

6th July 2020

Our ref: DP21.1

Drought Management Plan: Pre-consultation – join the conversation

In the South East of England we face a challenge, the region is water stressed. The stereotypical vision of Britain as always raining is far from the truth, coupled with a growing population and an important agricultural sector it is vital that as a community we are prepared to act when drought occurs.

At South East Water we prepare drought management plans. These are reviewed annually, but with a full public consultation every five years. Our last plan was published in May 2019.

You can find our latest drought plan here - <https://corporate.southeastwater.co.uk/news-info/publications/drought-plans/>

Although it is now eight years since the last temporary use restrictions were introduced, in the south east region we have experienced a number of heatwave and extreme weather events which have helped us learn more about engaging with customers and stakeholders and their water use and water efficiency. Between 2015 and 2020 we have reduced per capita consumption by seven per cent compared to the previous five years – there is a lot we have learned from our collaborative approach to water engagement that we want to build on for our next drought plan.

We are writing today to invite your comments on our proposed approach to preparing a new draft drought plan and welcome any feedback you may have regarding our management of drought. We would like to receive all comments by **5pm, Friday 7 August 2020**. Please send your comments to wre@southeastwater.co.uk

Our intention is to submit a new draft drought plan for consultation to the Secretary of State by the 31 March 2021.

We have included with this letter a summary of the areas of our current drought plan we are intending to review, update and revise. We have posed a series of questions in relation to these areas that would be helpful to our development of the plan and further engagement. We would welcome your feedback as to whether these are the right areas to focus and if there is anything you feel is missing please let us know.

I look forward to collaborating with you as we develop our draft plan and move our programme forward.

Yours sincerely



Lee Dance, Head of Water Resources

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Our Drought Plan review

To ensure that our draft Drought Management Plan meets the requirements of the Environment Agency drought planning guidelines from April 2020, we are proposing to undertake the following actions and would welcome your involvement.

1. We will review and revise the South East Water drought plan to reflect much greater integration and a shared technical basis with the water resources management plan (WRMP) process. As a result much of the technical content in the current drought plan will be removed and replaced to reference the WRMP19. Our drought plan will use WRMP19 as its basis and be aligned to WRMP24 developments where possible as they emerge. WRMP24 modelling will complete after the draft drought plan is published for consultation.

The elements of our WRMP19 that will particularly inform this drought plan will be:

- the drought vulnerability assessment
- system performance modelling for droughts of various return periods, types and scenarios
- option appraisal and selection
- modelling resilience to a 1 in 500 year drought return period

Question 1 – Do you agree with the elements of WRMP19 that we propose to inform this drought plan? Are there any elements missing?

2. We will consider the wider role we should play during a drought in securing water supplies across the region, with a much greater conscious emphasis on cross sector and regional communication and collaboration.
3. We will engage widely with customers and stakeholders with the following research objectives:
 - to understand how drought is viewed by our customers and stakeholders in order to produce a plan that is deliverable
 - to understand the information we need to share with customers and stakeholders before, during, and after drought
 - to understand how best to communicate our drought plan with customers (so that it is clear and easy to understand)
 - to understand how different attitudinal segments of society behave during drought and their attitude towards water restrictions to enable us to communicate effectively in order to change behaviours when water is scarce
 - to understand how customers and stakeholders wish to be communicated with before, during and after drought
 - to understand how best to assist our more vulnerable customers during drought
 - to understand how we can collaborate with stakeholders and partners to deliver drought messaging to all water users within our region

Question 2 – Which sectors do you think we should collaborate with to develop our drought plan? Do you agree with these engagement objectives? Which do you think are most important?

4. We will review and re-focus the drought plan to produce an operational tactical manual that is clear and comprehensive, with priority given to demand options and the least environmentally damaging options.

Question 3 – Do you think there are additional priority areas we should consider?

5. We will review, validate (and refine where appropriate) hydrogeological, surface water, bulk supply, rainfall, soil moisture deficit, and demand management monitoring and drought triggers, making updates where necessary. Our specified trigger points will be relabelled levels 1-4 to ensure they are consistent with the definitions specified in the Environment Agency drought planning guidelines.
6. We will identify everything within Level 3 actions and above, including extreme drought management options, to delay or remove the need for Level 4 restrictions (including rota cuts and stand pipes) to no more than once every 500 years on average.
7. We will update our demand-side and supply-side management options, setting out worked examples of how we will manage supplies during a drought. We will review our current agreements for bulk transfers with neighbouring water companies, building on recent discussions regarding operating arrangements under drought conditions. We will refer to the Environment Agency's full guidance on 'Drought permits and drought orders'. We will take into consideration the conclusions of the Consumer Council for Water's report 'Understanding drought and resilience', 2013.
8. We will ensure our demand side actions meet with the UK Water Industry Research (UKWIR) report 'Managing through drought: code of practice and guidance on water use restrictions - 2013'. We will also carry out a benchmarking exercise to learn from more recent international drought experiences.

Question 4 – Do you agree with our approach to aligning with the drought planning guideline definitions? We have set out key guidance documents and research we will refer to – is there additional research you are aware of that we should consider? Are there any examples of best practice internationally that you feel we should benchmark against?

9. To ensure our potential permit are as 'application-ready' as possible in advance, we will carry out an environmental assessment and produce an environmental monitoring plan for each of our supply side actions, including any mitigation measures we plan to implement.

10. We will update the Environmental Monitoring Plan to reflect our current activities. This will consider potential changes to Environment Agency monitoring activities.
11. We will update our Management Action Plan and Communication Action Plan to take account of new data, current management structure, and changes in roles and responsibilities.
12. The Drought Plan will not be subject to a Strategic Environmental Assessment (SEA), but we will assess all drought management options in terms of their environmental impact. Our proposed plan will not require an SEA as all proposed actions were assessed as part of the final water resources management plan (WRMP19), which was approved by the Secretary of State in August 2019. During WRMP19, a full Habitats Risk Assessment, Water Framework Directive and SEA suite of assessments were undertaken and found there would be no likely significant effects on the environment as a result of these drought options.

Question 5 – Do you agree that these actions to update the plan are appropriate? Are there any others we should commit to review?