

## Consulting on an update of the water company drought plan guideline

---

### Introduction

The Blueprint members welcome the opportunity to respond to the Environment Agency's consultation on updating water company drought plan guidelines. We are pleased to see the additional information around environmental monitoring and believe this provides clarity over the range of ongoing environmental monitoring required of water companies. However we are disappointed that there is no mention of the need for wider supply and demand management in general given predicted changes in climate and population. The main focus on planning for drought should be aimed at reducing demand and sustainable management of resources now, rather than relying on a reactive action plan when droughts occur. As such we would like to see drought plans incorporated into water company water resource management plans. This is especially salient given Ofwat's resilience duty. Long term resilience to drought, flooding and population growth must be considered by Ofwat and cannot be considered in isolation to each other. We respond to this consultation specifically around whether the guidelines will allow water companies to adequately plan for a drought and protect the environment. We do not have the expertise to comment on other aspects.

**1. Do you think the technical changes to this drought plan guideline will allow a water company to adequately plan for a drought to maintain supplies to its customers and protect the environment? If not, what changes do you think need to be made to allow a company to achieve this?**

Whilst we believe that the changes add some clarity on how water companies should plan for drought, we do not believe the plans will currently provide adequate protection for the environment. Plans need to assess demand by other water users and the overall impact of water use on the catchment in times of drought. Although the guidance does mention having preliminary discussions with other water suppliers in the catchment, there is no mention of consulting with water users such as those abstracting water for agriculture or industry. There needs to be specific mention of the need to assess cumulative impacts at a catchment scale in order to adequately protect the environment.

We believe that drought triggers need to be set at a level that ensures that environmental harm does not occur. As such the trigger level is important and although the guidelines indicate that the triggers and reasons for the triggers need to be laid out in the plans there is no guidance around how they should be set. For example if water is abstracted from a sensitive wetland such as a chalk stream or groundwater-fed fen we would want to see drought levels triggered before the water levels become ecologically damaging.

**2. Please tell us if there are any other plans and processes that you feel are relevant to drought plans that companies should consider.**

We welcome the requirement to consider local actions within river basin management plans and to consult with the Environment Agency/Natural Resources Wales regarding Water Framework Directive status and programmes of measures. It is important to speak to the catchment co-ordinators in order to fully understand what is happening at a catchment scale and to adequately understand the possible impacts of a drought plan

rather than rely on the river basin management plans. We do not believe integration with the aims of the River Basin Management Plans is a strong enough requirement; we believe that drought plans must not negatively impact on the delivery of the River Basin Management Plans /Water Framework Directive process. Inadequate planning for drought resulting in a decline in the status of a water body would constitute a breach of the Water Framework Directive and this is not made clear in the guidance.

We believe that local catchment partnerships should be engaged with the drought planning process. The expertise in catchment partnerships would help identify potential negative environmental impacts from the drought plan and possible solutions.

We believe that the guidance should include consultation with lead local flood authorities and development of local flood management plans. It is important that we start making better linkages between various water management plans both for times of scarcity and flood. For example, there are many ways we could improve our ability to retain water during periods of high rainfall that would help to reduce our need to impose drought restrictions (see question 4).

We hope to see a much closer integration of Flood Management Plans, River Basin Management Plans and water company planning over the next Water Framework Directive cycle.

It is important that we see greater alignment between drought plans and water resource management plans with possible future integration. Currently drought plans allow supply options to be put in place during periods of drought which can be more environmentally damaging than those allowed in the water resource management plans. Better integration between the two plans would help water companies to investigate and plan for (mitigate etc) these options thereby reducing their overall impact on the environment instead of simply utilising them during drought situations. Currently those companies wishing to progress towards more integrated planning are disadvantaged. They need to secure licences for the supply options they would use in drought circumstances whereas their competitors simply apply for drought orders as and when needed with little regard for environmental protection.

**3. Do you think the guidance strikes the right balance between planning for events more severe than those on the historical record and planning for droughts that you might reasonably expect to experience?**

We believe that in light of climate change predictions, the historical record does not provide an adequate indication of the frequency, duration or timing of drought events that might reasonably be expected to be experienced in the future. Use of stochastic modelling to identify potential future drought events is valuable in considering both supply resilience and environmental resilience, and the experiences of companies already utilising this technique, such as Southern Water, should be shared within the industry. However, the (somewhat artificial) planning distinction between water resources and drought supply options presents a barrier in effective planning to secure supplies and prevent environmental damage.

**4. Please tell us if there are any other supply or demand management actions that water companies should consider.**

Stronger guidance and investment criteria should be made available to allow water companies to better integrate longer term supply and demand management so that water levels are less likely to trigger drought measures. This will require a step change within the industry towards a permanent drought planning footing and customers will need to be taken on the journey to better understand the acute water availability constraints large sections of the south and east operate under. By managing our water better in times of flood e.g. by slowing it down and allowing for more natural water storage we can reduce the rate at which drought measures may need to be implemented. Restoring upland habitats to hold more water and release it slowly maintains the water table at a serviceable level for longer. Reducing domestic and business demand for water is a critical part of long term planning to reduce the impact of drought.

**5. Do you think that the information required for drought orders and permits is appropriate? If not what changes do you think are needed?**

No comment

**6. Do you think the guidance on environmental impacts will allow for sufficient protection of the environment during a drought?**

No, we do not believe this guidance on environmental assessment will allow for sufficient protection of the environment during a drought. As a minimum the following points still need to be taken into account within the guidance:

- We are concerned that there is no mention of the need to assess and minimise impact on SSSI status.
- There is also no mention of potential impacts on protected habitats or species outside of European protected areas or RAMSAR sites.
- The environmental guidance is very site specific around water supply areas whereas we believe it is important to take a wider catchment approach to the actions proposed.
- As water levels drop nitrate and phosphate concentrations increase. Water supply options triggered by a drought may result in reduced water levels in associated water bodies. Although the water levels themselves may not be at a level damaging to the environment, it is important that in these situations levels of nitrate and phosphate do not reach damaging levels. We believe this risk should be specifically accounted for within the guidance on environmental assessment.

**7. Do you think the guidance on environmental monitoring before, during and after a drought will allow water companies to assess the impact of their drought actions on the environment? If not how could it be**

We welcome the additional guidance on environmental monitoring and are pleased to see the inclusion of baseline monitoring as soon as practical rather than waiting until a drought event.

We are concerned that for areas which are currently over abstracted initiating baseline data records from a current point in time does not give adequate information about what the environmental data should look like. As such we would like to see historic data used to inform this baseline where it is available. However, if the baseline information is not

already available then we understand options are limited. We would however, like to see a caveat that existing over abstraction needs to be accounted for when assessing baseline data. In addition the baseline guidance does not specify what parameters need baseline monitoring instead stating that it should be proportional to the risk. However, a full understanding of the risk cannot be determined without a full range of baseline monitoring.

**8. Do you think the guidance on communications planning will allow water companies to keep their customers informed during a drought? Please tell us if there is any additional information water companies should consider?**

Research by Dessai & Sims (2010) indicates that there is a lack of awareness among the public of the quantity of water used by households and businesses, including agriculture and the cost of providing it. This needs to be integrated not only into drought communication but also into raising awareness around demand management more generally. This research also indicated that experiencing drought and water restrictions elevated people's perception of the seriousness of the water situation and instigated behavioural change to conserve water during the drought<sup>1</sup>. Research commissioned by the Consumer Council for Water indicates that there is value in communicating pre-drought shortages to shift the perception that drought is only an issue when restrictions are in place. Customers can be surprised to learn that an area can be in drought without restrictions<sup>2</sup>. As such we believe that communications planning should include pre and post drought communication laying out plans to try and maintain behaviour change and the understanding of water as a valuable resource.

There is a lack of accessible information on the environmental demand for water. People need to understand the impacts of water demand on the environment, particularly in times of drought. It is believed that the general public are more likely to change their water requirements and support efforts to better manage it if they fully understand the implications on the environment.

It is also important that water companies make it clear what they are doing to manage the drought. This can help people feel more inclined to take steps themselves to reduce water demand. The research commissioned by the Consumer Council for Water suggests that communication should include:

- What restrictions are in place
- How serious the drought is
- What the water company is doing to resolve the immediate issues

However, there is a need to maintain communication outside of a drought period around long-term resources on saving water to aid behavioural changes. Information on what they

---

<sup>1</sup>Dessai, S. & Sims, C. (2010) Public perception of drought and climate change in southeast England, *Environmental Hazards*; 9: 340–357

<http://tyndall.ac.uk/sites/default/files/DessaiSims.pdf>

<sup>2</sup>You Gov (2013) Understanding drought and resilience, Consumer Council for Water

<http://www.ccwater.org.uk/wp-content/uploads/2013/12/Understanding-Drought-and-Resilience.pdf>

are doing to reduce the impact of drought and leaks in order to enhance trust among customers through showing transparency in making customers understand the range of services they pay for and establishing a two-way relationship with the customer<sup>2</sup>.

Waterwise research concludes that more work needs to be done on an on-going basis to communicate with customers about water services in general and water conservation in particular in order for communication during times of drought to be more effective<sup>3</sup>.

**9. Please tell us if you have any other views or comments on these proposed changes that have not been covered by previous questions.**

We believe that there needs to be more emphasis on long term demand and supply management. Although we understand that this is more part of the Water Resources Management Plans we believe it has a valid place within this guidance document as the need for reactive drought management measures can be reduced by better long-term planning. Considering long term demand and supply management within the drought plans would aid in moves towards achieving future integration of the two types of plan.

In the longer term, we would support the combination, or at least the better integration, of drought plans and water resources management plans in order to facilitate a coherent approach to the management of water for public water supply. We believe that, in particular, water supply options that are called upon during times of drought could negate the environmental protection provided by the more rigorous approaches employed when including options in company water resource management plans. With OFWAT's new resilience duty coming into effect it would follow that such an integrated approach, which allowed companies to include options for times of drought as a component of deployable output and to plan for their implementation accordingly (including by obtaining abstraction licences, removing the uncertainty often accompanying drought permit applications), would meet this duty by providing both better protection to the environment, and better security of supply for water companies and their customers.

**Blueprint for Water coalition**

The Blueprint for Water is a unique coalition of environmental, water efficiency and fisheries and angling organisations that is calling on the Government and its agencies to set out the necessary steps to achieve "sustainable water" by 2015. The Blueprint for Water is a campaign of Wildlife and Countryside Link. More information is available at

[www.blueprintforwater.org.uk](http://www.blueprintforwater.org.uk)

**This consultation is supported by the following 13 organisations:**

- Angling Trust
- Amphibian and Reptile Conservation
- Buglife
- Friends of the Earth England
- Institute of Fisheries Management
- The Wildlife Trusts

---

<sup>3</sup> Waterwise (2013) Water Efficiency and Drought Communications Report  
[http://www.waterwise.org.uk/data/2013\\_Waterwise\\_Drought\\_Report.pdf](http://www.waterwise.org.uk/data/2013_Waterwise_Drought_Report.pdf)

[www.blueprintforwater.org.uk](http://www.blueprintforwater.org.uk)

- The Rivers Trust
- National Trust
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- Wildfowl & Wetlands Trust
- Woodland Trust
- WWF - UK

**Wildlife and Countryside Link**  
**August 2015**



Wildlife and Countryside Link  
89 Albert Embankment, London, SE1 7TP  
W: [www.wcl.org.uk](http://www.wcl.org.uk)

Wildlife and Countryside Link is a registered  
charity (No. 1107460) and a company limited  
by guarantee in England and Wales (No.388951)