



Draft Drought Management Plan 2015-2040

A Dŵr Cymru Welsh Water consultation

1 Introduction

- 1.1 The Consumer Council for Water (CCWater) is the statutory body representing the interests of domestic and business water and sewerage customers across England and Wales. We have a committee for Wales and four local committees in England.
- 1.2 We welcome the opportunity to comment on Dŵr Cymru Welsh Water's (DCWW's) draft Drought Management Plan 2015-2040. The consultation does not include specific questions. As the statutory body representing water consumers we have focussed on the issues of public communications. We hope this will minimise any duplication on the feedback received from the statutory regulators.
- 1.3 We submitted a written response to DCWW's pre-consultation exercise in 2013 and we are pleased to see that, in its draft plan, the company has responded to many of our suggestions.
- 1.4 We are pleased that DCWW's draft drought plan:
 - Includes a non-technical summary that covers how the company will communicate with customers in the event of drought
 - Explains its new powers on temporary water restrictions (temporary use bans)
 - Outlines actions it will take in relation to specific drought triggers
 - Specifies water efficiency and drought awareness activity it will undertake in relation to specific drought conditions
 - Includes a management and communications strategy that covers aspects of customer communications during drought.
- 1.5 We think that there is still work to do to address the following in the final plan:
 - A non-technical summary to cover exemptions to temporary water restrictions, the phasing and enforcement of temporary water restrictions and the only appeal process available to the public (judicial review)
 - Examples notices the company would use to implement and revoke restrictions
 - Better consideration of communications to vulnerable customers during drought, particularly in relation to temporary water restrictions
 - Adopting a joined up and collaborative approach as a principle in the company's water efficiency and drought communications and messages communications
 - Demonstrating how CCWater will be engaged proactively at the various stages of planning and reviewing drought action and communications.
 - Demonstrating how existing evidence of customer views has been considered in planning and drafting a customer communications plan.
- 1.6 In [our response to the Welsh Government Water Strategy for Wales consultation](#) we have supported the alignment of water resources and drought management planning processes, provided that customer engagement and priorities remain central.

2 CCWater's response to Dŵr Cymru Welsh Water Drought Management Plan

Draft Drought Plan 2012 and Non-technical Summary

2.1 We are pleased the plan covers:

- The intended customer communication around promotion of water efficiency and drought awareness messages
- The new company powers for temporary bans on water use as introduced by the Floods and Water Management Act 2010, including what changes have been as a consequence, made and how powers will be used by the company
- A clear definition of the function, sequence and timing of key drought management measures, i.e. a hosepipe ban, a drought permit and a drought order.

2.2 We are also pleased to see that the non-technical summary of the company's Drought Plan sets out action the company will take in drought conditions, which action could impact on consumers and how, and what methods the company will use to communicate with its consumers during this process.

2.3 The non-technical summary and the Drought Plan consultation should also cover:

- Information on exemptions on temporary bans
- Reference to the company's enforcement strategy in cases where non-compliance with the temporary ban is identified and the customers' only right of appeal in the process (Human Rights Act).

Information on Temporary Restrictions and drought orders

2.4 The company has included a description of the function, sequence and timing of all measures it could adopt during a drought, e.g. a temporary use ban, non essential usage bans, drought permits and drought order (in the non-technical summary and the main plan).

2.5 We are pleased that the company has outlined its new powers for temporary bans on water use (introduced by the Floods and Water Management Act 2010) in the company's procedures. It has highlighted the changes from the previous approach of hosepipe bans in both the summary and the main body of the plan.

2.6 The company commits adopting UKWIR's Code of Practice on the implementation of water use restrictions. We support this and in particular:

- prior consultation with customer before the introduction of such restrictions and
- the phasing of potential restrictions to avoid confusing and impact customers.

2.7 We would like to see more clarity on how the company has considered an enforcement strategy in cases of non-compliance with a temporary ban. This should be considered to provide customers with a further incentive to comply with restrictions and to help save water.

2.8 We understand there is no formal process for objecting to restrictions imposed under a temporary ban, unless a customer requests a judicial review under the Human Rights

Act. The company should provide this information in the final plan so that customers are aware of the only available system for appeal and to minimise any unwanted company contacts.

- 2.9 We suggest that the company provides examples of notices for the introduction and revocation of a temporary ban. We would ask that you consult with CCWater before the publication of such notices, and that this specified in your communications plan as an essential step.

Communications with vulnerable customers

- 2.10 We suggest more thought is put into communications with vulnerable customers in the final plan. Although the list of exemptions outlined in the plan includes blue badge holders on the grounds of disability and customers listed in the company's additional services database, the company should do more to explain how it would target all vulnerable customers. The plan should demonstrate how specific activity that target vulnerable groups, particularly in relation to water restriction exemptions, would be undertaken and how effective methods have been considered.

Water Efficiency messages

- 2.11 We are pleased to see the inclusion of a section on water efficiency in the plan. It has considered how action on water efficiency can be tailored to the severity of the drought conditions and what resource savings different water efficiency actions and devices can deliver. However, we think that a joint approach to water efficiency communications involving other parties should be the stated as the company's approach. We particularly would like to see how the company would work with CCWater. The plan should also acknowledge how the company could use the new Welsh Government Portal, Resources Efficient Wales.

Joint communications and communication strategy

- 2.12 We are pleased to see a management and communications strategy in section 5 of the plan. It demonstrates the company is thinking about how communications will be delivered during a period of drought. It also considers an appropriate lead-in time for any communication actions directly linked to demand and supply-side drought management actions.
- 2.13 A joint communications approach should underline the company's activity as this could help avoid duplication of effort and disparate messages. Joined up communication activity has been a successful practice in Wales before¹ and we would expect to understand how the company is planning to coordinate communications with Natural Resources Wales, the Welsh Government, CCWater (media and local team) as well as other companies (and stakeholders) that might be affected in case of drought.
- 2.14 We think the company's communication plan should specifically recognise the role of CCWater in the preparation of communications and we would like to see how the

¹ 2007 Wales Water Resources Communications Sub-Group consisting of Countryside Council for Ware, CCWater , Welsh Government and Environment Wales as well as the water companies.

company is planning to consult us upfront. The relevant parts and tables in your plan should name CCWater as a key contact at various stages.

- 2.15 The specific neighbouring water companies that Dŵr Cymru Welsh Water would have to contact should also be mentioned in all relevant tables and sections of the plan. This will ensure that if the drought plan is used as a guide none of these companies will be left out.
- 2.16 Whilst the company demonstrates how communication actions will be taken in response to crossing drought triggers it should more explicitly consider different customer audiences, e.g. non-household customers and vulnerable groups, and what specific actions and messages should apply to these audiences.
- 2.17 The plan also demonstrates how the company has considered how drought action delivery would affect its management structure-a system is in place to deliver the identified actions.
- 2.18 Finally, we can see the company commits to monitoring and evaluating the effectiveness of communication activities during a drought. We would like to ensure this is based on feedback from representatives of customer groups, CCWater, as well as other measures such as website hits, requests from customers for information on water efficiency or water saving devices and the change in demand for water.

Customer evidence on perceptions of drought and communications

- 2.19 We are pleased to see the plan identifies additional leakage detection and repair activities as a management step in some drought scenarios. CCWater research evidences that customers' perception that companies are not doing enough on leakage could act as a barrier to water efficiency action should be acknowledged in the final plan and as it supports the company's (economic level) leakage detection approach².
- 2.20 We also suggest the company considers CCWater's research on domestic and business customers' attitude to temporary use bans³, including the impact and consequences of planned for restrictions and customers' acceptance or tolerance of these interventions, perceptions of the industry's handling of drought situations, and the language and channels used to communicate with consumers. The final plan should demonstrate how the company has considered this research in planning communications with customers.

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² CCWater research on customers' Water saving, August 2013, <http://www.cewater.org.uk/wp-content/uploads/2013/12/Research-into-customer-water-saving.pdf>;

³ CCWater research on Water restrictions, May 2013, <http://www.cewater.org.uk/wp-content/uploads/2013/12/Consumer-Council-for-Water-Understanding-drought-and-resilience.pdf>;