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Hafren Dyfrdwy Drought Plan 2020 - 2025

Executive Summary

In this Draft Drought Plan Hafren Dyfrdwy sets out its approach to managing its supplies of water to its customers during a drought event. This Draft Drought Plan has been prepared on the basis of the guidance contained in the Natural Resources Wales Water Company Drought Plan Technical Guideline issued in December 2017 and the associated guidance notes. This Plan provides a comprehensive overview of the triggers and their corresponding drought management actions that will be carried out in the event of a drought.

Executive summary

Introduction

Hafren Dyfrdwy is a water and wastewater company which provides around 58 million litres of water per day, to a population of approximately 220,000 in the area of mid and north east Wales. Our customers comprise approximately 97,000 households and 8,000 business customers. Dee Valley Water became part of the Severn Trent group in February 2017. We have launched our new name, Hafren Dyfrdwy on 1st July 2018 following Ofwat's approval to align the boundaries of Severn Trent and Dee Valley Water to the national boundaries of Wales and England.

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.

This is the final version of Hafren Dyfrdwy's statutory drought plan 2020 - 2025. It is an update to the plan we published in July 2015. We produce drought plans to explain how we will manage both supplies and demand for water during a drought in our region. Our plan aims to balance the interests of customers, the environment and the wider economy. The plan helps us and our stakeholders to make the right decisions at the right time and shows how we will provide a continuous supply of water to our customers during a drought. 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 2018 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 and other updates.

In July 2019 the draft Drought Plan was published on our website for further consultation. This time the consultation process was much wider, we sent out emails and put out press release asking customers and stakeholders to review our plan and respond with representations.

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.

Droughts are naturally occurring events and we cannot plan to prevent them from happening. Instead, we plan to minimise the impacts of droughts when they do occur. All droughts differ in severity, extent and duration. As a result, whether the effects of any particular drought are focused primarily on the environment, on public water supply or on other water users in the wider economy will depend on the individual characteristics of each drought.

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:

- Revisions to reflect the latest NRW Water Company Drought Plan Technical Guideline issued in December 2017 and the associated guidance notes.
- Revisions to reflect the geographical area supplied by HAFREN DYFRDWY and our new water resource zones.
- Updates to control curves for our upland reservoirs in the Wrexham water resource zone (WRZ), which was carried out in line with our WRMP19.
- The improvement of our proposed communication plan. This details how we will communicate with our customers and other stakeholders during a drought situation.
- Updates to our 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 the Wrexham WRZ are dictated by the availability of water within the Dee Storage System. Thus, most of our drought management actions in the Wrexham WRZ are dictated by the Dee General Directions which govern the Dee Storage System. Drought trigger levels for Llandinam and Llanwrin WRZ have been derived on a pro-rata abstraction licence basis of the combined annual licenced volume.

The River Dee provides 61% of the water we require, the remainder being supplied from upland reservoirs in the Wrexham WRZ and groundwater sources. The River Dee is regulated by Natural Resources Wales (NRW) using reservoirs in the Welsh hills, according to the Dee General Directions¹. 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 reservoirs in the Wrexham WRZ as they provide only a small contribution to the overall supply. As such, we do not foresee a scenario whereby we would need to carry out drought management actions due to a lack of water in these sources.

¹ The Directions are subject to the approval of the Dee Consultative Committee which comprises NRW, EA, United Utilities, Hafren Dyfrdwy, Severn Trent Water, Dŵr Cymru Welsh Water, Canals and Rivers Trust.

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 practice² 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.

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

- 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 Hafren Dyfrdwy to obtain permission. A form to request an exception has been provided in Appendix H – Temporary Water Use Exception Form. More details on how to make a representation are given 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 Lower 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.³

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 in place to ensure effective implementation of the drought plan including the communications strategy. A key member of the management structure is the

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

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.

Section 5.3 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.