

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
V1	Veolia - Observation	National Environmental and Rural Communities Act 2006 (NERC)	Delivery of the NERC plan needs to be included in the WRMP Project Plan	A Biodiversity Action Plan (BAP) has been produced with a programme of works. The programme of works will be delivered prior to March 2021. Refer to items 24a and b in the Project Plan
D7	DEFRA - Comment 04/11/19	Improvement to Data	The revised draft plan includes statements that the company are working to improve collation, understanding and reporting of data, which is vital to producing robust plans and meeting regulatory expectations and legal requirements. The company should discuss and agree the data required to meet future regulatory expectations. The company have committed to doing this.	This is item 23 in the Project Plan called Power BI development. This will include data mapping in relation to regulatory reporting. This activity is on target for completion before end of 2019. Additional improvements have been identified with the EA for implementation prior to submission of WRMP2024 and these are detailed below and have been added to the Project Plan
D8	DEFRA - Comment 04/11/19	Resilience testing of the network	Improve methodologies for deployable output, forecasting and resilience testing of its supply network. The demand forecast methodology, especially with regard to the military demand uncertainty and associated reporting, should be developed further for WRMP24	Resilience testing is item 20 in the Project Plan. Demand projections will be refined in time for WRMP24. Current method involves linear growth, which is a worst case approach. A more realistic demand forecast will be developed. Ties in with EA Demand projections improvement.
D9	DEFRA - Comment 04/11/19	Refine deployable output and drought resilience	Continue to refine its deployable output and drought resilience assessment as part of its drought plan revision in 2020, and report on progress of this through the annual review of its WRMP	This is item 11 in the Project Plan and development will be included in the WRMP annual review. Item 11a added to the Project Plan to indicate the annual review
D10	DEFRA - Comment 04/11/19	Leckford Bridge agreement with Wessex Water	Continue to work with Wessex Water to agree the long-term arrangement of its existing transfer at Leckford Bridge, whilst simultaneously investigating alternative options to increase supplies and/or manage demand later in the planning period	These are listed items 18 and 19 on the Project Plan, agreement due end of 2020. Options for enhancing security of supply is also under consideration (item 16a). This forms part of the Security Emergency Measures Directive (SEMD) options.

D11	DEFRA - Comment 04/11/19	Commitment to DN1 to DN7 and programme of implementation	Include a commitment and project plan in the final WRMP to provide assurance that the work mentioned here will be completed in time to inform its next WRMP. If this work results in a significant loss of supplies that adversely affects its supply - demand balance, the company should review WRMP ahead of its next WRMP	Refer to the updated Project Plan with relevant sub-tasks added
D12	DEFRA - Comment 04/11/19	Work with EA and regulators to confirm reporting requirements	Continue to work with the Environment Agency and regulators to understand what is required, by when and to what standard to aid the company with planning and preparedness for reporting	Refer to items I1 to I12 - work will continue and Project Plan will be modified to reflect the improvements and associated work
D13	DEFRA - Comment 04/11/19	Customer engagement improvement	Improve its customer engagement for WRMP24	This activity will include communication regarding water saving hints and tips and environmental improvements.
I1	EA - Improvement 16/10/19	Data	The data returns provided by VWP are not fully compliant. i.e. there are omissions or differences in the way data is reported to the structure requested. This makes the auditing process more complicated and difficult to compare company performance in a consistent manner	Included as item 15a in the project plan. New reporting structure provided by the EA and will be used during the next WRMP annual report. This is now included as item 13a on the Project Plan
I2	EA - Improvement 16/10/20	MoD demand	VWP report unmeasured non-household consumption to be 3.26 Ml/d which is 52% higher than for WRMP14. This is also higher than the 2.88 Ml/d predicted in WRMP19. This is not considered to be a supply / demand balance risk, but VWP could do more to show understanding of the full extent of growth in the area as MoD is higher than forecast	The WRMP annual commentary will be more descriptive. This is included as item 15b on the Project Plan. There is some confusion at the moment regarding metered accounts at the Corunna estate development. Some are incorrectly allocated to MoD ownership so this will result in MoD demand being higher than forecast and domestic demand being lower than forecast. Work is ongoing to correct this error.
I3	EA - Improvement 16/10/21	Housing development	Housing development is not on track with the WRMP14 forecasts, but is more in line with WRMP19. This is presentational and a data accuracy issue and doesn't pose a major risk to the company supply / demand balance	The WRMP annual commentary will be more descriptive. This is included as item 15c. on the Project Plan. There is some confusion at the moment regarding metered accounts at the Corunna estate development. Some are incorrectly allocated to MoD ownership so this will result in MoD demand being higher than forecast and domestic demand being lower than forecast. Work is ongoing to correct this error.
I4	EA - Improvement 16/10/22	Average PCC	The PCC is 6% higher than the base line for 2019. VWP did not state it experienced a dry year, so the rise in average PCC beyond expected levels in WRMP19 could be better explained in the commentary to understand the contributing factors. Demand across the network should be monitored closely to identify if there is an upward trend in consumption	The WRMP annual commentary will be more descriptive. This is included as item 15d. on the Project Plan. A more accurate PCC will be calculated once the housing developments have been completely delivered with meters and connection points correctly assigned
I5	EA - Statement of Response Review	Planning table data improvements	The planning tables have been improved but there is further work to ensure they are reporting the correct data and follow the planning table guidance	Refer to item I1 - work ongoing to improve. Refer to Project Plan, item 23a where specific work is proceeding to map data required for regulatory reporting purposes as part of the Power BI project.

I6	EA - Statement of Response Review	Water Industry National Environment Programme (WINEP)	The WINEP investigations have been included in the plan, but there isn't any scenario testing to show what (if any) the potential reduction in abstraction licence could be and what impact that could have to VWP. The revised draft plan states the impact is predicted to be minor but this could be proven with further evidence	Refer to item 7a in the Project Plan. The groundwater modelling will include scenarios and these have been agreed with the contractor performing the analysis for the Salisbury Plain
I7	EA - Statement of Response Review	Demand Projections	OFWATs representation questioned how the demand projections had been calculated and whether they follow the planning guidance. The plan still lacks methodology and justification for the demand projections. Details in Appendix 5 could be expanded to make it clearer to understand and explicitly state that planning guidelines have been followed	WRMP24 will include reference to the the demand planning guidelines. By 2024 the network should have settled down with Army Basing and new developments being completed. Item added to Project Plan as item 15e
I8	EA - Statement of Response Review	Climate change methodology	In the plan the compant states that they are awaiting confirmation that the approach to calculating climate impacts follows the guidelines before they continue to consider the impact. The company need to proactively engage on this issue and ensure the methodology is correct and complete impact of climate change has been considered.	Confirm method of AECOM aligns with EA approved method. Added as item 12a to the Project Plan
I9	EA - Statement of Response Review	Per Capita Consumption (PCC)	USPL has been included in the PCC calculation, this is incorrect. Planning tables need to be updated	Refer to item 15d in the Project Plan. Confirm that calculation of PCC is correct
I10	EA - Statement of Response Review	User Supply Pipe Leakage (USPL)	USPL is now included in the planning tables, but the company haven't mentioned if there is a policy for repairs on customer supply pipes, as requested in the original representation	Refer to item 15d in the Project Plan. Confirm that calculation of USPL is correct
I11	EA - Statement of Response Review	Catchment Management	Catchment management has been explored further since the draft plan with a desk top study, but there is no catchment management plan to protect water quality from pesticides and nitrates in particular, in the long term	Refer to item 16a in the Project Plan. This will follow on from the Security Emergency Management Directive (SEMD) assessment
I12	EA - Statement of Response Review	Asset renewal - risk of widespread leakage	The mains are all of similar age and although relatively new, the plan mentions it would be useful to have an age profile of mains due to the risk that the asset lifespan will be similar and could be very costly to repair / renew at once. It is unclear if this work is being undertaken and whether there is a long term plan to address sudden need to replace mains assets	Refer to item 16d in the Project Plan. This will follow on from modelling work (item 21 in the Project Plan)
D1	DEFRA - Comment	Leckford Bridge	Clarify transfer arrangement with Wessex Water on the Leckford Bridge transfer and demonstrate security of supply	Refer to Appendix 5, end of section 1.7 - to be agreed at Corporate level by end of 2020. 2.74 Ml/d transfer included in a 'LB 2.74 Table' as evidence of security of supply, options included in the plan. Emergency cross connection being considered as part of SEMD strategy. Refer also to section 8 and 9 of Appendix 5. The main report has been updated to reflect this in numerous sections such as Appendix 8 - Implementation Plan

D2	DEFRA - Comment	Deployable Output and Drought	Review deployable output and drought resilience approach and provide assurance of VWP reported level of service	New supply / demand table 'LB 2.74 Table' produced that shows possible supply / demand imbalance in 2041. Refer to Appendix 5 section 1.3 for resilience of supply which includes assessment of sources prior to 2024 WRMP which considers impact on environment, water quality and network. Such an enhancement and the SEMD enhancements will assist in reducing the impact of more extreme events. During the plan creation Wessex and Veolia communicated to ensure a consistent approach in relation to Leckford Bridge and Drought probability. Non-essential business use relates to the MoD and they would be asked to either reduce use for military vehicle cleaning or relocate military units to other barracks in an extreme event - refer to Appendix 2 section 2.2 and section 10.2. The Drought Management Plan (DMP) is due for major update at the end of 2020 and classification of drought zones and probability will be further addressed as part of that activity. The probability is now different to Wessex due to the interaction between the MoD and the rest of the regulated network (the plan has been updated to reflect this)
D3	DEFRA - Comment	WRMP Direction Compliance	3 (b) VWP must state how planned annual risk of demand restrictions will change over the planning period	No change over the planning period. Refer to section 2.4 of the main report.
D4	DEFRA - Comment	WRMP Direction Compliance	3 (c) VWP needs to state assumptions and methodology used to estimate planned annual risk of drought	Refer to Appendix 2 section 2.2. Probability has been based on a combination of historic and future predictions based upon climate change modelling (Appendix 3). The probability of an actual hosepipe ban will be reduced by close cooperation between the MoD and VWP as part of reduction of non essential business use. The classification of drought and probability will be addressed as part of the Drought Management Plan delivery due end of 2020. This will allow the impact of mitigation from such close cooperation to be assessed and probability of drought classifications can then be recalculated
D5	DEFRA - Comment	WRMP Direction Compliance	3 (e) Clarify whether VWP is anticipating an impact from climate change on its operations (supply and demand). State assumptions	No impact expected. Added at end of section 2.7 main report
D6	DEFRA - Comment	WRMP Direction Compliance	3 (h) Include a clear assessment of the cost effectiveness of each metering strategy (selective, change of occupancy, optant)	Refer to Appendix 4 Section 3. The cost would be in excess of 200,000 GBP with a benefit of 0.05 Ml/d no matter the meter replacement strategy followed (selective, change of occupancy or opt-in). The unmetered properties that remain face onto the pavement or road and the only way a meter could be installed is if the service pipe was rerouted. Therefore installation of meters at the existing unmetered properties is not cost effective at this time. If a major supply / demand capital project was required then this would be revisited
O1	OFWAT - Comment	Supporting Documentation	Needs to be clearer reference to supporting documentation	Refer to WRMP Contents document that now lists all supporting documentation
O2	OFWAT - Comment	2017 - 2040 v 2020 - 2045	Consistent planning period	All references now are up to 2045 with short term focus up to 2025
O3	OFWAT - Comment	Levels of Service table	Water usage restrictions should be based upon future predicted performance not past results	Included in WRMP Section 2.4, Appendix 2 Section 2.2, Appendix 5 Section 1.4 and WISER Report Section 2.2. Climate change modelling has been used together with historic information to determine probabilities and impact
O4	OFWAT - Comment	Customer participation	Need evidence of engagement with the local domestic customers	Included in WRMP Section 5.1.2 and Appendix 4. Customer engagement project has commenced and is due for completion end of 2019
O5	OFWAT - Comment	Planning Tables	Inconsistencies in narrative	Refer to WRMP Section 4 and Appendix 5. Planning table updated to reflect realistic demand growth to 2045
O6	OFWAT - Comment	PCC	Too high in planning tables. Military personnel?	WRMP Section 3.3, Appendix 4 Section 3 and Appendix 5 Section 2.2. PCC corrected in the Planning Table and is now realistic
O7	OFWAT - Comment	MoD Use	Uncertainty due to missing flow data	MoD connections are metered with AMR but are not billed on volume, instead billed on overall contract performance. Refer to Appendix 5 Section 2.1
O8	OFWAT - Comment	Leakage	How is this calculated?	Refer to Appendix 9

O9	OFWAT - Comment	Climate Change	Will this impact on deployable output?	Refer to WRMP Section 2.7 and Appendix 3
O10	OFWAT - Comment	Outage / headroom	Non-drought resilience - more detail required	WRMP Section 4.3 and Appendix 2
O11	OFWAT - Comment	Leckford Bridge	Wessex Water under drought conditions	WRMP Section 2.3, Appendix 4 Section 2.5 and Appendix 5 Section 1.6
O12	OFWAT - Comment	Outage / headroom	Planning tables and headroom	WRMP Sections 2.6 and 4.1. Appendix 2 Sections 9.1 and 9.2. Included in the Planning Table
O13	OFWAT - Comment	Quality of borehole water	Collect further data and investigate the catchment area	Appendix 2 Section 4
O14	OFWAT - Comment	Water efficiency schemes	Assess benefits and customer participation	WRMP Section 5.1.2 and Appendix 4
O15	OFWAT - Comment	Board involvement	Clarify the assurance process	Appendix 8
R1.1	EA - Recommendation	Drought resilience scenarios	Future drought scenarios not communicated	WRMP Section 2.4, Appendix 2 Section 2 and Section 10.2. Appendix 8 references the Drought Management Plan
R1.1	EA - Recommendation	Drought history	Only for last 15 years	Have data from 1920 and climate change predictions to 2091. Refer to WRMP Section 2.4, Appendix 2 Section 2 and 10.2 Appendix 3 indicates Climate Change Methodology
R1.1	EA - Recommendation	No link to DMP	Need to add the links to the DMP	Link in Appendix 8 Implementation of the Plan
R1.1	EA - Recommendation	1 in 200 drought and impact	Need to plan for droughts greater than 1 in 200 year event	Have data from 1920 and climate change predictions to 2091. Refer to WRMP Section 2.4, Appendix 2 Section 2 and 10.2 Appendix 3 indicates Climate Change Methodology
R1.1	EA - Recommendation	Evidence of borehole levels	Draw down on borehole levels	WRMP Section 2.4 and Appendix 2 Section 1
R1.2	EA - Recommendation	Levels of Service table	Levels of service based on only last 15 years of data	Included in WRMP Section 2.4, Appendix 2 Section 2.2, Appendix 5 Section 1.4 and WISER Report Section 2.2. Climate change modelling has been used together with historic information to determine probabilities and impact
R1.3	EA - Recommendation	Nitrate levels	No plan to guard catchment area	Appendix 2 Section 4.1
R1.4	EA - Recommendation	Freeze / Thaw resilience	If no risk then needs to be mentioned in the plan	WRMP 2.10, Appendix 2 Section 5
R1.5	EA - Recommendation	GAC bypass option	Pesticide levels need to be fully addressed under different conditions	Not an option. Refer to WRMP Section 2.5 and Appendix 2 Section 4
R1.6	EA - Recommendation	Atrazine and Desethyl Atrazine graph	No explanation as to why it is getting better	Refer to WRMP Section 2.5 and Appendix 2 Section 4
R1.7	EA - Recommendation	Reference needed to DWI guidance on drinking water protected areas	Guidance needs to be reviewed and referenced	WRMP Section 2.5 - There are no Drinking Water Protected Areas
R1.8	EA - Recommendation	Catchment risk mitigation	Mitigate against contamination of ground water table	Refer to WRMP Section 2.5 and Appendix 2 Section 4
R2.1	EA - Recommendation	Leakage	Leakage does not reduce during the plan	Refer to WRMP Sections 3.4 and 5.1.1, also Appendix 1, Appendix 5 Section 4 and Appendix 6 Section 3
R2.1	EA - Recommendation	Leakage	Operational unaccounted for water after 2021	Appendix 1 Section 5 included in Planning Table

R2.2	EA - Recommendation	Leakage	Method of calculation	Refer to Appendix 9
R2.3	EA - Recommendation	Leakage	Customer supply pipe leakage	Appendix 1 Section 6
R2.4	EA - Recommendation	Leakage	Leakage management options	WRMP Section 5.1.1 and Appendix 1 Section 7
R2.5	EA - Recommendation	Leakage	15% reduction challenge by OFWAT	WRMP Section 5.1.1 and Appendix 1 Section 7
R2.6	EA - Recommendation	Leakage	Methodology reporting consistency	Appendix 9
R2.6	EA - Recommendation	Leakage	Methodology impact on SELL	15% by 2025 and 50% challenge by 2050 are drivers. SELL no longer used. Reer to WRMP Section 5.1.1 and Appendix 1 Section 7
R3.1	EA - Recommendation	Planning horizon	Consistent planning period	All references now are up to 2045 with short term focus up to 2025
R3.2	EA - Recommendation	Probability of Restrictions	Water usage restrictions should be based upon future predicted performance not past results	Refer to WRMP Section 2.7 and Appendix 3
R3.3	EA - Recommendation	Reduced restrictions	Indicate how investment reduces risk	WRMP Section 5, Appendix 1 Section 7, Appendix 2 Section 10, Appendix 4 Section 3 and Appendix 6. Plan of Action lists all WRMP improvements
R3.4	EA - Recommendation	Greenhouse gas emissions	Need to calculate and report current and future emissions	WRMP Section 3.6
R3.5	EA - Recommendation	Climate Change	Impact on supply / demand planning tables	WRMP Section 3.5, Appendix 3 and Appendix 5 Section 5. Growth included in the Planning Table
R3.6	EA - Recommendation	Metering	Cost of metering	WRMP Section 5.1.2 and Appendix 4
R3.7	EA - Recommendation	Metering	Meter programme detail	WRMP Section 5.1.2 and Appendix 4
R3.8	EA - Recommendation	Metering	Cost effective	WRMP Section 5.1.2 and Appendix 4
R3.9	EA - Recommendation	Timing	Deadline for publication was 1st December	New deadline of 31/01/19. Submitted on 30/01/19 so back on track in terms of timing
I1.1	EA - Improvement	WINEP	Reference WINEP in WRMP	Appendix 7 Section 1
I1.1	EA - Improvement	WINEP	Winterbourne and River Bourne	Corrected
I2.1	EA - Improvement	UKWIR	UKWIR Methodologies not referenced	WRMP Section 1.2
I2.2	EA - Improvement	Deployable Output	What restricts our output?	WRMP Section 2.5 Appendix 2 Sections 4.1 to 4.4
I2.2	EA - Improvement	Chalk Pit	Is this capped at 2 MI/d	No. Refer to WRMP Section 2.5 Appendix 2 Sections 4.1 to 4.4
I2.3	EA - Improvement	BH2 and BH3	GAC, does this limit output	No. Refer to WRMP Section 2.5 Appendix 2 Sections 4.1 to 4.4
I3.1	EA - Improvement	UKWIR Assessment concerning outage	Monte Carlo analysis method and source of data. Audit trail of outages	WRMP Sections 2.6 and 4.1. Appendix 2 Sections 9.1 and 9.2. Included in the Planning Table
I4.1	EA - Improvement	Bulk supply between VWP and Wessex	Wording of agreement is not clear and future demand scenarios	Appendix 5 Section 5.1
I4.2	EA - Improvement	Bulk supply between VWP and Wessex	Agreement between Wessex and VWP about future of the connection.	Appendix 5 Section 5.2
I4.3	EA - Improvement	Description and Table inconsistencies	Description needs to agree with data displayed	Corrected
I4.3	EA - Improvement	PCC	Military usage linked to PCC for soldiers	Appendix 5 Section 2.1
MI1	EA - Minor Issue	Strategic Environmental Assessment	No evidence that this was considered	WISER Attached to the WRMP Report for completeness
MI2	EA - Minor Issue	Impact of reducing leakage	Consider positive impact to the environment from pressure management	WRMP Section 5.1.1 and Appendix 1 Section 7.3

MI3	EA - Minor Issue	Option Information	No timings or trigger points	WRMP Section 5.2 and Appendix 8 Implementation Plan
MI4	EA - Minor Issue	Catchment risk mitigation	Long terms risks of pollution need to be considered	Refer to R1.8
MI5	EA - Minor Issue	Naming convention	Winterbourne and River Bourne	Corrected
MI6	EA - Minor Issue	Housing Developments	Not sure if this is total new developments or developments per annum	Appendix 5 Section 5.2
MI7	EA - Minor Issue	Planning Tables	DYAA baseline v future new developments	Planning Table updated. Refer to Appendix 5 for details
MI8	EA - Minor Issue	Planning Tables	Baseline v final plan are the same	Planning Table updated. Refer to Appendix 5 for details
MI9	EA - Minor Issue	Planning Tables	DYCP v DYAA	Planning Table updated. Refer to Appendix 5 for details
MI10	EA - Minor Issue	Planning Tables	Population figures need adding	Planning Table updated. Refer to Appendix 5 for details
MI11	EA - Minor Issue	Planning Tables	Occupancy rates	Planning Table updated. Refer to Appendix 5 for details
MI12	EA - Minor Issue	Planning Tables	FP Demand in DYAA and DYCP	Planning Table updated. Refer to Appendix 5 for details
MI13	EA - Minor Issue	Planning Tables	Raw water operational losses	Appendix 5 Section 1
MI14	EA - Minor Issue	Planning Tables	Table 10 and different drought scenarios	Planning Table updated. Refer to Appendix 5 for details
MI15	EA - Minor Issue	Section 2.6: Monte Carlo	Error in the table	Corrected. Ref to Appandix 2 Section 9.1
MI16	EA - Minor Issue	DYCP	Is this a drought scenario?	Planning Table updated. Refer to Appendix 5 for details
MI17	EA - Minor Issue	Outage Assessment	Table 2 - 10BL explanation required linking to the monte-carlo analysis	Planning Table updated. Refer to Appendix 5 for details
MI18	EA - Minor Issue	Abstraction Reform	Needs referencing in WRMP	Refer to WRMP Section 2.5
MI19	EA - Minor Issue	Planning Tables	Climate change impact on demand	Appendix 3 and Appendix 5 Section 5
MI20	EA - Minor Issue	Climate Change	Reference climate change methodology	Refer to Appendix 3
MI21	EA - Minor Issue	Unconstrained list	No unconstrained options list presented	Refer to Appendix 8 Section 3.1
MI22	EA - Minor Issue	Customer participation	Need evidence of engagement with the local domestic customers	Appendix 4 Section 2
MI23	EA - Minor Issue	Future Inset Areas	Need to state if VWP plans to increase areas supplied	WRMP Section 2.2