

APPENDIX ‘B’ PRE-CONSULTATION RESPONSES

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1 PRE-CONSULTATION

As outlined in the Water Industry Act 1991, under Section 39B (7), prior to preparing a drought plan water companies must consult the Environment Agency, the Authority (Ofwat), the Secretary of State (Defra) and any licensed water supplier which supplies water to premises in the undertaker's area via the undertaker's supply system.

1.1 How we consulted:

A number of pre-consultation meetings and engagements were undertaken prior to the production of this Plan. Details of the meetings are given below in **Table 1**.

Date	Organisation	Engagement/meeting
11.08.20	Southern Water	Company liaison including how to reflect bulk transfers in our company plans.
14.11.20	Southern Water	Drought permit workshop. Seeking to understand how drought orders would play out in the event of prolonged dry weather across our shared abstractions on the River Itchen.
25.09.20	Environment Agency	Review of options appraisal for both WRMP24 and Drought plan.
10.12.20	Environment Agency	Approach to North Arundel Drought permit readiness and EAR.
22.10.20 10.11.20 28.01.21	Natural England	Company liaison meetings with the Regulator with drought permit options and progress reports on the agenda for discussion
Recurring meetings throughout 2020-2021	WRSE Drought Group	Routine fortnightly meetings of the WRSE drought group. Working towards consistency across the Southeast on assumptions made and application of the guidance.

Table 1: Pre-consultation meetings

We also sent a pre-consultation letter on the 12th October 2020 to a range of consultees, both statutory and non-statutory prior the production of the drought plan. An outline of this drought plan was sent to the consultees listed in **Table 2**. The three key questions that were asked to help steer this Plan are shown below and a copy of our pre-consultation letter follows.

Q1. Are you the best contact from your organisation to stay in touch with during the drought planning process? If not, please could you supply the name and email address of the relevant contact?

Q2. What emergency plan/s does your organisation have, if any, which would impact upon or be impacted by our Drought Plan? (Please provide a link if they are available online)

Q3. Do you have any immediate thoughts or considerations on our approach, or that you would like us to further take into account at the beginning of this process?

12 October 2020



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Dear Stakeholder,

At Portsmouth Water we supply drinking water to over 725,000 customers and need to ensure that we can continue to do so whilst tackling the ever growing challenges of climate change, increasing population and a water stressed South East region as a whole. It is expected that droughts will become more common in the future and we need to be prepared for this so that we can all act together when the time comes, ensuring the best interests of our communities and the environment are always kept in mind.

We prepare a Drought Plan at least every five years, and our current plan, which was published in February 2019, can be found here; <https://www.portsmouthwater.co.uk/wp-content/uploads/2019/02/Final-Drought-Plan-2019.pdf>.

The Drought Plan outlines the stepped approach we take in order to ensure water supplies are maintained for as long as possible in the event that prolonged dry weather threatens supplies. We are now in the process of preparing our next Drought Plan. The Environment Agency published their drought planning guidelines in April 2020 and so we will be reviewing our current plan and undertaking the appropriate reviews and updates to ensure our plans alignment with these.

We are therefore writing to you today to outline our proposed approach, and would greatly welcome your feedback so that we can obtain an early view on your thoughts and ideas on how we can ensure our Drought Plan is the best it can be for us all.

What's new for this Drought Plan?

1. Currently, our Drought Plan provides details on the technical methods and scenarios that were used to develop and test drought scenarios. In line with the guidance, this will be moved from the Drought Plan and referenced to our Water Resources Management Plan (WRMP) allowing the Drought Plan to concentrate on detailing how we will physically manage any droughts that

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occur. We will include a selection of worked examples to show the relationship between our WRMP and Drought Plan.

2. We have previously used triggers based on groundwater levels to prompt mitigation actions. This time round we will add indicative rainfall triggers alongside groundwater levels so that there is a clearer link through to the 'exceptional shortage of rain' common understanding (and legal definition) of drought.
3. Within the updated Drought Plan, we will show how we will measure the effects of our actions. These will include; reducing leakage, managing customer demand and, where we seek to temporarily change our abstraction allowances, how these might impact upon the environment.

Identifying drought triggers

4. Our drought triggers will be reviewed and aligned with the newly clarified Environment Agency classifications to ensure that there is consistency with neighbouring companies and the national picture, to aid better understanding to customers and stakeholders.
5. We will also present clearer links to our Drought Permit option, so that it is evident under which circumstances we would seek to use it, the lead in time required to do so and how this links in to our demand-side implementation timetable. To ensure that we are application-ready for this permit in advance, we will complete the environmental monitoring plan, environmental assessments and set out how we plan to minimise and mitigate any potential adverse effects.
6. We will also review and set out the triggers that we would use to identify the end of a drought and what that would mean in terms of stepping back from any drought management actions that have been implemented, and how we would communicate this information to our customers.

Drought Actions

7. We will review and update our demand-side (customer) and supply side (new water) management options and set out a number of worked examples to illustrate how we would manage these options during a drought. This will include a review of our estimated savings against each of the options such as Temporary Use Bans (TUBs) and Non-Essential Use Bans (NEUBs).

Communication

8. We will continue to work closely with our neighbours at Southern Water to ensure that our assumptions and expectations are aligned where we have shared resources and bulk supply agreements.
9. As part of our drought planning, we will not only continue to engage widely with our customers and stakeholders, but also with other companies within the region where we can all benefit from a more joined up approach in terms of our drought actions, and how we would engage with our wider stakeholder base during a drought.

We are also reviewing and updating our communication plan. We are keen to understand how others want us to work with them to enhance our drought planning and communication. With that in mind I would be really grateful if you might spend 5 minutes to reply to the questions below;

Q1. Are you the best contact from your organisation to stay in touch with during the drought planning process? If not please could you supply the name and email address of the relevant contact?

Q2. What emergency plan/s does your organisation have, if any, which would impact upon or be impacted by our Drought Plan? (Please provide a link if they are available online)

Q3. Do you have any immediate thoughts or considerations on our approach, or that you would like us to further take into account at the beginning of this process?

Please send your response to wrm@portsmouthwater.co.uk by **Friday 23rd Oct** with the subject line: Drought plan 2021 pre consultation.

We look forward to receiving any feedback, and working with you throughout the drought planning process.

Regards



Jim Barker

Head of Water Resources, Leakage and Smart Networks.

1.2 Who we consulted:

The following organisations were consulted and a total of six responded by the deadline of Friday 23rd October 2020. We did not receive any further responses following the deadline.

Organisation Consulted	Responded
<u>Regulators / Government</u>	
Defra	
Ofwat	
Environment Agency	Yes
Natural England	Yes
CC Water	
Organisation Consulted	Responded

CC Water	
<u>Water companies</u>	
South East Water	
Southern Water	Yes
<u>Councils/Authorities</u>	Yes – Joint Emergency Planning Team for Portsmouth City Council and Southampton City Council
Test Valley Borough Council	
West Sussex Council	
Winchester Council	
South Downs National Park Authority	
Havant Council	
Chichester Council	
Gosport	
Trusts	
Wessex Chalk Stream & Rivers Trust	
Sussex Wildlife trust	
Hampshire & Isle of Wight Wildlife Trust	
<u>Other</u>	
Jacobs	
LEEP	
Charles Burns	
John Hall consulting	Yes – on behalf of <ul style="list-style-type: none"> • West Sussex Growers' Association (WSGA) – Representing the Horticultural Industry in West Sussex • Farming & Rural Issues Group South East (FRIGSE) – Representing Farmers, Growers and Rural businesses across the SE of England
Organisation Consulted	Responded

	<ul style="list-style-type: none"> Summerley Estate Management Company Ltd. (SEMCO) – Representing 350 owners of properties on the Summerley Estate, Felpham"
Local resilience forum	
<u>Wholesale retailers</u>	
ADSM	
Castle Water	Yes
Anglian Water Business	
Business Stream	
Cambrian Utilities	
Clear Business Water	
Everflow Limited	
First Business Water	
Greene King	
Marstons	
Pennon (South West Water)	
Whitbread	
Regent	
Northumbrian	
SES	
Water 2 Business	
Stonegate Pub Company/BT/John Lewis	
Three Sixty	
TOR Water	
Water Choice	
Water Plus (Severn Trent)	
Organisation Consulted	Responded
TWRC	

Water Scan
Wave
Yu Water
Smarta Water
For information (WRSE)
Southern Water
Affinity Water
Thames Water
SES Water
SE Water
WRSE
Internal (for info)
DHCR

Table 2: Organisations consulted in pre-consultation process and who responded

1.3 [Feedback received and how this has influenced our draft Drought Plan](#)

Key themes were identified in the responses. **Table 3** lists these and illustrates how we have addressed them, including where they were addressed in the Draft Drought Plan.

Organisation	Theme	Summary of comments	Section where comments have been addressed
Southern Water	Bulk Supply	<ul style="list-style-type: none"> Confirm that the bulk import from Portsmouth water is still available – revisit the assessment 	Section 1.4.6
	Bulk Supply and communication	<ul style="list-style-type: none"> Continue to have close communications to ensure consistent messaging in drought plans 	Sections 1.5 and 4.4. This will be on-going.
	Bulk Supply	<ul style="list-style-type: none"> Review the option of adding a pain share clause into agreement for the import near Sussex North Source 	Section 1.4.6.2
	Drought permit	<ul style="list-style-type: none"> Carry out environmental assessment, develop mitigation 	Section 3.2.1.4
Organisation	Theme	Summary of comments	Section where comments have been addressed

Environment Agency		options and improve on environmental monitoring plan for North Arundel permit option	
	Drought permit	<ul style="list-style-type: none"> • Ensure clarity on existing monitoring that the EA are carrying out • Each water companies' responsibility of each water company for monitoring Swanbourne Lake area. • Outline drought actions that both Southern Water and PW will take for Southern Waters drought permit option • EA comments sent to PW on 31st July – need to be addressed 	Section 3.2.1.5
	Drought permit	<ul style="list-style-type: none"> • Ensure application ready. Prepare exceptional shortage of rainfall case and any other actions. 	Section 2.3 This will be done for the final plan.
	Rainfall triggers	<ul style="list-style-type: none"> • Add triggers covering a range of options from S3.2 WCDPG • Clarify source of rainfall data and use appropriate baseline data to inform the triggers. • Investigate use of the standardised precipitation index tool. 	Section 2.2 This will be investigated further in the next round of plans
Environment Agency	Worked examples, relationships	<ul style="list-style-type: none"> • Examples to show relationship between WRMP and drought plan. These should comply with S3.3 of the WCDPG – include issues of high demand, impacts of heat waves and outage of assets. • Consider lessons learnt from recent experiences around heat waves and other reason for increase in demand e.g: Covid pandemic 	Section 1.3.5, Appendix 'C' Appendix 'A'
	Bulk supply agreement	<ul style="list-style-type: none"> • Consideration of how drought options impact on bulk supply agreements with SW. • Will bulk supply arrangements change in drought conditions and ensure that there is a common understanding of their operation in both companies' drought plans • Ensure drought plans aligns with SW's and is consistent any other 	Section 1.4.6
Organisation	Theme	Summary of comments	Section where comments have been addressed

Environment Agency		<p>affected companies' drought plans</p> <ul style="list-style-type: none"> Consider including how bulk supplies will operate and change through a drought or when a bulk transfer may be turned on/off and to what extent. 	
	Drought actions prioritisation	<ul style="list-style-type: none"> Consider demand saving in line with WCDPG Prioritise the use of the least environmentally damaging supply measures before taking more water from the environment 	Section 3
	Drought actions prioritisation	<ul style="list-style-type: none"> Justify sequence of drought actions and how these limit impacts on customers and the environment. Identify and plan for actions that could be implemented in an extreme drought to delay the need for "Level 4" severe drought restrictions. 	Section 3.3 Section 3.4
	Drought Plan Guidelines	<ul style="list-style-type: none"> Follow drought plan guideline (April 2020) and consider all relevant statutory requirements. 	Section 1.2 Section 1.3
	Stakeholder engagement	<ul style="list-style-type: none"> Engage with neighbouring water companies/regional water resources group Include benefits of joint regional water resources group communication campaigns, aligned customer restrictions, regional supply actions. Show how you will work with neighbouring companies and other stakeholders to mitigate impacts of droughts and save/share water resources in times of extreme drought. Consider regional connections and collaborative actions and ensure actions are coordinated. Should demonstrate how you will pro-actively scale up your household and retail customer campaigns appropriately during dry weather. 	Section 3.3 Section 4.3.2 Section 4.3.3 Section 4.4
	Stakeholder engagement	<ul style="list-style-type: none"> Consider consulting any other groups of organisations that the 	Section 1.3.2
Organisation	Theme	Summary of comments	Section where comments have been addressed
		drought plan is likely to affect during pre-consultation.	Appendix B

	Lessons learnt consideration	<ul style="list-style-type: none"> Consider lessons learnt from recent experience of dry weather and recent combination of hot, dry weather and Covid-19 pandemic during spring and summer 2020 which caused high demand. 	Section 1.3.5
	Demand management	<ul style="list-style-type: none"> Use of water metering considered across Portsmouth Water area. 	Section 1.4.3
	Demand management	<ul style="list-style-type: none"> Scenarios updated to include 1 in 500-year drought 	Section 1.4.4 This will be done in the next round of plans
Castle Water	Stakeholder engagement	<p>Opportunities for Retailers to communicate with Customers on aspects that may impact both. Discuss long term volume requirements with customers.</p> <ul style="list-style-type: none"> Communications with Retailers on areas of potential drought due either to works or scenarios where the wholesaler envisages stressed areas in the plan. Ensure early, effective, efficient messaging to all NHH customers in events of stress. Retailers to review largest users and discuss expected changes in their operations which could reduce/increase stresses. Retailers are closely involved and can communicate collaboration between wholesaler and retailer to end user. 	Section 11 strengthened. Nava and Retailers brought out explicitly in tables of stakeholders, where previous implicit.
Portsmouth City Council & Southampton City Council Joint Emergency Planning Team	Stakeholder engagement	<ul style="list-style-type: none"> How you intend to engage with other stakeholders and partners 	Section 1.3.3

Organisation	Theme	Summary of comments	Section where comments have been addressed
John Hall Consulting	Demand management	<ul style="list-style-type: none"> Invest to reduce leakages to the absolute minimum. 	Section 3.1.2
	Demand management	<ul style="list-style-type: none"> Portsmouth Water, and all water companies, need to invest more to introduce meters to as near as possible to 100% of customers 	Section 1.4.3
	Supply enhancement	<ul style="list-style-type: none"> More reservoirs to be built by water companies all over England, especially in the South and East. 	N/A
	Supply enhancement	<ul style="list-style-type: none"> Private landowners and farmers should be encouraged to build more reservoirs so water can be stored during the winter and used in drought periods in the summer. 	N/A
	Water sharing	<ul style="list-style-type: none"> More interconnections between water companies to enable water sharing. 	Sections 1.4.6 Section 1.5 Section 3.3

Table 3: Comments from consultees and where they are addressed in drought plan