

Draft Drought Plan 2020 – Statement of Response

November 2019



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1. Introduction

Dŵr Cymru Welsh Water provide an essential public service to over three million people across most of Wales, and adjoining parts of England. Over the last 25 years, the quantity of water we supply to our customers has reduced in a 'normal' year to about 800 MI/d, through reduced leakage and lower water demand. As Wales has a significant amount of rain compared to other areas of the UK, it may appear that we should not have a water resources problem. However, enforced reductions in the volume of water available for use from our rivers for the benefit of the environment, together with population growth and the impact of climate change, may add future pressures on our water supplies.



Figure 1 - Welsh Water's operating area

Welsh Water's long term ambitions have been set out in our Water 2050 document and this places the maintenance of wholesome water supplies at its heart. One of our key strategies is what we have titled

“Enough Water For All”. In essence, this is to ensure that we always have sufficient water in line with our customers’ expectations, even in times of drought.

1.1. Drought Planning

Producing and maintaining a Drought Plan is a statutory process required by Government who have set out the legal basis for this in The Water Industry Act 1991. We are directed by Welsh Government who also provide the guiding principles for our Plan. We have worked closely with Natural Resources Wales (NRW) who produce the Drought Planning Guidance for water companies in Wales.

Our Drought Plan sets out how we will deal with drought conditions within both the urban and rural parts of our supply area, and how we will monitor the effect of the actions that we take on the natural environment. Droughts by their very nature are highly variable in terms of their timing, duration and severity but they all begin in the same way with a period of below average rainfall that continues for longer than expected.

Our Plan details:

- How we monitor for drought
- What actions we will take during a drought and how these actions are triggered
- How we will communicate with our regulators, stakeholders and customers during and when recovering from a drought period

Our Plan sets out how the regional water situation is monitored on a weekly basis and provides both rainfall and reservoir storage data. Drought indicators have been developed to identify when the water resource situation is moving into a drought and when action may be needed.

Our Plan identifies five drought trigger levels of increasing severity have been defined that will initiate drought actions proportionate to the level of risk. These will be circulated widely both within Welsh Water and shared with external stakeholders, including NRW and the Environment Agency (EA). We plan for a conservative scenario where all our systems are under stress as we recognise that events occurring simultaneously increase the magnitude and severity of an emergency situation.

The drought actions include a combination of supply-side actions such as enhanced leakage management, demand-side actions such as provision of water efficiency devices and increased communication with customers. In extreme circumstances, when the water resources reach the highest trigger level (‘emergency storage’), actions to restrict supplies to customers may have to be used.

We have produced our draft Drought Plan and consulted on this. The remainder of this report provides an overview of how we have amended our Plan in light of the responses received.

2. Overview of the Consultation

It is a statutory requirement that we consult on our draft Drought Plan in order to provide our customers and stakeholders with the opportunity to comment on and help shape the development of the Final Drought Plan. We published our draft plan for consultation on the 25th July 2019 for 8 weeks, closing on 19th September. During the consultation process we:

- Contacted over 120 organisations directly
- Contacted all relevant Members of Parliament and all Welsh Assembly Members
- Published the Plan on our website and publicised it via our Welsh Water Twitter, Facebook and Instagram feeds

In total we received comments from seven separate respondents. A summary of the feedback received from the representations on our draft Drought Plan are provided in Table 1.

Consultee	Subject of feedback
Monmouth County Council	Communication of resources status
Newport County Council	Drought plan triggers LRF communication
Pembrokeshire Coast National Park	Supply side options impact upon European protected sites
Canal and River Trust	Impact of Afon Lwyd Drought option on potential CRT abstraction
Farmers' Union of Wales	Impact of Summer 2018 weather TUBs and NEUBs impact on businesses Early warnings of drought
Environment Agency	Data exchange Bulk supply agreements Drought triggers and actions Estimate of Water savings End of a drought
Natural Resources Wales	Drought Options and impacts upon European protected sites Environmental assessments – SEA/HRA and EAR conclusions Links to other plans Water sharing Drought indicators, triggers and scenarios Drought management actions Drought communication

Table 1- List of Respondents and summary of feedback

We are grateful for all the feedback and where appropriate have made amendments to our Plan in light of this. All the comments received and our responses to them, are tabulated verbatim in Appendix 1 for ease of reference.

To provide full transparency of the amendments made we submit this Statement of Response report to Welsh Government together with our Revised Draft Drought Plan. We have formally replied to each of the respondents and provided them with a copy of this Statement of Response. The Revised Draft Drought Plan and Statement of Response and accompanying supporting reports have been published on our website at <https://www.dwrcymru.com/en/My-Water/Water-Resources.aspx>.

2.1. Revising our draft Drought Plan 2020

It is difficult to generalise the feedback from our consultation as each organisation has passed comment on different areas of the Plan. What we can say is that a relatively small number of responses were received with the most substantive queries raised by Natural Resources Wales regarding the drought options that have the potential to impact sites with protected status. It is also worth noting that there were no opposing view offered between respondents and so we are able to respond positively to all the issues raised.

The following sections provide an overview of how we have amended each Chapter of the Drought Plan in response to the comments received. In addition to this report, we have written to each respondent to provide specific feedback to every query raised. The changes made should improve our Plan in terms of making it clearer for our customers and stakeholders to understand and predominantly to reduce its potential impact upon the environment.

3. Chapter - Executive Summary

The full Drought Plan is a large document which for many people makes it inaccessible to read and understand. It is therefore important that we provide a high quality executive summary which is much shorter in length but still contains the pertinent information. NRW noted that there was no detail on our environmental assessments within the executive summary which given its importance, was an omission and so we have now rectified this.

Newport County Council requested more detail be included on drought triggers and the use of Non Essential Use Bans (NEUB) as well as a definition of leakage. We note these comments but our need to keep the Executive Summary to the point means we will leave it unchanged but we have directed Newport Council to the main Plan report which does include this additional detail.

4. Chapter 1: Introduction

The purpose of this Chapter is to provide background to Welsh Water and the context within which we prepare and maintain a Drought Plan. We also described how our experiences from the drought of 2018 have helped to shape our Plan for 2020.

4.1. Links to other plans

NRW commented that we had not explained how our drought plan links to other plans within Welsh Water. We have provided some additional text to describe this. This Plan sits between our Water Resource Management Plan, which looks at the long term water resource requirement and the investment needed to secure water resource resilience, and our 'Emergency Plans' which are solely concerned with how we would maintain supplies to our customers following the loss of water supplies. The actions taken, and the timeframes in which they are enacted are very different to those set out in a drought plan and so there are no real linkages between our drought and emergency plans.

4.2. The 2018 Drought

NRW welcomed the presence of a lessons learnt section regarding the summer of 2018 but stated that clarity was needed to confirm that as a company we did not formally reach 'drought' status. We have added text into Section 1.8 to this effect. NRW also suggested it would be useful to include the 2018 storage position on our drought action zone plots in Annex 1. We agree this would be of benefit to readers of the Plan and so have updated them accordingly for all of our water resource zones.

In their response, the Farmers Union for Wales (FUW) expressed concerns around the support it received from Welsh Water during the drought of 2018, given its impact on the farming community. The FUW suggested that during periods of severe drought wherein there is a shortage of water to stock and possible detriment to animal welfare, Welsh Water should allow farmers whose boreholes or reservoirs have dried up to use hydrants to fill bowsers and ensure that the welfare of livestock is guaranteed.

We were made aware of the farmers concerns during 2018 and whilst we always have to prioritise the delivery of potable supplies of water to our customers, we did work with NRW to suggest where we had available water resource that could be used by the farming community. During the drought of 2018, demand for water from our customers increased by 20% thus putting an extra strain on our networks to maintain a high quality supply of water. We could not therefore allow direct access via hydrants or any other means on our network as this would risk the potential for low pressure and poorer quality of water to our customers.

The FUW asked that the plan should identify and inform which bans are introduced when, so that behavioural change is stimulated and that the needs of core businesses, such as water dependant agricultural and horticultural businesses are protected above domestic users. Our Drought Plan does clearly set out that restrictions will be applied to our domestic customers first before we would apply for an Emergency Drought Order to restrict our non-domestic customers, with the timing of these actions driven predominantly by the storage position of our reservoirs.

5. Chapter 2: What Happens in a drought

This Chapter in the Plan details how we monitor and track our water resource position throughout the year to identify when we are moving into a drought situation and the actions that are taken to manage this.

5.1. How we know a drought is happening; Drought Indicators

NRW questioned whether we still used the in-house indicators of drought severity that were stated in our 2015 Drought Plan and asked for more information and the location of the data sources to be provided in the Final Plan.

We have updated our approach for the 2020 Plan given the improved rainfall data that is now readily available, in particular the Centre for Ecology and Hydrology's SPI portal. This data provides us with a more robust assessment of drought severity that we can use to drive the necessary management actions. There are still some specific sites where we track and monitor river flows and groundwater levels and so we have now included detail on these within Section 2 of the revised Plan.

5.2. When we take action in a drought; Drought Triggers

The EA raised a concern, particularly in relation to the Hereford and Monmouthshire WRZ triggers, whether these provided enough time to implement the necessary drought actions and if not, should they be based on the supply position rather than the level of demand

For the development of this Drought Plan we moved away from using supply side triggers as we know that the availability of water resource is not going to be an issue in the Herefordshire and Monmouthshire zones and so there will be no requirement for us to go to the environment to seek additional water. The only problem that can foresee is related to meeting short term peaks in demand which can be managed through tankering between adjacent zones, as was evidenced through our experiences in 2018. The issue is whether we have sufficient overall treatment works capacity in our five Herefordshire zones. Demand management actions such as Temporary Use Bans can be introduced within two weeks and so the triggers allow us plenty of time to prepare for these as we move from 'Developing Drought' to 'Drought'. Should we require a Drought Order to implement a Non Essential Use Ban then we have assumed a further four weeks to have this in place ahead of levels of demand reaching 'Severe Drought'. It should be understood that it is very unlikely the combined demand across these years will extend above our works capacity. To illustrate this, the combined peak demand experienced in 2018 was still around 20% less than our works capacity in the Herefordshire and Monmouthshire zone.

Both the EA and NRW requested that we clarify when emergency measures would be implemented as within the main report and the Annex 1 WRZ summaries, we had only included information on Stage 4 'Severe Drought'. We have now added text to both areas of the revised Plan which sets out there is a Stage 5 'Emergency Storage/Emergency Actions' drought action zone which triggers different actions to those included at Stage 4 'Severe Drought'.

5.3. End of Drought

Both NRW and the EA requested more information be included within drought recovery/end of drought stage and what indicators/triggers will be used to inform this decision. To address this we have added section 2.2.3 to the revised Plan to complement the information provided in Section 6.1, to describe the triggers we would use to identify when we are coming out of drought.

6. Chapter 3: Managing a Drought

This Chapter detailed how we would mobilise in response to a drought event, including how we will communicate to our customers, building on our 2015 Plan and our experiences of the 2018 drought. Our approach is to escalate communications activity when incidents or our actions in response to these, impact upon our customers. In the case of drought, we escalate communications activity to ask for our customers' support in using water wisely or to inform them of water use restrictions.

6.1. Our Drought Communication Plan

Newport County Council suggested that we liaise with the Local Resilience Forums during a drought, which we confirm would be the case via the "All Wales Drought Liaison Group".

NRW suggested additional organisations we should liaise with during a drought and sought confirmation that we would consult with themselves and EA before we issued any drought communications. We have updated our Drought Communications Plan to include the extra organisations and to clarify that we would coordinate with NRW and EA prior to issuing any drought messaging, as per our experiences in 2018.

The FUW suggested that increased communication to farmers specifically regarding methods of water storage and warnings of potential drought situations may be useful during the developing drought stage, rather than once the drought has begun to have an effect on businesses. Whilst we appreciate the help this may give to farmers, we feel it is NRWs who are best placed to advise on the status of rivers and groundwater levels during a drought that might lead to a risk to their water supplies, as they did during 2018.

Monmouthshire County Council suggested we could host a specific 'Drought tile' on the Welsh Water website which shows the current drought status for each water resource zone. In essence this appears to be a good idea and particularly the link to water saving information. However, we do need to avoid any confusion around messaging in relation to drought status. We will re-look at our proposed website layout and at the merits of the colour coding type system suggested.

6.2. Joint Working

Both the EA and NRW requested more information about the bulk supply agreements we have with neighbouring companies and so we have included additional text and a table of external transfers of water within section 3.4.3 of the revised Plan that details the bulk supply agreements we have and confirms the consistency of these with our WRMP19.

6.3. Data Exchange

Both the EA and NRW asked whether any data exchange agreements had been made between our organisations. We have not currently got in place any formal data exchange agreements as we feel that the data we need for our management actions is readily available. However, we will discuss this further with both NRW and EA to understand if there are any benefits to be had from formalising data agreements between our organisations. We are always happy to respond to data requests and will provide the required data, in line with legislative constraints, as soon as we are able to. More specifically, we agree that we need to provide the EA with demand data once the Herefordshire and Monmouthshire Group Drought Action zone is reached.

6.4. Supply-side options

The Pembrokeshire Coast National Park Authority noted the concerns raised with our Crowhill and Canaston options and our ability to find suitable alternatives. In line with responses received from NRW, we do not plan to use these sources during a severe drought. The Park Authority stated they were keen to work with ourselves

in future as we develop solutions for Pembrokeshire, which we appreciate and will look at how we can involve the National Park going forward.

The Canal and River Trust (CRT) raised concern that we had not made reference to our Afon Lwyd drought option in the SEWCUS WRZ being a source of water that is potentially available for use by CRT. They also stated their desire to continue their collaborative working with Welsh Water to complete the delivery of the UWAG technical delivery.

We understand that CRT is concerned over the potential impact of the proposed drought option involving the emergency abstraction of water from the Lwyd. NRW have not agreed with our conclusion of 'no adverse effect' from implementation of the Afon Lwyd drought option and so we have proposed to remove this option from our revised Plan. We acknowledge this has implications for the UWAG options that have been discussed in relation to the Afon Lwyd and so we will look to meet with CRT to understand these further and continue our joint working.

NRW noted there had been some significant change in the number of standby and/or mothballed sources in this current Plan compared to our 2015 Plan and requested further details be provided around this.

In response we have updated Tables 18 and 19 in Section 5.2 of the revised Plan to include these additional mothballed sources. Within Annex 1 we have changed the status of a number of sources from 'standby' to 'operational' to reflect the fact these sources are ready to be used but are not required to be in operation all year round.

Finally in this section, NRW requested clarity over the priority ordering for the implementation of the supply-side options and how this decision would be made during a drought.

Within our Drought Plan we have tried to retain as much flexibility as possible to allow us to respond to the varying range of droughts that we are likely to encounter. We have therefore chosen to not be overly prescriptive around our use of drought options, but will use the least environmentally impactful options first as set out in Section 3.5 of the Plan.

6.5. Demand management options

Both the EA and NRW requested that we provide estimates of the demand savings we would make from the implementation of our demand management actions, similar to that we presented in our 2015 Drought Plan.

For this Plan we modified our approach and have not included estimates of demand savings as we feel the evidence to calculate these is limited and does not accurately reflect what may be achieved during a drought. This view is supported by the initial findings of the Artesia demand insights study of Summer 2018 which proposes further research is required to estimate the benefits of TUBs and other water efficiency measures upon demand. We have added text to this effect in Section 3.3.9.

7. Chapter 4: Understanding our Drought Risk

This section of the Drought Plan described the overall process for understanding our drought risk and summarised at a high level the results of our drought scenario testing. This is an important part of our planning process to ensure we have sufficient actions available to us to manage through an extreme drought event.

More clarity was requested by FUW around the geographic spread of drought risk across our operating area, why some areas were more vulnerable than others and whether there were particular concerns in eastern Wales.

The vulnerability of a particular part of our supply area to drought is affected by a number of factors, some of which are area specific and so cause localised concerns. In the case of Pembrokeshire, NRW have significantly reduced the amount of water we are able to abstract from the Eastern and Western Cleddau Rivers in order to meet the requirements of the Habitats Directive. These more stringent conditions have recently come into effect and mean that we currently are at an increased risk of drought as shown on the drought response surface charts. Our recently published 2019 WRMP showed that for the majority of our supply area, including Eastern Wales, there is sufficient water resource available and so no further investment is currently required.

NRW suggested that for completeness, we should provide information as to how often supply-side options such as the drought permits, or drought orders would be likely to be implemented. To address this we have amended Table 13 (now Table 16) to show the likelihood of implementation of use of these schemes and at what stage of drought they would be triggered.

8. Chapter 5: Environmental monitoring and assessment

The purpose of this Chapter is to describe how we have generated options to take additional water from the environment during a drought. It also outlines the assessment work that we undertake to support our applications to our regulators and/or Government.

8.1. Environmental Supply Side Options

The most significant feedback we received on our draft Drought Plan are the concerns raised by Natural Resources Wales that there are a number of our Drought Order options where we have been unable to conclude 'no adverse effect' upon the features of European Protected sites. Under the Habitats Directive this means that our Drought Plan as it currently stands cannot be finalised, and given approval by Welsh Government to be published.

Following discussions with NRW to understand in more detail the concerns raised regarding eight of our options we have significantly updated our revised Plan in the line with the process defined by the Habitats Regulations, to allow the conclusion of 'no adverse effect' to be made. In summary we have achieved this by taking the following actions:

8109-4 (Afon Lwyd) - option has been removed from the Drought Plan

8201-1 (Crai reservoir) – option has been removed from the Drought Plan

8201-3 (Nantgaredig) – confirmation around the timing of use has allowed the conclusion of 'no adverse effect' to be agreed

8201-4 (Llyn Brienne) - option has been removed from the Drought Plan

8206-1 (Crowhill) - option has been removed from the Drought Plan though we may reconsider its use during an *in extremis* drought events

8206-2 (Rosebush reservoir) - confirmation around the timing of use has allowed the conclusion of 'no adverse effect' to be agreed

8206-7 (Llysyfran reservoir) - confirmation around the timing of use together with amendment of the volume of water used, has allowed the conclusion of 'no adverse effect' to be agreed

8206-8 (Canaston) - option has been removed from the Drought Plan though we may reconsider its use during an *in extremis* drought events

As well as updating the revised Plan, we have also amended the relevant Environmental Assessment Reports together with the Habitats Regulations Assessment and Strategic Environmental Assessment to account for the above changes. The overall impact of these changes is to make our revised Plan fully compliant with the requirements of the Habitats Directive. Section 5.9 of our revised Plan provides more detail on the approach taken.

NRW also requested a summary of the WFD assessment of the options to be included within the drought plan which we have now provided in Section 5.9.4 of our revised Drought Plan and within the individual drought option tables in Section 1.5 of the WRZ summaries in Annex 1.

9. Chapter 6: Post-drought actions

Both the EA and NRW requested more clarity be added to the Plan around our communications relating to the end of drought and the lifting of any restrictions that may be in place. We have updated our Drought Communications Plan and added text to Chapter 6 to clarify how we will communicate these key messages to our customers and stakeholders.

In addition the EA indicated that more detail was needed on how the 'lessons learnt' report information will be communicated and what timetable will be followed for the review. They also suggested that after a review we should update the Drought Plan and the Water Resource Management Plan.

We have added text in Section 6.2 of the revised Plan to confirm that we would update our Drought Plan and the WRMP as required following a review of the drought event and the finalising of our 'lessons learnt' report.

10. Drought Plan (Wales) Direction 2019

NRW reviewed our compliance with the Drought Plan (Wales) Direction 2017 and requested that we provided more details to demonstrate our compliance with Directions 3c, d and e.

Through our environmental assessments we have identified those drought options where additional permissions, other than a drought permit/drought order, are required to enable their implementation. These additional permissions include those that allow us to:

- 1) Gain access to the site/waterbody in order to undertake any necessary construction works and to operate the drought scheme
- 2) Undertake the necessary environmental monitoring pre, during and post drought option implementation
- 3) Implement any required mitigation measures that offset the identified environmental impacts from use of the drought option.

Table 2 below provides a high level overview of the sites where additional permissions are required to allow us to implement our drought options. The vast majority of these are 'standard' consents and we are fully aware of the process involved to obtain these from NRW. We would begin discussions in good time with NRW, likely as we move into the 'Developing Drought' action zone, to work towards obtaining these ahead of our drought status moving in to the 'Severe Drought' action zone.

WRZ	Option	Monitoring	Mitigation	Access
North Eryri/Ynys Mon	8001-2 (Llyn Cwellyn)	X		
	8001-3 (Llyn Alaw)	X	X	
	8001-4 (Ffynnon Llugwy)	X	X	
	8001-5 (Llyn Cefni)	X	X	
Clwyd Coastal	8012-2 (Aled Isaf)	X	X	
	8012-4 (Afon Aled)	X	X	
	8012-5 (Llannerch)	X	X	
	8012-6 (Aled Isaf to Llyn Aled)	X	X	
Tywyn/Aberdyfi	8021-1 (Afon Dysynni)	X		X
Barmouth	8033-2 (Llyn Bodlyn)	X		
Lleyn/Harlech	8034-1 (Afon Dwyfor)	X		
SEWCUS	8109-1 (Llwynon)	X	X	
	8112-1 (Afon Rhondda Fawr)	X	X	X
	8116-3 (Talybont)	X		
	8119-1 (Pontsticill)	X	X	
Tywi C.U. Area	8201-3 (Nantgaredig)	X	X	
Mid & South Ceredigion	8202-1 (Llechryd)	X		
North Ceredigion	8203-2(Nantymoch)	X		X
Pembrokeshire	8206-2 (Preseli)	X	X	
	8206-7 (Llys y Fran)	X		

Table 2: Summary of permissions required for each drought option

The individual option tables (Appendix G forms) in Section 1.5 of the relevant WRZ summaries (Annex 1) as well as the Environmental Assessment Reports (Appendices 5 to 24), include more information on the permissions required in points 2 and 3 above. To gain the necessary permissions required in point 1 above, we have identified the following:

Flood Risk Activity Permit (FRAP)

We would need to apply to NRW for a FRAP for options 8021-1 (Afon Dysynni) and option 8112-1 (Afon Rhondda Fawr) as these schemes involve the construction of a temporary river intake to enable us to abstract water. We have applied for FRAP's at other schemes within Welsh Water and our experience is that these are generally turned around fairly quickly by NRW within a number of weeks but acknowledge that it could be longer and so we would ensure that we apply in good time during a developing drought situation.

Land Access Permissions

For option 8201-1 (Afon Dysynni) we will need land access to the river frontage. Our preferred access point is at the NRW depot at Pont y Garth. We have held informal discussions with NRW previously in relation to this which have been positive and so post the finalisation of this Drought Plan we will look to firm up on these to ensure our scheme is deliverable.

For option 8112-1 (Afon Rhondda Fawr) we have provisionally identified an access point to the river within the vicinity downstream of the NRW river level station at Ty Newydd. We have not progressed further in understanding whether there are any permissions required as we have not finalised our preferred location but initially chose this point owing to its proximity to a footpath that leads to the river, which should mean public access is available.

Commercial Agreement

In order to abstract water from the Nantymoch hydroelectric power reservoir (Option 8203-2) we would need to put in place a commercial agreement with its owner Statkraft. We have previously held discussions with the reservoir owners but do not have formal arrangements in place to date. We will seek these following the publication of our Final Plan.

11. Annex 1: WRZ summaries

The WRZ summaries set out in more detail the triggers for taking action as a drought progresses and what these actions are at a water resource zone level. Each of these summaries can therefore be read independently from the main plan report if the reader is only interested in understanding a particular area.

NRW noted a number of improvements that were required to the Appendix G forms within the zonal summaries in order to provide more useful information and to correct the errors that were present. We have made all the required changes and checked that the information is consistent with that contained in the EARs.

NRW noted that where we have identified several standby or mothballed supply-side options, it is not always clear from the zonal summaries whether it is intended that these will be brought back into operation during a drought as they are listed in the tables of sources but not described in sequence of events.

Within the "Drought Management" section (1.4) of each water resource zone summary we have made it clearer which sources we are referring to and at what stage of drought we would look to use them. We have removed the term 'standby' as the sources we applied this to in the draft Plan are maintained in an operational condition rather than mothballed but are not routinely used.

12. Next Steps

All feedback and representations provided by our consultees is taken into consideration in the preparation and publication of our 2020 final Plan.

The next steps involved in the production of our Drought Plan can be summarised as follows:

- Publication of this Statement of Response and revised draft Drought Plan; 7th November 2019
- Review of Statement of Response and revised draft Drought Plan by Welsh Ministers; December 2019/January 2020
- Direction from Welsh Government: date to be determined by Welsh Government
- Publication of our Final Drought Plan: date to be determined by Welsh Government

Electronic copies of this Statement of Response are available from our website at:

<https://www.dwrcymru.com/en/My-Water/Water-Resources>

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