2027-33 Corporate Plan
Consultation Respondent Form

Any questions marked with an asterix * are mandatory and we ask that you complete those please.

1. Do our proposed outcomes reflect what matters most for customers and stakeholders? *

The proposed outcomes could be strengthened to recognise firefighting water supply explicitly as a public safety and resilience consideration. Fair charges, accountability for delivery, and effective joint working are appropriate aims, but their practical application should include the infrastructure and services needed to support firefighting.

The final Corporate Plan should therefore explain how firefighting requirements will be reflected within WICS's outcomes concerning charges, performance, investment delivery, and joint working.

2. What should be our highest priority work areas over the 2027–33 period, and why? *

Firefighting performance and service expectations

WICS should prioritise measures and reporting requirements developed with Scottish Water and the Scottish Fire and Rescue Service (SFRS). These should cover flow and pressure constraints, hydrant condition, Scottish Water's delivery of installation, maintenance, and renewal work, notifications, operational support, and working arrangements.

SFRS and NFCC have previously highlighted that Scottish Water's water flow rates are not always sufficient for firefighting. Reporting should help establish where constraints exist, their operational significance, and progress towards remediation or agreed mitigation.

Clear service expectations should also address the timely completion of hydrant works and reliable notification when work is planned and completed. Repair standards should distinguish between critical and routine defects, with appropriate timescales and escalation arrangements. WICS should test whether incentives relating to supply interruptions, pressure management, or leakage could unintentionally delay hydrant maintenance or reduce water availability for firefighting.

Transparent and efficient hydrant charges

SFRS and NFCC have previously highlighted that some traffic management costs passed to SFRS in connection with hydrant works had increased by around 300% over the preceding year. We also raised concerns about the information available to assess subcontractor charges and whether procurement and contract management were securing value for money.

The statutory framework generally requires SFRS to meet the cost of installing, maintaining, and renewing fire hydrants, while Scottish Water is responsible for carrying out that work. SFRS does not dispute its responsibility to meet legitimate hydrant costs; however, this arrangement makes transparent pricing, effective procurement, and appropriate cost control particularly important.

WICS should require Scottish Water to demonstrate transparent, itemised, and efficient charging for hydrant works, including subcontractor and traffic management costs. Its scrutiny should include evidence that subcontracted work is competitively procured and subject to appropriate cost challenge. Charging arrangements should clearly distinguish prescribed hydrant costs from costs arising from inadequate network design or infrastructure.

Investment informed by firefighting requirements

WICS should ensure that SFRS evidence informs relevant network design, asset adoption, renewal, and investment prioritisation.

SFRS's submission to a previous WICS consultation described a development where new pipework was connected to an existing 63 mm main that SFRS considered unsuitable for firefighting supply. Scottish Water sought to recover the cost of replacing the main from SFRS, while the developer had subsequently dissolved. The inadequate supply required SFRS to increase its predetermined attendance to the affected area, committing additional operational resources to compensate for the infrastructure constraint.

This illustrates why firefighting requirements should be considered during infrastructure design and adoption, and why operational mitigation cannot substitute for suitable infrastructure. Investment decisions should reflect risks to life and firefighter safety, high-risk premises, rural and remote communities, wildfire and drought exposure, development growth, and the additional resources required where supplies are inadequate.

Scottish Water and SFRS should maintain a shared understanding of relevant constraints. Where remediation is not reasonably practicable, they should agree mitigations or alternative supply arrangements, with clear responsibility for delivery and associated costs.

Climate and operational resilience

The Corporate Plan should ensure that WICS's scrutiny of resilience planning and investment addresses the availability of water for firefighting.

Drought and extreme heat can constrain water availability at the same time as wildfire and other fire risks increase. Relevant planning should include early warning of emerging supply risks, joint assessment of high-risk locations and periods, consideration of alternative or supplementary supplies, and clear incident liaison and escalation arrangements.

3. Which of our proposed areas of work will have the greatest positive impact, and where should we go further? *

The proposed work on performance monitoring, accessible information, independent verification, and joint consideration of emerging risks provides useful opportunities to address our concerns. These activities will have greater impact if firefighting requirements are explicitly included in their scope.

WICS should require Scottish Water to engage SFRS in developing its investment delivery plan and when material changes are proposed to relevant water continuity, asset maintenance, mains replacement, pressure management, network resilience, or climate adaptation investment.

Delivery plans should identify investment addressing known flow, pressure, mains capacity, hydrant condition, and resilience risks. They should also show, at a high level, whether concerns raised by SFRS have been addressed. Where relevant investment is deferred or reprioritised, the public safety and operational consequences should be assessed and discussed with SFRS.

The Corporate Plan should translate these commitments into identifiable actions in WICS's annual work programmes, with clear responsibilities and timescales. Success measures should demonstrate whether service concerns have been addressed, charges have been scrutinised effectively, and SFRS evidence has influenced relevant decisions.

4. How can we improve how we engage, communicate and involve customers and stakeholders in our work? *

WICS should explicitly recognise SFRS as a key public safety partner in the final Corporate Plan and establish a regular route for its operational evidence to inform regulatory assessment. SFRS's service-level agreement with Scottish Water is substantially out of date, and attempts to update it have not secured the engagement needed to complete a revised arrangement. WICS should require Scottish Water to agree an updated protocol or service-level agreement with SFRS within a defined timescale and to review it periodically.

The agreement should establish clear expectations for routine liaison, information sharing, notifications, hydrant works, operational support, and escalation, and should be reviewed periodically. Its communication provisions would also support recommendation 39 (paragraph 113.63) of the Grenfell Tower Inquiry's Phase 2 report, which the Scottish Government has accepted. That recommendation calls for fire and rescue services to agree protocols with statutory water undertakers for effective communication about firefighting water supplies and to review those protocols periodically.

There should also be a defined route for SFRS to raise emerging or unresolved service and performance concerns directly with WICS, and for that evidence to inform regulatory scrutiny.

Effective engagement should support SFRS's access to current information about hydrants, mains, known flow constraints, and relevant network changes, enabling better operational planning and incident response. We would welcome continued engagement with WICS and Scottish Water to develop practical, measurable arrangements aligned with the statutory framework. NFCC can support this work through wider sector evidence and shared learning, alongside SFRS's direct Scottish operational expertise.

Tell us about you

Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to published. If you ask for your response not to be published, we will still take account of your views in our analysis but we will not publish your response, quote anything that you have said or list your name. We will regard your response as confidential, and we will treat it accordingly.

5. What is your name?

Mark Gosling, NFCC Firefighting Media Lead

6. Are you responding as an individual or an organisation? *

Individual	

Organisation	X

7. What is your organisation?

The National Fire Chiefs Council

8. WICS would like your permission to publish your consultation response. Please indicate your publishing preference. *

Publish response with name	X
Publish response only (without name)	
Do not publish response	

9. Do you consent to WICS contacting you in relation to this consultation exercise? *

Yes	X
No	

10. What is your email address?

[redacted]

11. I have read and understood WICS consultations privacy notice. *

Yes	X
No	

12. I consent to the data I have provided being used as set out in WICS consultation privacy notice. *

Yes	X
No	

Thank you for taking the time to participate in our consultation. Your views are important to us.

Your completed form should be submitted to WICS via email at: enquiries@wics.scot, or via post at the following address:

WICS

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Forthside Way

Stirling

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