

# Drought Plan 2019

## Annex 8: Engagement and consultation

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Version 1



from  
**Southern  
Water** 



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## Introduction

Annex 8 sets out the engagement and consultation we carried out to help inform our draft Drought Plan and revised draft Drought Plan in 2018 and our final Drought Plan in 2019.

As we developed our draft Drought Plan we engaged with our domestic and business customers and interested regional, community, environmental and trade organisations, in addition to the water industry regulators, in particular the Environment Agency and Natural England.

We also worked with neighbouring water companies, regional organisations such as WRSE (Water Resources in the South East) and Water UK to inform our planning and help develop consistent approaches across the UK, to provide clearer messages for customers.

Our engagement included customer diaries, focus groups, online surveys, stakeholder workshops and panels, telephone calls and one-to-one and group meetings. In addition, we reviewed customer research carried out following the last drought in the region in 2011-12.

We also consulted through our website ([southernwater.co.uk](https://southernwater.co.uk)) on the scope of our Strategic Environmental Assessment and Habitat Regulations Assessment.

The process and findings of the engagement and consultation which informed our original draft Drought Plan is outlined further in this document.

We also outline the consultation and engagement we carried out on the draft Drought Plan during an eight-week statutory consultation period between March and April 2018. This included bespoke customer research, community engagement, media, social media and advertising and a dedicated 'Have Your Say' question on the Southern Water website, with an online feedback form.

The feedback from this consultation was considered and used to update the draft Drought Plan and inform the final Drought Plan.

## Key findings

The key findings from our initial customer and stakeholder research, as outlined in the draft Drought Plan 2018 Summary Consultation document were as follows:

- You understand there will be severe droughts which cannot be avoided
- You think the restrictions are appropriate, even though they are not desirable
- You don't want us to invest more to avoid droughts if it will increase bills significantly
- You think rota cuts to ration water are only acceptable in extreme circumstances
- You think we should balance the needs of customers, the environment and the economy.

# Customer engagement

## Domestic customers

Customer research to help inform the draft Drought Plan was carried out as part of Southern Water's overarching engagement programme to identify customer priorities for the future.

The first step consisted of an integrated customer research programme where we engaged with 100 domestic customers to seek their views in a customer-led initiative.

This consisted of a three-step approach, as follows:

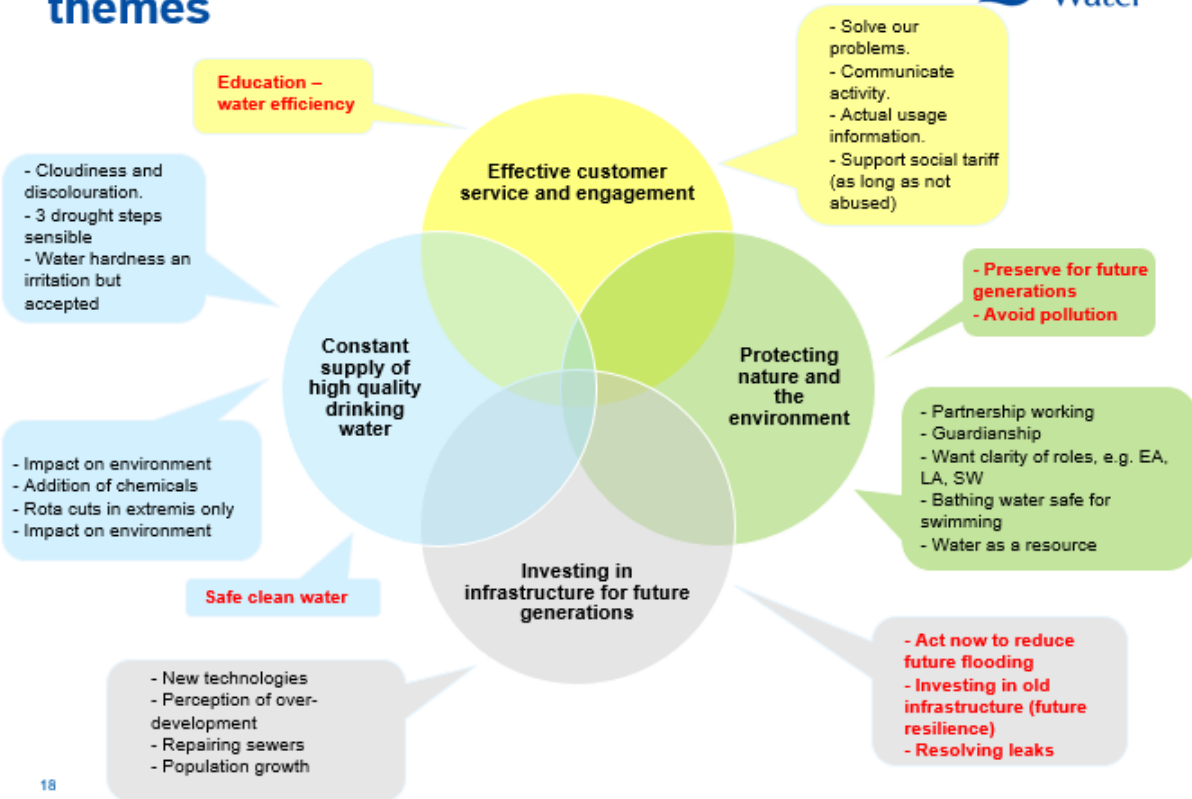
1. We captured customers' thoughts and feelings associated with clean water and wastewater in real time through a mobile phone/tablet App (paper-based information capture was also available for those who preferred it).
2. Depth interviews and discussion groups were held with App users to explore their responses
3. A quantitative research exercise was undertaken to rank and priorities key themes and issues emerging from elements one and two above.

As part of 'Step 2', we shared information with customers on our staged drought response with levels of restrictions ranging from Temporary Use Bans up to Emergency Drought Orders (standpipes and rota cuts).

Generally, customers regarded this staged response as sensible, however, it has been 40 years since anyone in the UK has experienced rota cuts and standpipes and some stakeholders have challenged whether customers would ever accept such restrictions today.

Customers' key priorities for drought – sensible drought steps and rota cuts in emergency circumstances – are shown below as part of customers' wider feedback.

# Customer's long term priorities – key themes



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## Business customers

We also carried out in-depth face-to-face interviews with a range of businesses across the Southern Water region to explore any differences in the priorities of business and domestic customers.

We found businesses approach drought on the basis of potential inconvenience to their business, rather than with regard to any environmental consequences. Generally, it appeared the businesses we engaged with felt the likelihood of restrictions which would impact on their ability to trade was so infrequent that it was not an area to invest in significantly in the future.

## Customers of the future

A third strand of research was undertaken with ‘customers of the future’ i.e. 11 to 17-year-olds. In this exercise, around 60 young people took part in app research and in-depth group discussions.

Water saving in homes was considered vitally important to many young people, as was further work to reduce leakage, which they felt could be improved through technological advances.

Droughts felt very distant to most of the young people, who had infrequent experience of them, and the impact of drought actions, such as Temporary Use Bans. While climate change was a salient topic, they struggled to comprehend 20 to 50 years in the future and what extreme weather could mean for them. They see drought as more of an issue for countries with arid climates.



They feel that there will be more pressures on the water supply in the future, however, they also believe that technology will help to address these pressures, alongside things like personal water systems, home filtration, recycling wastewater and collecting rainwater, treating it and storing it for other use.

## Post 2011-12 drought research

Following the 2011-12 drought, Southern Water carried out quantitative research with customers in its region to gauge their awareness of both the drought itself and Southern Water's actions, to learn lessons for the future. The results of this survey are included as **Appendix A: Drought Survey** to this annex.

The findings have proved useful in terms of identifying the types and channels of communication which customers prefer (TV, press and door-to-door literature or letters), the resonance of water efficiency messages (high) and in setting benchmarks to improve upon for engagement in future droughts.

# Stakeholder engagement

These customer preferences and feedback have been supported with wider engagement with stakeholders.

As part of Southern Water's overarching engagement with the communities it serves, for both future planning and day-to-day delivery, we established five stakeholder panels to help inform, advise and shape our work.

The panels – one for each county and one regional Strategic Environment Panel – include representatives from local authorities, environmental groups, regulators, and business groups.

## **Members of our Strategic Environment Panel include a range of national level stakeholders:**

Environment Agency, Natural England, Green Alliance, Southern Regional Flood and Coastal Committee, Marine Conservation Society, National Farmers Union, Rivers Trust, CCW, South Downs National Park, Kent County Council (as local authority rep) and Blueprint for Water (represented by WWF and RSPB). Officials from Defra attend on an ad hoc basis.

## **Members of our County Stakeholder Panels include:**

Local authorities, CPRE, Catchment Partnership hosts (usually River Trusts), Wildlife Trusts, National Parks, Environment Agency, Natural England (Hampshire only), CLA, angling groups, local flood forums and Chambers of Commerce.

We are also members of 10 catchment partnerships in our region and we used these to raise awareness of the draft Drought Plan and provide opportunities for stakeholders to contribute. We are also working closely with the Upper Itchen Initiative and Hampshire Water Resources Group.

To directly support the company's future planning work, we held a series of workshops in October and November 2016 in Kent, Hampshire, Sussex and on the Isle of Wight, which were attended by more than 160 stakeholders.

This gave stakeholders from a range of organisations – including environmental groups, business representatives, regulators and local authorities – an opportunity to hear about our current performance and help shape our future plans. Stakeholders had the opportunity to discuss a range of water resources issues, including the steps we would take in a drought - at a high level.

## Letters and emails

In addition to these opportunities for face-to-face engagement, we included information about the plans for our draft Drought Plan in our quarterly stakeholder newsletter, which reached more than 3,500 stakeholders across our region. In relation to the draft Drought Plan, this signposted readers to information on the Southern Water website and provided the means to get in touch to contribute to the development of the draft plan.

We also sent targeted letters to a smaller group of stakeholders who are likely to be impacted by changes to Drought Permits, or who have expressed an interest in the development of the Drought Plan previously. Where appropriate, we offered one-to-one meetings.



## Stakeholder feedback

The table below sets out the feedback we have received from stakeholders during our engagement to date which is pertinent to water supply and the Drought Plan, set alongside the earlier feedback recorded from customers.

**Table 1: Summary of customer and stakeholder feedback on drought planning**

PROVIDING A CONSTANT SUPPLY OF HIGH-QUALITY DRINKING WATER	
Customers said	Stakeholders said
<ul style="list-style-type: none"> <li>▪ Customers are grateful that we have clean, safe water on demand.</li> <li>▪ Customers are generally not very concerned about Temporary Use Bans as they feel personal inconvenience is relatively low.</li> <li>▪ Businesses highlighted the importance of reducing the risk of interruptions to supply.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Most stakeholders feel high-quality water should be a given.</li> <li>▪ Environmental groups recognise the role of Temporary Use Bans during drought and want to see sustainable levels of abstraction.</li> <li>▪ Stakeholders also support longer-term planning to build resilience and feel we should take customers, the economy and the environment into account when planning for drought.</li> <li>▪ Stakeholders also challenged whether customers’ ‘nostalgic’ view of drought would be a reality if faced with severe restrictions today.</li> <li>▪ Stakeholders provided strong support for catchment management measures.</li> </ul>

More detailed feedback recorded in regional stakeholder workshop includes:

### Sussex

In Brighton, the worst historic drought planning approach was not popular with attendees on half of the tables as it was seen as unreliable and underestimates the potential impact of climate change. The potential future drought approach was suggested as more useful by most attendees. However, a couple of other attendees suggested planning for a middle-ground drought, rather than a worst-case scenario, and warned of the risks of over investment and subsequent impact on consumers’ bills.

### Isle of Wight

In the Isle of Wight discussions, many attendees felt that there needed to be a balance between the historic and future drought approaches and that objectivity was needed.

### Kent

In the Canterbury discussions, many attendees felt that planning needed to be based on looking to the future and not the past. It was proposed that planning should consider several approaches or all of them.



## Consultation on SEA and HRA scope

During December 2016, we placed information on the Have Your Say section of the Southern Water website ([southernwater.co.uk/haveyoursay](http://southernwater.co.uk/haveyoursay)) asking for feedback on the scope of our activities to inform our Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) for the draft Drought Plan 2018.

Comments on the SEA and HRA Scoping Report were received from the following organisations:

- Natural England
- Environment Agency
- Historic England
- Hampshire and Isle of Wight Wildlife Trust
- Sussex Wildlife Trust
- WWF.

Our detailed Statement of Response following these comments is included with Annex 12 (Strategic Environmental Assessment of this Drought Plan).

## Summary of regulator engagement

The Environment Agency and Natural England helped us to develop our draft Drought Plan. We worked closely with both organisations to review our initial set of drought options and to get a better understanding of the potential environmental impacts. In addition we considered what mitigation measures we could introduce where environmental impacts are expected.

A key component of the assessment of Drought Permit and Order options is the production of detailed Environmental Assessment Reports. We have collaborated with Environment Agency and Natural England staff to ensure these reports are based on the best evidence available and to capture expert knowledge of the habitats and species that could be impacted by our options.

We also held regular liaison meetings with the Environment Agency to talk through the development of the draft Drought Plan to ensure it aligned with the Drought Planning Guideline.

## Drought Plan pre-consultation

Under Section 39B (7) of the Water Industry Act 1991, prior to preparing its Drought Plan, each water company must consult the Environment Agency, the Authority [Ofwat], the Secretary of State [Defra], and any licensed water supplier which supplies water to premises in the undertaker's area via the undertaker's supply system.

Southern Water took the opportunity to widen the scope of this pre-consultation phase prior to the preparation of the draft plan. We wrote to the following organisations inviting their comments:

- Statutory consultees: Environment Agency, Defra, Ofwat, and Natural England,
- Other stakeholders: Thames Water, Wessex Water, South East Water, Affinity Water South East, Sutton & East Surrey Water, Bournemouth Water, Portsmouth Water, and the Consumer Council for Water.

Responses to Southern Water's pre-consultation letter were received from:

- Environment Agency
- Defra.

Table 2 below sets out the various meetings and engagements we had with regulators during the development of the draft plan.

**Table 2: Summary of engagement activity with regulators**

Date	Regulator	Engagement / meeting
26/02/2016	Environment Agency	Drought Plan pre-consultation meeting
04/03/2016	Defra, Environment Agency, Natural England	Pre-consultation letters sent
17/08/2016	Natural England	Review of SEA, HRA, WFD and EAR methodology for the Drought Plan
07/09/2016	Environment Agency	WRMP / DP Pre-consultation - options appraisal and environmental assessment
30/09/2016	Environment Agency	Kent and South London Area - drought options- initial discussions
05/10/2016	Environment Agency	Solent and South Downs Area - drought options - initial discussions
01/12/16 – 31/03/17	Environment Agency and Natural England	Review of draft Environmental Assessment Reports and suggested updates/edits.
14/12/2016	Natural England	Initial HRA discussions and Environmental Assessment Reports
16/12/2016	Environment Agency	Drought Plan progress meeting
19/01/2017	Natural England	Environmental Assessment Reports
24/01/2017	Environment Agency	Kent and South London Area - drought options – workshop
31/01/2017	Environment Agency	Solent and South Downs Area - drought options – workshop
06/03/2017	Natural England	Environmental Assessment Reports
08/03/2017	Environment Agency	Kent and South London Area – Environmental Assessment Reports
10/03/2017	Environment Agency	Solent and South Downs Area – Environmental Assessment Reports
16/03/2017	Environment Agency and Natural England	HRA discussions
08/08/2017	Environment Agency, Natural England and Portsmouth Water	Scope of new Drought Permit and Order options
12/09/2017	Environment Agency, Natural England and Portsmouth Water	Scope of new Drought Permit and Order options
04/10/2017	Environment Agency and Natural England	HRA discussions

## Consultation activities

To fulfil our statutory duties and create an opportunity for our customers, stakeholders and regulators to share feedback on our draft Drought Plan, we held an eight-week publication consultation in March and April 2018, alongside our draft Water Resources Management Plan.

The aim was to engage and consult with everyone who may be impacted by the actions contained in the plan. It included all domestic and commercial customers of Southern Water, retail partners, community representatives, environmental groups and wider stakeholders and regulators.

In order to achieve a wide-ranging consultation, we carried out the following activities:

### Engagement material

To support the full set of technical documents, we produced a non-technical summary document to facilitate engagement with stakeholders, staff and informed customers.

This 32-page summary included information on water sources, types of drought, frequency of drought actions to secure water supplies, restrictions and exemptions – supported with graphics and imagery. It also provided information on communication during a drought, the environment and details on the different way people could take part in the consultation.

The document was printed, and mailed to more than 800 stakeholders in the Southern Water supply area, as well as being available online at [southernwater.co.uk/haveyoursay](http://southernwater.co.uk/haveyoursay) (either to download and in an e-reader tool to facilitate online reading).

The summary was supported by a questionnaire leaflet, with 14 questions about the Drought Plan, and this questionnaire was also made available online, with the completed surveys being emailed directly to Defra. We have found that in previous consultations, respondents find it easier to share their feedback if asked specific questions about the plan, in addition to having the ability to make comments on any aspect of their choosing.

In order to promote responses to the consultation, we offered to make a £1 donation to WaterAid for every response received, in addition to a prize draw to win an iPad pro.

### Website

The Southern Water website formed the central hub for the consultation, in a dedicated 'Have Your Say' area developed for engagement with customers at [southernwater.co.uk/haveyoursay](http://southernwater.co.uk/haveyoursay).

The Drought Plan section included information on the consultation, the contents of the draft Drought Plan, an interactive tool showing the phases of droughts and actions, the full list of documents to download and the online questionnaire.

In total there were 1,153 views of these five pages during the consultation.



Our plans to tackle droughts



Have your say on our drought plan  
Consultation March to April 2018





Household

Business

Property & developers

Retailers



Log in

Register

### Our 50-year plan to supply your water

We're looking 50 years ahead to make sure we can supply reliable, healthy drinking water – have your say on how we plan to do it.

[Read More](#) →



### How we'll tackle droughts in the South East

Our Drought Plan sets out the water restrictions we would introduce and actions we would take in a drought to keep water flowing to your tap. We held a consultation on this plan from March to April and will publish a revised plan in June.

[Read More](#) →



## Stakeholder engagement

We engaged with stakeholders with a potential interest in the Drought Plan consultation by posting a hard copy of the summary document, questionnaire and a stamped addressed envelope, addressed to Defra, and through an email announcement with a link to the Southern Water online consultation.

In total, we mailed the documents to 808 individuals or groups and emailed 1,800 stakeholders. This was combined with similar information on the draft Water Resources Management Plan, as the consultations were running concurrently.

For the emails, the open and click rates were:

Kent	42% opened	2.4% CTR (click through rate)
Sussex	35% opened	5.5% CTR
Hants & IoW	33% opened	4.1% CTR.

These engagement rates are higher than average for Southern Water emails to stakeholders.

The targeted groups included:

- Regulators
- Historic England
- MPs
- Government committees
- Local authorities
- Rivers trusts, fisheries
- Environmental groups, wildlife trusts
- Customer/consumer groups





**Annex 8: Engagement and consultation**

- Sports groups
- Horticultural bodies
- Farmers
- Trade organisations
- Developers
- Canal, port and waterways organisations, coastal organisations (navigation authorities)
- Water companies
- Car wash associations.

The draft Drought Plan was also discussed during the regular meetings of stakeholder panels, which Southern Water has formed to help inform its operational and strategic work on an ongoing basis. These were held in Sussex, Kent and Hampshire during the consultation.

One-to-one briefings were offered and these were taken up by the West Sussex Growers Association, the Swimming Pool and Allied Trades Association, the Isle of Wight Council, Natural England, Newport Rivers Group, Arun District Council, Lewes District Council, Chichester District Council, West Sussex County Council, South Downs National Park and New Forest National Park.

## Customer research

We carried out a dedicated online survey with YouGov and customer focus groups in Sussex, Kent and Hampshire to ensure we heard the views of a wide range of representative customers during the consultation.

### YouGov research

Research was carried out with nearly 3,500 customers of Southern Water in an online survey carried out by YouGov. This was based on using a 'slider' tool to gauge customers support for activities or water resource options, while providing information about bill impact and social and environmental implications. This was a combined exercise for the Drought Plan and WRMP consultation and below we have extracted relevant responses for the Drought Plan.

- 3,100 online domestic customers
- 260 business customers
- 100 face-to-face interviews with 'vulnerable' customers.

### Support for exemptions from restrictions (domestic customers)

Provision of exemptions to restrictions during drought is considered important by 50% of customers. A further 27% thought it was moderately important for specific exemptions to apply.

### Graffiti exemption

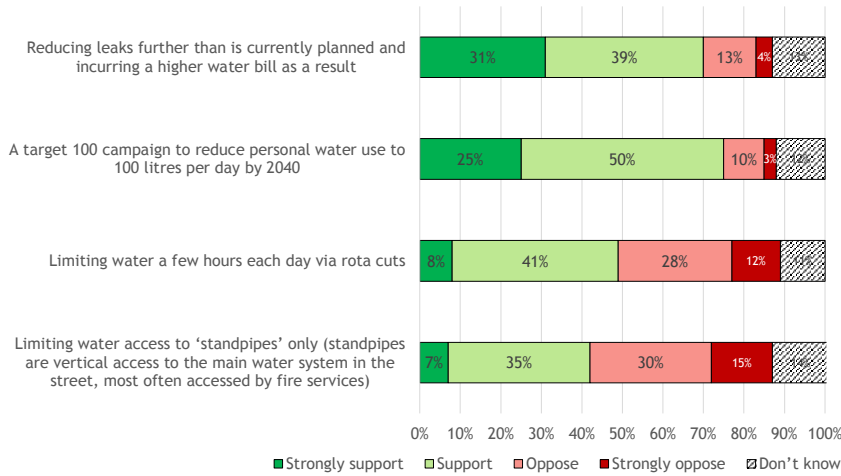
"Not being able to clean graffiti seems a little harsh (especially if it's racist or directed at a specific person)" Male 36

### Emergency restrictions

Customers prefer reducing leakage and personal water use than the introduction of standpipes and rota cuts in an emergency drought.

## Emergency restrictions

Reducing leaks and a target 100 campaign are the two emergency restrictions which gather the largest support. In contrast, more people oppose limiting water to standpipes only than support this restriction



The number of those who strongly support a target 100 campaign is significantly higher among those under 40 (29%).

Numbers of those saying don't know gets progressively higher across younger age brackets for all four categories.



### Business customers

Exemptions:

- Business customers: Among this group 58% thought exemptions were important and a further 18% said they thought they were moderately important.

Emergency restrictions

- Business customers: Reducing leaks (77%) and a Target 100 campaign (75%) were also by far the two most favoured restrictions among business customers.

### Vulnerable customers

Exemptions:

- Vulnerable customers: Among this group 50% thought exemptions were important and a further 27% said they thought they were moderately important.

Emergency restrictions:

- Vulnerable customers: Vulnerable customers favour a Target 100 campaign most (75%) closely followed by reducing leaks (70%).

### Customer focus groups

We held three customer focus groups (Kent, Sussex and Hampshire) with eight bill-paying customers invited to each group, from a range of backgrounds and ages. The summary draft Drought Plan document was used as the discussion material for each group, alongside the YouGov survey.

Key feedback from these groups included:

- Being informed about drought is key. People want widespread coverage of impending issues so that preventative behaviour can be undertaken. Breadth of proactive coverage is required with social media being seen as a key resource (especially face book.) Broader reach approaches such as radio and newspapers are also highly relevant and can be presented in a locally relevant way

- There was little concern about the phasing of water restrictions, as people expect Southern Water to follow a plan that is sensible and trust them to do so. Primary concern is with actions that will personally impact, although it is understood that personal restrictions would take place before business restrictions
- People are widely accepting of Southern Water's expertise and take at face value the proposed actions to supply water and reduce demand, without engaging too closely with the detail of this
- The exemptions from Temporary Use Bans were broadly acceptable, however there was some concern around blue badge holders as it was felt that not all would necessarily have significant medical based need
- In terms of specific exemptions, it was considered that genuinely vulnerable people should be looked after (this does not necessarily correlate with mobility issues.) Watering food crops was seen to be a minority issue, but valid
- People are happy with other restrictions. In a time of drought people shouldn't be laying new turf. They were also happy for graffiti to be left and paddling pools not to be filled
- With businesses there is concern that those businesses that need water should be able to stay working from the point of personal livelihood. Concern was spontaneously expressed about personally relevant issues such as working as a hairdresser. From the specified severe drought action the priority was businesses who use water to grow food. There was less concern about businesses who grow plants, and lowest concern about businesses who use water to remove graffiti.
- Drought Permits are an area of concern for people, particularly in areas with higher levels of environmental awareness, such as Brighton. There is concern that in taking water from rivers that the ecosystem will be severely impacted, with long term negative results. It was felt that if Southern Water got to the point where they needed to do this they would have failed. There is a high level of desire for well thought out plans to be in place to prevent this action from needing to happen
- Rota cuts and standpipes are very hard for people to get their heads around if they had never experienced them. It was felt that if water was in such restricted supply that this was the only route available then it should be utilised, however people were very reluctant for this to happen

## Customer engagement

### Social media

The Southern Water media team posted information about the draft Drought Plan consultation on the company's Twitter and Facebook accounts in March and April 2018. The resulting engagement was:

- Engagement on Twitter: likes, retweets, click-throughs (128)
- Engagement on Facebook: reach (2,500), likes, shares and comments (34)

### Advertising

During March and April 2018, we published an advert online with several media organisations, to promote the draft Drought Plan and Water Resources Management Plan consultations with our customers.





The online adverts, which were shown across Southern Water's supply area in Kent, Sussex and Hampshire, linked to the [southernwater.co.uk/haveyoursay](https://southernwater.co.uk/haveyoursay) pages when clicked on by readers.

In total, the online adverts resulted in nearly three million impressions and more than 8,300 clicks to the Have Your Say website during the period of the draft Drought Plan consultation in 2018.

It appeared on media and consumer websites run by Newsquest, Trinity Mirror, Global Advertising, Johnston Publishing and the Kent Messenger Group.

The advert was also published in the Isle of Wight County Press for six weeks, which has a circulation of 23,000.

## Community

As part of our overall engagement with communities during the consultation periods, we attended 17 customer events to gather feedback and raise awareness, reaching a footfall of more than 71,000, with about 10% engagement.

This included two innovative Talkaoke events, where people can come and go from a discussion table, which is hosted by a compere.

One event was held at Westquay shopping centre in Southampton, which generated an increase in visits to the Have Your say website of more than 60%.

The community activity also triggered an increase in requests for home water saving visits.

## Staff engagement

Information on the draft Drought Plan and the consultation was shared with Southern Water employees through an announcement on the intranet, a feature in the company magazine, Southern Water News and a blog by the Chief Executive Officer.

It was also included in a regular manager briefing, to be shared with staff in team meetings.

Questions about drought were included in a Survey Monkey questionnaire shared with staff to engage them on all the company's future plans, which was shared by intranet and email. This generated 317 responses. The topic was also raised during two employee engagement events in March, where a further 72 responses were obtained to the questionnaire.

## Regulators

Engagement with regulators was prioritised during the pre-consultation phase to ensure the draft Drought Plan was in line with guidance and government policies prior to the deadline for submission to Defra in December 2017. Table 2 above highlights the extensive number of pre-consultation meetings which took place with regulators during this pre-consultation phase.

During the consultation a meeting was held with Natural England to brief them on the draft Drought Plan as well as draft Water Resources Management Plan and Business Plan. This supported Natural England in providing a better informed representation on the draft Drought Plan.

## Hampshire Abstraction Licence Inquiry

During the draft Drought Plan consultation period a Public Inquiry was held to examine changes to abstraction licences on the River Test, Itchen and Candover proposed by the Environment Agency. The Public Inquiry opened on 13 March 2018, and closed as a Hearing on 29 March 2018. It focused on a proposed agreement between Southern Water and the Environment Agency which was drafted following submissions of evidence to the Inquiry in the preceding weeks.

The proposed agreement which was reached takes the legal form of a Water Resources Act, Section 20 Operating Agreement. It enables a new, positive way forward to protect public water supplies and the habitats and ecology of the River Itchen and River Test.

The Section 20 Operating Agreement has now been formally approved by the Secretary of State, and the abstraction licences have duly been amended in line with the Environment Agency's proposals. Southern Water has taken account of this during the process of finalising this Drought Plan alongside the other comments it has received during and after the consultation. Relevant annexes have been updated to reflect the outcome of the inquiry.

## Statement of Response

The feedback we received during the public consultation period as part of our overarching engagement programme was reviewed and considered as we updated the draft Drought Plan for submission to Defra in June 2018.

We received 13 direct responses to Defra on the plan, in addition to more general engagement, which are detailed in a Statement of Response. This was published on our website and in parallel we submitted a revised draft Drought Plan to Defra. The Statement of Response detailed how we responded to the feedback we received and where we have made updates to the plan.

The Statement of Response was shared with everyone who submitted responses to Defra as part of the consultation and promoted through the business-as-usual media, customer and stakeholder channels.

## Final Drought Plan

In February 2019 we received permission from Defra to publish our final Drought Plan subject to completing further work relating to three technical areas. We have added further information to our plan to address these issues which relate to the environmental assessment of drought permits and drought orders, drought control curves and bulk transfers. We have also added information in relation to commitments made in our Statement of Response.

In relation to the environmental assessment of our drought options we have updated and completed the Environmental Assessment Reports (EARs) of our Drought Permit and Order options, and are 'application ready' for the highest priority drought options in our plan. We have also updated our Strategic Environmental Assessment (SEA), Habitats Regulations (HRA) and Water Framework Directives (WFD) assessments of those options (these are included as annexes to our final Drought Plan). We have also updated Annex 5 (Environmental Monitoring Plan) to reflect the progress made with finalising a baseline monitoring programme following discussions with the Environment Agency and Natural England, and we have included an updated timetable for agreeing and implementing specific mitigation measures.

We have included further information in Annex 1 to reflect the 35 day and 60 day lead in times for a Test surface water Drought Permit application as set out in the Section 20 Operating Agreement (s20 agreement) between Southern Water and the Environment Agency. We have also provided further information to ensure it is clear what each drought trigger level represents.

In relation to bulk transfers we have confirmed, in Annex 4, the reliability of the new Portsmouth Water bulk supply into our Hampshire supply area. We have also provided more details of the status of existing bulk supply contracts, where we are working to update some of these, and how we will incorporate 'pain share' arrangements to improve clarity on how they will be operated during drought events.

Alongside the publication of our final Drought Plan we will take the following actions to continue our engagement and consultation:

- Publish an updated summary of the final Drought Plan to share with informed customers and stakeholders
- Publish a short customer leaflet with information about drought actions, in preparation for a drought
- Update the drought pages and links on the Southern Water website
- Update our Internal Drought Plan and share with employees, particularly those with responsibility for actions during a drought
- Prepare a customer and stakeholder engagement plan for the Western area due to increased drought activities being needed in the short term but for at least the duration of this Drought Plan. The increased frequency of drought interventions are assumed within the s20 agreement between the Environment Agency and Southern Water.
- Continue our engagement with customers and stakeholders through our regulator business-as-usual channels.