



Draft Drought Plan

October 2024



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# Section 1. Introduction

## 1.1. This Drought Plan

This is Leaf Water's first Drought Plan since appointment as a water and sewerage undertaker in April 2024. It considers sites for which we have an appointment or variations to that appointment up to 28 May 2024, all of which are in England only. As we move towards our Final Drought Plan and further variations to our appointments are granted, we will add these to the Final Plan. We will then update our Final Drought Plan with any further variations to our licence annually.

We will publish our draft Drought Plan on our website to facilitate consultation with statutory and non-statutory consultees as well as to seek feedback from our customers. Our statutory consultees are:

- Defra
- Environment Agency
- Ofwat
- Supplying Water Companies

At this stage, we do not plan to apply for variations to our appointment for developments in Wales, so we are currently not needing to consult with Welsh Government or Natural Resources Wales (NRW).

## 1.2. Who We Are

Leaf Water (the trade name of Advanced Water Infrastructure Networks Ltd (AWIN)) is a New Appointment and Variation company (NAV) that provides water and/or sewerage services under a license granted by the Secretary of State for the Department of Environment, Food and Rural Affairs (Defra). As with all NAV companies, AWIN is regulated by the Office of Water Services (Ofwat) through powers delegated to them in 2007. Ofwat ensures that customers are treated fairly and provides protection when the water supply does not meet the agreed standards of service.

Leaf Water was founded in February 2023 as part of the wider Advanced Utility Networks Group. The group consists of four companies; two construction firms, TriConnex and eSmart Networks, which design and construct electricity and water infrastructure assets and have been undertaking this work for over ten years, and two new asset management companies, Advanced Water Infrastructure Networks and Advanced Electrical Networks, established in February 2023 to adopt, own and operate infrastructure assets. The Advanced Utility Networks Group is backed by Fitzwalter Capital Limited, a global private investment firm.

Our first appointment was granted on 17 April 2024 for a NAV area in Lenham, Kent with two additional variations granted on the same day. Subsequent variations have been granted for five more NAV areas making a total of eight AWIN appointments. At the time of the dWRMP submission to the Environment Agency (EA), we have a further 31 applications being assessed by Ofwat. We are not supplying any consumers yet and anticipate our first connection will be in the winter of 2024.

We do not own or operate water sources. All our supplies are through bulk connections from the local incumbent water company. We have negotiated Bulk Supply Agreements (BSAs) with the incumbent water companies for all the sites we supply. These agreements are designed to secure adequate supplies for our customers throughout the 25-year planning period, including sufficient headroom to allow for uncertainties in demand forecasts. Also, the BSA agreed supply volume is an annual average so covers periods of higher and lower demand throughout the year.

Both factors ensure that should there be a drought customers will not be placed at any risk greater than if supplied directly by the incumbent.

We were granted our first appointment on 16 April 2024 for a NAV area in Lenham, Kent. Two variations to this appointment were granted prior to the 28 of May 2024 and we have a number of further applications being considered by Ofwat and these are listed in our dWRMP.

As we grow as a business and become water and sewerage undertakers for more NAV Areas, we will add them to our Drought Plan at as part of our annual review process, in line with statutory requirements.

### **1.3. Our Draft Water Resource Management Plan (dWRMP)**

This plan is our first Drought Plan, and it should be read in conjunction with our dWRMP. It is a tactical plan that contributes to the successful delivery of our WRMP.

The public consultations for both our dWRMP and draft Drought Plan are expected to take place in late 2024. We will publish a statement of response to any comments on our Drought Plan thereafter and in accordance with the required timeframes.

Our Drought Plan and WRMP both contain details of the Levels of Service (LoS) we are committed to in each Supplying Water Company's region and how we collaborate with the Supplying Water Companies to ensure adequate supplies. We also demonstrate in our WRMP how we plan to reduce demand over the 25 years and meet the consumption target of <110 litres per head per day across our developments by 2050. This includes minimising leakage, encouraging our customers to be water efficient and the use of AMI smart meter data.

We also explain in our WRMP our intention to collaborate regionally. There are five regional groups across England and Wales and we, as part of the Independent Networks Association

(INA), which represents NAV companies, are engaged with these groups. Going forward this will enable us to understand the water resource planning in each region and be included in the discussion about demand management.

We have engaged with the nine Supplying Water Companies where we have made NAV applications within their geographic region and have meetings their NAV teams as necessary. During our pre-consultation we have proposed and agreed to extend this engagement to specifically cover the topics of Water Resource Management and Drought Planning in regular quarterly meetings with each of the Supplying Water Companies. These NAV Areas commence live operations, so as to ensure all possible measures are being implemented to make sufficient water supplies available to us for our customers. These quarterly meetings with our three Supplying Water Companies are diarised to commence in January 2025.



**Figure 1.1: Regional Water Resource Groups.**

## Section 2. What is Drought?

A drought can be defined as a prolonged period of abnormally low rainfall, leading to a shortage of water. These shortages can affect the supply of water in a Water Resource Zone (WRZ) of the Supplying Water Companies. All water companies are required to have a plan for dealing with drought risk and consider drought scenarios so as to have an understanding of what they will do as a drought approaches and occurs. Drought scenarios are modelled by each Supplying Water Company, and we have considered the likelihood of these drought scenarios occurring in each of our NAV Areas using the predictions made by the Supplying Water Companies for each WRZ where we take a water supply from, as set out in our dWRMP.

The Supplying Water Companies will monitor various indicators of water availability, which include:

- rainfall levels
- river flows and levels
- groundwater levels
- reservoir stocks
- deterioration in raw water quality
- levels of network leakage
- consumer consumption

Whilst, a drought can be caused by a shortage of rainfall, it can be exacerbated by high temperatures leading to a loss of water from the ground due to evaporation and transpiration processes. The impact of the lack of rainfall (and high temperatures) can lead to reduced flows in rivers, lower lake and reservoir levels and lower water levels in underground aquifers.

If these conditions persist for several consecutive months, additional pressure is placed on water sources. The quality of the source water can, in some circumstances, deteriorate, with reduced dilution of contaminants and the growth of algae, both of which can reduce the output from water treatment works. Also increased demand for water by our customers in response to dry and/or hot weather conditions can increase the pressure on water sources. If the dry weather continues, the available water resources to feed the public water supply system can remain depleted even if it starts raining again.

As a NAV, we work closely with the Supplying Water Companies for our NAV Areas and have proposed a set of triggers and actions, which are summarised in later sections of this Drought Plan. These triggers and actions can be very different depending on where our NAV Area is in the country and which WRZ our bulk supply comes from.

This is because each WRZ can have different drought conditions, and so the approach to mitigate the impacts of a drought will vary according to those conditions and the approach of the Supplying Water Company as set out in its own Drought Plan. A WRZ is established by a water company as an area which is served by a common water source. There may be

occasions where we implement our own measures on our WRZs in support of our customers in a drought situation. The variations across the different Supplying Water Companies are set out in Appendix 1 of this Drought Plan.

Further details on droughts can be found on the Environment Agency's website: [www.gov.uk/government/publications/drought-managing-water-supply/drought-how-water-companies-plan-for-dry-weather-and-drought](https://www.gov.uk/government/publications/drought-managing-water-supply/drought-how-water-companies-plan-for-dry-weather-and-drought).

## **2.1. Testing Our Drought Plan**

To ensure we have developed a robust Drought Plan it is important that it is tested and validated. As we currently have no live operational sites, we have not had to actively participate in a drought event. It is our intention to undertake a readiness exercise in the spring of 2025, in preparation for any potential emerging drought scenario during the summer of 2025. This readiness exercise will include simulated communications with a Supplying Water Company, internal communications within Leaf Water, preparing both social media and traditional media articles and announcements for a Level 1 event. Should a Level 1 event occur then this will trigger a similar readiness exercise for Level 2. The outcomes of any readiness exercise will be used to inform and enhance our existing plans with the lessons learned.

As part of our proposed quarterly meetings with Supplying Water Companies we will suggest we undertake a joint event to validate the respective Drought Plans and the triggers and actions within them. We currently have regular meetings with most Supplying Water Companies where water resources and drought plan updates and considerations are shared.



## Section 3. What We Will Do in a Drought

This section summarises our general approach to managing drought events. We have set out the specific responses for each of our NAV Areas within Appendix 1 of this plan.

### 3.1. Our Levels of Service (LoS)

As we receive a supply of water from a Supplying Water Company, rather than our own water sources, our LoS, and what we will do for our customers in a drought, will match the LoS and actions of the Supplying Water Company. We have five Levels of Service as shown in Figure 3.1 below. Drought will progress from Level 0 up to a level where it stabilizes and then begins recovery. Recovery from drought can commence at any level.



**Figure 3.1: Leaf Water Levels of Service**

Each level is triggered by an action or communication from either Defra or the Supplying Water Company. Each Bulk Supply Agreement (BSA) has clauses relating to our response to an emerging drought situation. The triggers and levels are introduced in Table 3.1 below and the following sections explains them in more detail.

We will work closely with the Supplying Water Company as a drought develops to ensure that communication to all affected parties is aligned and that those parties have a clear

understanding of the situation and understand the measures required to protect both their water supplies and the environment. The key actions to be taken at each of the five identified service levels are set out below with the management actions and communication strategy also included.

An essential part of the drought management process is to ensure that all stakeholders are aware of a developing drought and that they are a part of the decision-making process before any drought actions are implemented. We are committed to ensuring that communications with our customers will closely mirror those of our Supplying Water Company and that our actions are also aligned. We will collaborate with our Supplying Water Company to ensure that our messages are consistent and accurate, and we will be clear as to what we are asking our customers to do. A key consideration is that a drought developing in different areas at different times will require communication to be tuned to each area.

Our Level of Service	Trigger	Event Owner	Possible Drought Measures by Us
Level 0 (BAU – No Drought)	No drought event foreseen, in progress, or in recovery. Communication between Supplying Water Company and Leaf Water is not highlighting any potential issues and it is Business as Usual.	Leaf Water Senior Management	Annual Level 1 Drought Event Readiness Check
Level 1 (Developing Drought)	Communication between Defra, Supplying Water Company and Leaf Water about potential water shortages.	Leaf Water Senior Management	Media campaign for water efficiency or targeted customer water efficiency campaign and enhanced advice on our website. Level 2 Readiness Check
Level 2 (Temporary Use Ban - TUB)	Communication by Supplying Water Company that they have reached their trigger level for a Temporary Use Ban (TUB).	Leaf Water Managing Director	Notify and implement a Temporary Use Ban in the relevant area. Level 3 Readiness Check
Level 3 Non-Essential Use Ban - NEUB)	Communication by Supplying Water Company that they have reached their trigger level for a Drought Order and/or Extreme Drought Management Actions.	Leaf Water Managing Director	Issue an Ordinary Drought Order to Restrict Water Use (Non-essential use ban) Level 4 Readiness Check
Level 4 (Emergency Response)	Communication by incumbent water company that they have reached their trigger level for an Emergency Drought Order.	Leaf Water Managing Director	Activate Leaf Water emergency procedures regarding drought events. Issue an Emergency Drought Order

Recovery from Drought	Communication by Supplying Water Company that they have reached their trigger level for a Return to Normal Services (this can occur after any stage).	Leaf Water Senior Leadership Team	Media/Digital Campaign notifying the lifting any orders. Website updated to reflect recovery from drought. Media/digital Campaign highlighting the benefits of continued water efficiency
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**Table 3.1: Our Levels of Service**

### 3.2. Our Stakeholders

During any stage of drought, all stakeholders and customers need to be made aware of the water supply situation. We should be clear on the part they can play in managing the drought conditions and protecting the environment, whilst ensuring the on-going security of water supply. Specific stakeholders are identified below and details as to how and when communication will take place during a drought event is included in the later sections about each level:

- **Supplying Water Companies** – As we obtain our water supply from another water company, the communication channels between us and the Supplying Water Company are important, and they are set out in the Bulk Supply Agreement for the water supply. Regular communication ensures that any situation which could impact both companies is proactively managed in a coordinated manner. We have regular meetings with the Supplying Water Companies to ensure we are prepared for any changes in the drought situation. The meeting frequency increases as triggers are met and the drought level increases.

We have developed and shared our proposed frequency of liaison with the Supplying Water Companies, and these align with our management strategy for drought events and are as set out in Table 3.2 below.

Service Level	Frequency
Level 0 – Business as Usual	Quarterly
Level 1 – Developing Drought	Quarterly
Level 2 - TUB	Monthly
Level 3 - NEUB	Weekly
Level 4 – Emergency Response	Daily

**Table 3.2 – Minimum Liaison Frequency**

- **Government, Regulatory and Other Parties** – Timely communication with Government, regulatory bodies (including Defra, Environment Agency and Ofwat) and the Consumer Council for Water is an essential component of drought communications and drought management. We will maintain a single point of contact within Leaf Water for these communications. We have regular quarterly meetings with these stakeholders, and these include Water Resource Management and Drought Planning considerations.
- **Customer Communications** – Drought communications with our customers is our responsibility and we will build on our existing communication channels and customer

water efficiency promotion activities. Special consideration will be given to any vulnerable consumers on our Priority Services Register (PSR).

- **Media Communications** – Media communications relating to drought conditions and management measures will be carefully coordinated with the Supplying Water Company, the Environment Agency, and the Consumer Council for Water (CCW) to ensure there is no confusion in the public message.
- **Staff** – Our staff will be trained in the content of this Drought Plan and will be kept informed should a drought event occur.

### **3.3. Fire Service**

Water companies have duties under Part 5 of the 2004 Fire and Rescue Services Act regarding the provision of water for firefighting. During minor and moderate droughts (i.e., those requiring Level 1, 2 or 3 drought actions to be implemented) we would never place restrictions on the use of water for firefighting. However, during unprecedented extreme droughts, the most severe of our Drought Plan actions is to reduce pressure within our network. This could affect the flow rate from hydrants used by the Fire Service for firefighting. Nevertheless, we would take all reasonable measures to provide adequate supplies of water for the Fire Service's use in firefighting. In the very unlikely event that network pressure reduction was required we would provide the Fire Service with as much warning as possible (a minimum of 7 days) and we would formally notify the relevant Emergency Planning Authorities.

### **3.4. Industry Reports**

#### **3.4.1 UKWIR**

UK Water Industry Research (UKWIR) publishes various documents to support water companies in managing drought. They published a Code of Practice and guidance for water companies on water use restrictions in 2023, which is an update to the work in 2013, the 2023 document is available through this link [Update to the Drought Code of Practice 2023](#).

This document includes principles and actions to follow when companies are evaluating whether and how water use restrictions will be implemented in their areas in times of drought. These are summarised below:

#### **Principles**

- Ensure a consistent and transparent approach
- Ensure the water use restrictions are proportionate
- Communicate clearly with customers and the wider public and users

- Consider representations in a fair way

**Actions:**

- Companies, regulators, and government to work together
- Coordinate communications
- Adopt a common phased approach, considering socio-economic factors
- Adopt a common approach to exceptions
- Promote understanding and good practice

In developing our first Drought Plan we have followed the guidance in this publication.

### **3.4.2 CWW**

With regards to the Consumer Council for Water (CCW) they provide support to customers on water saving and what to do if there are drought restrictions. They also published a document in 2013, “Understanding drought and resilience” to help water companies understand customer attitudes and perceptions of drought and is available through this link [Consumer Council for Water - Understanding drought and resilience - May 2013 - CCW](#).

When deciding on new customer messaging, we will ensure we refer to the guidance from CCW. More information is available on their website through this link [Drought - CCW](#).

Both the UKWIR reports and CCW information were used to develop our communication material and our communication plan. The guidance also helped us to develop our plans for our Senior Leadership Team and ensure this Drought Plan is a practical, implementable plan.

### **3.5. Level 0 – Business as Usual (BAU) – No Drought**

Level 0 is Business as Usual and there is no developing drought, increased drought risk, drought event occurring or drought recovery taking place.

We will undertake an annual Drought Readiness Check, usually in the spring of each year to ensure we are prepared for the possibility of a drought event in the summer.

We will promote our usual activities regarding water efficiency, which includes our water saving advice on the website, information with our water bills and information within our welcome pack. We will also promote water saving devices.

Our BAU leakage activities include reviewing consumption from our meters, reviewing logger data, providing advice to our consumers on spotting leaks, and site inspections to ensure the quality of installation of our pipework. At Level 0 we will encourage customers to tell us about leaks and we will also provide leakage advice with our water bills.

Level 0 is managed by a nominated member of the Leaf Water Senior Leadership Team and communication with all our five stakeholder groups will continue as usual. This will include our message to customers encouraging conservation of water as a precious resource. Table 3.3 summarises this level below:

<b>Level 0</b>	
What is Level 0?	No Drought
What is the trigger?	BAU – no other drought level or drought recovery in place.
Who is responsible?	Senior Manager
What actions will we take?	Meetings with stakeholders Annual Level 1 Drought Event Readiness Check
What is the notification process?	No notifications required.
What does it mean to you?	Please continue to conserve water and minimise waste.

**Table 3.3: Level 0 Actions**

### **3.6. Level 1 – Developing Drought**

Level 1 is a developing drought or increased drought risk. Should we reach this trigger, we will commence discussions with the relevant Supplying Water Company and Defra. A media/direct communication campaign with customers will be initiated to further encourage conservation of water, by following some water-saving suggestions. Advice will be on our website through this link [Leaf Water](#)

In some cases, where we already know at Level 0 that this trigger is likely to be reached, we will plan pre-emptive campaigns to engage with customers and stakeholders as early as possible. We will promote water efficiency and water conservation, which will include water saving tips on our website, advice with our water bills and information within our welcome pack. We will also promote water saving devices.

Our BAU leakage activities include reviewing consumption from our meters, reviewing logger data, providing advice to our consumers on spotting leaks, and site inspections to ensure the quality of installation of our pipework will continue. At Level 1 we will increase our campaigns to encourage customers to tell us about leaks and provide leakage information with our water bills. We will seek to fix leaks sooner and provide additional support to customers in repairing supply pipe leaks. We will also target our site inspections to increase the frequency in regions of Level 1 droughts.



As a drought develops, we will also increase our promotion of the need for consumers to conserve water including suggesting the use of water efficiency devices such as leaky loo strips and shower timers. This is in line with our WRMP. We will also consider implementing other demand management measures such as targeting high users of water or NHH properties that have a history of high demand and also engaging with developers regarding reducing their onsite consumption where possible. There may also be ground maintenance activities on developments that could be temporarily modified to save water through engagement with the management company.

This level will be managed by a nominated member of the Leaf Water Senior Leadership Team and Level 1 communication with all our five stakeholder groups will be initiated. This will include enhanced messaging about water conservation. We will utilise wider communication channels and digital media, to enhance our messages and encourage customers to visit our website. Drought information will be available on our website highlighting the environmental impact of water use on the WRZ of the affected water source, water saving ideas and to provide the opportunity for customer feedback. Our aim will be to encourage customers to voluntarily limit their non-essential uses of water, with tips and ideas provided by us to help them reduce their water consumption. Table 3.4 summarises this level below:

<b>Level 1</b>	
What is Level 1?	Developing Drought
What is the trigger?	Notified by the Supplying Water Company or Defra of a likely water shortage.
Who is responsible?	Leaf Water Senior Leadership Team
What actions will we take?	Increase our media campaign and information for customers about saving water and spotting leaks. Increased monitoring of supply and demand to identify leakage, more site visits and, if found, fix leaks more quickly. Consider additional demand management measures.  We will undertake a Readiness Check for Level 2
What is the notification process?	We will send information to customers about saving water and encourage the fitting of water saving devices.
What does it mean to you?	Please help us to save water in this time of water scarcity.

**Table 3.4: Level 1 Actions**

### **3.7. Level 2: Temporary Use Bans (TUB)**

Level 2 is the point at which the Supplying Water Company formally advises us that it is intending to put a TUB in place. We will continue with our Level 1 actions, and we will scale up our customer campaigns appropriately as dry weather takes hold. We will initiate preparations for drawing up public notices relating to the issuing of a TUB. The specific actions could vary depending on the Supplying Water Company we are working with, and we will align accordingly.

It remains important that we monitor leakage and keep our leakage to a minimum, we will build on our monitoring from the previous level. This will include more regular reviews of supply and demand data and more targeted site inspections. We will aim to fix any identified leaks quickly.

#### **3.7.1 What is a TUB?**

Formerly known as a Hosepipe Ban, a TUB permits water companies to enforce a range of restrictions and is enabled by the Flood and Water Management Act 2010. A TUB will only be implemented following a customer consultation period. Our consultation date for any affected WRZ will match that of the Supplying Water Company to ensure consistency of approach and the consultation period will usually also be aligned with that of the Supplying Water Company and will allow customers sufficient time to make representations. A TUB is likely to cover restrictions on the following activities:

- Cleaning a private leisure boat using a hosepipe
- Cleaning a private motor vehicle using a hosepipe
- Filling or maintaining an ornamental fountain
- Cleaning walls, or windows, of domestic premises using a hosepipe
- Cleaning paths or patios using a hosepipe
- Cleaning other artificial outdoor surfaces using a hosepipe
- Drawing water using a hosepipe, for domestic recreational use
- Filling or maintaining a domestic swimming or paddling pool and hot tubs
- Watering a garden using a hosepipe
- Watering plants on domestic or non-commercial premises using a hosepipe
- Filling or maintaining a domestic pond using a hosepipe

This level will be led by the Leaf Water Managing Director and communication with all our five stakeholder groups will continue, building on the meetings already set up whilst in Level 1. A Drought Event Management and Operations Team will also be formed, which is described further in Section 4.1.

Communication between stakeholders will become more frequent if the drought intensifies. Communications will be regular and timely to enable feedback and discussion prior to any

final decisions being made. We will also undertake a Readiness Check for Level 3 and initiate appropriate preparation during this stage should it look likely that this will be required.

Once Level 2 is reached and a decision is taken to consult on a TUB, we will provide our customers with details of the proposed water use restrictions and explain what exemptions and concessions would be made (for example, for vulnerable customers and registered disabled customers) in accordance with the regulations and best- practice guidance. This information will also include the process for customers to make any representations.

Similar messages and consultation will also be provided to customers and site management companies should the trigger for Level 3 be reached and further restrictions be required.

If a TUB is implemented, we will ensure that details of the restrictions, exemptions and concessions are clearly provided to our customers via our website and direct contact. We will also explain our decisions in relation to the water uses we are prohibiting, the exemptions and concessions we have made, as well as our response to any representations at the consultation stage. We will provide details of the telephone number for customers to contact us with any questions or concerns.

### **3.7.2 What is the Process for Issuing a TUB?**

Before proceeding with a TUB, we must be satisfied that our supply system “is experiencing, or may experience, a serious shortage of water for distribution” in accordance with the legislation. We will work with the Supplying Water Company and other relevant bodies in England to review the drought situation; we will assess the water saving benefits of a TUB relative to any benefits already achieved through requests made to customers at Level 1 when they were asked to maximise water conservation efforts.

In line with legislation and best-practice guidance and, in tandem with the Supplying Water Company, we will publicly announce our intention to introduce a TUB and provide customers and stakeholders with a 2 or 3-week period for making any representations on the uses of water that are proposed to be included in the ban and also our proposed exemptions and concessions. Details on how representations may be made will be included in the formal legal notice that will be published on our website (as well as being advertised in local newspapers, as required by legislation). In our discussions with the Supplying Water Company, we will consider all representations that we have received to ensure a consistency of approach to our responses as far as is possible.

If we have more than one NAV area within a Supplying Water Company’s WRZ that has issued a TUB, we will only issue one TUB ourselves and this will list all the NAV Areas that it covers.

Any additional exemptions or concessions will be dealt with in accordance with the UKWIR Code of Practice and Guidance on Water Use Restrictions (2013) and we will follow the four principles outlined in this Code of Practice.

We will consider all representations fairly and equally, assessing the impact on demand and equitable treatment with other similar classes of customer or business. We will clearly set out our response in writing to each representation made.

Following the consultation and representation period, we will make any agreed changes to exemptions and concessions before implementing the TUB. We will support the introduction of the TUB with continued customer communications.

The TUB will be lifted in tandem with the relevant Supplying Water Company when water resources have recovered sufficiently. We will follow the statutory process as outlined in the Water Industry Act 1991. Table 3.5 below summarises this level:

<b>Level 2</b>	
What is Level 2?	Temporary Use Bans (TUB)
What is the trigger?	Notified by the Supplying Water Company that they have reached their trigger level to issue a TUB.
Who is responsible	Leaf Water Managing Director
What actions will we take?	We will firstly consult with customers and then write to them to say that we need to issue a TUB. We will also advertise our intentions in at least two relevant local newspapers and review any representations made.  We will undertake a Readiness Check for Level 3.
What is the notification process?	This will be by letter at least two weeks before the TUB is issued. Customers can ask us questions and apply for an exemption if they meet the criteria.
What does it mean to you?	Whilst a TUB is in place you should not use a hose pipe.

**Table 3.5: Level 2 Actions**

### **3.8. Level 3 – Non-Essential Use Ban (NEUB)**

Level 3 is the point at which the Supplying Water Company formally advises us that it is intending to implement a NEUB. We will continue with our Level 1 & 2 actions and we will further scale up our media campaign and customer communications as the dry spell continues. Increased communication with stakeholders including MOSL, CCW, Ofwat, EA and Defra will also take place.

### 3.8.1 What is a NEUB?

A NEUB would be implemented under the Drought Direction 2011 and sets out to further restrict consumption in a worsening drought event. The primary effect of a NEUB is to extend the TUB restrictions to activities in the business sector. As with the TUB there are some exceptions, such as filling of public swimming pools. The NEUB will therefore have no additional direct impact on residential customers. We will still issue a NEUB to areas with only residential customers, as we believe that this would align with the Supplying Water Company's messages and minimise any potential confusion.

### 3.8.2 What is the Process for Issuing a NEUB?

We will review customer records to identify any non-household (NHH) customers whose business or activity may be affected by the implementation of a NEUB, and we will review customers who are identified as sensitive customers, to ensure that these customers are kept informed and are provided with adequate services. A sensitive customer has been categorised by MOSL (NHH market regulator) as described below:

- **Category 1** - Premises where closure would be logistically impossible: e.g. hospitals and prisons. Site Specific Arrangements (SSA) to establish pre- arranged requirements including provision of dedicated tankers or on-site bottled water hubs.
- **Category 2** - Premises where interruption to supply could result in risk to life. e.g. care homes, hospices, nursing homes, sheltered housing. Less comprehensive version of SSA (SSA lite) to establish service depending on the quantity of water required.
- **Category 3** - Premises where interruption to supply could impact on economy: e.g. education establishments, CNI sites, medical facilities (non-emergency), critical businesses. Consideration given to establishing SSA or SSA lite. Location of alternative water supplies would depend on local feasibility.
- **Category 4** - Premises where interruption to supply could impact on animal health: e.g. farms with livestock, zoos, vets, kennels etc. Consideration to be given to use of non-potable water sources for animal welfare.

An application will be made to the Secretary of State for an ordinary drought order as set out in the relevant legislation to allow us to introduce a NEUB as appropriate. We will engage with businesses and their respective retailer to help them conserve water. Where we need to apply for an ordinary drought order, we will base our application on the Supplying Water Company's affected WRZ, such that all our NHH properties within that affected area will be included in the application.

If we have more than one NAV Area in a Supplying Water Company's WRZ that is issuing a NEUB, we will only issue one NEUB ourselves and this will list all the Leaf Water NAV Areas that the NEUB covers.

This level will be led by the Leaf Water Managing Director and communication with all our five stakeholder groups will continue, building on the meetings already set up whilst in Levels 1 & 2. The Drought Event Management and Operations Team will continue to meet, which is described further in Section 4.0.

We will follow up our customer communications with proactive telephone calls or face-to-face meetings with our all our NHH customers as well as liaising with their retailer. Upon being granted an ordinary drought order to further restrict non-essential water use, we will extend communication of the NEUB to our domestic customers to raise awareness of the worsening drought conditions and the need to continue to conserve water.

At Level 3, the Supplying Water Company may begin to introduce pressure management measures, where the pressure in the water mains may be reduced to decrease any water loss through leakage. These measures could avoid or delay the need to move to Level 4 and we will work with the Supplying Water Company closely to ensure supplies are maintained to our customers. Table 3.6 below summarises this level:

<b>Level 3</b>	
What is Level 3?	Non-essential use bans (NEUB)
What is the trigger?	Notified by the Incumbent that they have reached their trigger level to issue a NEUB.
Who is responsible?	Leaf Water Managing Director
What actions will we take?	We will firstly consult with business (NHH) customers and their Retailer and then apply for an Ordinary Drought order as we need to issue a NEUB. Due regard will be taken for any sensitive customers.
What is the notification process?	This will be by letter at least two weeks before it is issued.
What does it mean to you?	Whilst a NEUB is in place certain business customers should not use water unless for essential use.

**Table 3.6: Level 3 Actions**

### 3.9. Level 4 – Emergency Response

Level 4 is the point at which the Supplying Water Company formally advises us that it is intending to implement an Emergency Drought Order. We will continue with our earlier actions at Levels 1, 2 and 3 and customer engagement will be at its peak during this period of severe drought. There will be frequent communication with all stakeholders. Our vulnerable customers and groups will be given additional support.

#### 3.9.1 What Types of Emergency Drought Order Measures are There?

In situations where severe and continuing drought results in a Level 4 Emergency Drought Order, further actions may be required to conserve supplies. The likelihood of these actions being necessary is very low. The actions we will consider are the introduction of rota cuts, the use of standpipes and the introduction of pressure management on our network. A brief description of these options follows.

- **Rota Cuts** – The introduction of rota cuts is when a water company physically restricts the water supply within their networks on a rotating basis. Water supplies will be available in the normal way but only for fixed periods. These periods will be communicated in notifications to customers.
- **Standpipes** – The introduction of standpipes is where the networks are configured such that supplies will only be available for collection from certain standpipe locations. These locations will be communicated in notifications to customers and will be advised in advance. Assistance will be given to those less able to collect supplies themselves.
- **Pressure Management** – Is often used by companies in the normal course of their daily activities, generally to reduce leakage. Further pressure reductions may be used to reduce leakage and conserve water.

We will prioritise the optimisation of pressure management within our network, as this would be expected to reduce the likelihood of the need for an emergency drought order for Rota Cuts or Standpipes during a Level 4 event.

If a Drought event reaches Level 4 then there is a Force Majeure clause in the bulk supply contracts between Leaf Water and the Supplying Water Company whereby water supplies may be limited. This means we must have alternative arrangements to maintain customer supplies. This will only be the case when all actions have been taken under service Levels 1 to 4. This level will be managed by the Leaf Water Managing Director and Leaf Water Senior Leadership Team and communication with all our five stakeholder groups will continue as described earlier. Table 3.7 below summarises this level:

Level 4	
What is Level 4?	Emergency Response
What is the trigger?	Notified by the Supplying Water Company that they have reached their trigger level for an emergency response.
Who is responsible?	Leaf Water Managing Director
What actions will we take?	We will communicate with all our customers and explain our emergency response for rota cuts or the use of standpipes.
What is the notification process?	This will be by letter at least two weeks before an Emergency Drought Order is issued.
What does it mean to you?	Customers will need to follow the advice given in this emergency situation.

**Table 3.7: Level 4 Actions**



## Section 4. Drought Management Structure

### 4.1. Drought Event Management and Operations Team

To ensure security of supply to our customers, we operate an Emergency Response Plan which covers emergency situations. In the event of an impending drought, we will work with the Supplying Water Company to ensure a coordinated response to protect both customers and the environment as detailed further below.

We will also co-ordinate our activities with the Environment Agency and keep Defra, Ofwat, the Drinking Water Inspectorate (DWI) and the Consumer Council for Water (CCW) informed of our drought management measures.

A Drought Event Management and Operations Team (DEMOT) will be convened to help manage the drought actions at Levels 2, 3 and 4 as shown above. The responsible person for convening the DEMOT is the Leaf Water Managing Director. The main activities of the DEMOT for Levels 2 to 4 are set out below.

The DEMOT will consist of all or some of the following people as detailed by the level reached and will be attended by other subject matter experts as deemed necessary by the Leaf Water Managing Director and according to the specifics of the drought event:

- **Leaf Water Managing Director** – responsible for convening the DEMOT if the triggers for Level 2 are reached. This includes implementing the action plan for issuing a TUB, ensuring liaison with the Supplying Water Company and other stakeholders is taking place and ensuring clear and transparent messaging for our customers. They will then chair the DEMOT if Level 3 or 4 is reached.
- **Leaf Water Head of Water Operations** – responsible for the operation of the water network and will therefore ensure actions from the DEMOT are implemented as planned. This is relevant for all levels of Drought and Recovery from Drought.
- **Leaf Water Regulation Manager** – responsible for liaison with our regulators and with the Supplying Water Companies and ensuring Leaf Water meets the obligations of the regulations at all times at each drought event level. This role will provide guidance to the DEMOT referring to industry best practice. This role is also responsible for managing the activities associated with recovery from drought.
- **Leaf Water Head of Commercial** – responsible for customer and staff engagement. They will manage the relationship with our 3rd party customer service provider and will ensure they are undertaking appropriate training to their team and providing consistent messages to our customers. This role will also prepare and manage the Communications Plan at each drought event level. If newspaper articles are required, they will prepare

these and will also liaise with our social media co-ordinator and facilitate the preparation and sign-off of any articles. They will also ensure our website is kept up to date. In the event of a NEUB (Level 3), they will be responsible for liaison with the NHH customers that we have. This role is also responsible for managing the activities associated with recovery from drought.

- **Leaf Water Water Quality Manager** – will support the wider teams in customer services on messaging and ensure drinking water quality is maintained throughout any drought at all levels.
- **Leaf Water Senior Leadership Team (Level 3 and 4 only)** – will support the management of the DEMOT and the action plans if Level 3 or 4 is reached. The Leaf Water Managing Director will chair the DEMOT with the Finance Director also in attendance. Regular communication with Leaf Water staff will also take place.

#### **4.1.1 DEMOT Activities**

As mentioned in Section 3.4 a Communication Plan will be prepared and developed in collaboration with the Supplying Water Company according to the trigger reached. The DEMOT will meet at least monthly if any Supplying Water Company has a drought event at Level 2, weekly at Level 3 and daily at Level 4 and these meetings will be mirrored with subsequent liaison meetings with the Supplying Water Company at the same frequency. Where appropriate the Supplying Water Company may be invited to attend part of the DEMOT meeting to ensure all issues are addressed in a timely manner. Liaison with the Supplying Water Companies at Level 0 or Level 1 will be undertaken quarterly by the nominated Point of Contact and any relevant issues summarised and briefed to the DEMOT if needed.

#### **4.2. Drought Escalation and Resources**

Leaf Water activities are an integrated part of the Advanced Utility Network Group and Self Lay sister company. The wider group has a broad range of utility and water expertise. This allows Leaf Water to draw upon experienced staff with deep and extensive experience of dealing with for example, incidents, consumers, and emergency escalations. Should a drought situation escalate such that more than one Supplying Water Company reaches their drought triggers then the DEMOT will meet more regularly, potentially dedicating meetings to each Supplying Water Company. The DEMOT may be supplemented by additional people from the wider business if additional capacity is needed. This will be coordinated by the Leaf Water Managing Director.

Our self-lay teams are very experienced in dealing with managing operational events and consequently they will be well placed to step in and support these activities.

#### 4.3. Monitoring the Effectiveness of Our Communications and the Implementation of Our Drought Plan.

We will monitor the performance of our drought communications to inform any necessary adjustments to our communications strategy. This will include the following activities, which will be triggered at the level indicated in the Table 4.1.

Measure	L1	L2	L3	L4	Notes
Proactive contact of a sample of our customers by telephone as an event escalates		✓			For NAV Areas where a TUB has been issued
Conducting a sample survey by email of our customers to gather feedback on the effectiveness of our communications in relation to the specific drought management measures being communicated		✓	✓		For NAV Areas where a TUB has been issued. For NAV Areas with NHH customers who are affected by a NEUB.
Reviewing the data from the customer surveys and the customer feedback to determine whether modifications to our communications approach is required		✓	✓		Modifications to the communications approach as identified
Review the impact of drought focused responses to social media comments from customers	✓	✓	✓	✓	Modifications to the approach to responses as identified
Review the impact of direct communications with high volume customers	✓	✓	✓	✓	AMI meter data. Modifications to communications as identified
Monitoring consumption and correlating this to our communications to assess effectiveness		✓	✓	✓	Modifications to communications as identified
Impact of monitoring of leakage and unaccounted for water more frequently			✓	✓	Modify frequency of monitoring as necessary

Reviewing the effectiveness of the availability of bulk meter data from the Supplying Water Company			✓	✓	Engage with Supplying Water Companies with results
Maintaining dialogue with the Supplying Water Company on its communications activities and their assessment of its effectiveness, and vice versa, so that any findings are shared.	✓	✓	✓	✓	Share communication lessons and maintain close alignment of messaging
Evaluating the cost of introducing certain measures.		✓	✓		The impact of the TUB and NEUB will be assessed.

**Table 4.1: Effectiveness Measures**

Monitoring the effectiveness of our communications and operations will also be a standing agenda item on our DEMOTs as will tracking the activities set out in Table 4.1.

The outcomes from the monitoring will inform our approach to communications and operations for the ongoing drought as well as any future droughts and will provide important information for consideration in our post-drought review.

## Section 5. Relevant Legislation

### 5.1. Relevant Stakeholders and Legislation

Leaf Water is a statutory water and sewerage undertaker for appointed areas in England. The relevant consultees regarding applications for drought actions will be Defra and the Environment Agency. We also consult with all the Supplying Water Companies for our NAV Areas along with other regulators and stakeholders as required by legislation.

The Water Industry Act 1991 (as amended), Section 39B & 39C, the Drought Plan Regulations 2005 and the Drought Plan Direction 2020 form the primary basis of the preparation and implementation of this plan. How we meet this direction is included in Section 7.3 (Appendix 3).

### 5.2. Codes of Practice and Compensation

Our published Customer Codes of Practice sets out our commitment to customers and may be found at [Policies - Leaf Water](#). If there were to be a Level 4 situation which resulted in water supplies to customers being cut off, we guarantee to make a payment equivalent to the Supplying Water Company's commitment to each customer for each day, or part of each day, that they are without water. The maximum compensation we will pay out is equal to the average household bill for the NAV Area for the previous year. Any business customer can expect at least the equivalent per day that would be offered by the Supplying Water Company. The maximum total payment is the amount of water charges payable by the customer for the premises for the previous charging year.

### 5.3. Legislation Relating to TUBs

The legislation relating to a TUB is set out in Section 36 of the Flood and Water Management Act 2010. This replaces Section 76 of the Water Industry Act 1991, which only allowed water companies to prohibit or restrict the use of hosepipes (or similar apparatus) for the purposes of watering private gardens and the washing of private motor cars (usually known as a hosepipe ban). The legislation gives water companies further powers to restrict water use by customers through what is commonly referred to as a TUB. The Act is accompanied by the Water Use (Temporary Bans) Order 2010, which sets out in more detail the types of water use that can be restricted and the processes to be followed in implementing the ban.

The legislation provides for water companies to apply exemptions or concessions to a TUB for certain reasons or groups of customers. In relation to the water uses identified above, we would provide automatic exemptions for reasons of health and safety and for registered disabled customers (i.e. those holding a Blue Badge). We would also exempt any vulnerable

customers registered on our support tariff and any businesses directly affected in conjunction with our Code of Practice.

#### **5.4. Legislation Relating to Ordinary (NEUBs) and Emergency Drought Orders**

The Water Resources Act 1991, as amended by the Environment Act 1995 and the Water Act 2003, allows for three legislative ways for dealing with drought situations: drought permits, Ordinary Drought Orders and Emergency Drought Orders. Leaf Water does not have its own water sources and, therefore, will not make an application for a drought permit.

An ordinary drought order is required to implement a NEUB, which attempts to further restrict consumption in a worsening drought event. It is necessary to make an application to the Secretary of State in England for an Ordinary Drought Order following the guidance set by the Environment Agency – drought permits, and drought orders published in March 2021. The application can be for a duration of up to 6 months.

An Emergency Drought Order, also covered by the legislation is required for emergency measures at Level 4 and this can be applied for a duration of up to 3 months.

#### **5.5. Strategic Environmental Assessment (SEA)**

An SEA is designed to:

- Identify potentially significant environmental effects of the Drought Plan;
- Identify appropriate measures to avoid, mitigate or reduce those effects; and
- Give statutory bodies and other stakeholders the ability to comment on those effects and measures.

We do not operate any sources of water supply through direct abstraction as we are wholly dependent upon bulk supplies of treated water. The contracts under which this treated water is obtained require us to align our demand management and restrictions to those of the relevant Supplying Water Company. On this basis, we do not believe that an SEA is required, however, we will take part in a SEA if invited to do so by a Supplying Water Company.

## Section 6. Recovering from Drought

### 6.1. Assessing a Return to Normal Conditions

As part of our ongoing review of the water supply situation and our regular dialogue with the Supplying Water Company, we will monitor the water resources position within the affected WRZ. Triggers for de-escalation will be agreed and discussed at in the DEMOT meetings. Regular communication should ensure that we have visibility of the anticipated timelines for drought recovery.

Only when the Supplying Water Company has determined that resource levels and expected weather conditions have improved sufficiently, will we meet with the Supplying Water Company to consider whether the water resources position has returned to normal conditions. Once it is agreed we have reached Business as Usual (Level 0) we will communicate the completion of the drought recovery to the regulators, stakeholders, and our customers. The DEMOT will continue to meet until the Post-Drought Review actions have been identified and endorsed. This should be within six months of returning to Level 0.

### 6.2. Post-Drought Review Actions

Once a return to normal conditions has been confirmed for a given WRZ, a review covering NAV Areas affected will be carried out and the lessons learned from the drought event will be identified. This review may identify and propose changes or improvements to our Drought Planning for future drought events. We will engage with the Supplying Water Company and the relevant stakeholders and will prepare a lesson learned report and recommendations within six months of the ending of drought measures. The report will be reviewed and endorsed by the DEMOT once agreed and then submitted to the Leaf Water Board for sign-off. Our Drought Plan will be updated as necessary to reflect any agreed actions.

Our Lessons Learned Report document will be published on our website. We will also share the outcomes with our customers and other stakeholders and regulators via a planned workshop or meeting so as to gather any feedback and comments regarding the outcomes. The DEMOT will be responsible for ensuring the Post-Drought Review and Lessons Learned Report take place in accordance with agreed timescales.

## Section 7. Appendices

### 7.1. Appendix 1 – Our NAV Areas

This draft of our Drought Plan is for NAV Appointments up to and including 28 May 2024 and therefore pertains to three NAV Areas. These are:

- Lenham
- Abbots Vale
- Heybridge 4

We have been granted a further six NAV Appointments since 28 May 2024 and we have thirty NAV Applications currently being processed by Ofwat as of the 4 October 2024. We will include many of these applications in our Final Drought Plan as we expect the Variations will have been granted. We will agree a cut-off date for New Appointments and Variations as part of that finalisation process and this will sweep up all the NAV Areas we have been granted by that time. Thereafter, as our portfolio of new appointments increases, we will periodically add new sites to this Appendix. This will be at least annually.

The build out for most NAV Areas will be several years so the numbers of customers in each site will be growing for some time.

Table 7.1 below summarises the trigger levels and actions as set out by the Supplying Water Company. Our NAV Areas will align and match these Levels of Service. The table includes the specific likelihood of each trigger level being reached by representing the number of times this measure is expected to be implemented in a certain period of time, or the annual chance of it occurring. For example, either 1 in 100 years, or a 1% chance. We have Bulk Supply Agreements in place with the relevant Supplying Water Company for each of these NAV Areas. Links to the relevant Supplying Water Company's Drought Plan can be found within the relevant section below.



NAV Area	Leaf Water WRZ	Supplying Water Company	Supplying Water Company WRZ	Level 2 – TUB	Level 3 - NEUB	Level 4 – Rota Cuts, Standpipes
Lenham	Lenham Supply System	South East Water	WRZ 6: Maidstone	1 in 10 years	1 in 40 years	1 in 50 years
Abbots Vale	Abbots Vale Supply System	Anglian Water	West Suffolk and Cambs	1 in 10 years	1 in 40 years	1 in 100 now 1 in 200 after 2025
Heybridge 4	Heybridge Supply System	Essex & Suffolk Water	Essex	1 in 20 years	1 in 50 years	1 in 250 years

**Table 7.1: AWIN NAV Areas and Our Relationships with the Supplying Water Companies**

### 7.1.1 South East Water Area

South East Water is a water only company (WOC). It has a total of eight WRZs (1-8) across three Drought Management Areas. Of the Drought Management Areas, the Western area is geographically separate from the conjoined Central and Eastern areas. We are considered an external stakeholder, as set out in South East Water’s Drought Plan, and will receive communications from, and will work collaboratively with, South East Water should a drought event arise.

Their Drought Plan includes their process for issuing a TUB and lists all the exceptions to any restrictions. Our Drought Plan implementation will align to their Drought Plan where there is an impact on our NAV Area.

South East Water Drought Plan weblink: [South East Water Drought Plan 2022](#).

As explained in Section 3.7 of this plan if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each NAV Area.

#### 7.1.1.1 Lenham, Kent

This residential site is situated near Lenham within the South East Water area. South East Water are the Supplying Water Company for this NAV Area and are contracted to provide this service through a Bulk Supply Agreement. There are currently no connected household properties within the NAV Area, the first connections are anticipated in late 2024. There are no NHH properties being developed on the site.

Local Newspapers:

Kent Online: [Kent Online](#)

Kent Live: [Kent Live](#)

East Kent Mercury

### **7.1.2 Anglian Water Area**

Anglian Water is a water and sewerage company (WASC). It has a total of 28 WRZs. With the exception of Hartlepool, the WRZs are conjoined. We are considered as an external stakeholder, as set out in Anglian Water's Drought Plan, and will receive communications from, and will work collaboratively with, Anglian Water should a drought event arise.

Their Drought Plan includes their process for issuing a TUB and lists all the exceptions to any restrictions. Our Drought Plan implementation will align to their Drought Plan where there is an impact on our NAV Area.

Anglian Water Drought Plan weblink: [Anglian Drought Plan 2022](#)

As explained in Section 3.7 of this plan if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each NAV Area.

#### **7.1.2.1 Abbots Vale, Bury St Edmunds**

This large residential site is situated on the edge of Bury St Edmunds within the Anglian Water area. Anglian Water are the Supplying Water Company for this NAV Area and are contracted to provide this service through a Bulk Supply Agreement. There are currently no connected properties within the NAV Area, the first household connections are anticipated in early 2025. There will be a small number of NHH properties built as part of the development suitable for local businesses and amenities.

Local Newspapers

Suffolk News: [Suffolk News](#)

Bury Mercury: [Bury Mercury](#)

East Anglian Daily Times: [East Anglian Daily Times](#)

### **7.1.3 Essex and Suffolk Water Area**

Essex & Suffolk Water is a subsidiary of Northumbrian Water (NW) and is a water only company. It is split into two geographically separate Supply Areas with a total of 4 WRZs. We

are considered an external stakeholder as set out in Northumbrian Water's Drought Plan and will receive communications from, and will work collaboratively with, Essex and Suffolk Water should a drought event arise.

Their Drought Plan includes their process for issuing a TUB and lists all the exceptions to any restrictions. Our Drought Plan implementation will align to their Drought Plan where there is an impact on our NAV Area.

Essex & Suffolk Water Drought Plan weblink: [Essex & Suffolk Drought Plan 2022](#)

As explained in Section 3.7 of this plan if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each NAV Area.

#### **7.1.3.1 Heybridge (4), Maldon**

This residential site is situated near Heybridge within the Essex and Suffolk Water area Essex and Suffolk Water are the Supplying Water Company for this NAV Area and are contracted to provide this service through a Bulk Supply Agreement. There are currently no connected household properties within the NAV Area, the first connections are anticipated in late 2024. There are no NHH properties being developed on the site.

##### Local Newspapers

Maldon Standard: [Maldon & Burnham Standard](#)

The Gazette & Essex County Standard: [The Gazette](#)

## **7.2. Appendix 2 – Example of Customer Communication Letter for Level 1.**

### **Water Conservation**

Dear *Customer Name*,

Water conservation is important to us all for many reasons. Water is a precious commodity and as your water company we are responsible for managing your water so as to provide a seamless service to you, our customer. Your water charges are based on the volume of water you use, so conserving water will also benefit your bank balance.

You may be aware of increasing pressures on water resources in your area and we can confirm there is a real risk of a drought occurring later this year. We are requesting all our customers to help conserve supplies. If many households in the area, make changes to their water usage now this could result in delays to the introduction of restrictions on use and in some cases avoid the need for restrictions all together.

Here are some water saving tips that will not only help conserve supplies but will also help the environment (and save you money!).

#### **Inside your home:**

- When using your washing machine, wait until you have a full load.
- Do the same with your dishwasher if you have one.
- If you wash dishes by hand, use the sink or a bowl, not a running tap.
- Opt for a shower rather than a bath and keep the time in the shower to a minimum. Every minute less in the shower could be up to 12 litres saved.
- Don't run the tap while brushing your teeth – this could save around 9 litres per minute.
- Wash your fruit and vegetables in a bowl of water and then use the water on your plants.

#### **Outside your home:**

- If you are watering your garden, consider using bath or shower water for watering your plants. You can find more information about doing this online.
- When watering your garden, do this either early in the morning or later in the evening as this reduces the amount of water lost to evaporation.
- Use a watering can to water plants directly, rather than a hose, as a hose can use up to 1000 litres of water per hour.
- If you have a car, consider washing only the parts that keep you safe, like the windows, mirrors and lights.

You can find more information online, at: <https://www.waterwise.org.uk/save-water/> and on our website: [Leaf Water](#)

We do hope you find these tips useful in helping conserve this precious resource.

### 7.3. Appendix 3 – Compliance with Drought Plan (England) Direction 2020

This compliance matrix confirms which matters to be addressed in a Drought Plan according to Drought Plan (England) Direction 2020 are within this document or are not applicable to us as a NAV.

Matter – 3 (1) a-j	Section or not applicable?
a) how the water undertaker’s management structure will manage, communicate, and make decisions when using its Drought Plan;	This is set out in Section 4.
b) the drought management measures that a water undertaker expects to take to maintain supply for the onset, duration and abatement of all potential droughts covered by its plan;	This is set out in Section 3.
c) how the sequencing of measures has been designed to limit impacts on customers and the environment;	This is set out in Section 3.
d) the magnitude and duration of the drought scenarios against which the Drought Plan has been tested to provide security of supply;	This is not applicable to us as a NAV as we don’t have our own water resources. We have engaged with the Supplying Water Companies and agreed to have at least quarterly meetings to ensure we understand the outcomes of their Drought Planning and current forecasts.

Matter – 3 (1) a-j	Section or not applicable?
(e) the permits, orders and any other authorisations that the water undertaker expects to need in order to implement the drought management measures in its Drought Plan including mitigation and prevention measures;	This is set out in Section 3 and Section 4.
(f) any pre-application steps agreed to ensure that the water undertaker is able to make any necessary applications in a timely manner to those bodies responsible for granting permits, orders and any other authorisations during the onset, duration and abatement of all droughts covered by its Drought Plan;	As a NAV we will not be making applications for drought permits. We will make applications for an ordinary or emergency drought order when required. This is set out in Section 3 and Section 5.
(g) the measures that will be used to monitor, prevent and mitigate any adverse effect on the environment resulting from the implementation of drought management measures;	This is set out in Section 3
(h) the compensation payments that a water undertaker expects to make as a result of the implementation of a drought management measure;	This is set out in Section 5.
(i) how a water undertaker will review the ongoing effectiveness of its Drought Plan and act on its review;	This is included in Section 4.

Matter – 3 (1) a-j	Section or not applicable?
(j) how the Drought Plan is consistent with the water undertaker’s Water Resources Management Plan and any voluntary steps that will be taken to collaborate regionally on drought management measures.	This is set out in Section 1.

**Table 7.2: Compliance Matrix**

## Section 8. Governance and Document Control

### 8.1. Security Statement

In publishing our draft Drought Plan and in accordance with section 39B and 39C of the Water Industry Act 1991, this security statement confirms that no information has been excluded from our plan on the grounds of national security.

### 8.2. Commercial Statement

No exclusions have been made on the grounds of commercial confidentiality.

### 8.3. Version Control

Version	Date	Author	Reason for new version	Sections affected
0.1	04Oct24	Craig Southway	First draft	All
0.2	11Oct24	Craig Southway	Incorporating peer review comments	All

Approval – Signed



**Iain Amis**

Managing Director