Water Resources Management Plan response to public consultation

VWP published a draft Water Resources Management Plan for public consultation on 30/04/2018 requesting feedback on the content.
The table below indicates the feedback received, the VWP initial response and the modification that will occur in the water resources management plan itself.
The water resources management plan is viewed by VWP as a 'live' document and will be regularly reviewed with a proactive approach in terms of seeking additional feedback from key stakeholders.
The plan is being utilised by VWP Operational staff and internal feedback on its functionality will be sought to ensure it continues to be fit for purpose.

Points of note:

A Veolia is an inset / NAV and therefore does not complete Price Reviews (PR19) because we have to mirror Wessex and Southern tariffs (according to which supply area properties used to fall within)
This limits the options for improvement options as these can not be funded via future increases in customer bills to compensate

B Size, there are less than 1000 true regulated customers, the others are either Wessex customers, beyond the wire or are MoD customers attached to a regulated network
Therefore we need proportionate reporting, but take into account that additional non-regulated and neighbouring regulated customers are attached to the network

S/N	Type	Issue	Feedback	Response	Modification to Report
O1	OFWAT - Comment	Supporting Documentation	Needs to be clearer reference to supporting documentation	Consider taking out the technical elements, put them into their own area and reference as supporting documentation. Operations would like to see a WRMP Lite document that contains only the critical information	None
O2	OFWAT - Comment	2017 - 2040 v 2020 - 2045	Consistent planning period	This is because from 2017 to 2020 we have a lot of development activity. From 2020 onwards there is little activity. Wanted to include 2017 to 2020 to ensure that actual demand matches predicted demand as after 2020 demand should be fairly stable	All references to 2040 have been replace with 2045. Executive summary paragraph 2, Introduction end of paragraph 1. End of section 4.1 the year 2045 has been added to the table
O3	OFWAT - Comment	Levels of Service table	Water usage restrictions should be based upon future predicted performance not past results	Refer to row 13 DMP. EA are willing to help find more rainfall data and borehole data to allow future restrictions frequency to be determined	Section 2.4 Levels of Service table updated and commentary added
O4	OFWAT - Comment	Customer participation	Need evidence of engagement with the local domestic customers	Conversation held with CCWater. Given the small number of regulated connections (approx 1000) then best method forward is to communicate with messages on company webpage in relation to water efficiency, leak spotters and similar initiatives	Extra section added at end of section 2.4 explaining the situation and customer engagement strategy
O5	OFWAT - Comment	Planning Tables	Inconsistences in narrative	Narrative is based on the annual return, where we have detailed information. Add detail to the planning tables in line with the annual return	Description of the use of the planning tables included in section 3.2
O6	OFWAT - Comment	PCC	Too high in planning tables. Military personnel?	This is because the military personnel / population was not included in the planning tables. When included the PCC becomes realistic	Refer to the end of section 3.2 where comments have been added referring to more accurate data now being provided as part of the WRMP annual supply / demand assessment
O7	OFWAT - Comment	MoD Use	Uncertainty due to missing flow data	This has been corrected and leakage has reduced as a result, but MoD use has gone up (which is to be expected)	None - Refer to section 3.3. Most meters are connected to an AMR system.
O8	OFWAT - Comment	Leakage	How is this calculated?	In the planning tables we assumed the worst case situation. Calculations performed using Netbase (commercially available software) that uses best practice to calculate leakage. A procedure covering the leakage calculation is now included on our Local Management System	Refer to change at beginning of section 3.4
O9	OFWAT - Comment	Climate Change	Will this impact on deployable output?	Need to access EA ground water modelling. No experience of low water tables at boreholes	Refer to modification at end of section 3.5

O10	OFWAT - Comment	Outage / headroom	Non-drought resilience - more detail required	Complex monte-carlo analysis was included, but better to look at historic maintenance and asset health. Planned maintenance now occurring outside of peak demand periods	New section 4.3 added to provide detail of non-drought resilience efforts going forward
O11	OFWAT - Comment	Leckford Bridge	Wessex Water under drought conditions	Should be in the DMP. Proposals are included to improve output to licence so that don't need to limit flow to LB in the future	Refer to section 2.3 for an agreed common statement from Wessex and Veolia
O12	OFWAT - Comment	Outage / headroom	Planning tables and headroom	From the analysis outage risk and headroom requirements are a very small volume and implementation of CMMS and preventative maintenance will remove this risk	Section 4.3 details methods being utilised to minimise risk due to outage
O13	OFWAT - Comment	Quality of borehole water	Collect further data and investigate the catchment area	Catchment area has been identified. Desk top exercise indicates only 1 farm with 2 silos, most of area is military target range	Refer to section 2.5 for reivew of upstream pesticide risks
O14	OFWAT - Comment	Water efficiency schemes	Assess benefits and customer participation	Water efficiency on internet	Extra section added at end of section 2.4 explaining the situation and customer engagement strategy
O15	OFWAT - Comment	Board involvement	Clarify the assurance process	Document control has directors initials on it. Board level contact agreed for all regulatory matters	Refer to page 8 for process
R1.1	EA - Recommendation	Drought resilience scenarios	Future drought scenarios not communicated	Link to DMP EA 1.1 commentary table	Refer to section 2.4
R1.1	EA - Recommendation	Drought history	Only for last 15 years	We only have borehole data back to 1998 but rainfall to the beginning of 1900's. Linked rainfall deficit with impact on borehole level and then predicted probability	Refer to section 2.4
R1.1	EA - Recommendation	No link to DMP	Need to add the links to the DMP	Refer to DMP EA *.* where *.* is the item to be linked to in	Refer to section 2.4
R1.1	EA - Recommendation	1 in 200 drought and impact	Need to plan for droughts greater than 1 in 200 year	Refer to DMP EA 4.1	Refer to section 2.4
R1.1	EA - Recommendation	Evidence of borehole levels	Draw down on borehole levels	Refer to DMA EA 2.2 and DMP EA 4.1	Refer to section 2.4
R1.2	EA - Recommendation	Levels of Service table	Levels of service based on only last 15 years of data	Network didn't exist prior to then, however refer to WRMP O3 for how this can be improved	
R1.3	EA - Recommendation	Nitrate levels	No plan to guard catchment area	Refer to WRMP O13	
R1.4	EA - Recommendation	Freeze / Thaw resilience	If no risk then needs to be mentioned in the plan	Valid point, criticality of assets needs to be considered in general as part of SEMD. Evidence from looking at demand v temperature historically	Refer to new section 2.10
R1.5	EA - Recommendation	GAC bypass option	Pesticide levels need to be fully addressed under different conditions	Note that this is an emergency activity as an option to meet drought conditions without backing off Leckford Bridge. Can be a permanent solution but need evidence that pesticides no longer an issue	Refer to comments in section 2.5
R1.6	EA - Recommendation	Atrazine and Desethyl Atrazine graph	No explanation as to why it is getting better	Need to guard against a sudden increase. Proposal is not to remove treatment, rather have option to bypass should the need arise and water quality is okay	Refer to comments in section 2.5
R1.7	EA - Recommendation	Reference needed to DWI guidance on drinking water protected areas	Guidance needs to be reviewed and referenced	There are no drinking water protected areas	Refer to section 2.9
R1.8	EA - Recommendation	Catchment risk mitigation	Mitigate against contamination of ground water table	Catchment area has been identified and checked for sites within that area that may pose a risk of contamination	Refer to section 2.5 for reivew of upstream pesticide risks
R2.1	EA - Recommendation	Leakage	Leakage does not reduce during the plan	Assumed a worst case situation of 1.47 Ml/d compared to Sustainable Economic Level of Leakage of 1.2 Ml/d. Current level at 0.5 Ml/d	Refer to section 3.4

R2.1	EA - Recommendation	Leakage	Operational unaccounted for water after 2021	Can calculate the operational use given current work on main laying. There will be a stabilisation of mains replacement over the planning period. Can improve operational loss predictions in the future	Refer to section 3.4
R2.2	EA - Recommendation	Leakage	Method of calculation	Use of Netbase (commercially available software) is in line with best practice	Refer to start of section 3.4
R2.3	EA - Recommendation	Leakage	Customer supply pipe leakage	At the moment this is not separated as part of supply / demand balance, it is included in overall leakage because there are only a small number of property connections and the situation is complicated by connections to military barracks	Refer to section 3.4
R2.4	EA - Recommendation	Leakage	Leakage management options	Automated meter reading is in place. Daily supply / demand balance with weekly reporting on leakage to improve management. Pressure management options have been considered to allow increase of pressure reducing valve settings in the case of a fire. In planning tables have assumed worst case, leakage remains above economic level	Refer to section 3.4
R2.5	EA - Recommendation	Leakage	15% reduction challenge by OFWAT	Again, level of leakage in planning table assumed worst case scenario.	Refer to end of section 3.4
R2.6	EA - Recommendation	Leakage	Methodology reporting consistency	Netbase provides a consistent and best practice approach as is commercially available software. Method has been documented in internal procedure on Local Management System	Refer to section 3.4
R2.6	EA - Recommendation	Leakage	Methodology impact on SELL	In line with WRc methodology and water industry best practice	Refer to section 3.4
R3.1	EA - Recommendation	Planning horizon	Consistent planning period	This is because original plan was updated so some text may have said 2017 to 2040, when should read 2020 to 2045. Refer to WRMP O2	Corrected throughout document
R3.2	EA - Recommendation	Probability of Restrictions	Water usage restrictions should be based upon future predicted performance not past results	Refer to row 13 DMP. EA are willing to help find more rainfall data and borehole data to allow future restrictions frequency to be determined. Re: WRMP O3	Refer to section 2.4
R3.3	EA - Recommendation	Reduced restrictions	Indicate how investment reduces risk	Our probability of supply problems is due to a drop in the water table not a problem on the network. Reduction in overall demand could improve water table level and thus reduce the risk, but major impact is rainfall not demand	Refer to section 4.3 on resilience
R3.4	EA - Recommendation	Greenhouse gas emissions	Need to calculate and report current and future emissions	Need to calculate energy, use recent work in relation to Leckford Bridge. The convert to CO2/ML. 0.527 kg CO2 / kWh	Refer to new section 3.6
R3.5	EA - Recommendation	Climate Change	Impact on supply / demand planning tables	Need to determine as a percentage impact on demand as per the 0.6% indicated in the UKWIR report	Refer to section 3.5
R3.6	EA - Recommendation	Metering	Cost of metering	Need to include costs of metering and also consider 100% metering v benefit in reduction in demand	Refer to section 3.3
R3.7	EA - Recommendation	Metering	Meter programme detail	Types of metering and impact. Not necesary due to small numbers involved	Refer to section 3.3
R3.8	EA - Recommendation	Metering	Cost effective	Take R3.6 and R3.7 to determine if 100% metering is cost effective	Refer to section 3.3

R3.9	EA - Recommendation	Timing	Deadline for publication was 1st December	Was submitted end of December and subsequently uploaded for public consultation. Table and updated report delivered on time 10/08/18	