



STATEMENT OF RESPONSE TO THE REPRESENTATIONS ON THE DRAFT DROUGHT PLAN 2018

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Statement of Response to Representations on Draft Drought Plan 2018

This document is the Company's formal Statement of Response, as required by Section 39B of the Water Industry Act 1991, as introduced by the Water Act 2003 to the representations received on its Draft Drought Plan which was published for consultation on Monday 8 January 2018.

The Statement of Response takes account of the representations that Defra received on our Draft Drought Plan. The document sets out where the Company has made changes to their Draft Final Drought Plan to reflect the representations made. The Company intends to submit a Draft Final Drought Plan to the Secretary of State asking for permission to formally publish the Plan.

1 INTRODUCTION

1.1 Representations Received and Format of Response

The Consultation period for the Draft Drought Plan closed on Friday 2 March 2018 and Defra received a total of 12 representations.

In light of the low number of representations, the Company has decided to outline each of the key issues raised by each respondent and has then provided its response to the issue followed by changes it has made to its Draft Final Plan.

1.2 List of Organisations making Representations

Representations on the Draft Plan were received from the following organisations:-

No.	Organisation
1.	Environment Agency
2.	Southern Water
3.	West Sussex County Council
4.	Hampshire and Isle of Wight Wildlife Trust
5.	Hambledon Parish Council
6.	Binstead Nursery
7.	Portsmouth Churches HA
8.	Fareham and Crofton Cricket Club
9.	Rowlands Castle Parish Council
10.	South Downs National Park
11.	Fareham Borough Council
12.	Individual Customers

2 RESPONSE TO INDIVIDUAL REPRESENTATIONS

2.1 Environment Agency

2.1.1 Compliance with Legislation

The EA state that the Draft Drought Plan does not comply with Section 3(f) the Drought Plan Direction 2016. This refers to permits and approvals needed to implement mitigation for the North Arundel Drought Permit.

2.1.1.1 Company Response

The Company assumed that there were no further permits or permissions required to implement the North Arundel Drought Permit. Mitigation has yet to be approved by the Regulators and this will be a joint initiative with Southern Water. We now have access to Southern Water's Draft Drought Plan and the detail appendices that go with it. Southern Water's North Arundel Drought Permit will be implemented in association with Portsmouth Water's own North Arundel Drought Permit. Generic mitigation measures have been included for the Drought Permits but site specific approvals are not included in the Draft Final Drought Plan.

Portsmouth Water are working closely on the two North Arundel Drought permits (see Southern Water Response Section 2.2). At the time of the Draft Drought Plan submission Portsmouth Water had not seen the detailed environmental assessment carried out by Southern Water or discussed detailed mitigation measures. Portsmouth Water suggested various mitigation options but the environmental assessment shows that these may not be required.

Portsmouth Water will include the 'North Arundel' Environmental Assessment in its Drought Plan. We will work with Southern Water on the monitoring and mitigation required to make both Drought Permits 'application ready'.

2.1.1.2 Changes for the Draft Final Plan

Southern Water have set out an environmental monitoring plan for the area and suggested generic mitigation measures. Portsmouth Water support the monitoring plan which will cover the same environments for both North Arundel abstractions. The Draft Final Plan text has been altered to match Southern Water's proposals and the Monitoring Plan has been included as Appendix 'L'.

As stated in Southern Water's response to our Plan, we will continue to work closely with them on monitoring and mitigation at North Arundel. If the final mitigation plan is agreed in time it could be included in the Final Drought Plan 2018. Portsmouth Water will add the 'North Arundel' environmental assessment to the Draft Final Drought Plan. The text of the Draft Final Drought Plan has been altered to reflect the environmental assessment.

2.1.2 Lower Itchen Drought Order

The EA would like to see a clearer understanding between Southern Water and Portsmouth Water on the Lower Itchen Drought Orders. They say that there are inconsistencies between the Draft Drought Plans and the use of demand restrictions.

2.1.2.1 Company Response

Portsmouth Water did not have access to Southern Water's Drought Plan at the time that the plan was drafted. Since that date the Public Inquiry into the use of Southern Water's Lower Itchen Source has been opened and suspended. A lot of new information is now available and a Section 20 Agreement has been drafted between the EA and Southern

Water. Portsmouth Water were not party to these negotiations and only have access to published documents.

Portsmouth Water assumed that demand restrictions would have to be in place before the Lower Itchen Drought Orders could be implemented. If this is not the case then this will be part of the Final Section 20 Agreement and Portsmouth Water will reflect this in the Final Drought Plan.

The EA have stated that Portsmouth Water and Southern have included different Lower Itchen flow conditions in their respective Draft Drought Plans. Portsmouth Water do not think this is the case and the details have been taken from the supporting documents provided at the Inquiry. The modelling results and proposed flow conditions are set out in Appendix B 'Hydrology and Physical Environment Assessment' dated January 2018. Section B3.5 states the proposed flow conditions and Table 12 shows the impact on velocities and depths. Southern Water's Lower Itchen abstraction will have a licence condition that refers to a 'Minimum Residual Flow' (MRF) at Highbridge & Allbrook of 198 MI/d. The Drought Order will reduce this MRF to 160 MI/d as a temporary measure until Southern Water's 'Long Term Solution' is in place. Portsmouth Water's Lower Itchen abstraction already has an MRF condition at Woodmill of 194 MI/d which was implemented in 2011. The Drought Order seeks to reduce this MRF to 150 MI/d to allow Portsmouth Water to continue to provide a bulk supply of 15 MI/d to Southern Water.

2.1.2.2 *Changes for the Draft Final Plan*

Portsmouth Water has changed the text of Section 4.4.8 of the Draft Final Drought Plan to remove references to demand restrictions. If the Final Agreement between the EA and Southern Water is available in time additional comments could be added to the Final Drought Plan when it is published. Portsmouth Water will check that the outcome of the inquiry does not altered the flow conditions and talk to Southern Water about the details included in their Final Drought Plan.

2.1.3 **North Arundel Drought Permit**

The EA state that the North Arundel Drought Permit (Source S) fails to meet section 3(f) of the Drought Plan (England) Direction 2016. This refers to permits and approvals needed to implement mitigation measures.

The EA state that the Company could do more to identify mitigation measures for North Arundel (Source S).

2.1.3.1 *Company Response*

Section 2.1.1.1 covers the Company response on failing to meet direction 3(f).

2.1.3.2 *Changes for the Draft Final Plan*

Section 2.1.1.2 covers the changes to the Draft Final Plan.

2.1.4 **Improved Presentation of the Scenarios**

The EA state that figures used to describe the drought scenarios are not clear. The triggers, actions and timings should be presented on the graphs.

This issue has been raised by other stakeholders.

2.1.4.1 *Company Response*

The Company agree that the figures could have more information on them and that the link between the figures and the text could be clearer.

2.1.4.2 *Changes for the Draft Final Plan*

Portsmouth Water have altered the figures and their position in the text. The figures are now part of section on each individual scenario and they contain information on the triggers, the timing of restrictions and the end of the drought. The lessons learnt from the drought are covered in Section 6.1.2 of the Draft Final Drought Plan.

2.1.5 **Lead in time for Drought Permits**

The EA state that Portsmouth Water has allowed too long a lead in time for the drought permit at North Arundel (Source S). It would be difficult to justify an exceptional shortage of rainfall at this time.

2.1.5.1 *Company Response*

The process of applying for a Drought Permit is initiated by the groundwater level trigger but it may also be related to Southern Water's situation. It seems prudent in a scenario 'B' drought, where groundwater level crosses the third trigger soon after the second trigger, to be planning for a dry summer. The Drought Permit process can start before the exceptional shortage of rain has been proved. Each drought will be different and it is not possible to be prescriptive about exactly when a drought measure is needed.

2.1.5.2 *Changes to Draft Final Plan*

Portsmouth Water have added some text to explain how an exceptional shortage of rain is calculated. The drought scenario figures have been annotated to show the trigger levels and the drought actions.

2.1.6 **Clarity on Drought Scenarios**

The EA have asked for clarity about what is covered by Scenario 'C' and Scenario 'D' droughts and their relationship with the 'Reference Level of Service'.

2.1.6.1 *Company Response*

Portsmouth Water have set a level of service for avoiding standpipes in the street, or rota cuts, of 1 in 200 years. This is the 'Reference Level of Service' and it sets the resilience necessary to avoid emergency drought orders. This means that a plan is resilient to a drought with a 0.5% chance of occurrence.

The drought actions, which are also set out in the Draft WRMP 2019, are sufficient to just meet this 1 in 200 standard. The Draft Final Drought Plan and the Draft WRMP do not cover exceptional droughts. These are covered by the Emergency Plan which is not the subject of this consultation.

Uncertainty about the effectiveness of demand management options is included as headroom in the Draft WRMP 2019. In terms of drought management, if the benefits of a drought management option are not seen, then the next stage of the Drought Plan will be brought forward. Ultimately the volume of water provided as bulk supplies to Southern Water might have to be reduced. The concept of 'Pain Sharing' is well established for bulk supplies and helps both Companies cope with uncertainty.

References to extreme event have been removed from the text and further options such as drip irrigation restrictions, and further supply side options are not required for Scenario 'C' or Scenario 'D'. Demand savings in an extreme drought are not included in the Draft Final Drought Plan and reference to them has been removed from the text.

2.1.6.2 *Changes to the Draft Final Plan*

References to extreme events, further demand restrictions and further supply side options have been removed from the Draft Final Drought Plan.

2.1.7 **Scenario Presentation**

The EA state that the presentation of Scenario 'C' is confusing because the text refers to protecting supplies throughout the most severe droughts.

2.1.7.1 *Company Response*

The Company will remove any reference to severe droughts in Section 4.4.9.4.

2.1.7.2 *Changes to Draft Final Plan*

Changes made to the text in Section 4.4.9.4.

2.1.8 **Post Drought Actions**

The EA state that Portsmouth Water do not outline the process for stopping drought management actions.

2.1.8.1 *Company Response*

Section 4.4.9 states that there is a control curve for removing restrictions at the end of a drought. This is shown in blue on the drought scenario figures and is annotated in the Draft Final Drought Plan.

Each of the sections of text about the scenarios refers to the removal of drought measures and when this is expected to occur.

Section 6.1.2 covers the lessons learnt from a drought and the post drought review. The form of the review is set out in the Defra 'Drought Plan Guidance'.

2.1.8.2 *Changes to Draft Final Plan*

The drought scenario figures have been annotated to show the 'Upper Trigger' and the point at which each drought ends.

Text has been added to Section 6.1.2 to cover the proposed content of the post drought review including a timetable and milestones.

2.1.9 **Environment Agency Monitoring Network**

The EA say that their monitoring network is constantly under review and sites may be closed. It is the water companies' responsibility to undertake monitoring for Drought Permits.

2.1.9.1 *Company Response*

Where there are gaps in the monitoring data, or where new issues have been raised, Portsmouth Water is happy to work with Southern Water on their 'Environmental Monitoring Plan'. This plan is now included in our Draft Final Drought Plan document.

2.1.9.2 *Changes to Draft Final Plan*

Portsmouth Water has included references to Southern Water's North Arundel Environment Monitoring Plan. This includes baseline monitoring and additional survey work.

2.1.10 **Further details of the North Arundel Drought Permit (Source S)**

The EA suggest that we should include further details of the North Arundel Drought Permit including:

- Venues for public hearings
- Preparing the case for an exceptional shortage of rain
- Submit a draft permit
- Provide a plan or programme for the application

2.1.10.1 *Company Response*

The venue for public hearings is usually selected at the time in discussion with the Inspector. Portsmouth Water has added a section to the Draft Final Drought Plan to cover the calculation of an exceptional shortage of rain and a programme for implementing the Drought Permit.

2.1.10.2 *Changes made to the Draft Final Plan*

The exceptional shortage of rain calculation has been covered in Section 3.2 Drought Triggers.

An application programme has been added to Section 4.4.6 Drought Permits.

2.1.11 **Recommissioned Sources**

The EA expects the Company to state the yield of de-commissioned sources even if they are only used in an extreme drought.

2.1.11.1 *Company Response*

No further modelling work has been carried out and recommissioned sources are not regarded as feasible options in the Draft WRMP or the Draft Final Drought Plan.

The Drought Plan 2018 does not cover extreme droughts and the appraisal process has not considered these options. The Emergency Plan may consider that further demand restrictions, such as standpipes in the street, are a more sustainable solution.

2.1.11.2 *Changes for the Draft Final Plan*

These options are unfeasible for the Draft Final Drought Plan and references to them in the text have been removed.

2.1.12 **Temporary Desalination Plant**

The EA would like to see more information on this option and to discuss feasibility with area staff.

2.1.12.1 *Company Response*

Temporary Desalination Plants were not considered as a feasible option in the options appraisal process.

2.1.12.2 *Changes for the Draft Final Plan*

Temporary desalination is not a feasible option and has been removed from Appendix 'F'.

2.1.13 **River Meon Drought Permit (Source H)**

The EA state that the Drought Permit could be rejected because of inaccurate information.

2.1.13.1 *Company Response*

This option was covered in the WRMP appraisal process and by the SEA. DO recovery is a water quality issue and the River Meon Drought Permit is not a feasible drought option.

2.1.13.2 *Changes for the Draft Final Plan*

The River Meon Drought Permit is not a feasible option and has been removed from the main text and the list of Drought Management Options (Appendix 'F').

2.2 Southern Water

2.2.1 Bulk Supplies

Southern Water refer to the bulk supplies and their importance to the reliability of their plan.

2.2.1.1 *Company Response*

Portsmouth Water will continue to work with Southern Water to ensure that both plans are reliable during drought events. Any changes will be agreed between the companies and operational flexibility will be considered.

2.2.1.2 *Changes to Draft Final Plan*

No changes are required.

2.2.2 North Arundel Drought Permits

Southern Water support Portsmouth Water's commitment to work together on the potential impacts of the two North Arundel Drought Permits.

2.2.2.1 *Company Response*

Portsmouth Water will continue to work with Southern Water, the Environment Agency and Natural England on an appropriate monitoring programme for the area. This will lead to a common mitigation programme if required.

2.2.2.2 *Changes to the Draft Plan*

Portsmouth Water has included Southern Water's North Arundel Environmental Monitoring Plan as Appendix 'L' in the Draft Final Drought Plan.

2.3 West Sussex County Council

2.3.1 **Conflicting Messages on Water Scarcity**

WSCC are concerned about conflicting messages over water scarcity in West Sussex.

2.3.1.1 *Company Response*

West Sussex is supplied by different companies and they have different levels of service and different local issues. Although the companies work together during an impending drought it is not possible for them to all implement restrictions at the same time. This would not be in customers' best interests or comply with the individual Drought Plans.

In terms of 'Water Scarcity' there are large variations across the South East and Portsmouth Water is not in an area of 'Serious Water Stress'. This has implications for metering policy and the messages that are used for drought planning. On the plus side it means that Portsmouth Water can provide bulk supplies to Southern Water. These bulk supplies protect West Sussex customers from unnecessary demand restrictions and increase overall resilience.

2.3.1.2 *Changes to Draft Final Plan*

None.

2.3.2 **Emergency Plan**

West Sussex would like to see more detail on the Emergency Plan and the Civil Contingencies Act 2004.

2.3.2.1 *Company Response*

The Drought Plan only covers events up to a 1 in 200 return period (0.5% risk) which is the 'Reference Level of Service'. Extreme drought will be dealt with via the Emergency Plan which is not part of this consultation. Portsmouth Water would be happy to discuss emergency planning with West Sussex County Council outside of this consultation.

2.3.2.2 *Changes to Draft Final Plan*

More text has been added on emergency planning and liaison with Local Authorities.

2.3.3 **Conflicting Messages on Water Conservation**

WSCC state that residents in West Sussex receive conflicting messages on water conservation.

2.3.3.1 *Company Response*

Water conservation is a key element of drought planning and takes us beyond normal levels of water efficiency. It is all about not using water rather than just using it more efficiently. Portsmouth Water and Southern Water have the same approach to water conservation in a drought. All water companies have signed up to the 'Code of Practice on Water Use Restrictions'.

Unfortunately we have different levels of service and Southern Water have to impose their restrictions more frequently than Portsmouth Water. We have not had any restrictions since 1976 and some Southern Water customers have had multiple and multi-year restrictions. Drought planning is area specific with statutory triggers such as 'Serious Shortage of Rainfall'. This means that it is inevitable that parts of Southern Water's area of supply will have restrictions in place when others do not.

The Drought Plan does contain a commitment to regional drought co-ordination (Section 6.1.2) and the Environment Agency also has a role in this work.

2.3.3.2 *Changes to Draft Final Plan*

The Code of Practice on Water Use Restrictions has been added to the Draft Final Plan as an appendix.

2.3.4 **Water Efficiency, Metering and Leakage**

The Council would like to know more about demand management in Portsmouth Water's area. They mention water efficiency, metering and leakage control.

2.3.4.1 *Company Response*

The Drought Plan is an operational plan that comes out of the longer term Water Resources Management Plan (WRMP). These plans now have the same five year review process and the WRMP is also out for consultation at the moment (deadline 25 May 2018).

Water efficiency, metering and leakage control are all covered by the WRMP in addition to water supply schemes such as Havant Thicket Reservoir. On the specific point of meter penetration it is important to understand that Portsmouth Water is unable to compulsorily meter customers. It is not in an area of 'Serious Water Stress' but has proposed an alternative 'Not for Revenue' metering option to try and encourage a greater take up of meters.

2.3.4.2 *Changes to Draft Final Plan*

None.

2.4 Hampshire and Isle of Wight Wildlife Trust

2.4.1 Rainwater Harvesting

The Wildlife Trust would like Portsmouth Water to promote water butts and rainwater harvesting.

2.4.1.1 Company Response

The definition of a drought is a 'Serious Shortage of Rainfall' and small scale rainwater harvesting is not a realistic drought measure. Portsmouth Water are promoting large scale rainwater harvesting in the form of Havant Thicket Reservoir.

Rainwater Harvesting Systems connected to a hosepipe are covered by temporary bans. It is the use of the hosepipe that is referred to in the legislation although there are now some exceptions for micro irrigation systems. More details are available in the 'Code of Practice on Water Use Restrictions' (see Appendix 'K').

2.4.1.2 Changes for the Draft Final Plan

The 'Code of Practice on Water Use Restrictions' has been added to the Draft Final Drought Plan for information.

2.4.2 Confusing Messages about Drought

The Wildlife Trust are concerned about confusing messages about drought.

2.4.2.1 Company Response

Portsmouth Water is committed to regional drought co-ordination (Section 6.1.2) which includes working with the Environment Agency on their Drought Plans. All water companies have signed up to the 'Code of Practice on Water use Restrictions'.

Unfortunately water companies have different levels of service and Portsmouth Water has not had any demand restrictions since 1976. This means that it is inevitable that some customers will live in an area with no restrictions and work in an area with restrictions. Drought planning is area specific with statutory triggers such as 'Serious Shortage of Rainfall'.

2.4.2.2 Changes to the Draft Final Plan

None.

2.4.3 Leakage Reduction and Metering

The Wildlife Trust are concerned about a lack of ambition on leakage control and a lack of promotion of metering.

2.4.3.1 Company Response

Leakage reduction has been monitored by Ofwat and the Draft Water Resources Management Plan 2019 includes a proposal to reduce the total by 15%. This is the subject of a separate consultation which ends on the 25 May 2018.

The Draft Water Resources Management Plan 2019 does include a new initiative to promote optional metering. 'Not for Revenue' metering will help customers understand their water consumption and encourage them to opt for a meter if they stand to benefit financially. Portsmouth Water are unable to use compulsory metering because the legislation requires the area to be 'Seriously Water Stressed'.

2.4.3.2 *Changes to the Draft Final Plan*

None.

2.4.4 **Deferring Further Drought Measures**

The Wildlife Trust would like to emphasise that temporary demand restrictions will defer further drought measures.

2.4.4.1 *Company Response*

Demand restrictions have a significant impact on the Drought Plan. As a drought develops from one scenario to another the demand restrictions become more onerous and cover more customers. By the time that non-essential use restrictions are imposed the overall reduction in average demand is assumed to be 12.5%. This allows the use of Drought Permits, which impact directly on the environment, to be deferred as long as possible.

The supply schemes, included in the Draft WRMP 2019, also contribute to the deferral of Drought Permits. It would be possible to avoid Drought Permits altogether if there were significant feasible supply schemes available. The bulk supplies to Southern Water mean that we have to have a Drought Permit option in the eastern part of our distribution system. This will impact on the environment but is preferable to other drought options that Southern might otherwise need.

Portsmouth Water will work with others to promote the environmental benefits of demand restrictions in adrought.

2.4.4.2 *Changes to Draft Final Plan*

None.

2.4.5 **Environmental Mitigation**

The Wildlife Trust think that the Company should be working with other partners to deliver environmental improvements.

2.4.5.1 *Company Response*

Portsmouth Water have a long history of complying with environmental legislation early and embracing the concepts of Catchment Partnership. The Company has complied with the Habitats Directive Review of Consents and carried out river restoration schemes as part of the Water Framework Directive. The Downs and Harbours Clean Water Partnership has been running for eight years and is delivering catchment management measures and advice.

Portsmouth Water only has one Drought Permit proposal and this is being jointly developed with Southern Water. The 'Environmental Monitoring Plan' for North Arundel will cover abstractions by Southern Water and Portsmouth Water. Potential mitigation measures will be developed with Southern Water, the Environment Agency, Natural England and other partners.

2.4.5.2 *Changes to the Draft Final Plan*

The Draft Final Plan includes the monitoring proposals and the text has been altered to emphasise the joint approach.

2.4.6 Strategic Environmental Assessment

The Wildlife Trust are concerned that the options appraisal process does not cover the ecological impacts of abstraction.

2.4.6.1 Company Response

The options mentioned in the Draft Drought Plan have all been assessed in the Water Resources Management Plan process. This includes a 'Strategic Environmental Assessment' (SEA). This is available as part of the WRMP consultation process and there is a separate opportunity to comment on the SEA.

The Options Appraisal process considered several Drought Permit proposals but the majority were rejected on the grounds of environmental damage. The North Arundel options does have much lower impacts on wetland features and is supported by the Environmental Agency's Drought Plan.

In the future drought permits may not be required. The WRMP and the Drought Plan are reviewed on a five yearly basis and the feasible options may change.

2.4.6.2 Changes to the Draft Final Plan

None.

2.4.7 Measured Tariffs

The Wildlife Trust would like Portsmouth Water to consider measured tariffs in the future.

2.4.7.1 Company Response

Portsmouth Water did consider measured tariffs in the Draft WRMP 2019 options appraisal process. They were rejected on feasibility grounds because Portsmouth Water does not have universal metering. Changes in legislation will be required to allow compulsory metering in our area of supply and tariffs will be considered in future Water Resources Management Plans.

2.4.7.2 Changes to the Draft Final Plan

None

2.4.8 Publicising the Plight of the Environment

The Wildlife Trust think that Portsmouth Water should publicise the plight of the environment in a drought.

2.4.8.1 Company Response

Water companies have a duty to protect the environment and Portsmouth Water will communicate that water savings will help leave more water in the environment for longer.

2.4.8.2 Changes to the Draft Final Plan

Portsmouth Water will emphasise the benefits demand restrictions in terms of the environment.

2.4.9 Water Efficiency

The Wildlife Trust say that water efficiency should be a permanent consideration and not just a drought measure.

2.4.9.1 *Company Response*

Water efficiency is covered by the WRMP process and there are several initiatives included in the Draft WRMP which is out for consultation at the moment. Water efficiency is about permanent changes to devices and appliances and permanent changes of behaviour.

What we are looking for during a drought is 'Water Conservation' on a temporary basis. This means not using water for non-essential purposes to protect the essential uses such as drinking and washing.

2.4.9.2 *Changes to Draft Final Plan*

None.

2.4.10 **Water Efficiency Advice for Businesses**

The Wildlife Trust consider that Portsmouth Water should offer bespoke advice to businesses that are heavy users of water.

2.4.10.1 *Company Response*

As the Trust mention Portsmouth Water no longer has a direct relationship with commercial customers because of retail separation. Portsmouth Water will work with the retailers to ensure that bespoke water efficiency advice is given to business users.

The imposition of 'Temporary Bans' and 'Non Essential Use Bans' will have impacts on commercial customers and these are covered by the Code of Conduct. It is possible that heavy users will agree to interruptible supplies in the future. These agreements have just been used to help manage leakage problems in the West Midlands.

Agriculture and Horticulture could be considered as heavy users of water. The Environment Agency currently has powers to restrict agricultural uses but these may be revoked in the future.

2.4.10.2 *Changes to the Draft Final Plan*

None.

2.5 Hambledon Parish Council

2.5.1 Historic Droughts

Hambledon Parish Council made reference to the fact that few people would remember what droughts in the 1970's were like.

2.5.1.1 Company Response

We are required to refer to historic droughts but acknowledge that Portsmouth Water has not suffered from drought conditions for over 40 years. The Drought Plan refers to 'Drought Scenarios' rather than specific years and has tried to explain these in terms of groundwater levels, long-term average rainfall and probability of occurrence.

2.5.1.2 Changes for the Draft Final Plan

Add references to Scenario 'A' as the historic drought rather than a specific event.

2.5.2 Enhanced Leakage Control

The Council refer to the timing of Enhanced Leakage Control and the start of a drought.

2.5.2.1 Company Response

The Company is actively looking for leaks and fixing them in the most economical way all the time. At the start of a drought the emphasis will switch to 'visible leaks' to complement our calls for customer restraint. In addition the Company may introduce additional pressure reductions that would only be justified in a drought.

2.5.2.2 Changes for the Draft Final Plan

None.

2.5.3 Water Efficiency Information

The Council would like to see an education programme for water efficiency.

2.5.3.1 Company Response

The Company already has a duty to promote water efficiency and this is done through bill inserts, the Company website and our education programme. Our 'Saving Water Challenge' contains information on saving water at home, in the garden and at school. The education programme 'A World of Water' is run in association with Staunton Country Park. Water efficiency messages will be reinforced during a drought with the use of social media and the press.

2.5.3.2 Changes for the Draft Final Plan

None.

2.5.4 Special Needs Register

The Council ask how customers are placed on the Special Needs Register?

2.5.4.1 Company Response

The 'Special Needs Register' has recently been renamed by the Company to align it with the registers held by other utilities. Customers are now included on a 'Priority Services

Register' and will receive special treatment in a drought. We will write to all those on the register to explain the situation and the drought restriction 'exceptions' they are entitled to.

Customers can register on-line or ask someone else to do this for them. There are referrals from Social Services and from other utilities.

2.5.4.2 *Changes for the Draft Final Plan*

Portsmouth Water will update the sections that refer to the 'Special Needs Register'.

2.5.5 **Emergency Drought Restrictions**

The Council states a preference for rota cuts, rather than standpipes in the street, when faced with an extreme drought. This would be to protect the elderly who would find it difficult to collect water from standpipes.

2.5.5.1 *Company Response*

The Company appreciates the difficulties that elderly people will experience if standpipes are used in an extreme drought. Customers on the 'Priority Services Register' would receive special treatment in an Extreme Drought but the details will depend on the particular circumstances. The Company will carefully consider the advantages and disadvantages of standpipes and rota cuts and liaise closely with Local Authorities and others to protect the elderly and infirm. At this point it is necessary to retain both options in the Emergency Plan.

2.5.5.2 *Changes to the Draft Final Plan*

Extreme Droughts are covered by the 'Emergency Plan' rather than the Drought Plan. The Company regularly reviews the Emergency Plan and will talk to other providers about care of the elderly.

2.6 Binstead Nursery

2.6.1 Temporary Restrictions

The nursery were uncertain about the use of 'Temporary Restrictions' under severe drought conditions.

2.6.1.1 Company Response

Temporary Restrictions will be imposed during a Scenario 'A' Drought and only be removed if groundwater levels show a positive recovery. If this drought extends into a third year it will become a Scenario 'D' Severe Drought. The Temporary Restrictions will continue and they will be joined by 'Non Essential Use Bans' and a 'Drought Permit' at Source S. All of the restrictions will remain in place until there has been a positive recovery of groundwater levels.

2.6.1.2 Changes for the Draft Final Plan

The Company will improve the layout of Section 4.4.9 to show the link between the groundwater level triggers and the drought management actions.

2.6.2 Definition of Hosepipe

The Nursery is concerned about the use of piped irrigation systems and the definition of a hosepipe.

2.6.2.1 Company Response

There is no definition of a hosepipe in the regulations but the restrictions refer to what the water is used for. Under temporary bans all the restrictions refer to domestic uses of water and commercial uses, such as horticulture, are not included. Under non-essential use bans the commercial restrictions refer to sports pitches, car washing, window cleaning and gardens. They do not refer to plants for sale, horticulture or agriculture. The Environment Agency is responsible to agricultural restrictions under Section 57 of the Water Resources Act 1991.

The concessions available for commercial customers are set out in Section 4.2.3.3.

2.6.2.2 Changes to the Draft Final Plan

Portsmouth Water will provide the 'Code of Practice and Guidance on Water Use Restrictions' as an appendix to the Plan.

2.6.3 Crops Grown Indoors

The Nursery assumes that crops grown indoors will always be exempt from restrictions.

2.6.3.1 Company Response

This is true for hosepipe bans and non-essential use bans but may not be true for all drought scenarios. The Environment Agency can impose restrictions on agricultural demand and this depends on where the water comes from and how it is used.

2.6.3.2 Changes to Draft Final Plan

None.

2.6.4 Bulk Supplies to Southern Water

The Nursery asks what happens to exports of water to Hampshire and Sussex in drought.

2.6.4.1 Company Response

The bulk supplies to Southern Water are part of their Drought Management Plan and will continue up to the References Level of Service of 1 in 200. The Drought Plans rely on mutual support and Southern Water would be prepared to discuss 'pain sharing' if the need arose. This could see the bulk supplies reduced as Portsmouth Water and Southern Water's customers reduced demand in a severe drought.

2.6.4.2 Changes to the Draft Final Plan

None.

2.6.5 Can Gardeners use Watering Cans?

The Nursery asks whether gardeners can still use watering cans?

2.6.5.1 Company Response

Temporary Bans do not include watering plants with a watering can. The concessions are designed to allow people who would find it difficult to use a watering can to continue to water their gardens.

2.6.5.2 Changes to the Draft Final Plan

None.

2.7 Portsmouth Churches Housing Association

2.7.1 Standpipes/Rota Cuts

The Housing Association would prefer to see some water in the home for a few hours a day.

2.7.1.1 *Company Response*

Portsmouth Water appreciate that standpipes in the street would cause additional problems for the elderly and the infirm. Customers on the 'Priority Services Register' will receive special treatment in a drought. Community Groups, such as housing associations, can help by checking that tenants in need are on the register.

2.7.1.2 *Changes to the Draft Final Plan*

None.

2.8 Fareham and Crofton Cricket Club

2.8.1 Watering of Sports Pitches

The Cricket Club would like to see an exception for watering cricket pitches between April and August.

2.8.1.1 *Company Response*

The drought restrictions are intended to change customer's behaviour, to save water, to guarantee supplies and to protect the environment. It is important that clubs and organisations such as Local Authorities set a good example. The closure of sports pitches, on safety grounds, emphasises the seriousness of the situation and brings the drought to the attention of the general public.

2.8.1.2 *Changes to the Draft Final Plan*

None.

2.9 Rowlands Castle Parish Council

2.9.1 Differentiation of Drought Scenarios

The Council would like to see a clearer differentiation between Scenario B and C.

2.9.1.1 *Company Response*

Although the initial drought actions are initiated by groundwater level it is the relative shortage of rainfall that defines a drought and its return period (probability). Scenario 'B' and 'C' droughts are both extended two year events with limited rainfall. The difference between the scenarios and the reason that Scenario 'C' is a rarer event is the percentage of long-term average rainfall. Scenario 'B' is based on 60% of LTA rainfall and Scenario 'C' is based on 50% of LTA rainfall. In practical terms this means that the drought triggers are crossed slightly earlier and recovery starts slightly later.

Under Scenario 'C' groundwater levels are lower at the end of the summer and the yield of the groundwater sources will be lower. Having prepared for a Drought Permit during the spring and summer it may be necessary to implement the Permit in Scenario 'C' in August to maintain supplies.

2.9.1.2 *Changes to the Draft Final Plan*

The text of Section 4.4.9 will be changed to make the drought scenarios clearer and to emphasise the role of long-term average rainfall.

2.9.2 Climate Change

The Council is concerned that the use of return period does not reflect the unpredictability of weather pattern due to climate change.

2.9.2.1 *Company Response*

The Drought Plan is an operational plan and it does not take account of climate change. The weather patterns that influence the scenarios are simulated and the scenarios do not refer to specific historic events. The likelihood of an event, or its return period, refers to the probability of that event happening now and the action needed to respond to it.

Weather patterns will change as the climate warms and these impacts are included in the long-term Water Resources Management Plan. In simple terms we are still expecting warmer wetter winters and hotter dryer summers. The drought plan is updated every five years and the impacts of climate change on supply and demand can be accommodated then. The scenarios may become more frequent with time and the drought triggers will need to be re-set to take account of this.

The drought plan is driven by the weather over an extended period and in particular by long-term average rainfall.

2.9.2.2 *Changes to the Draft Final Plan*

Alter the text of Section 4.4.9 to emphasise the role of long-term average rainfall.

2.9.3 Vital and Precious Resource

The Council refer to the fact that water is a vital and precious resource and the need for water efficiency.

2.9.3.1 *Company Response*

Portsmouth Water agree that water is a precious resource and that there is a need to use water efficiently at all times. Water efficiency savings reduce demand and help us to balance supplies with customers' needs. The value of water, and the long-term plan to enhance it, are set out in the Draft Water Resources Management Plan currently out for consultation.

In a drought we are looking for changes in customer behaviour over and above water efficiency. We are looking for people and organisations to stop using water for non-essential uses.

2.9.3.2 *Changes to Draft Final Plan*

Add the comment on water being a precious resource to the Drought Plan summary document.

2.9.4 **Customer Complacency**

The Council thinks that Portsmouth Water's surplus will lead to customer complacency.

2.9.4.1 *Company Response*

The Draft Drought Plan is based on the same scenarios as the Draft Water Resources Management Plan. These scenarios take account of the proposed bulk supplies to Southern Water and under drought conditions Portsmouth Water no longer has a large surplus.

Customers will have to play their part during a drought by responding to restrictions. If they do not then the environment could be impacted more and the bulk supplies could be reduced. As the Council points out, these bulk supplies allow Portsmouth Water to help areas that are less well placed. Portsmouth Water customers benefit from lower bills as a result and increased resilience.

2.9.4.2 *Changes to Draft Final Plan*

Additional text has been included to emphasise the need for demand restrictions to help protect the environment and to secure reliable supplies.

2.10 South Down National Park

2.10.1 Protection of the Environment

The National Park is keen to see the protection of the environment and the preservation of base river flows.

2.10.1.1 *Company Response*

Portsmouth Water has complied with the Habitats Directive Review of Consents and the requirements of the Water Framework Directive. These measures were designed to protect wetland habitats including river flows. We only have one direct river abstraction and this is now constrained by monthly flow conditions and a Minimum Residual Flow in the river. This flow will be protected up to 'Severe Drought' conditions.

2.10.1.2 *Changes to the Draft Final Plan*

None.

2.10.2 Links between Drought Plans

The National Park would like to ensure that the different Company Drought Plans are linked to ensure the best case of resources across the region.

2.10.2.1 *Company Response*

The Drought Plans are part of the overall Water Resources Management Plan process. Each company has considered many options including drought measures such as temporary bans and drought permits.

In the South East the companies have worked together on the Water Resources in the South East modelling exercise. This regional modelling has informed the options selected by each Company and ensured that the best solution has been used. This solution includes bulk supplies between Portsmouth Water and Southern Water and a potential future bulk supply to South East Water.

The bulk supplies are available under drought conditions and so the Drought Plans could be said to be linked. The Plans do not have the same levels of service but they do have a common set of guidelines and a Code of Practice for restrictions. The bulk supplies allow abstraction to take place in the most sustainable locations on a regional scale. This is particularly true of the Lower Itchen abstractions where Portsmouth Water already have a sustainable licence and where we abstract close to the tidal limit.

2.10.2.2 *Changes to the Draft Final Plan*

None.

2.11 Fareham Borough Council

2.11.1 Timeframe of Bulk Supplies

The Council is concerned that the commitment to the bulk supplies is only for the duration of the Drought Plan.

2.11.1.1 *Company Response*

The bulk supplies tend to have a ten year commercial agreement with a clause that allows for an extension. In effect, the bulk supplies are embedded in the Water Resources Management Plans and therefore have at least a twenty five year commitment.

The bulk supplies are covered in more detail in the Draft Water Resources Management Plan 2019 which is currently out for consultation. Southern Water and the Environment Agency have also reached an agreement on the use of Drought Orders on the River Itchen. These orders will affect Portsmouth Water but are not part of Portsmouth Water's Drought Plan.

2.11.1.2 *Changes to the Draft Final Plan*

None.

2.11.2 National Planning Policy Framework

The Council are concerned that Government targets will result in higher housing numbers than in the Plan.

2.11.2.1 *Company Response*

The Drought Plan is an operational plan and it does not cover the longer term. It is directly linked to the Water Resources Management Plan (WRMP) and both now have a five yearly review process.

Housing numbers are included in the WRMP and these are based on the latest Government forecasts. There are sensitivity checks in the WRMP and these consider the impact of higher housing numbers and the ability of the plan to cope. Additional housing in the future could result in higher demands but it is also possible that these new homes will be more water efficient.

The WRMP contains statements about ensuring a safe, secure and reliable supply of water now and in the future. This reliability includes working with Southern Water, and South East Water, on bulk supplies and joint initiatives on the Lower Itchen and North of Arundel.

2.11.2.2 *Changes to the Draft Final Plan*

None.

2.12 Individual Customers

There were three responses to the consultation from individual customers and these have been anonymised.

2.12.1 Planning for Additional Homes

One customer was concerned about the number of additional homes in the Fareham area.

2.12.1.1 *Company Response*

The Drought Plan is an operational plan and it does not cover the longer term. It is directly linked to the Water Resources Management Plan (WRMP) and both now have a five yearly review process.

Housing numbers are included in the WRMP and these are based on the latest Government forecasts. There are sensitivity checks in the WRMP and these consider the impact of higher housing numbers and the ability of the plan to cope. Additional housing in the future could result in higher demands but it is also possible that these new homes will be more water efficient.

The WRMP contains statements about ensuring a safe, secure and reliable supply of water now and in the future. This reliability includes working with Southern Water, and South East Water, on bulk supplies and joint initiatives on the Lower Itchen and North of Arundel. See section 2.11.2.1.

2.12.1.2 *Changes to the Draft Final Plan*

None.

2.12.2 Emergency Restrictions

One customer preferred the use of rota cuts over standpipes in the street because of the impact on elderly and disabled people.

2.12.2.1 *Company Response*

The Company appreciates the difficulties that elderly people would experience if standpipes were used in an extreme drought. Customers on the 'Priority Services Register' would receive special treatment in an extreme drought. The Company will carefully consider the advantages and disadvantages of standpipes and rota cuts and liaise closely with Local Authorities and others to protect the elderly and infirm.

2.12.2.2 *Changes to the Draft Final Plan*

Extreme Droughts are covered by the 'Emergency Plan' rather than the Drought Plan. The Company regularly reviews the Emergency Plan and will talk to other stakeholders about care of the elderly.

2.12.3 The Impact of Pollution during a Drought

One customer was concerned about the impact of pollution, in particular from fracking, on the Drought Plan.

2.12.3.1 *Company Response*

The Environment Agency is responsible for approving and monitoring the water quality aspect of fracking.

If the aquifer is polluted during a drought, it is likely that the Drought Plan would move to the next stage immediately. If there were insufficient resources to meet demand the Emergency Plan would be initiated and further demand management and supply options would be investigated.

Portsmouth Water has considered resilience issues in more detail in the forthcoming Business Plan.

3 NEXT STEPS

The Company will submit this Statement of Response to the Secretary of State for the Department of Food and Rural Affairs.

It will be published on the Company website and a copy will also go to each organisation who made representations to Defra on the Company's Draft Drought Plan.

The Company intends to send the Secretary of State a Draft Final Drought Plan incorporating the changes highlighted in this Statement of Response.

The Secretary of State will then consider Portsmouth Water's response to the representations and the amendments made to in the Draft Final Drought Plan.

The Secretary of State will then advise Portsmouth Water to either publish the Final Drought Plan, provide further information on the plan or inform the Company that an examination in public will be required.