



Draft Drought Management Plan 2015-2040

A Dee Valley Water consultation

1 Introduction and summary of CCWater response

- 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 Dee Valley Water's draft Drought Management Plan 2015-2040. The consultation does not include any specific questions. As the statutory body representing water consumers we have focussed on the issues of public communications and consultation. We hope this will minimise any duplication on the feedback received from the statutory regulators.
- 1.3 We submitted a written response to Dee Valley Water's (DVW) pre-consultation exercise in 2013. The draft drought plan did not acknowledge CCWater as a key stakeholder that participated in this exercise and our written pre-consultation response. This is an oversight and could be indicative of a lack of understanding of CCWater's significant role as a water consumer representative in important customer services and communications issues. We have therefore sought and received assurance that the company has considered all our previous recommendations, some of which are repeated in our response to the draft drought plan.
- 1.4 We are pleased to see that the company:
 - 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
 - includes a management and communications strategy that covers important aspects of 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 that goes further than summarising drought triggers and actions to outline the company's communications strategy and exemptions to temporary water restrictions amongst other things
 - More clarity on the phasing and enforcement of temporary water restrictions as well as clarity on judicial review appeal process available to the public
 - Better consideration of communications to vulnerable customers during drought, particularly in relation to temporary water restrictions
 - Tailoring specific water efficient and drought awareness action to different drought conditions
 - Adopting a joined up and collaborative approach as a principle in the companies drought communications strategy
 - Improving the communications strategy to demonstrate communication has been adapted to address the needs of different customer groups and that all companies and key stakeholders are identified at the right stages
 - Demonstrating how existing evidence of customer views has been considered in planning and drafting a customer communications plan
 - Demonstrating how CCWater will be engaged proactively at the various stages of planning and reviewing drought action and communications.
- 1.6 In [our response to the 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 Dee Valley Water's Drought Management Plan

Draft Drought Plan 2012 Non-technical Summary

- 2.1 A non-technical summary of the company's Drought Plan should present a summary of the full drought plan- at the moment it just focusses on what would trigger drought action. It could also be presented in a way that would encourage public and stakeholder engagement in the drought planning process, other than that of the expert stakeholders. More specifically, we think the summary should be amended to explain :
- the company's communication and engagement strategy, an essential part of the drought planning process that the company should have sought views on
 - the 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.
- 2.2 We would also suggest the summary covers the following succinctly:
- Intended customer communication on water efficiency and drought awareness messages
 - The new powers for temporary bans on water use as introduced by the Floods and Water Management Act 2010 and how they will be used
 - 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 rights of appeal in the process
 - A clear and concise definition of the function, sequence and timing of key drought management measures, i.e. a hosepipe ban, a drought permit and a drought order.

Information on temporary restrictions and drought orders

- 2.4 The main plan includes definitions of the function, sequence and timing of a hosepipe ban, drought permit and drought order in the plan's Glossary of Terms. We think it is important to include an overview and definitions of the management actions at the beginning of the drought management action section of the plan (section 3). This would help signpost the reader to the range of actions available to the company.
- 2.5 We are pleased the company has explained its new powers for temporary bans on water use in the company's procedures (as introduced by the Floods and Water Management Act 2010). It has highlighted the changes from the previous approach for hosepipe bans in section 3 of the plan and it commits to adopting UKWIR's Code of Practice on the implementation of water use restrictions.
- 2.6 The company has considered phasing different types of restrictions to avoid confusing and impacting customers. However, we ask for more clarity on the uses that the company would expect to prioritise when phasing restrictions (particularly in relation to its different triggers).
- 2.7 More clarity on how Dee Valley Water has considered an enforcement strategy in cases of non-compliance with the temporary ban is identified should also be included in the plan. This would explain how the company would create a further incentive for customers to comply with the restrictions imposed and help save water.

- 2.8 We understand that 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 are pleased that the company has provided two examples of notices for the introduction of a temporary ban and the revocation of the ban. We would ask that you consult with CCWater before the publications of such notices, and that this specified in your drought communications plan as an essential step.
- 2.10 Finally, we suggest that the company considers presenting information on exemptions in a tabular form to outline more clearly how it has considered the groups of people who could be affected adversely by these restrictions, particularly vulnerable customers, those who have invested in low water use technologies, or any concessions linked to phasing restrictions. The plan could specify that this information will be placed on the company's website during times of drought to make the information accessible to more customers affected by temporary restrictions.

Consideration of vulnerable customers

- 2.11 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 (vulnerable customers) database it does not explain how the company would target other vulnerable customers, such as for example WaterSure customers who require high use of water. At the moment we are not aware that WaterSure customers are automatically added to the company's additional services/vulnerable customers' database. This would be one way to help overcome the problem of targeting those customers most in need during drought communication planning.
- 2.12 Consideration of communications with vulnerable customers at times of drought, particularly in relation to water restriction exemptions, should be strengthened in the final plan. More specifically, section 6 (table five) which outlines communication actions in response to crossing drought triggers as well as subsequent actions, should specifically consider vulnerable groups and specific activity that should apply to those.

Water Efficiency messages

- 2.13 We are pleased to see that the company has included a section on water efficiency in its plan (section 3). The plan should acknowledge how the company could use the new Welsh Government Portal, Resources Efficient Wales, and how it would work with CCWater to promote water efficiency messages.
- 2.14 However, the list of water efficiency actions presented in the plan seems all-encompassing and not specific enough to drought triggers. We would like to see some specific examples on the action the company is more likely to take in relation to specific drought conditions. The company should also include an example of a notice in the appendices of its plan outlining the key messages it would like to communicate to customers on water efficiency in the even of drought.

A collaborative joint communications approach

- 2.15 Joined up communication activity has been a successful practice in Wales before¹. Therefore a collaborative communications should be stated as the preferred approach at the outset of the company's communication strategy (section 6). We think the plan could explain better how the company intends to coordinate communications with Natural Resources Wales, the Welsh Government, CCWater (media and local team) as well as other companies that might be affected in case of drought. Other stakeholders as well as the new WG advisory portal, Resources Efficient Wales should be acknowledged in the plan.

Drought Communication strategy

- 2.16 We are pleased to see a management and communications strategy in section 6 of the plan. It demonstrates the company is thinking about how communications will be delivered during a period of drought but we would suggest that this section is reviewed to strengthen some of its parts.
- 2.17 The plan should consider an appropriate lead-in time for any communication actions directly linked to demand and supply-side drought management action. This is particularly important for the consultation, advertising and any subsequent implementation of temporary use restrictions and drought permits and orders.
- 2.18 The company should consult with the CCWater upfront when deciding on communications. We should also be identified as a key organisation to involve in reviewing and preparing drought communications, at various stages. For example, table three should name CCWater as a key contact for the company's communications coordinator, not just a stakeholder and table four could also be revised to elevate the importance of communication with us.
- 2.19 The specific neighbouring water companies that DVW might have to contact should be mentioned at all relevant tables, including table 3. This will ensure that if the drought plan is used as a guide none of these companies will be left out.
- 2.20 The Strategy needs to be strengthened to demonstrate how the company considered different customer audiences, including any vulnerable groups and low consumption technology users, including messages adapted for these audiences. For example DVW could review Table 5 which outlines when communication actions will be taken in response to crossing drought triggers as well as subsequent actions a company will take to make it relevant to specific groups.
- 2.21 Finally, we would like to see how the company will monitor and evaluate the effectiveness of drought communication activities during a drought. This could be based on feedback from representatives of customer groups, including CCWater, and other

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.

institutional organisations, 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

- 2.22 We are pleased to see that DVW's 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.
- 2.23 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.

CCWater Response enquiries:

Lia Moutselou
Policy Manager
Consumer Council for Water Wales Committee
1-6 St Andrew's Place

Mobile: 07554 405 859
Office: 02920 379856
Email: lia.moutselou@ccwater.org.uk

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>;