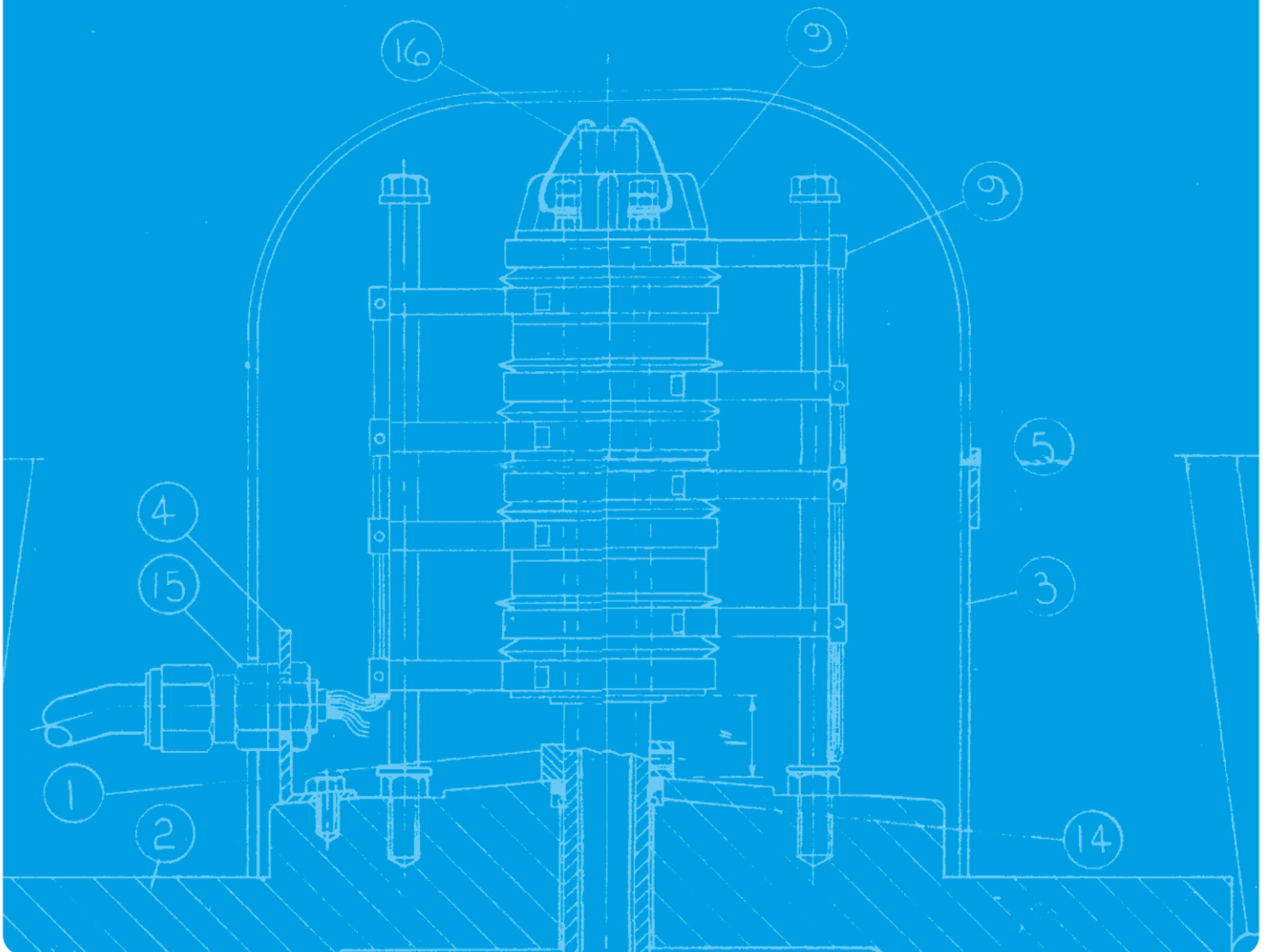


Changes to water abstraction licensing exemptions in Wales

Ken MacDonald (Severn Trent Water Ltd)
07/04/2016



Changes to water abstraction licensing exemptions in Wales

Thank you for the opportunity to comment on these changes. In summary, we:

- Do not object to the principle of bringing exempt abstractions into the licensing system
- However, we would like you to implement these changes in a way that does not threaten the security of supply and levels of resilience that our Welsh customers currently experience.

Operationally, we do not think that bringing our exempt abstractions into the licensing system will cause widespread or strategic supply / demand problems. This is because there is only one source in Wales that we are aware of that is currently exempt. We have shown this in the table below:

Name of abstraction	Type of abstraction	Water Resource Zone
Llanwrin	Groundwater source	Llandinam WRZ

We are unclear whether this abstraction will remain exempt due to it being in a minor aquifer and arguably 'low risk'. If it remains exempt then we have no further comments to make.

If this source does require a licence then we request that the licence does not threaten the security of supply and local resilience standards that our customers in that part of Wales currently experience.

We request that, if the current exemption for this source is removed, you allow us to carry out a detailed analysis of the potential impact that it could have. Until we have done this analysis we cannot rule out any negative impacts that these changes might pose for our customers. If you, or Natural Resources Wales (NRW), think there are other Severn Trent abstractions that will lose their current exemptions then we request an opportunity to carry out this analysis for them as well. We look forward to working collaboratively to devise licences that proportionately protect our customers' interests and those of the natural environment.