Dŵr Cymru
Welsh Water

Draft Drought Plan 2025

Statement of Response

April 2025

dwrcymru.com

Table of Contents

Executive Summary 4
1. Introduction 5
1.1. Drought Planning 5
2. Overview of the Consultation 7
3. Responses to Consultees 9
3.1. Afonydd Cymru 10
3.2. Cadw 12
3.3. Carmarthenshire County Council 12
3.4. Consumer Council for Water 15
3.5. Environment Agency 20
3.6. Farmers Union Wales 23
3.7. JM (Private individual) 25
3.8. National Farmers Union Cymru 26
3.9. Natural Resources Wales 28
3.10. Ofwat 52
3.11. Severn Trent and Hafren Dyfrdwy 56
3.12. Water Resources West 58
4. Next Steps 61
Appendix 1 – Proposed Post-SoR work programme 62

Table of Figures

Figure 1 - Welsh Water's operating area 5

Table of Tables

Table 1- List of Respondents and summary of feedback 8
Table 2 – Our response to Afonydd Cymru 11
Table 3 – Our response to Cadw 12
Table 4 – Our response to Carmarthenshire County Council 14
Table 5 – Our response to CCW 19
Table 6 – Our response to EA 22
Table 7 – Our response to Farmers Union Wales 24
Table 8 – Our response to JM 25
Table 9 – Our response to NFU 27
Table 10 – Our response to NRW 51
Table 11 – Our response to Ofwat 55
Table 12 – Our response to Severn Trent and Hafren Dyfrdwy 57
Table 13 – Our response to WRW 60

List of Acronyms

AEP	Annual Exceedance Probability
ANCB	Appropriate Nature Conservation Body
BBMC	Bannau Brycheiniog Mega Catchment
CCC	Carmarthenshire County Council
CCW	Consumer Council for Water
CoP	Code of Practice
CRoW Act	Countryside & Rights of Way Act (2000)
CSM	Common Standards Monitoring
CSO	Combined Sewage Overflow
CUS	Conjunctive Use System
DAZ	Drought Action Zone
DCWW	Dŵr Cymru Welsh Water
EA	Environment Agency
EAR	Environmental Assessment Report
EQR	Ecological Quality Ratios
FRAP	Flood Risk Activity Permit
FUW	Farmers Union Wales
HRA	Habitats Regulations Assessment
IROPI	Imperative Reasons of Overriding Public Interest
LA	Local Authority
LoS	Level of Service
LSE	Likely Significant Effect
MS	Member of the Senedd
NAV	New Appointments and Variations
NERC	Natural Environment Research Council
NEUB	Non-Essential Use Bans
NFU	National Farmers Union
NGR	National Grid Reference
NRW	Natural Resources Wales
PCC	Per Capita Consumption
SAC	Special Area of Conservation
SDB	Supply Demand Balance
SDBI	Supply Demand Balance Index
SEA	Strategic Environmental Assessment
SEWCUS	South East Wales Conjunctive Use System
SPS	Sewage Pumping Station
SSSI	Sites of Special Scientific Interest

TUB	Temporary Use Ban
UKWIR	UK Water Industry Research
WDLG	Wales Drought Liaison Group
WFD	Water Framework Directive
WINEP	Water Industry National Environment Programme
WLMF	Wales Land Management Forum
WRMP	Water Resource Management Plan
WRW	Water Resources West
WRZ	Water Resource Zone

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. As Wales receives more rainfall on average than much of England, one might expect Wales to always have an abundance of water, but this is not the case. The amount of water we are allowed to take from rivers, reservoirs, and boreholes is tightly controlled to protect the environment and to ensure our abstraction is sustainable. The amount we are permitted to take has reduced over the past decade, and with the increasing impacts of climate change, we anticipate greater pressure on our water resources in the future.

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 the 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
- Our internal triggers for drought status and an assessment of the drought resilience of our systems
- 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. While the trigger actions remain the same as our last Drought Plan 2020, the timing of the triggers have been re-derived for our 2025 plan using the best available data, which ensures that actions to protect water resource are implemented in a timely manner. These drought action zones will be circulated widely both within Welsh Water and shared with external stakeholders, including NRW and the Environment Agency (EA).

Drought actions are identified within our plan for the stages of drought. These actions are proportionate to the level of drought; In normal conditions, we proactively engage with our customers to promote voluntary water efficiency effort, whereas in severe drought conditions we would impose restrictions on both domestic and commercial use of water. In addition to these demand-side drought actions, we also plan for a range of supply-side actions such as reducing compensation releases from reservoirs. These supply side actions have been refined for our latest plan to balance the environmental impacts with the water resources benefits.

2. Overview of the Consultation

Legislation and Welsh Government's Guiding Principles for developing a drought plan direct us to publish a draft Drought Plan, and then consult widely on it. This process affords our customers and stakeholders the opportunity to comment on and help shape the development of the final Drought Plan.

We published our draft Drougt Plan for consultation on 10th January 2025, and the consultation closed on 7th March 2025. During the consultation process we:

- Contacted over 240 organisations and individuals directly
- Contacted all relevant Members of Parliament and all Members of the Senedd
- Published the Plan on our website

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

Consultee	Subject of feedback
Afonydd Cymru	Concern regarding demand and leakage levels, and impacts on drought resilience assessment and security of supply. Asked what additional leakage reduction work can be undertaken.
Cadw	Noted absence of paleoenvironmental deposits from key aspects of environmental assessment.
Carmarthenshire County Council	High level commentary on multiple technical aspects including drought risk assessment and environmental assessment methodologies.
CCW	Request for more 'customer-friendly' comms messaging and more water efficiency campaigns, request for clarity on action triggers, and links to Wales Drought Liaison Group. Observation that there is no process to appeal the refusal of a Temporary-Use Ban (TUB) exception.
EA	Communications with EA and English partners. Concern regarding demand and leakage levels and impacts on drought resilience assessment and Water Resources Management Plan (WRMP) position. Whitbourne hydrology.
Farmers Union of Wales	Communications with customers on private supplies, support for Drought Liaison Group and Water Resources West (WRW) for collaboration.
JM (Private individual)	Request for more information on catchment management.
National Farmers Union	Communications with customers on private supplies, support for Drought Liaison Group and Water Resources West for collaboration.
NRW	HRA process, including the need to provide further evidence to conclude no likely significant effect (LSE) for six of our supply side options, and further work as part of the HRA process to progress with a further four options. Clarification and allowance of timescales for applying for additional permissions. A broad range of other technical comments request clarifications or more information.
Ofwat	Concern regarding demand and leakage levels, and impacts on drought resilience assessment, Level of Service, and WRMP position. Communications with New Appointments and Variations (NAVs). Bulk supply agreements. Drought Statement of Intent.
Severn Trent and Hafren Dyfrdwy	Alignment of communications and messaging, Support for WRW Drought Statement of Intent, Communications with customers on private supplies.

Water Resources West	Drought Statement of Intent. Communications with customers on private supplies.

Table 1 - List of Respondents and summary of feedback

We are grateful for the time taken by each consultee to prepare feedback to our draft plan and their support on the development of a final plan.

3. Responses to Consultees

To demonstrate that we have considered every comment made by our consultees, each comment has been tabulated in Table 2 to Table 13 in its original wording. These have been ordered by consultee and divided according to observations and themes within each response. Alongside each comment, we have provided a response.

Addressing the comments required different levels of response as follows:

1. Acknowledgement of comment only
   Where acknowledgement was sufficient, acknowledgement is all that has been provided in this statement of response.

2. Response within Statement of Response only
   Consultee comments which did not result in any change to the plan are responded to in full within this Statement of Response

3. Change made within revised Drought Plan and/or associated appendices
   Comments which did necessitate a change to the plan have been responded to within the Statement of Response, clearly stating what changes have been made, as well locating where the changes can be found within the revised plan

4. Commitment to further work
   Natural Resources Wales have detailed a significant number of representations that ask for further information to be provided as evidence to support the views given in our Plan. The collation of evidence will take some time and following discussions we have committed to undertaking this work. We have prepared a draft supplementary programme of works to be agreed with NRW before publication of a final Drought Plan. Further information on this is contained within our response to NRW below.

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 also formally reply to each of the respondents and provide them with a copy of this Statement of Response. The revised draft Drought Plan, Statement of Response, and accompanying supporting reports have been published on our website at:

https://www.dwrcymru.com/en/our-services/water/water-resources.

3.1. Afonydd Cymru

Afonydd Cymru provided comments focussing on how our current levels of leakage may affect drought resilience and queried how we will enhance leakage measures on top of our current enhanced leakage management programme.

We are committed to reduce our leakage and Ofwat monitor our performance closely under a Service Commitment Plan, which aims to improve our demand management performance through our revised Leakage and Per Capita Consumption (PCC) strategies. Our latest best estimate of annual average company-level leakage for April 2025 is around 9% lower than the reported number for 2023/24. In addition to this, we are progressing the roll-out of SMART meters across the region with early focus on zones that are least resilient to drought, thus reducing the risk of needing supply drought options in these zones.

We have examined our supply against demand balances in line with current leakage performance. We remain confident that we are maintaining sufficient headroom for water resource resilience under drought and that this aligns to our WRMP24 planning. Specifically for the Pembrokeshire zone, we implemented a scheme that has improved the resilience of the zone since 2022. In a drought, we would work to increase Leakage and PCC reducing strategies to benefit the areas where water resources are most stressed.

Afonydd Cymru also queried our reported Supply Demand Balance Index (SDBI) metric, which measures what proportion of our customers are receiving a lower level of service within the reporting year compared to our WRMP target. Our response explains that an increase in actual demand against forecast demands in zones in surplus results in a reduction in surplus but not necessarily a deficit. Since the total population residing in deficit zones is very small, the impact of the deficit on the overall SDBI is proportionally small, resulting in an SDBI result of 99. This is subject to independent external audit.

Our full response to Afonydd Cymru's representation is given below in Table 2.

Your comments	Our response
Our ref: AC1 Our comments are focussed on what seems to be a disconnect between water resource planning in Welsh Water and current operational performance, and our concerns that water supply reliability is lower than that presented. Welsh Water and Ofwat do not report leakage at zonal level for annual performance, therefore we are unable to determine in which zones current leakage performance does not meet target (we would welcome this as a future consideration). Welsh Water's WRMP identifies supply demand balance concerns in SEWCUS, Twyi, Lleyn Harlech and Barmouth only (based on a Company leakage target which is not being met). In all cases, resolution of this deficit suggests demand management as part or all of the solution. The draft Drought Plan has utilised the same models as the WRMP to identify Drought Vulnerable zones. Of the 11 vulnerable zones identified, five zones have a low level of service (1:20) of the first stage of drought (SEWCUS, Tywi, Mid-South Ceredigion, Pembrokeshire and Clwyd). Of these five, only two zones were identified as having supply demand concerns in the WRMP (based on Welsh Water meeting its leakage target). One of the zones, Pembrokeshire, was subject to drought restrictions in 2022. The Drought Plan required a staged approach to options, which include in the early stages enhanced leakage management. Given the lack of zonal leakage data reported, we are unable to determine whether current performance (with leakage circa 50-60Ml/d above target) causes any more zones to be in deficit than reported. However, whilst leakage remains considerably higher than target, we do not consider Welsh Water's Drought Plan recognises that the reliability of supply in those areas is much lower than planned for and therefore the potential for restrictions is much higher. This poses increased risk of needing to apply other drought options to secure supply to customers, and poses a more significant risk to the environment, as it would drive supply options earlier than reported.	<u>Leakage performance</u> As reported in our Annual Review, our leakage is currently above that targeted in our WRMP24. Our regulators have also stressed the importance of meeting our demand management targets to maintain resilient water supplies and to reduce the risk of undertaking drought options. In response to this, we have a Service Commitment Plan in place, which aims to improve our demand management performance through our revised Leakage and PCC strategies. This is now showing significant improvements in leakage performance driven by improved network monitoring, which is helping to target leaks, and through greater efficiency in fixing leaks. We now have six monthly progress meetings with Regulators to track performance. Our Latest Best Estimate of Annual Average company-level leakage for April 25 is around 9% lower than the reported number for 2023/24. In addition to this, we are progressing the role out of SMART meters across the region with early focus on zones that are least resilient to drought, this reducing the risk of needing drought options over time. <u>Impact on drought resilience</u> Our stated levels of service within the drought risk assessment are based upon a demand scenario that is in line with the current demand and we have examined our supply against demand balances in line with current leakage performance. Although we have reduced the 'headroom' available within some zones, we remain confident that we are maintaining a good level of water resource resilience and that this will further improve into the future, aligned to our WRMP24. For the Pembrokeshire zone, we implemented a scheme to improve the resilience of the since 2022.
Our ref: AC2 Whilst Welsh Water remains above target for leakage, this presents additional pressure on the Company's ability to locate further leaks under an enhanced programme during a drought. In fact, we would suggest that Welsh Water needs to go further. To ensure Welsh Water meets the target, Welsh Water should already be delivering an enhanced programme of leakage reduction at all times, not just during a drought, and we would therefore question what other additional measures would be available?	As per our response to the comment above (our reference: AC1), we have developed Leakage and PCC strategies that are resulting in improved performance. In a drought, we would work to increase this effort to benefit the areas where water resources are most stressed.
Our ref: AC3 Having looked in detail at the WRMP and Drought Plan, we now question the annual reporting metric within the NRW Environmental Performance Assessment. In the 2023-24 Environmental Performance Assessment, NRW reported that Welsh Water's Security of Supply Index (a measure of its reliability to supply its customers during a drought) has dropped from 100 to 99 (moving the Company from Green to Amber in the assessment). We are unclear, given the scale of difference between planned and actual leakage, how the index remained at 99?	The SDBI metric measures how the supply demand balance within the reporting year, compares to that which is set out in the Water Resources Management Plan WRMP19, and is an assessment of what proportion of our customers are receiving a lower level of service than our target. In the majority of zones, we have a surplus position and, in these zones, any the margin of actual demand against forecast demands results in a reduction in surplus but not necessarily a deficit. The proportion of the total population served which reside in zones which were reported in deficit was very small, resulting in an SDBI result of 99. This is subject to independent external audit.

Table 2 – Our response to Afonydd Cymru

3.2. Cadw

Cadw provided one comment regarding the inclusion of paleoenvironmental deposits in the SEA. Our full response to Cadw's representation is given below in Table 3.

Your comments	Our response
Our ref: CADW1 Cadw are concerned that the SEA has identified that a key issue for this Drought Plan to consider is "the need to avoid damage to areas with potential for paleoenvironmental deposits during drought condition". However, Section 5.3 Environmental Assessment of the Draft Drought Plan does not include this issue in the list of key features that will be considered within the environmental assessment for each drought order. Therefore, we should strongly recommend that this key issue should be included in this list of issues needing to be addressed in Environmental Assessments.	We have updated the list of key features in Section 5.3 Environmental Assessment to include Paleoenvironmental deposits, which have been included as a key issue in the SEA.

Table 3 – Our response to Cadw

3.3. Carmarthenshire County Council

Carmarthenshire County Council's feedback was wide ranging, covering a number of aspects of the Drought Plan including, collaboration with NRW, environmental monitoring, HRA cumulative impact and climate resilience assessments, mitigation measures, modelling innovations and a suggestion for the reinstatement of Schwyll well.

Our full response to Carmarthenshire County Council's representation is given below in Table 4.

Your comments	Our response
Our ref: CCC1 Data Collection & Monitoring: We recommend enhancing data collection and monitoring to assess ecosystem risks and improve flow management strategies to reduce harm to aquatic life.	Our environmental monitoring programme, in relation to drought schemes, includes a wide range of ecosystem indicators. We will monitor specific features of the aquatic life such as macroinvertebrates, macrophytes, bryophytes, phytobenthos and fish. We will also undertake habitats quality assessment through walk-over surveys, dissolved oxygen and temperature monitoring. This takes place across the seasons and over multiple years to establish baseline information for the sites. The monitoring is undertaken in line with the current industry standards by environmental experts. We are also undertaking substantive monitoring of water bodies in connection to our wastewater investigation and delivery schemes during the next five years.
Our ref: CCC2 Cumulative Impact & Climate Resilience Assessments: The Habitats Regulation Assessment Screening Report should improve cumulative impact and climate resilience assessments to strengthen the analysis of combined effects of multiple drought options on interconnected habitats. Integrating climate projections will help assess whether mitigation strategies will remain effective under increasing drought conditions.	We acknowledge your query over cumulative impacts of drought options on interconnected habitats within our HRA (Appendix 5). Wherever possible, options that may impact interconnected habitats through functional linkages are designed to be selected on their own rather that conjunctively. Where it is unavoidable that the drought options will be used concurrently then an in-combination assessment was undertaken. The assessment is summarised in Table 3.3 of the HRA report and further details including the interconnected habitats is provided in Appendix A. Under the OJEU judgment of 2018 mitigations strategies cannot be used to offset the stage 1 impact assessment of the HRA and their effectiveness does not affect the outcome of the assessment. The mitigations selected are reviewed by NRW and updated every five years during the Drought Plan lifecycle so they remain relevant to the climate conditions encountered. The HRA was produced by specialist consultants in accordance with the current UKWIR methodology UK Water Industry Research Ltd (2012) Strategic Environmental Assessment and Habitats Regulations Assessment - Guidance for Water Resources Management Plans and Drought Plans. UKWIR, Queen Anne's Gate, London.
Our ref: CCC3 Comprehensive Mitigation Measures: The Environmental Report could include a more detailed section regarding comprehensive mitigation measures, analysis of marine impacts, and further detailed compensation measures.	Thanks for your feedback on the Environmental Report SEA (Appendix 4). Section 4.13 of the report and Table 4.23 contains information about typical mitigation measures applied during construction or operation of the drought options. The options are typically schemes that rely on altering the terms of existing environmental permits such as increased abstraction or decreased compensation terms, with no intrusive work required. The detailed mitigations required to offset the delivery of the schemes will be provided within the application documentation submitted during a drought. This will allow to target the mitigations to the specific environmental conditions of the ecosystem and the interconnected habitats at the time of application. The HRA was produced by specialist consultants in accordance with the current UKWIR methodology: UKWIR (2021) Environmental Assessment Guidance for Water Resources Management Plans and Drought Plans (21/WR/02/15) prepared by Ricardo. The HRA report (Appendix 5) considers marine impacts through the assessment of functionally linked habitats e.g. the Pembrokeshire Marine SAC and the Severn Estuary SAC. The screening granularity followed the HRA UKWIR Methodology which screens out options at Stage 1. Any option screened in will then go to stage 2 assessment which is a more detailed screening process, leading into the stage 3 and 4 compensatory measures programme. A compensatory programme will be developed for the options that are screened in at stage 4. This process will require further consultation with NRW and we will not apply for the use of these drought options until the programme of compensatory measures are agreed.

Your comments	Our response
Our ref: CCC4 Innovative Modelling & Prediction: While the analysis of drought risk using historical data is useful, there is a need to constantly revise and innovate modelling and prediction due to the effects of climate change. We welcome the new modelling efforts in this regard.	Noted. Our drought risk assessment utilises data from our Water Resource Management Plan 2024, which includes 19,200 years of stochastically generated rainfall and inflows data plus perturbation of this data under 22 climate change scenarios. Please refer to our Final Water Resources Management Plan 2024 for modelling details, here: https://www.dwrcymru.com/en/our-services/water/water-resources/final-water-resources-management-plan-2024
Our ref: CCC5 Triggers and Actions: The triggers and actions for the stages of a drought, severe drought, and emergency measures are clear, as are the associated emergency planning command structure.	Noted.
Our ref: CCC6 Resilience: We acknowledge that greater levels of resilience should lead to less chance of drought. However, we note that Carmarthenshire (Tywi CUS) is one of the least resilient areas in Wales with a 1 in 20 Annual Exceedance Probability (AEP) for drought and a 1 in 45 AEP for severe drought.	Noted. Over the next three years we have committed to investing in improving drought resilience in the Tywi CUS through enhancing interconnection between existing sources. This will enable us to better balance the water resources and utilise the substantial storage of Llyn Brianne to better protect Crai and Ystradfellte. This will enable us to better balance the water resources and utilise the substantial storage of Llyn Brianne to better protect Crai and Ystradfellte. Once delivered, these schemes will result in an improved level of service for customers in Tywi CUS.
Our ref: CCC7 Collaboration with NRW: We agree with the assessment that there needs to be collaboration and good working practices between DCWW and Natural Resources Wales (NRW) to ensure clear communication regarding drought and avoid public confusion due to mixed messaging.	Noted.
Our ref: CCC8 Leakage Management Strategy: We welcome a more ambitious leakage management strategy and any work undertaken to positively influence customer behaviour and usage.	Noted. More information on our leakage management strategy for the five year period from 2025 - 2030 is included in section 4.6.1 of our Water Resources Management Plan. Our strategy will deliver a 10% leakage reduction (of our 2024-25 position) across the 2025-2030 period and thereafter will follow a profile to achieve a 50% reduction in leakage levels, set against a 2017/18 baseline, by 2050. Our strategy will deliver a 10% leakage reduction (of our 2024-25 position) across the 2025-2030 period and thereafter will follow a profile to achieve a 50% reduction in leakage levels, set against a 2017/18 baseline, by 2050. Our plan can be found at https://www.dwrcymru.com/en/our-services/water/water-resources/final-water-resources-management-plan-2024
Our ref: CCC9 Reinstatement of Schwyll Well: While we acknowledge that the reinstatement of Schwyll Well will not support the Crai and Ystradfelle risks, we believe it could increase drought resilience across Carmarthenshire. We would welcome any steps that could see this implemented in the future	We currently have no plans in place to bring Schwyll back in to service, but we retain a licence to abstract from the source, so if circumstances change in the future, we would consider the reinstatement of Schwyll as part of our Water Resources Management Plan options appraisal process.

Table 4 – Our response to Carmarthenshire County Council

3.4. Consumer Council for Water

CCW have made 13 comments primarily focussed on our communication plan during a drought. They also sought more information on how the drought plan aligns with our WRMP24, how the Wales Drought Liaison Group responds to certain trigger points, our SMART metering rollout, and the TUB exemption process.

In response, we have updated our Drought Communications Plan and provided further information around the other queries. Our full response to CCW's representation is given below in Table 5.

Your comments	Our response
Our ref: CCW01 We are pleased to see a customer focussed communication plan and inclusion of engagement with customers during drought. We would like to engage with the water company to understand better how our pre- consultation representation and new ideas inform the final drought plan documents. There might be good reason, but at the moment we think the plan consulted has not addressed or responded to our pre-consultation representations. It is particularly important for us to see how CCW's Drought Hub tools will be used. Other examples include exemptions and appeals about Temporary Use Bans and more on CCW's role in communication plan.	Section 2.2 of our Drought Communications Plan (Appendix 1) which includes a link to the materials from CCW and additional clarification.
Our ref: CCW02 We still think that drought plan documents could be more accessible, clear and customer focussed. We would like to discuss how the company can make it easier for the public to understand what the company is doing and what is required from them at difference stages of drought.	Following approval of the Drought Plan we can turn the document into a summary document/leaflet which is customer friendly and housed on our website.
Our ref: CCW03 We are pleased that the company's communication plan made a start on distinguishing between household and business customer engagement, support and communication. More can be done to direct customers to additional sources of information and support suited to their specific (water use) profile needs.	Section 2.1 has been added to our Drought Communications Plan (Appendix 1) to detail the ways in which we communicate to various audiences.
Our ref: CCW04 We remain unclear on the process of reviewing the action trigger points and clearer links with the Wales Drought Liaison Group.	We monitor and compare the storage in our reservoirs against the position of our drought triggers and use this to support expert judgement in our overall drought management process. We have amended sections 2.7.1 and 3.2 to clarify this. As you will understand, no two droughts are the same and we will share drought data with the Wales Drought Liaison Group to understand views from stakeholders. We provide the Wales Drought Liaison Group with visibility of our reservoir storage position against our drought triggers, as well as awareness of decisions about the drought status of our Water Resource Zones. We have amended section 2.7.1 to clarify this.

Your comments	Our response
Our ref: CCW05 It is essential that the final drought plan and its supporting communications plan align with a revised Dŵr Cymru Water Resources Management Plan (WRMP) expected in Summer 2025. The final Drought Plan publications should specify company action and its commitment to reduce leakage and water demand. It should also outline how its offerings and support to households and business are changing to help them also do so. We have seen negative public responses to TUBs from household customers when they perceive the water company or non-household users to waste water. This is also important in Dŵr Cymru's case because of the ongoing investigations on leakage and the public's negative sentiment on the company's performance on that. We want to see more detail about future water efficiency campaigns, tools and customer support on offer before, during and after a drought escalates to ensure the public and business are proactively engaged at different stages - not just in a reactive manner. Changes like this could help address the issue of waning customer trust in the water industry. We would hope they would pave the way in engaging people in action that contributes to demand management at all stages of drought related action.	The plan has been updated to include a section on the high-profile water efficiency schemes which will be supported with Communications throughout the next AMP and therefore provide an example of planned communications aiming to save water for the short and longer term. See section 2.4 of our Drought Communications Plan (Appendix 1). As part of the AMP8 final determination we have performance commitments around supporting customers to reduce their consumption and this is driving our work to influence customer behaviour not only through communications but through our Cartref initiative with direct home water efficiency engagements and product installations, promotion of community events and education including online water efficiency games for schools. We are meeting with NRW and Ofwat on a regular basis to review the benefits of this work. Although customer research feedback following the Pembrokeshire TUB in 2022 included comments that DCWW should do more to deal with leakage if asking customers to reduce their usage, this should be considered in the wider context of the research findings. 35% of customers felt more positively towards Welsh Water as a result of the TUB, and perceived that the TUB was done 'for the right reasons', whereas 7% felt more negatively and expressed that more could be done to deal with leaks when asking individuals to cut down their own usage.
Our ref: CCW06 We asked that smart metering rollout, and data is considered in the drought plan. Smart meter data should be used to quantify the effect of the demand-side water efficiency measures, and inform the effectiveness of those interventions, their further rollout and company trigger actions in future drought scenarios. We have not noted a response to this.	Section 3.4.3 of the main Plan outlines our SMART meter strategy over the next 10 years and its anticipated benefit to demand reduction. We agree that SMART meters will have an important role to play in the future as this initiative is rolled out over the next 2 AMP periods. We have stated in section 3.4.3 that the data collected from our SMART meters will allow us to better understand our customers' use of water, and enable better targeted measures to encourage a reduction in use, however it is worth noting that our existing district meters use live telemetry and will remain an important source of data for monitoring the effectiveness of demand side interventions. The benefit of intervention is hard to decipher at an individual property level using SMART meter data at the moment, so the use of aggregated district level data is of more use to us until our SMART meter programme has higher penetration.
Our ref: CCW07 We were surprised to see no mention to CCW in the company's communication plan. We suggest the company should refer to our Drought Hub tools in its plan. We made this representation at pre-consultation stage.	Section 2.1 of Appendix 1 (Drought Communications Plan) included a link to the materials from CCW held on a Trello board but this could have been explained more clearly. See updates in section '2.2 Working in Partnership' and '2.1 Audiences' and increased reference to CCW recognising the important part this plays throughout.
Our ref: CCW08 The company should also revisit its plan to demonstrate the importance of coordinated communications at early stages of drought management (developing drought) collaboratively and through the Wales Drought Liaison Group. We believe that the intention is there and that this could be better articulated.	Agreed, we have put more of a detailed description in Section 3 of our Communications Plan (Appendix 1) to provide more of an explanation of how we liaise with partners of this nature.

Your comments	Our response
Our ref: CCW09 It is still unclear how trigger points for active engagement and their review are integrated at the different stages of drought (communications plan). We are keen to hear how the company will review how household customers and businesses are better engaged in voluntary action on an on-going basis. This review could help prevent the potential escalation of drought response at developing drought stages, and feedback to customers on how their actions may have made a difference (if there is evidence this has happened).	The Developing Drought section of the Communications Implementation plan (Appendix 1, Section 3) includes examples of messages which show how we ask for customers' help in doing their bit to help us save water. In the past we have found it more effective to tell customers about the lengths we are going to save water and then ask for their help too. The effectiveness of communications can be difficult because demand is impacted by many factors which vary for different audiences and of course the primarily impact of the weather, which can vary considerably geographically during the summer. This is borne out by the national project following the drought of 2022 which struggled to conclude on the impacts of demand management measures during that period. However, data will improve greatly over time due to the increase in meter penetration and use of SMART meters and this will allow a step change in our analysis. We will continue to use feedback from our household monitors, customer panel and SMART town initiatives to understand impact where possible. To make this clearer, we have updated sections of the Implementation Plan (Appendix 1, Section 3) to mention how we ask for customers help.
Our ref: CCW10 We are pleased to see the drought communications plan make a start at considering how the needs of household and non-household customers may be different in supporting their action to reduce their water use impact. More can be done to direct customers to additional sources of information and to articulate support suited to their specific water use profile and needs.	We have added an additional section to our Drought Communications Plan to better outline our communications approach to different audiences. Please see Section 2.1 of Appendix 1.
Our ref: CCW11 The drought plan document suite could be redesigned to include a more concise summary or external page to communicate what steps companies plan when considering drought response. We think that drought plan documents could be more accessible, clear and customer focussed. We would like to discuss how the company can make it easier for the public to understand what the company is doing and what is required from them at different stages of drought.	Following approval of the Drought Plan we will turn the document in to a summary document/leaflet which is customer friendly and housed on our website.
Our ref: CCW12 It would be good to include more detail of early awareness communication programs aimed at informing customers of permitted and excluded water use under a potential Temporary Use Ban and how to make representation, well in advance of any potential TUB. These early communications should be inclusive of vulnerable groups and individuals, as well as those on Priority Service or Additional Service Registers. This will also allow early discussion on discretionary exemptions before any TUB is introduced. It will also help review communication approaches that fit different customer group needs.	The timing of communications around TuBs and exemptions needs to be carefully managed. We have added further details into our Communications Plan (Appendix 1) as follows: As part of extra section added '2.1 - Audience' we have included a reference to our vulnerable audiences and how we engage with them. There is also an extra section added in to 'Section 3 - Implementation Plan' outlining communications to Vulnerable customers specifically.

Your comments	Our response
Our ref: CCW13 We have seen no detail about adding a mechanism to allow customers to challenge the refusal of a TUB exemption, other than by going for a judicial review	We have aligned our process to the Code of Practice, which thoroughly details an evidence-based, best practice approach to the implementation of Temporary Use Bans. Development of the Code of Practice took the views of many bodies including CCW. As the latest version of the Code of Practice does not include a process or mechanism for challenging the refusal of a non-statutory bespoke exception, we have not included any such mechanism within our drought plan, however, if a future update to the code of practice recommends a process for consistent implementation of an appeals process, we will consider adoption of this. Customers are entitled to apply for non-statutory bespoke exceptions, and we will always take a reasonable view of individual circumstances so that exceptions are applied in a fair way.

Table 5 – Our response to CCW

3.5. Environment Agency

The EA made four comments; two requested further clarity on communications with them, and two were technical queries regarding drought risk in three English Water Resource Zones (WRZs). In response, we have amended the Drought Communications Plan and provided further detail on the drought risk assessments to show how we have thoroughly considered and accounted for drought risk.

Our full response to EA's representation is given below in Table 6.

Your comments	Our response
Our ref: EA1 Communications with the Environment Agency In our pre-consultation letter to the company (dated 3 May 2024) we asked the company to clearly set out in the plan when communications with the Environment Agency would begin during a drought and what information would be shared with us. We do not feel that the company has added sufficient detail to the plan to set this out clearly and we look to the company to do so in its Statement of Response and final plan	As per section 3.2.2, we will make our Regulators aware of developing drought and form appropriate lines of communication when needed. In 2022 we provided NRW with a regular dry weather update and we would look to provide this to EA at the same time for information. This communication has been strengthened in setting up the Wales Drought Liaison Group in which this information will also be disseminated.
Our ref: EA2 Environment Agency drought status and communications Section 2.7.6 of the draft plan demonstrates Welsh Water's intention to work with NRW and other partners in Wales to help communicate joint messages to promote water efficiency (for example in locations experiencing environmental stress) during drought. Welsh Water also has abstractions, customers and resource zones in Herefordshire in England (part of our West Midlands Area) and so we ask that the company adds a section (similar to section 2.7.6 of the draft plan) to the Statement of Response and final plan to demonstrate its commitment to working with us and English partners in these locations. In line with our pre-consultation letter, this should have a particular focus on the company customers fed by the Leintwardine Boreholes source (Hereford resource zone), where we have concerns about the sustainability of the abstraction licence which is subject to an ongoing WINEP investigation	We will share information about our communications effort and our resources position with the Environment Agency at the National Drought Group and more directly within our dry weather updates to NRW and EA. We have added text to a new section '2.7.7 EA drought status' to reflect this. Under our current abstraction licence, in terms of availability of water for public water supply, our Leintwardine source is drought resilient. We will continue to work with EA on the Water Industry National Environment Programme (WINEP) investigations to assess the sustainability of the licenced abstraction at Leintwardine. If the WINEP process identifies that a licence change is required, then the consequences of implementing this change will be picked up in our long-term planning process (WRMP29).
Our ref: EA3 Drought risk assessment given current demands for water In the joint regulators (NRW, EA, Ofwat) letter to the company dated 23 December 2024, we set out our significant concerns about Welsh Water's performance on leakage (for Hereford, Ross-on-Wye and Whitbourne zones) and distribution input (for Hereford and Whitbourne zones). We note in the draft drought plan Appendix 2 (Drought Risk Assessment) that the company had similar concerns in its Mid & South Ceredigion zone and therefore chose to class it as "potential risk" rather than its initial "low risk" assessment. Welsh Water should complete an assessment of drought risk using current demands in Hereford, Ross-on-Wye and Whitbourne zones (as it has for Mid & South Ceredigion zone) and present the results and any implications in its Statement of Response and final plan.	We have updated the text in our Drought Risk assessments in Appendix 2 for Hereford (section 5.3.2), Ross-on-Wye (section 5.1.2), and Whitbourne (section 5.9.3) to show that we tested the zones at demands equivalent to recent actual demands, which have been higher than the WRMP24 forecast demands. In all three zones we have shown that the drought risk remains low because we are able to meet the higher recent actual demands. In addition to this, recent actions to target leakage are making an impact and have reduced peak week demand year-on-year in these zones over the last two years.

Your comments	Our response
Our ref: EA4 Drought risk assessment for the Whitbourne zone In addition to our point 3 (above), we have further specific concerns about the company's assessment of drought risk for its Whitbourne zone. The draft plan concludes that Whitbourne zone has a "low risk" to drought and therefore no triggers or specific drought actions have been included by the company for the zone in the plan. During the 1976 drought, records show that the Tenbury gauging station on the river Teme recorded flows as low as 25 Ml/d in late August. Welsh Water should present the drought of 1976 as a scenario in the drought plan to demonstrate it is resilient to this type of severe summer drought. This scenario testing should include estimates of likely summer demand throughout the drought rather than (as in the draft plan assessment) quoting resilience to an assumed October "end of drought" demand (which is presumably well below the likely peaks during the summer months). Welsh Water should undertake this assessment work and present details of the results in its Statement of Response and final plan.	Additional information has been added to section 5.9.3 of Appendix 2 (Drought Risk Assessment) to clarify that we can meet recent actual peak demand. Over the past 15 years, peak demand in the Whitbourne WRZ has occurred anytime between late-April and mid-August depending on when hot weather periods fell in each year. Therefore accordingly, we have tested a worst-case scenario of peak demand coinciding with minimum flows in the Teme. Our peak week recent actual demand was 7.6 Ml/d in 2022. With the addition of 0.55 Ml/d of target headroom, we would require a maximum of 8.15 Ml/d. This can be met within the licence when the River Teme is below its Hands-Off Flow. The flow in the Teme is not only impacted by dry weather but by inputs from treatment plants which add to base flows, this is factored into the Whitbourne abstraction licence. As you have stated, flows in the Teme reached a minimum of 25Ml/d in late August, the lowest in the 68-year long record of the gauge at Tenbury. If this minimum flow were to occur at the same time as peak demand, we would still be able to meet the demand.

Table 6 – Our response to EA

3.6. Farmers Union Wales

Farmers Union Wales's (FUW's) feedback was focussed on compliance with UK Water Industry Research (UKWIR) Code of Practice for Water Use Restrictions, collaborating with Water Resources West (WRW) and the Wales Drought Liaison Group (WDLG), and pre-emptive communication and support for private supplies.

We understand that our adoption of the UKWIR Code of Practice for Water Use Restrictions has proven beneficial to the Farmers' Union of Wales's members. We are pleased that the Farmers Union Wales agree with the value of WRW and WDLG in maintaining communications on water-related issues with DCWW.

Unfortunately, we are unable to provide the level of support highlighted within the comments as these are outside our remit. Although we are unable to offer direct support in the majority of cases to those on private supplies, we agree that we have a role in communicating the potential risks presented by sole reliance on these supplies and in encouraging greater planning for drought. We will therefore continue to work with the FUW and the National Farmers Union (NFU) and relevant Local Authorities to improve communications with the agricultural industry, particularly ahead of and during drought conditions, to ensure a consistent message within the farming community.

Our full response to the representation from Farmers Union Wales is given below in Table 7.

Your comments	Our response
Our ref: FUW1 Code of Practice on Water Use Restrictions (CoP) The Farmers' Union of Wales recognises that the updated UKWIR Code of Practice (CoP) provides a clear and consistent framework for the implementation of water use restrictions, ensuring that all water users are treated equitably and that any restrictions are implemented in a manner that minimizes disruption to businesses, agriculture, and daily life. The FUW is therefore pleased that Dŵr Cymru has adopted UKWIR CoP and that it has already demonstrated effectiveness in assisting DCWW in managing and implementing successful management during the drought of 2022.	Noted.
Our ref: FUW2 Drought Communications The FUW maintains an active interest in water resource management through its associate membership with Water Resources West (WRW), a prominent industry abstractor group. This affiliation demonstrates FUW's commitment to staying informed and involved in water-related issues, particularly those concerning drought and its potential impact on agriculture. The FUW is pleased to see DCWW have made reference to this group in section 3.5 of this draft plan. WRW is expected to publish a Drought Statement of Intent in October 2025 which will set out how it can work with its members to better communicate and improve joint working at times of drought or during dry spells. Additionally, the FUW is a member of the Welsh Government's Drought Liaison Group, a collaborative body that works in close partnership with Dŵr Cymru Welsh Water (DCWW). The Drought Liaison Group has proven instrumental in fostering cooperation and communication among stakeholders, effectively disseminating drought updates and contingency plans. The FUW recognises the value of this platform and advocates for its continued use in sharing critical information.	Noted. Alignment to WRW's drought statement of intent will bring value to Welsh Water, and we have signed up to this. We support the intention to collaborate across sectors to help improve drought management and response. As per our drought plan and drought communications plan, we will work closely with the Drought Liaison Group. When it is convened, we provide the Wales Drought Liaison Group with visibility of our reservoir storage position against our drought triggers, as well as awareness of decisions taken as we encounter drought.
Our ref: FUW3 Support for Private Supplies Due in large part to the location of many rural businesses, private water supplies play a significant role in the provision of water to a large proportion of farming businesses. Whilst the FUW recognises there is a responsibility on private supply owners to have an implementable drought plan, and for the Local Authority to provide support when required, the FUW believes that DCWW should be in a position to provide pre-emptive communications that supports private water users in preparing for drought. This would allow for proactive drought planning and possibly reduce unwanted reactive requests for assistance when a drought occurs. Improved communication between DCWW and Local Authorities would be of significant benefit in this instance alongside continued communications with Farming Unions and other landowner organisations such as the Countryside Landowners Association. The Farmers Union of Wales would also welcome additional support for Private supply owners in the following ways: 1.) Financial Support: Grants for rainwater catchment and containment systems. 2.) Planning and Testing: Revise water percolation tests for planning applications during periods of prolonged dry weather. 3.) Drought Resilience: a.) Promotion of drought-resistant grass and clover varieties. b.) Agri-environmental scheme derogations to offset losses due to prolonged dry weather. c.) Flexible grazing seasons in contractual agreements, contingent on grass growth. 4.) Regulatory Relief: Avoidance of increased bureaucracy during challenging conditions for farmers. We recognise the challenges posed by Drought to Private supply owners and will continue to share industry updates and best practice wherever possible with our members.	We have added a section on our commitment to work with private water users into section 2.2.6 of our Drought Communications Plan (Appendix 1). With regards to your call for support in other ways, whilst we understand these benefits, these are largely within the remit of other authorities to action.

Table 7 – Our response to Farmers Union Wales

3.7. JM (Private individual)

Our full response to JM's representation is given below in Table 8.

Your comments	Our response
Our ref: JM1 - Why is DCWW not promoting integrated catchment management, such as the Bannau Brycheiniog Mega Catchment concept, restoring and re-wetting peatlands, recovering montane and sub-montane dwarf shrub heaths to favourable condition, promoting native woodland regeneration on mid and lower slopes, building woody/leaky dams etc. Therefore, why is DCWW not promoting such measures within its draft Drought Plan? I assume this is because land management is not 'within control' of DCWW? '- How about doing some serious integration and joining up with partners across Welsh Government (e.g. Sustainable Farming Scheme), BBNPA, other local authorities and larger landowners, as well as implementing appropriate measures on DCWW's own landholdings - if necessary by amending farm tenancy agreements to secure delivery?	With respect to the various approaches described in the consultation response, it is worth noting that we own less than 5% of the land in our drinking water catchments, and that the significant majority of our land holdings are tied up in long leases or farm business agreements. As such, it is imperative that we work in collaboration with our key partners and tenants to co-design and deliver measures which will help us meet our obligations. We understand that working collaboratively to deliver our WaterSource approach is key to ensure long-term sustainability of solutions that safeguard the water environment. We have taken opportunities to promote WaterSource activities and share the importance of safeguarding our drinking water sources, for example: through engagement activities and attendance at shows and events, facilitation of partnership groups to explore wider joint working opportunities, supporting Welsh Water's 'Source to Sea' education programme and hosting our award-winning Be PestSmart campaign for local growers and homeowners. Our BBMC Beacons Water Group (BWG) continues to pioneer our approaches for working with farming communities in our catchments. Our Bannau Brycheiniog Mega Catchment (BBMC) Steering Group is actively promoting collaborations between multiple sectors across this historic landscape, which has given rise to a partnership which restored over 160ha of peatland in the central Bannau Brycheiniog area. We are also collaborating with NRW on a number of projects, from delivering local actions through co-funding large schemes like their Four Rivers For LIFE project and supporting the development of the Teifi Demonstrator Catchment partnership. We also sit on wider partnerships like the Sheep Scab Eradication industry group, Wye Partnership, Usk Partnership and Wales Land Management Forum (WLMF) Agri-Pollution sub-group to explore other joint working opportunities to ensure we are aligning with wider environmental policies and strategies. This work has not been covered in detail in our Drought Plan, which is an assessment of our resilience to drought and a plan for how we will manage drought, but more information can be found here: https://corporate.dwrcymru.com/en/community/environment/our-projects/watersource

Table 8 – Our response to JM

3.8. National Farmers Union Cymru

NFU Cymru provided positive feedback regarding our monthly SitRep contribution towards proactive engagement within the WDLG. They also asked how we can support private water supply during drought, and emphasised the need for consistency of communication with the farming community.

We agree that the responsibility for private supplies resides with the Local Authority. We understand our role in ensuring clear communication with the Local Authority so that a consistent message is shared with the farming community about potential and developing drought risks. Dissemination of information regarding long term planning for drought risk is supported through the WDLG and WRW.

Our full response to the representation from Farmers Union Wales is given below in Table 9.

Your comments	Our response
Our ref: NFU1 NFU Cymru is pleased to have been involved in the Wales Drought Liaison Group and has been supportive of moves that position Group on a more permanent footing than previously. The ongoing monthly SitRep process allows for more proactive engagement in drought planning by stakeholders	Noted.
Our ref: NFU2 Farm businesses vary considerably in their sensitivity to water restrictions, and degree of preparations for the expected impacts of local water shortages, but this is an area of increasing importance that needs to be seen against wider policy drives towards sustainable abstraction and climate change adaptation. Farm businesses are also under pressure from a range of other competing demands including escalating costs and inflationary pressures, policy uncertainty and increasing regulatory burdens whilst attempting to remain a viable and thriving part of the rural economy. The specific challenges of a future drought need to be communicated effectively in this environment. Drought sensitivity maybe most acute for those that rely on private water supplies for livestock, household supplies and irrigation. While it is clear from legislation that responsibility for supporting those water users who are on their own private supply resides with the Local Authority, water companies can and do have a role to play with alternative supplies either in an emergency situation or where mains water forms part of a private water supply drought plan on farms. Clearer, proactive communication with the farming community is needed and NFU Cymru would be pleased to work with water companies and local government to ensure a consistent message is shared with farming businesses in Wales. Clear advice for farmers that a Local Authority (LA) can pass on during emergency situations will help streamline responses and proactive communications about the impacts of drought together with advice on avoiding or mitigating the impact will increase preparedness and reduce cost. NFU Cymru would like to see a commitment to the above communications in the text of the Dwr Cymru Welsh Water Drought Plan aimed at private water supplies that would improve the LA response and encourage greater planning for drought, particularly where mains water could be an option or what alternative preparations could look like, for potentially vulnerable farms.	As noted from our one-to-one discussions as part of this consultation, we agree that there is clear legislation and that responsibility for private supply resides with the Local Authority. Although we are unable to offer direct support in the majority of cases to those on private supplies we agree that we have a role in communicating the potential risks presented by sole reliance on these supplies and in encouraging greater planning for drought. In our meeting, we agree that this communication needs to be proactive, and we are happy to work through NFU Cymru, FUW, Local Authorities and other landowner organisations such as the Countryside Landowners Association to ensure a consistent message is shared with farming businesses in Wales regarding access to public water supply ahead of and during dry periods. There is also a role for the Wales Drought Liaison Group and Water Resources West in advising on the water situation for dissemination to the agricultural industry and we will continue to support this process. We have added this commitment to collaborative working with private water users to section 2.2.6 of our Drought Communications Plan (Appendix 1).

Table 9 – Our response to NFU

3.9. Natural Resources Wales

We welcome the detailed response from NRW's which was extensive and technical. 185 comments were provided across a range of topics, and 150 comments of these were regarding the environmental assessments of our supply side drought options. The response was provided in three parts – A publicly available response to the draft Drought Plan, a publicly available response to the Habitats Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA) provided in the context of NRW's role as the Appropriate Nature Conservation Body (ANCB), and an Official Sensitive response to the Environmental Assessment Reports (EARs).

We have provided responses within our statement of response to NRW's comments which were submitted in the publicly available documents. These are briefly summarised in Section 3.9.1.

We have addressed the NRW comments either directly within the SoR or through the inclusion of a proposed work programme. We commissioned environmental consultants to look in detail at the representations from NRW and subsequently met with NRW experts on the 24th March. We understand the concerns raised by NRW regarding HRA, informed by the EAR, which is not seen as satisfactory at this stage. Our consultants have, subsequently, provided us with a high-level scope of works including the collation of additional information, further investigation and collaboration with NRW staff that will enable us to conclude the HRA as requested.

The supplementary programme of works including timescales is appended to this Statement of Response (Appendix 1). We have explained this further, in Section 0, and the programme and have also noted this approach in our revised Draft Drought Plan.

3.9.1. Comments addressed within the Statement of Response

NRW requested some additional information was provided within the Executive Summary. We have responded to include some but not all the requested information and provided an explanation for this decision.

NRW requested that within our main report we clarify aspects around our internal drought management structures and external liaison. We have made amendments to our main plan and our communications plan.

NRW stated that more information would have to be provided on the discussions the company has had with organisations responsible for issuing permits and approvals that are required for our Drought Permits and Drought orders to be implemented. We note that most of our permit and order options will require no such additional permissions but have added lead-in times for required permissions. We have committed to add further detail to this assessment of permissions under the supplementary programme of work.

NRW noted a discrepancy between the descriptions in our plan and Albion Eco's drought plan regarding the contracted supply. We have updated the plan to reflect the current contract and have discussed this with Albion Eco.

NRW questioned whether the drought scenarios and drought risk assessment should be undertaken with actual demand including leakage. We have explained that our strategies are in place to bring demand into alignment with our WRMP forecast, and that we have developed the Drought Action Zone (DAZ) curves using a demand level that is greater than or equal to recent actual demand.

NRW requested that we make available the Appendix G forms (which summarise environmental drought permits and drought orders within the Zonal Summaries) since they are currently not publicly available as per our Security Statement (appendix 13). In response, we have collated these tables into a new, separate Appendix, so that they are publicly available. We will produce this once we have agreed revised outcomes with NRW, so that we can ensure the new appendix is aligned with NRW's consultation feedback.

3.9.2. Comments addressed outside of the Statement of Response

This section is in response to the representations made by NRW concerning our HRA and SEA and associated EARs. This covers the representations as in our references NRW043-NRW179 in the table below.

We acknowledge the concerns raised by that NRW in their HRA response to the Draft Plan that six options have insufficient information provided to rule out Likely Significant Effect at Stage 1 screening stage both on the in-situ and downstream SAC/SSSI designated sites and features. These are:

- 8001-2: Removal of Llyn Cwellyn -10Ml/d abstraction limit
- 8001-7: Llyn Cwellyn – Abstraction below licensed intake

- 8033-34-2: Llyn Bodlyn – Reduce compensation release
- 8121-3: Shon Sheffrey – Reduce compensation release
- 8121-4: Grwyne Reservoir – Reservoir release, to support Prioress Mill or Llantrisant
- 8201-2: Ystradfellte – Reduce compensation release

NRW highlighted in their HRA response to the Draft Plan that one option had insufficient information provided to rule out Likely Significant Effect at Stage 1 screening stage on the downstream SAC/SSSI designated sites and features:

- 8206-1: Crowhill – Reduce the required downstream flow

NRW also agreed that three options had been assessed where potential adverse impacts to SAC/SSSI designated sites and features cannot be ruled out. NRW stated these options required further consideration at Stage 3 (Alternatives Solutions) and Stage 4 (IROPI and Compensatory Measures). These options are:

- 8121-1: Llwyn Onn – Reduce compensation release
- 8121-2: Pontsticill – Reduce compensation release
- 8201-1: Crai – Reduce compensation release

DCWW understand that we need to address the issues raised to comply with the Habitats Directive and Regulations.

We have worked with our environmental consultants to review the issues raised and as requested, we will revise the impact from the seven drought options where insufficient information was available to rule out Likely Significant Effect on the in-situ or the downstream SAC/SSSI designated sites and features. This will involve the review of the Stage 1 screening including the review of additional environmental data, consultation with NRW and agreement of screening outcome. This phase is estimated to take 6 months from the issue of our Statement of Response. At that stage some drought options may be deemed to have an adverse effect, in which case they will proceed to the Stage 3 and Stage 4 assessment as detailed for the three options below.

The development of the Stage 3 Alternative Solutions and Stage 4 IROPI for the three drought options where adverse effect cannot be ruled out would also be undertaken post publication of the Statement of Response. The Stage 4 compensatory measures would be developed in consultation with local NRW representatives and detailed within a Compensatory Plan to be agreed with NRW. The delivery of the Compensatory Plan would be initiated during the lifetime of the Drought Plan and within 24 months of publication of the Statement of Response.

We have attached a draft programme of works as Appendix 1 alongside our Statement of Response submission, providing a breakdown of five workstreams which we will undertake to resolve the outstanding issues NRW raise. We will also issue a formal commitment within the Revised Drought Plan that the drought options that will proceed to Stage 3 and Stage 4 cannot be applied for or enacted until the delivery of their Compensatory Measures is initiated. We also understand that Welsh Ministers will not be able to sign off these drought options until the compensation measures are “secured” as defined in the Habitats Directive, as informed by EU case law and HRA guidance. In the meantime, we trust that our formal commitment may allow the Ministers to direct the publication of our Final Drought Plan under the proviso that the HRA programme of Works continue in agreement with NRW. This approach would allow DCWW to enact the remainder of the drought options included within the Drought Plan should they be required during a Drought.

Our public response to NRW’s representation is given below in Table 10

Your comments	Our response
Our ref: NRW001 • completion of the HRA process for all the drought permits and orders (supply side actions) that we have raised concerns with the draft plan assessment. Where adverse effects have been identified and it is not possible to address our concerns without a programme of work, i) the final plan should include a commitment not to apply for these during a drought until HRA requirements have been met. ii) provide a detailed HRA programme of work with timescales to complete an adequate assessment of alternative solutions, the Imperative Reasons of Overriding Public Interest (IROPI) case and a credible compensation plan setting out how the compensatory measures will be secured during the lifetime of the plan.	We commit to a Programme of Works to complete the HRA process for all drought permits and orders (supply side actions) raised by NRW. We also commit to not applying for those options identified by NRW until HRA requirements have been met. Our statement of response includes a detailed programme of work for the completion of the HRA process.
Our ref: NRW002 • provide a detailed programme of work for the completion of all the other environmental assessments for drought permits or orders that we have concerns with current information presented within the draft plan's environmental assessment reports.	Our statement of response includes a detailed programme of work for the completion of the HRA process.
Our ref: NRW003 • the inclusion of the discussions the company has had and the arrangements for onset, during and post droughts with relevant bodies responsible for granting additional permits and approvals, including those for mitigation measures. This includes assurances that accounted for appropriate lead in times to prepare for and implement these within the timescales the relevant bodies have indicated it may take to consider such requests.	We have added more detail to section 5.3.2 of the main plan. We have added a new Table 19, which includes a list of the potential permissions that may be required alongside the Drought Permit/Order applications, the relevant authority and the determination time. We have added detail about how we would time the applications for these permissions to allow the relevant authority sufficient time to make their determination.
Our ref: NRW004 The company must address within the final plan (and set out work programme) where we have concerns with the EARs for those drought permits or orders that affect European site(s) under Habitats Regulations (refer to section 2.1.2). It is our advice that significant additional information is required before the HRA can be concluded. We expect the company to address within the EARs as soon as reasonably practical through carrying out a programme of work where we have concerns with drought permit or order actions;- i) that are potentially causing 'deterioration' or preventing a water body or a Protected Area from achieving its objectives under the WFD Regulations 2017 and do not impact European site(s) ii) that are likely to impact Section 7 Biodiversity Lists and duty (Species and Habitats) to maintain and enhance biodiversity under Environment (Wales) Act 2016 iii) that are likely to impact species and habitats on Sites of Special Scientific Interest (SSSI) under Countryside & Rights of Way Act 2000 (CRoW Act), if not protected by Habitats Regulations4 iv)where there has been no consideration for the likely impact on ecosystem resilience under Section 6 of Environment (Wales) Act using the DECCA framework Any programme of work should be agreed with us and other relevant regulators, with timescales for completion set out in the final plan.	Our statement of response includes a programme of work for the completion of the HRA process.

Your comments	Our response
Our ref: NRW005 Executive summary The company has included within its executive summary a non-technical overview of its main drought plan. In section iv drought risks and drought actions, the company clarifies that they have concluded eleven of their 23 water resource zones are at drought risk. This means that any customers within these zones may be subject to drought management actions from onset, during and after drought. The company should consider including a drought risk map within its final plan to clearly indicate to customers where these eleven zones are linked to drought actions. It would also be useful to state that whilst the company may not be considering additional drought management actions in the remaining water resource zones, they will still be actively promoting water efficiency messaging and carrying at leakage and pressure management activities to manage resources to manage peak demands and delivery their demand management strategies (link to water resources management plan).	We have amended section IV of the Executive Summary and section 2.6.3 of the Main Technical Report to include a map of the 11 Water Resources Zones for which Drought Action Zones have been derived. We have amended the text of section IV of the Executive Summary and section 2.6.3 of the Main Technical Report to acknowledge that in Water Resources Zones where Drought Action Zones are not necessary, we will still actively promote Water Efficiency messaging, and leakage and pressure management activities.
Our ref: NRW006 Water Sharing Agreements In section 3.6, they set out the agreements with the three New Appointment and Variation (NAV) companies. The information provided in this section regarding the Albion Eco Ltd bulk supply agreement does not align with that provided in Albion Eco's draft drought plan. The company should directly discuss with Albion Eco the arrangements for the bulk supply agreement during a drought and ensure both final plans are aligned. The company has included one site of 250 properties via bulk supply agreement to Leep from Tywi Gower water resource zone. Ofwat has recently granted a new authorisation and variation to Dŵr Cymru for this site on 7 January 2025. Therefore, Leep no longer have bulk supply agreement with the company and the final plan should be amended to reflect this change. We acknowledge that may be other NAV applications within Dŵr Cymru's operating area that are being publicly consulted on by Ofwat and pending the outcomes. If any of these have bulk supply arrangements formally agreed ahead of when the final plan is published, these should also be added.	We have updated the text of our plan to reflect: (1) the agreed terms that DCWW and Albion Eco abide by; that we shall supply up to 18 Ml/d as required, and may provide up to an additional 4 Ml/d as available. (2) removal of reference to the former bulk supply agreement to Leep (3) we have entered into two further bulk supply agreements with NAVs whose licence applications are ongoing with OFWAT. As the licences have not yet been granted we have not included these in the plan.
Our ref: NRW007 Drought experience We welcome the narrative provided in section 2.2 regarding drought experience from 1976-2022. The company notes that they experienced three drought events in 2018, 2020 and 2022. In respect to Wales, in 2018 and 2020 prolonged dry weather was declared within Wales by us and Wales Drought Liaison Group in both years and developing drought status declared by Dŵr Cymru. No formal drought event was declared in those years especially in respect to public water supply. Therefore, it is worth making this clearer in narrative that during 2018 and 2020 'developing drought' (with concerns for peak demand and heatwaves) was announced by Dŵr Cymru to add context.	We have updated the text of section 2.2 to clarify that in 2018 and 2020 a status of prolonged dry weather was declared, but not drought.

Your comments	Our response
Our ref: NRW008 Drought risk narratives We note that there are some discrepancies between the drought risk outcome in Table 6 compared to Appendix 2 narrative. For Dyffryn Conwy, Appendix 2 states that: “We have classified the zone as ‘Low Risk’ based on the results of our detailed risk assessment” Given that Table 6 in the main plan states ‘potential risk’ for this resource zone (based on Llyn Conwy being less drought resilient than Llyn Cowlyd), the text in Appendix 2 should be amended to clarify this. For Blaenau Ffestioniog, Appendix 2 states that ‘‘We have classified the zone as ‘Low Risk based on the results of our supply system modelling. The results used in the plan are from the “with the Afon Gam” scenario. 1. The initial screening (Table 8) shows an ‘Available-to-target’ headroom ratio above 2 throughout the planning period. 2. Detailed analysis of reservoir storage shows risk of very low reservoir storages in Llyn Morwynion if the Afon Gam transfer is not available (Figure 11a). 3. As set out in WRMP24, the Afon Gam transfer has been retained in the modelling, and the results of this modelling are shown in Figure 11b This classified as ‘Low Risk’ owing to its robust supply demand balance. However, as part of the testing of the system, we analysed of the performance of Llyn Morwynion without the Afon Gam transfer active, which indicates it would be very vulnerable to extreme drought events”. Our assumption is that Dŵr Cymru detailed drought risk assessment presented within Table 6 is without Afon Gam source. If this is the case, the company should amend the narrative associated with this table to clarify that its without Afon Gam source and ensure Appendix 2 reflects that they are planning to potential risk (rather than low risk).	Dyffryn Conwy: Despite the risk screening criteria for Dyffryn Conwy returning a classification of ‘Low Risk’, we have chosen to take a precautionary approach and classify it as 'Potential Risk' due to the importance of the zone for tankering elsewhere in North Wales, and the potential vulnerability of the Llyn Conwy reservoir. Section 3.8.2 of Appendix 2 has been updated to clarify this. Blaenau Ffestiniog: The drought risk assessment for Blaenau Ffestiniog is sensitive to whether or not the Afon Gam is available. Use of the Afon Gam is sensitive to flows at the beginning of a drought, so we have taken a precautionary approach and modelled the zone with the Afon Gam being unavailable. This has been clarified in section 3.6.1 of Appendix 2.
Our ref: NRW009 Levels of drought resilience (Levels of Service) Table 9 in the main plan shows the current levels of resilience for the eleven water resource zones. There are some discrepancies between the results shown in Appendix 3 regarding levels of resilience and that shown in Table 9, such as North Eyri Ynys Mon. The company should ensure that the main plan and outcomes in Appendix 3 are aligned.	We have reviewed Table 9 of the main report alongside Tables 16 to 27 in Appendix 3 and have aligned Appendix 3 to match Table 9 where there were slight differences in rounding of return periods. Please note that the resilience levels of both our previous plan (Drought Plan 2020) and our latest plan are presented in Tables 16 to 27 of Appendix 3, and due to updates to our Drought Action Zones, resilience's levels are different between the two plans.

Your comments	Our response
Our ref: NRW010 Drought curve derivation Appendix 3 sets out that the derivation of the drought curves to produce Drought Action Zones (DAZs) for its reservoir sources. The company clarifies that when deriving these drought curves, their modelling has been informed by their WRMP24 supply demand balances. This means they have tested the DAZs by assuming that the demand forecasts set out in WRMP24 will be achieved within the next five years (the lifespan of this draft plan). However, the company has shown for Mid & South Ceredigion that actual leakage (2023/24) is higher than that in its WRMP24. Consequently, through this testing they identified that this affects the drought risk for that zone and this DAZ has been derived to reflect actual demand being higher than planned. Given concerns raised to Dŵr Cymru by us and other regulators recently via an annual review letter7, it is unclear from Appendix 3 'DAZ testing' what impact higher actual demand than planned would have on the system performance validation outputs and DAZs for SEWCUS, Twyi and Pembrokeshire water resource zones. Therefore, the company should consider modelling the drought scenarios with actual demand, including leakage for these zones and provide the system performance validation outputs, resulting modelled drawdowns and DAZs within the final plan.	Within the five-year lifespan of this plan, the implementation of our leakage recovery plan and other demand reduction strategies such as our metering strategy will bring our actual demand into alignment with our WRMP24 forecast. Although performance is behind the starting position for WRMP24, we have developed the DAZs curves and assessed our resilience using the sum of our 24/25 dry year demand forecast plus allowances for outage, losses, and target headroom. The total demand used for DAZ development is higher than the recent historical demand in Tywi and SEWCUS zones, and similar to that for Pembrokeshire, so any impact is mitigated. As we are already seeing our leakage and demand strategies result in lower demand across the region, as presented in recent meetings with regulators, we don't see that this presents any significant risk in terms of our drought response. We will be mindful of this in our response to drought.
Our ref: NRW011 Modelled historic drawdowns Within Appendix 3, the company has included modelled historic drawdowns for each of the 11 WRZs. We appreciate that key recent drought years 1976, 1984 and 1995 have been plotted. It would be useful if 2022 drought year could also be identified in these drawdown outputs within the final plan.	We have added 2022 to our historic plots for the 11 WRZs with storage DAZs.
Our ref: NRW012 Modelled drawdowns events over 2,500 years Within section 1.2 (Assessment of Drought Risk) of the water resource zone summaries (Appendices 7a – 7o) the graphs have been included for the modelled drawdown events for the reservoirs from the 2,500-year sequence stochastic modelling. It is unclear from each graph what type of drought event is being plotted against storage as there are no labels or key provided. The company should consider adding a line to represent 1:200 and 1:500-year drought scenarios to add context.	We have now highlighted and labelled stochastics droughts that are representative of 1:200 and 1:500 year events on the plots in Appendix 3 showing 2,500 years of stochastically generated data.
Our ref: NRW013 Drought Action Zones Dŵr Cymru has used drought curves to produce DAZ (Appendix 3) associated with the reservoir sources for the eleven water resource zones defined as potential or high drought risk. These DAZs are used as the triggers for taking the drought management actions at different stages of drought (as defined by Dŵr Cymru). Specific DAZ information, including the plots have been made available to each statutory consultee, including Natural resources Wales. The company should provide assurances within its final plan that these are made available to any water company including NAVs who may need them to inform their decision making for triggering drought management actions they are responsible for. Each of the DAZs have not been made available in the public domain. The company should consider providing a contact email address for other stakeholders and customers can use if they require further information on DAZs within the water resource zones they are interested in. This would be particularly important in an escalating drought to clarify where the current water storage position is and where it maybe in near future in relation to the DAZ.	We have provided a contact email address in the Security Statement to signpost requests for access to non-public domain information. Access to interested parties will be reviewed on a case-by-case basis.

Your comments	Our response
Our ref: NRW014 Other indicators Within the resource zone summaries, we propose in its final plan, the company expands the main text to incorporate specific information about the rainfall, river flow and groundwater sites it uses and how they use this data as an indicator of developing drought conditions.	We have updated Section 1.1 Drought Triggers in each Zonal Summary (Appendix 7) to include information on the other sources of hydrological information that we consider.
Our ref: NRW015 Lead in times Appendix 3 includes the average time (days) to cross from Drought to Severe Drought Action Zone and then to Emergency Storage for each WRZ. It would be useful if the company could also provide this information for the number of average days to cross from developing drought to drought. This would provide an indicator of the average number of days developing drought actions will be in place before other measures such as Temporary Use Bans (TuBs) may be required.	In Appendix 3 Table 3 - Optimiser Constraints we have stated that the constraint on crossing time from Developing Drought to Drought is set to target 30 day. We have now also added text to tables 16 to 27 to also state the average time to cross from Developing Drought to Drought Action Zones, which is 30 days.
Our ref: NRW016 Demand Management Actions Within Section 3.4 and Appendix 10 the company has set out how they will manage water demand in a drought (linked to its 11 WRZs). We welcome that within its remaining WRZs, where they have no concerns for drought risk – the company is committed to promoting water saving messaging if there are concerns of wider drought impacts from Natural Resources Wales (or Wales Drought Liaison Group) for the environment.	Noted.
Our ref: NRW017 Managing peak demands Within the draft plan, it is indicated that there will be no specific triggers associated with peak demands (due to dry hot weather). They will monitor levels and enhance customer messaging in any affected area accordingly. In these circumstances it is unclear what actions they expect their customers to take due to peak demands so as not to exacerbate their supply position for onset or during a drought. The company should consider providing a clearer narrative within its final plan what specific actions will be taken to manage peak demands.	Our communications plan sets out how we will increase communications as we experience hot dry weather from background messaging to a more targeted approach with greater escalation. We have included more information in the Implementation Plan (section 3 of Appendix 1 Drought Communications plan) to make it clearer how we work with customers both domestic and businesses to reduce peak demands on water.
Our ref: NRW018 Temporary Use Bans (TUBs) Dŵr Cymru has considered the principles within the UKWIR Code of Practice guidance when developing its approach to Temporary Use Bans (TUBs). An outline of legislation relating to TUBs and our views has been provided within section 4.2 (compliance with relevant legislation) of this representation.	Noted.

Your comments	Our response
Our ref: NRW019 Demand Savings The company sets out in Appendix 10 how it intends to monitor the effectiveness of its demand management actions. Section 3.4.8 states that a recent UKWIR project has confirmed Dŵr Cymru estimates of demand savings by the order of 5% for TUBs with the addition of Non-Essential Use Bans (NEUBs) measures in place reducing this by a further 5% to 10%. UKWIR is currently carrying out a feasibility study of how to carry out a cost benefit analysis of implementing NEUBs (Drought Order). This is expected to be reported on shortly. The company should consider its short and long-term recommendations for improving estimates of water savings and economic impacts of NEUBs and include these within its final plan.	The objectives of the UKWIR project were to: (1) confirm if it is possible at the current time, with the data and information we have available, to undertake further work into quantifying the costs and benefits of NEUB implementation; and, (2) to make recommendations on the improvements required for the industry to ensure it is collating the correct information to undertake a robust cost benefit assessment in the future. The project concluded that it was possible to undertake further work, and laid out a roadmap that could be followed in the short-term to result in production of a practitioners guide for undertaking a robust cost benefit assessment. The long-term recommendations were related to the improved information gathering needed to shore up the assumptions that would be used within the practitioners guide, and notably included a survey of business customers to better understand the existing breakdown of business usage by industry and area, and an exercise to improve the understanding of the cost of L4 restrictions. We will undertake work to understand the availability and quality of existing data on business customer industry area, so that we can utilise this information to enhance any cost benefit assessment we make within an assessment using the practitioners guide.
Our ref: NRW020 Non-technical / Executive summary We acknowledge that the non-technical summary/executive summary of the draft plan currently does not contain any environmental assessment results. Given that this may be read in isolation to the main plan, the non-technical summary should contain an overview regarding the outcomes from the environmental assessment, SEA and HRA. This is especially important given that some of the supply-side actions may present an adverse effect to European sites and/or WFD Regs status or protected areas objectives (i.e. deterioration).	We have sought to present an executive summary that is accessible to the general public, and are cautious about making it less accessible by adding in technical information such as outcome summaries of HRA and SEA reports. We will produce summary tables of the SEA and HRA results for our supply-side actions, when these are concluded within an agreed programme of works, and included these within the main report, or a separate new appendix which can be made publicly available.

Your comments	Our response
Our ref: NRW021 Sequence of drought actions The company has indicated they will follow the principle of likely sequencing for initially taking actions during each stage of drought (as set out in Table 1 of the drought plan guidance). However, it is not clear where more than one supply-side action has been identified, what the priority ordering for implementation of these would be. For the final plan, the company should consider incorporating within its resource zone summaries the following; • the likelihood of use of each supply-side action (considering the level of drought resilience); • the likely priority order of each option being implemented or how this decision would be made during a drought; • an indication of which drought actions are likely to be used 'in-combination' (as identified through environmental assessments). This will help inform the environmental assessment requirements as likelihood of use factors into the decision making to determine the expected levels of reporting for the drought plan.	In Sections 1.4 of Appendices 7a to 7o we have added text to state: • the likelihood of use of each supply-side action (considering the level of drought resilience); • the likely priority order of each option being implemented or how this decision would be made during a drought; • an indication of which drought actions are likely to be used 'in-combination' (as identified through environmental assessments)
Our ref: NRW022 Appendix G forms We welcome that a summary of the environmental information for each drought permit or drought order site is included in Table 19 of the main plan and in the Appendix, G forms. It would be beneficial if each Appendix G form within the zonal summaries (which has no national security concerns) could be made available in the public domain to provide more information about each supply-side actions than that provided in Table 19. It would also be useful for the Appendix G forms reference the supporting EAR upon which they are based. The Appendix G forms have identified the overall likely impacts of implementing the supply-side action as Negligible/Minor, Moderate or Major risk. The company should for the final plan also indicate within the Appendix G form where adverse effects cannot be ruled out under Habitats Regulations and whether potential risk to water body status or protected area objectives under WFD Regulations. It is also beneficial to reference any likely impacts to Section 7 lists under Environment Wales Act.	We have made a copy of the Appendix G forms in the zonal summaries and compiled them into a separate appendix (Appendix 14) so that they can be made public. In order to ensure that the information contained in the new appendix is aligned to NRW's consultation feedback (for instance on matters such as conclusions of no Likely Significant Effect) we will publish this once we have agreed the revised outcomes with NRW.
Our ref: NRW023 Communicating with customers and stakeholders Section 4.1 and the Drought Communications Plan (Appendix 1) sets out the company approach to communicating the escalating stages of drought and triggers for key messaging to its customers and stakeholders. We consider the communications plan is mainly focused on customers and stakeholders in relation to demand management actions. We consider that following improvements should be made to the communication approach and the drought communication plan: • the discussions with Natural Resources Wales, Dee Consultative Committee (when convened) and/or the Welsh Government (outside of the Wales Drought Liaison Group) in relation to informing us of their supply-side operational activities from the onset and during a drought .i.e., optimising resources and ensuring compliance with licences and operating agreements • the triggers for and key messaging to Wales Drought Liaison Group (WDLG), other stakeholders and customers about the intention of applying for and implementing drought permit or orders (supply-side). This should include communications around formal notices and arrangements for hearing and inquiries (if required) to any water users, customers and interested parties within the affected area • reference to other water companies, especially NAVs and key messaging to them. This is especially important where NAVS will be responsible for implementing demand actions such as TUBS and NEUBs aligned with Dŵr Cymru's triggers. Note that discussions with Natural Resources Wales and/or the Welsh Government responsible for granting drought permit/orders (supply-side actions) must be included in the final drought plan. In addition, discussions with relevant bodies responsible for granting additional permits and approvals for implementing mitigation measures associated with drought permit/orders – refer to section 4.2 Drought Plan (Wales) Direction compliance of this representation.	Aligned to our NRW26 response, we will share information with NRW/EA as we understand that we are approaching Developing Drought with the frequency and detail within dry weather update notes increasing a drought event progresses. This will include some of the operational changes that we are making to both balance and optimise water resources. As we move towards Drought, we will increase the frequency of updates including our intention to apply for permits or orders and how we will communicate this information. We have provided more information in our Drought Communications Plan in Appendix 1. We have added a new section 2.1 on "Audience" to state how we communicate with our different stakeholders. Additional information has also been added in section 2.2, "Working in Partnership" and to the Implementation Plan in section 3.

Your comments	Our response
Our ref: NRW024 Background Campaign Table 13 includes the target audiences for drought messaging. The company should include WDLG communications subgroup, other water companies including NAVs and note that AMs are now formerly known as Member of the Senedd (MS).	We have added detail on how we communicate with the WDLG, other water companies and NAVs in section 2.2, "Working in Partnership" of our Drought Communication Plan (Appendix 1). References to AMs has been updated to MS (section 4 of the main plan).
Our ref: NRW025 Drought Management response Table 14 sets out the drought management actions and associated key messaging to its customers. The company should amend the key messaging to take account of the points we raised previously around the communications approach, especially in respect to ensuring that key messaging reflects requirements to notify customers of supply-side actions being required and when they will be in place	This has been considered and reflected in Table 15 (formerly Table 14 in the Draft version) section 4 of the main report and the Implementation Plan in the Drought Communications Plan (Section 3, Appendix 1).
Our ref: NRW026 Data exchange arrangements It is unclear from the draft plan and the communications plan the specific data exchange agreements that have been made between Dŵr Cymru and Natural Resources Wales (other than water situation information) from the onset and during a drought. The company should include this and also clarify the data exchange arrangements it has made with the Welsh Government, WDLG, Dee Consultative Committee, other organisations, such as the Environment Agency and water companies including NAVs. It would be beneficial for the company to consider including a table of all the planned (and potential reactive) data and reporting requirements outputs. This table should include the drought status triggers for supplying and/or receiving this data, what the data is, who it is provided by and provided to, frequency of reporting and the channels of communication i.e. being sent via email.	As suggested, we have added in section 2.2.3 on data sharing in our Communications Plan (Appendix 1) and referred to it in Section 3.2.2 of the main plan. We will work with NRW to understand the data and information that NRW and EA would like to see within dry weather reporting as we encounter drought. We would not want to add extensive, frequent and onerous data reporting during times of drought, but we will work with NRW/EA to understand concise data needs are to aid collaboration. We envisage that this will be similar to that provided during the drought of 2022 when we provided information on reservoir storage in relation to drought triggers and output from our models regarding the timescales when we might meet trigger points. We would also provide information on customer demand for key zones and detail of customer communications. We anticipate that we will provide updates at monthly intervals in line with Wales Drought Liaison meetings as we near developing drought and every other week as we pass into this status in line with our drought forecasting. From experience, we do not see rapid change in forecasts as dry weather progresses. This would be sent via e-mail initially with meetings held as we move towards drought. We have added further detail to the Communications Plan (Appendix 1) on how we work in partnership with our stakeholders as part of the Drought Liaison Group and the point at which we will start including data within our update notes as summarised above.

Your comments	Our response
Our ref: NRW027 Drought management structure 1 We welcome that the company has provided information about its drought management structure including set up of its incident centre. It is unclear from Figure 17 that shows the company's internal drought management structure how the other departments such as dam safety, operational services, water engineering and capital delivery fit into this structure. It would also be useful if the WDLG was labelled as an external led group. The company should consider clarifying this within its final plan.	We have clarified the figure showing the Internal Drought Management structure to remove reference to specific departments (Water Resources and Comms Team) and have labelled both the Drought Liaison Group and the National Drought Group as External. It now shows only the command structure between internal and external forums. We have also created a new Water Quality First department, which is separate to our Water Services Science department. The Gold command membership table reflects this, and Section 3.3.2 now contains text differentiating the responsibilities of these departments.
Our ref: NRW028 Drought management structure 2 In section 3.3.1 of the draft plan information is included about who is responsible for representing the company at the WDLG meetings convened by the Welsh Government. However, it is unclear who is responsible for attending the WDLG communications subgroup. The company should clarify within its final plan if this is the Head of Communications	We have updated section 2.2 of the Drought Communications Plan (Appendix 1) to include this information.
Our ref: NRW029 Drought management structure 3 Section 3.3.2 includes the departmental roles and responsibilities from the onset, during and after a drought. It sets out that the water resources team is responsible for contacting Natural Resources Wales regarding the process for applying for drought permits. However, there appears to be no point of contact for communicating with the Welsh Government in respect to any drought order applications. It is also unclear who is responsible for representing Dŵr Cymru at the Dee Consultative Committee when convened. The company should clarify this within their final plan. The company should consider providing a table of the individuals and departmental teams included in the drought management structure and all relevant external organisations/groups that they will the point of contact for (if relevant).	Our text in Section 3.3.2 states "The Water Resources Team will also lead on the application process for our Drought Permit/Drought Order schemes […]". As Drought Orders would be granted by Welsh Government, it would be the Water Resources Team that is responsible for this liaison. We have updated the text to clarify this. The membership of the Dee Consultative Committee is contained within the Dee General Directions. As per the Directions, Welsh Water is entitled to one representative. Our North Area Water Resources Manager would be the DCWW representative.

Your comments	Our response
Our ref: NRW030 End of a drought Section 6 sets out the post drought review process. This section does not include how Dŵr Cymru will be engaging with Natural Resources Wales, the Welsh Government, WDLG and other water companies during this process. The company should identify within this section (and the communications plan) the discussions that will take place with these organisations to inform their post drought review and any other reviews being carried out by others. The final plan should also identify what information they will release to others as a result of the review (e.g., a 'lessons identified' report) and give a clear timetable for the completion of these including any relevant milestones (such as data gathering stage, discussions with regulators, WDLG and report writing stage). We expect them to set out how they will make changes to their Environmental Assessment Reports, drought plan, WRMP and operational response (as relevant) via an action/delivery plan after a review. We also expect them to set out how they will review the contents of their drought plan annually and include an overview of this within their WRMP annual review	As in 2022, we will undertake a post incident review following a prolonged drought event and share information with regulators on the back of this. We have included a new section 6.3 External post-drought review into the main technical report to outline a process for how we will engage with external parties in a post-incident review. The review process will include capturing lessons identified. These lessons will be considered for inclusion in subsequent updates to our Drought Plan.
Our ref: NRW031 The drought plan (Wales) Directions 2017 3c Dŵr Cymru has provided details of the drought permits and orders (supply-side actions) and any additional permit and approvals that they expect to need in order to implement these within Table 18, Table 19 (main plan) and the water resource zone summaries (appendices 7a – 7o). They have also set out within their plan details for non-essential use bans to restrict water use via drought orders. We acknowledge that general discussions have occurred between us and the company regarding the drought permits and additional consents that we are responsible for granting during the development of the draft plan. Regarding arrangements for discussions from the onset, during and after drought, the company does state within its main plan (section 5.3.2) that they would begin discussing these in good time with Natural Resources Wales which is likely when they move into the 'Developing Drought' action zone(s). However, it is unclear about the arrangements for discussions with other relevant organisations. The company must provide information in its final drought plan relating to a) discussions it has had with other relevant bodies responsible for granting permit and approvals during preparation of its draft plan b) the arrangements for discussions with other relevant bodies for the onset, during and after a drought c) ensure that the communications plan includes these arrangements within it	As per the communications plan, we would attend the Environment Agency-led National Drought Group at Developing Drought stage, and provide updates of the current drought situation and actions being taken. We have clarified this in the main technical report. We have added more detail to section 5.3.2 of the main plan around how and when we will apply for the permissions needed for our options. We have added a new Table 19, which includes a list of the potential permissions that may be required, the relevant authority and the determination time. We have added detail about how we would time the applications for these permissions to allow the relevant authority sufficient time to make their determination.
Our ref: NRW032 The drought plan (Wales) Directions 2017 3d Where the draft plan has identified adverse environmental impacts, the company has provided some information on mitigation measures (especially within its EARs and HRA). However, for some the drought permit and order sites we have concerns that there will not be sufficient measures in place to mitigate adverse effect. Refer to our HRA response and Annex 1 for our recommendations for the final plan on measures that may be needed to mitigate any adverse effects on the environment. Linked to Direction 4 (e)	We commit to a Programme of Works to complete the HRA process for all drought permits and orders (supply side actions) raised by NRW. We also commit to not applying for those options identified by NRW until HRA requirements have been met. Our programme of works, as detailed in this Statement of Response, covers how we review whether sufficient measures can be put in place for the drought options.

Your comments	Our response
Our ref: NRW033 The drought plan (Wales) Directions 2017 3e The company has set out the generic permits and approvals that may be needed in order to implement mitigation measures within Table 19 (main plan) and the WRZ summaries (appendices 7a – 7o), such as Flood Risk Activity Permit (FRAP). However, we consider that there are other permits and approvals they may need. For example, fish removal and/or stocking consent and European Protected Species licence and SSSI consent. The company should consider what additional permits and approvals they may require to implement mitigation measures in a drought and set out information in its final plan detailing this. We expect the company to consider the timescales for the relevant bodies to determine these requests for consents, ensuring that they factored these within lead in times to prepare for and implement the mitigation measures for the drought permit or orders if granted. The outcome of 4 (e) will depend on completion of Direction 4 (d).	We have added more detail to section 5.3.2 of the main plan. We have added a new Table 19, which includes a list of the potential permissions that may be required alongside the Drought Permit/Order applications, the relevant authority and the determination time. We have added detail about how we would time the applications for these permissions to allow the relevant authority sufficient time to make their determination.
Our ref: NRW034a The drought plan (Wales) Directions 2017 3f Section 3.7 includes the compensation arrangements that may occur if Dŵr Cymru implement temporary use bans and nonessential use ordinary drought orders. Dŵr Cymru also sets out within section 5.8 the process for those eligible to apply for compensation to follow in the event of losses/ damages from them implementing a drought order. The company must make it clear within its final plan the compensation that they may need to make in the event of losses/damages as a result of implementing a drought permit.	We believe that section 5.8 adequately gives an overview of the application and determination process for compensation to other abstractors due to a Drought Order, although we have now added in information on the level of financial compensation a claimant may be entitled to. The section refers to further details that can be found in Schedule 9 of the Water Resources Act, 1991.
Our ref: NRW034b The drought plan (Wales) Directions 2017 3f They also need to include where legally required, compensation measures for the impacts for designated sites under the Habitats Regulations where it is not possible to mitigate for them. Currently the draft plan does not include compensatory plan for these circumstances. Therefore, our HRA response includes recommendations for the final plan on mitigation measures, alternative solutions, and compensatory plan for designated sites.	Our programme of works, as detailed in this Statement of Response, covers how we review whether sufficient measures can be put in place for the drought options.
Our ref: NRW035 Legislation relevant to demand-side drought management actions (temporary restrictions) [DCWW] state that they would not expect to implement TuBs prior to the Early May Bank Holiday each year and from September onwards depending on their forecasting tools which will look at prevailing weather, to assess any benefit from implementing measures this late in the year. In these circumstances, early discussions with regulators, government, WDLG as well as other relevant groups would be required to justify the reasons why they consider it is not appropriate to implement TuBs. However, we would expect the water company to make it clear within its final plan that they would still have to demonstrate that they have taken effective action including other demand management as early as possible. If they do not, this may risk any subsequent application (if required) for supply-side drought permit or order being granted especially if they damage the environment.	TUBs are an important element of a suite of options to manage demand, and stating that we would not expect to implement TUBs prior to the Early May Bank Holiday does not mean we would not implement any form of demand management prior to this point. We have stated in our plan in Section 3.4.4 that "In regard to the phasing of a TUB we will look to retain maximum flexibility in terms of the activities we restrict and their timing and duration, together with the extent of implementation across our supply area. We need to ensure that any restrictions are effective and do not unnecessarily impact our customers for little or no benefit to our water supply." In ensuring that restrictions are effective and appropriate, we will ensure that we take action as early as necessary, rather than as early as possible. We will of course enter discussions with regulators if these very rare sequence of events were to occur.

Your comments	Our response
Our ref: NRW036 Legislation relevant to Part 5 of the Fire and Rescue Services Act 2004 The company has included Fire and Rescue Service within its communication plan. However, the draft plan does not appear to include any information on how the company will mitigate any reductions in supply for firefighting as a result of their actions as required by Part 5 of the 2004 Fire and Rescue Services Act. This information must be included in the final plan.	We have added information on our support to the Fire Service during any reductions in supply. This information has been added to Section 3.3.3 of the Main Plan and covers communications led by our Fire Service Liaison Manager to inform of alternative sources of water, requests for cessation of non-essential activities and offer DCWW presence to assist with essential activities.
Our ref: NRW037 Public Consultation ...we consider that the company has provided satisfactory opportunities for statutory consultee's, customers, and stakeholders to make representations on the draft plan	Noted.
REDACTED NRW038 to NRW175 regard comments on non-public facing appendices and have been redacted from the publicly available statement of response as per our Security Statement (Appendix 13)	
Our ref: NRW176 We advise that if there is any possibility that an action may be required and enacted at any other time of year to that set out in the drought plan and HRA document, namely in the Spring, then the HRA assessment must be amended to reflect this.	Noted. We will review the possible timings of the actions to ensure confidence in the environmental assessments.
Our ref: NRW177 We advise Dŵr Cymru to ensure that the final plan must set out how they will reassess aspects of the HRA where insufficient evidence has been provided.	This will be reviewed as part of the further programme of works.
Our ref: NRW178 Where adverse effects cannot be ruled out on the site integrity, the drought permits or orders cannot be approved or enacted unless they pass the three legal tests set out in Regulations 64 and 68 of the Habitats Regulations. The three legal tests are to demonstrate that there are no Alternative Solutions, setting out the imperative reasons of overriding public interest (IROPI) case, and agreeing and securing suitable compensatory measures. Until this programme of work is completed and all HRA requirements are met, the company must not apply for or enact these during a drought, and a condition committing them to this should be included within both the final drought plan and the HRA.	Noted. We commit to not applying for the drought options flagged by NRW until the HRA process has been completed.

Your comments	Our response
Our ref: NRW179 The first of the three legal tests is that there are no feasible alternative solutions that would be less damaging or avoid damage to the site than the drought permit or order. They must consider whether any alternative solutions are available. This might include considering whether the proposal could: • happen at a different location • use different routes across a site • change its scale, size, design, method or timing An alternative solution is acceptable if it: • achieves the same overall objective as the original proposal • is financially, legally and technically feasible • is less damaging to the European site and does not have an adverse effect on the integrity of this or any other European site. We therefore expect all financially, technically and legally feasible alternative solutions to be given due consideration at plan level, including existing and other new sources. Regarding the economic cost of alternative solutions, it cannot be the sole determining factor in the choice of alternative solutions considered. In other words, a plan-maker cannot claim that alternatives have not been examined because they would cost too much. The comparisons between alternatives and the proposal in question should focus on aspects concerning the conservation and maintenance of the integrity of the European site and of its ecological functions. In this phase, therefore, other assessment criteria, such as economic criteria, cannot be overruling ecological criteria. With regard to the drought permits or orders where adverse effects on integrity have not been ruled out, we consider that the HRA has not considered whether there are alternative solutions in the current assessment. Therefore, we advise that alternative solutions should considered as part of a programme of work, and assurances provided within the final drought plan that the relevant drought permits or orders would not be applied for until this work is complete.	Noted. All feasible alternate solutions will be considered as part of the further programme of works.
Our ref: NRW180 We do not consider that deferring the consideration of alternative solutions to drought permit/order application stage is an acceptable approach. This is because determination is required within a number of weeks and is therefore likely to mean that some alternative solutions are discounted because they cannot be implemented in the short time required to secure alternative water supplies. If they were considered at plan level, sufficient time to implement them may be available. Giving all alternative solutions proper consideration now means that any investment or planning required could be put in place now i.e. securing a resilient water source for use in a drought. This in turn could reduce the need to apply for drought permit/order that may be more environmentally damaging at a later date.	Noted. Consideration of alternative options will be done as part of the further programme of works.

Your comments	Our response
Our ref: NRW181 Imperative Reasons of Overriding Public Interest - IROPI and Compensatory Measures (Stage 4) If there are no feasible alternative solutions, the company must next be able to show that there are imperative reasons of overriding public interest why the proposal must go ahead. These must justify the proposal, despite the damage it will or could cause to the European site. They must decide if the proposal is: • imperative - it is essential that it proceeds for public interest reasons • in the public interest - it has benefits for the public, not just benefits for private interests • overriding - the public interest outweighs the harm, or risk of harm, to the integrity of the European site that is predicted by the AA The HRA Report does not set out the IROPI case. Until it has been clearly demonstrated that it can pass this test (along with the others set out in Regulations 64 and 68), Natural Resources Wales' advice is that the requirements of the Habitats Regulations have not been met and the relevant drought permits or orders should not be applied for until they are met.	Noted. The IROPI case will be set out as part of the programme of works where required.
Our ref: NRW182 Compensatory Measures If there are no feasible alternative solutions and they have shown that there are imperative reasons of overriding public interest, they need to ensure that compensatory measures will be taken. These measures will need to fully offset the damage which will or could be caused to the European site. Considerations should include: • how technically feasible and effective the measures will be • how financially viable the measures are • how the compensation would be carried out, including how it will be managed and monitored over the time that's needed, and how it's been secured • distance from the affected site - compensation closer to the site is generally preferred, unless measures further away will benefit the network of European sites as a whole • how long the compensatory measures will take to reach the required quality and amount of habitat.	Noted. Where required, compensatory measures will be reviewed as part of the programme of works.

Your comments	Our response
Our ref: NRW183 The company has not considered any compensatory measures within its HRA for those drought permits or orders where it has not been possible to rule out adverse effects on the integrity of European Sites. It is therefore our advice that a credible compensation plan is required where it has not been possible to rule out adverse effects on site integrity. This should be agreed with Natural Resources Wales and Welsh Government. The compensation plan should set out: a. objectives, target features (habitats and species) and ecological processes/ functions to be compensated (reasons, why these measures are suitable to compensate the negative effects) b. extent of the compensatory measures (surface areas, population numbers) c. identification and location of compensation areas (including maps) d. Former status and conditions in the compensation areas (existing habitats and their status, type of land, existing land uses, etc e. expected results and explanation of how the proposed measures will compensate the adverse effects on the integrity of the site and will allow preserving the coherence of the European site f. time schedule for the implementation of the compensatory measures (including long-term implementation), indicating when the expected results will be achieved. g. methods and techniques proposed for the implementation of the compensatory measures, evaluation of their feasibility and possible effectiveness h. costs and financing of the proposed compensatory measures i. responsibilities for implementation of compensatory measures j. monitoring of the compensatory measures, where envisaged (e.g. if there are uncertainties concerning the effectiveness of the measures), assessment of results and follow-up	Noted. Where required, compensatory measures will be reviewed as part of the programme of works.
Our ref: NRW184 Therefore, the time schedule provided in the compensation plan should include a clear implementation plan which includes when agreement with landowners/managers (if required) will be reached. Prior to this agreement being reached with landowners/managers, the necessary compensatory measures cannot be considered to be secure, and therefore any application for drought permit/order at these points are likely not to be granted. A statement is required within the final drought plan to commit to not applying for the relevant drought permits and orders until compensatory measures are secure.	Noted. Where required, compensatory measures will be reviewed as part of the programme of works.

Note Our ref NRW185 – NRW216 were omitted from a previous version of this table	
Our ref: NRW185 2.1 8001.2. Removal of Llyn Cwellyn 10 Ml/d abstraction limit (option 1) and 8001.7. Removal of Llyn Cwellyn 10 Ml/d abstraction limit (option 2) (Afon Gwyrfai a Llyn Cwellyn SAC) The HRA states that option 1 would increase abstraction from Llyn Cwellyn by up to 12 Ml/d when the lake water level is below 140.35 m AOD (however not lower than 138.55 m AOD). For option 2 this would allow abstraction of up to 12 Ml/d to continue when the lake water level is below 140.35 m AOD but not lower than 137.55 m AOD. The HRA has ruled out likely significant effects (screened out at stage 1) for both drought orders affecting Llyn Cwellyn - 8001.2 and 8001.7. We consider that there is insufficient evidence within the HRA to support these conclusions and AA are likely to be required. This is because we consider that the Afon Gwyrfai a Llyn Cwellyn SAC water dependent lake features of Llyn Cwellyn have not been assessed appropriately and do not meet the HRA requirements. "	
Our ref: NRW186 Llyn Cwellyn constitutes part of the Afon Gwyrfai a Llyn Cwellyn SAC and supports these features (with some of the potential risks we have identified) as follows: 1. Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and /or of the Isoteo-Nanojuncetea - at risk from exposure/desiccation, wave action, nutrient enrichment; algal blooms, invasive species 2. Floating water-plantain Luronium natans - at risk from exposure/desiccation, wave action, nutrient enrichment; algal bloom, invasive species 3. Atlantic Salmon Salmo salar - at risk from disrupted passage for migration, compromised spawning, increased predation if held up below fish pass, nutrient enrichment, algal bloom 4. European Otter Lutra lutra - risk to this feature is probably low given mobility to go elsewhere and/or cross dry lake bed The risks also include loss of aquatic plants abundance, distribution, local extinction and impacts on thermal stratification, dissolved oxygen (DO) levels and the mobilising of nutrient enriched sediment changing the distribution of suitable growing conditions for aquatic flora. In addition, salmon movement out of the lake would be impacted too, as there are many small steep feeder streams utilised for spawning by sea trout especially, which when the lake is at such drawdown levels may be difficult for the fish to enter. As a result, it is also our view that the SAC (and SSSI features) found within Llyn Cwellyn should not be assigned 'negligible' sensitivity to increased drawdown from the drought order options. The features Luronium natans, Oligotrophic to mesotrophic standing waters, Arctic Charr (SSSI only), Atlantic Salmon should be classed as of ""Major"" sensitivity given their protected status."	
Our ref: NRW187 2.2 8033-34-2: Llyn Bodlyn – reduce compensation release – (Coedydd Derw a Safleoedd Ystlumod Meirion/ Meirionnydd Oakwoods and Bat Sites SAC) The HRA states that this drought permit would reduce the compensation release normally required from Llyn Bodlyn Reservoir by up to 20%. That is, reduce the release by up to 0.44 Ml/d. A maximum reduction of from 2.18 Ml/d to 1.74Ml/d. The HRA has ruled out likely significant effects (screened out at stage 1). We consider that insufficient evidence has been provided within the HRA and that AA is likely required."	

Our ref: NRW188 Downstream of the reservoir (reach 2), the EAR mentioned that the drought permit would reduce flow in the Afon Ysgethin. Coed Cors y Gedol SSSI underpins the Meirionnydd Oakwoods and bat sites SAC here, and that SSSI is identified in the SAC Core Management Plan2 as having Old sessile oak woods with Ilex and Blechnum in the British Isles as a Key Habitat. The SAC Core Management Plan also states under Management requirements of Feature 1: Woodlands: “Humidity: The uncommon lower plants (mosses, liverworts and lichens) are generally restricted to “hotspots”, often but not always in or close to river gorges where humidity is highest. The requirements vary according to the species, with some species requiring high humidity, but not being able to tolerate total immersion in water, and others requiring total immersion but unable to tolerate periods of drought. The humidity and river flow regime should be sufficient to maintain the common, typical and the rare and scarce lower plants that occur within each individual SSSI/unit.” It also states that “A reduction in the humidity within the gorge woodlands could result in gradual or rapid loss of moss, liverwort or slime mould species especially if ambient humidity levels frequently fall below the high levels required by individual species or communities. Inappropriate tree felling or natural events in key areas can result in damage to the special interest due to reduced shading and thereby reduced humidity levels. Significant water abstraction from any of the rivers, upstream of the lower plant interest, would result in a reduction in humidity that is also likely to be damaging.” It concludes that “N**o** loss of canopy cover or an increase in abstraction from rivers particularly where important lower plant communities occur.	
Our ref: NRW189 In Table B2.3 of the EAR (used to inform the HRA) it states that “Low levels and flows will not significantly impact this SAC”. We consider this statement to be incorrect. Surveys carried out in 20183 and 20214 both concluded that the site is flow-dependent – in other words that flows in the river are important for maintaining the humidity that allows populations of uncommon mosses and liverworts to survive. We are concerned that the likely impacts to flows downstream of Llyn Bodlyn reservoir following implementation of the drought permit could cause prolonged desiccation (beyond the natural drought) within the oceanic woodland SAC, where the desiccation-sensitive bryophytes are close to the river. The extra days of desiccation caused by the drought permit could be the difference between the desiccated colonies recovering and dying. Without further detailed assessment of what flows cause specific colonies to be wetted, we cannot be confident what reduction compensation flow (even up to 20%) would be sufficient for key species to survive. Therefore, we consider that the Llyn Bodlyn drought permit cannot be ruled out of the HRA screening.	
Our ref: NRW190 2.3 8121-3 Shon Sheffrey Reservoir compensation release reduction (Afon Wysg/River Usk SAC and Môr Hafren/Severn Estuary SAC/Ramsar) The HRA states that this drought permit would reduce the compensation release normally required from Shon Sheffrey Reservoir by up to 20%. That is, reduce the release by up to 0.4 Ml/d, reducing it from the licensed requirement of not less than 2 Ml/d, to not less than 1.6 Ml/d. We note that it is likely to be implemented July to December. The HRA has ruled out likely significant effects (screened out at stage 1). We are concerned that the Severn Estuary SAC and Ramsar site has not been included in the screening assessment – which is functional linked to the impacted reaches. We consider that there is insufficient evidence provided within the HRA is rule out likely significant effects at screening stage and that an AA is likely to be required.	
Our ref: NRW191 There appears to be no consideration of the other drought permit or orders within SEWCUS and Tywi WRZs affecting Usk and/or Severn Estuary SACs within the in combination assessment in the HRA (and the EAR).	

Our ref: NRW192 The EAR has identified that sea trout will be subject to a moderate impact in Reach 1 and European eel subject to a negligible impact in Reach 1, which indicates they are present in the impacted reach. The populations of these species in the Sirhowy will contribute to the wider Severn Estuary SAC and Ramsar site population. It is clear there is a potential effect to migrating sea trout and European eel from reducing flows in the reach, and the impact on resident eels is also not recognised or assessed in EAR. Therefore, this drought permit is likely to need to progress to an AA for impacts to sea trout, European eel and lampreys.We consider that further consideration is required for Salmon within the HRA as they are present in lower parts of Sirhowy and Ebbw, along with the conservation objectives set out for the Severn Estuary SAC and Ramsar here: The Severn Estuary / Môr Hafren.	
Our ref: NRW193 We advise that otter should also be given greater consideration, not simply screened out at stage 1. We advise that the assessment for otter should consider that while drop in flows may mean fish congregate and could be easier to hunt for, there could be negative impacts on otter which are not detailed in HRA table for all the sites in South East Wales, including Shon Sheffrey. A reduction in river and tributaries flows will mean fish are found in fewer areas and will be less dispersed across river habitat and tributaries. The HRA could consider whether this means otters may be forced closer together and increase possible territory disputes. Drought periods can force otters to travel further to find hunting grounds, whilst leaving cubs alone for longer putting them at greater risk. This would be more likely to affect the upper Usk than the tidal Lower Usk, however, potential impacts should be detailed in HRA.	
Our ref: NRW194 The impacts of changes to the water quality from lower dilution should be considered for features.	
Our ref: NRW195 2.4 8121-4: Grwyne Reservoir – Reservoir release, to support Prioress Mill or Llantrisant (Afon Wysg/River Usk SAC and Môr Hafren/Severn Estuary SAC/Ramsar) The HRA states that this drought order would release up to 5 Ml/d from the Grwyne Reservoir to support additional abstraction at Prioress Mill or Llantrisant, which will increase flows by up to 59% in reach 1. Note that in other parts of the reports it suggested that releases would be up to 5.41 Ml/d – this needs to be clarified. We have also asked in our main response for clarity about how this drought order will operate as there are some discrepancies within HRA (and EAR). We note that it's assumed to be implemented from August to October.	
Our ref: NRW196 The HRA has ruled out likely significant effects (screened out at stage 1) to the Usk SAC. We advise that there is currently insufficient evidence to support this statement. We consider that a 59% increase in flow cannot be considered as negligible impacts without further HRA justification. Please can the APEM 2024 technical note (referenced in the EAR/HRA) that assessed the change in juvenile salmonid habitat from 59% increase in flow be provided.	
Our ref: NRW197 We are also concerned that the Severn Estuary SAC and Ramsar site has not been included in the screening assessment – which is functionally linked to the impacted reaches within the Usk SAC. We consider that there is insufficient evidence provided within the HRA to rule out likely significant effects at screening stage and that an AA is likely to be required. The HRA should include the Severn Estuary SAC/Ramsar and all the migratory fish features of these sites (River & sea lamprey, twaite & Allis shad, Atlantic salmon, Sea trout and European eel).	
Our ref: NRW198 There appears to be no consideration of the other drought permits or orders within SEWCUS and Tywi WRZs, including the Crai reservoir affecting Usk and/or Severn Estuary SACs within the in-combination assessment in the HRA (and the EAR).	
Our ref: NRW199 2.5 8201-2: Ystradfellte – Reduce compensation release (Coedydd Nedd a Mellte SAC) The HRA states that this drought permit would reduce the compensation release normally required from Ystradfellte reservoir by up to 20%. That is, reduce the compensation release by up to 1.0 Ml/d, potentially reducing it from 5.0 Ml/d to 4.0 Ml/d. We note that it is likely to be implemented between May to October and that the HRA assessment only applies to this period.	

Our ref: NRW200 The HRA has ruled out likely significant effects (screened out at stage 1) to the Coedydd Need a Mellte SAC. We consider that insufficient evidence has been provided within the HRA to rule out likely significant effects to bryophytes and that AA is likely to be required. The SAC Core Management Plan5 states under the Conservation Objectives for Old Sessile Oakwood with Ilex & Blechnum that "bryophytes define this woodland type - further work is required to be able to set suitable limits, but typical ground covering species should be present at high cover in about 80% of the woodland. The range of scarcer species of bryophyte, lichens and filmy ferns should continue to have viable populations." NRW Evidence Report 1466 shows how crucial flows and mist zones are for the maintenance of populations of the oceanic bryophytes typical of Old Sessile Oakwood habitat, whilst NRW Evidence Report 2117 covers Coedydd Nedd a Mellte SAC and identifies which "scarcer species" (in the sense of the Core Management Plan) are present on the site and which of them are sensitive to desiccation. Whilst we accept that there are no flow-sensitive bryophytes in Reach 1 or Reach 2 of the Mellte, two colonies Drepanolejeunea hamatifolia (one of the 'scarce species' typical of Old Sessile Oakwood) occur by the Mellte (Reach 3). The flow-sensitive bryophytes in Reach 3 are highly localised because they are restricted to the mist zone of waterfalls. Further evidence must be provided to prove beyond reasonable scientific doubt that an 8% change from the baseline conditions as result of implementing the drought permit will not significantly impact the bryophytes as it could be the difference between a species surviving and dying. To rule out likely significant effects is likely to require additional information and understanding of how the mist zones alongside Sgwd Clun-gwyn, Sgwd Isaf Clun-gwyn and Sgwd y Pannwr function on a range of different flows.	
Our ref: NRW201 2.6 8121-1: Llwyn Onn – Reduce compensation release (Severn Estuary / Môr Hafren SAC) – Drought Permit and 8121-2: Pontsticill – Reduce compensation release (Severn Estuary / Môr Hafren SAC) The HRA states that these drought permits would reduce the compensation release normally required from Llwyn Onn and Pontsticill reservoirs by up to 20%. For 8121-1, it reduces the release by up to 3.62 Ml/d, reducing it from the licensed requirement of not less than 18.18 Ml/d, to not less than 14.56 Ml/d. For 8121-2, it reduces the compensation release by 3.8 Ml/d, reducing it from the licensed requirement of not less than 19.1 Ml/d, to not less than 15.3 Ml/d. We note that it's assumed to be implemented between July to December.	
Our ref: NRW202 The HRA has concluded that adverse effects on the Severn Estuary SAC or Ramsar (at stage 2) cannot be ruled out both alone or in-combination. Whilst we agree with this conclusion, incorrect conservation objectives have been used in the AA for the Severn Estuary SAC and Ramsar site. The HRA will need to be revised to incorporate the correct conservation objectives which can be obtained here: The Severn Estuary / Môr Hafren.	
Our ref: NRW203 In addition, the Severn Estuary SAC and Ramsar site has an assemblage of diadromous fish species identified as a sub-feature of the Estuaries feature of the SAC and Ramsar site, and feature of the Ramsar site respectively within the conservation objectives. Therefore, impacts on each of the species in the diadromous fish assemblage (Atlantic salmon, sea trout, European eel, river lamprey, sea lamprey, twaite shad and allis shad) need to be considered in the HRA. Specifically, the impacts to sea trout and eels identified in the EARs have not been considered in the HRA, as only salmon has been screened in for Llwyn Onn and Pontsticill.	
Our ref: NRW204 Note that we have challenged the short and long-term moderate and minor impacts on fish within the Taff Fechan and Taff Fawr reaches within the EARs as being understated (Annex 1 of our representation). The in-combination effects of the other drought permits and orders within SEWCUS and Twyi WRZs will also need to be considered on the Severn Estuary SAC and Ramsar site.	

Our ref: NRW205 We also consider that the AA for these drought permits does not contain enough detail to give a clear understanding of the specific impacts to the species populations against the conservation objectives, to be able to either rule out AEOSI or define the assessed harm for compensatory measures under a derogation. Therefore, the HRA requirements of stage 3 and 4 have not been meet. The mitigation measures identified are generic and high level. It will take time to develop specific measures from this outline list, which may not be able to be completed prior to determining a drought permit application. As it's been determined that it is not possible to rule out adverse effects without further assessment, Dŵr Cymru should set out a programme of work within its final plan which sets out when further evidence will be collected. Thereafter, if a conclusion of adverse effects remains, the case that there are no alternative solutions, the IROPI case and the development and agreement of a credible compensation plan is required. Until these actions are completed, these drought permits should not be applied for or enacted, and a clear statement should be made in final plan to that effect e.g., that they will not be applied for or enacted until HRA requirements fully met.	
Our ref: NRW206 2.7 8201-1 Compensation reduction Crai Reservoir (Afon Wysg/River Usk SAC and Môr Hafren/Severn Estuary SAC/Ramsar) The Crai drought order will require a reduction in the compensation release to the Afon Crai (part of the Afon Wysg/River Usk SAC) by up to 20%. That is, reduce the compensation release by 1.36 Ml/d, reducing it from 6.82 Ml/d to 5.46 Ml/d. We note that it's assumed to be implemented between June to October and that the HRA only applies to this period.	
Our ref: NRW207 The HRA has concluded that adverse effects on the Afon Wysg/River Usk SAC (at stage 2) cannot be excluded. Whilst we agree with this conclusion, we do have concerns with the assessment has not considered Twaite shad within the Usk SAC assessment. There has also been no consideration for the Severn Estuary SAC and Ramsar site. The HRA should include the Severn Estuary SAC/Ramsar and all the migratory fish features (River & sea lamprey, twaite & Allis shad, Atlantic salmon, Sea trout and European eel). The incombination assessment needs to also consider the other drought permits and orders within or affecting the Usk SAC, as well as the Severn Estuary SAC. Given that we have concerns for the Usk and Severn Estuary European sites including their migratory features, we consider that the zone of influence (study area) needs to be extended to account for local sensitivities, SAC flow targets and functional linkage beyond the Usk confluence.	
Our ref: NRW208 Whilst we agree that the reduction of compensation flows from the Crai reservoir option may have adverse effects (as identified within the HRA), we have significant concerns that the extent of these impacts on the SAC has been understated. This is because this tributary is one of the best salmon spawning tributaries, and any flow impact (even moderate) predicted over more than 9km (as stated in the HRA and supporting EAR) could have a potentially devasting impact upon the stock of salmon within the River Usk SAC. We therefore consider as result that there is likely to be major impacts on this SAC feature.We also consider that the statement that impacts upon salmon are temporary and reversable is incorrect. Atlantic salmon stocks are at all time low numbers and there is real risk of stock collapse. Therefore, there are not surplus spawners that would ensure impact reversal. It is likely that any loss of juvenile salmon may mean a permanent loss to the catchment (and/or tributary) and may be irreversible by natural means. For this reason (amongst others) moderate should be changed to major.	
Our ref: NRW209 We are concerned that the water quality assessment has largely only taken account of the potential risk to WFD Regs water body status for DO and ammonia and has not sufficiently considered conservation objectives (linked to the SAC). We note that there has been no consideration of temperature and phosphorus.	

Our ref: NRW210 As with the other drought actions where adverse effects on site integrity have not been ruled out, in order to include this within the drought plan, Dŵr Cymru are advised to set out the case that there are no alternative solutions, the IROPI case and develop and agree a credible compensation plan as set out in Annex 1. Until these actions are completed, this drought order should not be applied for or enacted, and a statement made in final plan to that effect e.g., that it will not be applied for or enacted until the HRA requirements are fully met.	
Our ref: NRW211 2.8 8206-1 Flow reduction Crowhill (Afon Cleddau/Cleddau Rivers SAC and Pembrokeshire Marine/ Sir Benfro Forol SAC) This drought order involves a reduction in the abstraction 'hands off flow' conditions by 20% at the Crowhill. That is, a reduction of 7.52 Ml/d, reducing the limiting flow set in the abstraction licence from 37.58 Ml/d to 30.06 Ml/d. All the other conditions of the abstraction licence remain unchanged. It is likely to be implemented during June to November inclusive. However, some of the assessment within the EAR (of which this HRA is based) appears to only cover the period of July-November or less.	
Our ref: NRW212 The HRA has concluded no adverse effects in the Afon Cleddau/Cleddau Rivers SAC and Pembrokeshire Marine/ Sir Benfro Forol SAC. We consider that insufficient evidence has been provided within the HRA to rule out adverse effects to the SAC features. We are concerned that the HRA (and EAR) has not sufficiently highlighted that the current licence requirements were changed under the Habitats Directive Review of Consents (HD RoC). A lot of work has been undertaken to identify site-specific impacts of the current licence and an acceptable abstraction regime, to enable Dŵr Cymru to continue abstracting beyond the standard EFI / HD flow standard.Further changes to the licence during a drought would go beyond what we consider acceptable. As identified through ongoing discussions regarding HRA concerns for this drought order since the previous drought plan, any additional abstraction proposed under the drought order (even if it is revised from the previous plan) is likely to cause impacts to the SAC. In essence, until further evidence is provided, we believe that the drought order could lead to adverse effects to sea lamprey, river lamprey and brook lamprey SAC features, and other features, such as bullhead, may also be affected. The reach immediately downstream of the Crowhill drought order site has been identified as being particularly sensitive to reductions in wetted width as it is a key habitat for lamprey within the Cleddau SAC. This does not appear to have been considered. There is also insufficient detail on Town weir fish pass and Crowhill weir where fish will be attempting to negotiate passage past structures in low flows.	
Our ref: NRW213 Table B.5 & B.6 (conservation objectives for the features of the Pembrokeshire marine SAC) shows the feature condition performance indicators (a subset of the conservation objectives) and result of the last condition assessment of the feature when it was last assessed, as opposed to the conservation objectives for the feature as per the title. The AA should use the correct conservation objectives for each species features to assess the potential impact of the drought order. Note that we are currently in the process of assessing the condition of the Pembrokeshire Marine SAC, due for completion end-March 20258. In general, the AA for the drought order does not contain enough detail to give a clear understanding of the specific impacts to the species populations against the conservation objectives of the Pembrokeshire Marine SAC, to be able to rule out adverse effects.Allis and Twaite shad have not been included in Table B.6 as migratory features of the Pembrokeshire Marine SAC. These species have also been omitted from the EAR.	
Our ref: NRW214 We are concerned that the water quality assessment has largely only taken account of the potential risk to WFD Regs water body status for DO and ammonia and has not sufficiently considered conservation objectives (linked to the SAC).	
Our ref: NRW215 There may also be impacts on Ranunculion fluitansis and Callitricho-Batrachion habitat that need to be considered.	

Our ref: NRW216 The mitigation measures identified are generic and high level. It will take time to develop specific measures from this outline list, which may not be able to be completed prior to determining a drought permit application. As we disagree that adverse effects can be ruled out Dŵr Cymru should set out further evidence within its final plan. Thereafter, if this confirms the conclusion of adverse effects, the case that there are no alternative solutions, the IROPI case and development and agreement of a credible compensation plan is required. Until these actions are completed, this drought order should not be applied for or enacted, and a statement made in final plan to that effect e.g., that they will not be applied for or enacted until the HRA requirements are fully met.	

Table 10 – Our response to NRW

3.10. Ofwat

Ofwat provided eight comments. While they stated that the Plan meets their overall expectations, they had queries over the impact of leakage with respect to drought risk and public perception. Our response acknowledges that while current demand is higher than WRMP planned demand, our drought risk assessment has conservatively used demand in line with recent actual demand levels and that we have confidence in the strategies and resources in place to reduce leakage and demand down to forecast WRMP levels.

Ofwat also requested further details on our communication and collaboration strategy, to which we have responded by adding this information to our Drought Communications Plan.

Our full response Ofwat's representation is given below in Table 11.

Your comments	Our response
Our ref: OF1 Overall, Dŵr Cymru's draft drought plan 2025 meets our expectations for this stage of drought planning, for the areas which are a priority for Ofwat. The plan sets out the triggers and subsequent drought interventions required in the 2025-30 period. This includes how this delivers the level of service for customers and the communication strategy to implement this. However, there remain some aspects of the plan that should be improved by providing additional clarity and context. Our feedback on these points can be found in the appendix to this letter below.	Noted
Our ref: OF2 WRMP19 leakage performance and WRMP24 starting position The 2023-24 WRMP19 annual review raised risks around Dŵr Cymru's leakage being significantly off-target in relation to its WRMP19 forecasts. The company's final WRMP24 includes details of the risk this poses to meeting the WRMP24 supply demand balance (SDB) starting position in the SEWCUS, Mid & South Ceredigion and Lleyn Harlech-Barmouth Water Resource Zones (WRZs). In the drought plan Appendix 3, the company has shown that for the Mid & South Ceredigion WRZ, actual leakage (2023-24) is higher than that presented in its WRMP24. The drought plan has tested the subsequent risk to drought resilience for this zone, and a Drought Action Zone (DAZ) has been set up to more closely manage demand in the WRZ. The draft drought plan does not apply the same sensitivity testing to the SEWCUS and Lleyn Harlech-Barmouth WRZs, which the WRMP24 highlights as also at risk of maintaining a surplus due to higher than forecast leakage levels (albeit under an annual average as opposed to annual profiled scenario). The draft drought plan also does not include sufficient and convincing evidence as to how the company will mitigate against loss of resilience and level of service in these WRZs in the event of not being able to achieve its WRMP24 starting position for leakage. In its final drought plan, Dŵr Cymru should clearly acknowledge where there are risks of not meeting and maintaining its forecast WRMP24 SDB surplus, particularly where this is related to leakage being off track. The drought plan should acknowledge where this may result in subsequent impacts on resilience and would then influence approaches to managing droughts. For the SEWCUS and Lleyn Harlech-Barmouth WRZ's, the company should also test drought scenarios with actual demand / leakage levels (as it has done so for Mid and South Ceredigion). This should include evidence as to how the company will mitigate against a loss of resilience and level of service in the event of not being able to achieve its WRMP24 starting position. As part of the WRMP annual review process, we will continue to monitor and assess progress and risks associated with leakage across WRZs. This includes leakage level improvements across all WRZs, in addition to the priority WRZs where risks to the SDB surplus have been identified.	As reported in our Annual Review our leakage is currently above target, and we are working in-line with our Service Commitment Plan to improve performance to align this with our WRMP24 forecasts as soon as we are able in AMP8. We have developed our Leakage and PCC strategies and are reporting on performance to Regulators more frequently (See Annual Review reporting). We acknowledge that this presents a short-term lowering of water resource resilience away from our target levels of service (LoS) for some zones. For many zones, we have sufficient headroom such that we are meeting our preferred LoS. However, our drought control curves have been developed including for uncertainty and an outages allowance and this means that the Drought Control Curves are positioned to allow for demand that is higher than the final plan position within the WRMP24. We can confirm that for both SEWCUS and Lleyn Harlech Barmouth, drought action zones were developed using demands that were higher than those forecast in WRMP24. We are targeting demand management reduction towards our zones with least water resource resilience and we will continue to report on progress at a water resource zone level.

Your comments	Our response
Our ref: OF3 Stakeholder and customer engagement – Level of service We welcome that stakeholder and customer engagement has been undertaken and presented in the draft drought plan. This includes research on public perception of drought resilience, temporary use bans (TUBs) and non-essential use bans (NEUBs), including the response to the 19 August 2022 TUB implemented in Pembrokeshire and Carmarthenshire. Feedback and insights to customer preferences appear to have been used to develop and improve aspects of the company's drought and communications plan. Customer engagement is also cited as a determining factor in setting acceptable restriction frequency and resilience levels, including 1-in-20-year TUBs, 1-in40-year NEUBs, and moving from a 1-in-200 to 1-in-500 year emergency drought order in line with the ambition set out in WRMP24. Whilst the main purpose of the drought plan is to focus on the company's response to drought events in the 2025-30 period, before the move to 1-in-500-year resilience is achieved, the plan does not provide further detail on how the drought plan may change in the medium to longer term to meet this ambition. This includes how it has engaged with customers on the specifics such as timescales for meeting 1-in-500-year resilience or early indications as to how drought actions may then change to managing more extreme events.	Our drought Plan reflects the same Levels of Service as our WRMP24, aligned with our customer expectations as understood through our consultation work, and covers our tactical response to drought for the period 2025 - 2030. Our plan will not change over this period. As per our WRMP24, the effect of our demand management strategy will be to reduce demand over the medium to long term, supporting an improvement in our level of service from 1:200 now to a target of 1:500 in 2039/2040. At this reduced demand level, drought actions will be needed less frequently and as such, we will not be adding drought options in order to achieve a 1:500 LoS. We will review the need for drought schemes within zones as our LoS is improved aligned to customer and stakeholder views. We have added text to section 2.6 to reflect this.
Our ref: OF4 Stakeholder and customer engagement – Communications plan The drought plan has a clear communication strategy tailored to different audiences. The plan incorporates customer feedback on drought, supply options, and demand management through customer engagement activities. However, the company does not reference the communications strategy for other water companies and NAVs, including key messaging. This is particularly crucial where NAVs will be responsible for deciding when to implement their own drought actions and demand restrictions, such as TUBs and NEUBs.	We have added additional details on our communications strategy toward New Appointments and Variations (NAVs) in our Communications Plan (Appendix 1). Section 2.2 details how we work in partnership with other organisations.
Our ref: OF5 [...] Dŵr Cymru should provide further context in its final drought plan on how its drought plan will align with the medium-longer term resilience ambitions set out in WRMP24. Specifically, this includes how the plan may change when it intends to reach the 1-in-500-year drought resilience ambition, in line with customer and stakeholder engagement. Where possible, this could include how the current levels of service may be maintained or changed within the longerterm strategy, and any early indications as to how current drought options may be impacted by the longer-term resilience ambition. In its final drought plan, Dŵr Cymru should provide additional narrative on the potential risks and impacts to customers should the company not achieve its WRMP24 starting position for leakage.	We have undertaken our Drought Resilience Assessment at or above the current levels of demand for all zones. In addition, demand is reducing as a result of our leakage and demand management strategies. Therefore, the level of risk that we have presented is aligned to our current position and resilience is expected to further increase over the next five years as we bring demand below our WRMP24 starting position. We have added text to section 2.6 to reflect this.
Our ref: OF6 Stakeholder and customer engagement – WRW statement of intent Water Resources West (WRW) is due to publish its drought plan statement of intent in October 2025, which will set out how they will work with Dŵr Cymru (for the WRZs that are included in WRW's region), water company customers and the environment during dry weather or drought conditions. Dŵr Cymru's drought plan does not state how it intends to align with WRWs upcoming statement of intent, or highlight areas where it will not align (for example, due to requiring to align with the Welsh Drought Directive instead). In its final drought plan, Dŵr Cymru should include commentary on where its drought plan will be aligned with WRW's drought statement of intent when it is published in October 2025. The company should also comment on any areas it is not expected to align on, due to needs such as meeting the Welsh Drought Directive requirements.	Alignment to WRW's drought statement of intent will bring value to Welsh Water, and we have signed up to this. The Statement of Intent allows for flexibility of approach between companies on aspects such as communications and messaging, and we have included text in Section 3.5.1 to this effect. We have also updated the text to note the status of the Statement of Intent with the aim that this will be finalised prior to reporting of our final Drought Plan.

Your comments	Our response
Our ref: OF7 Water sharing and bulk supply agreements As part of the draft drought plan, Dŵr Cymru sets out agreements with three NAV companies. The description provided for the Albion Eco Ltd bulk supply agreement does not align with the information provided in Albion Eco's draft drought plan. Dŵr Cymru's plan sets out a bulk supply agreement of a maximum of 18Ml/d of non-potable supply, plus an additional potable supply of 2 Ml/d for processing and 1 Ml/d for domestic use. Albion Eco's plan sets out 18 Ml/d of nonpotable supply plus an additional 4 Ml/d (non-specific on potability) subject to availability. Any changes to NAV applications or bulk supply arrangements formally agreed ahead of the publication of the final plan should be included. For example, the company has included a bulk supply agreement to Leep from Tywi Gower WRZ. However, Ofwat has recently granted a new authorisation and variation for this site back to Dŵr Cymru on the 7 January 2025. As Leep no longer have a bulk supply agreement with the company, the final plan should be amended to accurately reflect this change. Dŵr Cymru should ensure that its final drought plan aligns with Albion Eco Ltd's drought plan in its expectations of and arrangements for bulk supply agreements. The final drought plan should accurately reflect any updates or changes to bulk supply agreements that are formally agreed ahead of publication, including arrangements with Albion Eco Ltd or any other NAV company.	We have updated the text of our plan to reflect: (1) the agreed terms that DCWW and Albion Eco abide by; that we shall supply up to 18 Ml/d as required, and may provide up to an additional 4 Ml/d as available. (2) removal of reference to the former bulk supply agreement to Leep (3) We are entering into three further bulk supply agreements with NAVs whose licence applications are ongoing with OFWAT. As the licences have not yet been granted we have not included these in the plan.
Our ref: OF8 We note that customer research highlighted a perception that Dŵr Cymru should be doing more to deal with leakage and pressure on the local supply if asking individuals to cut down their own usage. Dŵr Cymru's draft drought plan does not present sufficient and convincing evidence that it has taken into account this feedback, including presenting the potential impacts to customers should it not achieve its WRMP24 starting position for leakage (see feedback on 'WRMP19 performance and WRMP24 starting position – Leakage' above).	While we acknowledge that customer research feedback following the Pembrokeshire TUB in 2022 included comments that DCWW should do more to deal with leakage if asking customers to reduce their usage, this should be considered in the wider context of the research findings. 35% of customers felt more positively towards Welsh Water as a result of the TUB, and perceived that the TUB was done 'for the right reasons', whereas 7% felt more negatively and expressed that more could be done to deal with leaks when asking individuals to cut down their own usage We accept the general principle that we should aim to reduce leakage to acceptable levels and our plans are to do this. The reduction of leakage is a long term aim as presented in our WRMP24 and not one which will be met over the timescales of a drought, however we do take action to target leakage in drought impacted zones if needed. Planning and moving resources to tackle leakage in response to dry weather needs to be carefully considered to ensure we can still efficiently deliver leakage reductions.

Table 11 – Our response to Ofwat

3.11. Severn Trent and Hafren Dyfrdwy

Severn Trent and Hafren Dyfrdwy's feedback was focussed on confirming the willingness to collaborate with DCWW in the following ways:

- Continued collaboration within the water industry
- Aligning communications at an early stage of drought
- Working together in managing Elan Valley during drought
- Educating private water supply owners on drought
- Collaborating with WRW work

We confirm that we welcome a collaborative approach and will continue to reach out to Severn Trent and Hafren Dyfrdwy and via WDLG and WRW. We understand the benefits of aligning messaging for cross-catchments where possible, to mitigate the impact of a drought situation and to ensure awareness from our customers.

We appreciate the Elan valley reservoir system is an important resource to Severn Trent and we will ensure to work even more closely on the management of this resource during a drought period.

We agree that DCWW and Severn Trent and Hafren Dyfrdwy have a role in providing a clear and consistent message to the Local Authorities regarding drought communications, as they have responsibility for the Private Water Supplies management. We would be happy to contribute towards proactive education of farmers regarding drought planning and resilience.

We welcome your support of the regional drought response within the Water Resources West Drought Statement of Intent and we will continue to collaborate to improve drought management process and response.

Our full response to Severn Trent and Hafren Dyfrdwy's representation is given below in Table 12.

Your comments	Our response
Our ref: ST1 We would like to encourage continued collaboration between our organisations as it will be beneficial for all of us. This could include activities such as joint workshops, sharing of drought experiences, developing educational materials and communications.	We welcome a collaborative approach and look to achieve this as part of the drought Liaison group and Water Resources West. We would also welcome by-party meetings on specific subjects such as consistency of approach on non-public water supplies for example. We have added further information on this to our "Working in Partnership" section of the Drought Communications Plan (section 2.2 of Appendix 1).
Our ref: ST2 We would like to continue working together to align our messaging to ensure that, where appropriate, we make sure that hot/dry weather (peak demand) and drought messaging is consistent between Welsh Water, Severn Trent, Hafren Dyfrdwy and the associated NAVs within our supply areas. Where appropriate, such as when conditions are comparable, coordination of this could be facilitated by Water Resources West, and for Hafren Dyfrdwy also with the Drought Liaison Group (Wales). Proactively increasing alignment at an early stage will help to alleviate a drought situation should it develop, ensuring that we minimise the risk of customer confusion while improving the clarity and thus effectiveness of all of our messages. This is especially important for catchments that span multiple company areas such as the River Severn and River Dee catchments. However, our areas have differing climatic conditions and hydrological regimes, so alignment may often not be possible. Furthermore, alignment will assist with fulfilling the requirements of the updated “Water company drought plan – technical guidance”	Agreed. We are supportive of working together to align messaging and approach as appropriate bearing in mind the water situation within each water resource zone at any time.
Our ref: ST3 During droughts we would like to continue working together to manage the Elan Valley reservoir system, which supplies Severn Trent with water. We will include this in the Severn Trent draft drought plan which we are currently updating and publishing later this year in October.	We will continue to work closely with Severn Trent on the management of the Elan Valley reservoir system.
Our ref: ST4 We are also keen to progress our work together on private water supply insufficiency of supplies education for farmers, which we are focusing on due to the topic being raised during our Hafren Dyfrdwy draft drought plan consultation. This will ensure that we all deliver a consistent message across Wales and the adjoining Severn Trent area, which will benefit these private water supply users as they will have a better understanding of their responsibilities and how to request assistance via their local authority if they experience insufficiency of supply.	We also received feedback from FUW and NFU Cymru on the importance of supporting private water supply users. Whilst we acknowledge that the responsibility for direct support lies with Local Authorities, we have an important role in communicating and providing a coordinated message with other organisations. Key to this is our joint participation in the Wales Drought Liaison Group and Water Resources West. We have added a section stating our commitment to supporting private water supply users to section 2.2.6 of our Drought Communications Plan (Appendix 1).
Our ref: ST5 We will also support the regional drought response in-line with the Water Resources West Drought Statement of Intent, which describes the actions and activities that Water Resources West may carry out during a drought to support members of the regional planning group	Alignment to WRW's drought statement of intent will bring value to Welsh Water, and we have signed up to this. We support the intention to support collaboration across sectors to help improve drought management and response.

Table 12 – Our response to Severn Trent and Hafren Dyfrdwy

3.12. Water Resources West

Water Resources West provided comments around the Drought Statement of Intent, UKWIR Code of Practice on Water Use Restrictions, the importance of regionally consistent data, assumptions and communications, and support for private supplies users.

We support the WRW Drought Statement of Intent, which is due to be published in October 2025 and we appreciate the value of joint working across its members. We have confirmed this commitment to Seven Trent and Hafren Dyfrdwy in their individual feedback and intend to collaborate across sectors to help improve drought management.

We understand that a drought is a difficult time for those relying on a private water supply. We have received feedback separately from NFU and FWU highlighting the need for proactive and consistent communication during such a period. We have agreed to work with the NFU, FUW, Local Authority, other Landowners and Water Companies in educating private supply users about drought management. The WDLG and WRW will be key in contributing towards the dissemination of this messaging across communities.

Our full response to WRW's representation is given below in Table 13.

Your comments	Our response
Our ref: WRW1 Role of Water Resources West in a drought We welcome the references to WRW in Section 3.5 of your draft plan. As you have noted, we are producing a "Drought Statement of Intent", that sets out how we will work together, to benefit abstractors, water company customers and the environment during dry weather or drought conditions. The Statement identifies areas where it may be beneficial for members of WRW to work together, such as in our drought communications activity. However, it also recognises that any joint working should only be undertaken where beneficial to do so, noting how intense a drought is for those working in drought affected areas. WRW is not seeking to add to this pressure by creating additional, unnecessary coordination activity. We intend to publish our WRW Drought Statement of Intent in October 2025. [...] Furthermore, our Drought Statement of Intent sets out how WRW members will seek to align their drought communications wherever appropriate. WRW's customer and stakeholder management group will support the members in the alignment of communications across WRW. However, it should be noted that WRW is a large and diverse area, with differing hydrological characteristics. Therefore, at any time in a drought event, different parts of the region may be at different levels of drought response.	Alignment to WRW's drought statement of intent will bring value to Welsh Water, and we have signed up to this. We support the intention to support collaboration across sectors to help improve drought management and response.
Our ref: WRW2 Code of Practice on Water Use Restrictions We are pleased to see that you have adopted the updated UKWIR Code of Practice on Water Use Restrictions. We encourage all water companies to adopt this as a consistent approach to restrictions will make it easier for the public to understand what is expected, and more likely that they will adopt the water saving behaviours.	Noted
Our ref: WRW3 Regionally Consistent Data and Assumptions Through their work on developing a regional plan and consistent WRMPs, the water company members of WRW have adopted consistent data and assumptions where appropriate. This includes, for example, consistent assumptions on the import and export of water between companies. We are pleased to note that you have used the same assumptions in your Drought Plan as you have in your WRMP. This will ensure wider regional consistency.	Noted
Our ref: WRW4 Consistent Drought Communications We are pleased that you have retained four levels, ranging from normal to severe drought, to categorise your drought actions. WRW member water companies agreed to adopt these in 2020. This is designed to ensure that the drought plans are consistent and coherent to customers, stakeholders, governments, regulators and the media. These levels will be used to support consistent drought communications.	Noted

Your comments	Our response
Our ref: WRW5 Support for Private Supplies In times of drought those with private supply abstractions can see their sources dry up. Such private supplies are mainly a feature of rural areas, and could be households or farms. Welsh Water recognises that this can be an important issue and has set out a process by which support can be requested via local authorities. We encourage you to engage with NFU and Farmers Union of Wales, who are also WRW members on this topic. WRW can support with engagement between water companies and across sectors if consistency is helpful, with crosssector communications in times of drought, and aid mutual understanding of risks and statutory duties. We can also look to pursue opportunities to support resilience of these non-public water supplies	We met with the NFU to discuss the resilience of non-public water supply sources and how these are governed. We have agreed to work with NFU Cymru, FUW, Local Authorities, other landowner organisations and water companies in Wales in educating private water supply users in understanding the resilience of supplies and encourage greater planning for drought. In our meeting, we agreed that this communication needs to be proactive and the role of the Wales Drought Liaison Group in advising on the water situation for dissemination to the agricultural industry. It may be useful for this collaborative engagement to be undertaken through the Water Resources West group. We have added a new section 2.2.6 to our Drought Communications Plan (Appendix 1) to outline our support to private supply users.

Table 13 – Our response to WRW

4. Next Steps

All feedback and representations provided by our consultees is taken into consideration in the preparation and publication of our 2025 final Drought 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; 25th April 2025
- Review of Statement of Response and revised draft Drought Plan by Welsh Ministers; May – June 2025
- 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/our-services/water/water-resources

If you require any further information please contact:

water.resources@dwrcymru.com

Appendix 1 – Proposed Post-SoR work programme

Review of NRW Representation

Our environmental consultants 'Ricardo' produced the Environmental Assessment Reports for the Dŵr Cymru Drought Plan and following a meeting with NRW have reviewed their response on the draft plan and categorised the work required and formulates a programme of works needed. This needs to be agreed with NRW, to enable the finalisation of the Dŵr Cymru Drought Plan 2025.

Our consultant's view is that some feedback requires relatively simple alterations to the submission, whilst others are more complex. In addition, some are confined to specific aspects of a EAR or EMP whilst others relate to the HRA of options. The latter will also have implication for the SEA of the overall plan. Before the HRA and SEA of the overall plan can be updated, all the EAR, EMP and option specific HRA feedback needs to be resolved.

In respect of the HRA, NRW consider that the information provided for some drought permits or orders is not sufficient to conclude no likely significant effect (LSE). NRW have raised this concern in relation to the following six drought options in respect of the in-situ or interconnected SAC:

- 8001-2: drought order to allow 12 Ml/d abstraction from Llyn Cwellyn when the licence allows 10 Ml/d.
- 8001-7: drought order to allow Llyn Cwellyn abstraction below the licensed intake level.
- 8033-34-2: drought permit to reduce the compensation release from Llyn Bodlyn by 20%.
- 8121-3: drought permit to reduce the compensation release from Shon Sheffrey by 20%.
- 8121-4: drought permit to make releases of up to 5 Ml/d from Grwyne Reservoir for re-abstraction at Prioress Mill or Llantrisant.
- 8201-2: drought permit to reduce compensation release from Ystradfellte Reservoir by 20%.

In addition, for the drought order 8206-1(reduce the river flow required downstream of the Crowhill abstraction by 20%), NRW consider that the evidence provided in the HRA is insufficient to rule out adverse effects on the site integrity of the downstream SACs (Afonydd Cleddau/ Cleddau Rivers SAC, and Pembrokeshire Marine/ Sir Benfro Forol SAC).

Finally, NRW agreed with Dŵr Cymru's conclusion that for three drought orders, namely 8121-1 (Llwyn Onn), 8121-2 (Pontsticill) and 8201-1 (Crai Reservoir), adverse effects on the integrity of European sites cannot be ruled out (after inclusion of mitigation measures), but NRW have raised concerns with aspects of the assessment, and that the further stages 3 and 4 of the HRA have not yet been undertaken.

NRW has advised that the final drought plan must set out how DCWW will reassess aspects of the HRA where insufficient evidence has been provided to conclude no likely significant effect or no adverse effect. Furthermore, NRW have indicated that where adverse effects cannot be ruled out on the site integrity, the drought permits or orders cannot be approved or enacted unless they pass the three legal tests set out in Regulations 64 and 68 of the Habitats Regulations. Any options that are currently named as drought permits that remain in the drought plan in this context will be renamed as drought orders.

We therefore have three options:

1. Remove options from the plan
2. Amend the options so that we can demonstrate no adverse effect
3. Follow the process set out in Article 6.4 of the Habitats Regulations to
    i. Ensure all financially, technically and legally feasible alternative solutions for all options where it has not been possible to rule out adverse effects on site integrity are given due consideration at plan level, including existing and new water sources;

ii. Provide an IROPI case for all options where it has not been possible to rule out adverse effects on site integrity;

iii. Develop and agree a credible compensation plan, to be delivered during the lifetime of the plan, for all options where it has not been possible to rule out adverse effects on site integrity

In submitting the final drought plan to Welsh Government for approval to publish, Dŵr Cymru commit to not apply for the drought orders for which no adverse effect has not been agreed, including, where necessary, compensatory measure or measures have been agreed with NRW, and implementation of them has commenced.

Proposed work plan for agreement with NRW

A workplan comprising five workstreams is proposed, as the approach to addressing the feedback on the draft plan. This is set out in the table below. The Workstream would commence together and progress in parallel.

Workstream 5 deals with the 'three legal tests' to be applied, to determine if the proposals qualify for Habitats Regulations derogations. The 3 legal tests must be applied in the following order:

1. There are no feasible alternative solutions that would be less damaging or avoid damage to the site.
2. The proposal needs to be carried out for imperative reasons of overriding public interest (IROPI).
3. The necessary compensatory measures can be secured.

Once works are complete, we will consider whether each supply side measure should be removed from the Plan or will remain.

Work programme for resolution of feedback post-SoR submission			
Workstream	**Dealing with**	**Timescale (months)**	**Main steps**
1	Relatively easy EAR and EMP items	1 - 2	(i) Ricardo to provide proposed response
			(ii) Iteration, in dialogue with NRW as needed
			(iii) Agreement of change to EAR / EMP
2	More technical EAR and EMP items	1 - 6	(i) Ricardo to provide proposed response
			(ii) Possible (say 2 no.) iterations, in dialogue with NRW
			(iii) Agreement of change to EAR / EMP
3	Current HRA conclusion evidence insufficient	1 - 6	(i) Ricardo to provide further explanations / justifications for current conclusion
			(ii) Iteration, in dialogue with NRW as needed
			(iii) Possible agreement of current conclusions
			(iv) Some options pass to Stage 2 assessment
			(v) Possible agreement of Stage 2 conclusion with NRW
			(v) Some options pass to workstream 5
4	New version of option defined	1 - 9	(i) Dŵr Cymru to define new versions of an option
			(ii) Ricardo to undertake and report environmental assessment
			(iii) NRW review revised assessment
			(iv) Possible iteration, in dialogue with NRW
			(v) Agreement with NRW, or option passes to workstream 5
5	HRA Stage 3 & 4 requirements	24	(i) Ricardo review Stage 2 assessments & mitigation opportunities
			(ii) Dŵr Cymru review 'alternative solutions'
			(iii) Develop and agree IROPI cases
			(iv) Optioneering of 'compensatory measures'
			(v) Agree compensatory measures and implementation plan
			(vi) Commence implementation plan