

DRAFT DROUGHT PLAN 2013 STATEMENT OF RESPONSE

Prepared by the Water Resources Strategy Team Water Services Severn Trent Water Limited August 2013

On 10 May 2013 we started a period of consultation on our draft drought plan and the accompanying SEA and HRA. The consultation period ended on 5 July 2013. We received representations from the following organisations:

- The Consumer Council for Water (CCWater)
- The Environment Agency (EA)
- Natural England (NE)
- Natural Resources Wales (NRW)/ Cyfoeth Naturiol Cymru
- Nottingham City Council
- South Staffordshire Council
- Worcestershire County Council (WCC)

NRW provided a separate representation on our draft drought plan, the HRA and the SEA. Natural England's response covered all three documents whereas the CCWater, EA and WCC representations focused on just the draft drought plan.

This is our statement of response (SoR) and it shows how we have addressed all of the comments and suggestions that we have received. We have shown the comments that each organisation made in the tables below and said what we have done as a result. In most cases we have made changes to our 'revised draft drought plan' which accompanies this statement of response. In other cases we have not changed our plan but we have said how we can address the comment separately. Where we have revised our draft plan we have highlighted these sections in our 'revised draft plan' in yellow to show where the changes are.

As well as changing our draft drought plan we will also make changes to the HRA where this is necessary to address the comments we have received. We will not update the SEA Environmental Report that accompanied our draft drought plan as we have not made material changes to our draft drought plan. However, when we publish our final drought plan, we will also publish a SEA post-adoption statement. This will show how we have taken into account the comments we have received on the Environmental Report. We will provide our revised HRA to the relevant regulators and intend to make it available to other parties on request.

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Consumer Council for Water (CCWater)	CCWater would have liked to have seen a drought leaflet for domestic customers.	We have spoken to CCWater about their comments and they agreed to send us some examples of good practice so that we could use this in any future drought communications. We agree that having a leaflet of this sort ready would be useful. Following this representation and the hot weather of July 2013 we are considering a suite of communications that we can use for hot weather or drought events. We are doing this work now and will finish it before we consider imposing restrictions on our customers. However, we do not think that preparing this should hold up the publication of this drought plan. We already have a communication plan as we described in section 5 of our draft plan but we intend to continually improve how we communicate over time. For example, as social media change, we react to this.
	<p>CCWater were disappointed that we did not produce a non-technical summary to accompany our draft plan.</p> <p>To support this point CCWater provided us with suggestions for structure and content. One of these suggestions was put information about the exceptions we would make if we were to restrict customers use on our website.</p>	This is a good point and one that the EA also made. We have produced a non technical summary to accompany our revised draft plan. We have incorporated most of the CCWater suggestions either in the non technical summary or in our revised draft drought plan. However, we have not put the exceptions directly on our website as we think this may confuse customers into thinking that we have restrictions in place. We have shown the exceptions we intend to make in our revised draft drought plan. Once we are given permission to publish our drought plan it will be available on our website.
	CCWater think it would be useful for us to have had a frequently asked questions (FAQ) section as part of this consultation	We spoke to CCWater about this and they realise it is too late now for us to have one as part of this consultation but they would like us to consider this for future consultations. We agree with this point and we will consider including FAQ sections in future consultations.
	CCWater would like more information on how we intend to communicate with our customers. They point out that the commitment to use at least 2 local newspapers is only the minimum required. They also want to see a fully developed communication plan.	We have included a communications plan in section 5.2. When we spoke to CCWater they asked if we could go beyond the minimum requirements. We have already committed to doing more than the minimum by committing to do intense local broadcast activity in the escalation of messages table. We have edited this table to make this clearer. The 'suite of communications' that we mentioned earlier also helps to address this comment.

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Environment Agency (EA)	<p>The EA raised three major issues:</p> <p>1. They said that we should complete adequate Environmental Assessment Reports (EARs) in a timely manner. They referred specifically to completion of the Severn and Wye EARs. They said that if we can not bring forward the Wye EAR project plan then we should make an explicit commitment to update our plan once this EAR is complete.</p>	<p>We reviewed the delivery programmes for the Severn and Wye EARs to see if we can bring the delivery dates forward. We have brought the Wye programme forward but we have had to put the Severn programme back. Overall this means that we should have them both complete by autumn 2014 rather than December 2014. We have made significant changes to section 4.1 to describe what we would do in the extremely unlikely event that we need a drought order at either Wyelands (on the R. Wye) or Trimpey (on the R. Severn) before we have completed these EARs. We have also committed to update our plan when these EARs are complete. We do not think that this update constitutes a material change to the plan so we do not expect to run a formal consultation when we make this update.</p>
	<p>2. They asked us to explain why the frequency of Temporary Use Bans (TUB) and Non Essential Use Bans (NEUB) are the same.</p>	<p>We had already explained that our stated level of service is to restrict customers use no more than 3 times in 100 years. This means that the frequency of restrictions can be less than 3 in 100. To fully address this issue and to make our position clearer we have changed sections 1.3, 2.1 and 3.2 of our revised draft plan. In section 1.3 we have clarified what our stated levels of service are that we use in customer engagement. Within section 2.1 we have included a new table that shows the modelled frequency of NEUBs. In section 3.2 we have added new subtitles for section 3.2.1 (TUBs) and section 3.2.2 (NEUBs). Within section 3.2.2 we have provided a table that compares the stated and modelled frequency of restrictions.</p>
	<p>3. They asked us to give details of any approvals/ permits that we would need to implement drought management measures or the associated mitigation measures. This will mean we then comply with the Drought Plan Direction 2011 4(b) and 4(f).</p>	<p>We have created a new section in our revised draft plan to address this. The section is numbered 3.4.1 and we have also given details of the approvals/ permits that we will need in the tables in section 7.4</p>
	<p>The EA raised five moderate issues:</p> <p>4. They asked us to review our policy of “initially” imposing TUBs using administrative boundaries rather than WRZ boundaries. They asked that if we choose to proceed with a proposal for ‘Sub Zonal’ Temporary Use Bans then we should give details of how we take customers views into account.</p>	<p>We no longer say we will use administrative boundaries such as counties ‘initially’ but we still say that we want to reserve the right to put in restrictions at a non WRZ level if necessary. We have addressed this issue by changing the text in section 3.2.1. We have also edited section 1.3 to refer to our Water Forum which is one of the ways that we take account of customers’ views. We have also referred to the results of our latest research about customers views on the frequency of restrictions. We have not asked customers specifically about ‘sub zonal TUBs’ but we do not think that many of our customers understand WRZ boundaries. As shown in section 3.2.1 of our revised draft plan we now think that the clearest way to impose restrictions is</p>

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EA		at a company wide level. We think that this is the easiest option in terms of communicating with our customers and getting their understanding and engagement. We have still kept open the option of imposing TUBs at a smaller geographical scale but we think that it is unlikely that we would need this option.
	5. They asked us to specify what we mean by 'extra emphasis on leakage' and to give more details of this.	In our revised draft plan, we have added several new paragraphs into section 3.1 to describe what we mean by 'extra emphasis on leakage'. We have also altered the relevant part of section 5.2.
	6. They asked us to re-consider our timing assumptions for drought permits/orders	We have added a new sub heading and some text in section 3.4 to show that we estimate our lead in time will be a minimum of 7 days.
	7. They asked us to include a non-technical summary of our final drought plan.	We have produced a non technical summary which we will publish alongside our drought plan.
	8. They asked us to identify any work needed in advance to prepare the case for overriding public interest for both the Severn and Wye drought orders.	We have changed section 4.1 to address this point and also to address the issue relating to timings of the Wye and Severn EARs. We have also provided the information necessary to fulfil the various stages of the Habitats Regulations Assessment process.
	The EA raised seven minor issues:	
	9. They asked us to report estimated demand savings consistently in the draft plan.	We have edited section 7.4 to remove this inconsistency.
	10. They asked us to include information on how we monitor the effectiveness of drought communications.	We have addressed this point by adding some text in section 5.2 of our revised draft plan. In summary this shows that we measure demand and also measure elements of our communications work but it is more challenging to demonstrate a direct link between one and the other. This is because factors like the weather have a stronger effect on demand than communications.
	11. They asked us to include information on eel passage in the completed EARs for Tittesworth and the Avon/ Leam.	We are working with the EA to agree what we need to do in AMP6 and AMP7 in relation to the Eel Regs. We are dealing with this in our business plan but do not think that this is a drought plan issue. For example, we have provided the EA with our comments in relation to eel passage for our intakes from the Avon and Leam. We gave these comments in a spreadsheet form. The EA initially produced this spreadsheet and sent it to us. It does not include any mention of our Tittesworth/ Churnet intake. This is probably because barriers (such as the reservoir dam) and the long distance from the tidal limit prevent Eels from being present at our intake. Therefore, we do not think that we should include eel passage information in the Churnet/ Tittesworth EAR. Nor

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EA		<p>do we think that the EAR for the Avon/ Leam should include specific information on eel passage. The main reasons for this are:</p> <ol style="list-style-type: none"> 1. The EA agreed the scope of this EAR (as well as the scope of the Derwent and Tittesworth EARs) 2. We are dealing with eel passage issues through our NEP and business plan – this process is separate to our drought plans or EARs 3. We note that our fish monitoring for the Avon/ Leam EAR records eels when present and we are working collaboratively with the EA to address fish passage issues at Stanford reservoir in the Avon catchment as part of our WFD assessment of heavily modified water bodies (HMWBs)
	12. They want us to acknowledge that we may need to update our Environmental Assessment Reports before we apply for a drought permit (order).	We have done this by adding some text to the 2 nd paragraph of section 4.1 in our revised draft drought plan.
	13. They pointed out that the dates for completion of the Tittesworth Avon/ Leam EARs have passed. They asked us to ensure that they are complete in time for the final plan.	We have updated the timings in section 4.1 to remove the out of date information. We have said that we expect these EARs to be finalised by autumn 2013 which is when we hope to publish our final 2013 drought plan. The exact timing of when these EARs are signed off depends in part on the EA.
	14. They have asked for our final plan to contain reference points for groundwater drought triggers. They suggest that we could consider using the same groundwater triggers as the EA	Our draft drought plan already said that crossing the black line on our 'source performance diagrams (as shown in section 7.4) broadly equates to drought trigger zone E. We have edited sections 2.1.1 and 2.2 significantly to clarify how we will manage our zones fed by groundwater (and/ or river abstractions) during a drought.
	15. They asked us to include licence information for specified drought permit sites.	Our draft drought plan already included some licence information. For example, we included a table showing both 'normal' and drought permit abstraction and flows for our Ambergate and Derwent Valley sources. We also included a table showing how much we can abstract at Trimpey and Hampton Loade when flows at Bewdley are above 850 Ml/d. We have added a table to section 2.1.1 as part of our description of our 'normal' operations at Wyelands in the Forest and Stroud WRZ abstraction regime. In addition we have added some new text and abstraction licence information to section 4 of our revised draft plan to clarify how we 'normally' operate at these sites. We

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EA		have kept this information high level as we want our plan to be in plain English. We have not included direct quotes from our abstraction licences as these documents are not written in plain English.
Natural England (NE)	They have concerns about the way in which we will incorporate the findings of the HRA into our final plan.	We have considered the findings from the HRA screening whilst developing our draft drought plan. In particular we are ensuring that we would only implement drought permits/ orders that have the potential to impact on Natura 2000 sites after we have implemented all other available options. We have clarified this in our revised draft drought plan. We will review the outcome of the Environmental Assessment Reports and discuss any implications for our drought plan with Natural England, the EA and NRW.
	They commented that our draft HRA is not able to show if several protected areas will not suffer Likely Significant Effect and they think it is unclear if we have a fall-back position to avoid this.	This is linked to the issue the EA (and NRW) raised about the Habitats Directive sites on the Severn and Wye. We have made several changes to section 4.1. We have said that, in the unlikely event of applying for a drought order before the EARs are complete then we will do an assessment with the data that we have available at the time. This is part of our fall back position as are the changes we have made to section 4.1. These changes include clarifying our position that drought permits/ orders for Wyelands and Trimpey are effectively last resorts. In addition, we have committed to update our drought plan when we have finished the Severn and Wye EARs. We have referred to working with NE on both EARs in section 4.1 of our revised draft plan.
	They think that the dependencies that the drought plan has on our WRMP means that the 2 documents “cannot be considered alone”. They also ask if we can ameliorate the impacts of our drought plan actions by different options in the next WRMP and ask us to clearly identify this in both the plans.	Although there are dependencies between plans we think that readers can consider this plan alone. For example, other organisations were able to do this. To make it easier for readers to understand what the purpose of our different plans is, we have added a table to section 7.4. We refer to this table in section 1.3 of our revised draft plan. It is true that some of the options identified in our dWRMP may affect some of the measures described in our drought plan but our 2013 draft drought plan is a short term operational plan and must show what we would do now. If/ when we implement any of the options identified in our WRMP and they significantly affect our drought plan then we will address this when we update or republish our drought plan.

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NE	<p>They are concerned that while the Drought plan illustrates a strong management structure and processes it is not clear who will lead, within the company, on ensuring that the environment and biodiversity in particular is considered.</p> <p>They think it is not clear how the impacts on biodiversity and protected sites will be considered when we decide on the order and extent of the drought options within our plan. They ask for us to provide clear lines of responsibility in our plan to show that our management process is HRA compliant</p>	<p>We have edited section 5.1 of our revised draft drought plan in response to this. In the DAT circulation list table we have made it clear that responsibility for considering protected sites, the environment and biodiversity lies with our water resources planning manager.</p>
	<p>They welcome the inclusion of stakeholder involvement in the process but think it is unclear how this will feed into day to day drought management.</p>	<p>One example of involving stakeholders in 'day to day' drought management involves the regular water resources updates that we sent to the EA and water companies on the Water UK water resources email network during the drought which ended in 2012. In our response to the CCWater comments we mentioned a 'suite of communications' that we are preparing to help us respond to extreme weather events/ droughts. We expect this to include a timeline showing which stakeholder we will contact at which point. As we stated earlier we do not think that we need to complete this suite of communications before we publish our final drought plan.</p>
	<p>HRA- General</p> <p>They think that our HRA needs to consider the in combination effect of other related plans in more detail.</p> <p>They think the lack of completion of the HRA assessments for the Severn and the Wye and, potentially the in combination impact on the Humber, could lead to a final plan that was not Habitat Regulations compliant.</p> <p>HRA- Humber Estuary SPA/ SAC</p>	<p>We will revisit our 'in combination' assessments in our Final HRA report. This will take account of recently published Drought Plans and draft Water Resource Management Plans of other water companies. Also see our response below in relation to the Humber Estuary.</p> <p>We acknowledge these concerns and we are working to complete the EARs for the River Wye and River Severn options to inform the HRA process. We have included updated timescales for the EARs in our revised draft plan. We will be updating the 'in combination' assessment for the Humber in the Final HRA report (see below).</p> <p>Our Derwent Valley /River Derwent EAR considered flows into the Humber Estuary SAC. We have shared this EAR with NE. This EAR came to the</p>

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NE	<p>They say we need to do a more detailed analysis of the potential impacts on the Humber Estuary SPA/SAC with relation to the impacts of Yorkshire Water's draft water resources management plan (WRMP) and drought plan.</p> <p>HRA- Severn Estuary SPA/ SAC</p> <p>They say we should ensure that we fully consider the 'in combination' effect of the Environment Agency's drought plan for the Severn in our consideration of in combination effect.</p> <p>HRA- River Wye</p> <p>They have concerns about the lack of available options in the plan should the future Appropriate Assessment identify a significant impact</p> <p>Alternative Options</p> <p>There do not appear to be any alternative options for dealing with likely significant effect on the three sites above. Options that were considered, which have been excluded on financial grounds would have to be reconsidered by the company before a proposal that causes likely significant effect on a Natura 2000 site could proceed to a test of over-riding Public interest.</p>	<p>conclusion that the potential impacts were negligible both alone and 'in combination' with Yorkshire Water's drought plan options. Our Final HRA will also take account of the recently published draft WRMPs for Severn Trent Water, Anglian Water and Yorkshire Water in an updated cumulative assessment. However, given the scale of these drought permit options and their distance upstream of the Humber Estuary SAC/SPA, it is unlikely that there would be likely significant effects.</p> <p>We are working with the EA, South Staffs Water, NRW and others to ensure that we fully consider the 'in combination' effects of our drought plan for the River Severn. We note that the EA's environmental report for its R. Severn drought order includes an 'Appropriate Assessment' that considers the 'in combination' effect of our Trimley drought permit/ order as well as their drought order. We will provide comments to the EA about this work.</p> <p>The options that we have available to supply the area currently fed from our Wyelands abstraction are very limited in the event of a severe drought. We have set out all of the options that are feasible and available, ensuring that this drought order is a last resort and that we implement all of the other options set out in our draft drought plan first.</p> <p>As described in section 4.1 of our revised draft plan we only expect to need these options roughly once in 100 years. In addition we have committed to only apply for these drought orders after consulting NE, the EA and NRW and looking at all technically feasible alternatives that we could put in place in the timeframe of a drought. We are not aware of any options that we have excluded on financial grounds. Whilst preparing this plan and our dWRMP we have considered a wide range of options including all feasible, practicable measures for each of our Water Resource Zones. This includes the option of transferring water into the Water Resource Zone from elsewhere in the WRZ</p>

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NE		or from another WRZ. This is numbered action 7 in the Forest and Stroud decision flow chart (see section 2.1.1 of our draft plan). We will already have implemented this action before we consider applying for drought orders. It is useful to note that transferring water into the Forest and Stroud WRZ from Mythe water treatment works for a prolonged period may not be feasible as it could bring unacceptable public health risks relating to drinking water quality. In addition to sustain this transfer we would need to have enough water to transfer but we would certainly look at this and any other alternative actions before proceeding with an argument of over riding public interest.
Natural Resources Wales (NRW)	Recommendation 1 – Drought scenarios (with respect to Llandinam and Shelton zones) <ul style="list-style-type: none"> • They recommend that we should use scenario assessment to test how robust our drought triggers are and that we should describing our approach, assumptions and how we have developed drought triggers • They suggest that the addition of control curve diagrams to illustrate the link between trigger levels and scenarios would be useful to clarify the scenario testing the company has undertaken • They recommend that we consider a scenario which is more extreme than past recorded droughts to show how resilient its sources are in a drought. 	We have edited section 2.1.1 and section 2.2 to address this recommendation. The changes we have made includes referring to the UKWIR guidance for calculating groundwater DO and adding tables that show the Shelton and Llandinam WRZ constraints on our groundwater sources.
	Recommendation 2 – Groundwater drought triggers (with respect to Llandinam and Shelton zones) <ul style="list-style-type: none"> • They recommend that we provide resource zone specific information about these triggers for groundwater dominated zones 	We think that the changes that we have made to sections 2.1.1 and section 2.2 (mentioned above) have also addressed this recommendation. The text that we have added to our revised draft plan describes our approach to groundwater triggers and we have given resource zone specific information for both the Shelton and Llandinam WRZs.
	Recommendation 3 – Leakage reductions <ul style="list-style-type: none"> • They recommend that we provide more information on how we plan to reduce leakage during a drought. 	This the same issue that the EA raised and we described how we have addressed this in our revised draft plan earlier.
	Recommendation 4 - Environmental Assessment Reports for drought permit/orders They recommend that we either complete the Severn and Wye EARs to inform the final drought plan or, as a minimum, in time to	This is similar to the issue the EA raised and we have spoken to NRW and the EA about this issue. We have made several changes to section 4.1 in response to this recommendation. One change was to remove the RoC work as a reason for not finishing the Wye EAR sooner. We have said that, in the

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NRW	inform a drought permit/ order application. They asked us to carry our EARs/ HRA with existing information. They ask us to consult them in relation to both EARs. They suggest that we should not use the ongoing RoC work as a reason for delaying the Wye EAR.	unlikely event of applying for a drought order before the EARs are complete then we will do an assessment with the data that we have available at the time. We have committed to update our drought plan when we have finished the Severn and Wye EARs. We have said in section 4.1 that we will consult NRW on both EARs.
	<p>Recommendation 5 – Environmental monitoring</p> <ul style="list-style-type: none"> • They recommend that we set out our proposals for environmental monitoring during a drought and post drought • and that we mention any Natural Resources Wales or Environment Agency sites that we will use for monitoring and how we will incorporate this data in the environment assessment report • and that we give more detail about mitigation measures 	We summarised our proposals for baseline monitoring in section 4.2 of the draft plan. We mentioned 'in drought' and 'post drought' monitoring in section 4.3. As we said in section 4.2 of our plan we have agreed Site Investigation Plans (SIPs) with the EA for the EARs that we have finished or almost finished for sites in England. This means that we agree the EA/ NRW sites where we will need data and it reduces duplication or missing important data. As we are working with NRW and the EA to produce the Severn and Wye EARs this will give us an opportunity to agree which sites we should use. When we have completed these EARs they will provide further clarification on monitoring requirements for the River Severn and River Wye. We have shared the signed off Derwent EAR with NRW they can see what format our EARs take and what detail they contain. In addition, we have added some text into section 2 of the revised draft plan to describe monitoring sites which act as triggers and data. In terms of mitigation we have described this in section 4.3 of our draft plan and in the relevant sections of our EARs.
	<p>Recommendation 6 – Planned lead in times for drought permits/orders</p> <ul style="list-style-type: none"> • They recommend that we consider the time we will require to prepare an application including the time to update or revise supporting material. They suggest that we identify additional triggers for this preparatory work. 	This is similar to the issue the EA raised and we have spoken to NRW and the EA about this issue. We have added a new sub heading and some text in section 3.4 to show that we estimate our lead in times will be a minimum of 7 days.

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NRW	<p>Recommendation 7 – Non Essential Use Ban (NEUB) frequencies</p> <ul style="list-style-type: none"> They expect a lower planned frequency for NEUBs compared with TUBs and asked us to explain this apparent contradiction. 	This is identical to the issue the EA raised and we have described how we have addressed it earlier in this table.
	<p>Recommendation 8 – Resource zone specific operations</p> <ul style="list-style-type: none"> They asked us to provide specific information on Llandinam and Shelton resource zones (both located in Wales) and our abstraction on the Wye at Wyelands, with regards to how we currently operate these zones and how we would operate differently in a drought 	This is similar to recommendations one and two. We have spoken to NRW about this issue and we have included some resource zone specific information on both Llandinam and Shelton in section 2.1.1 and 2.2 of our revised draft plan. For example, we have included more information and a table in section 2.1.1 to describe our Wyelands abstraction. This illustrates how we would operate 'normally' and in a drought.
	<p>Recommendation 9 – Communications</p> <ul style="list-style-type: none"> They recommend that we include information on how we will monitor the effectiveness of our communications during a drought and that we provide further clarity within our final plan on how we have consulted the relevant consumer and interest groups 	The first of these points is the same issue that the EA raised and we have described how we have addressed this in our revised draft plan. To address the second part of this recommendation i.e. clarifying how we have consulted relevant consumer and interest groups, we have made several changes to section 1.5 in our revised draft plan. This section is no longer about how to respond. It now describes how we have consulted and how we have responded to this consultation.
	<p>Recommendation 10 – End of drought</p> <ul style="list-style-type: none"> They recommend that we provide further information on our end of drought actions and indicators and that we clarify how and when we will review the effectiveness of our drought plan after a drought and any outputs which may be produced as a result They ask that we liaise with them to agree the end of a drought 	We have described our end of drought indicators and what we will do at the end of a drought in section 6. This section states that our drought action team (DAT) will review our drought management processes once 'normal conditions' have resumed. We do not think there is anything further that we can usefully add to this. In response to the request to consult NRW when we are agreeing the end of a drought, we have added them to the relevant part of section 6 in our revised draft plan.
	<p>Recommendation 11 – General</p> <ul style="list-style-type: none"> They want us to change references to EA Wales to NRW and to acknowledge NRW as part of the consultation process They recommend that we consider their drought plan They recommend that we cross reference our emergency plan and that we provide information on sites which we use for monitoring triggers plus sites where we require data exchanges in the future 	Where appropriate we have changed the references to EA Wales or the Countryside Commission for Wales to NRW. We have added NRW to the stakeholders listed in section 5.2. We have reviewed and referenced the drought plan that is still entitled 'EA Wales drought plan' and we look forward to reviewing any future NRW drought plans. We had mentioned our emergency plan in the 'emergency drought orders' section of our draft plan but we have made this clearer in section 3.4.2 of our revised draft plan. As mentioned in relation to recommendation 5, we have added some text into section 2 of the revised draft plan to describe monitoring sites which act as

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NRW		triggers and data exchanges.
NRW's separate response to the SEA that accompanied our draft drought plan	<p>The key point that they raised was the</p> <p>Timing of environmental assessment completion</p> <p>They recommend that we prepare EARs and appropriate assessments for River Severn at Trimpley and River Wye at Wyelands using available data and update when planned monitoring for baseline data is completed. We ask that we consult with NRW throughout this process.</p>	<p>We have already covered this issue in relation to the first point the EA raised and when addressing the NRW recommendation 4. In addition we have already produced EARs previously for both of these options, but these do require updating. We are in the process of updating the River Severn at Trimpley EAR this year (2013). We are working on the River Wye EAR update and intend to complete it by autumn 2014. This timescale takes account of the monitoring being carried out this year under the wider Wye and Usk Investigations Programme. We will consult with NRW on these reports the provision of information required by NRW to complete the Appropriate Assessment over the coming months.</p>
	<p>Appropriate Assessment of Wyelands drought order</p> <p>They recommend that we do not use the review of Consents (RoC) on the River Wye as a reason for delaying the production of the EAR and appropriate assessment for of the Wyelands drought order because it is unlikely that the licence changes associated with this work will be implemented within the timeframe of the drought plan.</p>	<p>We have partly addressed this point when responding to NRW's recommendation 4. We have changed section 4.1 of our revised draft plan accordingly. We would also like to clarify that we do not need the RoC work to be complete before we finalise the Wye EAR. However as the Review of Consents work has led to additional monitoring under the Wye and Usk Investigations Programme we do want our updated EAR to take account of the latest and most complete monitoring data. When we have completed the EAR it will help provide the information that NRW require to complete the Appropriate Assessment. We agree that the licence changes are unlikely to be implemented within the timeframe of this drought plan publication. We will consult with NRW on this work over the coming months.</p>
	<p>They recommend that we clearly state in our drought plan that we will only apply for drought permit/orders for the River Severn at Trimpley and River Wye at Wyelands if we have exhausted all alternative supply options and implemented appropriate demand side options.</p>	<p>Our drought plan provides text and decision flow charts that show details the order in which we will implement different drought management actions. This indicates our intention to use drought order/permits only once we have implemented other supply-side options and demand-side options, including Temporary Use Bans. We have changed section 4.1 in our revised draft plan to show that these drought order options are effectively last resorts. We have discussed the frequency of these drought orders earlier in this table.</p>

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NRW – SEA	<p><u>Other clarifications in Annex A</u></p> <ol style="list-style-type: none"> 1. They ask us to use of the word effect instead of impact 2. They agree with our SEA finding of adverse effects from River Severn at Trimley and River Wye at Wyelands options 3. They think there is a need for additional consideration of potential effects arising from less dilution due to low flows and temperature changes due to low flows. 4. They say that there is uncertainty inherent in the use of the word 'may': "Work carried out to date indicates that even with the drought permit or drought order in place, flows in the River Severn downstream of Trimley during drought conditions may still be higher than would naturally have been expected due to the benefit of the River Severn flow regulation scheme" p4 5. They agree with our SEA finding of major adverse effects and cumulative effects on the River Wye. They recommend that we progress the EARs and Appropriate Assessments 6. They agree with the statement that drought management options may have 'different environmental effects dependent on the season of implementation'. They say we should also consider the seasonal presence and varied life 	<p>We will reflect this in our SEA post adoption statement</p> <p>We have noted this point.</p> <p>Our SEA provides a strategic assessment of the drought plan options and the assessed effects have taken account of reduced dilution and higher temperatures arising under low flow conditions. We will consider these hydrological and ecological impacts in further detail in our EARs.</p> <p>The hydrological assessment work which we will carry out as part of the River Severn EAR will address this uncertainty and demonstrate the extent to which the Severn Regulation Scheme maintains low flows higher than would occur naturally in a drought.</p> <p>We have noted this – please also see our response about the timings of our EARs and provision of information to NRW to complete the Appropriate Assessments.</p> <p>The assessments we presented in the SEA were based on 'worst case' conditions specific to the option under consideration, including any specific timing of the measure where applicable (e.g. winter only, moderate to high</p>

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NRW – SEA	<p>cycles of many 'features of interest' in SAC watercourses affected by this draft drought plan e.g. salmon, eel, allis and twaite shad etc. It is unclear what worst case scenario is being applied in assessing significant effects. Their view is that a "generic" worst case would not be appropriate. They say that clarity on what constitutes worst case and whether this is generic to the assessment or specific to options would be beneficial</p> <p><u>Baseline and context</u></p> <p>7. They welcome the incorporation of scoping stage comments</p> <p>8. They suggest that we could consider the Welsh Government Infrastructure Investment Plan in addition to the UK Government's Infrastructure Plan</p> <p>9. They suggest we consider the NRW drought plan (currently titled Environment Agency Wales drought plan)</p> <p>10. They ask us to refer to Shoreline Management Plans and Forest Design Plans</p> <p><u>Review of baseline conditions</u></p>	<p>flows only), and considering life cycles of 'features of interest'. The strategic nature of SEA inevitably requires us to take a composite view to ascribe a single 'significance of effect' rating. We provide specific details for specific species in our EARs.</p> <p>We have noted this point.</p> <p>We will obtain and assess this plan. We will incorporate any relevant issues into our SEA Post Adoption Statement.</p> <p>We can confirm that we considered the EA Wales drought plan in carrying out the SEA and it is found in Table 2.1 (p30). Our SEA Post Adoption Statement will confirm this more clearly.</p> <p>We have considered relevant shoreline management plans as noted in Table B.1. We will confirm this more clearly in our SEA Post-Adoption Statement.</p>

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NRW – SEA	<p>11. They welcome the reference to hydrological continuity, however they suggest for the purposes of clarification, the environmental baseline should make clear that consideration of hydrological connectivity and ecological connectivity must include areas both downstream and upstream of water resources supply points.</p> <p>12. They say we should refer to those areas in Wales which are included on the Register of Historic Landscapes.</p> <p>13. They would welcome clarification on what we mean by 'irreversible damage' to natural heritage.</p> <p>14. They suggest additional issues include the resilience of infrastructure and resources to climate change effects and the need to supply water resources within environmental limits and capacities.</p> <p>15. They suggest that we refer to the need to maintain waters in terms of their ecological functions, capacities and limits.</p>	<p>We have considered hydrological and ecological connectivity upstream and downstream of abstraction sites, and will make this clearer in the Post Adoption Statement.</p> <p>We considered the Register of Historic Landscapes for both relevant areas of England and Wales throughout the baseline section (see page 40 and p210)</p> <p>Irreversible damage refers to damage which leads to a permanent loss or degradation such that the current condition (prior to the impact occurring) cannot be restored.</p> <p>We have noted this. The SEA objectives and indicator questions do pick up these issues and were a consideration in carrying out our assessments. In particular, the following SEA objectives (see Table 3.1 of Environmental Report) sought to encompass these issues:</p> <ul style="list-style-type: none"> • To adapt and improve resilience to the threats of climate change. • To ensure reliable, resilient and sustainable water resources for people, economy and the environment. <p>We note these comments. The following factors were encompassed in the SEA objectives and indicator questions:</p> <ul style="list-style-type: none"> • The need to sustain and improve the resilience, flexibility and

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NRW – SEA	<p>16. They suggest that we refer to the need to maintain soils in terms of their ecological functions, capacities and limits and their role in carbon storage, e.g. peat.</p> <p><u>Methodology</u></p> <p><u>Table 3.1</u></p> <p>17. They suggest that indicator questions should acknowledge the need to protect and maintain ecological functions and respect environmental capacities and limits.</p> <p>18. They suggest that the word ‘efficient’ be replaced by ‘sustainable’</p> <p><u>Soils</u></p> <p>19. They suggest that indicator questions should acknowledge the need to protect and maintain ecological functions and respect environmental capacities and limits.</p> <p>20. In respect of cumulative effects, they ask us to refer to the Habitats Regulations Assessment for this draft drought</p>	<p>sustainability of water resources in the region.</p> <ul style="list-style-type: none"> • Balance the abstraction of water for supply with the other functions and services the water environment performs or provides. • The need to protect, maintain and enhance peat land and organic soils within the region. <p>The indicator questions for Biodiversity encompassed these points, include the following (see page 47 of Environmental Report):</p> <ul style="list-style-type: none"> • Will it contribute to the sustainable management of natural habitats and ecosystems, i.e. within their limits and capacities? <p>We think that this was reflected in the following indicator questions:</p> <ul style="list-style-type: none"> • Will it help to encourage sustainable design or use of sustainable materials (e.g. supplied from local resources)? • Will it minimise the use of energy and promote energy efficiency or support the use of sustainable/renewable energy? <p>We have noted this point but we think that this is reflected in the following indicator question:</p> <ul style="list-style-type: none"> • Will it protect and enhance the quality of soils? <p>Our cumulative assessment utilised the HRA findings throughout the assessment and is discussed in the assessment sections of the SEA. We acknowledge that we could have stated this more clearly in the methodology</p>

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NRW – SEA	<p>plan.</p> <p><u>Assessment of drought options</u></p> <p>21. River Severn at Trimpley Given this assessment's finding of major adverse effects on water quality and hydrodynamics, they were surprised that similar major adverse effects have not been identified in respect of biodiversity and other environmental topics. They agree that sequencing of option implementation will be dependent on the spatial distribution of drought. They suggest that the severity of potential adverse effects will also be time dependent.</p> <p>They require reassurance that the sequential approach for option implementation will make clear that the option for the River Severn at Trimpley will, notwithstanding the conditions of drought, only be considered where all other, less damaging options and measures have been exhausted.</p> <p>22. Forest and Stroud (River Wye at Wyelands) They require reassurance that the sequential approach for option implementation will make clear that the option for the Wyelands will, notwithstanding the conditions of drought, only be considered where all other, less damaging options and measures have been exhausted.</p> <p><u>Assessment of drought options</u></p> <p>23. Dŵr Cymru Welsh Water (DCWW)</p>	<p>section. We will clarify this in the SEA Post-Adoption Statement.</p> <p>Our assessment considered the implications of additional abstraction at Trimpley on river flow and water quality as being major adverse, in the immediate downstream reach, but with impacts diminishing downstream such that overall effects on biodiversity and other environmental features would be minor adverse. The EAR that we are currently developing will provide more information on these effects.</p> <p>As we stated in our earlier response to the issue of EAR timing, we have changed section 4.1 in our revised draft plan to show that this option is effectively a last resort measure.</p> <p>The response above also applies to this point.</p>

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NRW – SEA	<p>They welcome our intention to work with DCWW on the environmental monitoring, reporting and mitigation associated with potential DCWW River Wye drought orders. They also welcome our proposal for collaborative working in respect of potential cumulative effects of our drought options and DCWW options. They note the requirement for ‘appropriate assessment’ under the Conservation of Habitats and Species Regulations 2010 (as amended) for our existing abstraction licence/drought order. Without completing an appropriate assessment and EAR in advance of requiring a drought order/permit, it will make the application process much more difficult and is likely to cause delay to any determination process.</p> <p>24. Thames Water. They note that cumulative effects between Severn Trent Water drought options have only been considered in respect of Thames Water’s 2012 draft drought plan. They would like clarification as to whether we intend to consider potential cumulative effects in respect of options contained within Thames Water’s developing water resources management plan.</p> <p>25. Canal and River Trust drought plans They note and welcome the continuing discussions with the Canal and River Trust. They would like clarification as to whether these discussions are in the context of currently unlicensed abstractions.</p>	<p>We recognise the importance of completing the EAR and provision of information to NRW to complete an Appropriate Assessment and we are working in partnership with other companies and regulators to update the baseline environmental understanding through monitoring activities and preparing the assessments. We aim to complete our EAR as soon as possible and will be consulting with NRW on this assessment</p> <p>We assessed the cumulative effects of neighbouring water company Water Resources Management Plans as reported in Section 5.8 (see page 80 of the Environmental Report), as available at the time of preparing the Environmental Report. Depending on the Thames Water position on options affecting the River Severn following their WRMP consultation, we will consider this as part of our cumulative assessment in the EAR.</p> <p>The EAR work we are doing considers the (unlicensed) authorised abstractions by the Canal and River Trust.</p>

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NRW's separate response to the HRA that accompanied our draft drought plan	<p>The key point that they raised was the</p> <p><u>Timing of environmental assessment completion</u></p> <p>They recommend that we prepare EARs and appropriate assessments for River Severn at Trimpley and River Wye at Wyelands using available data and update when planned monitoring for baseline data is completed. Consultation with NRW should occur throughout this process.</p>	<p>We have already covered this issue in this statement of response. We have addressed it in relation to the first point the EA raised, when addressing NRW's recommendation 4 and in our response to NRW's SEA comments.</p>
	<p><u>Introduction</u></p> <p>They note that the HRA 'screening'/test of significance has been based on an initial 10km search radius but that potential effects from hydrological connectivity have been considered in the context of 20kms. They suggest that our report should make explicit that hydrological links may be both upstream and downstream. They are also concerned that 10km search areas may not necessarily account for those 'mobile species' which are 'features' of a European site but which may travel significant distances 'off site'.</p>	<p>The screening we did included upstream and downstream of the abstraction point and we will make this clearer in the final version of the HRA which we will issue with our final 2013 drought plan.</p> <p>Whilst a distance has been used to screen for sites and features, we have also considered mobile species in a wider context (for example, designated migratory fish species, bird species and bats). We refer to these species in the individual assessments but we will make this point clearer in the methodology section of our final HRA report.</p>
	<p>They also suggest, given the cross- border hydrological links of the draft drought plan and this assessment, it would be useful for a map to be provided indicating the location and context of options, the European sites potentially affected and additional information relating to the current licences.</p>	<p>We agree and we will produce a map indicating the location and context of the options for our final HRA report.</p>
	<p><u>Other clarifications in Annex A</u></p> <p><u>Assessment of drought options</u></p> <p>1. River Leam at Eathorpe/ River Avon at Stareton</p>	<p>Our assessment is in line with the conclusions of the EAR for this drought</p>

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NRW- HRA	<p>They note the presence of European Eel downstream of the abstraction points and our HRA's 'finding' that the impacts of the drought permit 'alone', are not considered likely to have a significant effect on the migratory fish species- including European Eel, designated under the Severn Estuary Ramsar site. See comments on Table 4.1.</p> <p>2. Option: River Severn at Trimpley They note the potential for the drought permit and/or drought order to impact on the qualifying species of the Severn Estuary SAC/SPA/Ramsar and support the intention to undertake further investigations (to be completed by Autumn 2013)</p> <p>3. Option: River Wye at Wyelands. They note and agree with this assessment's finding for a 'likely significant effect' on the integrity of the River Wye SAC and the requirement for this option, alone and 'in combination' to be subject to 'appropriate assessment'. They request clarification as to whether we consider potential 'in combination' effects likely in the context of other stressors and pressures including discharges and as a result of less dilution.</p> <p>They understand that we are collecting additional baseline monitoring data up to December 2014 to inform the EAR and appropriate assessment. In the meantime, they recommend that we carry out the environmental assessments based on existing baseline data to inform the final plan or as a minimum to inform a drought permit/order application. Once the additional baseline data is available they recommend that we update the EAR and appropriate assessment and review our drought plan and the associated SEA and HRA including the in-combination assessments. Without completing an appropriate assessment and EAR in advance of requiring a drought order/permit, it will make the application process much more difficult and is likely to cause delay</p>	<p>permit option which concluded that the operation of the drought permit is not likely impact migratory fish. We will include specific reference to Eel in the final HRA report.</p> <p>We have noted this.</p> <p>Once complete the outcome of the EAR will include an assessment of in combination effects arising from other pressures, including other abstractors and discharges. We can not prejudge what the results of this assessment will be.</p> <p>We have addressed this in our earlier responses relating to timescales for preparing an updated EAR and provision of the required information for NRW to complete an Appropriate Assessment. However, we note that we have committed to producing an updated environmental assessment with whatever data we have in the very unlikely event that we need to apply for a Wyelands drought order before we have completed this EAR.</p>

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NRW- HRA	<p>to the determination process.</p> <p>They suggest that we should not use the Habitats Directive Review of Consents work as a reason for delaying the production of the EAR and appropriate assessment, because it is unlikely that the licence changes will be implemented within the timeframe of this drought plan.</p> <p><u>In combination Screening.</u></p> <p>4. The HRA process requires consideration of likely significant effects 'in combination' with other plans and projects.</p> <p>They suggest that we have apparently only considered potential 'in combination' effects from other drought plans. They request further explanation and clarification of all those plans and projects considered within this 'in combination' effects screening.</p> <p>5. River Leam at Leamington plus River Avon at Stareton plus River Severn Drought Permit/Order at Trimpley. They note the potential for 'in combination effects' on the qualifying species of the Severn Estuary SAC/SPA/Ramsar and support our intention to undertake further investigations by autumn 2013.</p>	<p>See our earlier response on this matter.</p> <p>Our HRA has considered 'in combination' effects from other drought plans and water company water resource management plans. In accordance with HRA guidance, we have considered other plans and projects of relevance when undertaking the in combination effects with our drought options. These comprise our 2009 WRMP, other water company drought plans, EA drought plans and National Policy Statements. We do not consider other plans cited in the guidance relevant to a draft drought plan HRA screening (e.g. strategic policies and Local Development Plans) but we considered these in the HRA for our draft Water Resources Management Plan where these are of relevance.</p> <p>We will amend our final HRA report to provide further explanation of the approach to the cumulative assessment and the identification of relevant plans and projects which we have reviewed.</p> <p>We have noted this.</p>

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NRW- HRA	<p>6. River Leam at Leamington plus River Avon at Stareton plus River Wye at Wyelands They note the potential for 'in combination effects' on the qualifying species of the Severn Estuary SAC/SPA/Ramsar and support our intention to undertake further investigations, notably in the context of the potential impact of the River Wye at Wyelands drought order.</p> <p>7. River Severn at Trimpley plus River Wye at Wyelands They note the potential for 'in combination effects' on the qualifying species of the Severn Estuary SAC/SPA/Ramsar and support our intention to undertake further investigations, notably in the context of the potential impact of the River Wye at Wyelands drought order.</p> <p>8. River Wye at Wyelands drought order plus Dŵr Cymru potential River Wye drought orders. They agree in principle with this assessment processes' finding that appropriate assessment will be required in respect of potential 'in combination' effects on the Wye SAC. They request clarification as to whether we consider potential 'in combination' effects are likely in the context of other stressors and pressures including discharges and as a result of less dilution.</p> <p><u>In-combination effects assessments</u></p> <p>Once we have updated the EAR and appropriate assessment for the Trimpley and Wyelands drought orders, they recommend that we review our drought plan and the associated SEA and HRA including the in-combination assessments. They remind us of the importance of completing the outstanding work to assess 'in combination effects' for the HRA.</p>	<p>We have noted this.</p> <p>We have noted this.</p> <p>Once complete, the outcome of this EAR will include an assessment of in combination effects arising from other pressures, including other abstractors and discharges. We can not prejudge what the results of this assessment will be.</p> <p>The outcomes of the EARs and Appropriate Assessments will inform an update of our drought plan. We have committed to update our plan once we have finalised the Wye EAR. We will work with the EA, Natural England and NRW during this process.</p>

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Nottingham City Council	They sent Defra an email entitled 'WRMP consultation' with an attachment called 'ST Water Draft WRMP & Drought Plan consultation 25Jul13.doc'. This representation appears to only refer to our WRMP	We do not think that we need to change any documents as a result.
South Staffordshire Council	<p>They do not consider there to be any direct implications to them as the Local Planning Authority arising from our draft Drought Plan, and therefore support our plan.</p> <p>They welcome ongoing engagement with Severn Trent Water, particularly throughout their Site Allocations DPD process, which is set begin with an Infrastructure and Service providers consultation in August 2013.</p>	We have noted this point but do not think it means that we need to change any documents as a result.
Worcestershire County Council (Worcs. CC)	They commend our water efficiency work and welcome the opportunity to work with us to promote water efficiency in Worcestershire.	Our water efficiency team has contacted them about this and we are working together to help customers reduce consumption further.
	They state that a holistic approach to water management should be a common theme and starting point for developing our drought plan.	This is a similar point to the Natural England comment about dependencies between plans. To make it easier for readers to understand what the purpose of our different plans is we have added a table to section 7.4 and referred to this in section 1.3.
	They advocate that we work with local authorities at times of emerging drought.	We agree and this is why we included local authorities in the stakeholder list in section 5.2.
	They encourage the cross referencing of data and findings and expenditure for resolutions to address the risk of drought across the suite of plans and document.	We have added a table at the end of section 7.4 which shows the purpose of the other plans that we produce which relate to drought planning. We have referred to this table in section 1.3.
	They realise that we make no explicit allowance for climate change in our drought plan, as per the EA guidance. They argue that it is not possible to have effective planning for any type of climate phenomena without now considering climate change. They consider that the impact of climate change is being experienced now and that this means the planning can/should begin. They think that climate change should be part of a long term strategic consideration	This is a valid point and we think that accounting for climate change now and in the future is extremely important. Despite this we don't think that our drought plan is the place to address this. We think that this is why the EA guidance asks water companies not to account for it in drought plans. We have added some text in section 1.3 of our revised draft drought plan to refer to our 2010 climate change adaptation report. We have also considered climate change in detail in our dWRMP. This is in line with the latest water

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Worcs. CC	aligned to the WRMP and AMP.	resources planning guidelines (WRPGs).
	They would welcome consideration and support to promote the use of water storage reservoirs or grey water recycling to reduce the use of potable water.	We think there is a potential opportunity for rain water and grey water reuse to help manage demand for potable water. The key barrier to their wider use is cost. We are sponsoring a number of innovative research programmes and trials to help develop lower cost solutions to aid the future promotion of these types of systems to help reduce demand on potable supplies.
	They would welcome stronger support from STW when responding to developer enquires to advocate sustainable approaches to water management.	Sustainable management of water, both in terms of water use and management of waste water is important for Severn Trent Water. We are keen to work with developers and local authorities to see how we can work collaboratively on sustainable water management approaches for new and existing developments. An example of this is our work on urban catchments in Birmingham and Coventry where we are promoting sustainable approaches to water management in regeneration areas.
	They understand the benefits or logic of imposing restrictions within a recognisable boundary for ease of customer understanding, but think that this could have a negative perception for customers. They think this could put businesses “within Counties at a competitive disadvantage”.	We can understand the point that customers with restrictions could feel negatively if customers nearby do not have restrictions. However, this is also true if impose restrictions at a water resource zone or at a company wide level. It is almost inevitable that in any particular drought that there will be a boundary somewhere which divides customers with restrictions from those without. In response to the point about counties being at a competitive disadvantage, we aim to impose restrictions as infrequently as possible and when we do have to restrict use we aim to minimise the number of people that it affects. Any restriction could have an economic effect but we think that the approach that we propose minimises the effect on economic growth.
	They welcome consideration of how STW customers will share in the revenue benefits created from sharing this resource externally.	We spoke to Worcs. CC and explained that our customers already benefit from having the lowest combined bills in England and Wales. If we were to export more water to companies outside our region in the future we think that it will benefit both Severn Trent Water and our customers. In section 7.6 of our draft drought plan we provided a link to the following report which sets out our vision for how this may happen: <i>Severn Trent Water/ Ernst & Young, 2011, Changing course through water trading – How water trading can make a contribution to solving future water</i>

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Worcs. CC		<i>scarcity to the benefit of customers and the environment</i>
	They welcome references within the drought plan to private water supplies.	We have added a new section (numbered 5.2.1) to address this point.
	They welcome reference to different types of drought such as agricultural drought and meteorological droughts.	We have referred to different types of drought in our non technical summary.