



# 2015 Drought Plan

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## Executive Summary

July 2015





# **EXECUTIVE SUMMARY**

## **Introduction**

Dee Valley Water (DVW) is a water supply only company, providing 64 million litres of water per day to a population of over a quarter of a million in the area of north east Wales and Chester. Our customers comprise 112,000 households and 8,000 business customers. We are the smallest of the water companies existing since the privatisation of the water industry in England and Wales in 1989.

Our objective is to maintain a consistent supply of wholesome water that gives customers good value for money, during both normal operation and during a drought situation. Not only is this our statutory obligation, but it is what our research has shown customers expect.

As a water company, we are required by law to produce a Drought Plan. Part of the Drought Plan includes consulting with our customers and other main stakeholders on how we propose to manage the service we provide during a drought situation.

Towards the latter part of 2013 we carried out a pre-consultation process with our main stakeholders to ask them for their views on our previous plan so that we could use these to shape and improve our new Drought Plan. Following the pre-consultation we produced a draft Drought Plan incorporating the representations we received.

In September 2014 the draft Drought Plan was published on our website for further consultation. This time the consultation process was much wider, we sent out a series of emails and letters asking 119 customers and other stakeholders to review our plan and respond with representations. A complete list of the stakeholders that we engaged with is given in Appendix A – List of consultees.

In light of the responses we received to the consultation, we made some changes and reissued our draft Drought Plan, we also published a list of the representations that we received along with our response. The changes we made were to provide further clarity and detail to the Plan, none of them were material to its function. The Welsh Government have now given their consent for us to publish our final Drought Plan along with supporting documents.

The sections below provide an overview of how we intend to manage our supplies of water during a drought and how we will communicate this process with our customers and other stakeholders.

## Changes since the last Drought Plan

A number of improvements have been made to this Drought Plan to reflect legislative and regulatory changes that have occurred since the previous plan, and to comply with the latest guidelines and codes of practice. These changes include:

- Under the Flood and Water Management Act 2010, the Water Industry Act 1991 has been amended to grant water companies wider and more far reaching powers to restrict water use when required through Temporary Use Bans. Temporary Use Bans replace what were known as '*hosepipe bans*' allowing water companies to impose temporary use restrictions without the requirement of a Drought Order. Within our Plan we explain how we intend to use these powers in a drought situation and how this will impact our customers. We have also provided further clarity on how Temporary Use Bans differ from '*hosepipe bans*'.
- The improvement of our proposed communication plan. This details how we will communicate with our customers and other stakeholders during a drought situation.
- Inclusion of a Strategic Environmental Impact Assessment Screening Report and a Habitats Regulations Assessment Screening Report to identify any potential adverse effects that the drought options we have considered may have on the environment.

We have also expanded this Executive Summary to make our plan more accessible to a wider audience.

## Drought triggers

Drought triggers indicate when a drought situation is developing and are used as decision making stages to assist in drought management. The drought triggers for DVW are dictated by the availability of water within the Dee Storage System as the River Dee is our main source of water. In turn, this means that most of our drought management actions are dictated by the Dee General Directions which govern the Dee Storage System.

The River Dee provides 87% of the water we require, the remainder being supplied from upland reservoirs and groundwater sources. The River Dee is regulated by Natural Resources Wales using reservoirs in the Welsh hills, according to the Dee General Directions<sup>1</sup>. For severe droughts, the General Directions define the drought triggers and the actions that we are required to take in response to these triggers. The triggers are associated with the amount of water available in the Dee Storage System. As stocks decrease, trigger points are crossed which prompt drought management actions to be taken.

We do not have any drought triggers associated with our upland and ground water sources as they provide only a small contribution to the overall supply. As such, we do

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<sup>1</sup> The Directions are subject to the approval of the Dee Consultative Committee which comprises Natural Resources Wales, Environment Agency, United Utilities, Dŵr Cymru, Dee Valley Water and British Waterways.

not foresee a scenario whereby we would need to carry out drought management actions due to a lack of water in these sources.

The drought triggers and the actions which correspond to these triggers are shown in the table at the end of this section.

## **Drought management actions**

Drought management actions comprise demand side actions and supply side actions, the implementation of which are determined by the triggers discussed above. Demand side actions focus on reducing demand for water from our operations or from our customers; whilst supply side actions are those that increase the availability of water.

For demand side actions, we will communicate with our customers at an early stage of a developing drought, carrying out additional water efficiency promotion and encouraging the efficient use of water.

We recognise that if we expect our customers to reduce the amount of water they consume then we should also go to similar efforts to reduce our level of leakage. We will do this by carrying out additional leakage detection and repair activities.

As the drought becomes more severe, we may have to introduce Temporary Use Bans and ultimately apply for Drought Orders in extreme situations.

Temporary Use Bans primarily restrict the use of water by domestic customers through banning hosepipes and sprinklers and are one of the most effective and significant demand side measures available. Before implementing a Temporary Use Ban we will publish information advertising the proposed actions in at least two newspapers circulating in the local area and on our website. These notices will be part of a larger communications strategy.

The activities prohibited under a Temporary Use Bans are listed in Section 36 of the Flood and Water Management Act 2010. These activities are:

- Watering a garden using a hosepipe
- Cleaning a private motor-vehicle using a hosepipe
- Watering plants on domestic or other non-commercial premises using a hosepipe
- Cleaning a private leisure boat using a hosepipe
- Filling or maintaining a domestic swimming or paddling pool
- Drawing water, using a hosepipe, for domestic recreational use
- Filling or maintaining a domestic pond using a hosepipe
- Filling or maintaining an ornamental fountain
- Cleaning walls, or windows, of domestic premises using a hosepipe
- Cleaning paths or patios using a hosepipe
- Cleaning other artificial outdoor surfaces using a hosepipe

To avoid any confusion to our customers, the above eleven activities will be implemented in a single phase.

Exceptions to Temporary Use Bans will be made according to the code of practice<sup>2</sup> and fall under three categories. These are:

- Statutory Exceptions – Specified through legislation and are on the grounds of health and safety, the environment or where businesses may be effected.
- Discretionary Universal Exceptions – Common to all water companies and primarily relate to Blue Badge holders.
- Discretionary Concessional Exceptions – Granted by individual water companies following the receipt of a representation. All exceptions are subject to our discretion and will only be granted if it is in the best interest of the community. We will consider granting an exception to customers on the company's Vulnerable Customers List, Water Sure List and to those whom have mobility issues but are not in possession of a Blue Badge. These exceptions will require customers to write or make representation to Dee Valley Water to obtain permission. A form to request and exception has been provided in Appendix H – Temporary Water Use Exception Form. More details on how to make a representation are given in section 3.3.5.

There is no formal process for objecting to restrictions under a Temporary Use Ban, we will only introduce these measures in very extreme circumstances when it is in the best interest of both customers and the environment. Objections can be lodged as a judicial review under the Human Rights Act.

A Drought Order is one of the most extreme demand side action available to us. The aim of a Drought Order is to extend existing restrictions under the Temporary Use Ban to non-domestic customers. To implement a Drought Order, we must first apply to the Secretary of State and the Welsh Government which can be a lengthy process.

With regard to supply side actions, we only have one available to us, this is the support of the River Dee with water from our Pen-y-Cae Reservoir. The volumes which we will transfer into the River Dee are determined by the Dee General Directions and are dependent on the trigger that has been crossed.

## **Enforcement of a Temporary Use Ban or drought order**

The Water Industry Act 1991 and Water Resources Act 1991 states that anyone found guilty of breaching a Temporary Use Ban can be fined up to Level 3 (an amount of £1000 under the standard scale of fines for summary offences in the Criminal Justice Act 1982 section 32). Offenders breaching a Drought Order restriction are liable to a fine not exceeding the statutory maximum (which is an amount of up to £5000). Conviction on indictment renders an offender liable to a fine with no specified upper limit.<sup>3</sup>

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<sup>2</sup> United Kingdom Water Industry Research (UKWIR) 'Code of Practice and General Guidance on Water Use Restrictions

<sup>3</sup> Taken from the UKWIR document 'Code of Practice and General Guidance on Water Use Restrictions

## **Communications strategy**

An essential part of the Drought Plan is the communications strategy that we intend to follow in the event of a drought. Effective communications can help to reduce customer demand, increase the available water for supply, reduce the impact on the environment and avoid confusion especially with respect to which activities are subject to water use restrictions.

In the event of a drought situation developing, we have a management structure that we will put place to ensure effective implementation of the drought plan including the communications strategy. A key member of the management structure is the communications coordinator who will be responsible for ensuring that communications are carried out at the appropriate time using the appropriate methods and with the relevant stakeholders.

For domestic and commercial customers, the majority of our communications will be through press, radio and television adverts, our customer call centre, bulletins on our website, promotional events, text messaging, leaflets and posters. We have an additional channel of communication with our larger commercial customers via their accounts managers. Customers identified as vulnerable or Water Sure in our billing database will also be provided with an information pack. Prior to making any communications with our domestic and commercial customers, we will liaise with the Consumer Council for Water who is the independent customer representative.

Other stakeholders such as regulators, environmental groups and local representatives will be contacted using letters, emails or telephone conversations.

The table on the next page summarises the main communication messages that we will deploy in the event of a drought situation and how these correspond to the drought triggers and actions.

## **Post drought actions**

Temporary Use Bans will be lifted when the water resources have returned to their normal status. To determine this point, consideration will be taken of the actual level of the resources and the prevailing and projected weather conditions.

Similar to implementation, the revocation of the restrictions will be published on our website and in two local papers as per the legislation. We will then carry out a post drought review to determine the effectiveness of the Drought Plan, document the lessons learnt and identify improvements for the future.

Status	Trigger	Operational Action	Communication
Normal	Dee Storage System in Zone 1	Abstraction is only constrained by licence conditions / Lift restrictions if entering zone as part of drought recovery.	<p><b>Key message: Use water wisely</b></p> <p>Normal water efficiency promotion and leakage management activity.</p> <p>Water efficiency promotion includes: fitting of cistern displacement devices, reducing the time spent in the shower, turning the tap off whilst cleaning teeth etc.</p>
	Trigger 1 – Dee Storage System crossing the System Safe Yield Line	Maximum abstraction must not exceed Safe Yield Allocation.	
Developing Drought	Trigger 2 - Dee Storage System crossing the System Conservation Rule Curve	Dee Consultative Committee must convene within 7 days to discuss the implementation of Stage 1 Drought General Directions.	
Drought	Trigger 3 - Dee Storage System crossing Stage 1 Implementation Curve	<p>Net reduction in abstraction of 0.4Ml/d through the augmentation of the River Dee with water from Pen-y-Cae Reservoir.</p> <p>Dee Consultative Committee convenes within 7 days to discuss the implementation of Stage 2 Drought General Directions.</p> <p>Increased leakage management activities.</p>	<p><b>Key message: Don't waste water</b></p> <p>Increased water efficiency promotion to customers using website and advertisements.</p> <p>Increase awareness of internal staff.</p> <p>Contact CCWater, WaterWise and WaterUK to ensure a joined up strategy is in place.</p> <p>Contact other stakeholders to discuss the drought situation.</p>
Severe Drought	Trigger 4 - Dee Storage System crossing Stage 2 Implementation Curve	<p>Net reduction in abstraction of 0.8Ml/d through the augmentation of the River Dee with water from Pen-y-Cae Reservoir.</p> <p>Dee Consultative Committee convenes to discuss the implementation of Stage 3 Drought General Directions.</p> <p>Plan to implement Temporary Use Bans</p>	<p><b>Key message: Voluntary restrictions and Temporary Use Bans</b></p> <p>Advertise voluntary restrictions and publish intent to impose a Temporary Use Ban using website, adverts in local paper, on the radio and on TV.</p> <p>Update internal staff.</p> <p>Maintain contact with CCWater, WaterWise and WaterUK.</p> <p>Meet with regulators and other stakeholders to escalate drought message.</p>
	Trigger 5 - Dee Storage System crossing Stage 3 Implementation Curve	<p>Introduce and enforce Temporary Use Bans.</p> <p>Apply for Drought Orders.</p> <p>Implement Drought Orders.</p>	<p><b>Key message: Temporary Use Bans and Drought Orders</b></p> <p>Advertise the implementation of a Temporary Use Bans and Drought Orders using website, adverts in local paper, on the radio and on TV.</p> <p>Update internal staff.</p> <p>Maintain contact with CCWater, WaterWise and WaterUK.</p> <p>Meet with regulators and other stakeholders to escalate drought message.</p>