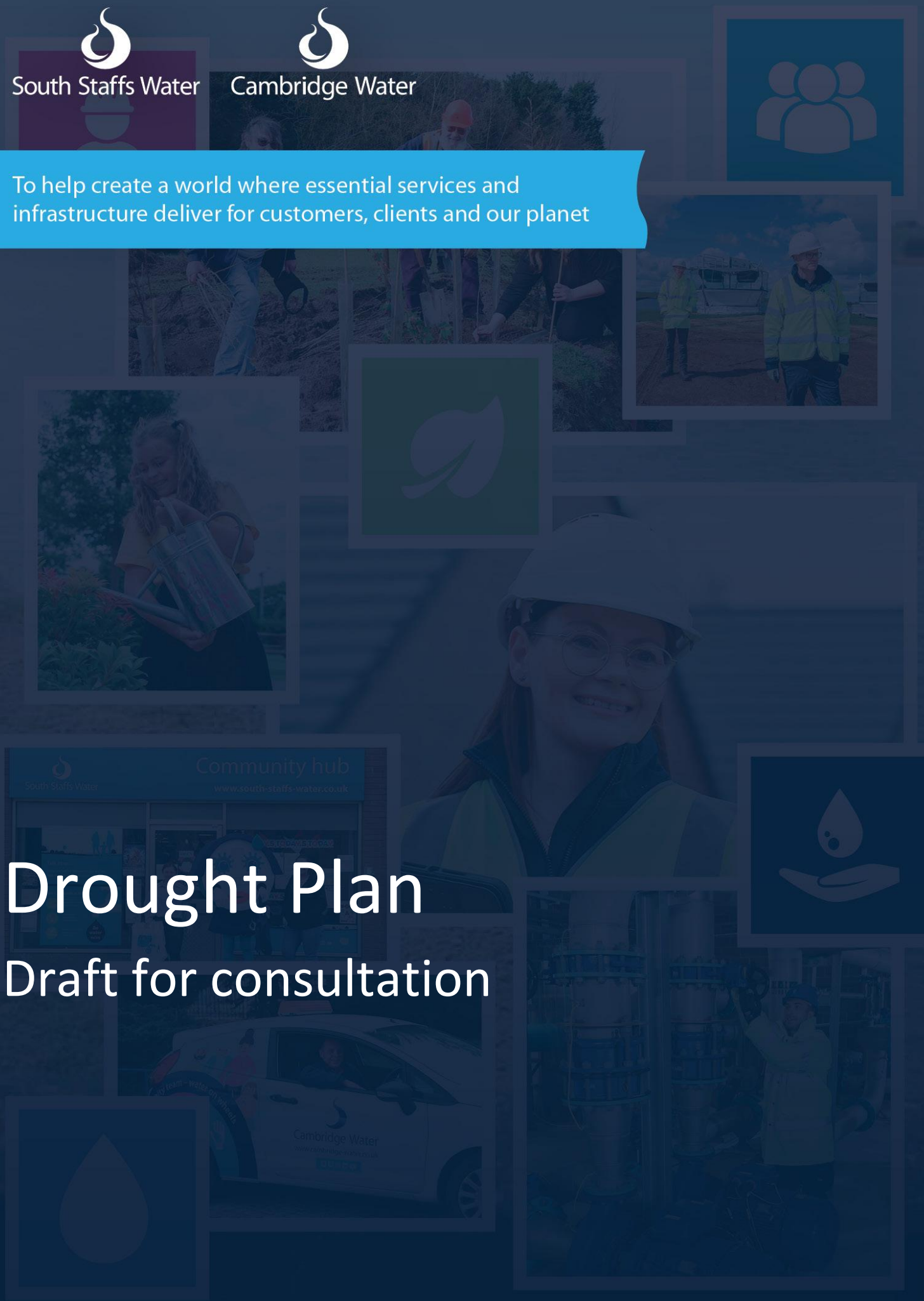
South Staffs Water Cambridge Water

To help create a world where essential services and infrastructure deliver for customers, clients and our planet



Drought Plan

Draft for consultation

Contents

1. Introduction

This section explains why we produce a drought plan, what it includes and the statutory process that we follow to produce and update our plans. It also provides an overview of our supply area, and the consultation that we carry out when producing and updating our plan.

1.1 Overview of the drought planning process

A drought is a naturally occurring event resulting from less than expected rainfall over a prolonged period, and every drought is different. Droughts can impact the environment, business and water supplies. This drought plan sets out the actions we will take before, during and after periods of extended dry weather. It describes how we will monitor and manage both supply- and demand-side options to maintain water supplies. We have tested this plan against droughts of different duration and severity, to ensure it is robust across multiple drought scenarios.

We published our last drought plan in 2021, in accordance with the latest published guidance from the Environment Agency and Government Directions. This plan was approved by the Secretary of State for Environment, Food and Rural Affairs and we have now reached the minimum required period for updating our plan, which is every 5 years.

In preparing this drought plan, we have consulted with regulators, local stakeholders and neighbouring water companies, as well as with the Environment Agency.

This drought plan acts as an operational framework that sets out how we will manage the risks posed by drought conditions and is reviewed annually by the water resources team to understand any key changes to the elements included within the plan, such as our drought triggers, drought actions, monitoring, communications strategy and business as usual or normal conditions. This ensures that we identify any changes that could affect the implementation of the plan in a drought. We will also review the detail following any dry weather or peak demand events out of the ordinary and revise the plan where appropriate. We will discuss any changes necessary with the EA, and if any changes required are deemed to be a material change in circumstances, then we will submit a revised plan to Defra, for publication and consultation.

When publishing our drought plan, we are required to exclude any matters of commercial confidentiality and any material that is contrary to interests of national security. We can confirm this plan does not contain any commercially confidential information. An accompanying statement from our Security Manager demonstrates that this plan has also been assessed against Security & Emergency measures Directive (SEMD) and contains no information on national security.

1.2 About the South Staffs Water supply area

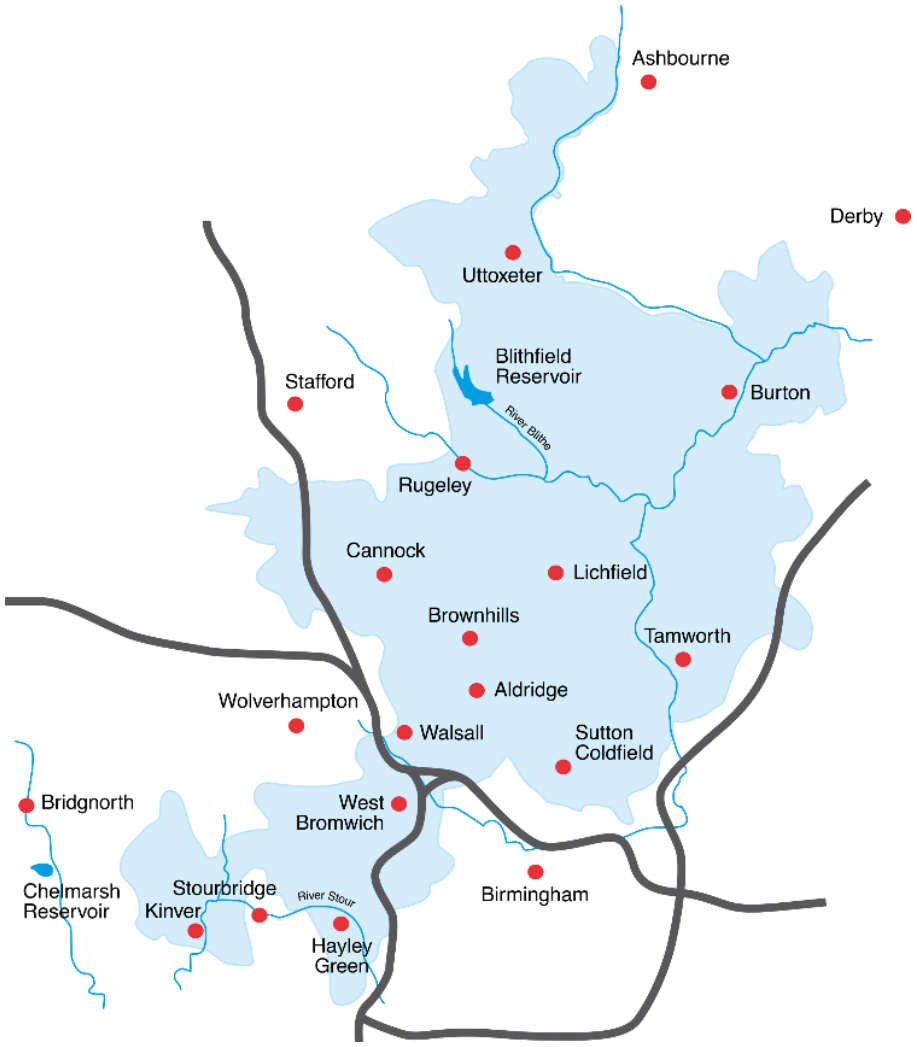
We have produced separate plans for our South Staffs Water and Cambridge Water regions. This is because of the geographically separate nature of our supply areas.

In the South Staffs region, we supply wholesome potable water to a population of circa 1.3 million in the West Midlands, the Black Country and parts of Staffordshire. The supply area is shown in figure 1 below.

We have a well-integrated water supply network and can move water all around our area of supply. In a dry year our water resources are supplied approximately equally from surface water and groundwater sources linked by an extensive strategic mains network. We operate two surface water works and 26 groundwater sources. One of our surface water works provides a major bulk supply to Wolverhampton (Severn Trent Water) and there are also several

other small bulk imports and exports with Severn Trent Water, which have been in operation for several years at the periphery of our supply area.

Figure 1 Area of supply and drought management area



1.3 Links to regional plans and the WRMP

Our current WRMP, which is available on our website, includes details of our forecast resources position over 25 years and demonstrates the ways in which we plan to meet the demand for water over that period. It also demonstrates that deployable output exceeds dry year average daily demands and that we can maintain security of supply for our customers under normal conditions. In addition, projected peak demands for the critical period of a 'peak week' over the planning period can also be met with available peak deployable output.

In developing this drought plan, we have had due regard to other plans, including neighbouring water companies' plans, regional plans, our WRMP, and the Environment Agency drought plans.

One of our key aims is to produce consistent customer messaging, for example, taking an aligned approach to temporary use ban (TUB) notices - and where practicable, further alignment of drought measures. Working closely with the regional water companies, the Environment Agency and other stakeholders is fundamental to this.

Regional Planning

We are a core member of Water Resources West (WRW), which has been set up to facilitate the creation of a regional water resources plan. We have produced this drought plan with both regional planning and our own WRMP in mind.

We have aimed for consistency across our own and the regional plans, for example, with our assumptions on bulk supplies in planning tables, and alignment with other water companies in WRW in areas such as communications - including the stakeholder engagement process and in the wording of customer restrictions. Although future droughts will inevitably affect different WRW members in different ways, and we will not necessarily all impose the same drought measures at the same time, we are as consistent as we can be.

Regional Statement of Intent Summary

The Environment Agency's Water Resources National Framework (WRNF25) published in June 2025 sets an expectation for regional groups to develop a drought Statement of Intent that clearly explains the role they will take in drought planning and management.

WRW seeks to facilitate knowledge sharing and improve understanding of water and drought management across our members. It supports our members to plan for drought, and encourages alignment of drought responses and communications, in the following key areas:

- Convening a WRW drought group, and nominating a dedicated drought officer.
  - Providing input into other regional and national drought groups.
  - Resources sharing and operational coordination.
  - Demand management campaigns and consistency of communications and noticing.
  - Coordination of communications.
  - Post drought review.

WRW will seek to supplement other drought groups such as the national drought Group (NDG), provide drought support to its members, and consider other sectors and abstractors.

The full Statement of Intent, along with other drought material, can be found on WRW website here: WRW Drought Statement of Intent

Severn Trent drought plan

During the pre-consultation for drought plans, we have consulted with neighbouring water companies in producing our respective drought plans to make alignments where practicable, for instance in imposing restrictions and communications during a drought. Due to the nature of our supply areas and resources, droughts can impact companies differently, so communication throughout an emerging drought situation is important, and we do this with other companies and through national and regional forums. We work particularly closely with Severn Trent where we have combined abstractions on the River Severn through regulation periods.

Environment Agency drought planning

The Environment Agency has published a drought plan for the West Midlands area which covers the catchments in which we operate.

We regularly exchange information and data with the EA during a drought relating to supply demand and position and forecasting for public water supply. The frequency of data exchange and communications will increase as a drought progresses in severity.

The Environment Agency will also provide regional and national co-ordination of drought through monitoring, reports and advising during a drought on the impact on the environment, and they are responsible for certain environmental actions. Where possible our Drought Plan is aligned with the Environment Agency Drought Plans that outline how they work with sectors and stakeholders to manage drought impact.

Emergency Drought Plan

This plan will be complimented by an Emergency Drought Plan at Level 4, which is a new requirement to formalise our existing Emergency Plan capabilities for drought specific situations. The Environment Agency have provided guidance on how to produce these plans, and we will be producing our first draft in the summer of 2026

1.4 Environmental Responsibilities

We recognise that water supply abstractions can place additional stress on the water environment and habitats and we are therefore committed to ensuring our activities are fully assessed for any environmental impact, and that these are minimised. Within our drought plan, we have prioritised actions to maintain public water supply that have the least potential for environmental damage, and plan to implement demand management actions first. We have also included monitoring plans and mitigation measures for the impact of any drought actions that we may need to take.

Abstraction conditions to protect the environment

We have several licences where there is an existing known impact due to abstraction which is mitigated by licence conditions to protect the environment. We have one licence where we reduce or cease abstraction according to a river flow trigger, and two licences where we provide environmental support by augmentation when river flows are low.

Measures that we deliver through the Water Industry National Environment Programme (WINEP), such as our investigations into the Darnford Brook, Leamonsley Brook and Blakedown Brook will help ensure that the environment and habitats can be more resilient to droughts and low flow issues. This is complimented by licence abstraction reductions being applied across many of our groundwater sources, outlined in greater detail below.

Sustainability reductions

We have already made some permanent reductions to licences in the periods preceding the publication of this drought plan to protect and prevent deterioration of the environment. We are also committed to reductions at a further 24 sites through AMP8. In total, by 2030 this will be 18 million litres a day of water which we no longer abstract returned to the environment. We are also working with the environment agency and the regional groups to quantify further future reductions under the environmental destination principles outlined in our WRMP.

The aim of this plan is to demonstrate how we would manage resources and demand through several variable but plausible drought sequences, by implementing a range of management actions that are available to us. It does not set out to be prescriptive, as maintaining flexibility in the face of different circumstances is a key requirement. Instead, it presents a framework and timetable of actions to be considered through the types of drought sequences we might expect. This allows operational managers to make informed decisions and develop action plans in an effective manner.

1.5 Demand Management

Reducing leakage is one of our key operational priorities, and we have included stretching targets to reduce leakage further year on year in our WRMP. We seek to utilise new technologies wherever possible to improve our leakage position, and to renew failing mains assets with a targeted reduction of a further 10.8 million litres/day by 2030. During droughts, we recognise that shorter term reductions in leakage can be beneficial to the overall supply situation, and so this is a key action that we implement early on in a drought.

For AMP8 we are investing in universal metering, taking our current meter penetration from 45% to 77% or better. Not only will this help us identify more leaks and sooner, but it will support our ongoing water efficiency programme to reduce per capita consumption, and importantly in droughts, provide the basis for customers to understand their own use in the context of our communications to conserve water.

We also have a programme of targeted water efficiency for our non-household customers, including replacement of non-household meters with smart meters to provide data to inform them on their water consumption.

1.6 Consultation on our draft drought plan

We are committed to engaging with all stakeholders who have an interest in this plan. Once the Secretary of State has given permission to publish our draft plan, there will be a ten-week consultation period for key stakeholders to make their representations. We will then revise our plan as appropriate and produce and publish a statement of response to the comments we receive along with the revised draft plan by the end of October.

Stakeholders wishing to make representations, comments or raise questions on this draft plan should submit them to:

Defra
Water Company Drought Plan
Department for Environment Food and Rural Affairs
3rd Floor
2 Marsham Street
London SW1P 4DF

Alternatively, representations, comments and questions can be emailed to: water.resources@defra.gsi.gov.uk.

Pre-consultation

In accordance with the Environment Agency's drought plan guidance, we consulted with our statutory consultees before producing this draft plan to identify any issues of importance and for any comments that we should consider. Our pre-consultation ran from December 2025 to 10th January 2026. As part of this we explained the changes that we were planning to make and invited comments on these and invited other feedback.

Alongside statutory consultees we engaged with other stakeholders, including neighbouring water companies. We are also required to consult with any licensed water supplier that supplies water to premises in our area of operations through our supply system. There are currently inset variations appointed to ESP Water Ltd, Integrated Water Networks Ltd, Leep Networks Ltd and Icosa Water services Ltd - these have been included in our consultation. Comments received during the pre-consultation are also set out in appendix A.

1.7 Types of drought

A drought is a naturally occurring event, and each drought sequence is different. We discuss some of the different types of droughts that have historically required us to activate our drought plan and implement the actions explained later in this document. Droughts have different severity, duration and timing and can occur in different ways and at different times regionally and nationally. Understanding historic events is valuable in planning for a range of possible future droughts.

Environmental Drought

When there is a shortage of rainfall, and often combined with above average temperatures, river flows are typically reduced and there is more reliance on groundwater to support environmental flows and other sectors such as agriculture. This can cause stress on habitats and wildlife due to lower flows, particularly when catchments may not be as naturally resilience to dry weather as they might otherwise be. Groundwater levels would typically not be impacted, and water supplies for human consumption are not affected.

Agricultural Drought

This type of drought typically follows environmental drought, or is at the same time, where dry weather and lack of rainfall begin to both impact crop production and the access to water for irrigation, caused by soil conditions and restrictions to surface water abstraction due to licence conditions under low flows. Again, there will be more reliance on groundwater and agricultural storage reservoirs.

Public Water Supply Drought

A drought that impacts on water resources occurs following a prolonged period of below average rainfall and can affect surface water and groundwater in different ways and over different timescales. Reservoirs can be impacted after many months of dry weather at any time of the year, whereas groundwater may only be impacted following multiple years of dry winter, when the aquifer is normally recharged. Therefore, different companies can be affected at different times depending on resources that they use, and the resources position preceding a drought, as well as localised catchment recharge effects. Water companies are required to plan for quite severe droughts that do not often occur due to the impact they can potentially have on the public. This planning involves numerous measures to ensure customers are only impacted in exceptional circumstances, although we also use the tools we have available to respond in all types of droughts, and monitor how drought conditions are progressing closely.

1.8 Lessons learnt from 2025

To strengthen the preparation of this plan we have undertaken our review of the 2025 drought; the actions that we implemented, and taken any lesson learnt from our drought response. In 2024-25 we experienced a dry winter, including the driest spring on record, followed by the hottest summer on record with several heatwaves. This caused increased customer demands and stress on supply availability, and our drought plan was activated. We entered drought trigger Level 1 in May, and Level 2 in August. Given the timing of entering Level 2, and the short duration of benefit predicted, we considered but did not need impose restrictions on our customers. Following a wetter autumn, recovery to business as usual occurred in November.

We had strong internal management of the drought, with two tiers of response at a tactical and executive level. This enabled a clear process for internal discussion and strong evidence base for decision-making.

Overall, our response effectively delivered demand reductions and managed supply availability which minimised customer impacts while ensuring that there was no risk to customer supplies or environmental impact. The activation of our drought response has led us to review and identify any improvements that could be made. We have concluded that several internal improvements could be made, along with improvements to customer communication and the

streamlining of information transfer with our regulators. The full 2025 review report is included as Appendix F, and the summary recommendations are as follows:

These are the key actions we have identified that we need to continue in future droughts:

- Initiate Blithfield Conservation meetings when Blithfield level begins to drop, including focus on the actions that this incorporates regarding outage, NTN usage etc.
- Convene the executive level team and run as incident mode at appropriate point in drought.
- Engage with customers through a range of methods to ensure broad reach.
- Continue to utilise the weekly EA update email to inform across the teams.
- Continue to be transparent on resources position and actions with stakeholders through meetings and forums.

After this review of the drought of 2025, we have created the following recommendations that will improve our response to a drought when it next occurs:

- Consider preparing of 'off the shelf' water efficiency tips to roll out to customers if appropriate
- Make customers aware off water saving strategies earlier in the year, so that they are not surprised when messaging ramps up during warmer months.
- Send a prompt thank you in autumn to our customers for their efforts and outline the impact.
- Investigate ways to reach more customers through marketing emails, and different forms of social media posts.
- Explore how to offer communications on drought in additional languages, and to varied demographics.
- Improve internal communications by inviting a wider number of teams to the internal Blithfield Conservation meetings.
- Continue to work with the Environment Agency on how we can most efficiently communicate with them, and avoid meetings being repeated.
- Create a 'River Regulation Management' procedure.
- Ensure our TUB information is reviewed during Level 1 to keep it live and ready to deploy if required.
- Implement the new operating philosophy for NTN.
- Review the planning of large site planned outages in winter ahead of a potential dry summer.
- Review Brindley Bank every March to prepare for any works required.

Changes for this plan

Several of the recommendations from our 2025 review have been included as BAU activities which will be implemented through our Summer Action Plan preparatory stage, in particular outage planning, review of Brindley bank and internal communications. Improvements to our customer communications are ongoing, following our adaptive and agile approach to effective comms.

Since our last drought plan, we have removed one of our supply options, for potable infusion at Blithfield, as this was evaluated to have limited benefit compared to improved operational use of Brindley Bank and NTN. We have also committed to undertaking the environmental assessment for an additional potential supply option, which would require a drought permit as an extreme drought Level 3b option, which will be consulted on with the Environment Agency for our revised draft plan.

We have not changed our drought triggers for Levels 1-4, nor do we propose any additional supply options or permits, however we will be updating our environmental assessment reports for our drought permits as per our action plans for the revised draft plan. We are also looking at developing an environmental stress trigger and have undertaken an initial phase of work evaluating hydrology related stress, percentage of river flow depletion and links to ecological stress. We will continue to work on this with EA review and include an update for our revised draft plan.

2. Drought triggers

This section provides information about how we monitor our water resources as part of our day-to-day activities, and how we use our triggers to monitor and forecast our water resource position and prospects during a drought. It also explains how our triggers have been validated against historical conditions during different droughts, and the different stages in a drought.

2.1 Monitoring of water resources

We continuously monitor various meteorological, environmental and water resources data to understand our supply position and any emerging drought conditions. These are incorporated into our drought indicators which inform our drought triggers at different stages of drought and tell us when we should consider taking the various actions available to us during a drought, and when drought impacts will have ceased and a drought has ended.

Our key indicators are levels at our Blithfield Reservoir and Clywedog reservoir which we track against trigger curves to determine our response to any prolonged dry weather or drought. The Environment Agency manages the levels at Clywedog, but we do respond to the level with actions set out in our licences in the event of any prolonged dry weather.

A key indicator is tracking groundwater levels at several sites across the area against long term data to determine the status of water resources. These have been selected to represent the supply area and incorporate long term records with regular updated data. The monitoring network was developed this year to maintain updated drought triggers now and in the future. We now monitor 4 strategic observation boreholes over the area that supplies our water.

For this revised plan we have included enhanced climate monitoring. Lower rainfall than average will usually precede a drought, and so we monitor total rainfall against the long-term average record, and to update our approach we have also adopted widely used indices that show the cumulative impact of below average rainfall including SMD.

Groundwater in the aquifers in which we operate are typically resilient to short and medium-term droughts. However, groundwater indicators can be used to characterise longer term drought events and so we have assessed if groundwater triggers would be complimentary to our surface water triggers. Our review of groundwater triggers for drought utilised the Standardised Groundwater level Index (SGI), which is a commonly used metric for groundwater drought impacts due to low rainfall and recharge, and was benchmarked against historic droughts. Whilst our abstraction boreholes did not show a drought response to historic sequences, several observation boreholes did, so we have included monitoring of these over the longer term as one of our drought indicators not directly linked to triggers or drought actions, but as an indicator of the potential onset of prolonged drought.

Environmental stress can occur before any water resources impact; this is usually because of lower river flows. We are working to incorporate additional triggers to indicate environmental stress. An initial phase of work has been completed which suggests that a trigger flow rate or 'artificial Hands-off flow' level for surface water in the Blithe at Hamstall Ridware and the Trent at Yoxhall and North Muskam could be used. This has shown that a trigger prior to existing HoFs is typically reached in historic drought sequences, despite the % flow depletion not indicating any ecological impact based on the sensitivity of the waterbodies. Further work to determine the ecological stress in this flow window will inform the development of an environmental stress trigger, and we will continue to work on this with the Environment Agency and include an update in our revised draft plan as appropriate. If we choose to adopt these triggers, we will make an amendment for the final plan. This would have no impact on the existing triggers for level 1-4

This monitoring data is key developing our drought indicators and triggers, which are discussed in more detail later, and informs our drought status and the actions that we can take at each stage in a drought.

Our supply system

Our supplies come from 24 groundwater sites, and two surface water intakes, one on the River Severn and one from our Blithfield reservoir. Our groundwater supplies are reliant on the recharge of the aquifer, which occurs through the winter months when the rainfall is effective in infiltrating through the soil to the underground stores. Several dry winters can begin to lower the water levels overall, leading to even lower levels during the summer when the normal recession of levels occurs. However, the geology of our boreholes in the sandstone, and its high storage characteristics means that our groundwater supplies are far more resilient to even longer duration droughts.

Our surface water systems are more susceptible to the impact of short-term droughts. Our Blithfield reservoir levels are directly impacted by lower inflows, which can be seen in the historic reservoir level curves. The River Severn is a source of water utilised by multiple abstractors, as such it is governed by the River Severn Regulations during periods of drought.

2.2 Vulnerability to drought

We have assessed the vulnerability of our supply system to different types of drought events, the likely frequency of drought and the scale of the impact of drought events in our Water Resources Management Plan (WRMP). This includes understanding our resilience to 1 in 200-year drought events and to 1 in 500-year events, in terms of how we would expect our normal supply availability to be impacted. Our WRMP states what our planned levels of service are at the time of publication.

Our surface water intakes are quick to respond in periods of drought, and whilst our groundwater supplies are more resilient, lower groundwater levels can have a very a minor impact on a small selection of our sources. A critical factor for us is ensuring we have sufficient supply available to meet summer demands during a drought event, and to minimise the environmental stress in the early stages of a drought.

Our WRMP states what our planned levels of service are for the frequency of customer restrictions, such as temporary use bans – or hosepipe bans for domestic customers; non-essential use bans on non-household customers; and emergency drought orders to further restrict supplies.

We are conscious that there are actions that we can take earlier in a drought sequence that could benefit the environment, when it may be under additional stress due to drier weather before public water supply impacts are seen. Because of this, and based on pre consultation comments from the Environment Agency, we have developed an Environmental Stress indicator for this plan to be refined for final publication. This precedes Level 1 actions.

Droughts and heatwaves

A drought that impacts public water supply is usually a medium to long term event impacting availability of water due to shortage of rainfall to recharge the aquifer, usually over consecutive winters. Drought events are managed with supply and demand actions as set out in our drought plan. Heatwaves are shorter events when higher than average demands for water are experienced due to hot dry weather in the summer. These types of shorter peak demand events are common and are managed as typical periods of high demands through normal operations and are planned for in a different way as part of our summer action plan. They can occur during a drought, which can elevate pressure on supplies, and if this occurs, both drought and other more business-as-usual actions and measures can be used to help reduce demands and increase supply.

2.3 Levels of Service

Our levels of service remain the same as our 2022 drought plan. These are driven by our Blithfield Reservoir trigger curves, these were last reviewed for the 2022 drought plan through a project with Mott McDonald which identified that any changes to the existing curves would not yield any additional benefit. More information on our triggers is described in later sections. The Blithfield level curves are the primary triggers for considering actions at each stage of a drought.

Table 1. Levels of service

Drought Status	Levels of Service
Above Level 1	Business as usual
Level 1	1 in 10 years
Level 2	1 in 40 years
Level 3a-b	1 in 80 years
Level 4	>1 in 500 years

2.4 Development of drought triggers

We have followed Environment Agency guidance and adopted a level-based system that identifies the severity of a drought. The levels align with the control curves we use to manage a drought situation at Blithfield Reservoir. These control curves define the drought triggers and actions that can be taken as the severity of the drought increases. Our drought triggers and related actions are summarised in table 2 below. We describe the actions in response to those triggers further on in the plan.

Table 2. Drought triggers and actions

Drought Status	Drought indicators	Demand Side Actions	Supply Side Actions
Normal	River flows normal or above average. Groundwater levels normal or high. Soil Moisture deficit (SMD) normal or low. Rainfall above the long term average. Long term forecast indicates wet weather. Average demand is low or normal.	Business as usual.	Business as usual.
Level 1	River flows below normal. Groundwater levels below normal. Soil Moisture Deficit (SMD) above normal. Rainfall below long term average. Long term forecast indicates drier weather. Average demand is above normal.	Awareness raising. Increased monitoring. Comms and first increase in demand management.	Optimising sources. Review outage. Conserve Blithfield. Consider NTN Pumpback[1] Review bulk supply with SVT.
Level 2	River flows are low. Groundwater levels are low. Soil Moisture Deficit (SMD) is high. Rainfall is below long term average.	Appeal for restraint. Ramped up demand management. Prepare for TUBs.	Actions with minor environmental impact. Brindley Bank augmentation of Blithfield

[1] NTN Pumpback is our Blithfield reservoir pumpback scheme to support reservoir levels

	Long term forecast indicates dry weather. Average demand is above normal and sustained.	Implement TUBs.	
Level 3a	River flows are notably low. Groundwater levels are notably low. Soil Moisture Deficit (SMD) is notably high. Rainfall is notably below long term average. Long term forecast indicates dry weather. Average demand notably above normal and sustained.	NEUBs. All possible actions to avoid emergency drought orders.	Moderate impact drought permit -Blithe drought permits All possible actions to avoid major environmental impacts.
Level 3b	River flows are notably low. Groundwater levels are notably low. Soil Moisture Deficit (SMD) is notably high. Rainfall is notably below long term average. Long term forecast indicates dry weather. Average demand notably above normal and sustained.	Extreme drought actions to delay emergency drought orders Environmental urgency, day zero type messaging. Communications on impacts of rota cuts, standpipes.	Drought Order on the R Severn Operate Blithfield within emergency storage Recommission mothballed emergency groundwater sources
Level 4	River flows are exceptionally low. Groundwater levels are exceptionally low. Soil Moisture Deficit (SMD) is exceptionally high. Rainfall is exceptionally below long term average. Long term forecast indicates sustained dry weather. Average demand high and sustained.	Emergency plan for drought - drought orders for rota cuts and standpipes.	

Our drought triggers are applied at the water resource zone level and have been developed with reference to the latest Environment Agency guidance. The Blithfield Reservoir triggers have not changed since our last plan, but we continue to investigate the development of environmental stress triggers in our revised draft plan for potential update for the final plan publication. This would precede stage of Level 1 to understand the where the environment may be impacted prior to water resources impacts, and actions that we could take earlier in a drought.

Our drought triggers have been tested against several drought scenarios of various length and severity, including historic drought sequences and events. Our most drought sensitive resources are the River Severn and Blithfield Reservoir, but for this revised plan we have also considered whether groundwater triggers would be appropriate.

Each trigger level aligns with our communication plan (see appendix B), which sets out the types and levels of communications that will escalate during a drought. As appropriate, triggers are adjusted to allow for the lead in time to implement associated drought actions, which can be significant in the case of some supply options.

In addition, we will also give due regard to several other factors when considering whether to implement our drought management actions. These include:

- the demand for water,
- sources which may be out of supply,
- the medium-term weather forecast,
- the soil moisture deficit,
- the time of year, and
- whether the level in Blithfield Reservoir is rising or falling.

2.5 Testing our drought triggers

We describe how we have tested our drought triggers in appendix C. The scenarios presented include droughts of a similar severity as those included in our WRMP planning assumptions, as well as more severe droughts. This appendix demonstrates that our drought triggers for managing resources and demands are robust across several plausible drought scenarios.

We will only implement certain actions if they are in the best interests of customers and the environment at that time. These decisions will be made with detailed engagement at regular intervals with key stakeholders, particularly the Environment Agency during a drought, to ensure we take the right action at the right time. Our trigger to mark the end of drought conditions is when storage at Blithfield Reservoir is above drought Level 1 (although we also consider other parameters such as river flows and groundwater levels).

2.6 Climate triggers

Prolonged periods of low rainfall will often precede low groundwater levels and river flows leading to drought.

We have used rainfall data from the MET Office for 1891-2022 in addition to our rain gauges to determine long term average totals and inflows across our Blithfield catchment. These are calculated monthly for determine cumulative totals for comparison with the LTA. We also review MORECS data from the Met Office including Soil Moisture deficit which provides early warning of the onset of drought or prolonged dry weather.

2.7 Groundwater triggers

We regularly monitor the groundwater levels in our region through live telemetry. We have not previously included any specific indicator boreholes outlined for drought planning purposes. We do however review groundwater levels to build up our overall picture of drought status and these are used in conjunction with other monitoring points as outlined above in table 2.

Based on pre consultation feedback, for this drought plan we have undertaken a review of the suitability of groundwater specific triggers that could be used to complement our existing surface water triggers. As Blithfield triggers represent the most drought sensitive part of our supply system these would represent actions much later in a drought sequence already impacting on supplies that would have required actions already to have been taken according to our surface water triggers.

The review of groundwater triggers for drought utilised the Standardised Groundwater level Index (SGI), which is a commonly used metric for groundwater drought impacts due to low rainfall and recharge, and was benchmarked against historic droughts. The review of historical data on pumping at abstraction boreholes and groundwater levels demonstrated that our abstraction boreholes are resilient to drought conditions and would not be sensitive enough to drought to develop actions based on groundwater triggers. The same approach was applied to suitable observation boreholes, which did show a response to drought sequences, although the data and processing required to use these as triggers would not be updated frequently enough to be suitable for drought response.

The recommendation from the review was that the existing Blithfield triggers were most appropriate for operational drought triggers. We will however look to incorporate the SGI approach into our regular monitoring of water resources to inform the overall picture of surface and groundwater conditions. Details of this assessment are included in Appendix G.

2.8 Environment triggers

We are seeking to develop a new set of indicators have been developed to identify when river flows suffer in a drought to understand environmental stress, and to inform measures that could be taken to mitigate low flow impacts.

Environmental stress can occur before water any resources impact, this is usually because of lower river flows. We are working to incorporate additional triggers to indicate environmental stress. An initial phase of work has been completed which suggests that whilst the water bodies in our area have not experienced environmental impacts during previous drought and are resilient to hydrological variability and low flows, that a trigger flow rate may be suitable for utilising for indicating earlier flow impacts. This has shown that a trigger prior to existing HoFs is typically reached in historic drought sequences, despite the % flow depletion not indicating any ecological impact based on the sensitivity of the waterbodies. A trigger flow rate or 'artificial Hands-off flow' level for surface water in the Blithe at Hamstall Ridware and the Trent at Yoxhall and North Muskam could be used, for example of 35Ml/d in the Blithe prior to the existing HOF of 27Ml/d.

Further work to determine the ecological stress in this flow window will inform the development of an environmental stress trigger, and any further actions that could be included for these triggers. We will continue to work on this with the Environment Agency and Natural England and include an update in our revised draft plan as appropriate, which is due by the end of October 2026.

2.9 Principles of applying drought triggers

Our drought triggers, and the associated actions that we can take linked to our levels of service have been developed so that they use the status of surface water and groundwater resources. Environmental stress triggers are included to reflect the sensitivity of watercourses within the catchment and low flows due to lower groundwater levels and rainfall deficits. Environmental stress actions would be similar to actions at Level 1 but precede water resources impacts that would result in preparing for actions such as formal customer restrictions. Our review of triggers and actions has ensured that the required preparatory actions occur prior to a drought level when actions would be implemented.

Environmental triggers may mean that we are completing some Level 1 actions prior to the level of Blithfield crossing the level 1 drought curve. However, Blithfield levels and the drought curves remain as the only driver of our drought status. Actions progress as Blithfield levels reduce, and actions at lower levels are assumed to continue as a drought progresses and potentially becomes more severe. Actions are reduced as the Blithfield levels recovery.

Moving from Level 1 to Level 2 occurs based on the levels in Blithfield alone and so it is important to recognise the time of year, the likely rainfall and inflows, and the time it takes to implement Level 2 actions. This ensures that actions only progress once Level 2 is expected to be in effect for a significant period and that the actions put in place will have sufficient time to provide benefit.

Level 3 and 4 drought actions have been defined related to triggers as recent historic droughts have not been this severe. As such, observed data is not available for validation of these rules and flexibility will be adopted in the implementation of these actions.

2.10 Drought control diagram

The drought trigger curves for Blithfield Reservoir, and the breakdown of actions in order at each level are shown in Figure 2 and Figure 3 below.

Figure 2. Blithfield Reservoir drought triggers

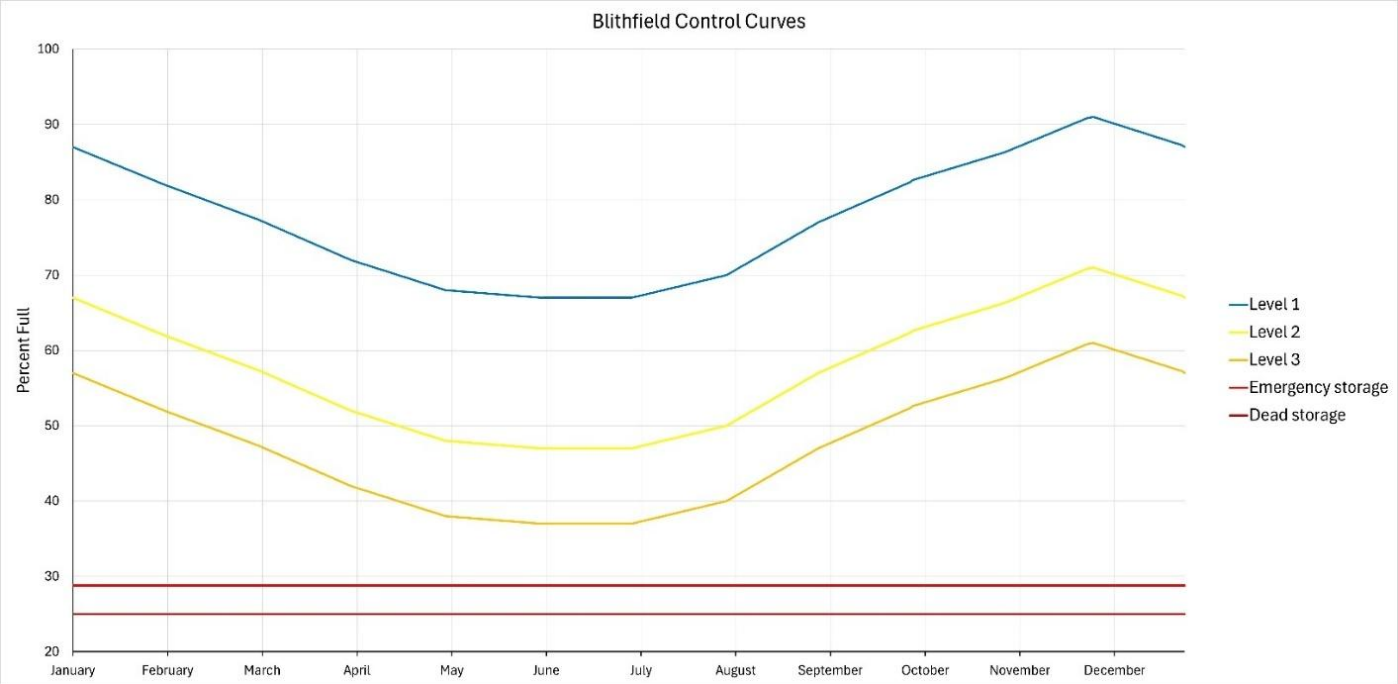
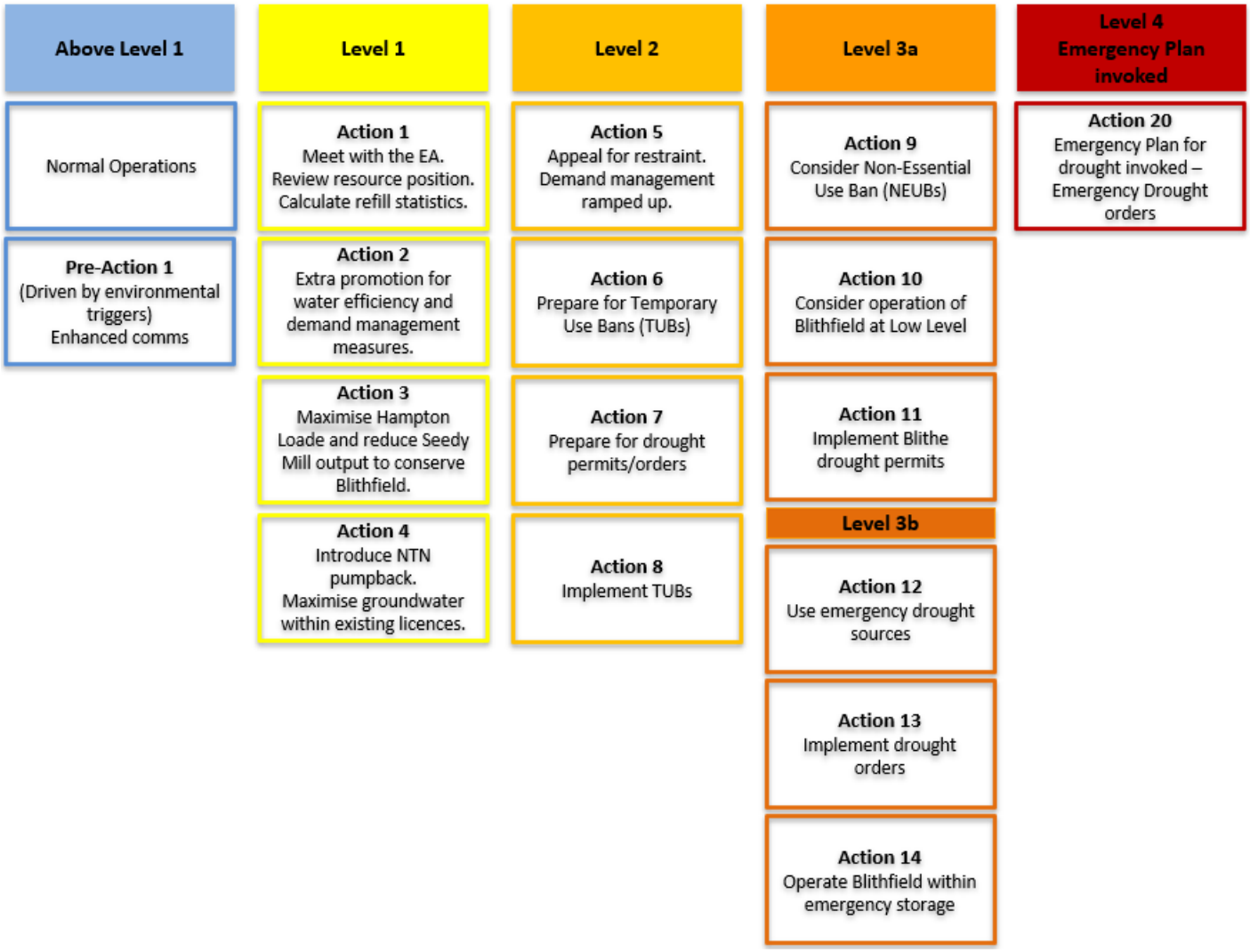


Figure 3. Blithfield Reservoir drought control rules and actions



3. Drought actions

This section explains the actions that we can take at each drought level as they are triggered through a drought sequence. Our drought triggers are associated with drought management actions at different stages during a drought event, such as enhancing communications with customers and implementing supply and demand management measures, for example temporary use bans (TUBs). Our actions are aimed to reduce impact on the environment, by managing abstractions and supplies, and reduce demands for water to manage supply and demand through a drought.

3.1 Overview of drought actions

This plan demonstrates how we would manage resources and demands through several varied but plausible drought sequences, by implementing a range of available management actions in an effective manner. We aim to balance the needs of customers against the needs of the environment by considering and implementing several demand-side and supply-side measures, maximising demand-side measures as a priority before resorting to supply side options that may impact on the environment. We implement all our drought actions at the WRZ level.

We will implement the actions described in this plan according to the triggers detailed in the following sections. Although the actions related to each of our triggers are not prescriptive, they provide a framework and timetable of actions through the most likely drought sequences we might expect to see. We have developed these actions using the experiences of historical droughts, together with the predicted impact of more severe droughts using statistical methodologies.

The drought management actions included in this plan would allow us to manage a drought sequence, like those historically experienced, as it progresses in severity, and beyond to even more extreme droughts. Unprecedented and very extreme drought beyond our known vulnerability leading to severe water shortages would be covered by measures set out within our drought emergency plans.

A key part of our drought management strategy is effective engagement with stakeholders, regulators, and household and non-household customers. Our communications approach is described in more detail in section 5 and Appendix B.

Drought triggers and drought actions

Our drought triggers are associated with actions to manage and minimise the risks of a developing drought, using both demand and supply measures. The sequencing of the actions available is when they would be expected to be required, however it is not meant to be prescriptive. Our aim is to minimise impacts on customers and the environment, whilst keeping customers and other stakeholders informed of the situation as it develops. Our supply actions are prioritised so that those with the least environmental impact are implemented first, and when demand management actions and environmental mitigations are already in effect.

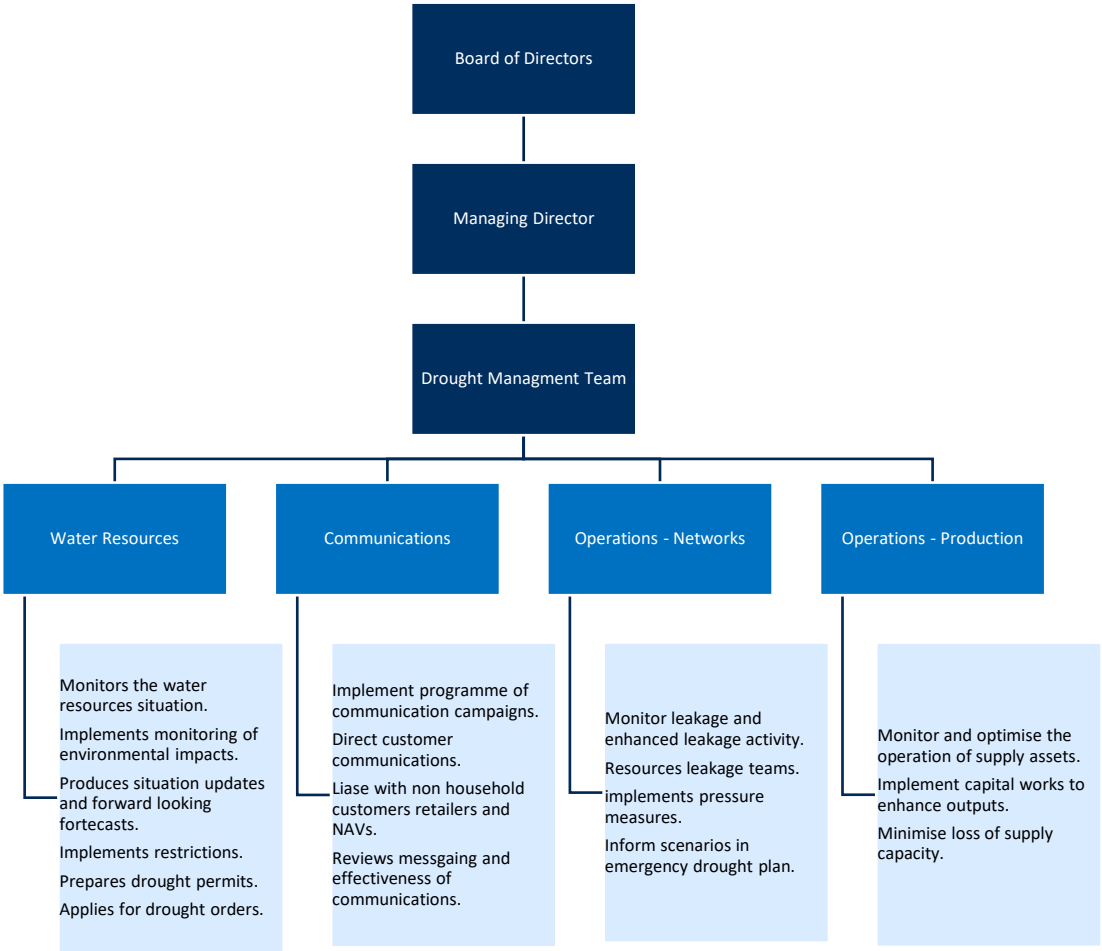
3.2 Drought management team

During a developing drought situation, Blithfield levels and environmental triggers are monitored closely by the water resources teams, with an internal Blithfield conservation meeting formed as we start to see Blithfield levels drop, this group inform the Executive management team as required. Once we are in Level 1 status, the drought management team is formally convened to conserve Blithfield's supply, implement and track actions and to feed into various regional, national and other sector stakeholder groups, as well as other key internal stakeholders. External stakeholders will include, the Environment Agency, regional water resources groups (Water Resources West), the national drought group, Retailers and NAVs[2]. The drought management team ensures that key decision making takes place, ensures that actions

[2] Non appointed variation or insets – independent water companies supplying customers within our boundary.

are being implemented and managed effectively and reports into the board. The core team is supported by technical subgroups responsible for various specialism. The frequency of meetings and activities discussed are dependent on the water resources situation and will escalate as the seriousness of drought progresses.

Figure 4. Structure of the drought Management team



3.3 Drought Triggers and Actions

Our drought triggers and related actions are summarised in table 3 below. As drought progresses all actions from lower levels are assumed to continue. These are discussed in more detail in the next sections.

Table 3 Drought Triggers and Actions Summary

Blithfield Trigger Level	Demand Actions	Supply Actions
Normal	Routine demand management messaging.	Normal operations.
Above Level 1 but Environmental Stress	Additional promotion of water efficiency, targeted campaigns.	-
Level 1	Awareness raising (internally and with the EA). Increased monitoring. Additional promotion of water efficiency and demand management.	Optimise abstractions and source availability. Review planned outages to essential (Regulatory/legal) only. Conserve Blithfield. Consider use of NTN Pumpback/BRBNK[3]. Review bulk supply with SVT.
Level 2	Appeal of restraint. Ramped up demand management. Prepare for implementing temporary use bans (TUBs), Implement TUBs. Prepare for Non-Essential Use Ban (NEUB).	Actions with minor environmental impact. Prepare for moderate impact drought permit Brindley Bank augmentation of Blithfield
Level 3a	Implement NEUB. Consider removal of TUBS exceptions. Further enhanced communications for voluntary residential water use reductions.	Apply for moderate impact drought order. Implement Blithe drought permit Prepare for drought order on R Severn
Level 3b	All possible actions to avoid emergency drought orders Extreme actions to delay emergency drought orders Environmental urgency, day zero type messaging Communications on impacts of rota cuts, standpipes Explore extreme drought options – stakeholder engagement/other sectors	All possible actions to avoid emergency drought orders. Test operation of Blithfield at low levels. Use emergency/drought sources. Extreme actions – R Severn Drought order Prepare for EDOs and rota cuts Operate Blithfield within emergency storage
Level 4	Emergency plan for drought - drought orders for rota cuts and standpipes	Emergency plan for drought - drought orders for rota cuts and standpipes.
End of drought	Return to BAU Thank customers and stakeholders	

[3] NTN Pumpback is our Blithfield reservoir pumpback scheme to support reservoir levels

3.4 Environmental Stress actions

We are still working on developing suitable environmental stress triggers that are appropriate to the hydrology and low flow impacts on ecology and the environment for the catchments in which we operate. This will require input from our environmental regulators during consultation and any updates will be provided in our revised draft plan, due by the end of October 2026.

Any environmental stress actions, if appropriate, would include additional communications with the aim to have achieved heightened awareness by stakeholders and customers of the environmental impact of dry weather and actions they can take to reduce demands and alleviate stress on the environment and aid the water resources position.

3.5 Level 1 actions

As Level 1 drought indicators are reached, a lack of rainfall will have started to have some noticeable impacts on water resources and river flows. It is important at this stage that we continue to manage and reduce demands, including leakage. Alongside these actions, we will start to ensure that availability of all sources is maximised, and plan to use the least environmentally impacting supplies. As we remain at Level 1 for a period, and progress through worsening indicators, our customer messaging will also increase in frequency and tone, as we prepare for the possibility of temporary use bans and formal restrictions into Level 2.

Estimated savings are provided in the table of Level 1 actions, these are based on previous experience and from industry examples or documented savings.

Where applicable, the actions commenced from the Environmental stress trigger would continue into Level 1.

Table 4. Level 1 Actions

Action	Description	Estimated savings or benefits on peak demand (Ml/d)	Risks and barriers	Implementation timescale	Environmental impacts
Enhanced communications	Use of radio and media for daily messaging.	1.5	Keeping the message clear, customer pushback, ineffective, messaging fatigue.	1-2 weeks lead time	+ive impact reduces demand
Demand management: Enhanced communications	Direct customer contact (email/text message) appealing for restraint.	3	Keeping the message clear, customer pushback, ineffective, messaging fatigue, maintaining savings.	1-2 weeks lead time	+ive impact reduces demand
Demand management: Leakage reduction	Review of leakage position and increased leakage efforts – additional resources.	1.5 - 5	Savings depend on starting position; Diminishing returns; Weather related effects, resource requirement, cost approvals. Exec approval for additional resource; resource/skills availability.	1-2 weeks lead time In place whilst at Level 1 minimum and until policy minimum plus 1Ml/d leakage achieved.	+ive impact reduces demand

Action	Description	Estimated savings or benefits on peak demand (Ml/d)	Risks and barriers	Implementation timescale	Environmental impacts
Enhanced pressure management	Review network to see if changes to pressure may conserve supplies.	1.5 - 3	Low pressure issues on network.	1 week In place throughout.	+ive impact
Prepare to implement TUB	Make preparations for Level 2 implementation	n/a	Board approval	1-2 weeks lead time	n/a
Operational activity optimisation	Review planned outages to essential work only (legal or regulatory driver)	Varies	Essential works cannot be delayed, water quality.	<1 week	-/+ impact increases supply
Maximise Supply availability	Maximise licenced outputs at sources where environmental risk is lowest	Varies	Constraints on sources	1-2 weeks	-/+ environmental risks need understanding
NTN Pumpback	Consider utilising the NTN Pumpback if HOF allows	-	Reliant on the being above HOF level.	1 week	+ive impact in slowing Blithfield levels

Reducing demand

The enhanced communications that we would put in place at Level 1, including potential bespoke and targeted campaigns for which planning would have commenced earlier, aim to achieve similar demand savings expected with a temporary use ban in place but within Level 1, before we may need to officially restrict some water use at Level 2.

Through experience of previous customer campaigns of various types, we estimate that the savings made by reducing demands through Level 1 could be up to 3Ml/d. Many demand management communications actions can be implemented quickly in just a few weeks, and our communications plan maintains an adaptive approach, this allows us to develop more bespoke and targeted communications, particularly leading into periods of typical peak demands such as bank holidays and the summer.

At Level 1 we increase our leakage activities, supported by additional resources and leakage find and repair teams. Actual leakage can vary throughout the year and can be dependent on weather conditions, so additional benefit would depend on the preceding level of leakage. Our ability to implement additional leakage detection and repair activities is in part reliant on how well we can detect more and smaller leaks, as well as our ability to recruit the additional skilled personnel needed at times – although we do have additional resource available to us through existing contractual arrangement. Therefore, we estimate demand savings from additional leakage activity to up to 5Ml/d.

We recognise that to encourage positive action from customers in response to awareness campaigns and calls for restraint we will need to demonstrate that we are doing all we can to manage demand through leakage management. The enhanced communications at Level 1 will therefore include messaging around our own activities to support our appeals to customers to reduce water use.

As Level 1 indicators progress, we would begin planning for the implementation of TUBS during Level 2 to ensure readiness for when they may be required, this will include internal preparation and engagement, including any approvals required at board level.

Actions to increase supply

The amount of additional supply that can be achieved through optimisation of operations and reducing planned work will vary depending on the antecedent situation, however we estimate this would be up to 6Ml/d. This could be greater at times of peak demand when we can utilise greater daily volumes of water, but for a shorter period only, approximately over 3-6 weeks. Our overall flexibility in supply headroom allows us to adaptively vary abstractions for annual and daily volumes throughout the year.

Stakeholder engagement

The stakeholder communications already in place would continue, but with increasing frequency, to both customers and other stakeholders. Previous dry weather and drought sequences have shown that Level 1 conditions can remain in place for many months before escalating to Level 2 or recovery to BAU. Therefore, a carefully balanced communications strategy is required to avoid message fatigue. Through Level 1 the intensity and urgency of messages can be increased as we continue to monitor our drought indicators through this stage; this significant uplift can include appeals for restraint to express the seriousness of the developing situation, although this is usually as Level 2 becomes more imminent. Our levels of service include the need for a major publicity campaign requesting voluntary water through appeals for restraint around once in every 10 years. As appeals for restraint are made, we will start to warn customers of the potential for restrictions on use alongside advice on water efficiency and would begin planning for this as Level 2 status becomes increasingly imminent. The channels that we utilise for communications will be increased, using those with longer lead times at Level 1, such as paid advertising in local media, alongside bespoke campaign messages.

Once at Level 1 status, it is likely that the region will be in a similar position, and situational update meetings with regulators will have been formalised and become increasingly regular. We will also be providing our forward look forecast for drought status to inform the national picture as the situation progresses. These updates will be provided to all stakeholders – including wholesale retailers, NAVs and regulars, usually through the Defra organised National Drought Group forum as a single point of information.

3.6 Level 2 actions

A prolonged dry period leading into drought will most likely lead to our triggers for Level 2 actions and the requirement to consider more serious restrictions. Resources will potentially be constrained at some sources, and measures for further demand management and supply optimisation would be actioned. Where applicable, the actions commenced from the Environmental stress trigger would continue into Level 1, and we would prioritise measures that reduce demand.

On reaching Level 2 we will be preparing for the need of formal restrictions to be applied to our customers, known as a temporary use ban (TUB). A temporary use ban, previously known as a hosepipe ban (redefined under the terms of the Flood and Water Management Act 2010), allows us to make temporary water use restrictions that we can implement without applying to the Secretary of State to do so. Our level of service is to introduce a TUB on water use on average not more than once in 40 years. We would normally apply these to our entire supply area and in alignment with other companies in the region, where it is possible.

A TUB sees greatest benefits during the periods where discretionary water use is high, typically outdoor spring and summer use, therefore crossing into Level 2 will not automatically mean an immediate temporary use ban is implemented. We will review the time of year; overall supply position and weather conditions being experienced. We may choose to delay the imposition of restrictions until a more appropriate time within Level 2 when they will provide most benefit.

We can put a TUB in place at any time when there is a risk to customer supplies, not only in drought situations, although this would be due to exceptional circumstances, and the timing of implementation will still depend on the time of year for ensuring effectiveness and appropriate responses from customers.

Together with the standard exemptions included in the legislation, we can also apply discretionary concessions to TUBs and make exemptions for certain water use activities. We have standardised these with other companies in the region for the sake of clarity for all customers. The approach to TUB implementation is set out in more detail below.

Table 5 below sets out the expected saving associated with TUBs and Level 2 actions. Where applicable, these have also been cross-referenced with the expected savings set out in UKWIR's code of practice and guidance on water use restrictions. The volumes saved do not necessarily represent year-round reductions; they are likely to be more effective for seasonal reductions, by curbing peak demands mainly in the spring through to autumn and maintaining a closer to average demand throughout the year.

Table 5. Level 2 Actions

Action	Description	Estimated savings or benefits on peak demand (Ml/d)	Risks and barriers	Implementation timescale	Environmental impacts
Enhanced communications	Use of radio and media for regular messaging	>9 Ml/d (including Environmental Stress Level savings if applicable	Keeping the message clear, customer pushback, ineffective, messaging fatigue.	In place – continuation as per Communications plan	+ive impact reduces demand
Enhanced communications Demand management	Direct customer contact (email/text message)		Keeping the message clear, customer pushback, ineffective, messaging fatigue, maintaining savings.		+ive impact reduces demand
Enhanced communications Demand management	Direct customer contact (email/text message) appealing for restraint		Keeping the message clear, customer pushback, ineffective, messaging fatigue, maintaining savings.		+ive impact reduces demand
Demand management: Leakage reduction	Review of leakage position and increased leakage efforts – additional resources	Reduces overall demand 1.5 - 5 Ml/d	Savings depend on starting position; Diminishing returns; Weather related effects, resource requirement, cost approvals. Exec approval for additional resource; resource/skills availability.	In place - continuation	+ive impact reduces demand
Operational activity optimisation	Cancel planned outages	Varies, most effective during peak periods	Essential works cannot be delayed, water quality.	<1 week	-/+ impact increases supply
Reservoir support	Brindley Bank augmentation of Blithfield reservoir	<5	Relatively small volume of groundwater with WQ expected to be at least as good as the existing reservoir inflow	1-2 months	low
Implement TUB	Publish formal notices of restrictions	15 – 28.5 Ml/d estimate	Board approval required, public perception, appropriate seasonal timing.	>21 days from publication of notice. (includes 7-14 days for representations)	n/a

Reducing demand

Our existing adaptable communications approach will continue at Level 2, with wider reaching campaigns focusing on informing customers that a temporary use ban is likely to be needed; this will include text and email messages raising awareness of potential TUBs, the changes customers can make to reduce water use and what we are doing to reduce demand though increased leakage efforts. This would continue through the implementation of TUBs, keeping customers well informed of the changing situation and circumstances to be aware of whilst a TUB is in effect.

If drought conditions continue to worsen during Level 2 then as our indicators are reached, we will prepare for additional measures to restrict non-essential use, which apply to non-domestic water use. Non-Essential Use bans (NEUBs) are implemented at Level 3, however from preparation to implementation takes longer than TUBs so this is commenced in the later stages of Level 2, to be ready for application of an ordinary drought order required to implement NEUB if we cross into Level 3.

TUBS have been demonstrated to be significant in making demand reduction, and more effectively than many other campaign activities due to the mandatory nature. The benefits of TUBS are to reduce discretionary water use, predominantly from outdoor activities. Saving from TUBs as estimated by UKWIR research[4] range between 5% and 9.5% of household demands, although our experience from the 2011/12 drought[5] indicates that savings could be more than 10%. More recent research following the 2022 drought carried out by UKWIR[6] estimating a 3.3% - 6.6% saving, using data from six companies. This is an average and peak reductions are not assessed, therefore the impact of reduction on peak demand when TUBS are most effective could be greater. Other estimates of 5-14% have been made by larger water companies, and the 2022 reductions represent a later implementation of TUBS with relatively short-lived benefits of a few months in the year due to quick recovery for that event. The impact of TUBs in 2022 on household consumption was around 6.6%[7]. We are awaiting the UKWIR report reviewing the benefits of TUBs during the 2025 drought. We expect that a saving of 15 – 28.5Ml/d of saving is realistic, based on previous restrictions and available evidence.

Protecting the environment

For the previous drought plan we produced an environmental assessment report which assessed the potential impacts on the water environment from implementing the proposed River Blithe pumpback drought permit. This also identifies appropriate mitigation measures and sets out and environmental monitoring plan to determine the effect of operating the permit. This is being reviewed and updated as required during the consultation period for the plan as per the drought permit action plan agreed with the EA. Any updates will be incorporated into our revised draft plan.

The preparation for applying for permits and drought orders will require the environmental monitoring plans to commence so that the impact of these can be assessed, and minimised, alongside any mitigations that could be required.

Actions to increase supply

Alongside formal restrictions we will continue the optimisation of supplies by halting any planned outages, managing our available abstractions and fully utilising available licences to maximise operational supply capacity. This would include measures to reduce the downtime associated with short term unplanned outages by increasing operational response team resources. Our drought incident team would ensure all preparations are made to mitigate short term unplanned outage caused by asset failure, power failures or treatment shutdowns with increased support for spares, alternatives such as on-site power generation, and ensuring supply chain resilience. It may be appropriate in some cases for

[4] Drought and Demand: Modelling the impact of Restrictions on Demand during Drought, UKWIR 07/WR/02/3
[5] Understanding the impacts of drought restrictions 14/WR/01/13, UKWIR, 2013.
[6] Review of 2022 Drought Demand Management Measures - Summary Report UKWIR 23/WR/02/18
[7] Review of 2022 Drought Demand Management Measures - Summary Report, UKWIR 23/WR/02/18

temporary treatment or assets to be utilised to ensure we maintain maximum supply capacity, for example where water quality can become a constraint on source outputs during periods of low river or groundwater levels.

At Level 2 we would expect to consider the use of all licences at maximum allowed capacity. The use of our maximum licences may be achieved through operational activities or capital investment schemes. These can either be accelerated (scheduled work undertaken earlier than planned) or new (work not currently planned to be undertaken) schemes. Typically, they allow us to abstract and move water to meet demand or increase the output or reliability of our sources. The list below provides a high-level summary of some of the opportunities for capital investment schemes that can potentially be realised from source performance tracking and identification of recommendations.

- Pump deepening, pump replacement or new pump installations to increase output or increase resilience.
- Recommissioning licensed borehole sources not currently in use.
- Other capital works including but not limited to borehole rehabilitation, pipework replacement, valve replacement or upgrading boosters.
- Changes in network configuration - for further maximisation during peak demand.
- Installation of new or additional treatment to overcome a water quality constraint.
- Software updates and upgrades – site control configuration to optimise outputs, e.g. the preferential use of a borehole(s) over another.

The drought management team would also review any future capital schemes, or WRMP options that could be feasibly fast tracked so that lead in times to plan for these can be incorporated into Level 3 actions and the evaluation of extreme drought options at level 3b. This could include source recommissioning, additional boreholes or other feasible upgrades to WTW.

In addition to capital investment works, licence changes could be recommended. In these circumstances, we would need to prove we can achieve the increased output through a pumping test prior to preparing an application to the Environment Agency.

Stakeholder engagement

Once Level 2 drought status is reached, it is likely that the drought will also be affecting neighbouring companies and Water UK will appoint a Drought Liaison Coordinator as an industry spokesperson and single point of national contact. At Level 2 we will provide guidance and FAQs for retailers and NAVs on the current situation and timings for expected implementation of TUBs, so that they can provide consistency with their own drought plans - this will build on the Communications already in place for Level 1.

We will utilise our stakeholder networks to further inform them on the introduction of TUBS, share consistent messaging on restrictions, exemptions and the current and forecast drought situation. Retailers and NAVs will be advised in advance of restrictions once we have certainty of the date so that they are able to update their own communications accordingly. We will commence more detailed communications and updates with retailers and the non-household sector to apprise them of the changing situation and the risk of further restrictions to non-essential use if the drought progresses.

Our customers will be directly provided information on the details of restrictions, timings and exemptions at the same time we publish the statutory notices on our website and in local media, where this is possible using email and/or text messaging. Press releases will be prepared for the wider media.

Temporary use Bans

When considering a TUB, we will follow the requirements laid down in the relevant legislation and UKWIR's code of practice.[8] In particular, we will have regard to the following when implementing a TUB.

- A consistent and transparent approach.
- That water use restrictions are proportionate.
- Clear communications with customers and the wider public/users.
- Consideration of representations in a fair way.

We have adopted a form of notice for TUBs consistent with other WRW member companies in the region This includes the standard exemptions and concessions that would be allowed, which are also consistent within the region. We would normally only implement TUBs during periods when they will reduce demand - for example, in the spring and summer. But this may vary as a drought becomes more serious. We would always implement a TUB before introducing supply measures and drought permits if applicable.

Timing and approach to implementation

We will follow the principles laid down in UKWIR's code of practice when considering how to implement temporary use restrictions. Preparation, internal communication and governance, and liaison with the Environment Agency, regional groups, and neighbouring water companies will have commenced in the latter stages of Level 1. Once we reach the trigger for consideration of TUBs, the drought management team will make recommendations to the board for approval on the exact timing of implementation before publishing the TUB notice.

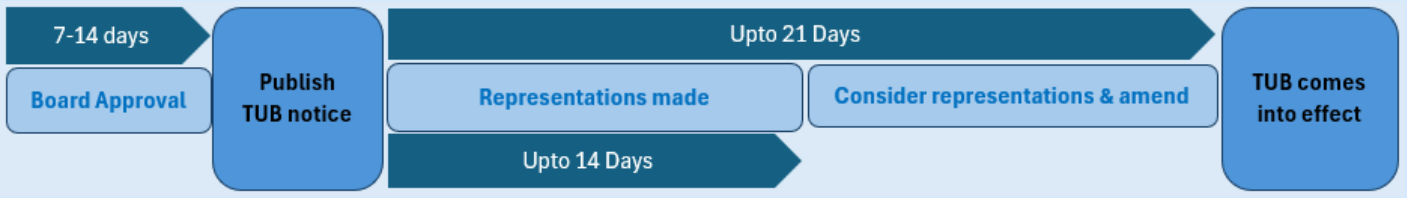
Specific requirements regarding advertising for TUBs are set out in the WIA 1991. Under the legislation set out in section 76B(5) of the WIA 1991 (as introduced by the FWMA 2010) all relevant notifications (relating to TUBs) must be published on the company's website and in two newspapers circulating in the area to which it is to apply. We would, however, use other appropriate channels to communicate the TUBs notice, along with other supporting information through our Communications Plan, such as FAQs on TUBs and how to make representations. The lifting of any restrictions will also have to be notified in the same way, although the lifting of restrictions may take effect as soon as the notice to do so is published. We will provide clear details of how to make representations on the proposed restrictions and give notice in the same way of any changes to the scope of restrictions - for example if new exceptions are allowed.

Once we publish the TUB notice, we will allow up to 21 days from the date of publication to the notice taking effect. We will aim to allow 7- 14 days for representations to be made. The drought management team will consider representations from individuals or groups in a fair and even-handed manner, and any decisions made communicated to both the individual or group and the public. We will also review and consider representations made whilst the restrictions are in effect.

These timescales can be reduced if there is deemed a particular need for more immediate action to reduce demand. The 21 days could be reduced to 7-10 days if required, as long as we comply with the requirements to advertise and consider representations. As TUBS are most effective in spring and summer months, it is unlikely that we would implement them during autumn and winter, and the timing will be an important consideration to ensure that we balance the need for demand reductions. This is so that the impact on customers and the economy with restrictions imposed can be moderated so they are in effect when most appropriate. This is supported by UKWIR research which has identified that savings are less if TUBS are implemented later in summers, and the timing of implementation can be fundamental to the effectiveness, alongside considering the need vs. disruption which is an important factor in deciding when to implement TUBs.

[8] Code of practice and guidance for water companies on water use restrictions 14/WR/33/6

TUB Timeline



Communicating restrictions

Any decision to introduce temporary restrictions will be made following comprehensive liaison with the Environment Agency, neighbouring water companies, WRW and other sectors to ensure a consistent approach across the region. As a drought situation develops, the frequency of these meetings and communications will be increased and joint communications and press releases will be issued, as appropriate for the situation.

Our website includes a drought status statement; this highlights the current water resources situation and how this relates to any potential drought plan actions. While the emerging drought situation may differ for each water company in a particular region, and the timings for implementation of restrictions will depend on the local situation, we will endeavour as far as is practicable, to provide a consistent message to customers. We would expect a national drought management team to be convened for any regionally significant drought and for this to be a primary forum for the alignment of communications and activity by those companies involved.

Any proposal to introduce a temporary restriction will be advertised on our website (www.south-staffs-water.co.uk) and in at least two local newspapers, as set out in legislation. We will make use of additional communication channels, both directly with stakeholders and more generally to customers, such as through social media. We will directly contact NAVs or insets, water retailers for business, and those other interest groups on our stakeholder register. Communications with NAVs and retailers is undertaken from Level 1 trigger status, so that they are fully informed in the lead-up to implementation of restrictions. This will be done through our specific liaison contacts for retailers, and public relations and technical team contacts. A variation, or subsequent lifting, of the restrictions will be similarly advertised, and communicated directly with the groups mentioned above. We will align the timing for implementing and lifting restrictions with neighbouring companies wherever possible.

To provide an audit trail, we will record all actions taken during the process of implementing restrictions. We will deal with any complaints through our normal complaint handling procedure. See appendix B for more detail about our communications plan.

Activities covered by restrictions

The range of water use activities that we can control under a TUB, together with supporting definitions is set out in the notice for TUBs (see appendix D). As set out in UKWIR's code of practice, this notice includes a list of standard exemptions.

We will also the following concessions from the outset of restrictions, these have been agreed regionally with other water companies for consistency:

- Blue badge holders will be included as Discretionary Universal Exemptions to the restrictions.
- The use of a hosepipe to fill or maintain a pond containing fish will be included as a Statutory Exception.

Activities restricted by a Temporary Use ban

Watering a garden using a hosepipe
Cleaning a private motor-vehicle using a hosepipe
Watering plants on domestic or other non-commercial premises using a hosepipe
Cleaning a private leisure boat using a hosepipe
Filling or maintaining a domestic swimming or paddling pool
Drawing water, using a hosepipe, for domestic recreational use
Filling or maintaining a domestic pond 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
A garden includes parks or gardens open to the public, grass verges, grassed areas used for recreation and allotments.

Where other exceptions are proposed, we will state this in the notice, and update it if required following consultation. There are no customer compensation payments applicable in the event of a TUB being implemented.

3.7 Level 3 actions

Reaching drought trigger Level 3 will mean we are in a significant drought situation. We have not had the need to resort to Level 3 actions in the history of the company, and our Levels of Service are for this to occur no more than once every 80 years. River flows are likely to be very low, with many reaches completely dry. This would have serious implications for ecological populations and recovery from this will take some time.

At Level 3 we would be preparing to implement our drought permit, and considering the need for a drought order. Actions at this level are intended to reduce risks to supply caused by the drought, whilst maintaining environmental actions already in effect. We will actively and extensively engage with our customers and other stakeholders to ensure they are aware of the seriousness of the situation and will keep them updated regularly and would also be liaising with regulators and national/regional groups.

The actions set out under the previous trigger levels will be kept under review and will continue as appropriate through the development of a drought, including environmental monitoring to ensure we can mitigate impacts on the environment where possible.

At Level 3 we are likely to need to implement non-essential use bans in addition to the temporary use ban restrictions on our customers, although this could also depend on the time of year and any associated potential savings. The preparation and application to implement a NEUB will have mostly be completed within Level 2 as monitored conditions indicate potential to meet the Level 3 triggers, so at Level 3 we are able to apply the drought order at an appropriate time following approvals to go ahead.

Table 7. Level 3 Actions

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
3a. Apply for drought permit	This will allow abstraction from the River Blithe when River Trent flows at North Muskham are below 2,650Ml/d. Volume based on available water in Blithe and assumes that an equivalent volume can be safely abstracted from Blithfield Reservoir.	23 Ml/d	Dependent on time of year – only available when HOF invoked. All permits require EA approval – risk these will not be approved.	1 week for pre application, then 12 days for EA review.	Environmental assessment to be completed as part of permit application.

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
3a. Finalise NEUB	Consider any feedback on NEUB application and gain board approval to implement.	N/A	Board Approval; application to Secretary of State, approval from Defra, stakeholder consultation, consideration of and response to representations.	2 weeks lead time prior to application for drought ordinary drought order. 28 days for Secretary of State to determine application. Up to 3 months from trigger to implementation Duration up to 6 months with 6 monthly extensions available.	N/A
3a. Implement NEUB	NEUB comes into effect.	15 Ml/d	Board Approval; application to Secretary of State, approval from Defra, stakeholder consultation, consideration of and response to representations.	As above	Economic impacts. Applications for compensation Increased PR and press coverage.
3a. Prepare for drought order	Preparation for R Severn drought Order		Board Approval; timings 3-6 months		n/a
3a. Maximise Supply availability	Consider acceleration of capital schemes where feasible, including mothballed groundwater sites	varies	Resources, cost, permits/licences, planning.	considerable	-/+ depends on options
3b. Maximise supply availability	Operate Blithfield within emergency storage.	6 Ml/d to 30 Ml/d	Water quality risk at lower levels. Impact of sedimentation on water quality, pumps & infrastructure, and treatment process.	1 week – drought management team to approve this option.	Negligible environmental risk associated with lower reservoir levels.
3b. Implement drought order	Implement R Severn drought order	>24Ml/d	Board Approval; application to Secretary of State, approval from Defra, potential for hearings or enquiries	3-6months	Environmental assessment and monitoring to be completed as part of permit application.
3b. All possible options to avoid emergency drought orders	Extreme drought options	Varies – see extreme options section			

Actions to reduce demand

Further formal restrictions on water use can be made through a Non-Essential Use Ban (NEUB) which allows us to further restrict non-essential water use at commercial and institutional premises under the Water Resources Act 1991 Sections 74(2)(b). Under the legislation set out in section 76B(5) of the WIA 1991 (as introduced by the FWMA 2010) For this we must apply to the secretary of state for the approval of an ordinary drought order, as per sections 73 and 74 of the water resources act 1991, and the secretary of state must be satisfied that a "serious deficiency of supplies in an area" exists, by "reason of an exceptional shortage of rain". Specific requirements regarding advertising and consultation for Drought Orders are set out in the legislation.

In our plan we do not propose to use any other ordinary drought order provisions within section 74 that may have an impact on the environment, such as taking water from any source subject to conditions, or suspending or modification of restrictions relating to abstraction of water. Non- essential use restrictions are more wide-ranging than those included in a TUB and in addition to domestic customers, these restrictions would also affect commercial customers and businesses.

The range of purposes to which ordinary drought orders apply are as follows:

- Watering outdoor plants on commercial premises.
- Filling or maintaining a non-domestic swimming pool or paddling pool.
- Filling or maintaining a pond for ornamental use.
- Operating a mechanical vehicle washer.
- Cleaning any vehicle boat aircraft or railway rolling stock.
- Cleaning non-domestic premises.
- Cleaning a window of a non-domestic building.
- Cleaning industrial plant.
- Supressing dust.
- Operating automatic cisterns in unoccupied or closed buildings.

Before submitting an ordinary drought order application, we would discuss the need for such a measure with Defra as well as the Environment Agency and we would make sure that TUBS are being as effective as possible. The application process requires us to state the reasons and present our case for the need for restrictions including how an exceptional shortage of rainfall is likely to lead to a serious deficiency in water supply. Following our application, if any objections are received, the Secretary of State would hold a local inquiry or hearing unless they consider that the drought order must be made urgently.

Considering the timescales involved in preparing an application and granting an order could take 3-6 months; experience from previous droughts suggests 3 months from advertising the intention for a drought order to receiving notice of the order, and our triggers reflect the time required with planning for a drought order commencing in Level 2 for timely implementation at Level 3. As with TUBs, the timing of NEUBs being implemented will be considered as the time of year will influence how effective they are vs. the impact on commercial customers.

The stages required to implement a drought order are as follows:

1. Preparing and lodging an application. This includes publishing adverts in the press, followed by an application to the Secretary of State, including reasons for requiring the drought order, supporting evidence and information. There is a seven-day period for objections to be made.

2. Hearings or inquiries. If any objections are received, the Secretary of State will hold an inquiry or hearing. A seven day period is required to advertise the hearing.

3. Implementation. Once approved, the water company must again advertise the implementation of the granted drought order. It is not possible to be any more specific here on exemptions and concessions, as the range of drought order restrictions will vary according to the specific circumstances of a particular drought. However, we

will follow the requirements of the relevant legislation and guidance. This includes Defra's guidance on drought permits and drought orders[9] and the principles laid down in UKWIR's code of practice. This is to ensure that our proposals are consistent, proportionate, and clearly communicated, and that any objections are considered fairly.

Drought orders and permits

Drought orders and permits give us additional flexibility to manage our water resources for water supply. The Environment Agency can grant drought permits[10] to allow us to take additional water from sources, by modifying or suspending of conditions on, an abstraction licence.

Drought Permit

We have a drought permit that would allow abstraction from the Blithe to support reservoir storage at Blithfield, at times when the existing abstraction licences would normally be restricted – the 'River Blithe pumpback' permit. This is a licenced abstraction which is subject to conditions that restrict abstractions. The current hands-off flow is set at 2,650Ml/d on the River Trent at North Muskham (near Newark) and effectively means that during drought periods the abstractions cannot be used for large parts of the year. There are 2 types of conditions under which we would consider this drought permit.

- Once Level 2 trigger curve has been crossed at Blithfield Reservoir, we will consider the requirements for applying for a drought permit to allow the Blithe abstraction to continue regardless of the flow at North Muskham, so that this can be implemented at Level 3. As with all drought permits, we will need to demonstrate that this is required in response to a period of exceptionally low rainfall, when compared with the available historic data, and to have maximised the benefit of demand restrictions as appropriate for the time of year.

- We will also consider applying for a drought permit on the Blithe should storage at Clywedog fall below the Level 1 trigger. However, this assessment will take account of storage at Blithfield Reservoir, and it is unlikely we would act immediately after the Level 1 trigger was crossed. Under these circumstances, it is likely that we would defer a drought permit application until Blithfield Reservoir storage was closer to the corresponding Blithfield trigger, but we would look to prepare the pre-application at this stage to ensure swift application if required.

We have also included two options for a drought order at the River Severn Works in this plan.

Drought Orders

The River Severn is a regulated river that is managed by the Environment Agency. Releases from Lake Vyrnwy and Clywedog Reservoir, and abstraction from the Shropshire Groundwater Scheme, are used to maintain the flows in the river. Under the current control rules the Environment Agency is required to maintain a flow at Bewdley of at least 850Ml/d (as a five-day average), with a minimum daily flow of 650Ml/d

The abstraction licence at the River Severn Works is restricted when the River Severn is under River Regulation (when water is being released to support the river), and when the Environment Agency has implemented its own drought order on the River Severn (this requires a 5% reduction in abstraction licences on the river).

An application for a drought order at the River Severn Works would only be considered as a last resort, once all other drought permits had been implemented, and would be in response to extreme conditions. The need for a drought order at the River Severn Works could occur if:

- the storage level at Blithfield Reservoir was below the Level 3 trigger.
- the Environment Agency has implemented its drought order on the River Severn; or

[9] Drought permits and drought orders, Defra, May 2011, www.gov.uk.
[10] Granted under the Water Resources Act 1991, Section 79a, as amended by Environment Agency 1995

- maximum river regulation has been in force and the abstraction licence capacity at the River Severn Works is restricted to 192Ml/d.

A period of at least six weeks maximum regulation has been identified as a trigger to consider our drought orders.

- Under the first option we would consider applying for a drought order which would enable a 5% increase in abstraction licence (that is, to restore the level of abstraction permitted before the Environment Agency drought order). This would restore the output of the River Severn Works to 192Ml/d.

- Under the second option we would consider applying for a drought order to increase the level of abstraction of raw river water up to 216Ml/d. This would enable us to conserve bankside storage reservoir levels and allow full use of maximum treatment capacity at the River Severn Works during the critical drought period. It is also possible that the second option may be required during implementation of an Environment Agency drought order and this has been used to define the maximum environmental impact case.

A drought order is required, rather than a drought permit, because of the environmental sensitivity of the river, the likely conflict of interest on behalf of the Environment Agency as a drought order applicant, and because of the large number of stakeholders that could be affected. A drought order application would be determined by the Secretary of State or Welsh Ministers. We would bring in this option in at Level 3 as we consider it to be a drought action with environmental impact based on the environmental assessment completed.

Application for a drought permit

The application for a drought permit needs to satisfy the Secretary of State that, by reason of an exceptional shortage of rain, a serious deficiency of water supplies in any area exists or is threatened. The evidence for this is site specific and analysis of the monitoring data is used to demonstrate that the dry weather requiring an application is unusual within the historic record.

To apply for a drought permit, there is a clearly defined process we must follow and is set out in table 6 below

Table 6. Drought permit process

Stage	Description	Timescales	Who involved
Drought permit application preparation	Detailing the proposal and articulating the need. This pre-application will include comprehensive details on the actions taken already (particularly focusing on demand-side options) and how successful these measures have been, and the savings identified as a result.	Start within Level 2. 14 days to complete	EA Other key stakeholders
Application Submission	Involves sending the formal application to the EA, as well as serving notice on any specified bodies. At this stage the notice will also be published which could lead to a hearing if objections are received.	1 day	EA Statutory consultees e.g. Natural England
Determination of Application	EA will determine whether the application is to be granted.	12 days – however Natural England have up to 28 days if the application has the potential to damage features of a statutory designated site under the Habitats Regulation or Wildlife and Countryside Act.	EA

Stage	Description	Timescales	Who involved
Resulting Actions	If drought permit is approved, then the necessary actions can be put into place to progress. If drought permit is refused, assess alternative options.	2 days	

This option is intended to assist with refilling the reservoir, and as such we wouldn't look to use this during summer months, instead it would deployed in autumn and winter months moving into the following calendar year. This also has the benefit of observing climatic trends moving out of summer to determine if the permit will still be required. Our drought order on the R Severn and the timing of applying for these measures is not directly linked to our triggers at Blithfield but can influence some of the decision that we make in managing the reservoir during drought.

Application for a drought order

The stages required to implement a drought order are similar to those for an ordinary drought order as follows:

1. Preparing and lodging an application. This includes publishing adverts in the press, followed by an application to the Secretary of State, including reasons for requiring the drought order, supporting evidence and information. There is a seven - day period for objections to be made.

2. Hearings or inquiries. If any objections are received, the Secretary of State will hold an inquiry or hearing. A seven day period is required to advertise the hearing.

3. Implementation. Once approved, the water company must again advertise the implementation of the granted drought order. It is not possible to be any more specific here on exemptions and concessions, as the range of drought order restrictions will vary according to the specific circumstances of a particular drought. However, we will follow the requirements of the relevant legislation and guidance. This includes Defra's guidance on drought permits and drought orders and the principles laid down in UKWIR's code of practice. This is to ensure that our proposals are consistent, proportionate, and clearly communicated, and that any objections are considered fairly.

Actions to increase supply

By Level 3 we will have utilised available options to increase supply, and will be exploring any additional feasible options, these will include extreme drought options and accelerating any schemes that we might have in our capital plan or WRMP. However, it is likely that the lead time for many of these, which is accounted for at Level 2, could be many months.

By the time a drought has reached the severity of level 3 actions it is possible that some of our groundwater sources would be restricted by groundwater levels, pumping and abstraction assets. A key area for supply would be maintaining the outputs where these issues could arise, and this could involve changing assets, for example lowering pumps or installing temporary treatment to address changes in water quality or increase outputs. The feasibility of these would have been considered at level 2 so that in level 3 we can progress with any that would provide supply benefits.

Operating Blithfield Reservoir at low levels

Our drought curves indicate that the dead storage level of Blithfield Reservoir is at 25%, based on the highest intake for the take-off for our WTW. Dead storage represents the level of storage below which it is difficult to abstract water because of the hydraulics of the system, and the quality of the water would decline to such an extent that treatment may have to be curtailed at times. Some initial investigations imply that we may be able to safely draw down below this level, but at the expense of a reduced summer peak abstraction rate and increased outage risk to the treatment process. Further work needs to be completed to understand the full potential of this, and we will not have certainty of the benefit until we are in that situation.

The emergency storage curve is 4% above the dead storage curve. This water will only to be used as a last resort and is a buffer before dead storage is reached. Because of the lack of certainty, we would only consider using this option in extreme droughts as a Level 3b option, when various demand restriction measures are already in place.

Actions to protect the environment

If a drought becomes prolonged, for example if at least Level 2 conditions continued over 2-3 years, then there may be an increased risk of groundwater body deterioration. Regulation 13 of the water framework directive requires the prevention of deterioration in status of groundwater bodies. Whilst we do not believe that we would need to abstract above the recent actual volumes for the assessment of deterioration risk, we have peak licences available that we can use during a drought within annual licences. Once in Level 2 for 2 consecutive years (or seasons for a multi-year drought), we would monitor several OBHS identified in our groundwater trigger assessment more frequently to assess deterioration risk and take any measure required to prevent deterioration. If necessary, we would apply Regulation 18 allowing a temporary deterioration in status and outline the measures that we would have taken prior to any deterioration, and those to restore the status through recovery of the waterbodies.

Stakeholder engagement

There would be significant engagement with multiple stakeholders at Level 3, with the majority of this via national or combined groups. Our Drought management team will inform these groups, as well as supporting direct communications as necessary. We would have internal briefings as well as external communications on at least a weekly basis to ensure that all affected operational teams and stakeholders are fully apprised of the situation, and of any changes.

Key stakeholders at Level 3 are retailers and NAVS as the non-household and commercial sectors would be impacted if NEUBs are implemented. Whilst this would have commenced at Level 2, the engagement in Level 3 would shift to the impacts of restrictions and our regular meetings with this sector would be supported with a dedicated internal stakeholder representative, to ensure that our plan is aligned with retailers/NAV plans and that actions are being applied consistently.

3.8 Level 4 actions

The water resources and climatic indicators associated with the Level 4 trigger have not been reached in the historic data records and are therefore extremely unlikely and would represent an unprecedented extremely serious drought of a magnitude not previously experienced. Our level of service for the risk of rota cuts or use of standpipes is on average less than once in 500 years.

At Level 4 we can resort to the use of Emergency Drought Orders that would allow us to further prohibit water use through rota cuts, and to supply water through standpipes or water tanks. Details of Level 4 actions will be included in a future Emergency Drought Plan (EDP) which would supplement our existing emergency planning arrangements. The first drafts of these EDPs will be published for review by the Environment Agency in the summer of 2026 and will be integrated into the revised draft and final drought plans. These emergency plans would be invoked by the Drought Management incident team for Level 4, together with an Incident team. We may seek additional support under the Civil Contingencies Act to avoid rota cuts and standpipes being required. Drought plan guidance confirms that drought plans do not need to include details of arrangements for providing water supplies to cope with situations when there is a civil emergency because of water shortage.

4. Extreme drought actions

The drought management actions outlined in this plan would allow us to manage a progressive drought sequence like those historically experienced and beyond into a more severe drought not experienced before. We have identified several further actions that would be available to us typically at Level 3b, which are technically and practically feasible. Many of these would be temporary and not constitute a permanent increase to supply or deployable output.

1.1 Options considered

Extreme drought actions would only be considered for use where we have implemented all our previously detailed actions, yet the severity of the drought is progressing.

For example, in addition to the drought permits and orders already described, we would also explore the full range of actions included within the ordinary drought order legislation (section 74(2) of the Water Resources Act 1991). These include applying to:

- take water from any source specified, subject to conditions.
- prohibit or limit the use of water for any purpose specified.
- discharge water to any place specified subject to restrictions.
- prohibit or limit taking of water by an appropriate agency; and
- suspend or modify restrictions relating to abstraction, discharge, supply, filtration of water

Drought orders to restrict water users

We do not believe that restricting other abstractors would provide any water resources benefit. There are relatively few large-scale consumptive abstractions upstream of Bewdley on the River Severn, our main shared abstraction resource. Restricting these abstractions will not have any material effect on the licence condition at the River Severn Works. Similarly, restricting the abstractions downstream of Bewdley will not impact on the Works (given that Bewdley is the licence control point). There are no other significant direct consumptive abstractions associated with the Blithe or Blithfield reservoir, which could be reduced to improve our resource position. There are some large non-consumptive abstractions along the major rivers from which we abstract. These are used for purposes associated with the conventional generation of electricity from coal and gas. As a major electricity user in the treatment and distribution of potable water, it would serve no useful purpose to us if these generators were affected by drought orders, and non-consumptive abstrcations would have limited resources benefit.

Most of our groundwater abstractions are not constrained by pumping water levels, so there is no scope for reductions in third party abstraction to improve groundwater deployable output (even if there were abstractions nearby). In addition, we are conscious of domestic private supplies, businesses and farms that rely on their own water sources for essential use such as drinking and watering livestock, and restricting these would serve no purpose. Should their own supplies fail, we would support on a best endeavours basis, but our public water supply customers will be prioritised.

Groundwater drought permits

Increasing groundwater output over the full drought period (peak season) can be achieved by use of peak daily conditions on our licences. We would then seek to re-balance the total licence volume after peak demand season to meet the annual average licenced volume. Where ten year rolling groundwater licences are also in place these conditions would still be adhered to. Reduction of groundwater abstraction at low demands and in subsequent normal years will offset the use of peak licences.

We have been working with the Environment Agency to investigate our sources for causing risk of causing deterioration as defined by the Water Framework Directive (WFD). Future licence reductions are included in our WRMP to ensure we do not cause deterioration and as a result, we have no proposals for groundwater related drought permits within this plan. We are exploring the potential to develop a drought permit at one source where licence reductions have already been made, through environmental assessments included in an action plan in agreement with the Environment Agency.

Emergency groundwater drought sources

We would also explore bringing back sources which we have not used for several years. These 'mothballed' sites include:

- Sandhills,
- Shenstone; and
- Hulme Springs.

Because these sources are still included in our abstraction licences, we would not need drought permits. However, to use these sources we would have to ensure that the infrastructure and treatment process was still appropriate for providing compliant water supply. In preparation for returning these sources to supply, we would undertake pump tests to ascertain the yield, water quality and treatment requirements. This would be commenced at level 3a for these sources to be available at Level 3b and 4, once all demand measures were in place. In addition, we would need to assure ourselves and the Environment Agency that using these infrequently as an extreme drought measure would not represent a sustained increase in abstraction and would have no adverse impacts on the environment. The long lead in time to makes these sources available for use means they would only get used if there was both an extreme drought and one that persisted for a long period, certainly longer than 12 months.

Other Drought permits/orders

We consider the potential drought order on the River Severn as an option of last resort and falls into the category of a more extreme permit.

Other options we have considered are summarised in table 8 below. Where these would require a drought order or permit application, we have carried out some environmental assessment in advance to provide an early indication of the measures that might be required – for example, mitigation, monitoring or recovery activities. This enables us to understand when the likely triggers for these options with a lead-in time are likely to be, later into Level 3 drought and before Level 4. These would be considered for the entire WRZ, although some may be more appropriate to specific demand centres, which would be assessed at the time.

Table 8. Extreme drought options (Level 3b)

Type of action	Summary	Estimated savings Ml/d	Risks and barriers	Likely trigger timescales	Environmental impacts	Priority (1 to 5)
Demand actions						
Removal of exemptions	Removing exemptions from TUBs/ NEUBs	0.6-1.5	negative PR from restricting use from disabled and/ or vulnerable customers, disproportionate impact for savings. Health and safety concerns	6-8 weeks	none	1
Tariff changes	Higher tariffs for use over an allowed threshold, reward or incentive schemes for reducing per capita consumption	1.5-3.0	Customer acceptability. Financial regulatory approval, voluntary only and therefore negligible savings over communications and awareness campaigns	3-6 months	none	2

Type of action	Summary	Estimated savings Ml/d	Risks and barriers	Likely trigger timescales	Environmental impacts	Priority (1 to 5)
Media and communications	Hard hitting messages - Social unacceptability of excessive water use, prosecutions for breach of TUB or NEUB restrictions, Day Zero language	1.5-3.	Water efficiency messaging fatigue, unpopular messages negative feedback backlash, unwillingness to change	2-3 weeks	none	5
Relocation of water users	Relocate certain commercial large users, such as farm stock or other business to area without drought impact	>20	Feasibility on engaging with other sectors (farming, manufacturing), scale of compensation, feasibility of relocating, availability of water resources elsewhere	3-6 months	Carbon costs	1
Shut down of manufacturing/ large users	Appeals for commercial large users to cease water using activities	>10	Feasibility on engaging with other sectors (farming, manufacturing), scale of compensation,	3-6 months	none	1
Non-potable use	Capture of water for re-use at scale or in domestic setting, rainwater capture systems to prevent losses	1.5-3.0	Volume for re-use, purposes appropriate for non-potable use, water quality concerns, health concerns. Resources and assets to deploy and effectively use. Meteorological reliance.	3-6 months	none	3
Supply actions						
Transfer/trades with other companies	Short term transfers or trades with neighbouring companies or other sectors	0	Transfers with other companies would already be explored to capacity if resource available. Other sectors would require infrastructure and treatment, unlikely to be from a more drought resilient or secure resources. Water availability	1-3 months	low	4
Re-commission mothballed Sources	Re-introduce emergency groundwater sources not currently in supply at Sandhills, Shenstone and Hulme Springs.	Hulme Springs 2-5Ml/d Sandhills >7Ml/d Shenstone >5.5Ml/d	Requires significant investment into infrastructure and WTW. Procurement, and construction lead times. Aggregate licence conditions apply. If flow River Churnet falls below 78Ml/d licence conditions state if Hulme Springs has exceeded 11.86Ml/d compensation flows of 0.87Ml/required at Crumpwood until notification from the EA. Combined rate at Hulme	3-6 months	Condition for R. Churnet on Hulme Springs licence for compensation release to support flows	1

Type of action	Summary	Estimated savings Ml/d	Risks and barriers	Likely trigger timescales	Environmental impacts	Priority (1 to 5)
			Springs & Crumpwood max 11.86Ml/d			
Tankering	Moving water from areas with surplus and injecting into networks or storage	0.5-1.0 (per location depending on capacity	Water availability, road tanker availability sea tankering arrangements, transportation and resourcing issues, Water quality concerns, limited localised benefits	1-3 months	Carbon costs	2
Effluent re-use	Redirecting discharges to supply for potable or non-potable use	varies (per location)	Infrastructure requirements, liaison with WWTW operators, water quality, perception, treatment requirements.	3-6months	moderate	3
Network changes	Overland or temporary pipelines for new supplies	<5	Resource availability, water quality and treatment requirements.	1-2 months	low	3

5. Customer communications

This section explains our approach to customer communications during an emerging drought. Customers include domestic customers, commercial customers, retailers, regulators and other stakeholders. The approach we describe has adapted and developed as we gain insights into what works best, and it remains an agile and adaptive plan to achieve the best outcomes.

5.1 Overview

Effective communication is an essential part of drought management, and we recognise the importance of keeping stakeholders and customers informed, before, during and after a drought. Our communications plan aims to ensure all stakeholders and customers are aware of the drought situation, our plans and actions throughout a drought, and to maximise the demand management savings that can be achieved by implementing actions. The types of communications tools that we use, stakeholders and audiences is set out in our Communications plan in Appendix B and within this plan against actions for each drought level.

A key message that we are committed to always convey is the need to use water wisely and efficiently, and this message is shared during business as usual, with an increasing level of activity, engagement and information with stakeholders and customers as a drought progresses. We will use a variety of methods to communicate messages as deemed appropriate by the drought management team.

The objectives of the communications plan are to:

- Make the public aware of a developing drought situation and keep them informed of the measures that we are planning, explaining the need to save water and our efforts to encourage customers to help.
- Link the risks of drought with the environment, the impact that it can have and how customers actions to save water can directly help the environment.
- Provide information on and promote escalated water efficiency messages to mitigate the need for restrictions, and reduce demand, lessening the likelihood of further restrictions.
- Inform customers of any restrictions that we may deem necessary to implement during a drought situation, in advance of implementation, information on when they will happen, possible exemptions, and the impact of their efforts.
- Manage the timing and targeting of communications as stages of a drought progress.
- Provide a concise and consistent message relating to drought for all water consumers in the affected area, by working with neighbouring water companies, and regional and national groups.

Our communications strategy is not meant to be prescriptive; rather, it is an adaptable and agile framework.

For a drought with more widespread impacts, the Environment Agency, National Drought Group, WRW and others will co-ordinate additional communications at a national and regional level – our drought management team will feedback into these organisations.

5.2 Communications Plan triggers

The activities described in our communications plan are linked to the drought triggers set out in the table below. The actual messages and channels we will use are flexible and can be adapted as appropriate at each stage of a drought.

Table 9. Communications Plan actions

Drought Level	Messaging	Implementation time
Normal	Business as usual (BAU) • Proactive water efficiency awareness and education.	Ongoing
Environmental Stress	• Situation assessment and status – potential to worsen. • Enhanced water efficiency promotion, e.g. promotion of switching to a water meter, thinking about how much water is used in certain activities and whether they are necessary. • What we are doing to manage demands and protect the environment, e.g. our leakage commitment. • Engagement with local site managers and interest groups.	1-2 weeks
Trigger Level 1	• Situation assessment and status – increasing severity. • Continued promotion of water efficiency, switching to a meter, water use in certain activities, and highlighting water wastage. • What we are doing to manage increased demand and protect the environment - and how customers can help. • Leakage levels and updates on demand and demand management effectiveness. • Enhanced metering campaign. • Updates on Blithfield levels and license position. • Appeals for restraint, highlighting the potential for temporary usage bans. • Updates on environmental support schemes.	From one week, up to four weeks, depending on activity being implemented.
Trigger Level 2	• Situation assessment and status – increasing urgency of messages. • Implementation of a temporary usage ban. • Updates on what activities are and aren't prohibited in the region. • Further appeals for restraint on excessive water use. • What we are doing to manage demand and protect the environment. • Leakage levels and updates on demand and demand management effectiveness. • Continuation of metering campaign. • Bespoke education, advice and awareness visits. • Updates on Blithfield levels and license position.	From one week, up to four weeks, depending on activity being implemented.
Trigger Level 3a	• Situation assessment and status – increasing urgency of messages. • National messages on usage restrictions and activities. • Consultation for the ordinary drought order. • Information on implementation of non-essential use, activities restricted, exemptions, compensation arrangements. • Updates on regional and national water resource position. • Implementation of ordinary drought order NEUB. • Environmental urgency, day zero type messaging. • Implement drought permits – stakeholder and regulator communications. • Prepare for emergency drought order (EDO)Impacts of rota cuts.	Up to one week.

Drought Level	Messaging	Implementation time
Trigger Level 3b All possible actions to avoid EDOs	• Updates on regional and national water resource position. • Environmental urgency, day zero type messaging. • Impacts of rota cuts, standpipes. • Explore extreme drought options – stakeholder engagement.	From one week, up to four weeks, depending on activity being implemented.
Trigger Level 4 Drought Emergency Plan	• Emergency Drought Order – National and Government-led messaging.	From one week, up to four weeks, depending on activity being implemented.
End of Drought	• Consultation and liaison on the relaxation/ withdrawal of any ban. • Proactive water efficiency awareness and education. • Thanks to customers for their efforts. • Information on the effectiveness of measures and water savings.	Within one week

Vulnerable Customers

We are mindful of the importance that we communicate to our customers in vulnerable circumstances and provide additional support when needed. Our priority services register is designed for customers with particular needs relating to their water use. The register enables us to identify households with additional communication needs and get in touch with customers using the most appropriate method, to ensure they are aware of and fully understand the situation. These communications will be utilised in the event of needing to implement temporary use restrictions, and will help to ensure those customers understand what the restrictions mean, and more importantly in which cases they will be exempt. We have FAQs that are tailored for more vulnerable customers. Most activities restricted under temporary use bans (TUBs) or non-essential use bans (NEUBs) have associated exemptions for health and safety reasons, which in many cases includes use by customers on our priority services register.

Retailers and non-household customers

Our communications strategy recognises the importance of working collaboratively with retailers and NAVs so that they are informed of the water resources situation, and the current drought plan status so that they can align their own plans and communications to customers. We will work with retailers and NAVs through national (WaterUK) liaison contacts as well as directly as required. If we reach the triggers for restrictions in our drought plan, then the level of coordination will increase with more regular liaison.

As part of our commitment to retailers and NAVS we will provide the following:

- Regular updates on the water resources situation, monthly then weekly as a drought progresses.
- A dedicated liaison single point of contact for any issues arising following drought plan activation.
- Access to our tailored water efficiency information and FAQs on TUBS and NEUBs.
- Industry specific advice and water using data for reducing demand in the non-household properties sectors.
- Data analysis of consumption patterns and targeting high use customers.
- Advance notice of the need for any restrictions so that drought plans can be aligned.

Measuring success

We will use available data to determine and validate the success of water saving actions throughout a drought. The data used will vary depending on the severity of drought and how far we have progressed through the drought triggers, but would include:

- Overall customer demand vs typical and antecedent conditions.

- District Metered area (DMA) demand reductions vs typical.
- Customer meter readings.
- Retailer and non-household customer meter readings.
- Data loggers deployed into high water use areas or for large water consumers.
- Water balance consolidation.

Monitoring the reach of our communications

Depending on the method of communication deployed, there are various levels of qualitative and quantitative data that can be used to determine the reach of our communications. Where we are using customer contact details provided to us, we can quantify the number of messages sent out but not measure the direct benefit of these. Other channels such as those online, allow us to determine the reach of the messages and how engaged the interactions are, for example where links are followed or media messages shared.

We can also undertake customer research and surveys that complement our usual outreach programmes which include specific questions to customers on how we performed during a drought and how the communications messaging landed. This can also be a useful indicator of the effectiveness of our communications during a drought, but these do require some specific planning to be rolled out and may be most appropriate for a more significant drought event with wider impacts and requiring more intense communications. We may do ad hoc quantitative feedback requests on our email communication to understand whether our messaging is appropriate.

6. Environmental assessment

This section explains the environmental requirements and expectations for a drought plan in the guidance and in legislation. It sets out the environmental monitoring that we would plan to undertake during a drought, how our drought actions could impact the environment and what mitigation we would put in place.

6.1 Overview

To ensure minimum environmental impact from our drought management actions, we monitor and assess the impact of some of these activities. The Environment Agency provides guidance on the recommended approach[11], which we have applied to our plan. We consider that the environmental assessment primarily applies to supply-side options as demand-side measures are thought to have a beneficial or negligible environmental impact.

We have assessed the likely impacts on the environment of implementing the actions within this drought plan in consultation with the appropriate competent authorities where required. This includes details of any likely changes because of our actions to water flows and levels, WFD ecological status, designated sites, priority habitats and other protected areas. Designated sites include Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), and Local Nature Reserves (LNRs). The use of abstraction licences over and above recent volumes up to full licenced abstraction volumes has been identified as a risk to achieving WFD objectives through the WINEP and our WRMP.

6.2 Environmental Assessments

We have followed the Environment Agency's guidance on environmental assessments, identifying likely changes to flows and impacts from our supply-side actions on the environment and assessing the sensitivity any likely impact. This follows the approach set out in the guidelines shown in figure 5 below. We have also produced Environmental assessment reports to accompany the River Severn drought order and the River Blithe drought permit, which were updated in 2021, and for the River Blithe is being reviewed for our revised draft plan.

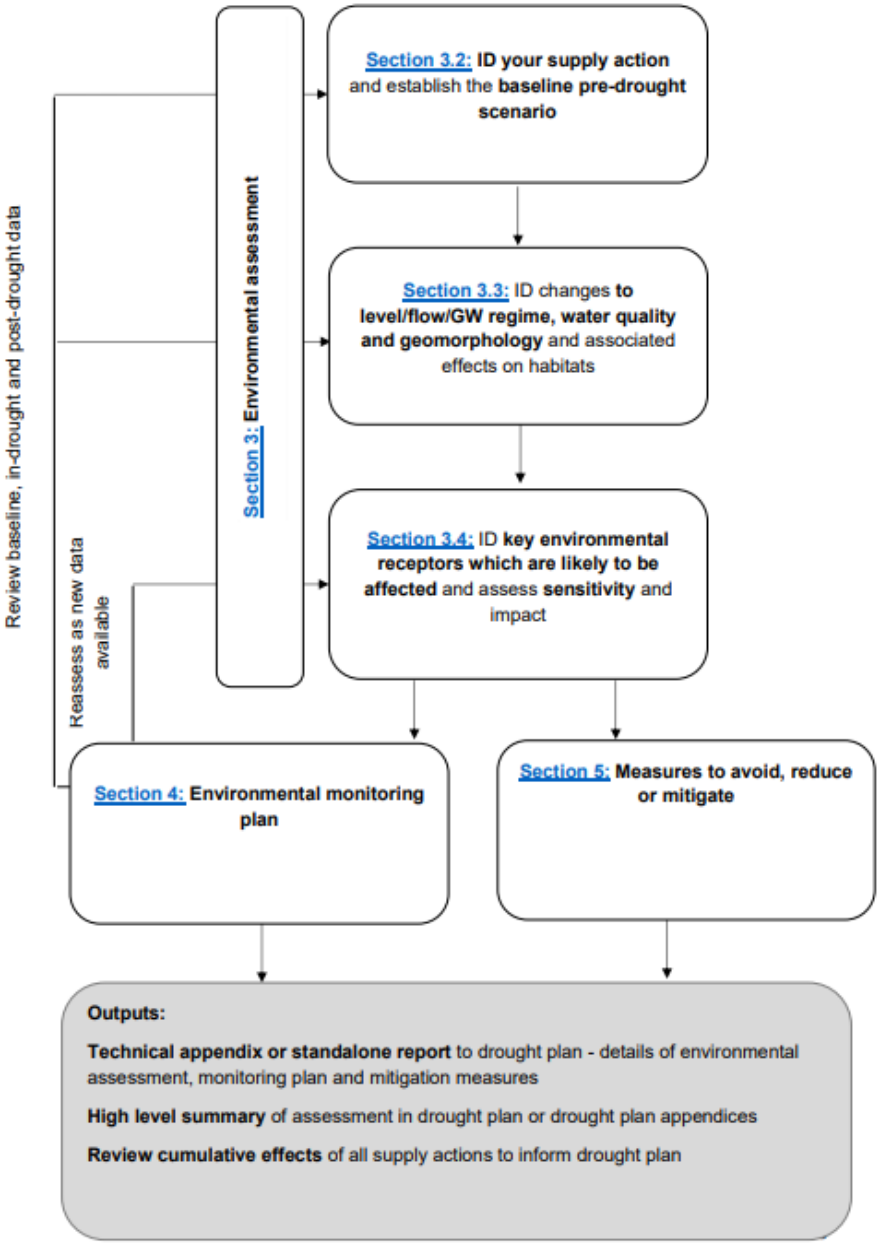
This drought plan includes an assessment of:

- the likely impact of implementing supply-side options,
- the likely impact from the increased use of existing licences,
- details of permits required to implement any options,
- the risks of implementing any supply-side options, and
- monitoring and mitigation actions required for any drought management action.

As a result of our assessments, we have produced several environmental reports and monitoring plans to support our drought permits. to assess the impact of implementing our supply-side actions. These drought actions are expected to be required at Level 3 and will be implemented in a manner to minimise environmental risk. We have considered the likelihood and frequency of drought management actions occurring, together with the level of environmental impact they may cause by assessing the available data and taking account of the sensitivity of receptors, such as designated or protected sites and features. We would always endeavour to implement demand management, in particular TUBS before any drought permits or orders are considered.

[11] Environmental Assessment for Water Company Drought Planning, Supplementary Guidance, Environment Agency, 2025.

Figure 5. Approach to environmental assessment



Source: Environmental assessment for water company drought planning – supplementary guidance, Environment Agency, September 2025.

We do not consider that our actions in this plan would impact on cultural or heritage sites, the spread of non-native species, water quality or biodiversity under the Natural Environment and Rural Communities Act 2006. In the sections that follow, we summarise our updated understanding of environmental and water quality receptors.

6.3 Statutory designated sites

We have considered the environmental effects of this plan on designated sites, to which the following legislation applies.

- Conservation of Habitats and Species Regulations 2010 – Habitats Directive.
- Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000).
- Habitats Regulations Assessment (HRA) and Strategic Environmental Assessment Directive (SEA).
- WFD, River Basin management Plans and UK Biodiversity Action Plan.
- Other protected areas under international agreements such as Ramsar sites and non-statutory sites, such as local wildlife sites and reserves.

We have assessed the sensitivity of sites to abstraction under the Restoration of Sustainable Abstraction Programme (RSA) in conjunction with the Environment Agency under the National Environmental Programme, (NEP) and will continue to be assessed as part of WINEP. The details of our assessment of environmental impacts arising from implementing the River Severn Works and River Blithe drought schemes are summarised below.

6.4 Habitats Regulations assessment

The EU Habitats Directive was transposed into UK law by the Habitats Regulations 1994. The Regulations require a Habitats Regulations Assessment (HRA) to be carried out to determine whether plans are likely to have a significant effect on European Sites, including Special Areas for Conservation (SACs), candidate SACS (cSACs), Special Protection Areas (SPAs) and Ramsar sites (Wetlands of international importance).

We have carried out Habitats Regulations Assessment for the supply options included in this drought plan. Originally undertaken in 2018, these were updated in 2021 to include Stage2 appropriate assessment and again reviewed for this update.

River blithe drought permit

Our study of the River Blithe and associated designated receptors indicated that no significant effects because of use of the permit. This is in part due to the generally infrequent use of the permit and the relatively short duration for which it would be deployed so effects would not be observed during its use.

River Mease SAC

Our study of the River Mease in AMP4 (2005 to 2010) considered the potential impacts of groundwater abstraction at Chilcote on this SAC. We concluded that there is no evidence to suggest that abstraction at current rates is causing a significant detrimental impact on the river flow. Given the semi-confined nature of the aquifer and the slow response rate of surface water to changes in abstraction, we assessed it very unlikely that short periods of abstraction at the higher, peak licence rate will be translated into impacts on the river low flows as long as annual abstraction remains the same.

River Severn Drought Order

Given the complexity of the abstractions on the River Severn, with several drought permits/ orders in effect in an extreme drought event, updated hydrological modelling would be required to support our drought permits/ orders and update the HRA's. If this scenario were to occur, and taking account of the immediately preceding baseline conditions, we would fully assess whether adverse effects would arise. Sufficient time is allowed to complete this work, in preparation for the drought permit.

In addition to Habitats Directive sites within or immediately adjacent to our supply area, we have reviewed downstream sites that may be affected by its activities. As a result the Severn Estuary Special Area of Conservation (SAC) and Ramsar site were assessed within the HRA of the River Severn Drought Scheme (RSDO) environmental assessment work in 2018. The report concluded that no significant effects are likely as a result of the River Severn Works drought plan proposals 'alone'; however, it is not possible to conclude no adverse effect 'in combination' with other drought schemes operated by Severn Trent Water and the Environment Agency as a result of the Gloucester and Sharpness Canal abstraction operated by the Canal and River Trust (CRT) at the Severn Estuary. This issue is also reported as unresolved in the assessment by the Environment Agency (2019). They however assessed that if the abstraction by the CRT to the Gloucester and Sharpness Canal could be limited to 300Ml/d there would be adequate mitigation against impact on the site and its designated species by the various drought measures in combination. If the Environment Agency cannot secure agreement with the CRT on this limitation, it has stated it would have proved grounds of Imperative Reasons of Overriding Public Interest under the Habitats Directive to allow it to impose the RSDO. We are not aware of any change to this position.

6.5 Strategic Environmental Assessment

European Directive 2001/42/EC, otherwise known as the Strategic Environmental Assessment or SEA Directive, requires the "assessment of the effects of certain plans and programmes on the environment". Water companies, as responsible authorities, must determine if their drought plans fall within the scope of the SEA Directive. We have applied government[12] and industry guidance in the decision-making process to determine the requirement for an SEA for this plan.

The revised HRA screening and appropriate assessment concluded that based on current understanding of the River Severn drought order, and other options, that there are no likely significant effects from our plan, and therefore there is no requirement to further assess the plan through a SEA. The EA are reviewing their own River Severn drought order, which is closely related to our permit, and until this is completed, there is no requirement to update our own assessments. We also continue to work with Natural England as required for any updates to our assessments if the EA drought order on the Severn changes.

Having followed this guidance, it is our conclusion that an SEA is not required in respect of this drought plan.

6.7 Environmental Monitoring

As a result of our assessments, we have produced several environmental monitoring plans to assess the impact of implementing our supply-side action of existing licence headroom, focused on surface water bodies identified through the WINEP review of our abstractions. We have assessed the environmental impact against the WFD requirements[13] by means of changes in flow regime that would impact ecological status. As this drought action will be in place only in exceptional circumstances – for example, an extreme drought not on historic record or if demand actions prove to be ineffective - any deterioration of groundwater body status is of a temporary nature. Any significant impact because of groundwater deterioration would be to the status class of the surface water bodies and ecology.

We carry out environmental monitoring and refer to environmental and flow data held by other organisations such as the Environment Agency and Severn Trent Water. We do this so that should we need to implement certain drought actions we are able to compare the baseline data to any additional data collected 'in drought' or 'post drought'. We determine the frequency and type of our monitoring proportionately depending on environmental risk and factors such as how frequently we would expect a drought option might be used in the future.

Environmental mitigation

Should our monitoring show that there are any adverse impacts on the environment from any of the drought measures that we implement then we would consider what mitigation is appropriate. It is important to note that we would not put in mitigation to address adverse impacts caused by the drought but to address any impacts caused by our drought management actions. When considering mitigation, we would also assess whether the impacts were likely to be short or long term. This is because different environmental receptors can recover faster than others. We also note that because we aim to bring in demand side measures before any supply side measure that could harm the environment, we are minimising the risk of needing to put in any mitigation.

Mitigation measures can include:

- active fish monitoring and/or transfer
- aeration (for example, of discharges)
- reduction of other abstractions, if possible
- freshet releases
- other forms of flow augmentation (potentially from rarely used/emergency/resilience sources)
- increase the frequency/ coverage of monitoring – this constitutes 'in- drought' monitoring

[12] A Practical Guide to the Strategic Environmental Assessment, ODPM, 2005.
[13] Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations), UK SI No. 407

- ensure there is adequate ‘post-drought monitoring’; and
- habitat restoration.

The list above is neither exhaustive nor prescriptive and we may not necessarily need all these measures in every drought. In the unlikely event that we need to use any of the actions described in Section 4 (Extreme Drought Measures) the long lead in time will allow time to carry out a hydrological and environmental assessment. We will consider what, if any, mitigation is necessary as part of these environmental assessments in conjunction with the EA.

7. Recovery from drought

This section explains how we identify the end of a drought with sufficient confidence that the situation has returned to normal, and the actions that we would carry out towards the end of, and after a drought has ended.

7.1 Identifying the end of a drought

The end of a drought can be defined as the period when the risk of impacts from drought is no greater than during a normal year, and where normal conditions have continued for a period. Each drought sequence is different, and to determine the end of a drought we will use the observations and data captured in our drought management tool to inform our decisions. We would normally expect a drought event to have ended when we are no longer in trigger Level 1, however there can be residual environmental stress when recovering from drought, and our triggers also reflect this, so environmental actions such as some enhanced communications may continue.

Triggers for the end of drought

The key triggers and indicators that inform the recovery from drought are:

- When storage levels in Blithfield Reservoir have returned to being above trigger Level 1.
- Cumulative average rainfall Long Term average returns to the normal range available as observed by EA regional rainfall totals and company observations at our rain gauges.
- Soil moisture deficit has returned or significant recovery observed.
- Groundwater levels have returned to the normal range.
- River flows have returned to normal.

Enough key indicators will need to be showing a trend approaching long-term average levels, supported by meteorological outlooks with some certainty attached. It is important in a prolonged drought to ensure confidence in sufficient sustained recovery in resources before the end of a drought is declared, and when drought measures are lifted. The primary trigger of all of these is Blithfield reservoir storage. We recognise that this may not align with the Environment Agency declaration of a drought in all instances, or a prolonged period of dry weather for environmental drought. We would expect to liaise closely with the Environment Agency and other water companies to align our decisions with the regional situation as far as is practical and to complement the Environment Agency's and regional position on drought status.

Lifting of Restrictions

Ending drought management actions is likely to be made progressively, in accordance with our triggers and indicators, although we are committed to removing any restrictions on customer use through TUBs or ordinary drought orders as soon as is reasonably practical where the impacts on managing the drought would not be outweighed by those on our customers' activities. We will consider the status of our triggers, time of year and forward-looking meteorological outlooks before lifting restrictions.

The lifting of restrictions requires notification to be published on our website and in two newspapers circulating in the affected areas. Unlike the imposition of restrictions, there is no lead in time or consultation required and restrictions will be lifted immediately when the notice is given. We would look to alignment with neighbouring water companies when lifting restrictions, and with regional communication.

Stakeholder Engagement

We will aim to inform customers and stakeholders in a timely manner when the situation has returned to normal. Restrictions may remain in place as a drought situation heads through recovery to ensure consistent messages and

maximise the benefits of water saving, however we will inform customers within a week of restrictions being lifted through multiple channels.

Following a drought of any severity, we will thank all customers and stakeholders for their efforts in reducing water use, and for supporting us through the drought. Following our post drought review, we will publish our lessons learnt report and information on the effectiveness of our drought actions and water savings measures.

7.2 Post drought actions

The drought management team will be responsible for stepping down or stopping any ongoing drought actions such as restrictions, once approval has been provided. There are several post drought actions that would be taken, alongside regular reviews.

Post drought review

Should a drought event occur, we will carry out a timely post-drought review, which will examine the effectiveness of our drought plan in specific areas, including the following.

- Environmental monitoring during and after drought – was it appropriate and effective?
- Drought management actions – were they successful, what was their quantifiable effect in reducing demand?
- Performance of sources – did deployable output and yields meet expectations?
- Demand measures – were the savings realised as expected, and were they effective during periods when most required?
- Were any strategic investments made which might have a material effect on other plans, such as the WRMP?
- What was the cost of implementing drought actions?
- Was our communications strategy effective in changing customer behaviours?
- Any other lessons learnt from the experience of the drought, and a review of data.

Not every drought event will extend long enough that all the above are required, and the detail would be more comprehensive post level 2, the list above is also not meant to be exhaustive.

Our lesson learnt review will be signed off by the Director of Strategy and Regulation, and will take account of pre drought, drought and post drought, alongside experiences of implementing drought actions across the various parts of the business responsible for implementing these

We will work closely with the Environment Agency and with other key stakeholders to produce our review as appropriate. We will carry out our review within three months after the end of a drought, and we will produce a 'lessons learned' report within three months after that. We will follow this, within a further 12 months, by a monitoring report update on any actions identified and taken. Any significant learning arising from our reviews that leads to changes in our approach to implementing drought actions or managing a drought situation could trigger a revised and updated plan. The lessons learnt review for 2025 is included in Appendix F and has informed this draft revised plan.

Drought plan updates and health check

Once a drought has ended, we will use the post drought review findings and lesson learnt to refine and improve our plans if required due to any recommendations arising. This could require updates to the drought plan, and if they are significant and constitute a material change, then this may include producing a revised draft plan and undertaking consultation on a revised plan. We would always do this at least every five years, or if directed to by the Secretary of State for Defra. Changes to our drought plan may also require updates to the WRMP, which would be published as part of the WRMP Annual Review.

Regardless of drought or dry weather, we will undertake a drought plan health check annually. This is an opportunity ensure the actions presented in our drought plan have not changed, and to identify any updates that may be required. In a year without drought, we may undertake a drought exercise to test elements of our drought plan or emergency drought plan. This review will be shared with the Environment Agency and published on our website where any significant changes are identified.

8. Additional information

This section includes additional information that supports our drought plan and drought activities, which the guidance requires us to include, relating to transfer opportunities, compensation and support for other sectors that may be impacted during a drought.

8.1 Bulk transfers

We currently supply and receive small volumes of water to and from Severn Trent Water at the edges of our distribution system. These routine supplies are defined by bulk supply agreements between the two companies. There is little scope for optimising these small volumes in drought conditions, particularly as Severn Trent Water will also be affected by the conditions in a similar way.

The largest transfer between us and Severn Trent is as part of a joint abstraction licence and supplies water from the River Severn Works to Wolveredy Mill in Severn Trent's supply area. This export is up to a peak daily rate of 48 Ml/d. As the River Severn is a regulated river, abstraction can be limited by specific low flows, licence conditions and the terms of operating agreements. In the event of a drought, we will liaise with Severn Trent to ensure licence compliance and to optimise collective available resources.

There are also several other bulk supply arrangements between the two companies that allow water to be transferred in emergencies. These comprise export agreements to Severn Trent at the south-east and north-west boundaries of our supply area, and various small import agreements from Severn Trent. This will be explored during any drought sequence; however, it is very unlikely that these bulk supplies will be available to either company in a drought other than under very restricted and short-term conditions.

The table below shows the detail around our transfers with Severn Trent Water.

Table 10 – Bulk supplies

Site	Donor company	Total volume received
• The Lenmores, Alverley, • Dunsley Road, • Shut Mill Lane, Romsey, • Greatgates, • Hollington Rd, Hollington, • Causey Farm Rd, Hayley Green, • Warley Tower, • The Northway, • Stone Heath, • Clent Hills Booster • Heath Street, Smethwick, • Holyhead Rd/Park Lane, West Brom, • Vicarage Rd	Severn Trent	Up to 5Ml/d (peak week figure)
Perr Barr	South Staffs	< 20Ml/d
Brindley Bank	South Staffs	<4Ml/d

8.2 Compensation arrangement for drought measures

Unless it is judged unreasonable by virtue of exceptional circumstances, in the event that customers' supplies were to be interrupted or cut off under the authority of an ordinary drought order (NEUB) or emergency drought order, we may consider that compensation would be payable (or credits made) to those affected. Customers may be able to claim compensation in the event of supplies being interrupted or cut of that are because of our mismanagement during a drought.

Any compensation payments would be in accordance with our Code of Practice for household and non-household customers, and the Guaranteed Standards Scheme (GSS), available on our website, and periodically updated. Total payments will be capped at the average annual bill for the previous year. Our guarantees do not apply if we are prevented from meeting standards in exceptional circumstances or severe weather, including droughts.

The payments will be varied from time to time, in line with our guaranteed standards scheme.

8.3 Supporting other sectors

If alternative supplies are required by our customers during a drought situation, our priority is to look after our most vulnerable customers and priority sites (e.g. hospitals) in the first instance. We will then endeavour to support non-household customers wherever possible.

We are aware that many businesses, especially those with livestock and in rural communities, have alternative supplies or contingency plans in place for these situations, which we are very supportive of. However, whilst we cannot offer any guarantee of being able to provide alternative supplies in an incident, we will work with Retailers to prioritise our available resources to support businesses where we can e.g. priority given to businesses which care for livestock or provide vital community support functions. Any of our business customers can contact us for advice during these situations.

We are also conscious that there are private water supplies within our region. If a drought adversely affects people with a private water supply, we encourage them to contact their Local Authority in the first instance. The Local Authority responsible will consider whether the circumstances pose a danger to life or human health. In such a case we may be required to supply water by means other than in pipes, if practicable, for a period. We will also consider how we can help without putting our own customers' supplies at risk. The needs of vulnerable people shall be considered and would be agreed with the Local Authority, accounting for the water company's capabilities at the time, and provided accordingly. It is expected that large domestic private water supplies (more than 10,000 litres a day) make their own arrangements for alternative supplies. In the event of widespread requests for support, we would seek support and direction from the relevant industry regulators or government departments.

8.4 Fire and Rescue Service

We are required as part of the Fire and Rescues Services Act 2004, to provide reasonably required water for firefighting. Before Level 4 and Emergency Drought Orders, there are a small number of actions we take that could affect fire hydrants. The most obvious of these is if we lower pressure during a drought to reduce leakage. In these situations, it is important that we take every action to mitigate the impact on the fire service, and the below details our actions to deliver this:

- We will communicate with the fire service to keep them updated of our situations and any planned interventions. We have engagement meetings with the fire service as part of business as usual, and we will engage with these contacts through our drought management team.
- If appropriate, we advise them of alternative locations to take a supply from that have higher pressure/ flow. For example, we may suggest that they connect to a larger main or bypass fittings (PRV) that may be creating a reduction of pressure.

- If required, we will support on site by sending a South Staffs Water technician to the area to assist.

South Staffs Water

Cambridge Water

To help create a world where essential services and infrastructure deliver for customers, clients and our planet

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