



Summary of consultation responses

Update of the water company drought plan guideline

November 2015

We are the Environment Agency. We protect and improve the environment and make it a better place for people and wildlife.

We operate at the place where environmental change has its greatest impact on people's lives. We reduce the risks to people and properties from flooding; make sure there is enough water for people and wildlife; protect and improve air, land and water quality and apply the environmental standards within which industry can operate.

Acting to reduce climate change and helping people and wildlife adapt to its consequences are at the heart of all that we do.

We cannot do this alone. We work closely with a wide range of partners including government, business, local authorities, other agencies, civil society groups and the communities we serve.

Published by:

Environment Agency
Horizon house, Deanery Road,
Bristol BS1 5AH
Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency

Further copies of this report are available from our publications catalogue:

www.gov.uk/government/publications

or our National Customer Contact Centre:
T: 03708 506 506

Email: enquiries@environment-agency.gov.uk.

© Environment Agency 2015

All rights reserved. This document may be reproduced with prior permission of the Environment Agency.

1. Introduction

We have reviewed and updated the water company drought plan guideline to take account of:

- new legislation (Water Act 2014)
- lessons learned from the 2012 drought
- feedback from the water industry about the previous guideline
- changes in how guidance is presented on GOV.UK
- new research and changes in technical methods

The new and updated guideline was released for consultation in July 2015. This document gives a summary of what was changed in response to the consultation.

2. How we ran the consultation

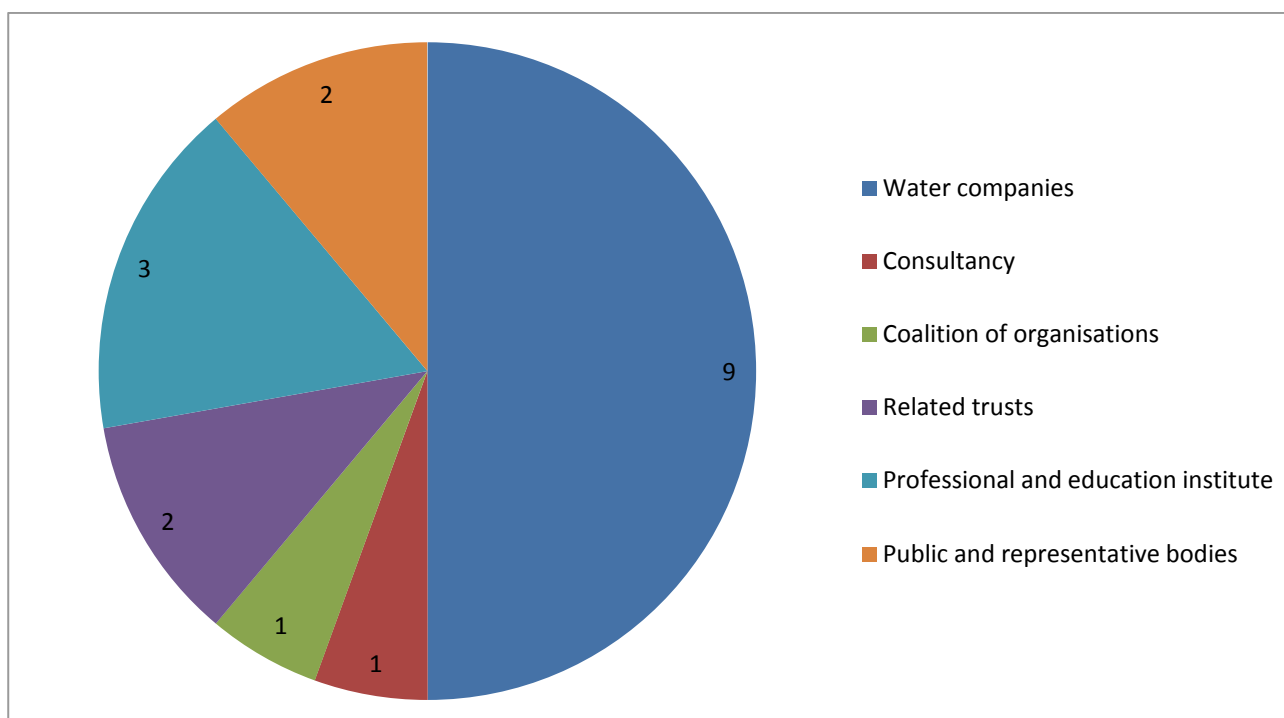
The consultation ran from 22 July 2015 to 31 August 2015 on GOV.UK. It contained the draft guideline and a series of questions. We promoted the consultation through:

- direct email correspondence to involved parties such as water companies, other regulators and non-governmental organisations
- WaterUK - they raised the profile to technical specialists in water resource planning within water companies
- conferences and workshops

GOV.UK returned consultation responses through an automated system - we received direct email and hard copy responses.

We received 19 responses in total, one of which was from a coalition of 13 individual environmental, water efficiency and fisheries organisations. This means in total 32 organisations were represented in the consultation.

This pie chart shows the types of organisation that responded:



3. Summary of findings and actions we will take

This document highlights changes to the water company drought plan guideline and where we intend to do further work. Here are the main findings and actions.

Closer links: drought plan and water resource management plan

There is support for closer links between the drought plan and water resource management plan (WRMP). Companies want more information on how they should link these 2 plans.

We have clarified the text of the guideline and started work on how the plans should be linked - we'll publish our work in early 2016. We'll continue to develop the planning process as we revise the water resource planning guideline - further links may be identified in the revised 2019 guideline, due for publication in 2016.

Resilience options

We want to make the role of resilience options in a drought plan, and how they should be funded, much clearer. In the guidance, we have outlined that if you find you need new resilience options while preparing your drought plan, you should set out your findings in the drought plan. The final evidence and funding you need should be provided in the WRMP and periodic review.

We want drought plans to remain mainly tactical plans that set out what water companies will do in response to drought. WRMPs should provide a strategic overview and justification for solutions that are funded via Ofwat's periodic review of price limits.

Droughts worse than those on record

We received extensive support for encouraging the assessment and preparation for droughts of greater intensity and duration than those on record. We have listened to the concerns of some consultees and note that there is a balance that companies must find to make sure this is proportionate to the risk posed.

Environmental assessment

Several consultees asked for more detail on what to include in an environmental assessment, including the before, during and after stages of drought. We were also asked to clarify the sections on monitoring plans and mitigation measures. We have made changes to the guideline to clarify our approach.

Outcome driven approach

A range of consultees asked for us to prescribe individual methods or approaches in the guideline. Our view is that where possible, we should not constrict the methods available to companies by prescribing these - companies need flexibility to choose the methods most suited to them. Your plans should be focused on the twin outcomes of secure water supply and environmental protection rather than set methodologies or approaches.

Water Framework Directive assessment

Some consultees asked for more clarity over how they should carry out Water Framework Directive assessments and how they should align them with river basin management plans. We have clarified the text in the guideline and will provide additional information in spring 2016.

Exceptional shortage of rain

Some consultees were concerned that providing a prescriptive assessment of the rainfall patterns that might lead to a drought permit or order might be an unnecessary burden. Our view is that it is not appropriate to set a prescriptive approach to assessing the exceptional shortage of rain. Each drought and each situation is unique.

We released a position statement in 2012 that gives more information on the principles and methods to consider. This is still valid and available from us on request.

4. Next steps

We have made the necessary changes to the water company drought plan guideline. The guideline has been signed off by Defra and the Environment Agency and is available on [GOV.UK](https://www.gov.uk).

We will produce these supporting documents (available on request) from spring 2016:

1. The guidance as an individual document rather than web pages.
2. A flow chart of water company drought plan statutory processes.
3. Extra information on approaches for environmental assessment.
4. Extra information on accepted approaches and methods from the last cycle.
5. Environment Agency area drought plan contacts.
6. How companies might choose to include resilience options.

Defra is planning to release new [Directions](#) in 2016. We expect that a small number of companies will need to prepare and publish new drought plans in 2016, with more to follow in 2017 and 2018.

Individuals who want to follow up their responses, or points made within this document, are welcome to contact us at: will.jacobsen@environment-agency.gov.uk.

**Would you like to find out more about us
or about your environment?**

Then call us on

03708 506 506 (Monday to Friday, 8am to 6pm)

email

enquiries@environment-agency.gov.uk

or visit our website

www.gov.uk/environment-agency

incident hotline 0800 807060 (24 hours)

floodline 0345 988 1188 (24 hours)

Find out about call charges: www.gov.uk/call-charges



Environment first: Are you viewing this on screen? Please consider the environment and only print if absolutely necessary. If you are reading a paper copy, please don't forget to reuse and recycle if possible.