



## Statement of Response

Version: 1.0

## Introduction

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As part of the statutory process for water company drought plans, Veolia Water Projects Limited (VWPL) has carried out a public consultation for the 2021 VWPL draft Drought Plan.

VWPL published its 2021 draft Drought Plan for consultation on June 10th after receiving authorisation from DEFRA. The 2021 VWPL draft Drought Plan was made available on the company website along with the details about how to submit a response and individual notification letters were sent to key stakeholders. The consultation ran for seven weeks ending July 30th.

VWPL directly received two written representations: one from the Environment Agency and one from Natural England. No further representations were forwarded from Defra.

This document is the Statement of Response of VWPL to the representations received during this consultation process. It provides answers to the recommendations raised by the consultees and information on how VWPL updated (or will be updating) the Drought Plan accordingly.

Following publication of this Statement of Response, VWPL will submit an updated version of its Drought Plan to the Secretary of State who will assess whether the comments received have been satisfactorily addressed, and the Drought Plan complies with relevant legislation and technical guidelines. Once satisfied, the Secretary of State will approve the plan and authorise VWPL to publish it as final.

## Representation & VWPL Responses

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### 1.1. NATURAL ENGLAND (NE) REPRESENTATION

Natural England's advice on our draft Drought Plan is summarised as:

- VWPL draft Drought Plan (dDP) has not been considered under the Conservation of Habitats and Species 2017 Regulations as amended, known as a Habitats Regulations Assessment (HRA).
- Natural England advises that there is the potential for a likely significant effect on the River Avon SAC from the proposed Level 2 and 3 elements of the dDP and that an appropriate assessment is required. So an HRA must be completed before the final plan is published.
- VWPL dDP has not been considered under the UK legislation by The Environmental Assessment of Plans and Programmes Regulations 2004 SI No.1633 (Strategic Environmental Assessment (SEA) process).
- Natural England advises that, in addition to the potential for likely significant effect on the River Avon SAC, there is also the potential for likely significant negative effects on Salisbury Plain, the River Avon System and Porton Meadows SSSIs. So an SEA should be completed before the final drought plan is published.
- VWPL dDP has not been assessed for the potential for net gain in biodiversity. The dDP is unlikely to result in a net gain in biodiversity.
- The natural capital of the dDP options has not been assessed. The dDP is unlikely to result in enhanced natural capital.

#### VWPL's response:

As discussed with Natural England, under its Drought Plan VWPL will continue to operate within the permitted limits of its EA abstraction licence. So, the Environment Agency advised that an environmental assessment (such as SEA/HRA) is not required.

However, if upon the completion of the additional modelling work requested by the EA on the vulnerability assessment of Tidworth sources (*see EA representation - recommendation 1*), it was identified that VWPL would need to apply for drought order/permits, VWPL would revise its dDP accordingly and carry out any relevant environmental assessment accordingly.

Also, as mentioned to Natural England, VWPL is currently reassessing the impact of its abstraction on river flows (including the River Avon) as part of its AMP7 investigation. The outcomes of this work will inform any future environmental assessment (if required).

## 1.2. ENVIRONMENT AGENCY REPRESENTATION

The Environment Agency (EA) stated that VWPL has not presented enough evidence in its draft plan to demonstrate compliance with all Directions and requested VWPL to provide more evidence to show how it complies with the following:

- (c) how the sequencing of measures has been designed to limit impacts on customers and the environment - see recommendation 2
- (d) the magnitude and duration of the drought scenarios against which the drought plan has been tested to provide security of supply - see recommendation 1
- (g) the measures that will be used to monitor, prevent and mitigate any adverse effect on the environment resulting from the implementation of drought management measures - see recommendation 3

The EA also suggested two improvements in addition to their key recommendations:

### **Recommendation 1 – confirm the drought vulnerability assessment and triggers after completing the groundwater modelling work (linked to Direction 3 (d))**

The company has not completed the groundwater modelling needed to support the triggers and actions it plans to use during a drought. As a result, we do not have certainty that its plan will work appropriately to maintain security of supply for its customers and protect the environment during a drought. The company must complete this groundwater modelling to provide confidence that its plan will work effectively during a drought.

The groundwater modelling assessment also informs other areas of the company's plan, such as the appropriateness of its chosen drought triggers and whether there is a need for further drought management measures. This also means it is unclear if the company needs any drought permits or orders in the future.

The company must engage with the Environment Agency to discuss and agree a programme of work for completing the groundwater modelling work and include this in its statement of response. The groundwater modelling assessment underpins the company's plan and, if it is not possible to complete this work in time for publishing its final plan, the company must commit to a further review and update of its plan once the results are available.

We recommend the company completes the groundwater modelling to assess the effect on the following parts of the plan and update accordingly:

- vulnerability assessment to help it explain how it has planned its triggers and actions, together with the timing
- appropriateness of chosen drought triggers and actions, together with the timing and sequence of the drought measures
- testing of drought triggers and their effectiveness under a range of drought scenarios

### **VWPL's response:**

Over the past two months, VWPL has engaged with the EA to confirm and agree the scope of the additional groundwater modelling work required to provide confidence that VWPL's plan will work effectively during a drought. This includes:

- Confirming the vulnerability assessment of Tidworth sources presented in VWPL 2019 Water Resource Management Plan (Annex 2 - Resilience)
  - a. Reviewing groundwater levels at the three abstraction sources in different drought scenarios (1920/1922 Drought, 1974/1977 Drought and simulated 1:500) using the Wessex Basin Groundwater model. *Work started and to be completed by the end of September 2021.*
  - b. Comparing those groundwater levels to the specifications of the abstraction boreholes. *Data collection started, work to be completed in October 2021.*
  - c. Confirming the physical abstraction capacity of the sites at those groundwater levels considering the borehole wells' infrastructure and pumping arrangements. *Work to be completed by the end of December 2021.*
- Confirming/reviewing the drought triggers and supply actions based on the outcomes of the revised vulnerability assessment and updating the Drought Plan accordingly - *Work to be completed prior to the issue of 2022 VWPL final Drought Plan*

VWPL will ensure that the EA receives regular progress updates on this work scheme.

**Recommendation 2 – clarify the sequence and timing of triggers and drought management measures so they are clear and consistent to the customers (linked to Direction 3 (c))**

The sequence of the company's drought triggers and drought management actions is not correct. This does not align with the Direction or the water company drought plan guideline (see section 4.4).

The company has also not included extreme drought management actions in its plan before it gets to level 4 restrictions. It must include all possible actions in level 3 to avoid the use of emergency drought orders in level 4.

We recommend the company amends its plan to include:

- an appropriate sequence of drought triggers and drought management measures
- some extreme drought management actions to use before it has to use level 4 drought actions
- an explanation of how customer demand will change during a drought and the communication that would be needed around this
- correction to the drought management actions used in figure 3 at level 3 and 4

**VWPL's response:**

VWPL met with the EA to clarify the expectations on drought actions at each level of the Drought. It was confirmed that:

- On the demand side actions: Temporary Use Bans (TUBs) are to be applied at Level 2, Non-Essential Use Bans (NEUBs) at Level 3
- On the supply side actions: tankering/standpipes are to be applied at Level 4 and other measures such as lowering pumps, reducing the Leckford Bridge transfer etc. at Level 3.

*Relevant sections of the Draft drought Plan have been revised accordingly (changes have been highlighted in yellow).*

With regards to changes to customer demand during a drought, VWPL confirms that a reduction of customer demand by the implementation of the demand drought actions is anticipated. However VWPL has set the customer demand trigger at 8.4 Ml/d for all drought levels, to ensure that the worst case scenario (i.e. no significant reduction in demand) is considered when assessing the required supply side actions.

*VWPL has amended the drought triggers to take into account the anticipated reduction of the customer demand(changes have been highlighted in yellow).*

**Recommendation 3 – provide more detail to be able to adequately assess, monitor and mitigate for any environmental impact of abstraction increases to manage a drought (linked to Direction 3 (g))**

The company has not provided enough detail on its environmental assessment and monitoring plans. It has not been possible for the Environment Agency to assess what environmental impact there would be on the Nine Mile River from any abstraction increases needed during a drought. This links to Recommendation 1, as the company's incomplete groundwater modelling means it has not yet been able to assess the need for drought supply options and the potential requirement for any environmental assessments.

We recommend the company amends its plan to include further information and clarity on the following:

- how it will use the Tidworth and Chalk pit boreholes during current operation and drought to understand the environmental impact on Nine Mile River
- how it will use the data it gathers on this site to inform its decision on what to do around any potential environmental impacts

**VWPL's response:**

VWPL met with the EA and confirmed that this recommendation was raised on the basis that the outcomes of the work being carried out under Recommendation 1 may highlight the requirement for drought order/permit hence for environmental assessment.

However, as part of the AMP7 Investigation and the MOD application for new abstraction licences, VWPL, Wessex Water and the MOD have been working on assessing the impact of abstraction activities on rivers flows - more specifically the impact of VWPL abstractions on the Nine Mile River, the River Bourne and Pillhill Brook. The modelling work is due to be completed in October 2021 and includes modeling operating scenarios similar to Level 2 and 3 supply actions of the current VWPL Draft drought plan - i.e abstraction at full licence for Tidworth and Chalkpit and abstraction at full licence for Tidworth only (chalkpit off).

Based on the outcomes of the modelling work VWPL will review the ecological impact using historical or current datasets available and establish a monitoring plan (if required).

*VWPL will continue to have regular progress update meetings on this work scheme over the coming months and will aim to include the main findings in the final Drought Plan.*

**Recommendation 4 – confirm Leckford Bridge bulk supply agreement with Wessex Water and make sure it is consistent**

The bulk supply agreement for the Leckford Bridge transfer between VWPL and Wessex Water still seems to be inconsistent between each of their draft drought plans. The final agreement on the bulk supply transfer between VWPL Projects and Wessex Water must be confirmed. The water companies must clarify these arrangements through joint communications and update the agreements in their respective drought plans.

We recommend the company amends its plan to include further information and clarity on the following in time for its statement of response:

- the bulk supply agreement with Wessex Water, a final agreement on this bulk supply needs to be made for both final plans
- the final agreement must show how it will share water resources with Wessex Water during a drought and how it will operate its sources to benefit Wessex Water while minimising any risk to its own supplies

**VWPL's response:**

VWPL confirms that VWPL and Wessex Water aim to finalise the Leckford Bridge Bulk Supply Agreement prior to issuing their final Drought Plan. However, it is worth noting that VWPL and Wessex Water do not anticipate any significant changes on the agreed maximum export flow nor on the communication protocol during drought events.

Also, Wessex Water is aware and supportive of the additional modelling work being carried out by VWPL under Recommendation 1 to confirm the resilience of Tidworth sources; VWPL has committed to share the outcomes of this work with them.

Wessex Water and VWPL are conscious of the risk to all abstraction licences in the area arising from the AMP7 investigation and the need to licence the MOD sources.

*VWPL will ensure that any relevant changes are made to the final Drought Plan once the bulk supply agreement is signed.*

**Improvement 1 – provide more detail on communication with regional groups and joint communication/coordination with Wessex Water**

The company has not provided sufficient detail on how it will coordinate its communication with regional groups. It should include information in its plan on any joint communication with Wessex Water and, if appropriate, regional groups regarding its water efficiency measures, Temporary Use Bans and Non-Essential Use Bans.

The company includes information on key stakeholders and communication in table 4 of its draft plan which is very helpful. In addition to this, it should amend its plan to include further information and clarity on:

- how it will provide consistent, transparent and coordinated joint communication with its customers, especially around the implementation of demand measures
- the timetabling and communication on joint restrictions with Wessex Water
- its customer communication regarding its bulk supply transfers with Wessex Water so this is consistent

### **VWPL's response:**

VWPL confirms that it will engage with the Regional Group (and more specifically with Wessex Water) to ensure a consistent approach to customer communication and water efficiency actions across the area during a Drought.

*Relevant sections of the Draft drought Plan have been revised accordingly (changes have been highlighted in yellow).*

### **Improvement 2 - make the plan tactical and operational**

The draft plan is currently missing some information it needs to make sure it is a really effective tactical plan in a drought. The company should consider further opportunities to improve the clarity of the document and make it easier to follow. This should ensure that the plan can be easily understood and followed by people including customers, regulators and interested groups.

In particular, the company should make amendments to the drought triggers and appropriate drought actions so it is clear to its customers and other stakeholders what actions it will be taking at each stage of a drought or extreme event.

### **VWPL's response:**

*When preparing its final Drought Plan, VWPL will aim to ensure that it is clear and easy to follow for customers and key stakeholders - making the relevant amendments to the Drought triggers, Drought actions and Communication sections*

VWPL would like to thank all consultees for their responses to its 2021 draft Drought Plan.