

Response ID

Submitted to Proposed changes to the water company drought plan guideline
Submitted on 2025-01-24 09:51:21

Your details

Are you providing an individual or personal response, or a response on behalf of an organisation or group? Please choose one of the following:

responding on behalf of an organisation or group

If you answered 'on behalf of an organisation or group' what is the name of the organisation or group?:

Historic England

If you answered 'other' please explain your area of interest:

We would like to keep you informed about the outcomes of this consultation. If you would like to receive emails acknowledging your response and or telling you when we have published the summary of responses, please select all that apply:

yes, I would like to receive an email acknowledgement of my response, yes, I would like to receive an email to let me know the summary of responses is published

If you have selected any of the boxes above, please tell us your email address:

Can we publish your response to this consultation?

yes

If you answered no, please tell us why:

How did you find out about this consultation?

from the Environment Agency

If you answered 'other' please specify:

What water companies "must" and "should" include in their drought plans

1 Is the guideline clear on what water companies "must" and "should" include in their drought plans? Please choose one of the following answers:

very clear

Why do you think this? Please answer below:

The guidelines set out the requirements in a clear and logical manner.

How water companies assign their drought actions to the severity of a drought (drought levels)

2 Is the guideline clear on how water companies should show the actions they will take at each drought level? Please choose one of the following answers:

very clear

Why do you think this? Please answer below:

As for question 1.

Water companies should do more to reduce residential customer demand

3 Are the further demand actions proposed to reduce residential customer water use in the guideline adequately explained for the water companies? Please choose one of the following answers:

strongly agree

Why do you think this? Please answer below:

Extreme drought management actions

4 Do you think the information provided on extreme drought management actions will help water companies in planning for a more severe drought in the future? Please choose one of the following answers:

agree

Why do you think this? Please answer below:

The guidelines are explicit in giving both a general steer and specific examples. Although not a requirement under the Habitat Regulations, the historic environment is included within EIA. Because of the potential risks to heritage sites (whether designated or not), we would recommend that the UKWIR's guidance (2021) on WRMPs and drought plans be followed and that Historic England (as the government's statutory adviser on heritage) and local authority heritage services are included in discussions around understanding, avoiding or mitigating the potential impacts of extreme drought management actions.

More details on the non-technical summary for customers and stakeholders

5 Do you think customers and stakeholders will gain a better understanding of their water company drought plans through the water company summaries? Please choose one of the following answers:

neither agree or disagree

Why do you think this? Please answer below:

General feedback on the updated water company drought plan guideline

6 Is there anything in the guideline which you think is unclear, missing or wrong?

yes

Please explain your answer and refer to the sections and page numbers relevant to your comments:

To amplify our earlier response - it would be helpful to have an explicit reference to including consideration of the historic environment when assessing the potential impacts of drought plans. This is compliant with both EIA and the UKWIR's own guidance on environmental assessment.