



Dŵr Cymru Welsh Water

Drought Plan SEA Post Adoption Statement

Final Report

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1 INTRODUCTION

1.1 BACKGROUND TO THE DROUGHT PLAN

Water companies in England and Wales are required to prepare and maintain Statutory Drought Plans under Sections 39B and 39C of the Water Industry Act 1991, as amended by the Water Act 2003 and the Water Act 2014. The Water Industry Act 1991 defines a Drought Plan as ‘*a plan for how the water undertaker will continue, during a period of drought, to discharge its duties to supply adequate quantities of wholesome water, with as little recourse as reasonably possible to drought orders or drought permits*’.

The Drought Plan builds on earlier Draft Drought Plans that have been developed by Dŵr Cymru Welsh Water (DCWW). DCWW have made several changes and improvements to the Drought Plan over time to reflect changes that have occurred to the drought planning legal and regulatory framework, and to comply with the latest Environment Agency Drought Plan Guideline (DPG)¹. Key changes made within the 2014 Draft Drought Plan include:

- The introduction of Temporary Use Restrictions (TUBs) enabling water companies to impose temporary water use restrictions without a drought order. These were previously known as, and replace, “hose pipe bans”. The Drought Plan sets out how DCWW intend to use these new powers and what it means for customers.
- The implementation of extensive scenario testing on Drought Plan proposals to demonstrate that drought triggers and actions are realistic and manageable.
- Improving and expanding the communications strategy that will be used during a drought, and clearly setting out the management structure that will be adopted in response to a drought situation.
- Maintaining an ongoing environmental monitoring programme to continue the development of Environmental Assessment Reports to support drought order and drought permit applications.

Following consultation on the Draft Drought Plan, a Final Drought Plan has been produced. The main areas where the Final Plan has been updated from the Draft Plan are:

- Further information included within Chapter 4, Environmental Monitoring and Assessment, which more fully outlines DCWW’s commitment to environmental

¹ Environment Agency (2011) Water Company Drought Plan Guideline. June 2011.

monitoring investigations and production of Environmental Assessment Reports during AMP6 (Asset Management Plan No 6, 2015-20).

- DCWW's supply side drought actions have been reviewed to ensure that all those presented in the Drought Plan are able to be implemented in the timeframes required for drought management.
- Further details of DCWW reasoning and customer support for the Temporary Use Ban (TUB) implementation strategy.
- Further details provided within the Plan to fully demonstrate that the plan is compliant with Section 4 of the Drought Plan Directions 2011.

1.2 THE SEA PROCESS

The Drought Plan has been subject to SEA in compliance with the SEA Directive², as transposed in Wales by the SEA Regulations³. This SEA Post Adoption Statement is produced in accordance with the provisions of Part 4, Regulation 16 of the SEA Regulations (see **Appendix A**).

An SEA Scoping Report was issued for consultation to the statutory consultees in August 2013 and an Environmental Report was produced with the Draft Drought Plan. Habitats Regulations Assessment (HRA) Screening was also undertaken concurrently with the SEA, and informed the assessments documented in the Environmental Report.

DCWW published their Draft Drought Plan for public consultation on 5 September 2014. The SEA Environmental Report and the HRA Screening Report were published alongside the Draft Drought Plan as required by the SEA Regulations⁴.

1.3 PURPOSE OF THE SEA POST ADOPTION STATEMENT

In accordance with the SEA Regulations and following guidance for undertaking SEA of Drought Plans which has been produced on behalf of United Kingdom Water Industry Research (UKWIR)⁵, this SEA Post Adoption Statement describes:

- How environmental considerations have been integrated into the Final Drought Plan (Section 2).
- How the Environmental Report has been taken into account (Section 3).

² Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment

³ The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (S.I. 2004/1656 (W/170)) ("the Wales Regulations").

⁴ The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (S.I. 2004/1656 (W/170)) ("the Wales Regulations").

⁵ UKWIR (2012) Strategic Environmental Assessment and Habitats Regulations Assessment - Guidance for Water Resources Management Plans and Drought Plans. Report Ref. No. 12/WR/02/7. UKWIR. London

- How responses to consultation have been taken into account (Section 4).
- Reasons for choosing the Final Drought Plan as adopted, and why other reasonable alternatives were rejected (Section 3).
- The measures that are to be taken to monitor the significant environmental effects of implementation of the Final Drought Plan (Section 5).

In addition, information on how to view a copy of the Final Drought Plan and supporting documents is given in Section 6.

2 HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE FINAL DROUGHT PLAN

The Environment Agency DPG⁶ states that: *a Drought Plan should set out the short-term operational steps a company will take before, during and after a drought. These plans are not strategic and should focus on a company's actions if a drought was to occur under present circumstances. Drought plans should show how a company would operate in a range of droughts and present enough information to customers and partners to show what decision making processes a company will make in a drought event.*

Environmental considerations were incorporated into the development of DCWW's Drought Plan from the outset. DCWW have undertaken a significant amount of drought environmental monitoring and assessment studies in advance of preparation of the Drought Plan. This includes preparation of Environmental Monitoring Plans (EMPs) for 41 drought options, environmental monitoring (including hydrology, water quality and ecological monitoring) and preparation of Environmental Assessment Reports at several of the drought permit/order sites which are considered to be more likely to be implemented in a future drought event. These studies were undertaken in consultation with Natural Resources Wales (NRW) and the Environment Agency. Information from these drought option studies was used to inform the SEA and HRA.

The SEA reviewed all the environmental and social effects of the range of drought options included in DCWW's Draft Drought Plan.

Because of the nature of the consenting system for drought actions, a Drought Plan must include all measures that the company may progressively need to take as the severity of a drought increases, including those that would only be needed in the worst possible drought. These will typically have very significant environmental effects, but are extremely unlikely to be required in the period of the plan. As a result, Drought Plans in general encompass a basket of measures that will only be implemented if and when required because of the unpredictable occurrence of a drought event, and thus the actual impact of the plan over its life is subject to significant uncertainties. DCWW's Drought Plan, therefore, includes a range of possible measures to allow DCWW to respond to a particular drought in the most appropriate way.

As a result of the differing nature of droughts and differing response of the range of available water sources to the characteristics of an ensuing drought, it is impossible to predict in advance which and how many of the measures will be required. However,

⁶ Environment Agency (2011) Water Company Drought Plan Guideline. June 2011.

there are a number of factors that help inform the anticipated priority of selection. For example, the potential for increased resource availability, raw water quality, network capability and likely environmental effects are taken into consideration.

The outputs of the SEA provided a comparative assessment of the environmental effects of implementing each drought option, which was used by DCWW, along with operational factors, in determining the selection of options to include in the Final Drought Plan, and in the event of a future drought, will be used to inform the priority of implementation of each option within each Water Resource Zone (WRZ).

The SEA considered a wider range of impacts for the environmental assessment of each drought permit/order, e.g. potential cumulative effects with other drought permits/orders and other plans and programmes⁷. Therefore, in the event of a drought, the SEA provides an additional information source and a comparative assessment of the environmental effects of implementing each drought option, including the potential for cumulative effects. DCWW uses this information, along with operational considerations, to define which options are to be implemented in a drought.

Consultation with NRW and the Environment Agency has been undertaken throughout the Drought Plan preparation process. Where environmental considerations have been raised by NRW and the Environment Agency, these have been considered and addressed and helped to iterate the Drought Plan. Consultation is discussed further in Section 4.

⁷ Schedule 2 of the SEA Regulations (Annex I of the Directive) requires the Environmental Report to include information on ‘the likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects...’

3 HOW THE ENVIRONMENTAL REPORT INFLUENCED THE DROUGHT PLAN

3.1 CHANGES TO THE DROUGHT PLAN

The SEA Environmental Report highlighted the relative environmental and social effects of all of the DCWW Drought Plan management options. The SEA findings supported the ordering of the demand management options presented in the Final Drought Plan, which ensures that those options with the greatest impact on customers and socio-economics are only implemented during a very extreme drought event. These SEA findings were incorporated into the Final Drought Plan.

The SEA has also informed the detailed descriptions of the options and summaries of the environmental impacts of implementation, which are provided by WRZ in Appendix 1 to the Drought Plan. These will be used, together with operational considerations, to assist in assigning priority levels to the options for implementation in a drought. It has also helped to define mitigation and monitoring requirements included in the Final Drought Plan.

3.2 REASONS FOR CHOOSING THE DROUGHT PLAN OPTIONS

As stated in Section 2 and 3.1, the Drought Plan does not define specific alternative programmes of measures which the SEA findings can influence, i.e. to help select a “preferred plan” (as is the case, for example, with Water Resource Management Plans). However, information from the SEA Environmental Report, the HRA Screening Report and other environmental studies, including Environmental Assessment Reports will assist decisions by DCWW as to the likely ordering and timing of implementation of the various drought plan options. For options which are included in the Final Drought Plan, information from the environmental assessments has been incorporated into the Drought Plan drought option form tables (Appendix 1 of the Final Drought Plan) and will be used, together with operational considerations, to assist in assigning priority levels to the options for implementation in a drought.

4 CONSULTATION AND UPDATES SINCE THE DRAFT DROUGHT PLAN

4.1 CONSULTATION ON THE SEA

The SEA Regulations require consultation at the scoping stage and on the assessments as documented in the Environmental Report. Consultation with the statutory bodies defined by the Regulations is mandatory at both stages. Consultation with the public is only mandatory at the Environmental Report stage.

The SEA process comprised the following:

- An SEA Scoping Report was issued in August 2013 to statutory consultees and opinions were sought on the proposed scope and level of detail proposed for the SEA.
- The SEA Environmental Report was published with the Draft Drought Plan on DCWW's website on 5 September 2014 for both statutory and public consultation. A draft HRA Screening Report was published at the same time.
- A Statement of Response (SoR), including responses to comments on the SEA Environmental Report and the HRA Screening Report, was published on DCWW's website on 19 December 2014.
- The SEA Environmental Report and SEA Post Adoption Statement were published with the Final Drought Plan on DCWW's website in August 2015. A Final HRA Screening Report was published at the same time.

Changes to the Drought Plan made as a result of consultation are described in the SoR. Changes to the SEA made as a result of consultation are discussed in Section 4.2.

4.2 CONSULTATION RESPONSES ON THE DRAFT DROUGHT PLAN SEA ENVIRONMENTAL REPORT

The Draft Drought Plan consultation period lasted for 8 weeks and closed on 31 October 2014. Three representations were received from: NRW; Consumer Council for Water; and the Environment Agency. These are set out in the SoR to the Drought Plan consultation which describes how these representations have been taken into account and the amendments to the Drought Plan made as a result. However, only NRW made representations that relate to the SEA Environmental Report.

Table B1 in **Appendix B** lists the responses NRW made to the consultation on the Draft Drought Plan which relate to the SEA. These responses are included in the

Statement of Response published on DCWW's website:

<http://www.dwrcymru.co.uk/en/Environment/Water-Resources/Drought-Plan.aspx>

5 MONITORING OF THE DROUGHT PLAN

The SEA Directive requires the significant environmental effects of implementing a plan to be monitored. As discussed in Section 2, water companies are already required to assess the environmental impacts of drought order/permit drought measures included in a Drought Plan. The Water Industry Act (WIA) and the Drought Plan Direction 2011 require that water companies include in their Drought Plan a statement of how they will monitor the effects of the drought and of measures included in the Drought Plan (the Environmental Monitoring Plan (EMP)). This requirement is explained in the DPG, Section 7.2, which states: *‘Companies should ensure that adequate arrangements for environmental monitoring are detailed in an environmental monitoring plan within its drought plan.’* The DPG explains the function of monitoring before, during and after a drought, which includes the triggering of mitigation measures.

DCWW have undertaken a significant amount of drought environmental monitoring and assessment studies in advance of preparation of the Drought Plan. This includes preparation of EMPs for 41 drought options, environmental monitoring (including hydrology, water quality and ecological monitoring) and the preparation of Environmental Assessment Reports at several of the drought permit/order sites which are considered to be more likely to be implemented in a future drought event. These studies were undertaken in consultation with NRW and the Environment Agency. DCWW have committed to complete Environmental Assessment Reports and associated EMPs for all of the drought permit/ order options listed within the Drought Plan in preparation for the next revision of the Drought Plan, which is anticipated to be in 2020.

As described in the Final Drought Plan, in the event of a drought requiring the application for drought powers, existing ‘shelf-copy’ EARs (where they exist) would be updated to support an application to the Welsh Minsters/Secretary of State for a drought order or NRW/Environment Agency for a drought permit. In the event of a drought event in 2015-2016 which requires applications for drought permits/orders, DCWW would prepare compliant application ready EARs to support the applications in consultation with NRW and the Environment Agency. The EARs would include an EMP.

EMPs are only developed for drought options that require a drought order/permit application, and therefore, do not include monitoring for significant effects identified by the SEA with respect to demand side drought options or supply side drought options that do not require a change of licence. Furthermore, the scope of the Environmental Assessment Reports and related EMPs (as prescribed by the DPG) does not cover all the potential significant effects identified by the SEA, for example significant effects

identified under the SEA topics 'Resource use' and 'Climate Change', but concentrates on the direct and indirect impacts of the drought option being considered.

With respect to the impacts identified in the SEA that are not covered by Environmental Assessment Reports and associated EMPs, many company level impacts, such as carbon emissions, are monitored and reported annually by DCWW. A substantial amount of relevant information is also collated by central and local government and NRW which can be used alongside the information gained through the EMPs.

As identified in the SEA Environmental Report, monitoring, or relevant routinely monitored data, should be focussed on:

- Significant effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused; and
- Significant effects where there was uncertainty in the SEA and where monitoring would enable preventative or mitigation measures to be undertaken.

DCWW will take a broad view of the findings of their ongoing monitoring processes to identify whether the Drought Plan has any significant unforeseen effects. Where these are identified, specific monitoring may be considered to determine how best to mitigate or avoid the adverse consequences.

Indicators currently monitored and how they relate to the objectives considered in the SEA of the Drought Plan were presented in the SEA Environmental Report⁸, which is reproduced in **Table 5.1** below.

⁸ Dŵr Cymru Welsh Water (2014) – *Strategic Environmental Assessment of Draft Drought Plan: Environmental Report*. Report by Amec Environment and Infrastructure UK Ltd. August 2014.

Table 5.1 DCWW Potential Indicators for Monitoring Effects

Objective	Indicator	Source of Information	Commentary
1. To protect and enhance biodiversity (habitats, species and ecosystems) working within environmental capacities and limits.	Condition of specific protected sites (e.g. SACs and SPAs)	Natural Resources Wales/Natural England	Open communication between Natural Resources Wales/Natural England and Welsh Water results in up-to-date information and identification of any potential issues.
	Biological monitoring (macroinvertebrates, macrophytes, fisheries, Bird surveys)	Natural Resources Wales, Environment Agency, Welsh Water, Angling clubs, British Trust for Ornithology	Using these data sets and comparing them against other monitored information such as levels and flows will assist in identifying whether there are any adverse effects and if mitigation measures are performing as well as expected.
2. To protect and enhance water quantity and the quality of surface, groundwater, estuarine and coastal water and help achieve the objectives of the Water Framework Directive	River flow and level characteristics	Welsh Water, Natural Resources Wales, Environment Agency	Monitoring can be compared to historic records.
	River flows, river levels, lake and reservoir levels. Water quality of surface waters.	Welsh Water, Natural Resources Wales, Environment Agency	At sensitive sites previous studies should be used to inform monitoring and assessment. For example RoC documentation data, and any Drought Permit (DP) Environmental Assessments and associated environmental monitoring plans.
	Groundwater levels, recharge characteristics and abstracted groundwater quality	Welsh Water, Natural Resources Wales, Environment Agency	At sensitive sites previous studies should be used to inform monitoring and assessment. For example RoC data, documentation and any Drought Permit (DP) Environmental Assessments and associated environmental monitoring plans.
	Leakage	Welsh Water	Welsh Water report these data to Ofwat and the Environment Agency as part of the annual returns process.
3. To protect and enhance soils and contribute to the sustainable use of land	Water saved through demand management/ water efficiency measures	Welsh Water	Welsh Water report these data to Ofwat and the Environment Agency as part of the annual returns process.
	Area of previously undeveloped land used during construction	Welsh Water	Welsh Water could record the area of previously undeveloped land that is built on as a result of the Drought Plan measures.
4. To limit the causes and effects of climate change and the enhancement of adaptation	Quantity of greenhouse gas emissions per megalitre of water supplied.	Welsh Water	Welsh Water can use company data, and guidance from the UKWIR greenhouse gas workbook and Defra conversion factors to derive this information
	Energy use used in the operational phase of water treatment and supply.	Welsh Water	
	Renewable energy generated; renewable energy purchased.	Welsh Water	
5. To protect and enhance landscape character and other protected features	Loss or damage to landscape character and features of designated sites.	Welsh Water	Welsh Water could record the number and floorspace of new buildings that are built within designated landscape sites.
6. To protect and enhance human health with special regard to vulnerable groups in society	Compliance with drinking water standards at customers' taps (%).	Welsh Water	Welsh Water report these data to the Drinking Water Inspectorate.
	Compliance with water quality standards under the EC Bathing Waters Directive.	Natural Resources Wales, Environment Agency	Natural Resources Wales and the Environment Agency monitor the compliance of bathing waters and report this annually.
7. To maintain and enhance the economic and social needs of the local community	Number of Welsh Water sites with public access which provide sporting, recreational and leisure resources and number of visits per year.	Welsh Water	Welsh Water hold information on the number of annual visitors to sites where specific visitor facilities are provided (e.g. Llyn Brenig). These could be analysed to determine effects of drought operation on visitor use.
8. To promote the wise use of resources	Amount of primary and recycled aggregates used.	Welsh Water (contractors/consultants)	Information on aggregate use and recycling should be held by Construction managers and accounts (contractors / consultants accounts, waste or procurement records)
	Chemicals Use in Water Supply	Welsh Water (services data)	Information on chemical use should be held in accounts.

6 AVAILABILITY OF DOCUMENTS

The adopted Final Drought Plan and accompanying SEA documentation is available on DCWW's website at:

<http://www.dwrcymru.co.uk/en/Environment/Water-Resources/Drought-Plan.aspx>

The documents are also available for inspection at DCWW's offices in Nelson, Treharris. To arrange an appointment or request copies of the Drought Plan or associated documentation please contact us by:

- Email to: Water.Resources@dwrcymru.com or
- In writing to:
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APPENDIX A

SEA POST ADOPTION PROCEDURES

Part 4, Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires DCWW, 'as soon as is reasonably practicable' after the adoption of the Drought Plan, to:

1. Make a copy of the Final Drought Plan and SEA Environmental Report available at its principal office for inspection by the public at all reasonable times and free of charge;
2. Notify the public and potentially affected parties of their availability;
3. Inform the statutory consultees and other parties who responded;
4. Issue a statement containing:
 - how environmental considerations have been integrated into the Drought Plan;
 - how the environmental report has been taken into account;
 - how consultation responses have been taken into account;
 - the reasons for choosing the Drought Plan as adopted;
 - measures to monitor the significant environmental effects of the Drought Plan.

Requirements 1 to 3 have been fulfilled by the publication of the Final Drought Plan and SEA documents on DCWW's website, and informing all consultees of the publication.

The publication of this SEA Post Adoption Statement fulfils Requirement 4.

APPENDIX B

SUMMARY OF REPRESENTATIONS THAT RELATE TO THE SEA, RESPONSES IN THE STATEMENT OF RESPONSE, AND CHANGES MADE

DCWW published its Draft Drought Plan on 5 September 2014 for public consultation and received a number of responses during the consultation period, which ran until 31 October 2014. DCWW then prepared a SoR setting out how representations have been taken into account and the amendments to the Drought Plan made as a result.

Summary of the representations that relate to the SEA and the resulting changes as set out in the SoR are listed in **Table B1**.

Table B1 Summary of representations that relate to the SEA, responses in the SoR, and changes made

Section	Comments by	Issue	Response
	Natural Resources Wales	<u>Ecosystem Services</u> . We understand the difficulties in incorporating the ecosystems approach into an already established assessment and accept that this does not undermine the validity of the report itself, it does represent a missed opportunity to apply this developing methodology at the strategic level. We would anticipate the more detailed site specific environmental reports to adopt this approach as well as any assessments of future iterations of the Drought Plan itself.	We will take into account the use of the ecosystems approach when reviewing and developing our EMP's and EAR's.
	Natural Resources Wales	<u>Demand side option assessment</u> . We note that demand side options have not been individually assessed and accept the justification that it is difficult to ascribe clear spatial effects to them. We welcome, therefore, the 3 'generic' assessments that have been produced to inform the ER but we note that 'nonessential use bans' have been omitted from the assessment and feel that they should have been included for completeness.	We will review the assessment to determine if it is appropriate to also include non-essential use bans and amend the SEA as appropriate.
	Natural Resources Wales	<u>Definitions of Significance</u> . We acknowledge the difficulties in defining meaningful quantitative thresholds for significance and we largely agree with the definitions adopted in this assessment and how they are applied in the specific options assessments. However, it can appear as though there are inconsistencies between options/sites. To some extent this is inevitable, but we recommend that additional clarification is provided, perhaps in the form of examples referencing the individual Environmental Assessment and Environmental Monitoring Plans (completed to date) for the draft drought plan, to help explain why some options are deemed as	We will review the SEA in the light of this comment and add further clarification as required.

		potentially 'significant' on some sites and not at others.	
3.5	Natural Resources Wales	<p><u>Difficulties Encountered (section 3.5, pp 72&73)</u>: We note and accept the limitations associated with carrying out an assessment such as this but we have a number of concerns relating to the use of the Environmental Assessment, Environmental Monitoring Plans (EMP) and, for low risk sites, the Appendix G forms. While we accept that the EMPs are not Environmental Reports in themselves, they do effectively act in this role and contain much of the information necessary for assessing Drought Orders/Permits. Therefore, they perform a key role in the assessment process (both for SEA and HRA). The Environment report does acknowledge this to some extent but it also need to make clear that they are still a 'work in progress' and need either completion or updating. We would also welcome reassurance that all the Environmental Assessment, EMPs and here appropriate appendix G forms, will be produced and/or updated in time for the next iteration of the Drought Plan and that our previous comments on the draft reports produced since 2007 have been incorporated into the final reports being produced. Finally, given the importance of these to understanding the detailed assessments, they should be made available on request.</p>	<p>We are committed to preparing Environmental Assessment Reports (EARs) for each of the drought permit/order options identified in the Drought Plan. EARs (including EMPs) have already been prepared for several of our drought permit/order options. However, some of these EARs pre-date current guidance and therefore, will be reviewed and revised to ensure a compliant EAR exists for these options. Programmes of baseline monitoring have already commenced for several of these sites, and will be reviewed and continued where appropriate to do so.</p> <p>All subsequent EARs produced will be compliant with appropriate guidance documents including the Defra/Welsh Government Drought Order/Permit guidance (May 2011) and the Environment Agency Water Company Drought Plan Guideline (June 2011; referred to as the DPG). The EARs will also address requirements of the WFD, Habitats Regulations (for sites where a drought order has the potential to impact a European designated site), and Countryside Rights of Way Act (for sites where a drought permit/order has the potential to impact a SSSI).</p> <p>We propose to complete the EARs for drought permit /order options in a two tiered approach. Tier 1 sites are those that sites that have been identified as most likely to be used in the future, or sites with high environmental sensitivity. Tier 2 sites are those which are less likely to be implemented, or where environment sensitivity is anticipated to be lower. We have developed a programme to complete EARs as</p>



			<p>soon as we are able to support drought permit/order applications and these will be complete to support the next revision of the Drought Plan. Following completion of the EAR for each drought permit/order option, monitoring recommendations made in the EMP section of each report will be agreed with NRW and EA. Baseline monitoring as specified in the EMPs will then be undertaken within AMP6. We can now confirm that we have secured the funding to carry out the proposed environmental assessment and monitoring work before the next Drought Plan update is required.</p> <p>The EMP's and EAR's have been made available to the Environment Agency and NRW when they were originally produced, but we are happy to provide them again if necessary.</p>
5.0	Natural Resources Wales	<p><u>Supply side options North Wales (Section 5, Tables 5.1 - , pp78-108).</u></p> <p>We note the assessment of supply side options for North Wales and that significant and minor negative environmental effects are identified for a number of options (for example, Blaenau Ffestiniog 8026 and Barmouth 8033). We welcome the precautionary approach taken to this assessment and the mitigation measures that could be put in place to address them identified both here and in Section 8. However, we note that most of the possible mitigation is targeted at the construction impacts and relatively little is identified for the possible operational impacts. It should also be noted that drought triggers and/or mitigation measures need to be implemented at appropriate times (as defined by Drought Management Zones within the main plan). We accept that it is not always clear when mitigation will need to take place for each option, as this still needs to be determined or will depending on the local conditions at the time. However, this will need to be in place before specific drought</p>	<p>We recognise that where appropriate, mitigation measures will need to be in place before specific drought orders/permits are required.</p>



		orders/permits are required.	
6.0	Natural Resources Wales	<p><u>Supply side options South East Wales (Section 6, Tables 6.1-6.42, pp110-145):</u></p> <p>We note the assessment of supply side options for South East Wales and that significant and minor negative environmental effects are identified for a number of options (in particular for SEWCUS 8121). See comments on section 5 on the need for further detail on potential mitigation measures which also apply to the assessment of these options.</p>	We recognise that where appropriate, mitigation measures will need to be in place before specific drought orders/permits are required.
7.0	Natural Resources Wales	<p><u>Supply side options in South West Wales (section 7, Tables7.1-7.12 , pp146-159):</u></p> <p>We note the assessment of supply side options for South West Wales and that significant and minor negative environmental effects are identified for a number of options (for example, Tywi conjunctive use system, 8201 and Pembrokeshire, 8206). See comments on section 5 on the need for further detail on potential mitigation measures which also apply to the assessment of these options.</p>	We recognise that where appropriate, mitigation measures will need to be in place before specific drought orders/permits are considered.
7.0	Natural Resources Wales	<p><u>Supply side options in South West Wales (section 7, Tables7.1-7.12 , pp146-159):</u></p> <p>We note the assessment of supply side options for South West Wales and that significant and minor negative environmental effects are identified for a number of options (for example, Tywi conjunctive use system, 8201 and Pembrokeshire, 8206). See comments on section 5 on the need for further detail on potential mitigation measures which also apply to the assessment of these options.</p>	We recognise that where appropriate, mitigation measures will need to be in place before specific drought orders/permits are considered.

8.0	Natural Resources Wales	<p><u>Mitigation measures (section 8)</u></p> <p>We welcome the mitigation measures set out in this section of the Environment Report. As outlined in our comments on sections 4-7, we recommend that along with these generic measures, more detailed site specific measures are also developed for specific options. We understand the difficulties involved in identifying such mitigation and the need to carry out detailed site investigations, but there should be clear crossreference to the Environmental Assessment and EMPs and an indication of the key areas where further investigation/mitigation needs to be targeted. This will also need to consider whether these measures need to be put in place beforehand, to increase resilience within the system, or at the Drought Order/Permit stage. We recommend that this detail, is included within the detailed assessment matrices where possible and they must be included in the environmental assessment and EMPs.</p>	<p>When we review our existing and develop our new EMP's and EAR's we will indicate the areas where further investigations/mitigation may need to be targeted and assess whether mitigation measures need to be put in place beforehand, to increase resilience within the system, or at the Drought Order/Permit stage.</p>
9.0	Natural Resources Wales	<p><u>Cumulative and in combination assessment (section 9)</u>. We note the technical difficulties in carrying out cumulative and in combination assessments for the various options within the plan. We recognise that the exact combination of options that will be implemented within a particular Water Resource Zone (WRZ) will depend on the specific conditions and considerations associated with a particular drought situation and accept that this element of the assessment process is more limited that in might be for other, similar, plans. However, while these limitations may restrict the scale and scope of the cumulative and in combination assessments, it is important that the SEA considers these as far as is practicable and identifies potential combinations of particular concern. It is also important that this is used to inform the Plan itself, particularly in relation to how it may be used to guide multiple Drought Order/Permit applications. For example, where there are multiple options across catchments which feed into different WRZs, particularly where more than one water company may be involved. We understand this exercise has been done, and it would</p>	<p>We will review the possibility of providing an indication of which drought options may be used 'in-combination' in the context of the Environmental Assessments associated with the drought options. We will make any necessary amendments required to the SEA to reflect the outcomes of this review.</p>



		have been helpful to have included it within the SEA Environment Report to help inform option appraisals for future droughts at a point where the assessment window may be significantly constrained. We accept that the consideration of mitigation measures goes some way to address this, but recommend that the SEA monitoring strategy is further strengthened and focussed towards identifying and addressing potential cumulative and in combination impacts.	
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