Response form

Proposed changes to water company drought plan guideline

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| Your details |
| To help us analyse and assess the consultation responses, we would like you to answer some questions about:   * you or your organisation * your business   Are you providing an individual or personal response, or a response on behalf of an organisation or group?  Please choose one of the following:  £ responding as an individual  £ responding on behalf of an organisation or group  £ other  If you selected (b), what is the name of the organisation or group?  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  If you selected ‘other’ please explain your area of interest.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Privacy notice  The Environment Agency would like to keep you informed about the outcomes of this consultation. If you would like to receive an email acknowledging your response and telling you when we have published the consultation response document, please provide your email address with your response.  By giving us your email address, you consent for us to email you about the consultation. We will keep your details until we have notified you of the response document publication.  We will not share your details with any other third party without your clear and full consent, unless required to by law.  You can withdraw your consent to receive these emails at any time by contacting us at: [:water-company-plan@environment-agency.gov.uk](mailto:water-company-plan@environment-agency.gov.uk)  The Environment Agency is the data controller for the personal data you provide. For more information on how we deal with your personal data please see our [Personal information charter](https://www.gov.uk/government/organisations/environment-agency/about/personal-information-charter) on GOV.UK.  You can email our Data Protection team: [dataprotection@environment-agency.gov.uk](mailto:dataprotection@environment-agency.gov.uk).  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  We would like to keep you informed about the outcomes of this consultation.  If you would like to receive emails acknowledging your response and or telling you when we have published the summary of responses, please select from (tick all that apply):  £ yes, I would like to receive an email acknowledging my response  £ yes, I would like to receive an email to let me know the consultation response document is published  If you have ticked any of the boxes above, please tell us your email address:  Email:  Can we publish your response to this consultation?  £ yes  £ no  If you answered no, please tell us why: |

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| Please tell us how you found out about this consultation: | |
|  | £ from the Environment Agency |
|  | £ from another organisation |
|  | £ through an organisation, group, or trade association you are a member of |
|  | £ press article |
|  | £ social media e.g. Facebook, Twitter |
|  | £ through a meeting you attended  £ other (please specify)  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

How we will use your information

The Environment Agency will make all responses publicly available during and/or after the consultation, unless you have specifically requested that we keep your response confidential.

We will not publish names of individuals who respond.

Throughout the consultation we will make all comments (excluding personal information) publicly available on our Citizen Space website. This includes comments received online or by email, unless you have specifically requested that we keep your response confidential.

We will not publish names of individuals or personal data, but we will publish the name of the organisation for those responses made on behalf of organisations.

We will not respond individually to responses. After the consultation has closed, we will publish a consultation response document on GOV.UK and contact you to let you know when this is available.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

Returning your response

Your response to this consultation needs to be returned by 11:59 on 26 January 2025.

We would like you to use this form if you are not submitting your response online. You can return it by email to [water-company-plan@environment-agency.gov.uk](mailto:water-company-plan@environment-agency.gov.uk).

We welcome your views on our proposed changes to the water company drought plan guideline

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| What water companies “must” and “should” include in their drought plans The guideline sets out what ‘must’ and ‘should’ be included in a water company drought plan proportionate to the company’s customer base and how the company receives its supplies.  Where the word “must” is used in the guideline, it means that the statement is a statutory requirement and that a company risks not being legally compliant if it does not follow a “must”. If the word “should” is used in the guideline, it means we believe the company should follow the advice in the guideline in order to produce an adequate drought plan. If the water company does not follow a “should” it should provide its justification for not doing so. See section 1.2 in the guideline.  Question 1: Is the guideline clear on what water companies “must” and “should” include in their drought plans?  Please choose one of the following answers:  a) Very clear  b) Clear  c) Neutral  d) Unclear  e) Very unclear  f) Prefer not to answer  Why do you think this? Please answer below. |
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| |  | | --- | | How water companies assign their drought actions to the severity of a drought (drought levels) We have improved our explanation of how water companies assign a drought level to each of the drought management actions they plan to implement in a drought.  We have defined each drought level and provided examples of the types of demand and supply actions that should be implemented at each level. We have updated the table used to illustrate the relationship between each drought level and the example demand and supply actions. We have further defined the actions a company will take as a severe drought worsens as level 3b. Level 3b actions are extreme drought management actions that a water company plans to implement in order to delay implementation of its emergency plan for drought. See section 4.1 “Assign a drought level to your drought actions” in the guideline.  **Question 2: Is the guideline clear on how water companies should show the actions they will take at each drought level?**  Please choose one of the following answers:   1. Very clear 2. Clear 3. Neutral 4. Unclear 5. Very unclear 6. Prefer not to answer   **Why do you think this? Please answer below.** | |  | |  | | |  | | --- | |  | |  | | Water companies should do more to reduce residential customer demand Water companies must set out what actions they will take to reduce customer demand or use of water during dry weather and a drought. There are several actions water companies can take to reduce household customer demand such as reducing leakage and implementing temporary use restrictions such as a hosepipe ban. Water companies can also use non-essential use bans to help reduce business customer demand.  We have proposed that water companies should do more to encourage their residential customers to significantly reduce their water use as a drought worsens, after temporary use restrictions have been implemented. Water company actions to further reduce residential customer demand would help conserve public water supplies for longer and reduce the risk of causing further environmental damage. The successful use of further demand actions by water companies would help delay the need for emergency measures such as standpipes and rota cuts. See section 4.2.2 “Further demand actions to significantly reduce residential customer water use” in the guideline.  **Question 3: Are the further demand actions proposed to reduce residential customer water use in the guideline adequately explained for the water companies?**  Please choose one of the following answers:   1. Strongly agree 2. Agree 3. Neither agree or disagree 4. Disagree 5. Strongly disagree 6. Prefer not to answer   **Why do you think this? Please answer below.** | |  | | |  | | | Extreme drought management actions The section on extreme drought management actions was introduced to the guideline in 2022. We ask water companies to consider what actions they could take as a severe drought gets worse. These actions would delay or reduce the likelihood of companies implementing their emergency drought measures such as rota cuts and standpipes to conserve limited supplies. Water companies have emergency plans for drought which are separate to their drought plans, and which are not in the public domain.  We have proposed in the guideline that water companies should now do more to investigate the viability and the ease of implementing the extreme actions they list in their drought plans. We have also proposed that water companies could plan for a very severe drought using alternative pathways. See section 4.4 “Extreme drought management actions” in the guideline.  **Question 4: Do you think the information provided on extreme drought management actions will help water companies in planning for a more severe drought in the future?**  Please choose one of the following answers:   1. Strongly agree 2. Agree 3. Neither agree or disagree 4. Disagree 5. Strongly disagree 6. Prefer not to answer   **Why do you think this? Please answer below.** | |  | |  | |  | | | More details on the non-technical summary for customers and stakeholders Water companies are expected to provide a non-technical summary to help customers and stakeholders understand the importance of drought planning, what companies will do during a drought and how customers and others might be affected. Water companies should publish their non-technical summaries on their websites for their customers.  We’ve added more detail in the guideline on what water companies should consider when providing this non-technical summary to help customers and stakeholders better understand their plans. See section 9.1 “Customer and stakeholder summary” in the guideline.  Question 5: Do you think customers and stakeholders will gain a better understanding of their water company drought plans through the water company summaries?  Please choose one of the following answers:   1. Strongly agree 2. Agree 3. Neither agree or disagree 4. Disagree 5. Strongly disagree 6. Prefer not to answer   **Why do you think this? Please answer below.** | |  | |  | |  | | | General feedback on the updated water company drought plan guideline  We have improved the presentation and clarity of information in the guideline for water companies to follow when they draft their drought plans. We have added some new information on actions to reduce residential customer demand, the use of alternative pathways in an extreme drought and on recovery from drought. We have reduced the number of appendices by removing technical information and including it as part of the supporting supplementary technical guidance we provide to water companies.  Please provide us with any further feedback on the guideline such as any areas which you think are unclear, missing or wrong.  Question 6: Is there anything in the guideline which you think is unclear, missing or wrong?   * Yes * No   Please explain your answer and refer to the sections and page numbers relevant to your comments. | |  | |  | |  | | |  | |  | |  | | | | |