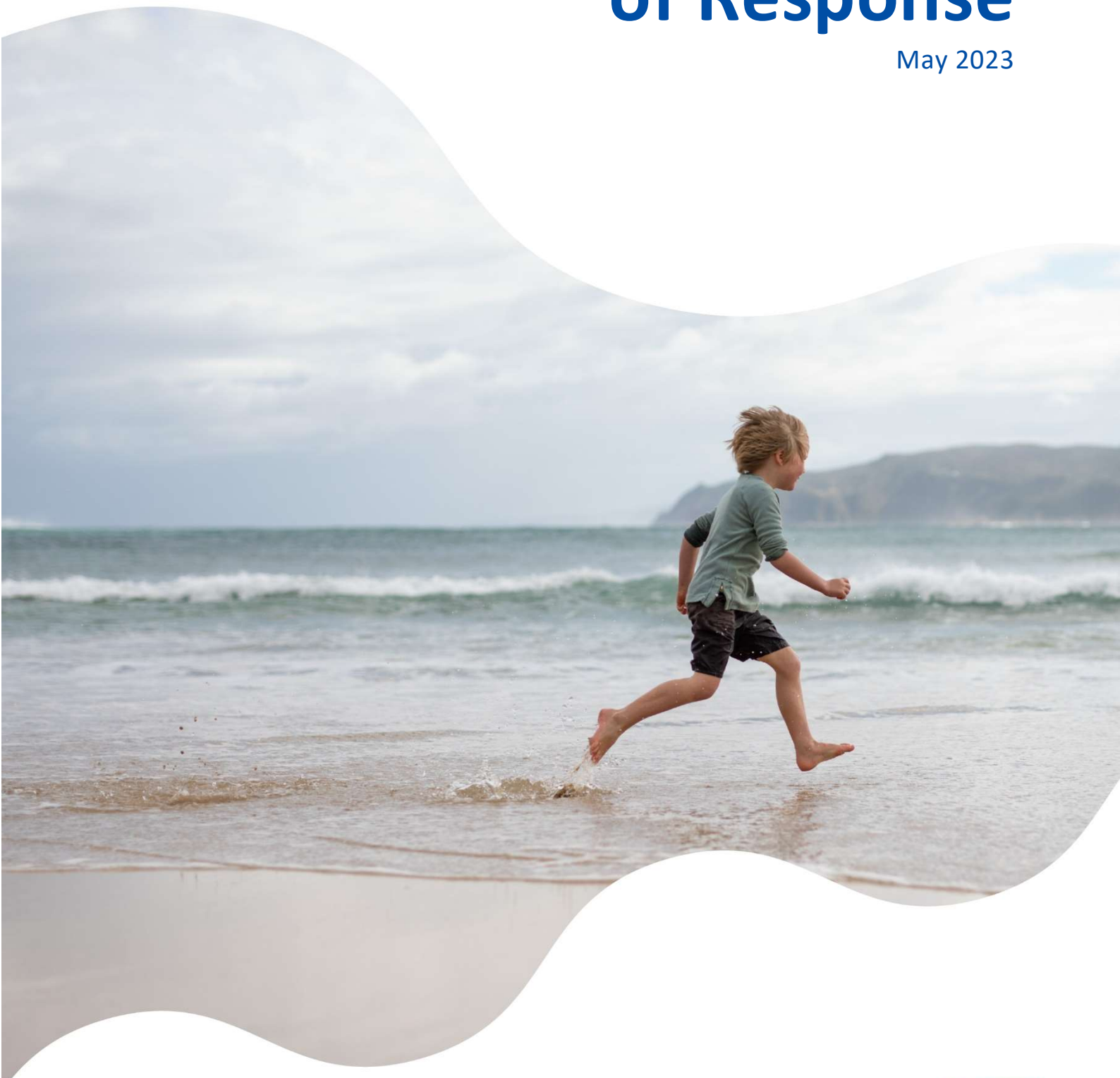


Drainage and Wastewater Management Plan

Our Statement of Response

May 2023



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About this document

This document shares the feedback that we received from the formal consultation on our Drainage and Wastewater Management Plan (DWMP), the impact of what we heard and how our final plan will reflect the views of our customers, stakeholders, and regulators.

Our DWMP outlines how we plan to approach and manage sewerage and wastewater over the next 25 years. Between June and September 2022, we asked customers, stakeholders and regulators to review our draft plan and share their feedback.

We welcome the opportunity this Statement of Response brings to share, with our regulators, what we heard and didn't hear - from a broad range of consultees. We're sharing our reflections on the key themes and what this has meant for the development and delivery of our final DWMP in May 2023.

People shared their views through a range of routes including via email, attending customer focus groups and our Stakeholder Forum, and completing our online survey. We've reviewed all the comments that we received and grouped these into common themes.

This document shares the comments that we received for each theme, and as recommended by Defra, we've shared views by each consultee group which enables us to share our responses more precisely.

This document and our responses explain the progress that we have made since our draft DWMP and how we intend to use the feedback provided by our regulators, stakeholders and customers to shape our final DWMP submission.

Executive summary

Our customers, stakeholders and regulators want our DWMP to deliver significant improvements whilst balancing affordability and the pace of delivery alongside what they value most.

Our DWMP is a plan for the environment, and provides the opportunity for a further step change in investment which ensures that our assets remain strong and resilient in light of the pressures we face in the South West over the next 25 years. It will allow us to continue to modernise and transform our wastewater networks to provide services to customers, protecting and enhancing the environment now and for future generations, mitigating and addressing the impacts of pressures such as climate change and population growth.

We produced a draft DWMP in 2022 to share an initial view of our plans, recognising that the views of our customers, stakeholders and regulators is critical to shaping our final plans. We need to produce a balanced investment plan that meets the needs of our region and so we formally consulted on our draft DWMP between June and September 2022 to help us understand how to prioritise our investment in our drainage and wastewater network.

We asked customers what their priorities were for our investment in our drainage and wastewater network - and were especially keen to hear their views on how we strike the right balance between nature-based solutions, partnership working, prioritisation and the pace of change. We also wanted to ask customers how they felt we could better protect our networks from external factors such as climate change, population growth and plastic pollution.

We heard from over 170 customers, stakeholders, and regulators through a range of routes including online surveys and workshops, in person forums and a dedicated email inbox. Our customers and stakeholders are at the heart of our plans so alongside formal consultations we listen to our customers and stakeholders through a range of other engagement routes - and these conversations support much of what we've heard in this DWMP consultation.

We were pleased with the good engagement and high levels of trust in our plan. Stakeholder groups, as anticipated, were well informed about many of the future challenges of the DWMP and we have heard offers of support to work in partnership to both deliver and support community engagement initiatives.

There were some significant parts of our plan that we anticipated more feedback about. We were challenged on affordability, but received limited feedback on investment scopes and costs/bill impact certainty, and the deliverability of a programme of this scale. Transitioning to nature-based approaches was supported but the complexity, delivery risks and pace of this change are less well understood.

Reducing pollution from storm overflows was raised as a priority throughout the consultation. Our reliance on storm overflows is no longer acceptable and we need to change how we do things. Recognising that this will take time, bathing beaches are the area that customers say they want us to prioritise.



Top: Sidmouth Beach
Centre: Reed Bed
Bottom: Polperro Sewer Jetting

We will prioritise our investment in our bathing waters with an ambition to ensure everyone can enjoy their local beach all year round. Our WaterFit Live programme is already beginning to share bathing water quality and storm overflow discharges (start/stop data) at beaches, and our DWMP plans will continue to improve this programme by extending this information to inland locations by the end of the year.

The level of investment that our final DWMP will deliver is a step change from previous years. We've heard from the consultation the importance of developing adaptive plans and sharing the assumptions we've used to develop our solutions. We provide more clarity on our chosen scenario, assumptions and costs in our final DWMP.

We heard about the importance of showing environmental leadership in the region, working with our partners in the region to develop nature and catchment-based solutions wherever possible. We also heard the need to balance more innovative solutions with more traditional engineered options for urgent and high impact solutions. Our customers and stakeholders recognize there is a balance to be struck here and we're confident that our initial nature and catchment-based solutions will develop our understanding of how to maximise the use of these approaches in future investment periods.

Our consultees have broadly similar views about what we should invest in, but we have heard differences in views about the pace that we deliver at. Whilst customers are willing to pay more for improvements than ever before, we heard that ensuring affordable bills is very important. Customers are supportive of changes to how we charge for services to ensure affordable bills.

Our consultation has helped us to understand how important it is that our plan is accessible to our customers and that we share information on what's happening in their local area in a format that's clear. We've also heard how important it is to share the likely bill impacts of our investment programme. We've listened to this feedback and part of our final DWMP includes a customer summary and we share the likely bill impacts, subject to the Business Plan that we'll be submitting in October 2023.

This formal consultation has provided us with an opportunity to hear what's important to our consultees and how they wanted us to refine and prioritise our final DWMP, so that we can be sure we have a plan that delivers for everyone and that future generations can be proud of. We've provided an overview of consultation themes and then shared the more detailed feedback by consultee groups in the second part of this document. You'll be able to find more detail on how we're addressing the consultation responses in our final DWMP documents and we've signposted in the tables how to find this.

Introduction

Our Statement of Response is an opportunity to share the views of our customers, regulators and stakeholders and explain how this feedback informs our final DWMP.

DWMPs are new for the sector and the role of the DWMPs is to manage flooding and pollution risk, whilst taking a more holistic view of environmental performance. Our Drainage and Wastewater Management Plan will cover the period 2025 to 2050.

Our Plan

DWMPs represent a step change by government and the UK water industry to do more to minimise the risk of flooding and reduce environmental harm to rivers and seas.

Our DWMP is a plan for the environment in the South West, and provides the opportunity for a further step change in investment which ensures that our assets remain strong and resilient in light of the pressures we face in the South West. It will allow us to continue to modernise and transform our wastewater networks to provide services to customers, protecting and enhancing the environment now and for future generations, mitigating and addressing the impacts of pressures such as climate change and population growth.

This means our wastewater system will mitigate and address the threats from sea level rise, coastal erosion, flash flooding, and increasing amounts of wastewater, rainwater and plastics entering our system. And it will do this whilst maintaining high levels of service to customers and protecting our environment.

We recognize that we cannot deliver our customers and stakeholders vision on our own – others have a vital role to play, and success will require new ways of thinking, unheralded levels of collaboration, and above all, changes across all levels of societal behaviour. This is at the core of our DWMP plan.

Many organisations work together to manage the risk of flooding across the region so it is important that the DWMP clearly sets out what South West Water is prioritising so that we can work effectively with our partners. This helps us to manage any conflicts or situations where responsibilities may be unclear, and identify partnership opportunities where we can work together to deliver better outcomes together.

Water sector feedback

In June 2022 we published our draft DWMP and began a 12-week consultation to gain feedback on our plan from customers, stakeholders and regulators. Once the consultation period closed in September 2022, we analysed the feedback we received on our draft plan and this is helping us to create our final plan.

This document sets out the feedback that we have received and how we are using it to inform our final DWMP that will be publishing in May 2023.

We want to thank all of the organisations and customers who spent time sharing their views with us to enable us to produce the best value plan for our region.

We were especially keen to hear views on...

How do we get the right balance of nature-based solutions and partnership working?

Have we got the right balance between prioritisation and pace of change?

How can we better protect our networks from external factors such as 'unflushables'?

Background – Our Region

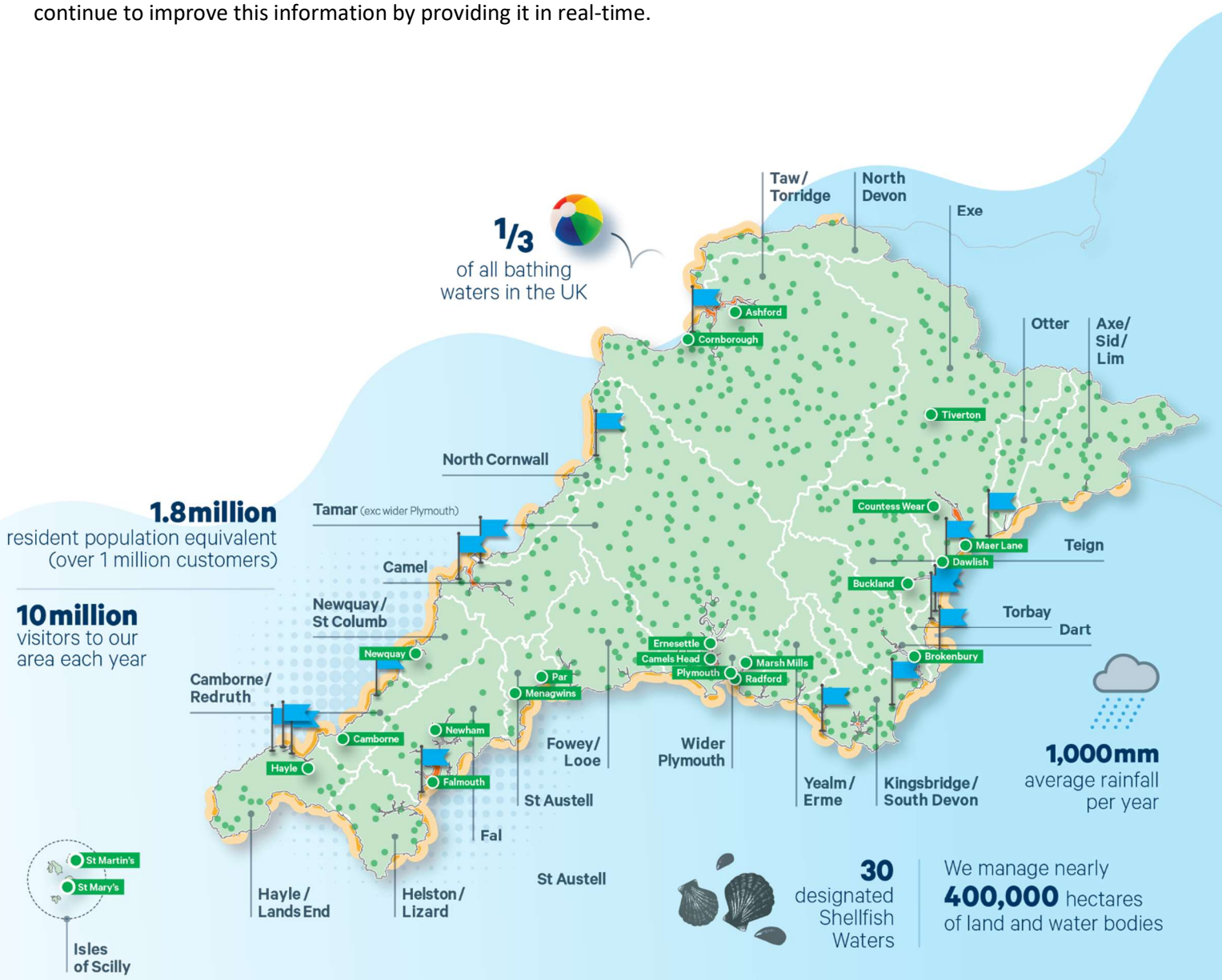
Our wastewater operations serve 1.8 million people across the South West. The region has a unique topography and environment, miles of coastline and many areas of outstanding natural beauty.

Our population of 1.8 million is set across a range of communities, from small remote coastal villages through to urban centres, such as Exeter and Plymouth. This population swells in the summer to accommodate over 10 million visitors, who are drawn to the beautiful coasts, rivers, reservoirs, lakes and ponds right across the region.

Continuing to improve river and sea quality across the region has taken centre stage, as water-based recreation, such as wild-swimming, and paddleboarding have become more popular, and the pandemic has strengthened the bond we all have with green and blue spaces, now and for generations to come.

As we invest for the future, we recognise that our region is set apart from the rest of the UK. Maintaining the beauty of this unique coastal environment whilst meeting the 21st century needs of our customers requires innovative solutions and ways of working. We have already built strong relationships with farmers, land managers and environmental organisations to protect our water quality in the South West. We recognise that we are a custodian of the environment, and we'll need to work with others to resolve many of the challenges we face.

Our DWMP consultation has helped us to understand the value that our customers and stakeholders place on our coastline. We have listened, and we will prioritise our investment in our bathing waters with an ambition to deliver improvements at each beach in the region by 2030. Our WaterFit Live programme is already beginning to share water quality data at our beaches and our DWMP plans will continue to improve this information by providing it in real-time.



Our Consultation

Hearing from over 170 regulators, customers and stakeholders across more than 35 organisations through online and in-person workshops, surveys, focus groups and written responses has helped to shape our final DWMP.

Every day we engage with our customers through the many interactions we have; day to day contacts and complaints, bills, newsletters, through tweets and Facebook links, voice of the customer surveys, tracking satisfaction surveys, research events and community events targeting affordability and vulnerability concerns.

We look to engage all customers – as we look to bust myths and to ensure all customers can hear about our plans and activities and get in touch to have a say and a voice in our plans. The DWMP consultation was a formal process where we heard specifically about our drainage and wastewater investment. Much of what we heard is also reflected in the other interactions we have with customers.

What we consulted on

In the focus groups we shared details of our objectives and the step change in investment that we're planning by 2050. As per the industry developed DWMP technical framework, all water companies have three common objectives for DWMP, but we consulted on adding our own objectives to raise standards and tackle the impacts of climate change. These are outlined in the diagram.

We asked consultees what their priorities were for our investment in our drainage and wastewater network and were especially keen to hear their views on how we strike the right balance between nature-based solutions and partnership working and whether we've got the right balance between prioritisation and the pace of change. We also wanted to ask how people felt we could better protect our networks from external factors such as climate change, population growth, and the increased use of plastics and unflushable products.

How we consulted

We've gathered the views that we've heard into themes to see areas where there is significant agreement and areas where we need to carefully balance a range of views. We're sharing these feedback themes and we'll identify if the feedback was provided by one of our regulators or one of our stakeholders or customers.



Our focus on strong partnerships continues to develop and, in the lead up to PR24 we will continue to undertake an extensive programme of 1-2-1s with local and national stakeholders, including Local Authorities, environmental NGOs, Associations of Town and Parish Councils, Local Nature Partnerships, Local Enterprise Partnerships and Tourism bodies across the South West (including Devon, Cornwall, Isles of Scilly, Bristol and Bournemouth).

In 2022 we established our **Stakeholder Forum**. In July 2022, over 75 partners joined us face to face at our first forum to explore the issues and opportunities for a range of planning frameworks including DWMP. This was followed with three regional catchment online **workshops** and the draft DWMP was also discussed at further online forums and 1 to 1 meetings with stakeholders. The feedback that we're sharing in this document relates to information we gathered through the consultation period and we will continue to listen to our stakeholders and customers as we implement our plans.

We wanted to ensure we heard the views of our customers and so alongside an online survey which we invited customers to complete, we also provided a dedicated email mailbox to take queries, and ran a session with our **Customer Forum** to really understand their views. We also gathered views from customers in focus groups and encouraged discussion and debate, providing customers with the opportunity to understand our draft plans in more detail. Customers welcome seeing information on the challenges we face, our plans to address these, and how they will be impacted as customers.

How it's been received

The DWMP is a new process for shaping the future of our drainage and wastewater network, aiming to deliver a step-change in the scale of investment to achieve a necessary and stretching set of targets. We're pleased that the draft DWMP was broadly well received by regulators, customers, and stakeholders. With such a new process we want to share our reflections on what we expected to hear from consultation and where this differed from what our consultees told us.

We were pleased with the good engagement and high levels of trust in our plan. Stakeholder groups, as anticipated, were well informed about many of the future challenges of the DWMP and we have heard offers of support to work in partnership to both deliver and support community engagement initiatives. We've identified that there is still a lot of work to do to help customers understand the complexity of resolving the challenges of reducing spills.

There were questions about the affordability of our plan and a small number of customers asked how we will fund this investment. We had anticipated more questions about the certainty of our investment scopes and costs and how we will deliver such a significant increase in investment.

96% of our customers and stakeholders who responded said they want us to use nature-based solutions as part or the majority of our approach. Adopting new delivery approaches and techniques, combined with a programme that is much larger than we've delivered before will mean higher levels of uncertainty around both cost and delivery.



South West Water stakeholder engagement event



South West Water stakeholder engagement event

We also have the innovative independent **WaterShare+ Advisory Panel**, that was established to protect the interests of our customers – it provides an independent review of our commitments and delivery of our promises as the voice of the customer. We will continue to work with the WaterShare+ Panel to continue to hear reflections on our wastewater plans and our final DWMP from a customer viewpoint.

More recently, we held a **supplier engagement event** as part of our preparations for delivering DWMP investment. Our suppliers work internationally and have a breadth of expertise in more traditional delivery methods. We are hearing from our suppliers, and we have a good understanding of their capabilities and capacity, but also about the skills gap that currently exists for delivering nature-based solutions and delivering a programme at this scale.

Our Upstream Thinking Partners are ready to support us to deliver these new approaches and our existing partnerships provides us with a great starting place to change our delivery method. We know we'll need to use AMP8 to refine our approaches to nature and catchment-based solutions and transition our supply chain to this new way of working.

We've shared a summary of our consultation process and some of the themes we heard in the image below. You can find a list of the stakeholder groups who we consulted with in Appendix 1.

How we've consulted



Timeline for milestones



What we heard

Customers, stakeholders and regulators have shared their views with us. We've listened and are developing our final DWMP based on this feedback.

We're grateful to the stakeholders, customers, regulators and organisations that took the time to engage with our DWMP consultation and provide us with feedback on our draft plan.

We heard a number of common themes from all of the consultation responses and so we've chosen to group our feedback by these themes to highlight the similarities. This approach will also enable us to share where there are points of difference and ultimately, how we plan to find the right balance in our final DWMP to respond to these.

Feedback from our regulators

We've received specific feedback from Ofwat, the Environment Agency and CCW. The feedback was grouped around these themes –

We received feedback from three of our regulators, Ofwat, the Environment Agency (EA) and the Consumer Council for Water (CCW). Their feedback is grouped into the following themes, we've outlined how we're responding to this feedback in the table below.

- **Adaptive planning and risk management:** Detailing our approach to adaptive planning including how this approach will support risk management.
- **Providing a best value plan:** Clarifying how we have defined a best value plan with specific focus on the role that nature-based solutions will play and where applicable, detail on why these are not being used.
- **Cost, funding and affordability:** Providing more detail of our willingness to pay exercises to determine best value.
- **Storm overflows:** Providing a robust and detailed plan for storm overflows including timeline.
- **Environmental ambition:** Demonstrate leadership given that a proportion of investment will be delivered in AMP9 and beyond. Ensuring nature-based solutions are adopted as a default option.
- **Stakeholder and customer engagement:** Sharing the impact of our stakeholder engagement and demonstrating and how the DWMP connects to other initiatives and investments

Ofwat have also provided feedback to the whole water sector in England and the key challenges they shared are listed below.

- Storm overflow plans require more detail including details of how targets will be achieved. Since our draft plan was published, Defra has published its Storm Overflows Discharge Reduction Plan which includes targets for companies to eliminate harm from storm overflow spills in England. Ofwat has asked that all English water companies address Defra's storm overflow reduction plan targets in their final DWMPs and should clearly set out how they will achieve, or exceed, them along with the costs and associated benefits to the environment and society.

“We note that your plan demonstrates a good appreciation of adaptive planning, and you recognise the importance of early warnings and triggers to manage uncertainty and apply interventions at the most suitable and cost-effective time”

Ofwat Regulatory feedback

- Ofwat are concerned that companies have not yet fully or adequately identified the scale or timing of their investment needs and have therefore not fully consulted on these. DWMPs should provide Ofwat with confidence that the solutions identified by companies are needed and are the best value over the long term.
- Ofwat considers that base activities that maintain and improve asset health and performance are essential to meet, and continue to meet, legal obligations and must form part of a company's long-term strategy and should be factored into the mix of options for addressing future resilience risks. Ofwat say they are concerned that companies have not been able to satisfactorily prioritise green /nature-based and low carbon solutions such as surface water removal or separation, where feasible.
- While some companies have shown good practice in the quality and quantity of stakeholder engagement, this varies across companies, and Ofwat requires all companies to provide sufficient and convincing evidence on the extent the engagement activities have influenced the DWMPs.

We have heard this national feedback and where this is also reflected in our South West specific feedback, we'll provide a response.

We welcome the opportunity to have feedback on our plans and, both nationally and within the South West, we've received positive feedback about our DWMP. We've also heard where regulators want us to go further and at a different pace.

Feedback from our customers and stakeholders

We've heard views from over 50 organisations and 170 people in the formal consultation period.

Who we heard from

We engaged with our customers and stakeholders through a variety of routes to gather their views on our draft DWMP.

Our customer feedback was gathered from emails to our DWMP mailbox, completion of an online survey and attendance at DWMP specific customer focus groups.

Our stakeholder feedback was also collected through the DWMP mailbox and online survey and attendance at the Stakeholder Forum. We met with stakeholders through three workshops, and our July Stakeholder Forum with over 50 organisations taking part in the conversations.

We have grouped customer and stakeholder themes together as there is much commonality between the views expressed. When we refer to stakeholders the detail of groups represented in this data can be found in Appendix 1.

WaterShare+ Panel

We have shared our plans with the WaterShare+ Advisory Panel, who protect the interests of our customers, and ensure that customer views are represented in the development of our PR24 plans.

Balancing affordability, environmental improvements and adopting nature and catchment-based approaches is where we heard the widest range of views

WaterShare+

While commending the nature of our proposals and range of solutions that we have considered, the Panel are mindful of the potential impact that the level of required investment could have on customer bills – in a financial climate which is already challenging. We recognise this challenge and as part of our PR24 plans we are considering how we might change the way in which customers are charged to be more progressive. The Panel is supportive of steps to modernise and update how we charge for water and wastewater services to ensure bills are fair and affordable, and drive the right behaviours.

Considering both the DWMP and our wider investment plans, the Panel have challenged us to ensure that they are deliverable on the ground. The Panel endorse our approach to working with the supply chain to address these concerns.

The Panel have reviewed feedback from our regulators on our draft DWMP and support our statements of response for our final DWMP.

Key themes from our customers and stakeholders

In this Statement of Response, we have grouped the key themes that we heard from customers and provided our responses to those questions.

Balanced investment choices:

Our customers and stakeholders recognise the challenges we face, and see climate change as the greatest threat to the environment. Many customers and stakeholders recognise that the difficulties we face are complex and that we will need to work with others to resolve many of them.

Customers and stakeholders consider it unacceptable for us to do nothing. Meeting legal compliance for environmental standards is the minimum that they would expect. They recognise the need to maintain investment in our networks to ensure compliance levels and to build future resilience.


Customers and stakeholders want our investment choices to be balanced, addressing a range of environmental aspects, with a particular focus on reducing spills from storm overflows and improving bathing water quality.

Customers told us that they wanted us to prioritise nature and catchment-based solutions with less than one in 20 customers and stakeholders wanting us to focus almost exclusively on traditional 'grey' engineering to deliver as much certainty of the outcomes as possible. Where customers are impacted by urgent and high priority challenges however, they want us to resolve these quickly using more traditionally engineered solutions if required.

We heard that they believe a compromise between nature-based and more traditionally engineered solutions is needed rather than increasing the capacity of our existing system.

Costs, funding and affordability:

One area from the consultation that provided a range of views is the speed at which we bring forward our plans and investments. We heard from customers that steady improvements and affordable bill increases is a priority. We have repeatedly heard that we need to protect vulnerable customers from unaffordable bill increases. And if we can do that – such as through social tariffs and progressive charging – customers generally preferred scenario is for us to apply best value options and deliver environmental improvements quickly and efficiently.



“Traditional engineered solutions should be used for high impact/urgent solutions, but nature-based solutions should be prioritised for all others, where feasible.”

Stakeholder at DWMP workshop

We heard from environmental stakeholders on the importance of showing environmental leadership and making rapid progress. Balancing the pace of delivery and affordability to customers is an important theme we will need to carefully consider in our final DWMP.

Half of our consultees told us that public bodies, other NGOs and the Government should support funding of joint outcomes.

The majority of consultees thought that the proposed bill increase of c. £65 per year, as proposed by Defra to address storm overflows, was acceptable to fund the improvements. And our own research programme into willingness to pay has shown that some customers are unable to pay more whilst one third would pay over £200 a year extra to fund the improvements. But what all customers agree on is that everyone should have an affordable bill.

We had limited feedback around confidence in our costings and the preparedness of the supply chain to be able to deliver a programme of this size. We continue to explore this with our WaterShare+ Advisory Panel.

Environmental Performance:

Customers and stakeholders want us to show our environmental leadership. They are broadly aligned with our plans to maintain current regulatory targets, and they recognise the need to maintain investment in our networks to ensure compliance levels and resilience.

Reducing spills from storm overflows is the highest priority of our customers and stakeholders. Reducing spills that impact on the public health in bathing waters is a key priority for stakeholders and customers, followed by the impact on rivers. We heard from our consultees that a 'no impact' target was unrealistic in their opinion.

Bathing waters are a key priority and we heard from 67% of our consultees that understanding the water quality in near real-time, is a priority. Consultees want to access near-real time information on bathing and river water quality and to see how we are reducing the volume of spills alongside the number of overflows.

Our recently launched WaterFit Live provides information on water quality and storm overflows (starts/stops) at beaches for customers and visitors. Later this year, we will extend to inland river locations.

Stakeholder and customer engagement

More generally our customers have requested that alongside our investment programmes, that we help them to better understand the work that we're carrying out and its impacts.

Our customers want a plan that helps them understand the specific work we will carry out in their part of the South West with clarity on the impact of the plan on future bills.

Our outputs should be easy to read, contain information that's relevant to our customers and provide signposts to find more information if needed.



"An environmental leader is kind of paving the way, starting to make change and affecting the environment in a positive way."

SWW, SEG C2DE, Aged 18-30

Balancing our investment choices



Customers believe a compromise between nature-based and engineering is 'the best option' for the DWMP, rather than increasing the capacity of the existing system



They instinctively like the idea of working with nature to reduce or slow how quickly water enters the drain.



Customers have mixed views on whether they prefer engineered solutions with the associated disruption from retrospectively making the changes, or the lower certainty of nature-based solutions.



Customers consider all challenges to be a priority, ranking climate change as the greatest challenge



Customers would like the DWMP to be balanced, addressing both storm overflow spills and flooding



Customers support action on these overflows and state that it is the highest priority for investment. They also want the bathing water targets to apply all year round.



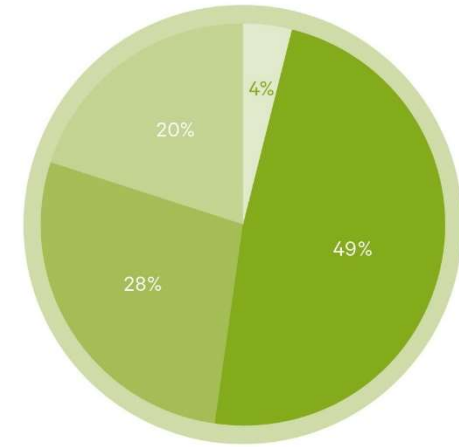
Preferred approach for the delivering change

Use traditional engineered solutions to deliver as much certainty of outcome as possible

NBS should be the default solution and traditional engineered options should only be the last resort when NBS have not delivered the desired outcome/improvement

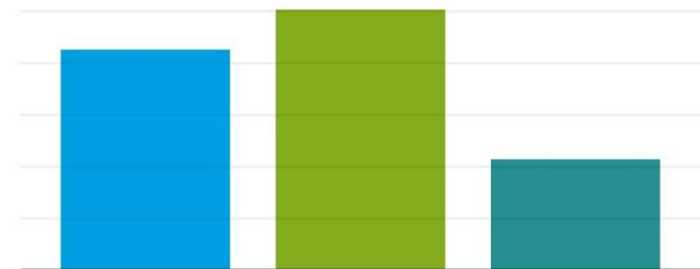
NBS should be assumed to be the default solution and only excluded where options are not feasible/proven

Traditional engineered solutions should be used for high impact/urgent solutions, but NBS should be prioritised for all others, where feasible



Average ranking of storm overflow outcomes

Storm overflow outcomes ranked



- Type 1 Removing the detrimental impact on the river environment from storm overflows
- Type 2 Removing the impact on public health in bathing waters from storm overflows
- Type 3 Ensuring storm overflows operate only in unusually heavy rainfall events

Costs, funding and affordability

Bill impacts are a key consideration.



Over 90%

agreed or strongly agreed that a step change in the level of investment necessary to protect the environment.



69%

felt that increasing bills by around £65 by 2050 is acceptable in order to reduce storm overflows.

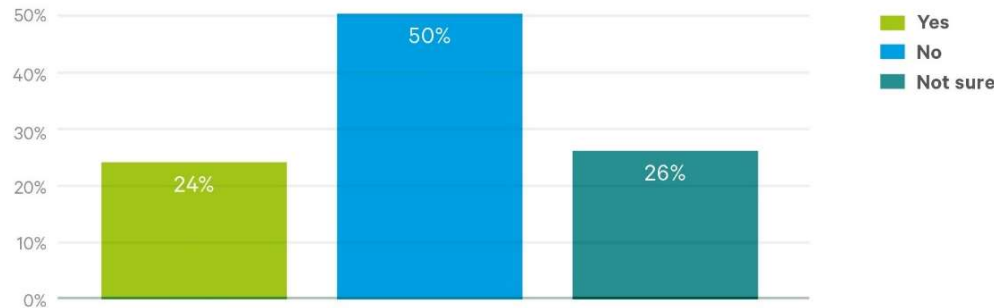


50%

felt that water companies and bill payers should not be responsible for funding all of the necessary improvements.

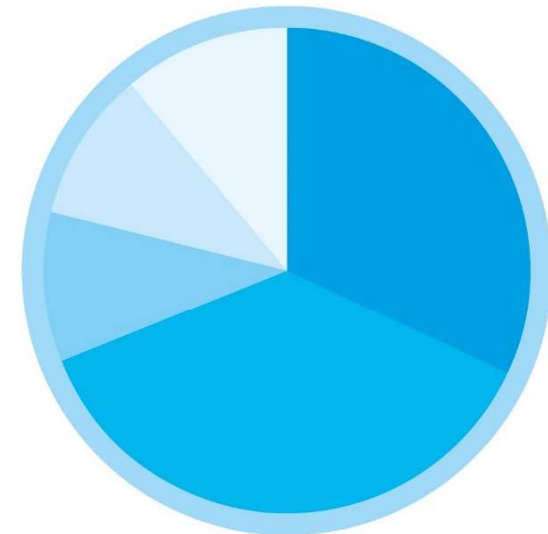


Should Water companies and bill payers be responsible for funding all of the necessary improvements required to meet their targets for storm overflows?

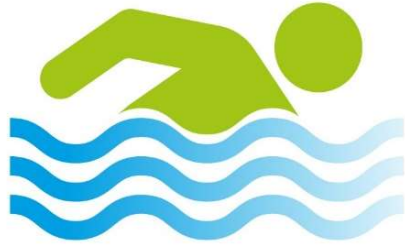


Modelling work by Defra suggests that the investment needed to reduce storm overflows to their target would increase bills nationally by c£65 by 2050.

Do you think this is acceptable?



■ Strongly Agree
 ■ Agree
 ■ Neutral
■ Disagree
 ■ Strongly disagree

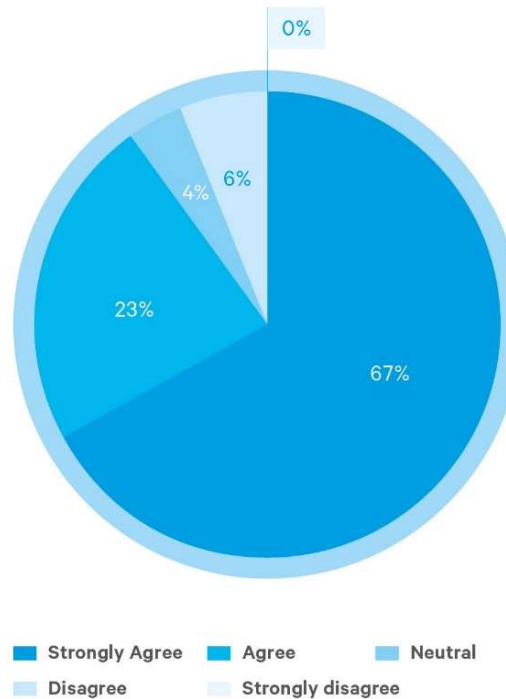


Customers feel that **bathing waters are a key priority** in the South West. This is linked to the high use of bathing waters by customers and the importance of tourism to the local economy.

Customers support investment to remove the **impact on rivers**; however, in both sets of research, customers also expressed concerns about whether **no/zero impact targets** are realistic



Support of investment to provide near real-time monitoring of water quality at bathing water beaches



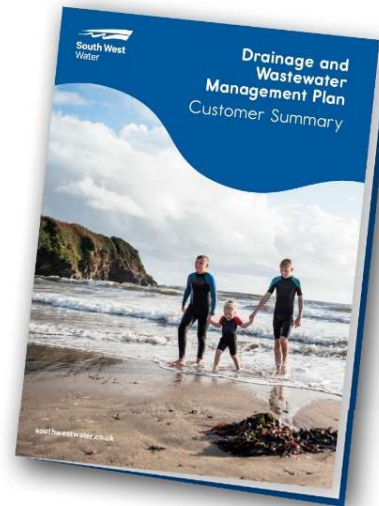
"I found it to be quite balanced in terms of what SWW has achieved and what it still needs to achieve. It was honest. I didn't realise that agriculture played such a big part."
Female, 45-59

"I thought it didn't actually tell me much. What I wanted to see is an actual plan to how you intend to improve sewage systems so raw sewage doesn't end up on the beach."
Female, 60+

Customer and Stakeholder Engagement



Customers support the DWMP's more integrated approach to planning.



“Very customer friendly. Enough pictures and graphs to make it easy to absorb, and I liked the font too. I liked the font and the graphs.”

Female, 30-44

“South West Water is great at partnership working to get the most out of everyone's abilities”

Stakeholder

“The word “investment” appeared 37 times in the report with no mention of where this investment is going to come from.”

Male, 60+

“I would like to see more information on the targets in different areas rather than just comments on the big hitters - Plymouth, Exeter. I live in the South Hams and would like to know more about what the plans are in my area.”

Female, 30-49

What happens next

Our DWMP delivers a step-change in levels of investment in our wastewater network. Consultation has shaped the way we will approach delivering our final investment plans.

We have welcomed the opportunity to speak with our stakeholders, customers and regulators to better understand their priorities for our region as we develop our programme of investment. Our DWMP is not a static plan and we will continue to use our routes of engagement to help us refine the plan and consider opportunities for co-design and co-delivery of solutions. The DWMP forms part of our wider PR24 Business Plan which will be submitted in October 2023.

A clear, accessible and locally relevant plan

Our consultation has helped us to understand how important it is that our plan is accessible to our customers and that we share information on what's happening in their local area in a format that's clear. We've also heard how important it is to share the likely bill impacts of our investment programme.

We've listened to this feedback and have produced a short summary report of our final DWMP which provides the key messages from the plan and signposts where customers can find out more information.

Our DWMP is built around 22 catchments and our final DWMP will share our investment plans at this level of detail. Where we're able to, we'll also share specific case studies that help customers understand what's happening in their area.

Maintaining affordable bills

We heard from customers that fair and affordable bills for all are essential. This is something that we have heard from customers throughout the cost-of-living crisis, so we need to manage overall bill levels, maintaining a robust affordability toolkit, and ensuring a diverse and innovative approach to tariffs.

We understand the importance customers place on having bills that continue to be affordable whilst meeting the needs of our environment. We need to be agile in how we ensure fair charging. This means thinking about bills in a different way.

We would like to see the introduction of a national single social tariff – we know that this is supported by customers. We are also promoting **progressive charging** – through engagement with regulators backed by cutting edge analytics and future tariff trials. Our customers have already told us how important it is to ensure that those that benefit from investment pay their fair share. We will continue to engage customers and tourists – as we explore this in more detail.

Our final DWMP will show the likely bill impacts of our investment, subject to the Business Plan that we'll be submitting in October 2023.

Balancing our investment choices

The level of investment that our final DWMP will deliver is a step change from previous years. We've heard from the consultation the importance of developing adaptive plans and sharing the assumptions we've used to develop our solutions. We'll provide even more clarity on our chosen plan, assumptions and costs in our final DWMP.

We understand the criticality of achieving the significant reduction in spills and reducing the impact on our customers and the environment and in some areas this means that we need to deliver solutions that provide immediate benefit. We'll produce a balanced plan that considers how to maximise the benefits whilst using nature and catchment-based solutions wherever possible.

Environmental Ambition – Green First

We've heard from all of the groups that responded to the consultation that championing nature and catchment-based solutions is important. We've also heard the widest range of views about how we should use these solutions. We understand the potential impact on our operational carbon footprint from the choices that we make in our DWMP and the strength of views around using more distributed and natural solutions. In response to the feedback and in order to mark a change in approach to decision making, we are publishing our 'Green First' framework as part of our DWMP.

We've heard the priority that our customers and stakeholders placed on prioritising bathing water quality investment and understanding our impact on water quality and we will ensure this is a key focus in our final DWMP. We are already on an improvement journey and the launch of WaterFit Live will provide real-time updates to customers on bathing water quality for a range of locations around the region.

As we develop our final DWMP programme and our PR24 business plan, the feedback that we have received as part of this consultation period is continuing to inform the choices that we make. Whilst the formal consultation period has closed, refinement of our plans is an ongoing process and we look forward to continuing to develop our plans working alongside our stakeholders, regulators and customers.

We want to thank everyone who took the time to share their views as part of the consultation period and we look forward to sharing the significant investments that we will be making in the South West region in our final DWMP in May 2023.

If you have any questions about our DWMP you can get in touch with us at DWMP@southwestwater.co.uk

Regulatory feedback

Our responses to detailed comments
from our regulators



Regulatory Feedback

How we are responding to regulatory feedback

We received detailed responses from our regulators and we've outlined our responses to the key themes in the tables below. We're still developing our final DWMP and awaiting some regulatory guidance so we've provided our current thinking on the feedback. We will update these tables as we finalise our DWMP and will link our feedback to where you can find more detail in the sections of our final DWMP document.

Adaptive planning and risk management

Comment on draft DWMP



The DWMP seems to be well aligned with all strategic plans including Price Review 24 (PR24) and Long-Term Delivery Strategy (LTDS) to deliver resilience and SWW's assets (Infra + non -infra).

We believe Nature-Based Solutions should be considered throughout the plan and beyond 10% where possible and we would expect the proportion to grow over time as the knowledge base of South West Water and the wider water industry increases.

We were pleased that the company selected Scenario 1: 'Enhance and Protect' as its preferred programme.

Our response

We are coordinating our planning to provide consistency across our DWMP and Business Planning (PR24) processes.

We know it is important to balance resolving urgent and high impact issues quickly and using **nature-based solutions** which typically take longer to deliver benefits. We will build a plan that explains where we'll deliver nature-based solutions in this next five-year period and build our capability ready for AMP9 to deliver a greater proportion of these solutions. By 2050 we aim to deliver 20% of our solutions through solely-nature-based approaches.

We will be spending 50% of our investment over the next 25 years on blue-green projects that combine nature-based solutions and traditional engineered to remove surface water from our existing sewer network.

Where to find out more in our final DWMP

Our Regional Plan > Natural flood management using nature-based solutions

Our Regional Plan > Our environmental ambition to 2050

Our 'Green First' Approach.

Falmouth Case Study

Our Regional Plan > Assessing What the Future Could Look Like

Our Regional Plan & Data Tables

Technical Summary > Demonstrating our commitment to NBS

We had expected to see an improvement in flood resilience to lower exceedance events, and more detail on the need for adaptation of SWW's asset base and sewer network due to climate change.

Regarding the scenarios used to determine risk, we note that you only consider a 1:50 profile and we could not find reference or consideration of higher frequency /lower impact events within your assessment, this may limit your ability to understand how NBS might offer flood resilience benefits for lower return periods.

With the absence of asset maintenance, the plan only gives a partial picture of the risks and associated costs to manage them.

We are carrying out modelling work to understand the appropriate combination of solutions including where we can use **nature and catchment-based** solutions throughout the next five years.

Surface water separation will be carried out using a range of techniques including sewer rehabilitation and replacement, sewer de-coupling and nature-based solutions. Our results from our models show that the volume of water that we will remove by surface water separation will match or exceed the amount that is captured by network storage solutions. This will have a notable impact on sewer flooding risk.

When looking at the flooding performance of the number of properties that are at significant risk of flooding from a 1:50 year storm event, our flood resilience performance is currently improving. The final DWMP provides further albeit small reductions in risk - whilst protecting against the upward pressures of climate change, population growth and loss of permeable landscapes.

The final DWMP provides clarity of current planning objectives and their profiles going out into the 25-year horizon of the DWMP.

Technical Summary > Our Plan



We note that your plan demonstrates a good appreciation of **adaptive planning**, and you recognise the importance of early warnings and triggers to manage uncertainty and apply interventions at the most suitable and cost-effective time.

You should provide clear evidence showing how **adaptive planning** has been used to inform key expenditure items like storm overflows for specific catchments clearly in your final plan.

In your final DWMP you should report your assessments of risks and uncertainties for other intervening **planning horizons**, for example at 5- and 10-year intervals.

We have and continue to carry out **adaptive planning** in response to varying climate change scenarios. These scenarios include the worst case scenario and the lowest impact for climate change. As we look to invest to address storm overflows and reduce spills, the investment will also reduce future flooding risk.

The final plan shows our storm overflow investment and how **adaptive planning** informs decisions for storm overflow investment over the period to 2050.

The final plan sets our various **planning horizons**; future climate change drivers will help us determine which of these scenarios is most likely to be required.

[Technical Summary > Our adaptive pathways](#)

[Technical Summary > Addressing uncertainties in our plan](#)

[Our Regional Plan](#)

[Data Tables](#)

[Our Data Table Commentaries](#)

Providing a best value plan

Comment on draft DWMP



SWW has indicated an interest to plan and identify environmental and social issues utilising robust natural capital value (£) and social capital value (£) approach which we support.

Our response

We have and continue to develop our final costed solutions, working to ensure costs are comprehensive. We have completed a Strategic Environmental Assessment and this and our willingness to pay programme shows the benefits of our DWMP.

Where to find out more in our final DWMP

[Our Regional Plan > Our Plan](#)

[Our Regional Plan > Addressing uncertainties in our plan](#)

[Technical Summary > Plan Development](#)

[The Plan > Plymouth Case Study](#)

[Falmouth Case Study](#)

Clearer references to other relevant plans and sources of risk which **interact with or can be co-delivered** by SWW's proposals at the catchment level assessments will help give a clearer picture of how sewer flooding solutions might assist or conflict with delivery of increasing resilience against the other risk sources a community may face and help drive future partnership opportunities.

We are carrying out **modelling** to understand how our investments will reduce storm overflow spills and what impact they may also have on future flood risks, reducing some of the negative pressures associated with climate change.

We will continue to liaise with our stakeholders about our plans to ensure that they align with other relevant plans such as River Basin and Flood Risk Management Plans. Our Stakeholder Forum provides us with a regular opportunity to have these conversations. As we move into detailed design we will ensure that we align with the other relevant plans.

The nature of our programme means that co-delivery of solutions is essential and we will continue to develop and create new partnerships to deliver over the coming 25 years.



We are encouraged to see that your **bespoke planning objectives** have been linked to customer expectations and stakeholder feedback for improved water quality at beaches, well-being and tourism. We expect your final DWMP to explain which planning objectives have been prioritised and describe how priorities may change over the 25-year planning period.

We note the importance you place on asset health and how you are considering changes to how you operate assets to improve performance and capacity, as well as targeting no deterioration in asset health performance.

In your final plan, you should clearly set out how improved **asset management** and optimisation (base expenditure activities) can address some of your risks, as part of a hierarchy of options, before recommending enhancement schemes. You should ensure that you are able, and continue to be able, to meet all legal obligations, both now and in the future.

As part of our consultation process during the formal period, and in subsequent events we listened to the priorities of our customers and stakeholders and have updated our **bespoke objectives** in line with those views.

Our scenario analysis and adaptive planning explains how we have considered customer priorities now and in the future.

Our final DWMP reflects our wastewater plan – we have included base activities and other wastewater investments to provide a complete picture.

Our business plan is an optimised plan. From our asset management processes we have assessed the overlaps between enhancement and base expenditures as we look to maintain compliance and deliver improvements efficiently and effectively.

Base expenditure innovative activities are the reason we have improved our planning objectives such as external flooding, reduced the number of blockages and are reducing the number of properties at significant risk from 1:50 year flooding event.

Our Regional Plan > Assessing What the Future Could Look Like

Technical Summary > Plan Development

Our Regional Plan > Our Plan > Our Preferred Plan – Best value

Falmouth Case Study

Our ‘Green First’ Approach

Our Regional Plan > Natural Flood Management using nature-based solutions

Our ‘Green First’ Approach

Our Regional Plan > What are our options?

Technical Summary > How we manage our assets

Examples of recent innovations include the installation of sewer depth monitors, which provide immediate alerts as to whether there are blockages in the sewer. This enables our teams to proactively visit site, avoiding potentially more significant events such as a collapse or spill. We are currently on track to roll out 9000 units across our sewer network. The data we collect is being used to support prediction of future failures and management of the network. This activity defers the need for additional investment due to the increased pressures of climate change.

You should provide clarity in your final DWMP on your definition of **best value** and how you have quantified the multiple benefits of solutions.

We have clarified how we have determined that our final DWMP is the **best value plan**, including how we have considered the multiple benefits of our solutions.

Technical Summary > Detail of our best value plan

We note that nature-based solutions form a key consideration in your decision-making process, and that your preferred plan promotes the use of lower carbon, nature-based solutions. In your final plan you should provide clarity on how, where and when your nature-based ambition will be realised and further detail on why green options are not being pursued, where applicable.

We anticipate that our final DWMP will include a range of nature and catchment-based solutions, alongside more traditional engineered solutions. We recognise the importance of achieving our net zero operational carbon ambition and the impact of increased investment on this target. We have also heard from our customers that whilst they support nature and catchment-based solutions, they are keen for us to resolve urgent and high-impact issues quickly. We will aim to balance our programme in our final DWMP to meet these competing priorities.

Our solutions will include:

- Sewer Relining and replacement
- Removing the connections between our Combined Sewer Overflows (CSO) and storm water pipes and culverts
- Upstream and Urban soak-aways e.g. swales, permeable pavements/surfaces, roadway plantations, water reuse community gardens and smart water butts.
- Upstream and Urban attenuation – leaky dams, wetlands, reed beds, water sensitive city features.



We support nature-based approaches to creating space for water, as identified in your plan, as well as using tree and hedge planting to prevent water from entering the system.

We acknowledge this comment and will work to balance the needs of our customers for rapid resolution to high priority issues with the longer-term benefits of nature and catchment-based solutions.

Our 'Green First' Approach
Our Regional Plan > Natural flood management using nature-based solutions
Technical Summary > Demonstrating our commitment to NBS

Cost, funding and affordability

Comment on draft DWMP



There is recognition that the DWMP will inform a very significant proportion of the wastewater element of PR24 Business Plan. It should contain all the wastewater expenditure, even if it hasn't all been directly informed by the DWMP process.

We would like to explore investment profiles to understand how SWW will realise schemes that deliver multiple benefits for customers and the environment,

We don't understand why four of the five scenarios cost the same amount (£8.4bn) with identical costs allocated to each risk driver, the only variable being the timing.

Our response

Our final DWMP reflects the scale and extent of the wastewater programme in May 2023, however we continue to discuss our overall plans with stakeholders and regulators. In particular we are working through the feedback from the Environment Agency relating to the WINEP. As we build our programme, we will consider affordability for customers and balancing the needs of our customer, the environment and any regulatory change between May and when we submit our business plan in October.

Where to find out more in our final DWMP

Our Regional Plan > Financing and bill impacts
Our Regional Plan > Our Stakeholder and Customer Views
Technical Summary > Delivering Multiple Benefits

Technical Summary > Our Plan

Delivering projects based on co-funding and partnership opportunities is an area the company needs to focus on as this plan and future DWMPs are developed; we would expect the final plan to include an initial phase for more engagement.

It is good to see the customer feedback and agreement from the willingness to pay exercise for an increased investment to manage sewer flooding. The realism of the increase to customer bills is good to see, however please note there are also opportunities to discuss using external funding such as Flood Defence Grant in Aid (which SWW currently under utilise) to help alleviate this pressure.

For the final plan costs we explain and expand our analyses of scenarios. In our draft plans, the costs to 2050 were for a single future only – but we have extended the analyses to look at alternative futures.

We are modelling the impact that reducing the number of storm overflows we have spilling to the environment will also impact future flood risks.

We engage with our customers and stakeholders through a range of partnerships, forums and research groups to better understand and work collaboratively to understand priorities and reduce future flood risks. Our engagement has included our Upstream Thinking Partners, Stakeholder forums, our WaterShare+ Customer Advisory Board and focus groups. We outline in our final DWMP who we have worked with in the formal consultation period and subsequent conversations.



We note how you presented five key scenarios that were considered in the development of your preferred plan. **'Best value'** is well defined, and we note that you have provided an estimate for both approaches (best value and lowest whole life cost). However, in most cases it is not clear how you have determined these costs.

In your final DWMP, you should provide further evidence on cost estimates for specific solutions to better understand how the high-level estimates have been determined.

We note that you have started to identify potential opportunities to **co-develop, co-design and co-fund solutions** across your region.

However, we are not clear on the maturity of these opportunities. Your final plan should include details about partnership opportunities and co-funding solutions such as location, partners, timescales, the split in funding contributions and whether funding has been confirmed.

We acknowledge this feedback and provide more information on our hydraulic modelling and cost methodology as part of our DWMP to provide clarity on how we have developed our costs and defined **best value**.

We've increased our hydraulic modelling coverage. We have also used data from working in catchments and undertaking investigations to build cost confidence. We are also carrying out further analyses through site visits and more detailed costing analyses. We use this extended hydraulic modelling coverage and additional data from site assessments to improve our understanding and enable us to better understand **cost estimates** across the wider region.

Our Regional Plan > Balancing the investment plan
Technical Summary > Detail of our best value plan

Our Regional Plan > Plymouth Case Study
The Falmouth Case Study

Our Regional Plan > Financing and Bill Impacts

We are encouraged to see that you have provided high level costs for five scenarios and that you have provided a breakdown of investment over the 25-year planning period. For your final plan you should explain the range of costs and bill impacts associated with addressing customers' priorities for each scenario and your overall preferred best value plan.

You should provide further evidence in your final plan that provides the rationale for enhancement expenditure requirements for PR24.

In your final plan you should provide detail on the investment requirements for individual, significant schemes.

We are actively exploring opportunities to **co-develop, co-design and co-fund solutions** across the region. At Plymouth and Falmouth we are discussing potential sustainable urban drainage schemes with the local authorities. We will continue to develop and cost these schemes which combine eliminating storm water runoff through approaches such as permeable pavements, water reuse in community rain gardens and slowing the flow of water at peak times. We are also working with Plymouth City Council in a strategic partnership to establish Plymouth as a 'sponge city'.

We understand how important it is for our customers to connect the work that we are delivering to their water bills. Our final DWMP provides clarity around our costs and the impact on our customers' bills. We provide more detail where we are delivering large schemes that will spread across multiple five-year investment periods; these include Ilsham Valley, Central Plymouth and Maer Lane, Exmouth.



We are pleased that the company has included an indication of high level costs and bill impacts in the plan. Ultimately, there has to be a compromise between the company's ambition and the impact of investment costs on customers' bills and this should be informed by engagement with customers to establish their priorities and their willingness to pay, across all areas of expenditure not just drainage, and the pace with which they want to see improvement.

It must also run in tandem with measures to protect financially vulnerable customers who may face affordability issues with increasing bills. The single water affordability scheme, which Defra is considering, is key to unlocking investment by protecting those least able to pay, which we know you are supportive of.

We provide updated bill impacts in the final DWMP. These may still change as we build our final investment programme.

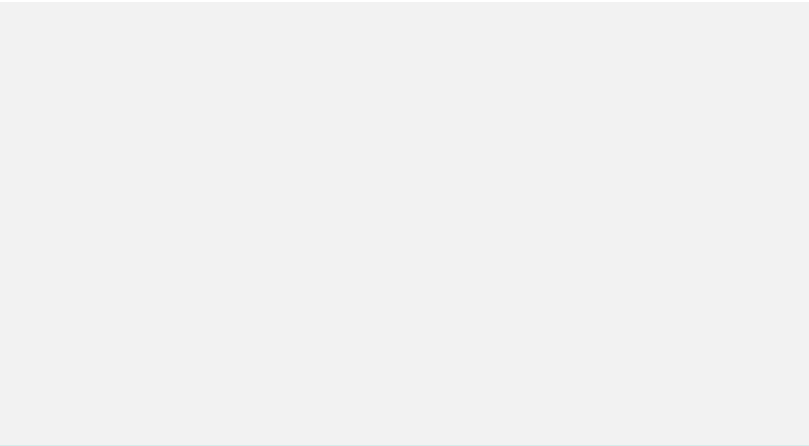
We have comprehensive willingness to pay data – collected since the draft plan was published in June. This shows the appetite for change and a much higher willingness to pay than previously experienced – but for some customers paying anything extra at all is difficult. Customers don't want investment to be paced at the rate of those that can afford to pay the least. This is summarised in the final DWMP.

Our Regional Plan > Financing and Bill Impacts

Our Regional Plan > Financing and Bill Impacts

Our Regional Plan > Our Stakeholder and Customer Views > Willingness To Pay

We also note the huge range in customer “Willingness to Pay”. Given the importance of this issue, we would like to see a lot more detail, in the final plan, to illustrate these different views, any the gap in funding requirements between “environmental organisations” and customers, and how the company has taken account of the customer and stakeholder views.



Storm overflows

Comment on draft DWMP



The three Defra Storm Overflow sub-targets have been addressed, but we would have expected to see some more ambition, **going beyond government targets** and providing detail about how the specific targets will be addressed.

We expect to see how the plan will address all the **storm overflow discharge reduction plan targets** in accordance with the milestones, by the final submission in March 2023.

South West Water has provided a preferred 'protect and enhance' scenario that meets those targets and milestones set within the Storm Overflow Discharge Reduction Plan (SODRP), albeit with limited detail on shellfish and bathing waters. We anticipated much more evidence in South West Water's plan regarding how near-real time reporting of **EDM and continuous water quality monitoring will inform adaptive planning.**

Our response

Our Draft DWMP reflected the government targets set out ahead of the June 2022 publication. Our final DWMP reflects the requirements set out within the Government SODRP and the WINEP guidance received from the EA. We have presented our preferred plans to the Environment Agency and Ofwat as part of our recent WINEP submissions and these have been balanced with the wider range of outcomes within the DWMP.

We have installed 100% of our **Event Duration Monitors**, ahead of our deadline of December 2023. We share spill information through our WaterFit Live website (start/stop). Our adaptive plans look to how we may adapt our plans as the future becomes more certain – with issues such as climate change and prioritise the key drivers of our adaptive plans.

Where to find out more in our final DWMP

SODRP Alignment

Our Regional Plan > Our Plan

Useful external links:

www.southwestwater.co.uk/environment/waterfit/waterfitlive/
www.gov.uk/government/publications/storm-overflows-discharge-reduction-plan



We note that you have acknowledged the need to address the storm overflow targets and you identify indicative investment requirements for doing so in three of your five DWMP scenarios.

You also provide a high-level indication of the investment profile over time for storm overflows in your preferred 'enhance and protect' plan and have identified the number of overflows that will require improvement, with ambition to deliver some overflow improvements early.

We expect to see a more detailed and robust **timeline and evidence on the costs** for storm overflow schemes in your final DWMP, particularly where you may have made changes to your preferred plan since this dDWMP.

Our DWMP plan provides information on each of the 275 locations that we will invest in during AMP8 – and our strategy for the subsequent AMPs.

It should be noted that we will also provide our plan for these and all the other individual storm overflows at the end of June. This will align with our DWMP.

The scale and type of our investment in storm overflows is unlike any investment programme before so it is essential to continue to improve the accuracy of our modelling and cost estimates as we plan our investment for future AMPs.

Our Regional Plan

Our SODRP Alignment document

Our Data Tables



We agree that those Storm overflows that are causing **ecological harm to sensitive environmental areas should be targeted first**. This needs to be prioritised based on evidence that reducing spills will have a positive impact on river water quality. We are pleased to note that the company are undertaking investigations for all locations that spill more than 40 times a year.

Our extensive modelling and investigations enable us to develop a programme that **balances customer and environmental needs**. It is also important that our plan is deliverable and from our work with our supply chain and partners to put plans in place – we can ensure we can meet our final DWMP commitments.

Our Regional Plan > Our Plan

Environmental Ambition

Comment on draft DWMP



Climate change is referenced throughout the draft DWMP. The impact of climate has been a central consideration of the plan and resilience to those impacts has been given a high priority in the plan.

It is important that **bespoke planning objectives** are developed by engaging with stakeholders. This does not appear to be the case and there is no reference to it in the stakeholder engagement section of the Technical Summary.

Our response

As part of our consultation process during the formal period, and in subsequent events we continue to listen to the priorities of our customers and stakeholders. As we developed our final DWMP we included **bespoke objectives** that reflected the feedback we received, such as on raising WWTW standards and on coastal erosion and flood inundation.

Where to find out more in our final DWMP

The Plan > Assessing What the Future Could Look Like

Technical Summary > Plan development

Our ‘Green First’ Approach

Our Regional Plan> Natural Flood Management Using Nature-Based Solutions

Falmouth Case Study

Our ‘Green First’ Approach

Our Strategic Environmental Assessment

There seems to be a lack of commitment for **nature-based solutions** (NBS) within this DWMP. Whilst there is reference to NBS for surface water separation, it is unclear how and when this occurs in the delivery programme, and to what extent this would assist the company in achieving associated spill standards.

More leadership and innovation were expected around the use of NBS for treatment and disconnecting surface water from the network, improving quality and reducing quantity.

Discussion on **carbon** is very limited in the main document but there is a link to the company's net zero plan. We welcome the inclusion of Natural Flood Management (NFM) planned with scenario 1, likely to have a lower impact on carbon footprint and emissions.

Our draft DWMP made a commitment to at least 10% of our activities on NBS in AMP8, rising to 20% in later AMPs. We continue this commitment in our final DWMP.

Our final DWMP includes a range of **nature and catchment-based solutions**, alongside more traditional engineered solutions. We recognise the importance of achieving our net zero operational carbon ambition and the impact of increased investment on this target. We have also heard from our customers that whilst they support nature and catchment-based solutions, they are keen for us to resolve urgent and high-impact issues quickly. We balance our programme in the final DWMP to meet these competing priorities.

Our approach to **nature and catchment-based solutions** is to ensure we meet the targets for spills and meet our customers' needs for urgent issues to be prioritised. We will use AMP8 to develop our understanding of how effective nature and catchment-based approaches are and where possible, use a combination of traditional and innovative solutions to meet the spill reduction targets.

Our solutions will include:

- Sewer Relining and replacement

- Removing the connections between our Combined Sewer Overflows (CSO) and storm water pipes and culverts
- Upstream and Urban soak-aways e.g. swales, permeable pavements/surfaces, roadway plantations, water reuse community gardens and smart water butts
- Upstream and Urban attenuation – leaky dams, wetlands, reed beds, water sensitive city features

We are committed to delivering net zero for operational **carbon** by 2030. The carbon impact of all of our potential solutions has been calculated and this has formed part of our decision-making process as we develop our final solutions.

We have worked with our partners to develop a Strategic Environment Assessment that forms part of our final DWMP submission.



Nature-based solutions appear to be a key consideration in your DWMP decision-making and optioneering processes. However, we are unclear how you will deliver against your green ambitions when addressing specific storm overflow targets, therefore you should provide further detail and clarity on this in your final DWMP

On a volumetric basis our aim is for interventions to be focused towards surface water separation, and within that to maximise the use of nature and catchment-based solutions as much as possible in line with our abilities to meet the regulatory deadlines and stakeholder partnerships. We provide detail on the balance of solution types in our final DWMP.

Our 'Green First' Approach

Technical Summary > Demonstrating our commitment to NBS

Technical Summary > Surface water separation; SuDS and nature-based solutions



With more frequent severe rainfall events becoming more likely with Climate Change, separation of these systems is increasingly more important in mitigating against pollution incidents occurring. We would expect the company to work with developers to ensure **separation in all new developments**. Other separation schemes need to consider areas at high risk of sewer flooding, opportunities for collaboration should be paced to spread the cost.

We welcome the recent changes to Schedule 3 of the Flood and Water Management Act (2010) that recommends that sustainable drainage systems are mandatory to **new developments** and provides all water companies with a framework to approve and adopt new drainage systems. This new approach is expected to be implemented during 2024 and we are developing our policies in light of this change to the regulations.

Our Regional Plan > Natural flood management using nature-based solutions

Our Regional Plan > Delivering our plan > Building on our existing partnerships

Stakeholder and customer engagement

Comment on draft DWMP



We acknowledge the more active engagement over 2022, providing us the opportunity to comment on Level 3 plans, and to contribute to identifying opportunities for collaborative working for specific catchments. However, we would have liked the opportunity to engage earlier in the plan development.

Despite the mixed engagement throughout the development of the DWMP, we have been encouraged by South West Water's enthusiasm to engage during the DWMP consultation period workshops, and we hope the company will maintain this level of active engagement for cycle 2.

Our response

We have taken this feedback onboard and ramped up our approach to engagement so that our engagement with stakeholders is as high quality as our engagement with customers. We provided multiple opportunities for all parties to engage with our plans.

Even though the formal consultation period has closed, we continue to create opportunities to develop and share our plans with customers, stakeholders and regulators. We use our Stakeholder Forums, Customer Board, regular customer engagement events (focus groups, surveys, workshops etc), our normal day to day interactions (Facebook, tweets, contacts, etc), and customer and stakeholder attendance at our quarterly Watershare+ public meetings (that are similar to the recent 'Your water, your say' events) to ensure we hear and respond to a diverse range of views.

Where to find out more in our final DWMP

**Our regional Plan > Our stakeholder and customer views
Falmouth Case Study**

We would welcome recognition of the opportunity to work with our Area teams locally to you in the 'continuing to review our plan' section of the technical summary to ensure alignment with our own modelling and evidence gathering activities, working towards a single version of the truth so we can collectively plan solutions through the South West Integrated Framework Team (SWIFT).



We note the engagement that you have carried out to seek endorsement of your plan from different strategic partners and stakeholders.

You should undertake further engagement with customers to understand their acceptability of potential bill increases (for example their willingness to pay for your preferred plan), if not already carried out. You should also consider the responses to your dDWMP consultation, and any additional engagement, and explain how these have influenced your final DWMP.

Our Stakeholder Forum that was carried out during the consultation period brought together public sector, charities and the private sector to provide feedback on our plans. We had strong levels of understanding on the work that we're undertaking and planning to deliver and high levels of engagement from organisations wanting to work with us to shape our plans for the future.

Our customer engagement continues as normal – using a range of methods.

Our regional Plan > Our stakeholder and customer views

Our Regional Plan > Delivering our plan > Building on our existing partnerships



The company has invested a considerable amount of time, effort and resources into the engagement process. It has engaged with a wide range of stakeholders and organisations who have a role in drainage and planning, as evidenced by the emphasis in the plan and technical documents to feedback and engagement.

We are therefore encouraged that the company provided an easy-to-understand summary of the draft plan and of the priority areas for this wider audience. The company has an easy-to-understand webpage about the DWMP.

We would like to see the company develop these documents and webpages further for the final plan, notably to include likely bill impacts in the customer document and consider approaches to make the plan easier to access and understand.

The company has provided a summary of the stakeholder research in the technical reports, which is welcome. In the final plan we would like to see a headline figure of how many partnership opportunities this engagement is likely to have generated.

We welcome this feedback and are committed to improving the accessibility of the information we provide. This information will clearly include information on costs and bill impacts.

South West Water has played a leading role in the establishment of Catchment Partnerships since 2011 and the evolution of the catchment-based approach.

We have worked hard to build catchment partnership opportunities. This has included chairing the Cornwall Catchment Partnership, ongoing Catchment Partnership meetings across the region, convening the Catchment Partnership officers and coordinators on a quarterly basis – along with 1-2-1 meetings.

- Both the officers and the coordinators are on our stakeholder mailing list and are invited to attend the Stakeholder Forum, as well as the DWMP workshops and regional engagement in WRMP in September 2022

Our Regional Plan > Our stakeholder and customer views

Our Regional Plan > Delivering our plan > Building on our existing partnerships

- South West Water has played a leading role in the establishment of Catchment Partnerships in 2011 and the evolution of the catchment-based approach.

We're also involved in the new Coastal Based Approach (which links marine and terrestrial management) and the pilot in Cornwall, as well as the various Estuary Partnerships and the Local Nature Partnerships in Devon and Cornwall.

A specific plan

Comment on draft DWMP



The catchment summaries are a well-structured view of the risks and issues to SWW's network and assets. They are, however, tasked with depicting the pressures of the climate emergency on specific sites, and more could be done to make this locally relevant.

Our response

Our final DWMP provides details at Level 2 (planning area level) and Level 3 (one for each of our wastewater treatment catchment areas available for stakeholders / authorities / potential delivery partners). We also discuss the impact of our plans on major conurbations. We recognise that there are hotspots in our region due to environmental and geographical factors and we share examples of key schemes that will address these.

Where to find out more in our final DWMP

Our Regional Plan

Technical Summary

Level 2 Technical Appendices

Level 3 Technical Appendices

The 25-year environment plan driver is specifically focussed on coastal erosion and coastal flooding and we outline the impacts and our planned investment on our sewage pumping stations, treatment works and across the sewerage network.

Customer and Stakeholder feedback

Our responses to detailed comments from our customers and stakeholders



Balancing our investment choices

We heard...

Relying on customers to change their behaviour was seen as the lowest priority for interventions, with investment in our asset base and rethinking how we design and operate our systems seen as higher priorities.

The environment was a significant factor in the views of our customers with 96% wanting us to ensure nature-based solutions formed part or the majority of our delivery of solutions where feasible.

49% thought traditional engineered solutions should be used for high impact and urgent solutions given the certainty they provide.

Our response

We've heard that our customers are keen to ensure we prioritise resolving high impact and urgent solutions with more traditional engineered solutions. Younger customers in particular have this view.

We also recognise how important it is to our customers that we balance nature-based and more traditional schemes.

We are focused on better understanding how we can use catchment-based interventions to reduce the risk of surface water flooding and storm overflows. We're focussed on getting pilot projects started as quickly as possible and engaging with local councils to identify areas where land is available for both nature and catchment-based solutions. These types of schemes require both partnerships and available land to deliver them.

We also need to work closely with our customers and stakeholders to ensure they're aware of the impact of our changing approach to delivering improvements that are often more distributed throughout areas.

Where to find out more in our final DWMP

Our 'Green First' approach

Our Regional Plan > Delivering our plan > Building on our existing partnerships

Falmouth Case Study

Costs, funding and affordability

Comment on draft DWMP

Our response

Where to find out more in our final DWMP

90% agreed or strongly agreed that a step change in the level of investment is necessary to protect the environment.

Over 60% agreed that the plans will help to support tourism and local communities in the region.

There was strong support for bill increases to reduce storm overflows with 69% supporting a bill increase of £65 to improve storm overflows, but with 24% thinking water companies and bill payers should fund all the necessary improvements to meet storm overflow targets, and 50% thinking that the Government or other bodies should contribute to these improvements through match funding and similar schemes.

Half of respondents prefer a smoothed investment profile with a gradual rise in bills with outputs delivered throughout the period, which could allow for a balance between nature-based and engineered solutions.

We share the views of our customers and stakeholders of the importance of protecting and improving our environment. We will carry out projects on both the River Dart and Tavy specifically to improve inland bathing water quality which will have a positive impact on both the environment and support local tourism.

We have a strong focus on continuing to invest in our bathing water, our storm overflow programme and WaterFit Live, demonstrating that we understand how critical these areas are to the environment, communities and economy of the South West.

The cost is a theme we've heard from many of our customers – is our programme affordable and what is it going to cost? Looking at the programme, storm overflows is a priority and we recognise the importance of ensuring that bills are affordable. We have created greater certainty around our costs to provide confidence for customers and we have researched how progressive charges can ensure affordable bills for all even with this step up in investment.

The Plan > Dart and Tavy Case Study

Our Regional Plan > Financing and bill impacts

Useful Link:

[WaterFit Live](#)

Environmental Performance

Comment on draft DWMP

Improving storm overflow performance was seen as the highest priority for 30% of our customers and stakeholders in the consultation. What is more important is that we address harm and recreational issues. 33% prioritised no ecological harm from overflows as the most important Defra target.

90% supported investment to provide near real-time monitoring of water quality at bathing water beaches.

Some customers and stakeholders felt our plans weren't sufficiently ambitious, for example meeting the Defra target of 10 spills still felt too high and Rivers Not Achieving Good Status (RNAGs) should be less than 10% by 2030.

Our response

We understand the concern of our customers and stakeholders and storm overflow investment is our most significant expenditure item for our final DWMP. The level of investment in this area recognises the significance of this issue and our commitment to make a significant improvement in spill reduction.

We are rolling out WaterFit Live and intend to learn from this programme and extend out to the rest of the region.

We acknowledge the feedback and our final DWMP goes beyond achieving 10 spills by 2050 – as we look to accelerate plans and deliver minimal spills to achieve WaterFit 2040, with the first priority on ecologically sensitive waters and bathing waters - where the standard is already higher at 2 spills per bathing season.

As part of our Upstream Thinking initiative we work with landowners and farmers who are a source of diffuse pollutants. We have undertaken analysis of nutrient run-off from agricultural land in specific catchments and this has shown that land can be an excessive source of increased nutrient levels in rivers. We will continue to work with landowners, farmers and stakeholders within catchments to look for solutions that control pollution at source. We know from our partnerships and listening to consultees that improving water quality is a goal that is shared amongst everyone who is linked to the water environment.

We follow the current reporting framework as set out by the Environment Agency for providing information on storm overflow discharges. We already have 100% event duration monitoring (EDM) coverage – ahead of target.

Where to find out more in our final DWMP

[WaterFit Live](#)

Our Regional Plan > Our Plan

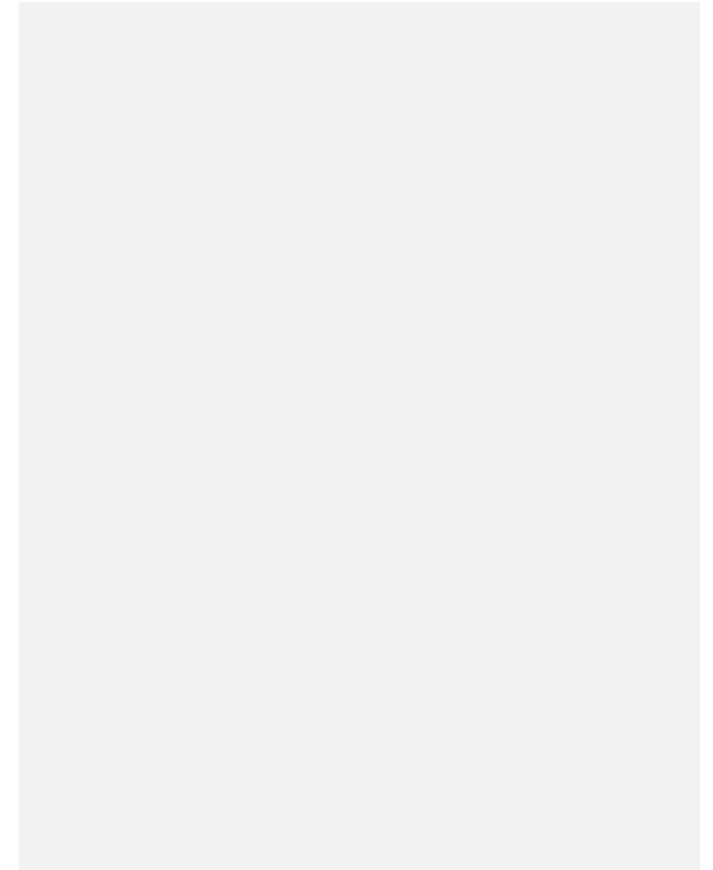
SWW's Upstream Thinking:

[Upstream Thinking](#)

Water quality due to storm overflows was raised as the key issue rather than the number of overflows. Some customers and stakeholders were surprised that analysis of overflows is based on the number of incidents rather than the volume discharged.

We were asked whether analysis has been undertaken to assess the pollution impacts of agricultural runoff and any other sources. This would allow SWW's plans to be put into context in terms of the overall water quality of the river. We recognise that this requires a holistic multi-agency approach, but it is surely essential to ensure that all effort and money is spent effectively.

Historically we have only reported EDM data annually in line with the EA reporting framework. Through our launch of WaterFit Live we are providing information on our storm discharges, using data from our event duration monitors, and this is available online to the public.



Customers and stakeholders expressed some concern about whether the current monitoring and reporting framework is inadequate. For some, real-world performance is not reflected by the current framework, citing examples of works that overflow but still are compliant. For some, the framework, reporting and transparency must all be improved.

Natural England would expect a clearly identifiable Habitats Risk Assessment (HRA), which follows the statutory process outlined by legislation:

Natural England would recommend the completion of a full Strategic Environmental Assessment (SEA) for the draft DWMP.

We heard specific feedback about the flood resilience data that we provided including the accuracy of this data and whether the DWMP will resolve the issues it sets out to do.

We acknowledge this feedback and the findings are in our final document.

We acknowledge this feedback and the findings of an SEA are in our final document.

We have undertaken hydraulic modelling using the latest data from the Met Office. This has updated our coastal flooding and erosion evidence and we are comparing our data with the Environment Agency for joint interventions.

Habitat Risk Assessment

Strategic Environmental Assessment

Our Technical summary

Intermediate targets would be welcomed for river water quality alongside the 2050 targets.

Recent changes in leisure patterns in the Dart have resulted in a great increase in the number of swimmers, paddleboarders, canoeists and others who are exposed to river pollution; for example 1600 swimmers in the 'Dart 10k Swim'. We therefore believe it is time to re-categorise the Dart to a level of pollution protection equivalent to a designated Bathing Water, and call on SWW to facilitate this.

Investment and focus on bathing waters has paid off. We congratulate SWW on achievements here and would like to see the same focus and investment in reducing pollution in rivers.

The legal date to meet storm overflow targets is 2050, however there are intermediate targets before 2050 that we also need to achieve. The Environment Act, and subsequent Storm Overflow Reduction Plan in August 2022, defines these targets. We recognise that the timing of our consultation period meant that these intermediate targets were not available for our draft plan. Our final DWMP reflects and accelerates ahead of these final targets to achieve WaterFit 2040. We will invest at every bathing water location between now and 2030 in line with customer views.

We are supporting the Dart Swimmers to prepare an application for an Inland Bathing Water Designation for the River Dart. We welcome the opportunity to work with the community on this application and are supportive of the application being made.

We acknowledge this comment and recognise the importance of both bathing water and river water quality improvements in the DWMP outcomes.

Our Regional Plan > Delivering our plan

Our Regional Plan > Dart and Tavy Case Study

Stakeholder and customer engagement

Comment on draft DWMP	Our response	Where to find out more in our final DWMP
<p>We heard that customers want more information on exactly what we plan to do in their local areas, and didn't always find this in the documentation.</p> <p>Our customer summary documentation was seen as too long. Providing core summary overviews with links to technical plans will strike a better balance.</p>	<p>We will continue to provide the reports at the different levels and, recognising that customers may not go to these, we are providing a shorter customer summary. Our final DWMP will enable readers to quickly understand our plans and how to locate more location specific information. We'll reference our technical documents to enable readers to find more detail easily if they'd like to know more about our plans.</p> <p>Our plans will be at 'Level 2' or catchment level, but we'll ensure that we share our regional investment plans and highlight major population centres that we will be investing in.</p>	<p>Customer Summary</p> <p>Level 2 Plans</p> <p>WaterFit Live</p>
<p>We heard that it would be helpful if we could provide customers with information on the impact of discharging rainwater to the foul sewer network. It could be presented together with various suggestions ranging from separating the flow and diverting to soak aways, to installing inline rainwater butts to reduce peak flows as suggested in by SWW in the workshop.</p> <p>Devon Wildlife Trust can help with behavioural change campaigns with residents and community groups, and with nature-based solutions schemes.</p>	<p>We are working with our stakeholders to help inform individuals about the actions they can take to both reduce water consumption and the volume of water discharged into sewers. This information is already included in our WaterFit Live information sections, and we'll continue to provide information, including how water butts, rain gardens, and water efficiency measures can help.</p> <p>We welcome this support and will continue to work with stakeholders and develop partnerships as we build our delivery approach for the DWMP.</p>	<p>WaterFit Live</p> <p>Our DWMP</p> <p>We would encourage organisations interested in collaborating to get in touch via Our DWMP webpage (above)</p>

Increased transparency about water quality in rivers and at bathing waters would be welcomed. There is limited information on frequency of overflows/spills/flooding at specific locations in the Level 2 draft plan.

We acknowledge this feedback and we are currently rolling out WaterFit Live which will provide water quality management information to the public alongside beach managers. This will be throughout the region and provide near real-time data on designated bathing waters and shellfish waters.

[WaterFit Live](#)

Stakeholders wanted us to consider County Carbon Reductions Plans as part of our wider consideration in aligning DWMP outcomes.

We will continue to liaise with our stakeholders about our plans to ensure that they align with other relevant plans. Our Stakeholder Forum provides us with a regular opportunity to have these conversations. As we move into detailed design we will ensure that we align with the other relevant plans.

Our Regional Plan > Our stakeholder and customer views
Falmouth Case Study

We received offers of support for partnership working to help us collaborate on planning and developing blue-green infrastructure to ensure that it is well embedded

We welcome this support and will continue to work with stakeholders and develop partnerships as we build our delivery approach for the DWMP.

Our Regional Plan > Our stakeholder and customer views
Our Regional Plan > Plymouth Case Study
Our Regional Plan > Sidmouth Case Study
Falmouth Case Study

Appendix 1. Stakeholder Groups

The following is a list of the stakeholder groups who participated in the consultation. We recognise that this list is not exhaustive as some participants in our workshops chose not to provide organisational details. We are grateful to all participants for sharing their feedback and engaging in the consultation process.

- Aune Conservation Association
- Aveton Gifford Parish Council
- British Canoeing
- Consumer Council for Water (CCW)
- CEG
- Chardstock Eco Group
- Country Land and Business Association
- Climate Vision
- Cornwall Catchment Partnership
- Cornwall Council
- Cornwall Wildlife Trust
- Council of the Isles of Scilly
- Dart Harbour and Navigation Authority
- Dartmouth and Kingswear Society
- Devon Wildlife Trust
- Dittisham Parish Council
- East Devon AONB
- Environment Agency*
- Ermington Parish Council
- National Farmers Union
- National Trust
- Natural England
- North Devon Council
- Plymouth City Council
- Portreath Parish Council
- RSPB
- South Devon AONB Estuaries Partnership
- South Milton Climate Action and Nature Group
- South West Rivers Association
- Teinbridge District Council
- The Flete Estate
- University of Exeter
- Westcountry Rivers Trust
- Woodland Trust
- Wye Valley Forest Protection Group

*Local Environment Agency representation at stakeholder workshops