

# Portsmouth Water



## STATEMENT OF RESPONSE TO THE REPRESENTATIONS ON THE DRAFT DROUGHT PLAN 2021

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# 1 INTRODUCTION

## 1.1 [Overview of the Drought Plan](#)

Water companies in England and Wales have a duty to prepare and maintain Drought Plans under Section 39B and 39C of the Water Industry Act 1991, as amended by the Water Act 2003 and in accordance with the Drought Plan Regulations 2005 and the Drought Plan Direction 2020.

The Drought Plan should show how we will provide a secure supply of water and protect the environment during dry weather and droughts. A Drought Plan is an operational plan that sets out what actions we will take before, during and after a drought. It also sets out how we will assess the effects, including the environmental impacts of our actions and what we will do to monitor and prevent or mitigate these effects.

The water company drought plan process involves:

- Preparing a draft Drought Plan and submitting it to the Secretary of State (SoS) at least every 5 years from the date the previous Drought Plan was published.
- After being directed from the SoS, publishing and distributing the draft Drought Plan and carry out a public consultation, receiving representations from both statutory and non-statutory stakeholders.
- Assessing the representations received and preparing a statement of response with a revised draft Drought Plan taking account of the representations received.
- After confirmation from the Secretary of State, prepare and publish the final Drought Plan

## 1.2 [Overview of the public consultation process](#)

On 7<sup>th</sup> June 2021 we published our draft Drought Plan for consultation. The public consultation ran for an 8-week period and closed on 2<sup>nd</sup> August 2021. We issued an email letter outlining the consultation and links to the documents to 295 stakeholders from 233 organisations (Appendix A). To ensure our plan was accessible to a wide range of stakeholders and customers, we also produced a stakeholder summary alongside the plan and supporting appendices and made this available to be viewed and downloaded on our website. We also offered to post paper copies of these documents upon request. The environmental assessment report for our drought permit was also available upon request and was not published online due to national security restrictions.

We invited representations on the draft Drought Plan to be sent to the Secretary of State. In accordance with requirements prescribed in Paragraph 5 of The Drought Plan Direction 2016, we are required to publish a Statement of Response to representations within 15 weeks after the date on which we published our draft Drought Plan. In accordance with this requirement, this Statement of Response was published on 20<sup>nd</sup> September 2021.

We undertook a range of consultation activities to engage with everyone who may be impacted by the actions contained in the draft Drought Plan. These included:

- Website: Online questionnaire
- Stakeholder engagement
- Retailer engagement
- One-to-one meetings and engagement
- Customer research and insight

A number of these consultation activities were undertaken in partnership with Southern Water due to the high interconnectivity of customers and collaboration between the Water Resource

Management Plans of both water companies. This was necessary to ensure that each company's Drought Plan takes account of the other's circumstances, providing a more resilient and effective joint response.

### 1.2.1 Engagement material

To facilitate an accessible consultation with a broad range of customers and stakeholders, we developed materials to support the technical draft Drought Plan documents. This included:

- A seven-page stakeholder summary document with information on water sources, types of drought, frequency of drought actions to secure water, restrictions and exemptions- with supporting graphics and imagery
- A 10-question survey (online and included in the summary document) to aid responses
- A dedicated consultation area on the Portsmouth Water website.



### Media

A news release promoting the contents of the draft Drought Plan and the consultation was issued to media outlets in Hampshire and West Sussex, generating coverage in About My Area and the Petersfield Post, with further

### Website

The central point of the consultation was the website, where a standalone section was created including an introduction, a link to the summary document and full suite of technical documents, and a 10-question online survey to share feedback.

A copy of the online questionnaire is included in Appendix B.

During the consultation (7 June – 2 Aug), the Drought Plan consultation section had 368 page views and 143 unique views, with an average time on page of 55 seconds. The survey page had 44 page views and 16 unique views. The survey was completed online eight times.



follow up coverage in the Portsmouth News and Gosport Globe.

### 1.2.2 Stakeholder engagement

We engaged with a broad range of stakeholders through direct emails, informing them of our draft Drought Plan and the consultation and the ways they could get involved. We also hosted a webinar, which was flagged in each email update.

#### Types and number of stakeholders engaged via email

We contacted 295 stakeholders from 233 organisations, including local authorities, community and environmental groups, consumer representatives and business and trade organisations. Figure 1 below shows how many stakeholders from each category were contacted and the number of individual organisations within each category.

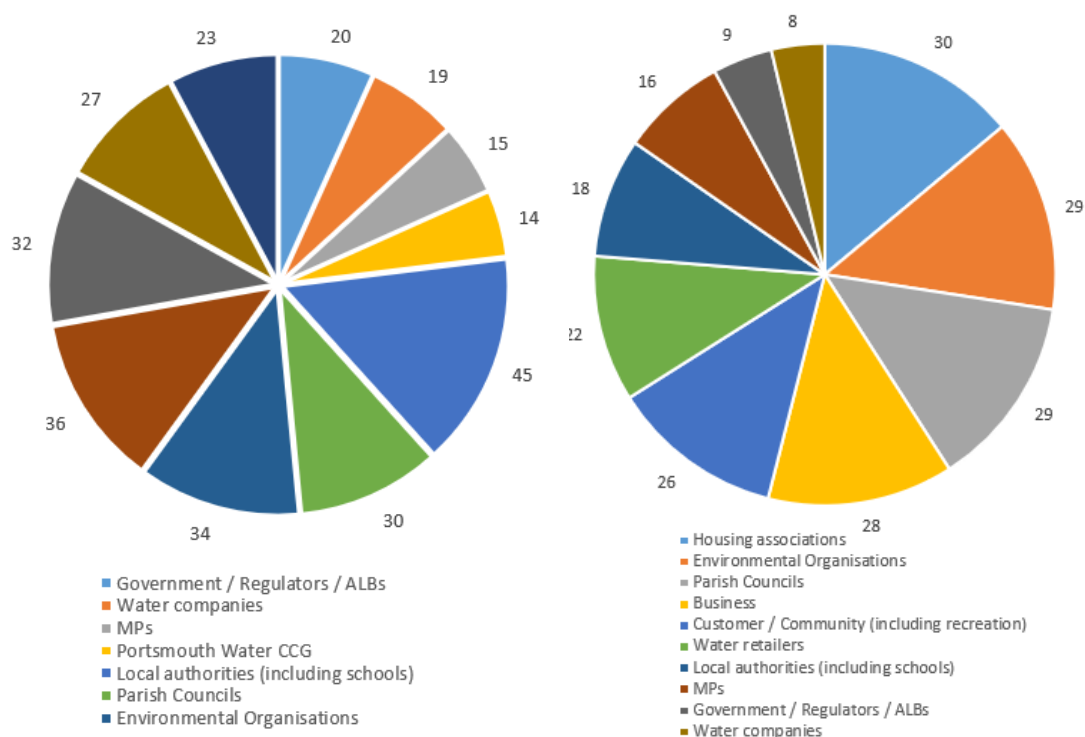


Figure 1 Category of stakeholders contacted and the number of individual organisations within each category.

We emailed targeted stakeholder groups (regulators, government and Waterwise) on 7<sup>th</sup> June when the consultation was launched, with a follow up to wider stakeholders on 14<sup>th</sup> June, announcing the consultation was underway and inviting them to a joint webinar with Southern Water on 8<sup>th</sup> July. The gap between emails was so that engagement with wider stakeholders on the Drought Plan would not be simultaneous with engagement that was being undertaken with similar stakeholders on the Havant Thicket Reservoir project.

An email was also sent to around 40 stakeholders on 25<sup>th</sup> June, announcing the consultation and highlighting the webinar, following bounce back emails that we had received, and where contacts within the organisations had changed compared to earlier correspondence. A final email was sent to all stakeholders on 20<sup>th</sup> July, thanking them for their feedback so far, reminding them of the closing date and providing links to both the consultation documents and a recording of the webinar held with Southern Water.

A key element of the engagement with stakeholders was the webinar, which was held in partnership with Southern Water. Members of both companies' water resource teams walked through the main

points of the plan, answered questions raised by attendees and carried out polls to elicit feedback. It was attended by 23 representatives from:

- Gosport Borough Council
- Henfield Parish Council
- Broadbridge Heath Parish Council
- National Allotment Society (Southern Region)
- Friends of Staunton Country Park (Havant)
- National Allotment Society
- Fawley Parish Council
- Isle of Wight Council
- The Piscatorial Society
- Drinking Water Inspectorate
- CESSA Housing Association
- Havant Thicket Reservoir Stakeholder Group Chair
- Rowlands Castle Parish Council
- Sussex Chamber of Commerce
- British Swimming Pool Federation
- Environment Agency
- CC Water
- Office of Caroline Dinenage MP for Gosport
- Office of Stephen Morgan MP for Portsmouth South
- Transition Southampton
- CPRE Hampshire
- A riparian owner.

Six polls were carried out during the webinar covering 10 questions aligned with the wider consultation survey. These were completed by between 10 to 18 attendees for each question – the results are outlined in section 2. A recording of the webinar was shared with stakeholders to circulate more widely among their organisations, which received 24 subsequent views.

### **1.2.3 Retailer engagement**

Retailers were engaged during the consultation through direct emails promoting the draft plan and the consultation, and through participation in a collaborative regional webinar with other water companies, co-ordinated through Water Resources South East.

The webinar (held on 2<sup>nd</sup> July) was attended by representatives from Wave and ADSM (Advanced Demand Side Management). The water company representatives presented information about water company Drought Plans in general, as well as how we manage drought planning in the South East. We explained the purpose of Drought Plans, and the triggers and actions which they set out to enable water companies to proactively manage the risks associated with drought. There was a focus on elements which would be particularly of interest to retailers, including demand management, communications and temporary use restrictions.

We also explained how we as a group are working together to align our drought management processes where possible, which ensures less confusion for our customers and helps to improve the effectiveness of drought communications.

Two recordings, slides and consultation documents were subsequently shared with retailers and there have been nine further views of the recordings:

- Introduction to drought planning
- Drought planning policies and triggers in the South East

### 1.2.4 One-to-one meetings and engagement

All stakeholders were offered one-to-one phone calls and online meetings with us to further inform the consultation. We held a number of these with regulators and stakeholders including:

- Regulator discussions (Environment Agency and Natural England) with Southern Water on drought permit and order monitoring and mitigation in West Sussex
- Phone call with the Horticultural Trades Association, representing organisations in the Portsmouth Water supply area
- Online meetings with Southern Water on bulk supply agreements and the Itchen Drought Order

### 1.2.5 Customer research and insight

We carried out dedicated research with customer focus groups in our region, in collaboration with Southern Water, to ensure we heard the views of a wide range of representative customers during the consultation period. The table below shows a summary of the different programmes and activities carried out, including details on the approach adopted.

*Table 1 Summary of customer research programmes and activities carried out*

Project/ Programme	Project Overview	Approach and sample
Water Futures 2050 (Young people)	Online panel of future/young customers who come together every few months to review elements of Southern Water's long-term strategy, so have been very engaged in water resources in 2020-21.	<b>One-week online community</b> with 46 participants ( <b>including 10 Portsmouth Water customers</b> ) introduced to the two company's Drought Plans. The group included super future customers (14 to 15-year-olds still in education), future customers (16 to 21-years-old in education) and first-time bill payers (less than 12 months paying their bills).
Non-Household Consultation	An existing network of businesses across Portsmouth Water and Southern Water's region engaged on the draft Drought Plans.	25 x 1-hour interviews with business customers (mix of those who are reliant on water for their product /service). <b>This included 8 businesses from the Portsmouth Water area.</b>
Drought Plan groups (Household)	Specific groups set up to have detailed discussion around the draft Drought Plans, which was provided to participants prior to the focus groups. We gauged feedback on the plans, comprehension of the plans, as well as support for the principles and their views on how we communicate.	<b>1 x group of 8 Portsmouth Water customers in a 2-hour focus group</b> <b>1 x additional group of Water Futures 2030 panellist who are household customers from across Hampshire, Sussex and Kent.</b> 2 x groups of household customers who have been part of Southern Water's Water for Life Hampshire panel
Expert Stakeholders interviews	Engagement of expert stakeholders, which allowed us to have a broader view of what our customers from different backgrounds and cultures need during drought conditions.	6 x 1-hour interviews with representatives of harder to reach customers who <b>represent both Southern Water and Portsmouth Water customers</b> (including signposting services, housing services, language assistance and supported living representatives).

\*Due to collaboration with Southern Water, bold text indicates details specific to Portsmouth Water

## 1.3 Overview of the representations received

In total we received responses from 14 different organisations and individuals. The Environment Agency and Natural England submitted comprehensive and detailed responses in the form of reports and the remainder were from a broad cross-section of stakeholders.



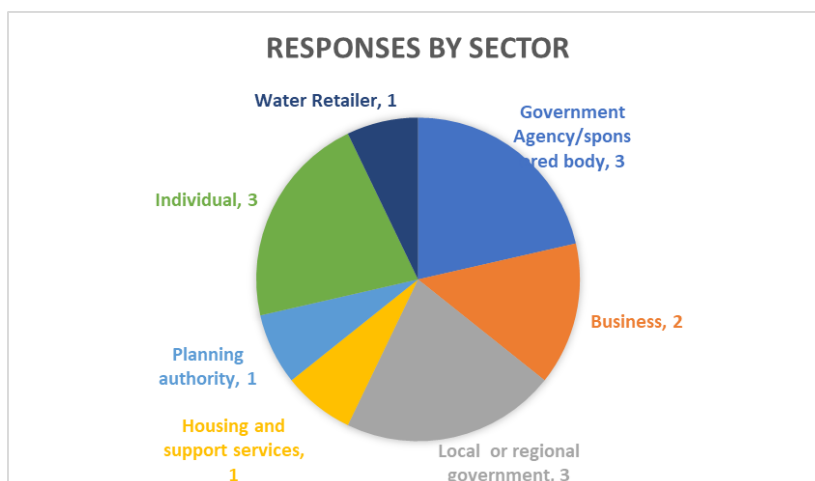


Figure 2 Representations received by sector

From the above organisations, there were a total of five written submissions, a total of seven respondents to the online questionnaire form and three that were a combination of the two (written response also answering the questionnaire). This information is summarised in Table 2.

Table 2 Organisations which submitted written representations and responded to online questionnaire

Organisation	Written response	Questionnaire
EA	✓	
NE	✓	
HTA	✓	
CCW	✓	✓
Buriton Parish Council	✓	
Hampshire County Council	✓	✓
CESSA Housing Association		✓
South Downs National Park Authority		✓
Customer		✓
Customer		✓
Customer		✓
Everflow Water		✓
West Sussex County Council	✓	✓
NFU	✓	

Figure 3 provides an overview of the representations received from Stakeholders giving the main points of their representations and the relevant aspect in the draft Drought Plan. This shows that representations from statutory consultees cover a broad range of aspects, and that multiple respondents made representations relevant to; testing or triggers, supply side actions, the Strategic Environmental Assessment, the Habitats Regulation Assessment, the Environmental Assessment Report and the Communications plan. The sections of the draft Drought Plan that received multiple representations across a plethora of consultees, include demand side actions and exemptions.

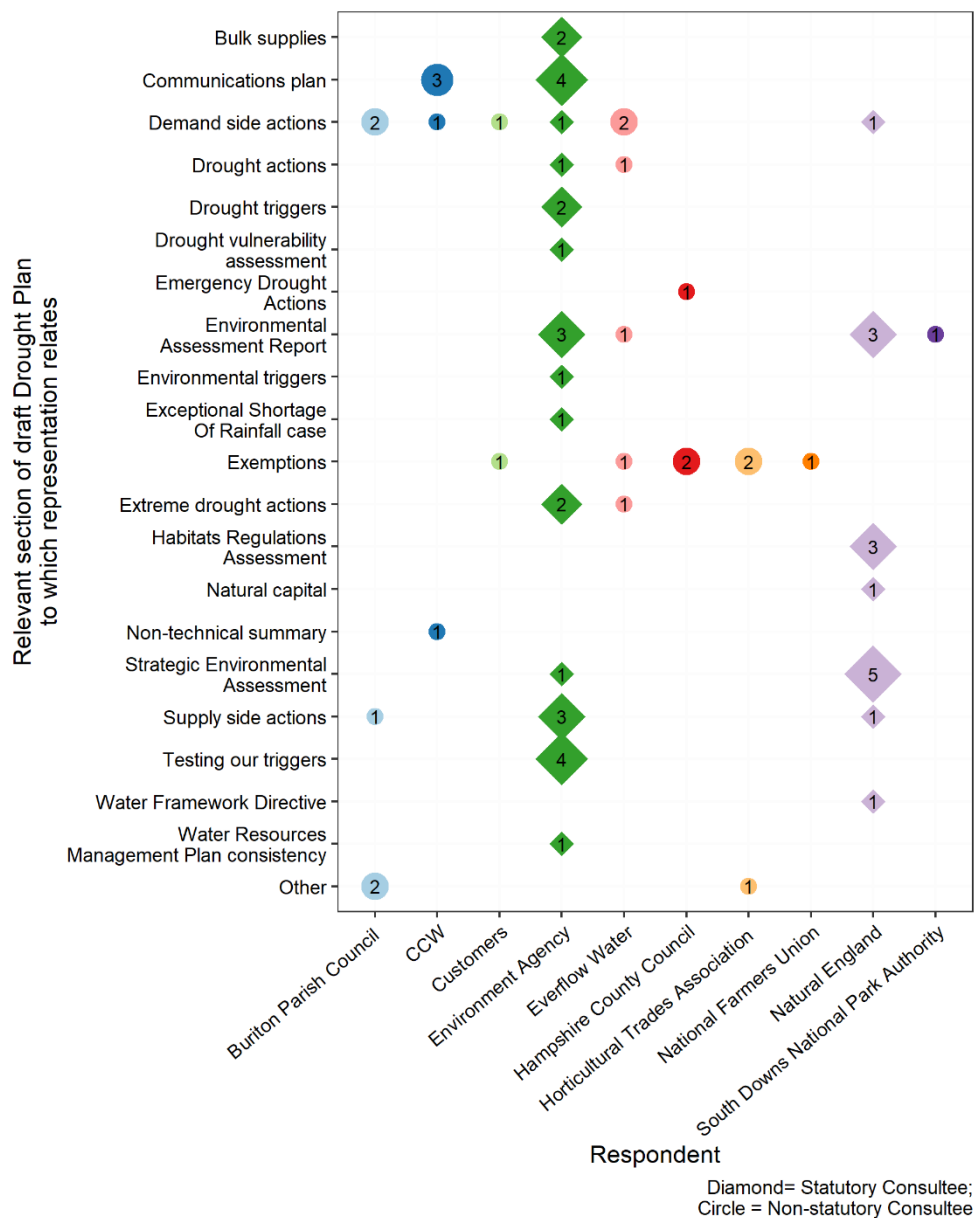


Figure 3 Overview of the main topics raised in the representations by respondents

#### 1.4 [Layout of this SoR document](#)

In order to prevent repetition within the document, the representations have been grouped and will be discussed in two parts:

- Section 2 – Responses from online questionnaires. This includes information on response rates and a summary of any specific issues raised.
- Section 3 – Written representations. This provides an overview of the main points raised in the written responses from statutory consultees and other organisations.
- Section 4- Customer Research Findings. This provides the findings from our bespoke research with our customers.

Appendix D provides the full list of representations that we received, along with our specific responses and changes to the Plan where appropriate. So that the changes we have made can be fully understood, we are publishing a revised draft Drought Plan along with this Statement of Response.

This revised draft Drought Plan has no statutory status, and will be replaced by the final Drought Plan once we receive permission to publish it from Defra.

## 2 DROUGHT PLAN QUESTIONNAIRE RESPONSES

This section presents an analysis of the responses to the questionnaire. Where additional comments were made on each question, a summary of the issues raised and our consideration of the responses are included in Appendix D.

Additional to our website, our questionnaire was also presented to stakeholders taking part in a webinar on the draft Drought Plan during the consultation (in partnership with Southern Water). Attendees voted in an anonymous poll and each webinar poll result is also included in the sections below.

1. Do you think the different levels of drought and the associated actions are easy to understand?

*Webinar poll results:* Ten people said yes, the different levels and actions were ‘mostly’ easy to understand, one said they were easy and three said they were completely easy to understand. One person said no, overall, they were not easy to understand.

*Website questionnaire responses:* All nine questionnaire respondents answered this question. 89% of respondents considered that the different stages of drought used are easy to understand. We welcome confirmation that our ‘triggers’ to identify when a drought is on the way and the action we will take are well understood.

2. Are the proposed restrictions on using water for households and businesses easy to understand?

*Webinar poll results:* Twelve people said yes, the proposed restrictions on water use were mostly easy to understand, two people said they were easy and one said they were completely easy to understand. Three people said no, they weren’t easy to understand.

*Website questionnaire responses:* All nine questionnaire respondents answered this question. 89% of respondents considered that the proposed restrictions on using water for households and businesses easy to understand. No additional detail was provided by the customer that felt proposed restrictions were unclear. It has been positively received that messages associated with restrictions have been aligned with other water companies, using a common traffic light approach, to ensure consistent messaging for customers and reduce confusion regarding stages of drought and related activity.

3. Do you agree with introducing restrictions on using water for households first and businesses afterwards? (To protect jobs and businesses for as long as possible)

*Webinar poll results:* Ten individuals mostly agreed with the ordering of restrictions, two agreed completely, two agreed and four mostly didn’t agree.

*Website questionnaire responses:* All nine questionnaire respondents answered this question. 67% agreed with this approach and 11% responded that they were unsure, while 22% of

respondents did not agree with introducing restrictions on using water for households first and businesses afterwards. A number of respondents recognised the importance of protecting businesses and the local economy.

4. Do you agree with the automatic exemptions from restrictions on using water which apply to everyone? (These are agreed by all water companies in the UK)

*Webinar poll results:* Three people agreed completely with the automatic exemptions, ten mostly agreed and five agreed with them.

*Website questionnaire responses:* All nine questionnaire respondents answered this question. 78% of respondents agreed with the automatic exemptions from restrictions on using water. A number of respondents welcomes the consistent approach to automatic exemptions within the South East and UK and local governing bodies were satisfied with the safeguard measures for vulnerable persons.

5. Do you agree with all the discretionary exemptions from restrictions on using water? (We agree these for our customers)

*Webinar poll results:* Thirteen individuals mostly agreed with all the discretionary exemptions, two agreed completely, two agreed and one person mostly didn't agree.

*Website questionnaire responses:* All nine questionnaire respondents answered this question. 67% of respondents fully agreed with the discretionary exemptions from restrictions on using water, with 11% raising concerns over specific discretionary exemptions, and 11% disagreed with discretionary exemptions. One respondent felt that differences between automatic and discretionary exemptions were unclear. A number of respondents welcomes the consistent approach to automatic exemptions within the South East and UK and local governing bodies were satisfied with the safeguard measures for vulnerable persons.

6. Do you support the need to use the North Arundel Drought Permit in severe droughts to abstract more water to maintain supplies? (Please get in touch if you'd like to read an environment assessment of the impact of using this permit)

*Webinar poll results:* No similar question was asked during the webinar.

*Website questionnaire responses:* All nine questionnaire respondents answered this question, however 45% of respondents felt that they did not have enough information in order to give a response. 33% of respondents explicitly state that they support the need to use the North Arundel Drought Permit in severe droughts to abstract more water to maintain supplies, but also emphasise their concerns that the permit should only be used when necessary. 22% of respondents disagreed with the North Arundel Drought Permit in severe droughts but provided no additional information on their response.

7. Would you support the introduction of emergency restrictions such as standpipes (water pipes in streets) or rota cuts (where water is only available for a few hours each day) in an emergency to safeguard essential supplies?

*Webinar poll results:* Ten people said it would be acceptable to introduce emergency restrictions on some occasions, three thought it was always acceptable, one individual said it wasn't acceptable on some occasions, one that it was never acceptable and one person was not sure.

*Website questionnaire responses:* All nine questionnaire respondents answered this question. 67% of respondents support the introduction of emergency restrictions such as standpipes or rota cuts in an emergency to safeguard essential supplies, however some respondents articulated that sufficient support should be provided for vulnerable customers or safe operation of essential services. 11% of respondents were unsure, 11% disagreed with emergency restrictions. A further 11% stated that definitions of 'emergency' and 'essential supplies' were insufficient to address the question.

8. Would you be willing to significantly reduce your water use to 50-80 litres of water each day in order to avoid standpipes or rota cuts?

*Webinar poll results:* Twelve people said 'yes, absolutely' they would be willing to reduce their water use to 50-80 litres per day. One person said 'yes, mostly', two said yes and one said no, on most occasions they wouldn't be willing.

*Website questionnaire responses:* All nine questionnaire respondents answered this question, however 45% of respondents noted that this question was not relevant to them as an organisation and not a household. The remaining respondents all felt willing to significantly reduce water use to 50-80 litres of water each day to avoid standpipes or rota cuts. A number of organisational respondents highlighted difficulty with comprehending 50-80 litres of water, and state that clearer messaging is important.

9. Do you think we have got the right balance between reducing demand for water, using the drought permit to produce more water and protecting the environment?

*Webinar poll results:* No similar question asked during the webinar.

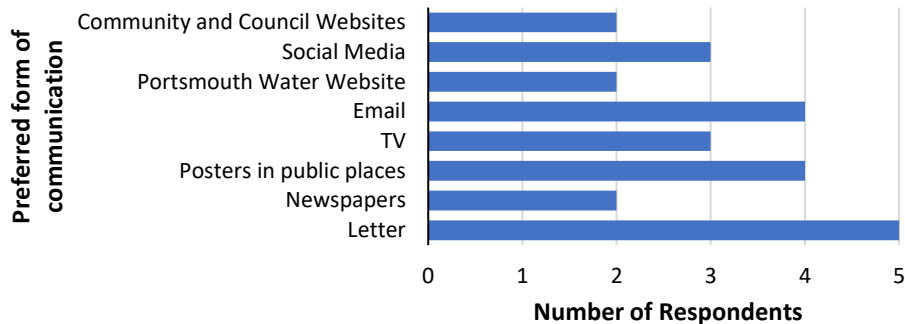
*Website questionnaire responses:* All nine questionnaire respondents answered this question, with 11% of respondents unsure. The remaining 89% all agreed that Portsmouth Water have the right balance between reducing demand for water, using the drought permit to produce more water and protecting the environment. A common theme amongst respondents was placing more emphasis on reducing demand and an increasing role of consumer behaviour in order to prevent more severe drought levels.

10. What do you think is the best way to tell customers about a drought and restrictions? (Please choose top three)

*Webinar poll results:* Direct emails and letters, media (TV, radio, newspapers) and 'other' all received four votes, followed by three votes for social media and one vote each for third-party channels and on the ground activity by water company employees.

*Website questionnaire responses:* All nine questionnaire respondents answered this question. Responses to options are presented below. This demonstrates that a wide range of methods of

communication are necessary to reach all customers. It should be noted that some exclusively selected 'letter' while others only selected digital options.



### 3 WRITTEN REPRESENTATIONS

#### 3.1 [Introduction](#)

Additional to the questionnaire responses, we received a total of 8 written submissions from organisations during the consultation raising a total of 68 points to be considered.

Some of the written submissions are lengthy, raising numerous different issues, whereas others are relatively focused and short. For consistency, we have adopted the same approach to each of the representations we received. We have assessed each of the responses that we received, identified the issues that they raise and then responded to them, highlighting where changes are proposed to be made to the Drought Plan in response. This is all set out in the detailed table in Appendix C to this Statement of Response document.

As previously noted, we have published a Revised Draft Drought Plan alongside this Statement of Response, to highlight the changes we propose to make. This includes a revised draft Drought Plan, and revised draft versions of the annexes that support the Drought Plan. The revised draft Drought Plan documents do not have any statutory status, and the final Drought Plan will be published once we receive confirmation from Defra that we may do so.

#### 3.2 [Environment Agency](#)

The Environment Agency made detailed representations on our draft Drought Plan providing a comprehensive report with recommendations backed up with evidence, and their view on whether Portsmouth Water has met relevant legislations and Government Directions. The report was split into four sections: an overall summary, compliance with legislation, recommendations and improvements with an evidence report as an Appendix to the report.

We have reviewed the representations and, as previously noted, we have met with the Environment Agency since receiving its representations, and discussed and clarified the points raised, and additions to this Statement of Response and revised plan that we propose to make as a response.

The Environment Agency consider that our plan mostly demonstrates that it will provide a secure supply of water and sufficiently protects the environment during a drought. The plan is said to be clear and easy to follow, setting out most of the steps that we would take as a drought progresses. The main recommendations suggested in the representation were:

- Clarity around the sequence of actions we would take in a severe and extreme drought.
- More work on our North Arundel drought permit to ensure we are application ready, including providing more detail on the way we will define our Exceptional Shortage of

Rainfall Case (ESoR) and additional work on the Environmental Assessment Report (EAR).

- Consistency around the operation of bulk supplies with Southern Water.

Details of the Environment Agency representations, our response to them, and the changes we propose to make to the Drought Plan as a result, are set out in the detailed table in Appendix C to this Statement of Response document.

### **3.3 [Natural England](#)**

Natural England also made detailed representations on our draft Drought Plan. The representations related to both the principles of our drought planning approach, and to the detailed measures we propose to adopt in advance of, during and following a drought.

We have reviewed the representations and, as previously noted, we have met with Natural England since receiving its representations, and discussed and clarified the points raised, and additions to this Statement of Response and revised plan that we propose to make as a response.

The main points raised in Natural England's representation were:

- The plan has only carried out a partial Habitat Regulation Assessment (HRA) screening and so it is not clear whether there are any significant effects on Habitats sites.
- The plan has not undertaken a Strategic Environmental Assessment (SEA) process.
- The plan appears to have selected options with the least/ lesser environmental impacts in preference to those with greater impacts, but the conclusion for this assessment have not been presented.
- The plan has not been assessed for the potential for net gain in biodiversity.
- The Natural and Social Capital of the plan options has not been assessed.

Details of the Natural England representations, our response to them, and the changes we propose to make to the Drought Plan as a result, are set out in the detailed table in Appendix C to this Statement of Response document.

### **3.4 [Horticultural Trades Association](#)**

The Horticultural Trades Association submitted a written representation on our Drought Plan welcoming and support the principles of our plan. We have reviewed the representations and held a meeting with the Horticultural Trades Association since receiving its representations, to discuss the main points raised.

The main points raised in their representations were to consider exemptions for horticultural businesses in non-essential use bans, and that the temporary provision for watering newly bought plants be nuanced. Moreover, they included comments on future opportunities for collaboration with the water industry.

Details of the Horticultural Trades Association representations, our response to them, and the changes we propose to make to the Drought Plan as a result, are set out in the detailed table in Appendix C to this Statement of Response document.

### **3.5 [CCWater](#)**

In addition to its questionnaire response, CCW submitted additional comments in a written submission that included comments on how we plan to handle communications during a drought, including communication with non-household customers, and the importance of providing early notice of a developing situation and a possible introduction of restrictions. Comments were also made around how we will tackle leakage during a drought event.

Details of CCW's representations, our response to them, and any changes we propose to make to the Drought Plan as a result are set out in the detailed table in Appendix C to this Statement of Response document

### **3.6 Buriton Parish Council**

Buriton Parish Council submitted a written representation identifying the need for water companies to reduce leakage and enhance storage capacity and promote water efficiency support. Comments were also made around the importance of water usage by farms producing food for the nation not being hampered during drought; and additional abstractions to only be considered from rivers, not from aquifers.

Details of Buriton Parish Council representations, our response to them, and any changes we propose to make to the Drought Plan as a result are set out in the detailed table in Appendix C to this Statement of Response document.

### **3.7 Hampshire County Council**

In addition to its questionnaire response, Hampshire County Council submitted additional comments in a written submission that included comments on providing a clear definition of 'vulnerable' customers in the context of drought strategy. Comments were also made about the need to consider specific industrial activities that require dust suppression when applying restrictions and defining exemptions. Finally, they emphasised the importance of communicating and working together should emergency restrictions be required, such as standpipes, to ensure the safe operation of the public highway.

Details of Hampshire County Council's representations, our response to them, and any changes we propose to make to the Drought Plan as a result are set out in the detailed table in Appendix C to this Statement of Response document.

### **3.8 West Sussex County Council**

In addition to its questionnaire response, WSCC submitted additional comments in a written submission that included comments on Portsmouth Water area being a water stressed area, the importance of protecting natural resources and adapting to climate change. The Council stressed how pleased they are to be collaborating with the three water supply companies across the county on a behaviour change campaign on water use reductions. We were pleased to learn about their 2<sup>nd</sup> Cycle Flood Risk Management Strategy and the actions associated with that, which supports water efficiency and conservation. Additional points that were raised as part of the questionnaire responses are included in Section 2 of this SoR.

### **3.9 National Farmers Union**

The National Farmers Union provided comments on our summary document, suggesting the consideration of exemptions to agricultural activities where food production is crucial.

Details of the National Farmers Union representations, our response to them, and any changes we propose to make to the Drought Plan as a result are set out in the detailed table in Appendix C to this Statement of Response document.



## 4 CUSTOMER RESEARCH FINDINGS

We carried out bespoke research with our customers in collaboration with Southern Water, engaging four key groups – household customers, young people, businesses and expert stakeholders. This was to ensure we heard the views of representative groups across our customer base which is particularly important as delivery of our Drought Plan can only succeed with the support of our customers.

### 4.1 [Key findings across all strands of research](#)

The key findings from across all strands of this research are summarised below.

#### **The impact of Covid**

- The experience of Covid-19 has had a clear impact on customers' views of preventative and emergency planning, restrictions, and compliance, which they applied to the draft Drought Plan.
- People are more prepared for crisis management and there are lessons to be learnt from the Government response, communication and public needs.
- When applied fairly, lockdown has increased the acceptance of emergency and restrictive measures.
- Education, clear advice on actions and community working support implementation.

#### **The overall approach, restrictions and exemptions**

- Customers are predominantly accepting of the proposed restrictions – they understand the need.
- Customers agree with the principles behind how the restrictions are applied; they like and understand the 'traffic light' system.
- Some exemptions provoke a reaction, with queries around the blanket exemption for Blue Badge Holders and Priority Service Register (PSR) customers for all activities (e.g. watering plants); the ability of wealthier customers to employ businesses to undertake restricted tasks on their behalf (e.g. washing cars, filling a swimming pool) and the challenges for those in agriculture and horticulture who rely on mains supply.
- Business customers are open to restricting their use earlier on in droughts and exploring ways in which they can become more resilient. They want to do more now to minimise future impact.
- For young people, the pandemic has made restrictions feel fairer and more acceptable.
- Young people are also willing to do their part in a crisis once they're on board with the idea (Covid restrictions were used as a reference).
- There is a misperception of what drought would look like in the UK – meaning customers are unprepared for the reality of how it would impact their lives, particularly emergency measures, and these could be presented in a more relatable format – particularly the 50-80 litres limit.
- Vulnerable audiences require a higher level of service during severe restrictions and other household customers support this prioritisation.

#### **Communication and engagement**

- Household customers feel the Portsmouth Water plan is clear, accessible and written for customers.
- Business customers would welcome more detail and overall there is a desire for more information around the environmental implications of the North Arundel Drought Permit.
- For future customers, it is important for the company to emphasise how it is working to play its part and engaging with business and agriculture, so that the changes are fair.

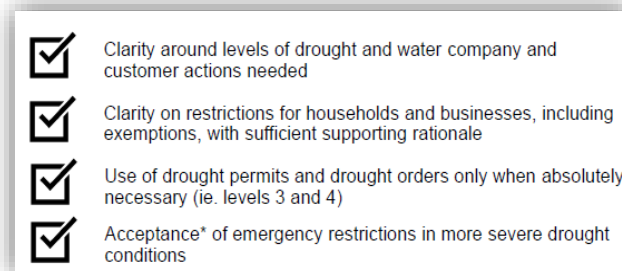
- The consensus is that more needs to be done now to make people aware from a young age about the issues we face.
- An integrated communication plan needs to use multiple channels, build up the relevant messages over time and vary the approach to have the greatest cut through.
- Representatives of harder to reach communities felt communication of the Drought Plan would benefit from 'community-styled' touchpoints such as newsletters, social media and peer to peer advocacy through leaders, service providers and caregivers.

## 4.2 Feedback from each customer type:

### 4.2.1 Household customers

Overall, Portsmouth Water's Drought Plan achieved a strong level of acceptance from household customers:

Key areas identified include:



- Consensus that it's fair and right to protect jobs and livelihoods first and foremost. Some feel businesses are more cost-conscious and less likely to waste water.
- Feels appropriate to have exemptions to ensure fairness (agreed by all water providers), although some examples are confusing and some could prompt resentment (e.g. Blue Badge holders filling swimming pools, watering lawns). There is total agreement on exemptions for health purposes.
- Seen as important there is a process to apply for permission to use drought permits to avoid environmental damage. More information desired on the potential environmental impact sought.
- Examples and infographics are needed to help convey water volumes – particularly around every day use and 50-80 litres to aid understanding of the implications of the restrictions. Terms of 50-80 litres do not hold meaning for customers.
- The traffic light system is welcomed but would prefer red for level 4 to convey emergency.
- Rota cuts are seen as fairer than standpipes.
- Preference for communication is SMS, leaflets and potentially an app, alongside general awareness multi-modal communication channels.

**Portsmouth Water household customer:** *"We need some clarity as to what 80 litres of water equates to i.e. 2 showers per person for 5 minutes etc."*

### 4.2.2 Young people

As described previously, the engagement with young people was undertaken with 46 representatives of varying age groups in a week-long online community format from Portsmouth Water (10) and Southern Water's (36) supply areas. The group's feedback is recorded as a whole.

Young people have shown a willingness to play their part in a crisis, but only when they're on board with the idea that a drought could happen. However, the misperception of what drought would look like in the UK means they are unprepared for the reality of how it could impact their lives.

Overall, Portsmouth Water’s plan was positively received by young people. Restrictions on customers and businesses and emergency measures, were seen as largely appropriate and fair.

**Young people identify key tensions that would have to be carefully balanced for plans to be accepted**

Protecting people	<b>VS.</b>	Protecting the environment	It was expected that the environment would be protected almost to the same extent as people, and as much as possible for this trade-off to be avoided.
Ensuring water availability now		Preventing longer term damage	Whilst ensuring water levels in the moment is important, young people don't want SW or PW to reach a point where damage is irreversible and contributes to underlying water scarcity issues.
Equal rules		Fair outcomes	Young people embrace exemptions as a way to protect the vulnerable and ensure fair outcomes. On the whole, however, equal rules are needed for the general public to ensure adherence to the rules and fair usage of water.
Penalties		Incentives	There is an underlying sense that the plan relies on penalties / negative potential consequences, whereas customers could be incentivised to reduce water usage during the impending drought or drought phases.

Key findings of the research were:

- Current associations with ‘drought’ only suggest emergency droughts and there is little appreciation for their likelihood in the UK, so there is a need to inform on this as a starting point and an opportunity to create behaviour change.
- Young people consider droughts through their experiences of Covid-19. The pandemic has made strict restrictions feel fairer and more acceptable. They would expect water companies to act quickly and decisively if required and would be willing to follow strict measures.
- At the early stages of impending drought, young people don’t feel that their lives will be impacted directly, there is a desire for Portsmouth Water to take preventative action.
- They accept the plan is important and necessary, given that advanced planning can minimise the impact to themselves, people in vulnerable situations and the environment.
- Young people respond well to the escalation of the drought stages, which makes sense to them.
- In a drought, future customers feel more concerned about the risk to the environment and think the need to apply for permits is sensible.
- While the restrictions feel appropriate, young people feel some recreational use of water could be allowed earlier on and question prioritising businesses over households at this stage.
- Young people see ‘severe drought’ as the tipping point where they want tangible direction on what to do and why – lockdown mentally prepared them to deal with restrictions.
- This is also a stage where young people accept the implications behind the drought order but become torn between protecting the environment vs people.
- They feel the government should step in sooner rather than later to prevent emergency droughts and should be responsible for emergency messaging.
- Some of the terminology used was felt to be too technical and difficult to understand e.g. many were unsure what an aquifer is, or sea tankers.

**Future customer:** *"I'm only 20. I've never been told to take these actions. I find this very serious. This could be normal in a couple of years. I think droughts will get worse. I take it seriously."*

#### 4.2.3 Business customers

Insight with business customers included eight one-hour interviews with businesses in the Portsmouth Water supply area (five who are very reliant on water and three who are less so). This was conducted alongside interviews with 17 Southern Water business customers and the findings combined.

Business customers
<ul style="list-style-type: none"><li>• Social networks (professional and personal) create momentum by association</li><li>• Business customers feel they have a 'ROLE TO PLAY' within their local community</li><li>• They EMBRACE INFORMATION THAT COMES TO THEM, it is unavoidable</li><li>• Emails or water bills can be easily ignored</li></ul>

To businesses the restrictions make sense, nothing feels unfair – even in the event of an escalating drought. The Drought Plan is seen as a positive document which is comprehensive and forward thinking.

Key findings were:

- There is a general feeling among businesses that they would happily engage with water-saving measures now in the same way as domestic households. More can be done to explore and educate non-household customers.
- Businesses feel they have a responsibility towards local matters – they feel part of a community, somewhat dependent on it and feel it is only fair they should be actively involved with initiatives that affect everybody around them.
- Measures, restrictions and exemptions were largely felt to be fair and proportionate. The later stages of water sourcing measures appeared to be the sensible use of existing resource.
- There was an appetite among businesses for water recycling to be elevated in importance.
- Businesses also feel more could be asked of them in the event of Temporary Use Bans being introduced – there is a genuine willingness to engage at any point when drought is a threat.
- In terms of exemptions, the Blue Badge/PSR exemptions were questioned by business customers, however, they also felt it made sense not to further burden and distress those who find life challenging anyway and who can already find change very stressful.

**Portsmouth Water retail customer (manufacturing):** *"Rather than escalating things, how should we maintain normal, they should have more emphasis on media campaigns vs. starting action only when things get bad."*

**Portsmouth Water retail customer (less reliant on water):** *"Getting everybody to save water is very important ... a small percentage over time can make a big difference in times of drought."*

#### 4.2.4 Expert stakeholders

Insight interviews were also carried out with six external stakeholders operating in Portsmouth Water and Southern Water's supply areas – representing harder to reach audiences. These included signposting services, housing, language assistance and supported living representatives.

This group largely felt the measures and exemptions were fair and proportionate. They saw little reason why their clients would necessarily respond differently to other domestic customers.

Key findings were:

- They identified certain groups who might struggle, e.g. low-income families reliant on entertainment at home (paddling pools) or elderly, more vulnerable customers, who might struggle to adapt.
- They would expect the power of 'community' to rally and advocated forward planning to put support measures in place.
- Non-Essential Use bans were positively received but with the hope that in severe drought the Government would step in with benefits to support where people's livelihoods are impacted.
- They didn't see an issue overall with reducing use in a severe drought but felt they needed a better understanding of what this looks like and what it would require in terms of behaviour change.
- External stakeholders could see that this might present challenges to some e.g. the elderly and those with strict routines because of mental/physical/disabilities.
- In comparison to future customers, who expressed significant concern for the environment, expert stakeholders did not automatically express opinions on environmental care and protection. Their concern was more focused on the day-to-day impact on lives.
- They suggested Black and Minority Ethnic (BAME) communities, EU immigrants, low-income customers and the elderly may benefit from tailored communication.
- They echo the view of business customers and feel communication would benefit from 'community' styled touchpoints such as newsletters and peer-to-peer advocacy through community leaders, service providers and caregivers to build trust, with communication tailored to their needs.
- Materials that customers can relate to and engage with can be key, e.g. in different languages or tailored for geographical areas.

**Expert stakeholder (supported living agency):** *"The elderly can be forgetful ...they've also lived through the war so would be a bit sceptical about something like this ... during the pandemic we had to get in touch quickly with families and caregivers and give good solid advice."*

**Expert stakeholder (advocacy and language assistance):** *"They would be suspicious of someone who comes to their home to help or sell something ... there's a lack of trust which I can confirm through Covid vaccinations ... they don't trust someone who wants to give them something ... it's cultural."*

\*KISS- Keep It Simple and Straightforward

Figure 4 breaks down the feedback into four key components to maximise drought behaviours with these audiences. The full set of insight reports for all the customer groups referenced above are available in Appendix H.

EXPLAIN	DEMONSTRATE (AND INCENTIVIZE)	REINFORCE	KISS *
<ul style="list-style-type: none"> <li>• CONFRONT PERCEPTIONS OF DROUGHT CAUSES i.e. lack of winter, not summer, rainfall vs. hot weather and climate change</li> <li>• EVIDENCE THIS with data – people expect and are now familiar with data during a crisis</li> <li>• ADDRESS LACK OF KNOWLEDGE (and interest) OF WATER USE</li> </ul>	<ul style="list-style-type: none"> <li>• SHOW WHAT 50/80/100 LOOKS LIKE in terms of inside and outside activities</li> <li>• Provide range of EASY 'HOW TO' ACTIONS/ STEPS to save water and overcome restrictions</li> <li>• Ideally INCENTIVIZE HARDER TO REACH AUDIENCES with free toolkit</li> </ul>	<ul style="list-style-type: none"> <li>• Water usage is second nature, it is something people DO NOT THINK ABOUT</li> <li>• NEW HABITS WILL BE EASILY FORGOTTEN UNLESS the messages and tactics are REINFORCED</li> </ul>	<ul style="list-style-type: none"> <li>• In a drought, communication would by necessity ask people to ACTUALLY DEFINITELY DO (OR NOT DO) something</li> <li>• So be DIRECT</li> <li>• Covid style 'Hands, Space, Face' a familiar and established style that could be leveraged again</li> <li>• Information/ action should be BITESIZE</li> <li>• For EU/ BAME NATIVE LANGUAGE MATERIALS will increase involvement</li> </ul>

\*KISS- Keep it Simple and Straightforward

Figure 4 Breakdown of feedback into four key components

## 5 CONCLUSIONS AND SUMMARY OF CHANGES

This section summarises the main changes proposed to be made to the draft Drought Plan and additional key learnings from our public consultation that translate into updates in our final Drought Plan.

### Changes to draft Drought Plan

We divided our response to representations into four categories of change to the text in the current draft Drought Plan, as follows:

- No change to draft Drought Plan: We acknowledge the representation but do not consider a change in the draft Drought Plan is required.
- Minor change to draft Drought Plan: We made a minor change to clarify the issue raised or address the minor amendment noted.
- Provision of further information: We provided further information in response to the representation to support the way in which we propose to manage drought events.
- Major change to draft Drought Plan: As a result of the representation, we made a significant change to our draft drought plan. This may have the potential to affect customers and other plans (e.g. the Water Resources Management Plan).

The categories of changes made to the draft Drought Plan resulting from our consideration of responses are summarised below in Table 3. As a result of the 14 Stakeholder representations, we made 13 minor changes to the draft Drought Plan and on six occasions we provided further information in response to the representations. The majority of the representations did not result in a change to our draft Drought Plan, where the information was clarified in our Statement of Response, already existed in our plan, or additional work was suggested that would span beyond the timeline of publication of the plan (in this case a programme of works was provided).

Table 3 Changes made to the draft Drought Plan resulting from our consideration of responses

Aspect of the Drought Plan	Changes to draft Drought Plan
Habitat Regulation Assessment (HRA)	Included a summary of the WRMP19 HRA assessment findings.
Strategic Environmental Assessment (SEA)	Included a summary of the WRMP19 SEA assessment for our North Arundel Drought Permit findings.
Extreme drought actions	Added options in our revised draft Drought Plan that will need to be explored further with some added detail on what the options would look like and the likely barriers.
Communication plan	Added information to our revised draft Drought Plan to specify the type of engagement we would expect to have with the Environment Agency as we cross our drought trigger levels.  Added details of how we aim to monitor the effectiveness of our communication activities.
Supply side actions	Added information on compensation arrangements.
Bulk supplies	Added clarity on the North Arundel transfer.
Testing our triggers	Provided further information on drought recovery and when restrictions would be lifted in a multi-season drought scenario. Also added a summary of main findings in our main plan.
Environmental drought	We have added wording around supporting other sectors.
Demand side actions	We added further detail on the consultation period.
Drought Actions	Updated our Table 4 on drought actions.
Exemptions	Added more detail on defining vulnerable customers in our Appendix E.
Emergency Drought Actions	Added paragraph to explain that we would liaise with Hampshire County Council as the local highway authority under this scenario.

Additional work and activities we will carry out as a result of the public consultation are as follows:

- Review the exemptions, in combination with other water companies, to ensure ‘fairness’ for all customers and prioritise health and safety examples.
- Carry out further work and provide more information on the potential environmental impact of the North Arundel Drought Permit. Update the Environmental Assessment Report in consultation with the Environment Agency and, where required, Natural England in line with the agreed programme.

- Carry out Habitat Regulation Assessment (HRA) screening and undertake a Strategic Environmental Assessment (SEA) process that include our Drought Plan options, as part of our WRMP24 scope of works.
- Explore further the suggested actions we would take in extreme drought to avoid the need for emergency actions such as rota cuts and standpipes.
- Continue to work with Southern Water on the River Itchen Drought Order project, in line with the agreed programme, to ensure that all outcomes are included in subsequent reviews of the Drought Plan.
- Carry out a Drought Vulnerability Assessment through our WRMP24 programme of works, based on updated stochastic data sets to determine how resilient the Portsmouth Water supply system is to droughts of varying intensity and duration.
- Incorporate lessons learnt into business-as-usual water efficiency activities and preparations for WRMP24.

**Key learnings to translate into updates in our final Drought Plan (mainly for our communications plan) include:**

- Maintain current stages of drought actions and traffic light system, which customers find easy to understand and support.
- Increase focus on supporting water saving in ‘normal times’, particularly engaging businesses and promote wider education on water use, water stress and drought risk.
- Take more early action to mitigate the risk of escalation as drought worsens to encourage pre-emptive action, build trust and social currency among customers, which will in turn encourage compliance with stricter restrictions later down the line.
- Use tailored communication approaches for geographical areas and customer groups – utilising existing community touchpoints, supportive stakeholders and tailored formats.
- Social media is the best channel through which to communicate with young people about drought.
- Clearly visualise what ‘normal’ water use is and what 50-80 litres per day looks and feels like.

## 6 NEXT STEPS

We have published this Statement of Response on our website and a copy has been sent to all individuals and organisations who responded during our consultation period. The document identifies our response to the representations on the draft Drought Plan, changes made to the draft Drought Plan and the reasons for them, or the reasons why no changes are proposed.

Additionally, we have contacted neighbouring water companies and potential stakeholders who did not respond to the consultation informing them of the publication and any key changes to the plan. We have sent a note to stakeholders, retailers and customers involved in our customer research and insight work (if they have consented to being contacted) on the publication of this Statement of Response. Finally, we have issued a news release and social media post as well as notifying Portsmouth Water employees.

A revised draft Drought Plan has also been prepared which highlights the changes we have made as a result of the consultation. This has replaced the draft Drought Plan and is also available on our website. In addition to the changes, we have also identified a number of actions in our revised draft Drought Plan and we will continue to progress these with the Environment Agency and Natural England.

The following steps will now be taken to complete our final Drought Plan:

- Secretary of State will review the Statement of Response and revised draft Drought Plan.



- Direction from Secretary of State whether our Statement of Response and revised draft Drought Plan have been accepted.
- We prepare our draft final Drought Plan based on feedback.
- Environment Agency review our draft final Drought Plan for compliance with Secretary of State directions.
- We publish our final Drought Plan.