

South Staffs Water

Draft Drought Plan 2016

Statement of Response

Introduction

South Staffs Water has prepared a revised draft drought plan for its South Staffs region in accordance with the requirements of the Water Industry act 1991 (as amended 2003), the Drought Plan Regulations 2005, the Flood & Water Management Act 2010 and the Drought Plan Direction 2016. The plan has been prepared with the Environment Agency's Drought Plan Guidance, 2015 and identifies drought management triggers, measures and communications that we will employ in the event of a drought.

The Secretary of State confirmed that we publish and consult on our plan on 3 April 2017, and the consultation period commenced on 11 August 2017 and ran for a period of 6 weeks until the 6 October 2017

Consultation on the Plan

In accordance with the statutory process we engaged with statutory consultees prior to producing our draft plan, in order to seek views on the revised plan. As part of our pre consultation we received comments from the Environment Agency, the independent customer panel for our region, and engaged extensively with CCWater on the presentation of our non-technical summary to support the plan. We thank all the stakeholders and other interested parties that have provided comments in the development of this plan.

Following publication of the draft plan to the wider stakeholder group, we received responses from a range of stakeholders:

Environment Agency	CCWater
Historic England	Customer panel
Canal and Rivers	Trust
EDF	

We have carefully considered all the representations and, where appropriate, have amended the plan as explained in the table at the end of this document.

Overview of comments

We received a number of supportive comments commending us on the detail contained in the plan and also the accessibility of the non-technical summary.

The majority of the detailed technical comments were raised by the Environment Agency and fall into three categories

- Testing our plan against drought scenarios
- Mitigation measures
- Permit and drought order readiness

We have discussed these comments in detail with the Environment Agency to better understand the specific points raised.

Overview of changes for the final Drought Plan

In reviewing the responses received there are a number of improvements included in the revised final Drought Plan, and we have committed to undertake further on-going supporting work following publication.

In many cases a change to the plan is not necessary. However, we have made a number of minor wording changes and additions to the plan to improve understanding and have amended or improved a number of figures.

The most significant outcomes from the consultation are:

- We will prepare and publish additional material relating to our proposed drought permits and orders to demonstrate that they are “permit ready”.
- We will extend our monitoring and mitigation plans so that detail for our groundwater sources under investigation are included

We will add these documents to our plan in the next 3 months.

We have identified a number of areas for review and consideration in any future drought plan revisions. These include:

- Issues arising from the forthcoming final design and implementation of schemes within the current National Environment Programme
- Issues arising from the forthcoming WINEP investigations to prevent further deterioration in environment
- Issues arising from any refinements of our operational management of Blithfield Reservoir

We will review our plan on an annual basis and agree with the Environment Agency any changes to our monitoring and mitigation plans.

With amendments in place, we believe that our Drought Plan is fully compliant with the latest guidance and meets the requirements of the Water Industry Act 1991 (as amended 2003), the Flood & Water Management Act 2010, and the Drought Plan Direction 2016.

Environment Agency

EA- DIRECTION COMPLIANCE

Direction not complied with	Recommended changes to ensure compliance with Direction	Company Response	Change to plan
(b) the magnitude and duration of droughts for which the drought plan has been tested	Linked to recommendation 1, the company has not included sufficient detail about the magnitude and duration of the droughts for which it has been tested. The company should include further details of the duration and rainfall deficits it has used in its scenarios. (see Appendix 1, Issue 1.1)	See response to Recommendation 1 and Issue 1.1 below for more detail	We have made amendments to Section 4 of the plan to include additional statistics
(e) the measures that may be needed to mitigate any adverse effect on the environment resulting from the implementation of a drought management measure	Linked to recommendation 2, the company has not provided sufficient detail to demonstrate that it will effectively mitigate environmental impacts in a drought. The company must include further detail in its approach to mitigation, including detail on the actions, sites, timings and links to its monitoring plan. (see Appendix 1, Issue 2.1)	See response to Recommendation 2 and Issue 2.1 below for more detail	We have made amendments to our environmental assessment report for the River Blithe and River Trent Drought Permit and have provided revised copies to the Agency. Relevant changes are included within the main report and appendices.
(f) the permits and approvals that the water undertaker expects to need in order to implement those mitigation measures;	Linked to recommendation 2, The company has not set out enough detail on its mitigation actions and it is not clear whether additional permits and approvals are needed. Once it has improved its mitigation plan, we recommend that the company includes information on any permits or approvals that it needs to implement mitigation measures. (related to appendix 1, issue 2.2)	See response to Recommendation 2 and Issue 2.2 below for more detail	A further appendix D1 summarising all permits /approvals associated mitigation measures In addition to those for measures (as per Appendix C and D) has been added to the plan.

EA - RECOMMENDATIONS

Recommendation 1 – Improve Drought Scenarios and Triggers

Area of issue	Issue and evidence	Implications	Information or changes required	Company Response	Change to plan
Issue 1.1 Details of the duration and rainfall deficits of the scenarios used	The draft drought plan lacks sufficient details of the duration and rainfall deficits used in the four drought scenarios the company have used.	Linked to direction 3 (b) The magnitude and duration of droughts for which the drought plan has been tested. The draft plan should demonstrate the range of droughts under which the company can maintain security of supply without using emergency measures.	The company should include details of the duration and rainfall deficits of the scenarios used.	Section 4 of the plan covers resilience against single year, two year and five year droughts and also scenarios where historic droughts suffer reduced rainfall equivalent to 1 in 200 year events. However we recognise specific statistics in relation to these scenarios such as rainfall deficits or percentage long term average rainfall are not stated for each scenario and we are happy to provide this additional detail.	Amendments to Section 4 have been made to include additional statistics
Issue 1.2 Blithfield drought monitoring curve and TuBs trigger	From EA observation Blithfield reservoir has dropped below trigger on a number of times since 2013. We are not aware of any actions being taken as detailed in the drought plan. The first action triggered in the drought plan is to discuss with the EA and we do not feel this has happened. As the trigger has been met a number of times over the past few years, this raises concerns that the drought curve is inaccurate. On page 41 the trigger for ending a drought for Blithfield is 10% above trigger 1. The company have not provided evidence this is a true representation of the reservoir returning to normal conditions.	The company might not be using an appropriate trigger on Blithfield (we are referring to trigger one) to start implementing drought management actions and marking the end of drought. The company could be triggering actions too early or late, putting security of supply at risk.	The company should review the drought curve and ensure it is fit for purpose, and is appropriately triggering drought actions at the start and end of a drought. The company should test the drought curve against conditions since 2013.	Trigger curve 1 is for drought monitoring. The drought monitoring zone is very broad with a range of possible actions to be taken with the specific actions being agreed on in relation to the circumstances at the time. Management of the level in Blithfield during the early part of the drought monitoring zone is a business as usual activity for us and as the EA observe some kind of action has been taken most years in recent years. This has in some cases been driven by the need to accommodate outages at other sites for essential planned work. Internally we have been trialling an alternative operational curve over the last few years to test whether this represents operational circumstances better. Alongside this we intend to undertake a review of all the drought curves during 2018/19. We will share this work with the Environment Agency and will update the Drought Plan accordingly if required.	None

Recommendation 2 – Improve environmental assessment, monitoring and mitigation

Area of issue	Issue and evidence	Implications	Information or changes required	Company Response	Change to plan
Issue 2.1 – mitigation	Table 7 of the plan indicates mitigation will be required against Zebra mussels, but in section 8.7 the plan does not provide details of the mitigation that will be carried out.	There is potential risk to the environment if the company does not plan to mitigate against the spread of invasive non-native species where it is required to do so.	The company should provide the details of how it will mitigate all features it has identified as requiring mitigation for its River Blithe and River Trent drought permit.	We have reviewed and clarified risks of the spread of Invasive non native species associated with our River Blithe and River Trent drought permit. Operation of the drought permit does not cause any increase in risk. However we recognise that maintenance associated with normal and drought operation of the site does present a risk and have accordingly listed appropriate mitigation actions.	We have made amendments to our environmental assessment report for the River Blithe and River Trent Drought Permit and have provided revised copies to the Agency. Relevant changes are included within the main report and appendices.
Issue 2.2 – mitigation and associated permits	<p>Direction 3 (f)</p> <p>The draft plan does not include information on the permits and approvals that the water undertaker expects to need in order to implement mitigation measures.</p> <p>Section 8.7 details the mitigation actions but no information is provided on the necessary permit and/ or approvals required to carry out those actions.</p>	If mitigation measures are delayed due to other permit/ approval requirements then the drought supply action may have greater environmental impact. It also may delay the drought permit approval process.	We recommend that the company amends the plan to include: Information on what, if any, permit/ approvals are required to implement the mitigation measures.	<p>Description of permits approvals are contained within the EARs for drought permits e.g. Section 7.3.1 of River Severn EAR :</p> <p>“Where these measures involve work within or adjacent to the river channel, additional approvals will be required (e.g. a Land Drainage Consent) and there will be a need to work closely with other stakeholders (landowners, local authorities and the EA). Measures to reduce abstraction will not require further approval.”</p> <p>Mitigation measures listed in our plan are all associated with a published EAR which has been shared with the Agency.</p>	A further appendix D1 summarising all permits /approvals associated mitigation measures In addition to those for measures (as per Appendix C and D) has been added to the plan.

Recommendation 3 – Clarity on application of drought triggers

Area of issue	Issue and evidence	Implications	Information or changes required	Company Response	Change to plan
Issue 3.1 – Clarity on phasing of TUBS and drought permits	Figure 12 appears to show that the company would apply for drought permits (trigger 2 action 8) before TUBs (trigger 3 action 9) whereas the narrative (see page 40 and page 36) suggests that the company would apply for drought permits 2 days after implementing TUBs.	Lack of clarity in the plan may lead to incorrect application of drought actions during drought and mismanagement as a result.	The company should clarify figures 11 and 12 or the text in the plan so they are consistent with each other.	We agree that the figure label can be clearer in this case. The text preceding Figure 12 states “As the Apply for Drought Permit curve is further approached the Company will begin preparations for making an application for a drought permit. If conditions continue to deteriorate the Company will make appeals for customers to reduce demand and consider imposing a temporary use ban at this point.”	We have changed the figure label from “Apply for Company drought permits” to “Prepare for restrictions and drought permits”
Issue 3.2 – phasing of TUBS and drought permits	<p>It is not clear why the company is choosing to apply for a drought permit only 2 days after implementation of a TUB (or if figure 12 is correct before). In this case the drought permit would be to abstract from the Trent and Blithe after the HoF has been applied to protect other water users and the environment.</p> <p>The Water Industry Act 1991 defines Drought Plans as ‘a plan for how the water undertaker will continue, during a period of drought, [...] with as little recourse as reasonably possible to drought orders or drought permits’. Where reasonably possible TUBs are a tool that can be used to delay or prevent use of drought permits.</p>	Unclear if TUBs are being used effectively to prevent environmental impact and impact on other river users.	The company should clearly set out its justification for not allowing longer for the benefits of TUBs to reduce, postpone or prevent use of this drought permit.	We agree that in the case that a temporary use (hosepipe) ban (TUB) is implemented it is important to take into account the benefits of this measure in the case for overriding environmental protections for any of our abstractions. We would anticipate that the impacts of a TUB would be seen extremely quickly such that the Agency as regulator and consultee on any application would have sufficient understanding of this in determining its support or otherwise of our application.	We have not changed our plan but will highlight this issue in preparation of our material to show that we are “permit ready”

EA - IMPROVEMENTS					
Area of issue	Issue and evidence	Implication	Recommended improvement	Company Response	Change to plan
Issue 3.1 – Permit and Order ready	The company does not prepare (as much as possible), a case for the ‘exceptional shortage of rain’. The plan does not provide a plan or programme to show how it will do the necessary work to complete the drought order application.	<p>Potential to cause a delay in the application process. Without adequate information applications for drought orders may be delayed or rejected.</p> <p>This could put public supplies at risk of failure or the environment at risk of unnecessary damage.</p>	The company should provide details for: The case for the ‘exceptional shortage of rain’, and a plan or programme to show how it will do the necessary work to complete the drought permit and order applications.	<p>We identified key drought triggers for the three key supply systems in the South Staffs region in Section 5 of our plan but accept that these were not sufficiently developed to clearly provide the basis on which we would apply for drought permits and orders citing an exceptional shortage of rain (ESOR). We have been further developing this approach based on study outputs for our WRMP which is being run in parallel to this plan.</p> <p>Our general approach has been to use long term rainfall and flow data from the relevant catchment and to refine tools so that they are sensitive to known historic droughts (1975/76, 2010/11). These will then be used to demonstrate what rainfall sequences represent an ESOR.</p> <p>As indicated in Section 5 of our plan the ESOR case for our groundwater sources and to some extent a NEUB can be made on the basis of analysis (including Tabony tables) of our Company rain gauges which go back as far as 1920.</p> <p>For the Blithfield Reservoir supply system rainfall data is highly variable across the catchment and key rain gauges are outside our supply area and we are yet to secure prompt and regular access to this data. We have therefore developed a cumulative reservoir inflow tool which we have found to provide strong supporting evidence of ESOR and which we can regularly update.</p> <p>For the River Severn supply system the key issues for drought response are rainfall patterns in the Welsh</p>	We will prepare and add an ESOR appendix that details our approach for each supply system and the key rainfall statistics that highlight those droughts that will seriously affect supplies and that require additional supply side measures.

EA - IMPROVEMENTS					
Area of issue	Issue and evidence	Implication	Recommended improvement	Company Response	Change to plan
				Mountains and Shropshire Plains hydrometric areas, which both lie outside our supply area but affect the status of the river regulation on which our source depends. Whilst the EA have not published a ESOR case for their River Severn Order, we anticipate aligning a case built on the rainfall statistics and Tabony Tables presented in Section 3.5 of their December 2013 River Severn Drought Order Environmental Report.	
	<p>Appendices F1, F2, the drought permit and order EARs were submitted late. Because we have not had chance to review these we are unsure if our earlier comments raised in June 2017 for the River Blithe Drought Permit EARs and February 2017 for River Severn EARs, have been incorporated or answered by the company and reflected in the draft plan. In addition we would expect the associated sections of the plan (7.3, 8.5, 8.6, 8.7.2 and 8.7.3) to be revised. Without seeing these finalised EARs we cannot say if the company are permit ready or not.</p>		<p>We would encourage the company to incorporate our earlier comments into its revised environmental assessment reports. The company should continue to work with our Area teams to ensure that it addresses the points we raised on its EARs.</p> <p>We would also expect to see other sections of the revised plan relating to the environmental assessment, monitoring and mitigation to be updated to include these revisions.</p>	<p>We accept that the Environment Agency did not receive final revised copies of the drought permit and order EAR documents in time but believe our Plan is substantially correct in its representation of the impact of these measures and the required monitoring and mitigation plan and contains sufficient safeguards to ensure that these adapt to changing circumstances and understanding.</p> <p>We will continue to work closely with the Environment Agency to conclude signoff for our EARs. We believe we have addressed all concerns raised either directly through the Agency Drought Permit/Order nominated contact or indirectly through other comments raised through this consultation process and have prepared and submitted revised EARs to the Environment Agency.</p>	<p>We have published final EARs so that we are permit ready for the River Blithe/Trent drought permit and River Severn drought order. We have updated the relevant material within our Plan and its Appendices.</p>

EA - IMPROVEMENTS					
Area of issue	Issue and evidence	Implication	Recommended improvement	Company Response	Change to plan
Issue 3.2 - Environmental Monitoring Plan	The detail in the monitoring plan, (section 7) is limited, particularly in the context of groundwater and how the company will use this data to assess the environmental impacts and decide appropriate mitigation measures.	There is a potential risk of deterioration and environmental impacts, if the company cannot show how it will use its monitoring data to identify adequate mitigation measures.	The company should provide the details for how it will use its monitoring plan data to develop appropriate mitigation measures.	<p>Section 5.2.8 details sites where monitoring and mitigation measures are anticipated under our National Environment Programme (NEP) and exactly when and how these are to be triggered, whilst Section 8.8.1 also lists all sites where AMP6 NEP schemes are currently in design phase. At the time of publication (April 2017) WINEP2 (the equivalent for the forthcoming business plan period 2020 -2025) had not been released and further amendments and guidance is not due until March 2018.</p> <p>We understand that the Agency wish to see details of current monitoring published within the plan to provide additional transparency</p>	We will prepare and publish a further Appendix listing the current Site Investigation Programme for each catchment within the current AMP6 NEP, along with any mitigation plans that have been identified as part of the existing study programme. We will also undertake to update this monitoring programme by the end of each financial year to enable refinements to be made (including rationalisation of the current intensive programme) and to incorporate the final WINEP studies in an appropriate way.

EA - IMPROVEMENTS					
Area of issue	Issue and evidence	Implication	Recommended improvement	Company Response	Change to plan
Issue 3.3 – Environmental Monitoring survey data	The plan does not provide sufficient detail of the further survey data that will be needed to complete the environmental assessment. WFD method for fish classification on the R. Severn is not possible. No fish surveys have been planned upstream of the River Severn Works for control site. Inaccuracies in methodologies for the invertebrate sampling, all the sites above Bewdley can be kick sampled. Airlifting only recommended for sites >15m wide and average depth >80cm. Reliant on data from the EA for WQ - large changes in the monitoring programmes within the EA and therefore cannot be guaranteed.	There is a potential risk to the environment as there could be unforeseen impacts on the environment as a result of inappropriate/limited monitoring.	<p>The company should:</p> <p>Identify appropriate methods for fish classification on the R. Severn</p> <p>Plan fish surveys upstream of the River Severn Works for control sites.</p> <p>Amend where necessary the invertebrate sampling methodology in table 10.</p> <p>Liaise with the EA to understand changes to its monitoring programme.</p> <p>Where there are gaps in monitoring (from changes to EA monitoring or otherwise identified) the company should undertake this monitoring.</p>	<p>In their consultation response the Agency have provided additional detail of their monitoring requirements on the River Severn to that in their February 2017 response to our draft River Severn Drought Order EAR. The Agency has also reduced their monitoring programme such that a number of sites have been discontinued and again this was not highlighted in their February 2017 response.</p> <p>Having been informed we have liaised with the relevant EA officer and updated the relevant parts of the EAR.</p>	We have used the revised EAR to update the main text and appendices of our plan. As with previous plans we will update our monitoring plan on an annual basis with the Agency to ensure those data relevant to our proposed drought measures are collected.

EA - IMPROVEMENTS					
Area of issue	Issue and evidence	Implication	Recommended improvement	Company Response	Change to plan
Issue 3.4 – environmental assessment transfer option	<p>On page 77 the company state that through assessment there is potential for the transfer from the River Severn Works to Blithfield to cause deterioration in WFD classification, but the effect will not be long lasting. The details of this assessment have not been provided, it is not clear what the company mean by ‘not long lasting’.</p> <p>The EA provided comments (22 June 2017) to the company on this transfer drought option. We have not received answers to our queries.</p>	There is potential risk of WFD deterioration.	The company should provide more details on the assessment it has undertaken to assess the transfer. For example, the company state that WFD classification could be lowered but this effect will not be long lasting – how has this been assessed, has the company looked at change over annual average? The company should also address our comments raised on the 22 June.	<p>This comment relates to introduction of phosphate in treated water to the WFD classification of the Reservoir water body. We have refined our calculations using data arising from our Water Resources Management Plan studies this year. This demonstrates that the impact of treated water discharges is negligible for phosphate concentrations. Monitoring and mitigation measures have been included to address uncertainty in this assessment.</p> <p>A revised EAR which details this assessment has been published and forwarded to the Agency.</p> <p>The revised EAR highlights additional risk if the discharge is not operated as proposed.</p>	We have used the revised EAR to update the main text and appendices of our plan. We will draft our proposals for a discharge consent to ensure that the upside risks are appropriately mitigated and so that this measure is “permit ready”.

Consumer Council for Water			
Issue	Comments	Company Response	Change to plan
1.Engagement with stakeholders	The Plan demonstrates a good level of engagement with stakeholders and also recognises the different engagement strategies that will be required for different customer groups	We thank you for your comments	None
2.Engagement with business customers	The draft plan includes strategies for reaching business customers since the retail market opened in April 2017. However, we would like to understand if engagement will be tailored to the different sizes of business customers from micro through to large.	We would expect the engagement of business customers during a drought to be tailored by size and sector, both direct and through other retailers operating in our area. Specific engagement plans are developed as part of our early actions in a drought to supplement our normal water efficiency engagement activities.	None
3. Promotion of water efficiency	The draft plan also recognises the different needs of vulnerable customers and seeks to influence water efficiency behaviour through the company's on-going school engagement programme, which we welcome	We thank you for your comments	None
4.Communication with customers	We consider the non-technical summary on the company's website to be a clear way of communicating with customers in what is a complex issue. We welcome visibility of a sample leaflet on what a hosepipe ban would mean to a customer as an annex to the non-technical summary. It is essential for this to be clear, engaging and informative.	We thank you for your comments	None

Customer Panel			
Issue	Comments	Company Response	Change to plan
1. Preconsultation process	The Panel appreciates the opportunity to comment on the draft Plans. We are pleased to see that in the new draft, account has been taken of much of what we said at pre-consultation stage.	We thank you for your comments	None
2. Levels of Service	As we said in the pre-consultation, we think it unlikely that customers would find fault with the levels of service proposed, or the expected frequency of restrictions, both of which are unchanged from the current policy.	We thank you for your comments	None

3 Glossary	We welcome the addition of a glossary to the technical report.	We thank you for your comments	None
4 Non technical summary	<p>We consider that the changes made since pre-consultation render the non-technical summary much clearer, but have two recommendations:</p> <ul style="list-style-type: none"> • the paragraph and diagram on the level of risk attached to drought management options is hard to understand. 	We agree that further clarification is required	We have made the suggested changes to the text of our Non-Technical Summary
	We welcome the reduction in the time to be taken to implement a TUB in SSW from 9 weeks to 5.	We thank you for your comments	None
	The communications proposals are much improved. We support the intention to use social media, but point out that the Company website doesn't show on the Home Page or the Contact Page that the Company has a Twitter Account or a presence in Facebook and LinkedIn. Has the Company asked permission of customers for use of their mobile numbers and email addresses for giving warning of drought measures?	<p>Our Communications team have, at the time of writing, already added our Twitter Account link on our home page (https://twitter.com/SthStaffsWater). They are in the process of implementing our Facebook presence more widely.</p> <p>Since publication we have decided not to use LinkedIn for communications purposes as it largely used for recruitment by our Human Resources Department</p> <p>We will only use customers' details for messaging if they have agreed to this which is recorded on our billing system.</p>	Minor change to text to remove reference to LinkedIn in our main report
	There is a typo on page 13 of the SSW Plan: "linked it telemetry".		Text in NTS changed "linked to telemetry".
	On page 22 of the non technical summary typical daily usage is given as 150 litres, whereas on Discover Water it is 141 litres a day.	The figure for consumption of 150 litres per head per day has been a reference value in water efficiency literature across the water industry for a number of years. This has been higher than average consumption in our supply area for a number of years but it is only recently that average UK consumption has fallen below 150 litres per day. Because it is a figure commonly recognised we intend to continue to use it for now but will look to develop a common position with other companies in future.	None

EDF			
Issue	Comments	Company Response	Change to plan
Use of powers to restrict abstraction by others	<p>We are aware that during aquatic system stress events drought plans provide a framework within which a water company can seek to:</p> <ol style="list-style-type: none"> 1. Relax restrictions on their own abstractions and discharges; and 2. Impose restrictions on the abstractions and uses of water by others, including electricity producers. <p>This is a serious concern as it has the potential to compromise the ability of electricity producers to deliver their contribution to national electricity security. This could impose costs and risks on both electricity consumers and electricity producers during such aquatic system stress events.</p> <p>We are very pleased to see that these points have been taken into consideration by the South Staffs Regional Drought Planning process and that the draft Plan recognises that it would serve no useful purpose to restrict water supplies to electricity generators.</p> <p>We believe that these considerations are of national importance for drought planning and that DEFRA should take them into account when reviewing other drought plans.</p>	We thank you for your comments	None

Historic England			
Issue	Comments	Company Response	Change to plan
1.Impact of the DMP on heritage asset	<p>We can find no reference to the historic environment within this document and would recommend that you consider, through the Strategic Environmental Assessment (SEA) process, whether there are likely to be any impacts for heritage assets, designated and undesignated, through the specific proposals and policies. If there are likely to be environmental impacts then how can these be</p>	<p>The potential impact of our drought permits on archaeology and heritage sites was originally reviewed for us by Enviro in 2008. This assessment identified a number of sites for consideration and determined their hydrological sensitivity. Whilst the sensitivity of some sites was at times “medium” or “high”, the impact of our proposed drought permit was not such that these sites were affected. For our scoping reports as part of this plan we reviewed</p>	<p>We have added the statement to Section 7 for clarity:</p> <p>“The following sections largely summarise our updated understanding of environmental and water</p>

	avoided and/ or mitigated against	the Enviro assessment and confirmed that no new sites had been identified. Moreover our hydrological assessment has been further refined since 2008 such that there is no change to original (low) impact assessed for the reaches of concern.	quality receptors. The impact on the historic environment (cultural or heritage sites) was reviewed at scoping stage and our original assessment of no impact (Enviros , 2008) was found to be still the case.”
2.Improvements for heritage assets	There may also be opportunities to improvements for heritage assets, their condition and setting through the proposals and policies and we would request that you consider if these exist and how to utilise them.	We are not proposing any works in association with our plan and accordingly there are no opportunities for betterment of the historic environment.	None

Canal and River Trust			
Issue	Comments	Company Response	Change to plan
1. Hanch Tunnel Drought Permit	Since publication of the last Drought Plan, the Company has withdrawn its inclusion of a further proposal for the Hanch Tunnel Drought Permit. See section 6.3.9 (p59/60).	As stated in the plan - This is because evaluation of flow data from the Hanch Tunnel during the 2010/12 drought and discussions with the Environment Agency during baseline monitoring in 2013 suggested that the available yield for supply, once mitigation requirements are met, is too low to make the scheme feasible for use.	None
2. The River Blithe and River Trent Pumpback Drought Permit	The River Blithe and River Trent Pumpback Drought Permit. See section 6.3.9 (p61/62) is assessed in Section 7.3.1.1.5 (p77) and is considered to have negligible impact on recreational boating. The Trust would expect to be consulted before a Drought Permit was granted to ensure that recreational and commercial boating were not adversely impacted.	We are happy to consult with the Trust as part of our drought permit application process.	None
3. River Severn Works and River Severn Drought Permit(s)/Order(s)	The Trust notes potential in combination impacts on the Gloucester and Sharpness Canal abstraction from the River Severn (Sections 7.3, 7.4) and the proposed mitigation plans (Section 8.7.3). The Trust would expect to be fully engaged as a key stakeholder before Drought Permits and/or Drought Orders affecting the River Severn are approved	We are conscious of the sensitivity of the lower River Severn reaches to droughts and the Trust’s role as a significant downstream abstractor. Accordingly we are happy to undertake to work closely with the Trust and other abstractors in the event of a drought.	None