ongoing commercial discussions, we are not yet at a point where this can be formally included within our SEWCUS supply demand assessment and for now is still presented as a 'scenario' within our Plan.
197	Natural Resources Wales	The Llwynon gravity main upgrade option has the potential for deterioration of water quality of the Nant Cae-dudwg, and consequently the Taff, particularly as the discharges will occur during dry weather when flows may be low. The discharges may have a negative impact on fish species if they cause a deterioration of the water quality. Controls for this will need to be in place as fish	In light of the comment received from NRW on this option we have updated the scheme components to increase the length of discharge pipeline from the trunk mains to enable the water to be discharged directly into the larger River Taff rather than the much smaller tributary of the Nant Cae-dudwg. The option costs have been updated accordingly to reflect this increase in scope but it still forms

		species are more at risk from poor quality during the summer months when river flow volume is lower and temperatures are higher. The company should provide further details of mitigation for this option in the final plan.	a key part of our 'Best Value' programme to deliver the required levels of drought resilience in our SEWCUS zone. Many thanks for your input to this scheme.
36	Natural Resources Wales	A final plan deficit of 0.09 MI/d is presented for Clwyd Coastal at the start of the planning period (2025-26), even under the worst historic drought scenario. Dŵr Cymru must include within their final plan further actions they intend to take within this zone to ensure a secure supply of water for this year.	We have reviewed our supply demand balance assessment for the zone in light of our planned AMP7 'leakage recovery plan' and confirm that we are not forecasting any deficits in the Clwyd coastal WRZ.
92	Natural Resources Wales	To address the baseline planning deficit forecast within the Mid & South Ceredigion zone, Dŵr Cymru have proposed option MSC08 – Llechryd water treatment works upgrade and increased abstraction. The Teifi and North Ceredigion Abstraction Licencing Strategy (2014) indicates that water is available for licencing with a Q85 Hands off Flow5 (HoF) condition. It is unclear from the draft plan if Dŵr Cymru have accounted for this condition within its deployable output, as it would mean no additional abstraction during low flows if a variation is applied for and granted. We recommend the company clarifies what the proposed abstraction regime for this scheme would be (i.e. does the proposal include the increased abstraction at low flows). Due to this lack of clarity, the company cannot rule out likely significant effects on the Afon Teifi Special Areas of Conservation (SAC) or impacts to WFD Regulations waterbody status at this stage if the proposal includes abstraction across the whole flow regime. We recommend Dŵr Cymru further	Upon receiving this particular consultation response we commenced discussions with NRW to better understand the licencing regime of Afon Teifi and the volumes of water that may be available. NRW confirmed that additional water would only be available at lower flows down to Q98, which is a reduction in that assumed in the draft Plan. However, we have reassessed our supply demand balance and concluded the zone does meet its required drought resilience, especially under peak week conditions, and so we have removed this scheme from our Revised Plan.

		assesses the feasibility of this option and carries out further environmental assessment work if required	
12	Natural Resources Wales	Utilising an adaptive planning framework is mentioned several times within the draft plan. It is clear however, that this approach has not actually been followed as a 'conventional' plan has been presented. We believe that there are several areas of uncertainty within the draft plan which justifies the use of an adaptive plan. Of particular concern are the uncertainties within the Clwyd Coastal zone. The surpluses within this zone are dependent on no change to its supply sources and effective demand management measures (enhanced measures have been proposed). The draft plan (section 6.2.3) states that there are known uncertainties regarding the outcome of sustainability studies of the company's Llanerch borehole, a key source for this zone. Given the risk to supply the company has included within their preferred plan a proposal for an option to investigate a transfer from the neighbouring Alwen Dee zone, with no further detail provided.	<p>Our revised Plan includes significantly more information on the 'adaptive planning' approach including the alternative futures that have been assessed, the decision points that have been identified, and the composition and dates of schemes to resolve additional deficits. Sections 6.6 and 6.7 contain fuller details.</p> <p>For Clwyd Coastal, the 'Sustainable Abstraction' and 'Compound High' adaptive pathways both reveal the risk of a deficit, emerging in 2030 and 2040 respectively. Given the AICs of alternative options, the solution for the deficit is relatively straightforward and 'low regret' in both cases, hence we will undertake detailed design work on the Alwen to Clwyd Coastal link main during AMP8. A decision to construct this scheme would then be taken as part of WRMP29.</p>
13	Natural Resources Wales	The plan also states that large new commercial or industrial forecasts are not within the preferred plan and are included within adaptive pathways – this does not appear to have actually been included within the draft plan. The company should present how this nonhousehold demand has been accounted for, including how the National Development Framework has been incorporated.	We are aware of a number of other industrial customers that may need further non-potable water supply in the future. We are working with both the Pembrokeshire Net Carbon Zero project, Albion Water and others to understand their future needs for water and where we are able to provide support for these. However, we have not moved to a level of certainty with any of these that warrant their inclusion within our Plan beyond this statement. These are therefore not included within any adaptive pathways.

19	Natural Resources Wales	We recommend that the company presents adaptive pathways for relevant zones (including Clwyd Coastal) with a clear narrative, any causal links explained (e.g. if an abstraction is reduced by 10% it will result in a move to a specific pathway), decision points for options, metrics (upon which decisions between pathways are made, such as population) and monitoring of these metrics	Adaptive pathways are presented for relevant zones in Chapter 6, Section 6.7 of our revised draft Plan.
200	Natural Resources Wales	SEW168 – Llwynon gravity main No specific issues identified at this stage, however the company will need to consider the Llwynon comments in section Improvements – Options.	In light of the comment received from NRW on this option we have updated the scheme components and option costs. The scheme remains a key part of our 'Best Value' programme to deliver the required levels of drought resilience in our SEWCUS zone.
17	Ofwat	A Board Assurance Statement and supporting statement have been provided, detailing how the Board were engaged and stating their satisfaction with the plan. The Board Assurance Statement is not signed and should be for the final plan.	Noted, the Board Assurance Statement is signed for the revised draft Plan and will be signed for the Final Plan.
113	Ofwat	We welcome that third-party technical assurance of the best value optimisation process has been carried out.	Noted, thank you for your comment.
114	Ofwat	We welcome that stakeholder and customer engagement has been undertaken and presented in the draft WRMP. Customer engagement produced insights to customer preferences which have been used in best value decision making to form the plan. Customer views on leakage, drought, supply options and demand management were sought as part of customer engagement activities. Extensive customer engagement has been undertaken to inform customers of the options available for Dŵr Cymru's company area. Best value planning has considered customer preferences in option selection and	Noted, thank you for your comment.

		phasing. Bill impact was included in engagement, although not quantified in the form of estimates.	
115	Ofwat	Engagement with the WRW regional group included a discussion session focused on issues concerning Wales and how they might be addressed through the WRMP. Regular engagement with WRW members and neighbouring water companies has been undertaken to align strategies as part of the draft WRMP planning and pre-consultation process. Adequate engagement with regulators has been undertaken and has been used to refine the draft WRMP.	Noted, thank you for your comment.
216	Ofwat	Dŵr Cymru has used a 25 year planning horizon, which meets the minimum requirements set out in the water resources planning guideline. The company should explain more clearly in its final WRMP the rationale for the chosen planning horizon, including linking back to challenges identified in its problem characterisation as to why there has been no benefit to planning further ahead.	We have chosen not to appraise our Plan across a longer planning period as the increased uncertainty around planning to a much later timeframe does not provide benefits in terms of the short to medium term decisions made around our investment programme. This is demonstrated through the testing of our Plan which does not suggest the need for long lead time assets.
47	Ofwat	We expect the company to deliver its PR19 and WRMP19 targets. Dŵr Cymru should not expect additional customer funding to address deficits resulting from under delivery in the current or previous periods. We expect the company to review its proposals in these areas for its final WRMP.	We have revised the text in Chapter 1 Section 1.3.5 to update on the delivery of our WRMP19 and PR19 commitments. We anticipate that this will also be addressed through the Price Review process.
222	Ofwat	Dŵr Cymru should ensure that it is on track with WRMP19 supply and demand-side options delivery, making substantial efforts where necessary to meet PR19 commitments ahead of WRMP24.	As above, we have revised the text in Chapter 1 Section 1.3.5 to update on the delivery of our WRMP19 and PR19 commitments. We are currently delivering our Canaston and Vowchurch schemes.
219	Ofwat	Improved resilience is stated to be a key driver of investment for this plan, with the intention to meet a 1 in	The text in our Plan is now clearer around our preferred level of service for emergency drought orders and we have

		<p>500 year resilience target by 2040 at the latest, which exceeds minimum resilience targets for Dŵr Cymru and aligns with targets for companies in England. However, the 1 in 500 year resilience is not incorporated into the preferred plan, and is instead considered in scenario testing. We therefore view Dŵr Cymru 's resilience target as ambiguous, and it is not clear if or when the plan would move to meet this resilience target, dependant on how different sensitivity scenarios played out. Dŵr Cymru should clearly set out its ambition on drought resilience levels of service in its final plan. This should include when the plan will move to a higher resilience target. Elsewhere, Dŵr Cymru has stated its levels of service for temporary use bans (TUBs) and non-essential use bans (NEUBs)</p>	<p>added a new table into Chapter 2 Section 2.3.1 explaining our minimum levels of service and our target dates for achieving 1:200 then 1:500 drought resilience in all zones. Our supply demand information includes the incorporation of the 1:500 LoS within the Preferred Plan.</p>
214	Ofwat	<p>We provided detailed feedback on Dŵr Cymru's assessment of water needs in our preconsultation feedback in 2022. Some of our feedback has not been appropriately or fully addressed in the draft WRMP, and has been raised again in amongst points in this section. Dŵr Cymru should provide sufficient and convincing evidence that the feedback has been addressed in the final WRMP.</p>	<p>We note your comment and have added additional text in the relevant Plan sections to ensure your pre-consultation feedback has been addressed.</p>
18	Ofwat	<p>There is a brief description of the lines of assurance for identifying risks, however no information on the governance and decision making structure used to form the plan and should be included in the final plan</p>	<p>We have added further information around our WRMP Assurance and approval process in Chapter 2, Section 2.7</p>
9	Ofwat	<p>The company clearly describes the biggest uncertainties around achieving its long-term objectives, but it is not clear how one of these, namely potential abstraction</p>	<p>We have added text to Chapter 3, Section 3.5.1 explaining the ways we are addressing this uncertainty around future sustainability of our abstractions. We have also included</p>

		reductions from AMP9, has been taken into account in the plan.	additional scenarios and adaptive plans around sustainability reduction in section 6.
220	Ofwat	The draft WRMP states Natural Resources Wales (NRW), through a more holistic catchment based outcomes approach, have not proposed specific abstraction reductions for this WRMP. However, the draft WRMP also states that significant longer term uncertainty exists for sustainability reductions needed to meet the Environment (Wales) Act 2016. Whilst the plan explains AMP8 work is scheduled to provide greater certainty, it is not clearly set out how the plan would change to accommodate this, other than generally risking not achieving higher resilience levels or altering demand strategies. This should be better set out in the company's final WRMP.	As above, we have added text to Chapter 3, Section 3.5.1 explaining the ways we are addressing this uncertainty around future sustainability of our abstractions and we have also included additional scenarios and adaptive plans around sustainability reduction in section 6.
218	Ofwat	The company's headroom allowance is high compared to most other companies, at a scale of over 11% of the company distribution input during 2025-30. Therefore, this planning assumption contributes significantly to the company supply-demand balance and proposal for investment. The company needs to present sufficient and convincing evidence that the headroom allowance is appropriate in both the short and long term, is not driving unnecessary and high regret investment, and that it has properly accounted for interactions with adaptive planning.	We have added text to Chapter 3 Section 3.9 to note that the headroom allowances for the individual company zones have decreased across the board since the draft report. This has been re-assessed following application of the latest final WRMP24 demand and supply forecast data, and to explain the impact of climate change and demand uncertainties in the future forecasts for the zones with the highest headroom allowances.
213	Ofwat	A robust assessment of current and future water needs is critical as it drives the gap between supply and demand and therefore drives the scale of investment required for the 2025-30 period and beyond.	Thank you for your comment which we fully agree with. Please see our revised Chapter 4 Section 4.3 for detail of how we forecast demand.

57	Ofwat	Dŵr Cymru has provided an explanation of the impacts of the covid-19 pandemic, including the 'staycation' effect, and demand returning to normal by the start of AMP8. Undertaking sensitivity analysis on these assumptions for the final WRMP would better evidence and justify the starting position of the WRMP24 supply demand balance.	Thank you for your comments. We have used latest information from our APR2022/23 to understand the latest demand position and with demand returning back to close to normal then these assumptions would not significantly impact either our demand forecast or our preferred demand management strategy.
29	Ofwat	The company's draft WRMP presents a 2029-30 business demand level that is 3% higher than the 2019-20 baseline level. ⁵ We have previously highlighted the opportunity for companies to deliver business demand reductions and our expectations for WRMP24 are that companies deliver significantly improved levels of water efficiency in the business sector. ⁶ We expect the company to set out and clearly justify an ambitious strategy for non-household demand reduction in its final WRMP to inform its PR24 business plan. We also expect the company to explain how the revisions it intends to make to its non-household consumption trend have impacted the optimisation and best value option selection in its preferred plan	Please see Chapter 4, Section 4.5.7, where we have added information on our plans from AMP8 to increase our support and commitment to Non-household customers in improving their water efficiency to reduce usage and any wastage of water.
30	Ofwat	In addition, the company does not provide any costs for the work it intends to do in order to reduce non-household consumption and it should do so in its final plan.	The costs to deliver the NHH demand reduction element of our preferred Plan are summarised in Section 6.7.1 with the options and their associated costs detailed in the accompanying planning tables.
46	Ofwat	The company has stated to us that it is committed to delivering its PR19 leakage performance commitment level and provided a revised profile of leakage reduction. We are concerned however that, based on the draft WRMP data tables, the company does not forecast to deliver its PR19 performance commitment levels for PCC by 2024-25.	We have revised the text in Chapter 1, Section 1.3.5 to update on the delivery of our WRMP19 and PR19 commitments.

87	Ofwat	We welcome the ambition of the company to achieve a 50% reduction in leakage from 2017- 18 levels by 2050 but, as mentioned above, we note that this is subject to the company's ongoing review of its water balance methodology. This review is likely to affect its leakage and PCC data. The company should reflect the outcome of this review in its final WRMP, and it should also consider whether this has a material impact on the WRW regional plan.	We have revised Chapter 4 to describe the impact of the water balance re-statement. The demand forecast has fully reflected the outcomes of this and have re-confirmed our commitment to achieve the long-term demand reduction targets that were set in our Draft WRMP24. The re-statement does not materially impact the preferred investment programme between the draft and revised draft Plans. This remains relatively straight forward with our demand management strategy remaining the same as do the schemes to resolve zonal drought resilience.
88	Ofwat	The company has not discussed its policy with regards to customer supply pipe leakage. We are encouraging companies to evaluate the benefits of a common industry approach to addressing leakage on customers own pipes. We expect companies to provide a view on the benefits of a common industry approach in their statements of response and final WRMPs. We will support companies in the development of a common approach but expect the industry to lead on the development. The Water UK leakage route map to 2050 committed to an informed debate on customer supply pipe strategy by December 2022.7	Our draft Plan was light on the details of our customer supply pipe leakage approach and so we have included additional text in our demand Section 4 and more specifically Section 4.6.1 and our Preferred Plan 6.3 to address this.
20	Ofwat	The draft plan explains the optimisation process used to derive the preferred programme, including used of advanced decision support tools. While the best value decision tool is described, there is little narrative around company level programme appraisal and decision making. We would like the final plan to provide more narrative of the approach taken to selecting the preferred programme.	We agree that this was not adequately addressed within the draft Plan, so we have fully updated both Chapters 5 and 6 to provide more detail our decision making approach at both a zonal and company level and how we have derived our preferred plan from this process.

21	Ofwat	In the best value analysis, the draft plan has fully considered the carbon impact, natural capital and other benefits that the options can deliver. The draft plan addresses some known issues and future uncertainties tested against a suitable range of scenarios, particularly in relation to climate change.	Thank you for your comment.
22	Ofwat	Dŵr Cymru has not referred to Ofwat's public value principles. We would like Dŵr Cymru to use Ofwat's public value principles, and to reflect expectations set out in the PR24 final methodology, within its best value planning process in its final plan, and to explain how these have been used to inform best value decision making. The plan notes that there are some uncertainties and scenario testing that remain outstanding for future work.	We have added reference to these Principles in section 1.2.1 which are built into regulatory guidance and guiding principles. We have used these throughout the Plan in considering social and environmental value, within our engagement and collaboration with other organisations including WRW and through being insightful, particularly around the link between our performance in the drought of 2022 and link to the resilience needs of the Plan.
23	Ofwat	The draft WRMP does not clearly present the benefits of the least cost plan against its preferred plan and any other plans. The draft plan, therefore, does not clearly present the evidence that the proposed solution represents best value for customers, the environment and society in the long term. The company has not presented the costs and benefits of the proposed solution against best value metrics. The plan does not provide a clear comparison and justification of the cost difference between the least cost and best value programmes. The difference in expenditure is not clearly stated and cost drivers are not fully explained. These point should be resolved in the final plan.	We have fully updated Chapters 5 and 6 to provide more detail of our decision-making approach across all elements of our preferred plan in order to identify the 'best value' programme of investment.
25	Ofwat	While we recognise that plans will develop over time and that costs and benefits may be refined, we are concerned	We have added significant additional information around the various decision/optimisation stools used within our

		<p>that the company is not demonstrating sufficient evidence that it has a confident and accurate understanding of the efficient costs and benefits associated with the delivery of its plan. If costs and benefits of options are to change significantly then this will impact the decision-making process and the justification for the optimised preferred programme consulted upon in the draft WRMP. For its final WRMP, we expect the company to clearly explain any changes to costs and benefits presented for the preferred plan from those presented in its draft WRMP. The company should provide sufficient and convincing evidence on the reasons for changes and explain how these have impacted the decision-making and optimisation process that produced its final WRMP preferred programme.</p>	<p>planning process to both better understand costs and benefits, particularly around our demand management options. Chapters 5 and 6 provide significantly more detail than in the draft Plan, around how these costs and benefits have been used decision making approach across all elements of our preferred plan in order to identify the 'best value' programme of investment.</p>
26	Ofwat	<p>The company has identified £148 million of enhancement expenditure relating to delivery of its draft WRMP in the 2025-30 period. Over the 2025-50 period the company has identified a requirement for over £439 million of enhancement expenditure. For this investment, Dŵr Cymru plans to deliver 112 Ml/d of supply demand benefit (excluding interconnectors) in 2025-30. Overall, the company proposes to deliver benefits at a lower cost in comparison to other companies. 12. We would expect Dŵr Cymru to clearly set out the specific wider reasons for projects are being selected as preferred, in cases where unit costs are high and other similar projects appear to present better value.</p>	<p>As above, we have fully updated Chapters 5 and 6 to provide more detail of our decision making approach across all elements of our preferred plan in order to identify the 'best value' programme of investment. It is clear that we gain very good value from our network enhancement schemes which make best use of existing water resources across then SEWCUS and Tywi Gower WRZs from which a large percentage of our Plan benefit is derived, particularly within the AMP8 period.</p>
27	Ofwat	<p>The company should ensure that its costs are sufficiently evidenced in its final WRMP and provide convincing</p>	<p>As above, we have fully updated Chapter 6 to provide more detail of our decision-making approach across all elements</p>

		evidence that the preferred options being selected, across all areas of its plan, are best value in its final WRMP24 and ensure costs are reliable, efficient and appropriately allocated.	of our preferred plan in order to identify the 'best value' programme of investment.
215	Ofwat	The company's supply demand balance starting point for the draft WRMP24 is lower than its forecast for the same point in the final WRMP19. The company has provided limited high-level information regarding the reasons and appropriateness of the changes to components of the supply-demand balance. This means that there are some concerns that the overall outcome of the WRMP19 as funded at PR19 has not been delivered in the round. The company should fully quantify and justify the reasoning for changes between WRMP19 and the starting point for WRMP24 at a supply-demand balance component level with sufficient and convincing evidence. Where a step change in supply-demand balance between WRMP19 and WRMP24 is not sufficiently justified as being due to changes to scenarios or planning assumptions, and may instead be as a result of non-delivery or underperformance, this will be taken into account at PR24 in the assessment of enhancement funding.	We have updated Chapters 3 and 4 to include more detail around the variation in starting points for both our supply side and demand side assessment compared to our WRMP19 position. Section 3.2.1 table 8 provides additional information around supply capability incremental changes since PR19 which are also reflected within the zonal summaries Appendix. Chapter 4 summarises demand changes which are reflected within the accompanying tables.
221	Ofwat	There is limited evidence provided that the benefits of funded PR19 activities have been appropriately factored in to the draft WRMP24 baseline supply-demand balance. Dŵr Cymru has given some commentary on individual WRZs and what has changed since WRMP19, including schemes and their subsequent impact on supply demand balance. However, the company should provide granular details of the benefits of funded schemes and how and	As above, we have updated Chapters 3 and 4 to include more detail around the variation in starting points for both our supply side and demand side assessment compared to our WRMP19 position. The benefits of the supply side schemes have been included with Deployable Output values at the correct positions in AMP7 as a lead into the Plan. We have provided a commentary about these in the zonal summaries and the DO report - appendix 6. We also

		when these have benefitted the baseline supply-demand balance. Where a step change in supply-demand balance between WRMP19 and WRMP24 is not sufficiently justified by scenario drivers, and may instead be as a result of non-delivery or underperformance, considerations will be made at PR24 in the assessment of enhancement funding.	report on the delivery of these within the APR and WRMP annual reviews.
217	Ofwat	The key drivers to the planning problem are described in the draft WRMP. However, an explanation of the supply demand balance and quantifying the impacts of the drivers at a company level has not been set out in the draft WRMP itself. Without this, a final WRMP would not clearly justify the levels of investments in the company business plan.	We acknowledge that our draft WRMP24 did not address your pre-consultation response which asked that we set out the drivers for our supply demand position. We have now added in Section 6.1.2 to our revised WRMP24 which describes the position at both a company and regional level.
134	Ofwat	Table 4 of the draft plan sets out a total of 170 supply and demand management unconstrained options, with 123 screened through to the feasible, and 98 selected in the preferred plan. This includes larger scale supply and demand options over 10 Ml/d, 12 catchment management options, and a third party option (Aberthaw power station). The capacity of the feasible options could cover the forecast water needs comfortably. However, all feasible demand options are selected in the final plan, and only 23 feasible supply options are not selected for the preferred plan. We are therefore concerned that Dŵr Cymru has not considered a sufficient number and range of feasible supply and demand options in relation to the problem it faces. Identifying an appropriate number and range of options to meet water needs is essential to ensure that customers and stakeholders have confidence	For the revised Plan we have now appraised a full range of demand management options across metering, leakage, HH and NHH water efficiency interventions. These are summarised in section 5 with the details of these options presented in the planning tables and in the new appendices 25 and 26.

that the preferred programmes are optimal. The number of feasible supply options is particularly concerning when broken down by individual water resource zones in which the company forecasts deficits: Hereford (1 feasible option), Tywi Gower (5 feasible options), Mid and South Ceredigion (6 feasible options), and South East Wales Conjunctive Use System (SEWCUS) (16 feasible options). The number and range of feasible options is important to undertake a meaningful best value assessment that justifies the options selected in the preferred plan as best value. Dŵr Cymru should address this in its final plan by providing a greater number, range and scale of options to its decision-making process, or by providing robust evidence why there are no feasible options that provide better value to the wider set of metrics compared to the options that are selected for the least cost plan.

106

Ofwat

The company explains that it intends to use a policy of progressive meter installation that, by 2030, will see the penetration of meters increase from 50% to 75% with the number of household customers receiving a metered charge increasing from 50% to 65%. The company plans to use automated meter read (AMR) meters initially instead of advanced metering technology (AMI) meters and proposes bringing in compulsory metering from 2040-41 onwards.

In its final WRMP the company should present the cost benefit of both technology types to provide confidence that the proposed metering programme is optimal. The company needs to provide sufficient and convincing evidence that the initial AMR rollout, with a move to AMI

We have updated Section 6.2.1 to provide more justification for our preferred metering strategy, including a comparison of the benefits of AMR vs AMI. We have now developed a detailed metering delivery model and undertaken optimisation and scenario testing to develop a preferred delivery Plan. Section 4.5.2 also provides additional information around our customer metering strategy.

		in future years, is efficient and provides a best value strategy for customers. It should also provide more unit costs and, for example, more granular information on the cost and benefit forecast from each AMR and AMI meter.	
108	Ofwat	For the final WRMP, the company should provide further detail of its decision-making framework, as well as sufficient and convincing evidence to justify why the preferred metering option is best value from a technology and timing of investment perspective. This should clearly refer to any relevant factors that are unique to Wales.	We have updated Section 6.2.1 to provide more justification for our preferred metering strategy, including a comparison of the benefits of AMR vs AMI. Section 4.5.2 also provides additional information around our customer metering strategy.
144	Ofwat	The draft WRMP data provided by the company to date indicates that it is proposing a three year average PCC reduction over the 2025-30 period that will deliver a level of PCC 9.1% below the 2019-20 baseline by 2029-30. This represents a further reduction of only 2.8% beyond the company's 2024-25 performance commitment level of 6.3%. As the company further develops its forecast PCC performance trend from draft WRMP to final WRMP it should include the reasons for changes and explain the impact of any revisions on the optimisation and best value option selection in its preferred plan. We expect the company to provide sufficient and convincing evidence in its final WRMP to justify why its selected targets for demand reduction represent the best value approach to meeting a supply-demand balance or delivering longterm strategic outcomes.	We have made significant changes to Chapter 4 of our Plan which explains our metering and leakage strategies and the tools that are now available to us to better optimise and develop our Preferred Plan including demand management outcomes. Chapter 6 then provides full detail of our decisions in developing the preferred plan in order to identify the 'best value' programme of investment.
145	Ofwat	In addition, for its final plan the company should clearly explain why its dry year annual average (DYAA) forecast for PCC is lower than its normal year annual average	In Table 2 of the WRMP Tables, the Normal Year PCC values presented for row 2NY (Average Household - PCC) are lower across the planning period than those presented for

		(NYAA) forecast from 2029-30 onwards. This is unusual because we expect PCC to be higher in dry years than in normal years.	the Dry Year PCC in row 2BLW (Average Household - PCC). The Dry year PCC values presented in row 2FPW (Average Household - PCC) are lower but then these are 'Final Plan' values rather than 'Baseline' and so include the benefits of demand management interventions
146	Ofwat	As referred to above, the company is undertaking a review of its water balance methodology. This work is ongoing, and the company has told us that it expects to complete the review in April/May 2023. This review will affect not only data reported annually as part of the annual review process, but it is likely to require the company to revise its WRMP forecasts accordingly. The company should reflect the outcome of its review into leakage and PCC methodology in its final WRMP and it should consider whether this has a material impact on the Water Resources West (WRW) regional plan.	As above, we have fully reflected updated demand forecast in line with the water balance re-statement and we have fully Chapter 4 which re-confirms our commitment to achieve the long-term demand reduction targets that were set in our Draft WRMP24.
135	Ofwat	The preferred plan sets out a twin track approach of supply and demand options. Approximately 82% of the additional gained WAFU in the preferred plan is attributed to demand options, with the remaining from supply options focused on the four WRZs that are forecast to fall into deficit along the planning horizon. In these four water resource zones, 81% of the forecast deficit is addressed by six supply options, covering 3 types of supply options (upgraded pumping stations, water treatment works capacity increase and surface water enhancement). As these relate to upgrades to current assets Dŵr Cymru should provide sufficient and convincing evidence that the additional abstraction will be available from these sources in drought conditions,	Our supply assessments are based upon our industry standard and audited AQUATOR models which have been used to assess the impact of utilising additional water from the available resources and resilience within the deficit WRZs. We have included additional text in Section 6.5 to confirm that the preferred supply side schemes will provide the required levels of supply resilience during extreme drought events. Appendix 13 details the engineering work that was undertaken during the option development stage and the enhancements required to our networks across the SEWCUS and Tywi Gower zones to allow these options to deliver the benefits in supply. The schemes provide additional capacity above that currently available. We have included detail around scheme utilisation in Section 6.5.2-3

		how its inability to currently fully utilise is not a result of poor maintenance of the sites, and that future base maintenance savings of any upgraded assets at these locations have been accounted for in programme costs.	
137	Ofwat	Dŵr Cymru has not provided sufficient information regarding option utilisation in its draft plan. Extra information was provided to Ofwat on utilisation after querying. We require more robust evidence on utilisation in the WRMP, in line with feedback in our pre-consultation feedback letters to fully explain and justify the utilisation rates given and to provide evidence that modularity and scalability in optioneering has been fully considered and explored to manage low utilisation situations. We would like to see more evidence in the final plan that operational interventions have been considered and will be implemented where appropriate if this is the best value solution.	As above, we have now included narrative and tabulated information showing scheme utilisation for the preferred supply side options selected for the SEWCUS and Tywi Gower WRZS, in Chapter 6, Sections 6.5.2 and 6.5.3.
70	Ofwat	There has been limited engagement with retailers ahead of developing the draft WRMP. Dwr Cymru should provide evidence in its final plan to demonstrate how the views of retailers have been considered.	We acknowledge that our customer engagement for this Plan focussed primarily on household customers, with limited engagement with water Retailers. However, the open water market in Wales is very different to that in England with only those business customers using >50MI being eligible. As a core member of the Water Resources West regional group we are involved in their engagement programme which has incorporated more work with retailers and so any outcomes of this that were useful for our company Plan have been incorporated.
71	Ofwat	No details of opportunities to enable co-funding or co-delivery have been identified. Further investigation of partnership opportunities for co-funding and co-delivery	The delivery of our large programme of NEP environmental investigations in AMP8 will be co-designed with NRW to ensure they achieve the desired outcomes and satisfy the

		with stakeholders should be undertaken and set out in the final WRMP as well as exploring commercial models.	requirements of the Environment (Wales) Act. The studies themselves will provide opportunity for co-delivery with a range of parties, particularly the Rivers Trust which we provide the basis for future potential co-delivery of solutions where these are required. This is an extension to a number of projects that we are currently working on with our partners.
60	Ofwat	We welcome Dŵr Cymru's intention to reduce leakage by 50% by 2050 from a 2017-18 baseline. We also welcome the fact that, in its draft WRMP narrative, the company states that it has set challenging targets to support its domestic customers to reduce their average use to 110 litres per person per day (l/h/d). However, the dry year annual average (DYAA) PCC values shown in the company's tables for 2049-50 is 113.5 l/h/d. In its final WRMP the company should clarify its plans for PCC to reach 110 by 2050 and it should demonstrate how much of the forecast PCC reduction relies on Government-led initiatives.	For our revised WRMP24 we have clarified that we aim to achieve the 110 l/h/d target under the dry year annual average scenario and have adjusted our forecast demand to reflect this. Within Section 6.2 we set out a breakdown of how at a company level we plan to achieve our long-term demand management strategy, which includes the assumed benefits from Government introducing its mandatory water labelling scheme.
61	Ofwat	Dŵr Cymru has been reviewing its water balance methodology and is engaging with us to ensure its data is compliant with the guidance. This review may affect the data reported annually as part of the annual performance report (APR) process and is also likely to require the company to revise its WRMP forecasts. Once this review is complete the company will need to revisit its WRMP forecasts for leakage and PCC to see whether it still forecasts a leakage reduction of 50% (from a 2017-18 baseline) and a PCC of 110 l/h/d by 2050.	As in response to a number of queries, our demand forecast for the revised draft WRMP24 has been updated to incorporate the outputs of the water balance re-statement. The revised forecast still includes our long term targets of a 50% reduction in leakage and achieving a PCC of 110l/h/d by 2050.
63	Ofwat	We are concerned that the company's draft WRMP	For the revised Plan we have now appraised a full range of

		provides insufficient evidence of demand reduction target testing and optimisation. The company should provide further explanation of its decision making and justification for the selected demand reductions in its final WRMP. In addition, the company should demonstrate that it has considered a sufficient number of demand management options as it appears to have only appraised four at a company level. We expect the company to either assess more demand management options or provide sufficient and compelling evidence why it has not done so.	demand management options across metering, leakage, HH and NHH water efficiency interventions. The details of these options are presented in the planning tables and in the new appendices 25 and 26. Chapter 4 and 5 summarise the water efficiency and leakage options that we have now consider for comparison with the programme of demand management presented in our draft Plan. We have updated Chapter 6 to support our decisions around the achievement of company level demand management targets.
64	Ofwat	The company's draft WRMP provides few costs for water efficiency options, metering, leakage or business demand reduction options. The draft plan also does not provide disaggregated unit costs for demand management options such as domestic water efficiency or business demand options. We expect the company to provide these costs in its final WRMP.	Our revised draft Plan now contains full cost information for all components of our demand management strategy. The detail of these options is provided at a zonal level within the supporting planning tables.
223	Ofwat	Clywd Coastal WRZ still experiences a small deficit at the start of the planning period and Dŵr Cymru will need to demonstrate what additional measures it will need to take in this zone during this period.	We have reviewed our supply demand balance assessment for the zone in light of our planned AMP7 leakage reductions and confirm that we are not forecasting any deficits in the Clwyd coastal WRZ. We have also tested the zone against a wide range of potential futures and in light of findings we have an adaptive pathway which includes the development of a new link main between the Alwen and Clwyd supply zones. We propose to complete design work on this scheme in AMP8 in case this is required later in the planning period.
14	Ofwat	Dŵr Cymru's draft plan meets requirements on decision making in some areas, however there are weaknesses	We have fully updated Chapters 5 & 6 to provide more detail of our decision-making approach across all elements

		<p>that should be addressed to provide evidence that all aspects of decision making are robust and in line with the Water Resources Planning Guideline (WRPG). The plan provides line of sight from best value metrics to plan objectives, however the final plan should provide clearer explanation of how it aligns with the Water Resources West regional plan where relevant. An explanation of the approach to uncertainty is provided, including the decision to not adopt adaptive planning. However, we do not consider the draft plan provides a sufficient justification for this decision, and therefore hold concerns that adaptive planning has not been adopted.</p>	<p>of our preferred plan in order to identify the 'best value' programme of investment. Sections 6.6 and 6.7 provide more comprehensive information on the level of scenario testing that has been completed and how this has led to a number of alternative pathways being developed.</p>
15	Ofwat	<p>The company identifies several future uncertainties in the plan, such as the impact of climate change on the timing of demand side interventions, the impact of potential abstraction reductions in AMP9 and beyond, and the need for an internal transfer in the Clywd zone. We expect the company to consider accounting for these uncertainties through alternative pathways.</p>	<p>As above in relation to query 223, Sections 6.6 and 6.7 have been revised to provide more comprehensive information on the level of scenario testing that has been completed and how this has led to a number of alternative investment pathways being developed.</p>
16	Ofwat	<p>Dŵr Cymru does not propose any difference between its core and most likely pathways. It states that its core pathway 'outlines the necessary investment to meet the company's longterm strategic objectives if there are no changes to operating environments in the future', and that it is based on a low climate change scenario, with its preferred pathway based on a medium scenario. However, the core pathway should not be based on an assumption that low scenarios will come to pass. It should set out low-regret investments that will be required across a wide range of plausible future</p>	<p>Sections 6.6 and 6.7 have been revised to provide more comprehensive information on the level of scenario testing that has been completed and how this has led to a number of alternative pathways being developed and a statement of 'Core' vs alternative investment pathways.</p>

		scenarios, including those required to keep future options open. In its final plan, we expect the company to present a core pathway in line with the WRPG definition, which includes low-regret investment to meet future uncertainties and additional option value to allow further flexibility in the future.	
156	Ofwat	Dŵr Cymru has not presented an adaptive plan, as it states that its preferred plan continues to deliver outcomes in a wide range of scenarios. Even if it concludes that alternative pathways are not required, the company needs to demonstrate that scenario testing, including the common reference scenarios, has been used to identify low-regret investment that is required in all or most plausible futures.	We have taken on-board these comments on the need to present adaptive plans and have re-written Section 6 and more specifically Sections 6.6 and 6.7 to provide more comprehensive information on the level of scenario testing that has been completed and how this has led to a number of alternative pathways being developed.
155	Ofwat	The draft plan provides some sensitivity testing around the policy/decision making constraints. The preferred plan has been tested against a range of future scenarios and this is presented for each WRZ. Scenario sensitivity testing has not, however, been presented for alternative programmes. Sensitivity tests have been carried out to test the impact of different scenarios on the year in which the WRZs meet the 1-in-500 year level of drought resilience. However, sensitivity tests have not been carried out to explore the impact of changing the year of meeting the 1 in 500 year resilience target on costs and cost savings, or any other hard deadlines.	Sections 6.6 and 6.7 have been revised to provide more comprehensive information on the level of scenario testing that has been completed and how this has led to a number of alternative pathways being developed.
157	Ofwat	Dŵr Cymru states that it has tested its plan against the common reference scenarios and appears to be planning to test further scenarios to inform its final plan. The company should clearly explain in its final plan how or	Sections 6.6 and 6.7 have been revised to provide more comprehensive information on the level of scenario testing that has been completed and how this has led to a number of alternative pathways being developed. We have also

	<p>whether these scenarios impact on the allowance requested at PR24. The company should also clearly set out the impact of the Ofwat common reference scenarios compared to the 'most likely' scenarios on which the preferred plan is based. This should include quantifying the impact on demand of the low and high scenarios for climate change and demand across the planning period. The company should also quantify the estimated impact on the expenditure requirement of: 1) planning based on the high scenarios for climate change and demand, and the slower scenario for technology; and 2) planning based on the low scenarios for climate change and demand, and the faster scenario for technology.</p> <p>This will allow for improved understanding of the drivers of investment, the sensitivity of the plan to future scenarios and confidence in the investments being proposed. The company should use the results of this testing to identify and justify, with sufficient and convincing evidence, low regret investments, rather than just those that meet both high and low planning needs in a non-adaptive way.</p>	<p>included indicative costs around these pathways which provide valuable information on the potential investment impact of alternative futures.</p>
<p>136</p>	<p>Ofwat</p> <p>Options information in the WRMP tables is lacking with missing Water Available For Use and Total Net Present Costs data. For the final plan WRMP, and to carry through to PR24, we expect all options to be worked to the same level of detail, in order to allow the decision making tool to select an unbiased preferred best value plan, option portfolio. This is particularly important to carry through to business plans, to justify level of investment is appropriate to the challenge and for customers.</p>	<p>We have updated the information within the WRMP tables to address these concerns and ensure they provide the required information.</p>

6.2. Responses from environmental groups, community groups, and charities

Reference	Consultee	Feedback	DCWW reply/action
10	Afonydd Cymru	Future options for a transfer from the Alwen-Dee zone would require a full hydrological review during AMP8. Afonydd Cymru requires therefore action to be undertaken in terms of a full review of the existing permits on the River Dee to ensure that the Habitats Regulation requirements are met, before any consideration for new abstraction	The potential option being considered would utilise existing licences and resources within the Alwen-Dee zone, as operated in accordance with the Dee General Directions, and so would not require any new abstraction to be made.
126	Afonydd Cymru	We are concerned that Welsh Water has adopted an approach to Biodiversity that is not consistent with WG requirements. These comments apply directly to the Natural Capital Approach report, that includes biodiversity, but carry over to the main report text and the approach to the Strategic Environmental Assessment.	<p>The Welsh legislative requirements in The Well-being of Future Generations (Wales) Act 2015 and The Environment (Wales) Act 2016 are detailed in Section 1.8 of the Environmental Report. Section 6.5 of the Environmental Report outlines the contribution of the Draft WRMP to Wales’s Well-being Goals and the Objective for the Sustainable Management of Natural Resources. The elements of ecosystem resilience as set out in the Environment (Wales) Act 2016, have been considered in the baseline/key issues section for biodiversity within the Environmental Report.</p> <p>The presentation of the NCA findings will be revised to ensure appropriate alignment with the Welsh Government ‘Guiding Principles for Developing Water Resource Management Plans’ and specific NC requirements.</p>
126a	Afonydd Cymru	Biodiversity has been considered in terms of Biodiversity Net Gain. This approach is adopted in England only. In Wales, the duties for biodiversity are outlined in Section 6 and 7 of the	The NCA approach supports analysis in both England and Wales (as it was derived from a WRW/WRMP24 approach); however, the presentation of the findings will be revised to ensure appropriate alignment with the Welsh Government ‘Guiding

		Environment Act (Wales) 2016 and translate into a wider duty to promote and enhance ecological resilience. The approach supported by WG is one of Net Benefits for Biodiversity (NBB) and is supported by the DECCA framework.	Principles for Developing Water Resource Management Plans' and specific NC requirements.
126b	Afonydd Cymru	The Defra Biodiversity Net Metric (as applied by Welsh Water in the Natural Capital Approach) is not legislated in Wales and does not account for ecological resilience. As a minimum, we would expect Welsh Water to demonstrate within their approach how the DECCA framework has been applied (Diversity, Extent, Condition, Connectivity and Aspects).	The presentation of the NCA findings will be revised to ensure appropriate alignment with the Welsh Government 'Guiding Principles for Developing Water Resource Management Plans' and specific NC requirements.
126c	Afonydd Cymru	Afonydd Cymru have made these comments to Welsh Water on a number of plans that you have published for consultation. It is imperative that the requirements under Welsh legislation are clearly understood and applied to ensure that Welsh Water delivers its legal requirements for biodiversity. Specifically, for delivery, no net gain % should be applied in Wales and Welsh Water should be seeking to maximise biodiversity improvement from land purchase stage. We see no evidence currently across Welsh Water's functions which supports this and it has been raised as part of Independent Environmental Advisory Panel feedback on several occasions. Having said that, due to the nature of Welsh Water's proposals we do not consider this	Comment noted.

		oversight to have a major impact on the conclusions of the assessments. The only option which this would impact would be TWG014 and then its impact is only of a minor scale. It does, however, have more significant impact to Welsh Water's overall business planning mechanism.	
40	Afonydd Cymru	We expect any agreement for supply to the canal to ensure that leakage and demand management are key to resolution of the agreement, from both parties	Our WRMP24 is clear that demand management is a key component of our long term strategy to enhancing our levels of drought resilience and in providing benefit to the environment. It would be the responsibility of NRW/WG to ensure that CRT manage their demand for water as efficiently as possible and is not something we can influence.
65	Afonydd Cymru	We question whether Welsh Water has thoroughly considered critical periods across all its Water Resource Zones. there are clearly other zones dependent upon limited water resource options where we consider that a drought accompanied with a peak demand would cause water supply issues.	We have added commentary in Chapter 2 Section 2.2.2 to explain that our experience in 2022 significantly tested our peak week supply capability and that as such we are confident that we do not need to investigate any additional zones for critical period planning concerns above those identified in our draft WRMP24 .
226	Afonydd Cymru	Afonydd Cymru will provide a full response on the Water Resources West Strategy separately to this consultation.	Noted.
1	Afonydd Cymru	We would welcome Welsh Water undertaking some detailed analysis of how early and more proactive communications could change customer behaviours. We also believe Welsh Water should more proactively consider the impact of non-household customer demand during droughts from recent 2022 evidence.	We are part of an UKWIR project to review the benefits seen from companies' demand management activities during 2022 and this will help us understand whether there is any further benefit that could be gained from earlier communications. Our revised Plan sets out our strategy for reducing non-household demand.
4	Afonydd Cymru	Providing more holistic, catchment approaches to	We are seeking funding in AMP8 to investigate the potential

		the overall demand would assist in reducing pressures on mains supply, dampen peak demand effects and provide Welsh Water with longer term security. It would also enable Welsh Water to deliver against wider SMNR, biodiversity and natural capital approaches.	benefits of nature-based solutions to water resources which will allow us to be more confident in taking these type of schemes forward into AMP9 and beyond. Whilst there is good reasoning why these schemes should provide benefit, the evidence to take these forward as preferred options in place of, for example, demand management is currently not as strong as needed.
5	Afonydd Cymru	We would expect investment to be identified which directly resolves all WFD failure by 2027. This is a statutory duty of both NRW and Welsh Water. Any future changes to abstraction licences would need to review the impact of the current licensing regime against any future proposed solutions to adapt to those changes	We are working with NRW through our NEP for AMP7 and AMP8 to address the identified risks from our raw water sources to the achievement of WFD objectives. Primarily this is focussed on those waterbodies designated as Heavily Modified and improving the management of gravels below our impounding reservoirs, with trials set to complete by 2024 leading to implementation from 2025 onwards.
67	Afonydd Cymru	We would welcome further detail from Welsh Water as to how the Brecon Beacons Mega Catchment and the Dee LIFE project have delivered the environmental destinations specifically for water resources as we do not consider these as examples which deliver the outcomes required. We very much support Welsh Water's overall approach to not wait for NRW to deliver this review and ensure enhanced leakage and demand management is in place.	We have added text to Chapter 2 Section 2.3.3 to better link how these two examples of Welsh Water's environmental programmes align with the principles of SMNR.
48	Afonydd Cymru	We would urge Welsh Water to look at our wider comments in relation to demand which we think would be significant in West Wales water resource zones.	As described in Chapter 6.2 we are targeting our smart meter programme to our West Wales zones as we know there have been concerns around level of demand in this area and so we want to proactively make inroads into better understanding, and ultimately reducing, the level of demand from leakage and customer usage.
49	Afonydd Cymru	We ask that Welsh Water engages with Afonydd	The preferred option for Herefordshire assumes that existing

		<p>Cymru and the Wye and Usk Foundation on these proposals once the requirement is more clearly understood. We believe further work is required on demand management in the zone.</p>	<p>abstraction licence limits are maintained. Given these maximum volumes were reviewed and agreed to be sustainable during the RoC process for the River Wye, there should be no detrimental impact to the environment. As we undertake further environmental investigation in AMP8 into this particular scheme, we will engage with Afonydd Cymru, particularly around any options appraisal that may be required.</p>
232	Afonydd Cymru	<p>Forecasting Non-Household Demand – the method for demand seems to be based upon a Wales level assessment and based upon previously observed consumption. This approach causes some concerns when applied to forecasting future demand patterns. Previous consumption and changes in behaviour will not necessarily represent how demand will change. We would suggest that further work is considered in this area to ensure that the wider impacts are considered. Priority should be given to non household properties that potentially move over to mains supply during droughts, and the necessary measures to provide demand management in those sectors</p>	<p>We have included more information around how we forecast non-household demand within Chapter 4.3.2.</p>
79	Afonydd Cymru	<p>We are not clear from the information presented how Welsh Water intend to implement the required leakage reduction. Therefore, we would ask Welsh Water to provide further information within their plan as to how customer side leakage reduction will be achieved.</p>	<p>We acknowledge that the draft Plan contained very limited detail on our leakage strategy and so in the revised Plan we have addressed this comprehensively through additional text in the main report (please see section 4.6.1) and by the inclusion of new appendices related to our demand management strategy.</p>
80	Afonydd Cymru	<p>We would suggest Welsh Water should develop an alternative contingency programme within</p>	<p>We agree with the need for robust sensitivity testing of our preferred Plan and so Section 6.6 of Chapter 6 has been</p>

		their plan should changes in Wales policy or in customer delivery not be reached. This sensitivity testing would ensure funding is in place to maintain the required leakage reductions and that the leakage glide path can be met.	significantly revised since the draft Plan to ensure this provides assurance to our customers and stakeholders.
81	Afonydd Cymru	Many of the figures in this section are difficult to see. Figure 49 has no y-axis or labels.	In revising our Plan we have updated most of the figures so hopefully these are now clearer.
82	Afonydd Cymru	It is not clear from the WRMP how Welsh Water envisages customer side leakage reduction being achieved. How is it envisaged that the repairs and replacements necessary to achieve the leakage reductions required will be implemented?	We acknowledge that the draft Plan contained very limited detail on our leakage strategy and so in the revised Plan we have addressed this comprehensively through additional text in the main report (please see section 4.6.1) and by the inclusion of new appendices related to our demand management strategy.
89	Afonydd Cymru	Whilst we welcome the continued glidepath to reduce leakage, targets for leakage delivery should not be set to a baseline in 2017/18. This would ignore new leakage which develops and does not provide the overall reduction in leakage which needs to be achieved.	Although the target is defined as a % reduction from 2017/18 levels, this ultimately translates into a volumetric reduction that our performance will be judged against, therefore setting to an earlier baseline position such as 2017/18 makes this more difficult to achieve if we do see a breakout of significant new leakage.
139	Afonydd Cymru	We remain concerned that there is insufficient ambition on per capita consumption. A step change in water efficiency, advice, labelling and metering needs to be implemented in Wales. Whilst some of this is outside of Welsh Waters control, we do not see an ambitious plan to drive this by the Company.	Our draft Plan contained a commitment to reduce our average per capita consumption to 110 l/h/d by 2050, however, we acknowledge that we did not set out the full details all the water efficiency activity that would be required to achieve this target, notably the company-led activity from 2040. Our revised Plan sets out fuller detail of how we will achieve this ambitious target through a combination of smart metering, government implementation of water labelling and our company-led water efficiency activity.
140	Afonydd Cymru	Project Cartref could be extended to ensure that further outcomes are achieved. We also	We are intending to upscale our Cartref programme in AMP8 to support the delivery of our long term water efficiency targets

		suggested that more focus could be made on water efficiency and demand management engagement as part of the school's programme which Welsh Water lead.	and have included further details within Sections 4.5.5 and 4.5.6.
198	Afonydd Cymru	We would expect Welsh Water, in conjunction with NRW, to undertake a full review of the environmental requirements of the river Tywi before implementing any changes to licence conditions.	Our preferred schemes in the Tywi Water Resources Zone do not require any changes to our existing abstraction licence conditions
194	Cadw	Based on the limited information available, Cadw note that a number of the proposed works will have an adverse impact on the Cultural Heritage and Cadw expect to be fully consulted on these proposals before any detailed planning is carried out.	The SEA identifies construction and operational effects of the revised feasible and preferred options in the Draft WRMP24. The effects on cultural heritage are recorded against the SEA Objective 16 'To conserve and enhance the historic environment including the significance of heritage assets and their settings and archaeological important sites' and the supporting guide questions. In determining effects, consideration has been given to a range of potentially sensitive designated cultural heritage sites and features included World Heritage Sites, Schedule Monuments, Listed Building and, Historic Parks and Gardens. Cadw (or if located in England, Historic England) and local authorities have responsibilities for such sites. Where preferred options are taken forward, and if effects on cultural heritage are identified, the appropriately responsible body will be consulted.
42	Canal and River Trust	We believe the Trust can play a significant role supporting the water sector as it strives for resilience and affordability in delivering public water supply. Our waterway infrastructure already exists and with investment from the sector could unlock resilient and cost-effective	Thank you for your feedback and we remain committed to working closely with the Trust to support each other in achieving sustainable use of water resources.

		water transfer schemes across England and Wales.	
43	Canal and River Trust	Water transfers along our network can also support several other business sectors including the energy sector, agricultural sector, housing sector, construction sector, pharmaceutical sector and manufacturing sector. The water transfers can also support low carbon energy for heating and cooling.	Thank you for your feedback and we remain committed to working closely with the Trust to support each other in achieving sustainable use of water resources.
45	Canal and River Trust	We look forward to continuing working with Dŵr Cymru Welsh Water on the evaluation of these options accordingly.	Noted, thank you for your feedback and we look forward to working with you on our future plans.
44	Canal and River Trust	The Trust welcomes Dŵr Cymru Welsh Waters continued commitment to support the Monmouthshire & Brecon Canal anticipated demands in the Usk catchment by exploring alternative, cost reflective options. We understand that this additional water demand will be flagged in the Dŵr Cymru Welsh Water final WRMP24 (section 6.6.1, Draft WRMP24 Main Technical Report).	We confirm that we have modelled the impact of providing support water to CRT in our supply demand balance assessment for the SEWCUS WRZ, the results of which are provided in Section 6.10 of our revised Plan.
72	Waterwise	We may have missed finding additional customer facing materials, but the executive summary document was very text heavy and a lot of small print on the page. To engage more people in your plan this could benefit from a simple summary document with more images and diagrams. It could also be improved with the addition of signposting readers to Welsh Water's existing water efficiency information and opportunities to	To accompany the publication of our Final WRMP24 we will aim to produce a more customer facing summary document that will hopefully make our Plan more accessible.

		save water for their customers. At the point of engaging on these plans and drawing interest in the subject of water resources is an excellent opportunity to engage people with water efficiency. It would be great to see Welsh Water use the opportunity of the final plan promotion to do this.	
128	Waterwise	We are pleased that Welsh Water has included an understanding of future non-household PWS needs but the draft plan lacks options to reduce NHH water demand. This is a significant omission. This is important, especially in light of Ofwat's planned performance commitment (including NHH demand reduction). Welsh Water is a company that leads by example having achieved a Waterwise Checkmark for its head office and can promote this to its NHH customers.	Please see Chapter 4, Section 4.5.7, where we have added information on our plans from AMP8 to increase our support and commitment to Non-household customers in improving water efficiency to reduce their usage and any wastage of water.
206	Waterwise	It would be good to see the final plan reference the new UK Water Efficiency Strategy to 2030 which Welsh Water helped develop (and Welsh Water's education programme is included in the Strategy case studies). A small point, but section 4.4.2 on water efficiency seems to be in a strange hierarchy in the contents sitting under Leakage? Ensuring the information on your water efficiency projections is clearly laid out in this section would also be helpful, with graphs in the plan to help aid stakeholder understanding.	We have provided information on our Household Water Efficiency Strategy in Chapter 4 Section 4.5.6 which will be structured to ensure we are working towards the 10 Strategic Objectives identified through the UK Water Efficiency Strategy 2030. Information on Leakage is separated out in Section 4.6.
207	Waterwise	We welcome the reference to the Wales Water Efficiency Group within the plan and Welsh	Thank you for your comment, we will continue to work closely with the Wales Water Efficiency Group and Waterwise to

		Water's proactive contribution to this group that we manage. It would be beneficial to ensure it is clear this group includes wider stakeholders than just the Welsh Government. You may also want to engage with the group to include a summary of some key successes - such as recent inclusion in the Wales Quality Homes Standard of water efficiency measures. Do contact Jo Osborn at Waterwise to discuss this.	support the delivery of our ambitious water efficiency strategy.
208	Waterwise	Figure 47 (page 54) provides some significant concerns to us as it shows no company led interventions before 2044? This may be a misunderstanding but we would highly advocate that Welsh Water continues to build on the proactive approaches of its education programmes to date and ensure there are company led interventions ongoing. Page 46 is useful for seeing the activities planned at a high level, however we feel the plan could more clearly detail the context of the water efficiency activities and timescales for delivery. For example a table showing the number of home and school visits planned for each year of AMP8 compared to AMP7 would help get a scale of the work.	Please see Chapter 4, Section 4.5.6 for more detailed information on our AMP8 Water Efficiency Strategy. We plan to upscale our Project Cartref offering from AMP8 onwards.
209	Waterwise	We support the plan for home water audits. Although note this appears to be virtual only. Thames Water's smarter home visit programme which targets high users is delivering sustained	Please see Chapter 4, Section 4.5.5 for more information on our current activities to promote household water efficiency, and Section 4.5.6 for information on our AMP8 Water Efficiency Strategy, which does include Home Audits for high users.

		<p>savings of 70 litres per property per day and this may be appropriate to consider piloting in Wales. As a minimum we expect to see the company considering in the final plan the potential to scale up the Cartref programme x2 and x3 in AMP8. We also want to see Welsh Water expand its water saving audit programme to include non-household customers. Having detailed the demand expectations there appears to be limited action to reduce non-household use in the plan.</p>	
210	Waterwise	<p>Areas where we think additional investment could be considered and do not seem to be included in this plan is for targeted communications campaigns including:</p> <ul style="list-style-type: none"> - Funding to undertake or support a leaky loo campaign. The former could be progressed as a collaborative campaign on leaky loos with other water companies, the BMA and Waterwise as recommended in our position statement. - The company could consider offering a leaky loo fix, or a financial incentive to customers to get a leaky loo fixed to sit alongside your existing offerings - We would encourage Welsh Water to also include a campaign to raise awareness on dual flush buttons. This is also an area you have led on before and continuing engagement in this area is important. Research by ESW has found 20% of people incorrectly identify which is the small flush button in their own homes. 	Please see Chapter 4, Section 4.5.6 for information on our AMP8 Water Efficiency Strategy, which does include Leaky Loo Support.

		<p>- The plan could include recognition of the energy cost impacts currently experienced during the cost of living crisis. There is opportunity for the company to use this as part of communication campaigns about the opportunities saving water brings. As well as water savings the company can highlight associated energy (and carbon emissions) savings.</p>	
211	Waterwise	<p>We are pleased to see that Welsh Water recognises the potential contributions to demand reduction from government policies such as water labelling of products and have included this in the plan. We are asking all companies to include a budget in their final plans to support/promote the roll-out of water labelling in AMP8 helping to explain to their customers why it is important and how they can use the label. The trial of an incentive scheme could also be considered. There are further opportunities to secure additional savings through more ambitious policy-led solutions with regards to new build development and retrofit and we value Welsh Water’s ongoing work with Waterwise to advocate for more supportive policies.</p>	<p>Please see Chapter 4, Section 4.5.6 for information on our AMP8 Water Efficiency Strategy.</p>
212	Waterwise	<p>There is limited evidence of work to improve new developments to ensure water efficiency. Areas we have seen others reference that could be taken forward by Welsh Water include:</p> <ul style="list-style-type: none"> - Trialling and roll-out of flow controllers in new build properties. Numerous trials across the UK 	<p>Please see Chapter 4, Section 4.5.6 for information on our AMP8 Water Efficiency Strategy.</p>

		<p>have shown that they can work well and save circa 30-65 litres per property. Welsh Water could also work with local authorities and housing associations to install them in social housing.</p> <p>- Refreshing developer incentives to help minimise the water demand footprint of new development and Thames Water have a good existing example of this (page 9).</p>	
98	Waterwise	<p>The approach of progressive metering seems positive - however the plan reads as though the suggestion is they will be unbilled until a change of occupier? This may be misunderstood, but we would strongly advocate that customers should be encouraged to start to use the metered bills immediately - which could include the usual option to revert back if bills are too high. We would also caution the use of the term smart meters when referring to AMR meters within your plans. While they are capable of daily consumption data this still comes months after the water has been used.</p>	<p>Our progressive metering policy includes metering unmeasured customers on a change in occupier, so they will be measured customer once a new occupier is in the property. There would be option for a meter reversal. We note your concerns around the use of the term 'smart' when referring to AMR meters but our overall strategy is to deliver a fully 'smart' metering infrastructure and so it is within this wider context that we are using the term 'smart'.</p>
99	Waterwise	<p>We are pleased to read that you will continue to review and potentially move to AMI meters earlier than currently planned.</p>	<p>Thank you for your comment.</p>
100	Waterwise	<p>We fully support the plan of community engagement while carrying out metering programmes as this is a key opportunity to engage on the ground with those impacted. Welsh Water can benefit from connecting with</p>	<p>Thank you for your comment.</p>

		colleagues in the south east of the UK who have completed compulsory metering programmes to learn from their experiences.	
202	Waterwise	At Waterwise, we're committed to driving equity and preventing discrimination at work and in the work we do. A great deal of our impact is delivered through challenging other through consultations such as this to ensure equity, diversity and inclusion has been considered in all policy and planning decisions. We encourage as you develop the final plan to consider the impacts on social wellbeing and how you will understand impacts of decisions, including in the long-term following trade-offs, on the diverse members of the Welsh Water customer base.	Thank you for your comment and we will ensure that our Plan delivers benefit for all our customers.

6.3. Responses from consumer bodies

Reference	Consultee	Feedback	DCWW reply/action
73	Consumer Council for Water	The executive summary is still technical to a level that does not make it engaging for the layperson. We have been informed that there will be a customer summary document drafted but have not seen a copy of this.	To accompany the publication of our Final WRMP24 we will aim to produce a more customer facing summary document that will hopefully make our Plan more accessible.
77	Consumer Council for Water	There are charts and graphs but very limited use of infographics or simplified explanations of technical concepts. As above more context would be useful to aid engagement and understanding.	Thank you for your comments, our planned customer facing summary for the Final Plan will look to include infographics to help with its communication to our customers.
225	Consumer Council for Water	Generally the Plan is thorough and detailed and follows the Welsh Government's guiding principles and Ofwat's strategic priorities for PR24.	Thank you for your comment.
230	Consumer Council for Water	[The draft WRMP24 document has] clear and demonstrable consistency with, the 'Water Resources West' Regional Plan	Thank you for your comment.
34	Consumer Council for Water	Climate change is highlighted as one of the priority areas of the plan, which is reassuring, given the company's lack of a separate, published climate change adaptation plan.	Climate change is one of the key drivers of uncertainty in our plan and so we have taken a robust approach through assessment of a range of possible climate futures which will help ensure future drought resilience.
130	Consumer Council for Water	It is concerning that there seems to be a lack of focus on business/Non-household customers particularly in relation to demand management.. We would like to see greater detail on how DCWW plans to engage business customers and manage and reduce business side demand and help businesses become more resilient to and prepared for drought.	Please see Chapter 4, Section 4.5.7, where we have added information on our plans from AMP8 to increase our support and commitment to Non-household customers in improving water efficiency to reduce usage and minimise any wastage.

83	Consumer Council for Water	Equally, leakage reduction is detailed in respect of short, medium and long term but more focus on anything innovative being introduced to assist in this area would be positive.	Within Chapter 4, Section 4.6.1 we have added additional text as to how innovation will form part of our Leakage Strategy.
84	Consumer Council for Water	It is clear that reducing leakage is a priority for customers and, alongside customer education, it is reassuring to see mention of the 'social contract' between DCWW and their customers and the outline of the 'background leakage' work being carried out through the Innovation fund.	Thank you for your comment.
86	Consumer Council for Water	The recent adaptation of DCWW's policy regarding customer supply pipe leakage and its specifics could be better explained and covered as part of the plan, as well as how this fits in with the overall demand management strategy.	Thank you for your comment. Please see Chapter 4 Section 4.6.1 for information on our approach to working with customers to reduce their leakage.
105	Consumer Council for Water	The company's metering policy is outlined and explained, specifically that from 2025 they propose to move to a strategy of installing smart meters with Automated Meter Reading (AMR) on unmeasured properties by geographical area. Given CCW's previous experience of working with companies that have introduced progressive/compulsory metering programmes, we would welcome consultation with Dwr Cymru regarding their strategy	Thank you for your comment and we will seek to engage with CCWater as we develop and deliver our long term metering programme.
143	Consumer Council for Water	The plan presents the company's ambition to achieve a per capita consumption target of 110 l p/p/d but it would be reassuring to see more detail regarding the strategy for achieving this.	Our draft Plan contained a commitment to reduce our average per capita consumption to 110 l/h/d by 2050, however, we acknowledge that we did not set out the full details all the water efficiency activity that would be required to achieve this target, notably the company-led activity from 2040. Our

			revised Plan sets out fuller detail of how we will achieve this ambitious target through a combination of smart metering, government implementation of water labelling and the company-led water efficiency activity. Please see Section 4.5.5 for full details of our household water efficiency strategy.
68	Consumer Council for Water	It is notable that the plan outlines the company's long-term ambition to achieve 15% reduction in leakage by 2024-25 and 110 l/h/d per person per day consumption by 2050. We would wish to see a glide path showing what level and when reductions in demand are expected to be delivered.	Within Section 6.2 we have added a table and updated the accompanying figure to provide a clearer indication, at a company level, of the breakdown of assumed savings from our demand management strategy in terms of both MI/d reductions and the timings of these reductions taking effect.
203	Consumer Council for Water	There is no easily accessible information regarding the likely bill impact of the Plan. Any price increase will be in addition to the bills impacts from other regulatory requirements and investment needs, and should be made clear. A single water affordability scheme is needed to make sure those most in need are protected from higher bills due to increasing environmental investment pressures.	Section 6.7.1 in Chapter 6 provides an estimate of the potential impacts to customer's bill from delivery of the enhancement expenditure identified in our preferred plan, across the 25 year planning period to 2050.

6.4. Feedback from local authorities and national park authorities

Reference	Consultee	Feedback	DCWW reply/action
38	Flintshire County Council	The Council is generally supportive of the draft 2024 WRMP in terms of the approach taken and specific focus on drought resilience. It has noted that there are no specific supply issues forecast for the Alwen Dee Water Management Zone within this plan, which covers the Council's administrative area.	Noted, thank you for your feedback and we look forward to working with you on our future plans.
39	Flintshire County Council	The Council supports a commitment to more regular direct liaison between the Council and DCWW representatives on common issues such as demand planning and phosphates mitigation	Noted, thank you for your feedback and we will discuss internally as to the best forum for us to undertake liaison with yourselves.
56	Flintshire County Council	The Council requests clarification that the growth within the now adopted Flintshire Local Development Plan (LDP) has been factored into the demand forecasting for the Alwen Dee water management zone;	The population and property data used within our demand forecast has been derived from Local Planning Authority projections as published by Welsh Government. We employed Edge Analytics consultants to undertake this work and they directly engaged with all local authorities across our water supply area to obtain both site level development data from the local development plans and local population projections. Further detail is provided in Section 4.3.5 of the revised Plan.
69	Flintshire County Council	The Council fully supports the wider resilience measures relating to improvement of leakage detection and greater emphasis on customer awareness of the need to use water more efficiently, that are important objectives of the plan	We thank you for your support on this and have included greater detail within Section 4.5 of our revised Plan around how we will deliver these objectives.
204	Flintshire County Council	The Council considers that a reduction in waste water going to waste water treatment works has the	Thank you for your comment. Please see our Drainage and Wastewater Management Plan for

		potential to assist with the significant issue of improving the treatment of phosphates in waste water, and reducing levels discharged into SAC protected rivers;	more detail about schemes related to waste water treatment works.
205	Flintshire County Council	The Council would like to see clearer linkages made by Welsh Water from the draft WRMP, to the need to improve the phosphate removal technology at waste water treatment works as part of their future capital programme	Thank you for your comment. Please see our Drainage and Wastewater Management Plan which provides details of the schemes identified at our waste water treatment works.
147	Pembrokeshire Coast National Park Authority	We appreciated the opportunity to learn more about the draft and ask questions informally at a workshop event hosted by Dŵr Cymru Welsh Water on 24th January 2023.	Thank you for your comment and for your contribution at our stakeholder event, which was much appreciated.
37	Pembrokeshire Coast National Park Authority	Thank you again for the opportunity to comment.	Noted, thank you for your feedback and we look forward to working with you on our future plans.
148	Pembrokeshire Coast National Park Authority	The measures taken to improve the supply demand balance in the Pembrokeshire water resource zone are welcomed. We also welcome the measures taken to overcome the supply restriction to South Pembrokeshire, evident during times of high usage resulting from visitor numbers	By early 2025 we will have delivered all our identified supply side options in the Pembrokeshire zone which will greatly increase its resilience to both periods of prolonged drought and high temperatures that lead to significant peaks in demand.
149	Pembrokeshire Coast National Park Authority	We welcome the iterative approach to planning, where the draft proposals build on WRMP19 and address new drivers.	Thank you for your comment, we seek to ensure continuous improvement with each WRMP building and improving on the previous plan.
3	Pembrokeshire Coast National Park Authority	Learning from the 2022 drought has been incorporated into the draft Plan. A workshop presentation on customer engagement showed that there was strong customer support locally for the temporary ban on water use in Pembrokeshire. This support accords with our experience, and we wish to	We thank you for your positive feedback on this issue and are grateful for the positive response that we saw from our customers in the affected area.

		commend Dŵr Cymru Welsh Water for its communications at the time.	
154	Pembrokeshire Coast National Park Authority	We note the stated aims to achieve 1:200 drought resilience by 2030 and 1:500 by 2040, and the importance of the latter to any border zone trading.	NRW have set strict rules around any cross border trading in that any zone of supply in Wales must be have at least equal, if not greater, level of drought resilience than the supply area in England it is providing water to. We agree with this approach and would not propose any trading of water with neighbouring companies unless this condition was met.

6.5. Responses from water companies and regional water resources groups

Reference	Consultee	Feedback	DCWW reply/action
109	Water Resources West	We expect that, following the consultation on both the draft regional plan and the draft WRMPs, Welsh Water will continue to adapt its plan in accordance with WRW methodologies so that we are able to produce a consistent and coherent final regional plan that is reflected into the Welsh Water WRMP.	Thank you for your comment and we confirm our intention to continue working closely with Water Resources West to ensure consistency and alignment between our company plan and the regional plan.
199	Water Resources West	<p>We therefore request that Welsh Water inform us if transfers between Welsh Water and other water companies become available in the future. This means that, should transfers to/from Welsh Water become available, we would need to work together in reconciliation to develop evidence that any transfers involving Welsh Water can be included in the WRMPs of our members and the members of other regions as part of best value plans that their boards can assure.</p> <p>The regulatory timetable for producing the statement of response is also relatively tight, so should Welsh Water make the decision to promote an external transfer within their final plan we would ask that you:</p> <ul style="list-style-type: none"> - provide us with clear and timely information - take appropriate evidence based decisions - include a clear articulation of timing, volumes and utilisation of transfers in your statement of response <p>We commit to facilitating the same in return from our other members and the other regions</p>	We thank you for your comment and can confirm that we are not proposing any external water transfers in our Final Plan.

6.6. Responses from trade associations

Reference	Consultee	Feedback	DCWW reply/action
131	NFU	<p>NFU Cymru supports the devolution of matters relating to water. We believe Welsh Government must understand the full economic value of Wales's water as a key strategic resource and ensure this value is returned, in full, to the people of Wales. Water is a vital element across all agricultural sectors and farmers rely on a combination of rainfall, mains water and abstracted water to meet their needs. As population growth increases across the UK, greater pressures on a range of resources are expected including demand for water. A changing climate also means that additional water may be required in source areas for food production. Welsh farming must be able to access its fair share of water resources now and in the future to enable sustainable growth of the sector.</p>	<p>Thank you for your comment. We are committed to working with a wide range of sectors to help ensure the sustainable use of water resources across our supply area. The NFU are also represented on the Water Resources West Regional Group which facilitates cross sector working.</p>

6.7. Responses from businesses

Reference	Consultee	Feedback	DCWW reply/action
103	Arqiva	To achieve the necessary reductions in water consumption and ensure consumers can fully realise the benefits, water companies and households must be empowered with the real-time data smart meters provide.	Noted, thank you for your comment.
104	Arqiva	Full document on benefit of AMI available separately from Water Resources	Noted, thank you for your comment.

6.8. Responses from other authorities

Reference	Consultee	Feedback	DCWW reply/action
74	Environmental Public Health (NHS)	The Plan refers to water resources management with specific reference to drought resilience. We agree and encourage that the plan should look beyond drought as a standalone issue and considers other environmental hazards and threats simultaneously i.e. flooding	A WRMP's primary purpose is to ensure secure water supplies during the driest of years. However, we acknowledge that some options we may take forward can have beneficial effects for other hazards and so this is accounted for within our options appraisal. Where additional benefits for higher costs can be justified then through our decision making process, these schemes would be selected as part of our 'Best Value' plan.
201	Environmental Public Health (NHS)	It is important to understand that within the water zones mentioned, there will be vulnerable individuals, communities and populations. It is important that risks to these customers be appropriately and adequately assessed as part of the wider objectives of the plan. Any identified vulnerable customers should be appropriately supported.	Our Priority Services Register contains details of our most vulnerable customers, and we work to ensure this is maintained and updated with the latest available information to allow us to provide our customers with the best support available.

