

# Appendix A

## Drought Plan Consultation

## 1. Introduction

South Staffordshire Water is committed to engaging with all the stakeholders who have an interest in this plan. The Company has undertaken consultation with these stakeholders and the public in preparing our drought plan, as explained in this document.

### 2.1 Pre consultation

In accordance with the EA drought plan guidance we have consulted with statutory consultees prior to producing our draft plan to identify any issues of importance and for any comments that we should consider in our plan. Our pre-consultation ran from 15th May to 12th June for which we contacted the following stakeholders to invite comments for consideration in the revised plan;

- Defra
- Environment Agency
- Natural England
- NFU
- Ofwat
- Customer Challenge Group
- Consumer Council for Water (CCW)
- Historic England

In addition, we consulted with local river interest and environmental groups.

Under the EA guidance we are also required to consult with any licensed water supplier which supplies water to premises in the undertaker's area via the undertaker's supply system. We are aware that Icosa Water have been granted a licence to supply water to customers in our supply area and we will include them in our drought plan consultation

The comments received during the pre-consultation are summarised in table 1 below.

**Table 1. Summary of Pre-Consultation Comments**

Consultee	Nature of response received
Defra	No response
Environment Agency	<p><b>1. Specific areas to address in your drought plan</b> There are a number of issues that you should resolve when preparing your draft drought plan.</p> <p><b>Commitments in the statement of response:</b> In the Statement of Response to your 2018 drought plan you committed to;</p> <p>1 - Commencing internal trials of an alternative operational curve for the Blithfield reservoir, to test whether this better represents operational circumstances.</p> <p>2 - The intention to undertake a review of all the drought curves during 2018/19, sharing the outcome with us and updating your drought plan accordingly if required. This would minimize the risk of using sub-optimal drought trigger curves and therefore improve the effectiveness of your drought plan.</p> <p>As we have not seen the outcome of this work to date, we expect you to share the results with us prior to submitting your draft plan and you should incorporate the relevant outcomes into your drought plan.</p> <p><b>Hampton Loade abstraction</b> You should consider the impacts of under abstracting against requested volumes at Hampton Loade when Chelmarsh reservoir is at capacity and whether this follows best planning and regulation practices. You should utilise the outcomes from the review of your drought curves in your considerations. You should not carry out any activities that cause risk to the environment during dry conditions.</p> <p><b>Experiences and lessons learnt from prolonged dry weather</b> The prolonged dry weather experienced during 2018 has highlighted the importance of drought planning to minimise the risk to public water supplies and the environment. You should ensure that you review and incorporate any lessons learnt from operational experiences and the prolonged dry weather into your drought plan.</p> <p>1 - Specifically you should review the operational issues in refilling Blithfield reservoir following the prolonged dry weather in 2018 and provide an explanation in your drought plan. You should incorporate the findings of this review to address any issues identified.</p>

2 - The request to discharge excess drinking water from the Severn surplus into Blithfield reservoir under a local enforcement position was not approved by us in 2018. There is remaining uncertainty about the risk that this option poses to the environment. You should continue to discuss this option with us prior to submitting your draft plan and share the option trial results. You should consider what alternative options are available if the discharge remains unfeasible and provide a worked example of actions you would take in similar circumstances.

3 - You should plan to implement your demand saving actions first and then prioritise the use of your least environmentally damaging supply actions in your plan. All supply actions in your plan must have the appropriate environmental monitoring and mitigation.

### **Communications and engagement**

1 - You should engage with neighbouring water companies and your regional water resources group WRW and its members when developing your plan. This includes the benefits of joint regional water resources group communication campaigns and aligned customer restrictions as well as regional supply actions.

2 - You should ensure that your actions are coordinated, for example the drought management of the River Severn with Severn Trent Water.

### **Bulk supply arrangements**

You should confirm if your bulk supply arrangements change in drought conditions and ensure that there is a common understanding of their operation in both companies' drought plans.

## **2. Wider issues to consider**

Water companies should follow the water company drought plan guideline when preparing their draft drought plans. This is available, along with any supporting guidance documents on the Defra Huddle: <https://www.huddle.com/> and also on request from our mailbox [Water-Company-Plan@environment-agency.gov.uk](mailto:Water-Company-Plan@environment-agency.gov.uk). For login details for the huddle or any problems with access, please contact Defra directly at [water.resources@defra.gsi.gov.uk](mailto:water.resources@defra.gsi.gov.uk).

We are pleased that in the pre consultation correspondence you commit to take account of the latest published guidance. Key changes to the guidance were outlined at the EA / South Staffs technical liaison meeting on the 28th April 2020.

We expect you to consider all relevant statutory requirements including the new Drought Plan (England) Direction, published April 2020 and the government's expectations for drought planning, as detailed in its letter of 6th April 2020.

## **3. Pre-consultation letter questions**

Our response to the specific question you raise in your pre-consultation letter is below. Your request:

**I should be particularly interested to learn whether your organisation has any proposals for drought actions which might affect our ability to supply our customer in the event of a future drought.**

	<p>You should utilise our West Midlands Area drought plan when preparing your drought plan, this is available on request from <a href="mailto:IEP_WMD_Waterresources@environment-agency.gov.uk">IEP_WMD_Waterresources@environment-agency.gov.uk</a>. This sets out how Areas can decide whether to change status for the whole Area or just for one or more catchments depending on what triggers have been met. This could affect the frequency and timescales of when your company operating area is defined as being in prolonged dry weather / drought. You should work with us to understand how these changes could affect your own plan.</p> <p><b>4. Customer and third party involvement</b></p> <p>To gain a wider range of views before preparing your draft plan we recommend that you consider consulting the following consultee during your draft drought plan consultation.</p> <p>1 - Icosa Water as they have recently been granted a licence to supply water to customers in your supply area.</p>
Natural England	No Response
Severn Trent	No Response
Water Resources West	<p>You will have noted new requirements and expectations for regional considerations for drought plans in England. In particular, the Drought Plan (England) Direction 2020 states that a water undertaker must address in its drought plan: “any voluntary steps that will be taken to collaborate regionally on drought management measures.”</p> <p>Furthermore, the government’s expectations for drought planning in England include:</p> <ol style="list-style-type: none"> <li>1 • Your new drought plans should ... demonstrate the wider role you will play in securing water supplies across your region.</li> <li>2 • Your plan should show... how your plan is consistent with relevant regional water resources plans and the expectations of the National Framework for water resources planning.</li> <li>3 • You should ...seek to work collaboratively at a regional level, especially when imposing customer restrictions. In doing this we expect companies to categorise their drought plan measures using the Level 1 to 4 definitions and to be consistent in their language around temporary use bans and possible exemptions.</li> <li>4 • We also expect you to learn from best practice and international examples to ensure your customer communications are highly effective and coordinated at a regional level.</li> </ol> <p>Water Resources West (WRW) is ready to support you in meeting these expectations. WRW is a cross-border group including parts of Wales as well as parts of England. Major water catchments, the Dee, Severn and Wye span the national border with shared water resources. We therefore encourage you also to consider such regional collaboration where appropriate within Wales.</p>

Following discussion and agreements between WRW members, which you have participated in, we expect that you will include the following elements within your new drought plan.

#### **Mutual aid**

Water Company members of WRW participate in Water UK's Mutual Aid scheme. Mutual Aid is in place to facilitate inter-company borrowing of equipment or services to supplement their own stocks during such incidents. This may be used, for example, to support water supplies by road tanker if necessary in a severe drought.

Water UK Council agreed that all member companies of the water industry should formally adopt a protocol to share the above with other member companies, to support the affected member company or companies during incidents, thereby enhancing the resilience and contingency options available to the industry as a whole. The protocol is set out in the Water UK Mutual Aid Manual. Each member company agrees to provide support to companies in need due to an actual or potential incident affecting their ability to provide essential services if requested by another member unless they are simultaneously managing an incident of their own where such equipment or labour is required, or where there is a credible threat of a similar incident to that company.

The Mutual Aid Manual includes protocols for regional coordination. Severn Trent Water will act as the regional coordinating company for the West Coordination Zone. It is recommended that all inter-company assistance is administered under the protocols in the Water UK Mutual Aid Manual.

#### **Code of Practice on Water Use Restrictions**

Water company members of WRW are all signatories to the Code of Practice on Water Use Restrictions.

WRW members cooperated with others in the industry to develop the code. The objective of the code is to have agreed common standards and approaches to restrictions and exceptions, consistent and coherent to customers, stakeholders, governments, regulators and the media. We have therefore signed up to the principles and practices set out in the code.

The Code of Practice provides guidance to water companies on the effective implementation of water use restrictions by way of Temporary Use Bans (TUBs) and Drought Orders (DO) to help manage demand during times of drought. The Code is designed to be used by water companies when they are updating their Drought Plans and when they are evaluating whether and how to implement water use restrictions during a drought.

All WRW water company members have therefore followed the code in preparing their drought plans and will also follow the code during a drought. WRW member companies will also carry out a joint review of exemptions to water use restrictions.

By doing this, those water companies considering or implementing restrictions, will be consistent and aligned as far as possible, so that customers can be confident that their interests have been considered and they are not disadvantaged, or perceive a disadvantage, in comparison to customers in neighbouring water company areas.

#### **Temporary Use Ban notice**

	<p>In addition to following the Code of Practice on Water Use Restrictions, water company members of WRW have shared their experiences of recent dry weather events.</p> <p>Based on these experiences, the WRW water company members propose to adopt a consistent form of notice for Temporary Use Bans.</p> <p><b>Regionally Consistent Data and Assumptions</b></p> <p>Through their work on developing a regional plan and consistent WRMPs, the water company members of WRW are adopting consistent data and assumptions. This includes, for example, consistent assumptions on the import and export of water between companies. Where appropriate, the companies have also used these consistent data and assumptions for their drought plans.</p> <p>WRW has established working groups for the shared catchments to progress evidence sharing and common datasets. These groups will continue to support the water companies in their management of water resources in a joined-up way throughout the period covered by this drought plan.</p> <p><b>Consistent Drought Communications</b></p> <p>Water company members of WRW have agreed to consistently adopt Level 1 to 4 definitions to categorise their drought actions. This represents a significant change from previous drought plans: companies will no longer refer to “drought triggers” or “drought zones” as they have done for a number of previous drought plans. It is designed to ensure that the drought plans consistent and coherent to customers, stakeholders, governments, regulators and the media. These levels will be used to support consistent drought communications.</p> <p>Furthermore, the members of WRW will seek to align their drought communications wherever appropriate. WRW’s customer and stakeholder management group will support the members in the alignment of communications across WRW. However, it should be noted that WRW is a large and diverse area, with differing hydrological characteristics. Therefore, at any time in a drought event, different parts of the region may be at different levels of drought response.</p> <p>In addition, as you continue to develop your drought plan, WRW remains ready to support you. Our members will jointly consider other proposals for regional coordination. For example we are carrying out work to consider consistency of support to non-PWS during drought and will update you on that in due course. Please don’t hesitate to contact me if I or WRW members can provide further support in the development of your drought plan.</p>
Ofwat	No response
Customer Challenge Group	Confirm that we had no comments to offer in advance of seeing draft plans, and by saying that we would appreciate the chance to view and challenge the draft plans when they are ready.
Consumer Council for Water (CCWater)	When considering a current Drought Management Plan and the revisions we would like to see, CCW’s main areas of focus are: the extent to which the company has engaged with its customers on its strategy for managing a drought; and the extent to which customers’ views and priorities are reflected in the company’s Drought Management Plan.

	<ul style="list-style-type: none"> <li>• We expect the revised Plans to make clear the company’s strategy: for engaging with household customers, both prior to and during a drought, and as the drought recedes;</li> <li>• for working with retailers to engage with non-household customers, both prior to and during the drought, and as the drought recedes; and approach to the phasing-in of temporary use restrictions (TUBs);</li> <li>• for how the company will approach an emergency drought situation; and</li> <li>• for promoting water efficiency in non-drought times. We would expect companies to utilise a wide range of methods of communication.</li> </ul> <p>We expect companies to follow the principles set out in the Water UK/UKWIR Code of Practice on Temporary Use Restrictions, and the recent National Framework for Water Resources. In doing so we want the company to demonstrate an understanding of the impact these measures are likely to have on different customer groups, and to show how this understanding has informed its approach.</p> <p>We also expect that incidents encountered since the 2018 Plan to be taken into account and the lessons learned to be reflected accordingly. For example, during the summer of 2018 and the COVID-19 pandemic there was/has been dry weather combined with high water demand. We want the revised Plans to explain if the supply challenges have led the company to reconsider any aspects of its response to drought, particularly with regards to vulnerable customers.</p> <p>In instances of dry weather combined with high water demand, it is important that the specific needs of customers are understood and delivered. We are aware that South Staffs Water has been actively promoting awareness of the Priority Services Register in a water efficiency leaflet and asking customers to register for assistance. We expect the learnings to be taken into account in the revised Drought Management Plans and built upon.</p> <p>On a regional level, we are aware that water companies are co-ordinating their water resources management planning. It would also be beneficial for there to be some closer alignment in the regional approach to drought management. We would like to see examples of how this is happening. For example, in the way TUBs are introduced and exemptions applied, or introducing regional communication strategies.</p> <p>In undertaking your Plan revisions, we would expect to see evidence of effective engagement with your customers. We would like you to consider whether stand-alone research on drought management and your communication strategy is required in order to provide this evidence. This will help to ensure your developing Plans are based on customers’ views and priorities.</p> <p>Finally, we welcome the non-technical summaries of your Drought Management Plans 2018. These helpfully set out the process you follow in times of drought. They are customer friendly summaries and we want to see a repeat of these documents as you revise your current Plans for both regions.</p>
Historic England	<p>We have engaged in a number of water plans for South Staffordshire water in the last few years and we are always keen to engage and for the historic environment to be fully considered at the earliest stage. It will be easier for us to</p>

	<p>comment on a document and suggest ways in which the historic environment can be protected and enhanced when we can understand what the proposals being considered are.</p> <p>It is important that any proposals consider how they may impact upon the significance of the historic environment, heritage assets and their setting, both direct impacts as well as indirect impacts. We welcome where the proposals will lead to an enhancement for the historic environment.</p> <p>If you have any initial proposals or a strategic direction for the plan then we may be able to offer more specific advice. It is necessary to consider issues such as whether archaeology, designated/undesigned or unknown, may be impacted by the particular proposals as there may be additional sensitivities for this asset type.</p> <p>It may be useful to peruse our previous comments on this type of plan and others that we have submitted to South Staffordshire Water.</p> <p>Please look at our website for additional information, as you prepare your iteration of the plan.</p>
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## 2.2 Consultation on the Draft Plan

We will publish our draft plan to Defra by the 1st April 2021 and following direction to publish our draft from the Secretary of State, there will follow a further public consultation on the draft plan and a statement of response to representations received.

The legislation and Drought Plan Regulation guidelines for consultation on the Drought Plan indicate that the following groups must be notified of the consultation, along with any organisations involved in pre-consultation discussions.

- The Secretary of State for Environment Food and Rural Affairs
- The Environment Agency
- Ofwat
- Relevant water undertakers –Severn Trent Water, Icosa Water
- The relevant Local Authorities
- Natural England
- English Heritage
- Canal and Rivers Trust (formerly British Waterways)
- The Consumer Council for Water

In addition to meeting these minimum requirements for consultation the Company will undertake additional consultation with a selection of interest groups or individuals.

- Members of Parliament
- The British Horseracing Authority

- The British Swimming Pool Federation
- The Car Wash Association
- The Horticultural Trades Association
- The National Council for the Conservation of Plants and Gardens
- The Royal Yachting Association
- The Racecourse Association
- The Turfgrass Growers Association
- The National Farmers Union
- The Country Land and Business Association Limited
- The Drinking Water Inspectorate
- The Angling Trust

Stakeholders wishing to make representations, comments or raise questions on the draft plan are advised to submit them to:-

Defra  
Water Company Drought Plan  
Department for Environment Food and Rural Affairs  
3rd Floor  
2 Marsham Street  
London  
SW1P 4DF

Or by E-mail to [water.resources@defra.gsi.gov.uk](mailto:water.resources@defra.gsi.gov.uk)

The consultation will be communicated to these parties by direct correspondence, and to the wider public via the Company website, a press release and any other appropriate communication channels.