



Draft Drought Plan 2021

MARCH 2021



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Document Control Sheet

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Glossary

DEFRA	Department of Environment, Food and Rural Affairs
DWI	Drinking Water Inspectorate
EA	Environment Agency
IWNL	Independent Water Networks Limited
NAV	New Appointment and Variations
NEUBs	Non-essential Use Bans
SoS	Secretary of State
TUBs	Temporary Use Bans
WRMP	Water Resource Management Plan
WRZ	Water Resource Zone





Executive Summary

This plan outlines the response Independent Water Networks (IWNL) will take in the event of a drought and how we shall manage our customer's supply to meet our agreed levels of service, as stated in our Water Resources Management Plan 2019.

IWNL currently hold 97 New Appointment and Variations (NAV) located across England, with most sites across central and southern parts of England. These sites rely solely on the provision of bulk transfers from the incumbent water company in whose area each NAV is located.

At present IWNL does not have its own sources and as such supply side management is wholly under the control of the incumbent supplying company. IWNL shall rely on effective communications with the affected customers and water efficiency (demand side management) to assist the situation should a drought develop.

The application of restrictions or the progression of drought orders shall be approved at board level. Exemptions to these would be automatic for reasons of health and safety and for registered disabled customers.

The implementation and subsequent lifting of any restrictions shall be managed jointly with the incumbent water company to ensure that the perception of customers is not damaged by inconsistent messaging.



DRAFT DROUGHT PLAN 2021

Section One:

Introduction





1.0 Introduction

This plan outlines the response Independent Water Networks (IWNL) will take in the event of a drought and how we shall manage our customer's supply to meet our agreed levels of service, as stated in our Water Resources Management Plan 2019. For differences between our WRMP19 and Drought Plan 2021, please see Appendix A.

1.1 Independent Water Networks

Independent Water Networks (IWNL) is a subsidiary company within the BUUK Infrastructure group of companies. We refer to these companies in this document as the "Group". The Group is involved in project acquisition, management, design, construction, ownership, operation and maintenance of utility networks and associated site infrastructure, serving new developments throughout the UK mainland.

The Group focuses primarily on the new build market and is the leading independent utility and infrastructure provider in the UK and has broadly divided its activities between the regulated ownership of utility network assets and the unregulated provision of utility infrastructure and asset management services. The Group owns assets across England, Scotland and Wales which include gas, electric, water, wastewater, district heating, and fibre networks.

IWNL does not currently own or operate water sources and relies solely on the provision of bulk transfers of potable water from the incumbent water company in the area that IWNL's NAV is located.

IWNL currently have 97 NAV sites located across England; these sites are illustrated in their respective incumbents WRZ in section 5.

1.2 Legislative Background

A drought is defined as a protracted period of abnormally low rainfall, they develop over a period of months and this allows water companies to plan and attempt to minimise the impacts of periods of water scarcity.

Section 39B of the Water Industry Act (1991) states:

1. It shall be the duty of each water undertaker to prepare and maintain a drought plan.
2. A drought plan is a plan for how the water undertaker will continue, during a period of drought, to discharge its duties to supply adequate quantities of wholesome water, with as little recourse as reasonably possible to drought orders or drought permits.

This Drought Plan fulfils this requirement. This document has been produced in line with the Drought Plan Regulations 2005, the Drought Plan (England) Direction 2016 and the guidelines provided by the Environment Agency ("Water Company Drought Plan guideline" – April 2020). These Guidelines set out the steps of the process that water companies must follow in the preparation of a Drought Plan and these are shown in Figure 1.



1.3 Drought Plan Security Statement

This plan does not contain potentially sensitive information, in accordance with the requirements of Advice Note 11 edition 5 'The Control of Sensitive Water Company Security Information' dated February 2016,

and the 'Guidance to Water Companies on the release of security sensitive information' dated May 2012, both as issued by DEFRA. Therefore, no information has been redacted from this document.

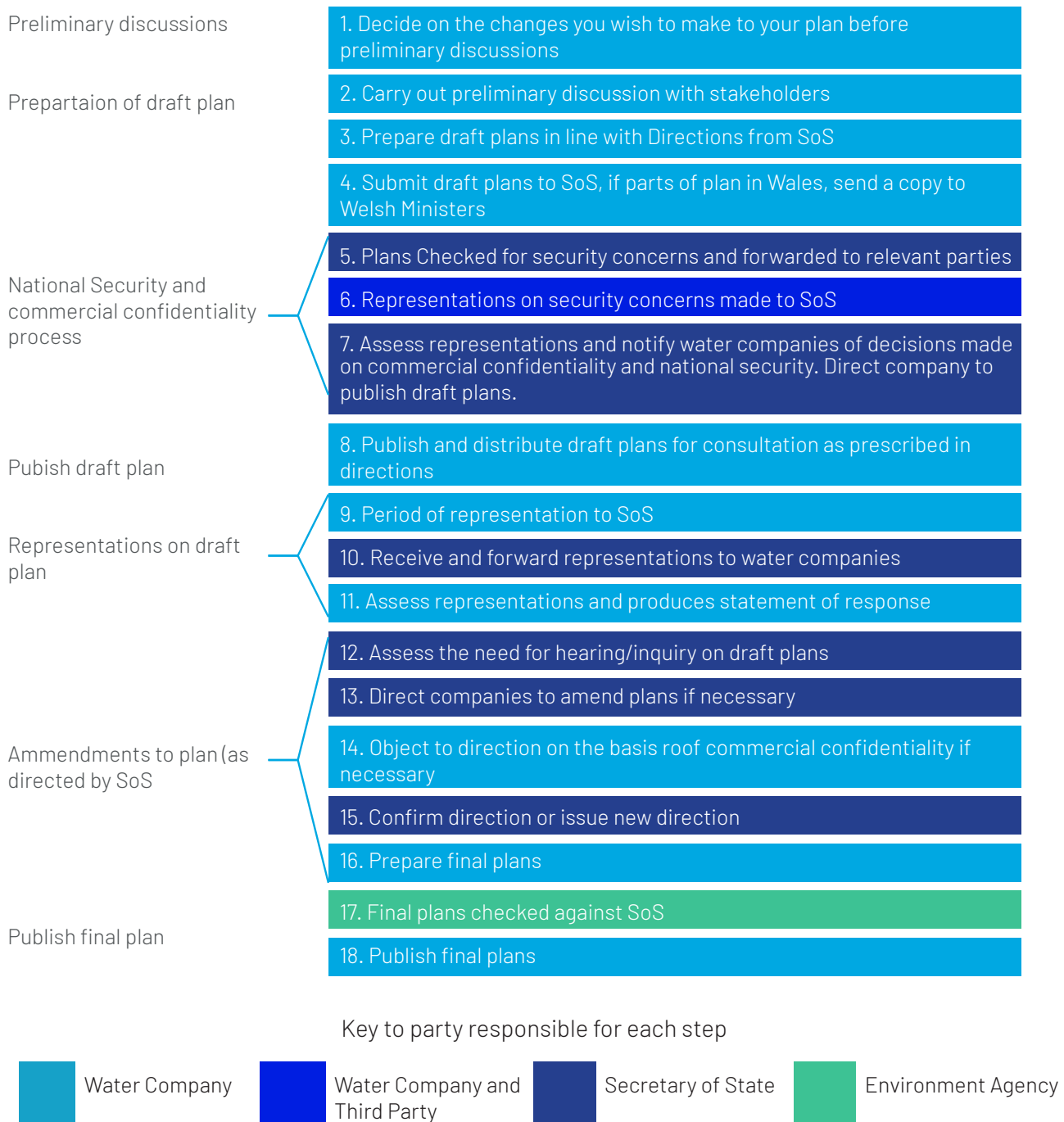


FIGURE 1.1 STATUTORY PROCESS FOR THE DEVELOPMENT OF A DROUGHT PLAN



1.4 Consultation Process

PRE-CONSULTATION

Prior to publication of the Draft Drought Plan 2021, IWNL consulted the Environment Agency and incumbent water companies as part of the compilation of the Drought Plan.

PUBLIC CONSULTATION

We have published this draft drought plan for public consultation in accordance with the guidelines provided by the Environment Agency ("Water Company Drought Plan guideline" – April 2020), inviting views from individuals and organisations on our plan. The period of consultation will be 8 weeks, closing on 1st August 2021. IWNL will produce a Statement of Response to this consultation within 15 weeks of it opening. We are consulting with the following:

- All our customers (approx. 38,000),
- Secretary of State (SoS),
- The Environment Agency (EA),
- The Drinking Water Inspectorate (DWI),
- The Water Services Regulation Authority (OFWAT),
- The Consumer Council for Water (CC Water),
- Natural England,
- Historic England,
- Canal and River Trust,
- Affinity Water (AFW),
- Anglian Water Services Limited (AWS),
- Bristol Water (BW),
- Cambridge Water Company (CWC),
- Essex and Suffolk Water (ESW),
- Northumbrian Water Limited (NWL),
- Portsmouth Water (PW),
- Severn Trent Water Limited (STW),
- South East Water (SEW),
- South Staff Water (SSW),
- Southern Water (SW),
- Thames Water Utilities Ltd (TWUL),
- Yorkshire Water (YW),
- Relevant Councils in IWNL's supply areas

Once we have closed the public consultation, we will take the representations into account. All material amendments made to the draft will be summarised in a statement of response document, which will be made available on our website.

DRAFT DROUGHT PLAN 2021

Section Two:

Management & Drought Action Strategy



2.0 Management & Drought Action Strategy

IWNL believe that all stakeholders and customers should be aware when water is scarce and the likelihood of the introduction of water restrictions is increased. Awareness for customers and other stakeholders begins with this Drought Plan, which outlines the level of service that IWNL customers can expect to receive.

These customers and other stakeholders can comment and influence the Drought Plan every five years. To this end, our strategy is to publish these documents on our website for information purposes and to review the content annually, whilst consulting and amending them every 5 years. IWNL continues to grow and will acquire new NAV licences following publication of this plan. As further licences are obtained, IWNL will assess any zonal impact as part of the annual drought plan review, which will be available on our website.

Table 2.1 below details the drought classification levels and the actions to be undertaken. These levels and the corresponding actions are set by the Environment Agency and are used by water companies operating in England. IWNL does not currently own or operate water sources therefore our levels of service are linked to demand side actions, not supply side actions.

TABLE 2.1 DROUGHT CLASSIFICATION LEVEL AND IWNL'S LEVEL OF SERVICE SUMMARY

DROUGHT CLASSIFICATION LEVEL	ACTION SUMMARY	IWNL'S LEVEL OF SERVICE
1 Developing Drought	Communications campaign, increased leakage control	1
	Drought actions with minor environmental impacts (optimising sources, outage)	N/A
2 Drought	Temporary use bans	2
	Drought actions with minor environmental impacts	N/A
3 Drought	Moderate environmental impact drought permit and ordinary drought orders	3
	All possible actions to avoid emergency drought orders including major environmental impact drought permits and order	N/A
4 Severe Drought	Follow guidance set out in IWNL's emergency plans regarding drought events	4

Since IWNL mirror the actions of the incumbent supplier, IWNL's triggers are detailed below; the implementation of these drought measures is based on liaison with DEFRA and the incumbent water companies. Since each incumbent has several different triggers and intervention measures within each of their regions, these are not all listed within this plan. These levels of service mirror those of the incumbent water company and the frequency that these are likely to be implemented are shown by region in section 5.

TABLE 2.2 IWNL DROUGHT TRIGGERS

IWNL'S LEVEL OF SERVICE	TRIGGER	EVENT CONTROLLER	POSSIBLE DROUGHT MEASURES
1	Communication with DEFRA and incumbent water companies about possible water shortages.	IWNL Senior Management	Media/water efficiency campaign
2	Communication by incumbent water company that they have reached their trigger level for a Temporary Use Ban.	IWNL Director	Temporary Use Ban
3	Communication by incumbent water company that they have reached their trigger level for a Drought Order and/or Extreme Drought Management Actions.	BUUK Board-Level Director	Ordinary Drought Order to Restrict Water Use (Non-Essential Use Ban)
4	Communication by incumbent water company that they have reached their trigger level for an Emergency Drought Order.	BUUK CEO	Follow guidance set out in IWNL's emergency plan regarding drought events
Return to Normal Services	Communication by incumbent water company that they have reached their trigger level for a Return to Normal Services.	IWNL Senior Management	Media campaign

Should these triggers be met, IWNL will increase communication with the incumbent water company to ensure we are satisfied with the response and to ensure clear, timely correct communications can be made with our customers. If IWNL need to implement drought measures, we will consider:

- DEFRA/EA guidance.
- The UKWIR Code of Practice generally and adherence to the 2nd principle of proportionality.
- The requirement for a consistent approach with the incumbent water company.

Since IWNL do not have access to the underlying information used by incumbent water companies to trigger different drought levels, we have been unable to test this plan against any scenarios.



2.1 IWNL Drought Stages

The table below shows the drought action IWNL would undertake when the triggers detailed in Table 2.2 are reached and the order of implementation. It also

details members of the Drought Management Team which would be convened when IWNL deem that the “Developing Drought” scenario (IWNL Level of Service 1) was in place. The Drought Management Team is also shown in Figure 2.1.

TABLE 2.3 IWNL DROUGHT STAGES AND ACTIONS

DROUGHT CLASSIFICATION LEVEL	IWNL'S LEVEL OF SERVICE	DROUGHT EVENT CONTROLLER	DROUGHT MANAGEMENT TEAM	SUMMARY OF ACTIONS
N/A	Normal Service	IWNL Senior Manager <ul style="list-style-type: none"> IWNL Head of Regulations and Compliance 	IWNL <ul style="list-style-type: none"> Water Compliance Scientist 	Normal programme of: <ul style="list-style-type: none"> Liaison with incumbent's wholesale/NAV manager Leakage detection and repair Water efficiency work
Level 1 (Developing Drought)	1	IWNL Senior Manager <ul style="list-style-type: none"> This may be: IWNL Head of Regulations and Compliance IWNL Head of Water Asset Management Operations IWNL Head of Asset Delivery 	IWNL <ul style="list-style-type: none"> Water Networks Director IWNL Head of Regulations and Compliance IWNL Head of Water Asset Management IWNL Head Asset Delivery Water Compliance Scientist Network Performance Analyst BUUK Customer Services Manager Marketing Manager 	<ul style="list-style-type: none"> Media/water efficiency campaign <ul style="list-style-type: none"> Water efficiency promotions Appeal for restraint Liaison with incumbent's water resources teams Advise Environment Agency/ Consumer Council for Water of situation Enhanced demand management <ul style="list-style-type: none"> Assessment of per capita consumption in areas where a media campaign is ongoing by additional meter reads. Enhanced leakage detection and repair from data loggers and meter readings. Consultation and pre-planning on the implementation of a Temporary Use Ban Pre-planning for the implementation of Non-Essential Use Ban



DROUGHT CLASSIFICATION LEVEL	IWNL'S LEVEL OF SERVICE	DROUGHT EVENT CONTROLLER	DROUGHT MANAGEMENT TEAM	SUMMARY OF ACTIONS
Level 2 (Drought)	2	IWNL Board Level director <ul style="list-style-type: none"> IWNL Water Networks Director 	As above plus <ul style="list-style-type: none"> IWNL Water Networks Director BUUK Managing Director of Markets BUUK Regulations Director 	<ul style="list-style-type: none"> Continuation of preceding actions (including greater liaison with incumbent water resources teams) Implementation of Temporary Use Ban (TUBs) Apply for drought orders for Non-Essential Use Ban (NEUB) Briefing of Environment Agency, Consumer Council for Water, DEFRA and other stakeholders Full media campaign with direct appeals for TUBs compliance. Assessment of per capita consumption in areas where a TUB is in place through use of data loggers and enhanced meter reads. Planning to ensure supply security for vulnerable customers Pre-planning for emergency drought order application
Level 3 (Drought)	3	BUUK Board Level director <ul style="list-style-type: none"> BUUK Managing Director of Markets 	As above plus IWNL Board: <ul style="list-style-type: none"> BUUK CEO BUUK Chief Financial Officer 	<ul style="list-style-type: none"> Continuation of preceding actions (including enhanced liaison with incumbent water resources teams) Implementation of Non-Essential Use Ban Implementation of Extreme Drought Management Actions Full media campaign to reflect the ongoing severity of the situation Increased frequency of briefing of Environment Agency, Consumer Council for Water, DEFRA, and other stakeholders Focus water-saving audits in areas where NEUB is in place Apply for emergency drought order



DROUGHT CLASSIFICATION LEVEL	IWNL'S LEVEL OF SERVICE	DROUGHT EVENT CONTROLLER	DROUGHT MANAGEMENT TEAM	SUMMARY OF ACTIONS
Level 4 (Severe Drought)	4	BUUK CEO	<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> Follow guidance set out in IWNL's emergency plans regarding drought events
N/A	Return to Normal Service	IWNL Senior Manager This may be: <ul style="list-style-type: none"> IWNL Head of Regulations and Compliance IWNL Head of Asset Operations IWNL Head of Asset Delivery 	IWNL <ul style="list-style-type: none"> Water Networks Director IWNL Head of Regulations and Compliance IWNL Head of Asset Operations IWNL Head of Asset Delivery Water Compliance Scientist Network Performance Analyst BUUK <ul style="list-style-type: none"> Customer Services Manager Marketing Manager 	<ul style="list-style-type: none"> Media campaign that restrictions are lifted Review the effectiveness of actions taken during the drought Publish review of drought measures following the event Resume normal programme of: <ul style="list-style-type: none"> Liaison with incumbent's wholesale/NAV manager Leakage detection and repair Water efficiency work

SEVERITY OF THE DROUGHT ►►►



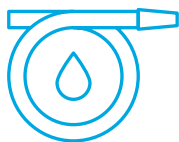
FIGURE 2.1 DIAGRAM OF IWNL'S DROUGHT MANAGEMENT TEAM AT DIFFERENT DROUGHT LEVELS

DRAFT DROUGHT PLAN 2021

Section Three:

Drought Measures





3.0 Drought Measures

A summary of the drought measures IWNL will implement are described in this section.

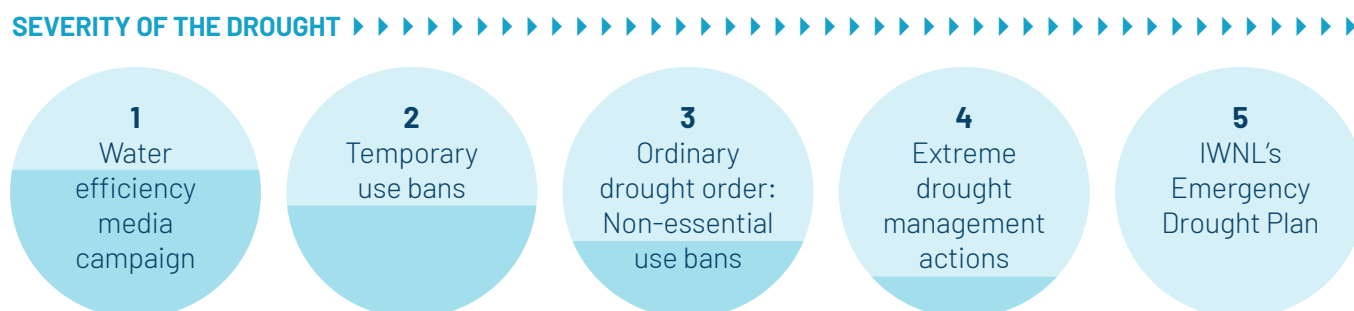


FIGURE 3.1 IWNL'S DROUGHT MEASURES

Since publication of IWNL's WRMP19, the Environment Agency has agreed that IWNL can group individual operating areas that sit within a single incumbent's water resource zone in the event of a drought under Section 74 of the Water Resource Act 1991, paragraph 5 (a). Appendix A illustrates how our sites are grouped into drought zones.

3.1 Exemptions

INWL would follow the UKWIR Code of Practice and Guidance for Water Companies on Water Use Restrictions (2013), which sets out the statutory and universal exemptions offered by all companies to Temporary Use Bans and drought orders. The types of exemptions that companies can offer can be defined as follows:

- Statutory - as defined in the legislation and granted by all water companies.
- Discretionary Universal Exemptions - offered by all water companies:
 - on the grounds of disability granted to those holding a Blue Badge.
 - customers using an approved drip or trickle irrigation system fitted with a PRV and timer.
 - commercial customers who use hosepipes as part of their business for some TUB categories

(e.g. hand car washing, window cleaning and graffiti removal).

- Discretionary Concessional Exemptions – offered at the discretion of each water company on an individual basis. Customers must make representations to receive this exemption.

3.2 Water Efficiency Media Campaign

Ahead of implementing any other drought management actions, a water efficiency campaign would be launched by IWNL. This would be initiated when the incumbent supplier informed us that they had entered the “developing drought” scenario (IWNL Level of Service 1 scenario). Water efficiency campaigns will be run throughout the duration of the drought, for further details please see section 4.2.

In the absence of any previous data, IWNL assume that this will result in a reduction of approximately 1% of average household water demand. This assumption is based on an incumbent’s estimation.

The efficacy of this campaign will be monitored, as described in section 4.4 (IWNL have 100% metered properties) and an assessment of the demand savings will be undertaken prior to the implantation of TUBs. The data collected from monitoring customer communication will be used in future plans.

3.3 Temporary Use Bans (TUBs)

The Flood and Water Management Act (2010) gave new powers to water companies to implement a wider range of temporary water use restrictions during a drought, without the need for a drought order. The Water Use (Temporary Bans) Order 2010 and the Drought Direction 2011 supplement the Flood and Water Management Act and set out the categories of water use that companies can restrict with and without a drought order.

IWNL’s pre-planning on implementing a Temporary Use Ban would begin during the Media Campaign described in section 3.2.

Implementation of TUBs will only occur following confirmation from our incumbent supplier that they are implementing TUBs; this is to ensure there is appropriate consistency of messaging and approach to avoid confusion for customers.

Our assumptions for the likely demand savings to be made from the implementation of TUBs restrictions have therefore been based on the analysis of data collected during the 2003 drought (UKWIR, 2007) and the estimated savings set out in the industry Code of Practice and Guidance on Water Use Restrictions (2013). We estimate that our TUBs restrictions would save up to 9.5% of peak summer household demand. The efficacy of TUBs will be monitored, as described in section 4.4 and this data used in future plans.

CONSULTATION ON TUBS

We will follow the requirements set out in the legislation (Water Industry Act 1991 Section 76B (2) & (3) as amended by Section 36 of the Flood & Water Management Act) relating to the public consultation process on the implementation of temporary use bans.

We will communicate about this consultation as described in section 4.3, using the example notifications for water use restrictions under a temporary use ban provided in Appendix C of the UKWIR (2013) Code of Practice and Guidance (see Appendix B). Ongoing communications with customers will be used to inform them when the restrictions have come into effect.

We plan to allow a 14-day consultation period, within which customers would be able to make representations (including for Discretionary Concessional Exceptions), although this may vary depending on the incumbent water company’s consultation timeline.

ACTIVITIES INCLUDED IN TUBS

The activities that will be restricted are set out below:

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

**WE ESTIMATE THAT OUR TUBS
RESTRICTIONS WOULD SAVE
UP TO 9.5% OF PEAK SUMMER
HOUSEHOLD DEMAND.**



3.4 Ordinary Drought Orders and Extreme Drought Management Actions

The decision to apply for an ordinary drought order and extreme drought management actions shall be made at board level, when triggered by the incumbent water company applying for one. Before doing so, IWNL would ensure that measures to reduce demand for water set out in this drought plan have been implemented and we would notify DEFRA, any relevant navigation authorities, the Environment Agency and Natural England. We would also issue notices to local authorities responsible for areas affected by the order/actions and any organisations protected by a statutory requirement (if applicable in the area).

IWNL would directly mirror the incumbent water company in our delivery of drought and extreme drought management actions (see section 4.1 for details on how this communication will be managed).

ORDINARY DROUGHT ORDER - NON-ESSENTIAL USE BAN (NEUB)

To further restrict water use IWNL may need to implement a non-essential use bans (NEUBs) under the Drought Direction 2011. IWNL's pre-planning on implementing a Non-Essential Use Ban would begin during the Media Campaign described in section 4.2.

IWNL anticipate that it will take up to 3 months to implement this option. This will allow time for the drought order application and determination, including the publication of a notice of the Drought Order application in the press. Therefore, the application process will be commenced at the same time as the TUBs restrictions are implemented (section 3.3) to ensure enough lead time before the restrictions are required.

IWNL will mirror our incumbent water supplier about the implementation of NEUBs under the Drought Direction 2011.

The demand saving associated with imposing NEUB restrictions has been assessed using the UKWIR/EA methodology set out in the 2002 report Evaluating the impact of demand restrictions. We estimate that the NEUB restriction would save up to 2% of non-household demand. The efficacy of NEUB will be

monitored, as described in section 4.4 and this data used in future plans.

EXTREME DROUGHT MANAGEMENT ACTIONS

Extreme drought management actions will be considered before level 4 severe drought; these actions will help delay level 4 severe drought restrictions such as emergency drought orders that authorise stand pipes or water tanks.

IWNL will mirror our incumbent water supplier extreme drought management actions. An assessment will be made of previous actions demand savings prior to implementation.

IWNL's pre-planning on the implementing of these actions would begin during the TUBs implementation described in section 3.3.

In the absence of any previous data, IWNL assume that the extreme drought management actions will result in a reduction in demand of between 20-50%. The efficacy of this measure would be monitored, as described in section 4.4 and this data will be used in future plans.

3.5 Emergency Drought Plan

The decision to enact IWNL's emergency drought plan regarding drought events shall be made at board level. This will be triggered by the incumbent water company entering level 4 drought action. Before doing so, IWNL would ensure that measures to reduce demand for water set out in this drought plan have been implemented. If/when required, the relevant bodies will be notified of emergency plan actions.

IWNL's pre-planning on the implementing of actions in level 4 would begin during the TUBs implementation described in section 3.3.

In the absence of any previous data, IWNL assume that emergency plan actions will result in a reduction in demand of between 20-50%. The efficacy of this measure would be monitored, as described in section 4.4 and this data will be used in future plans.



3.6 Return to Normal Services

The decision to return to normal services will be triggered when the incumbent has identified that water resources have recovered and their trigger(s) for resuming normal services have been reached. Please see section 4.3 for how this will be communicated to our customers.

3.7 Compensation

The compensation payments we make to customers for interruptions to their water supplies are as specified in the IWNL Customer Code of Practice, which is available on our website at <https://www.iwnl.co.uk/useful-documents/>

3.8 Post Drought Review

Following issues in 2018 when there was a short, intense period of supply-side concerns, IWNL undertook a targeted communications programme to advise customers to be water wise. When these measures were reviewed, it was found that these had been fit for purpose.

Following the implementation of any drought plan measures, IWNL will review their efficacy on an ongoing basis (see section 4.4). A meeting or a series of meetings will be held with the event team to assess which factors worked well and those which could be improved upon.

IWNL will produce a "lessons learnt" report within 6 months of drought measures being lifted and publish this on our website. The review will provide an opportunity for those involved with the drought to identify any lessons learned and any potential improvements that could be made as a result to the drought plan.

HOW YOU CAN HELP:

From April 2019 to March 2020, the average person in the UK used 137.5 litres of water per day. Many of us use a range of appliances that use large amounts of water, often we do not know how much water they use.

WITH A HANDFUL OF SMALL CHANGES YOU CAN HELP THE ENVIRONMENT, SAVE WATER AND SAVE MONEY ON YOUR WATER BILLS.



DRAFT DROUGHT PLAN 2021

Section Four:

Communication Strategy





4.0 Communication Strategy

4.1 Communication with Incumbent Water Companies

All the bulk supply agreements that IWNL hold for our supply areas state that the incumbent "...shall give such notice to IWNL as is reasonable in the circumstances where it proposes to apply for an ordinary or emergency Drought Order and the terms sought."

During normal service conditions, IWNL attend regional water resource forums and hold regular liaison meetings with our Wholesale/NAV Manager at each incumbent water company. Water resources is a standard agenda item at all these meetings and is the first stage of communication regarding any drought measures that may come into force in the coming months.

When IWNL are informed that the incumbent water company is planning a media campaign, IWNL will start liaising directly with the incumbent's water resources and drought management teams to ensure a consistent approach between both companies. We aim to consult at the same time as the incumbent about applying for ordinary drought orders and emergency drought orders. We will also ask the incumbent water company to share the data they are collating for these applications so we can use this information in our application.

Similarly, IWNL will identify "Return to Normal" conditions through this communication with our incumbent suppliers, who will inform us that their measures indicate that this is the case and that they are lifting their drought restrictions. Post-drought, we will share our lessons learnt from the drought event with the incumbent and resume our regular liaison meetings.

4.2 Communication with Customers

During normal service, IWNL engage with customers about water use and water efficiency; it is important for there to be an understanding of water resource availability before a drought develops.

Our business as usual activities include the following:

- General promotion of water efficiency and knowledge of water use through our website
- Advice and information online
- Finding and fixing leaks on our network
- Targeted media campaigns at resource zones which have a higher than expected water usage
- Seasonal advice
- Call centre trained on general water efficiency advice e.g. leak detection techniques

As a drought develops, our communication with customers in the effected region(s) will increase and change from general to specific advice and information. The core message will urge customers to conserve water. The communication will be underpinned with an explanation as to the current water resource conditions and how the drought might continue to intensify. Table 4.1 illustrates how our customer communication message will change as the drought develops.



TABLE 4.1 IWNL'S CUSTOMER COMMUNICATION SUMMARY

DROUGHT CLASSIFICATION LEVEL	IWNL'S LEVEL OF SERVICE	DOMESTIC CUSTOMER COMMUNICATION MESSAGE	NON-DOMESTIC CUSTOMER COMMUNICATION MESSAGE
N/A	Normal Service	<ul style="list-style-type: none"> • General water efficiency messages • Targeted media campaigns for resource zones with higher than expected water usage 	<ul style="list-style-type: none"> • General water efficiency messages
Level 1 (Developing Drought)	IWNL's Level of Service 1	<ul style="list-style-type: none"> • Media/water efficiency campaign • Water efficiency promotions • Appeal for restraint • Increased media campaigns that potential temporary use bans (TUBs) will be needed should the drought worsen 	<ul style="list-style-type: none"> • Media/water efficiency campaign • Water efficiency promotions • Appeal for restraint
Level 2 (Drought)	IWNL's Level of Service 2	<ul style="list-style-type: none"> • Full media campaign to reflect the ongoing severity of the situation • Full media campaign with direct appeals for TUBs compliance • Increased media campaigns that potential non-essential use bans (NEUBs) may be needed should the drought worsen 	<ul style="list-style-type: none"> • Full media campaign to reflect the ongoing severity of the situation • Media campaigns that potential non-essential use bans (NEUBs) may be needed should the drought worsen
Level 3 (Drought)	IWNL's Level of Service 3	<ul style="list-style-type: none"> • Full media campaign to reflect the ongoing severity of the situation • Full media campaign with direct appeals for NEUBs and/or extreme drought management actions compliance • Increased media campaigns that further restrictions may be needed should the drought worsen 	<ul style="list-style-type: none"> • Full media campaign to reflect the ongoing severity of the situation • Full media campaign with direct appeals for NEUBs and/or extreme drought management actions compliance • Increased media campaigns that further restrictions may be needed should the drought worsen
Level 4 (Severe Drought)	IWNL's Level of Service 4	<ul style="list-style-type: none"> • Full media campaign to reflect the ongoing severity of the situation • Full media campaign with direct appeals for compliance 	<ul style="list-style-type: none"> • Full media campaign to reflect the ongoing severity of the situation • Full media campaign with direct appeals for compliance



DROUGHT CLASSIFICATION LEVEL	IWNL'S LEVEL OF SERVICE	DOMESTIC CUSTOMER COMMUNICATION MESSAGE	NON-DOMESTIC CUSTOMER COMMUNICATION MESSAGE
N/A	Return to Normal Services	<ul style="list-style-type: none"> Media campaign that restrictions are lifted and thank them for their support Publish review of drought measures following the event 	<ul style="list-style-type: none"> Media campaign that restrictions are lifted and thank them for their support Publish review of drought measures following the event

IWNL shall follow BUUK Infrastructure's "Incident Communication Policy" which identifies the roles and responsibilities when dealing with events, including drought, this includes escalation to the designated directors. IWNL shall primarily utilise the company website, www.iwnl.co.uk, to communicate the situation with customers. We would also use email, text messages and mail drops to customers to ensure they were aware of the part they can play in conserving water as well as informing them of the actions IWNL are taking to help manage the drought.

As IWNL sites are spread across England rather than regional, this is reflected in IWNL's communication strategy and avoids regional broadcast communications. However, IWNL will work with incumbents to ensure effective communication.

IWNL primarily provide water to domestic users. Our non-domestic customers are small businesses, predominantly retail and hospitality. Non-Essential Use Bans will have an effect on the businesses and organisations in our insets and as such communications with our non-domestic customers will be focused in drought levels 3 and 4.

Examples of the likely content of communications at different stages of a drought are detailed in Appendix B.

VULNERABLE CUSTOMERS

In the event of a drought we will aim to minimise any possible impacts on customers who are registered on our vulnerability register.

TARGETING SPECIFIC NAV AREAS

IWNL's customer database is set up with an identifier about the NAV area in which the customer is resident. IWNL routinely use this identifier to send targeted emails, text messages and letters to specific

geographic areas about regional events and incidents. IWNL would utilise this functionality to communicate with customers during a drought. Additionally, any messages on the website will clearly state which postcode areas are affected by drought measures.



4.3 Temporary Use Bans, Non-Essential Use Bans and Extreme Drought Management Actions

If IWNL need to introduce a Temporary Use Ban, apply for a Non-Essential Use Ban or extreme drought management action(s), in addition to the communication strategy set out in table 4.1, IWNL would place notices in local newspapers within the affected supply area. We will write to the MPs and Councillors representing the communities we serve and would brief all our staff and contractors to assist customers. Within our communications, IWNL would give details of how to make representations about the proposed prohibition; we would respond to any representation made to us on our website and by direct correspondence with the correspondent.

The implementation of any restrictions shall be managed jointly with the incumbent water company to prevent inconsistent messaging.

RETURN TO NORMAL SERVICES

We will communicate the following to our customers when water resource levels return to normal:

- Update our website to reflect the change of water resource availability
- Clearly announce the lifting of restrictions through media used during the restriction and thanking customers for their support
- Gather feedback from customers and stakeholders
- Evaluate our customer communication methods and undertake customer research
- Continue promoting water efficiency messages
- Publish our review of the drought measures undertaken during the event

The lifting of any restrictions shall be managed jointly with the incumbent water company to prevent inconsistent messaging.

4.4 Assessing the Efficacy of Communications

IWNL has 100% metering at all our properties and will use meter data to ascertain changes in per capita consumption during a drought to assess how effective the communication strategy is.

IWNL's network analysis team will investigate areas where consumption is highest, and these areas/properties will receive more targeted communications.

4.5 Communication with Stakeholders

The following organisations would be key contacts to work with and keep informed during a drought:

- Environment Agency
- Secretary of State for the Environment
- DEFRA
- Drinking Water Inspectorate
- Consumer Council for Water
- Water UK
- Ofwat
- Local Authorities
- Constituency MPs
- Local Fire Authorities

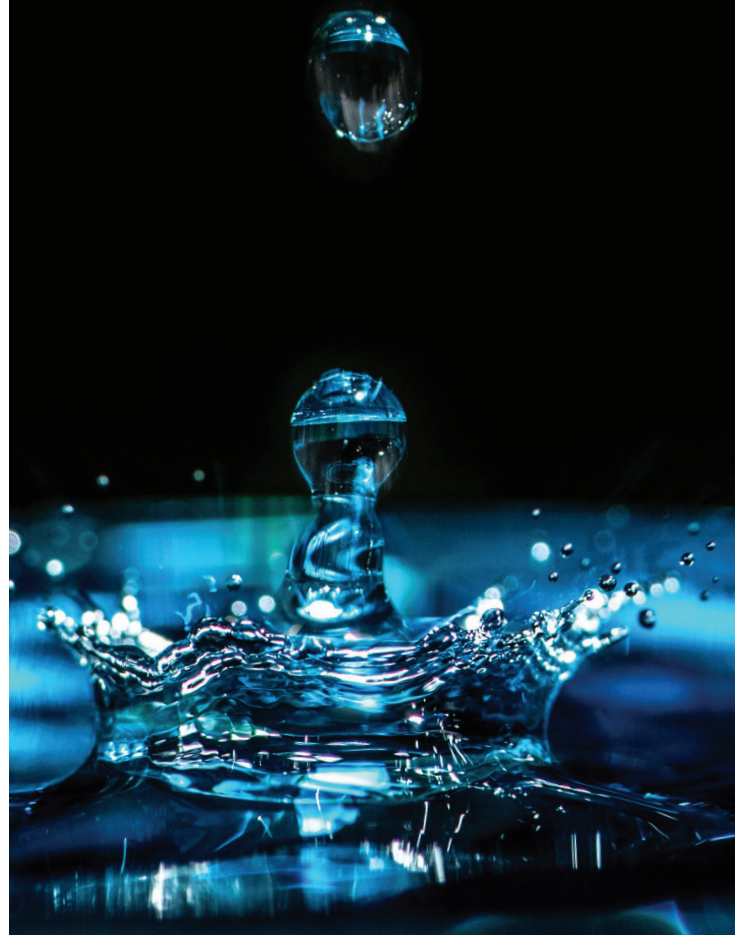
We will communicate with these stakeholders in conjunction with the incumbent.

LOCAL FIRE AUTHORITIES

In the event of emergency drought orders being authorised and implemented, we would notify the local Fire Authority as far in advance as possible. We take all reasonable measures to ensure adequate water supplies for the local Fire Authorities and will consult closely during a drought event.



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DRAFT DROUGHT PLAN 2021

Section Five:

Water Supply and Demand



5.0 Water Supply and Demand

IWNL serve sites located across England, this is shown in Figure 5.1 below. The supply to these sites is managed through a bulk supply agreement with the relevant incumbent water company. These bulk supply agreements guarantee the volume of water supplied unless a “force majeure” event occurs.

As IWNL do not operate our own sources, supply side management is wholly under the control of the supplying company. IWNL shall match the incumbent water companies in applying for drought orders and emergency drought orders and rely on effective communications with customers and water efficiency (demand side management) to assist the situation should a drought develop.



FIGURE 5.1 MAP OF IWNL'S SITES

5.1 IWNL Levels of Service by Incumbent Supply Region

Within each bulk supply agreement operated by IWNL is a clause to adopt the same restrictions of use as the supplying company.

IWNL and the respective incumbents have consulted on the levels of service in our insets. Each incumbent is listed below, along with the associated drought classification levels and service that IWNL customers can expect in each area.

IWNL have seven bulk supply agreements with Affinity Water, these supply agreements cover five discrete Affinity Water resource zones as shown in Table 5.1.

Affinity Water

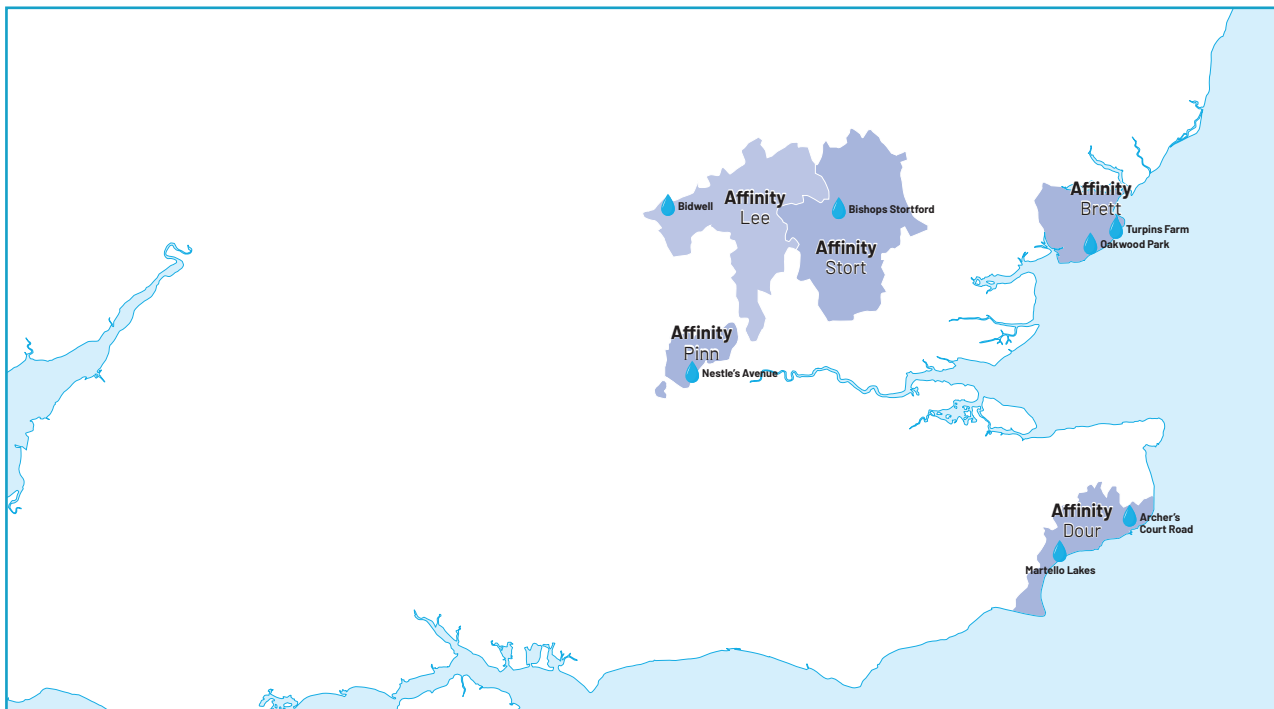


FIGURE 5.2 IWNL'S INSETS SHOWN IN AFFINITY WATER'S WRZ

TABLE 5.1 IWNL APPOINTMENTS WITHIN THE AFFINITY WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Oakwood Park	Clacton-on-Sea	Brett
Turpins Farm	Essex	Brett
Archer's Court Road	Kent	Dour
Martello Lakes	Hythe	Dour
Bidwell West	Houghton Regis	Lee
Bishop's Stortford	Hertfordshire	Stort
Nestle's Avenue	Hayes	Pinn



The bulk supply agreements with Affinity Water all state that we shall mirror the incumbent's drought response to conserve water in times of drought. Affinity Water's level of service (LoS) can be found in their full drought plan at <https://www.affinitywater.co.uk/corporate/plans/drought-management>

IWNL's level of service in the Affinity Water area are shown in Table 5.2 below.

TABLE 5.2 IWNL'S LEVELS OF SERVICE FOR AFFINITY WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	1 in 10 years (TUBs)
	1 in 40 years – 1 in 100 years (Low risk supply-side drought permits/orders)*
3	1 in 40 years (Demand side ordinary drought orders restricting non-essential use)
	> 1 in 100 years (Medium risk supply-side drought permits/orders)*
4	Deemed unacceptable but could be used for short periods of time in localised areas as a result of a civil emergency

*This frequency will change to 1 in >200 years post March 2024



Anglian Water



FIGURE 5.3 IWNL'S INSETS SHOWN IN ANGLIAN WATER'S WRZ



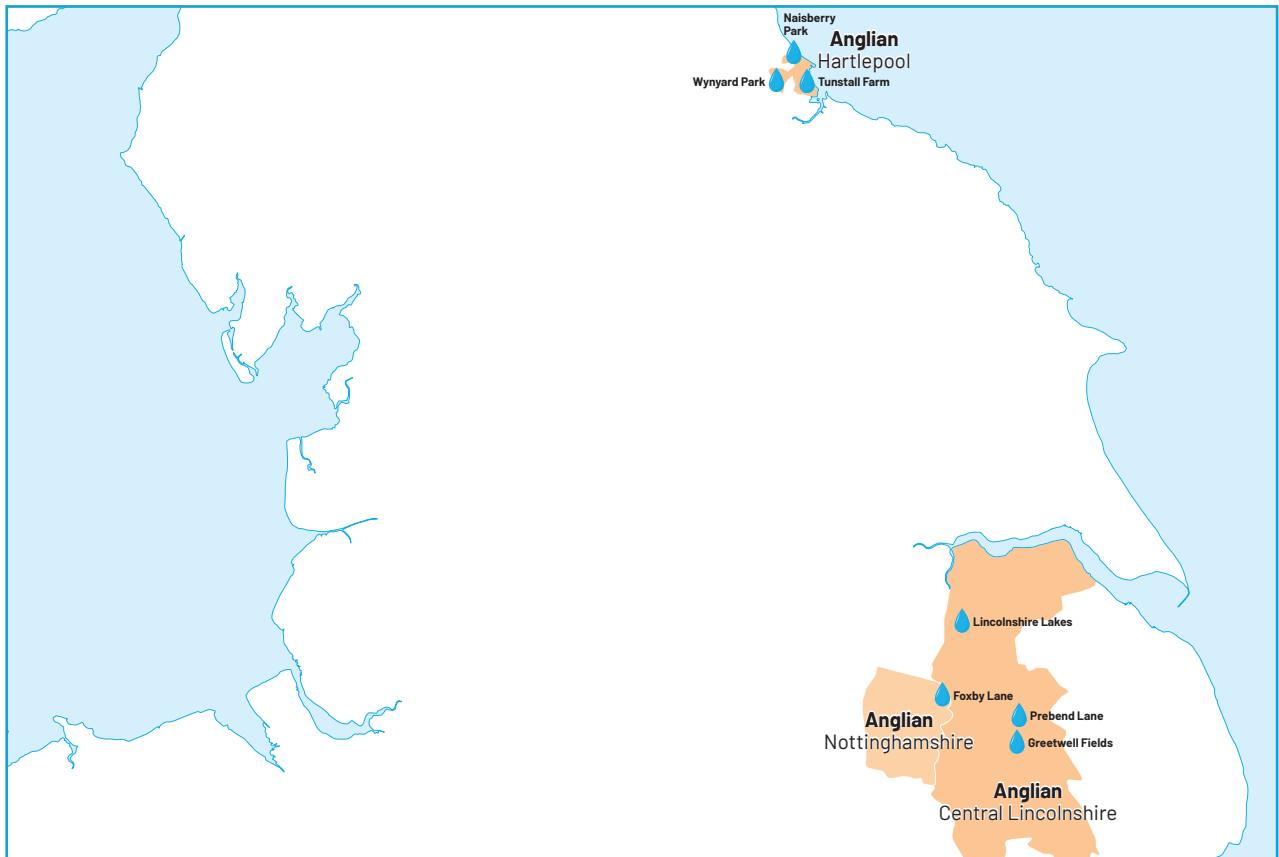


FIGURE 5.4 IWNL'S INSETS SHOWN IN ANGLIAN WATER'S NORTHERN WRZ



FIGURE 5.5 IWNL'S INSETS SHOWN IN ANGLIAN WATER'S SOUTHERN WRZ



IWNL have 32 bulk supply agreements with Anglian Water. These are located within 11 of Anglian Water's water resource zones, as shown in Table 5.3.

TABLE 5.3 IWNL APPOINTMENTS WITHIN THE ANGLIAN WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Greetwell Fields	Lincoln	Central Lincolnshire
Lincolnshire Lakes	Scunthorpe	Central Lincolnshire
Prebend Lane	Lincoln	Central Lincolnshire
Factory Lane	Essex	East Suffolk
Henley Road	Ipswich	East Suffolk
Thorney Green	Stowupland	East Suffolk
Naisberry Farm	Hartlepool	Hartlepool
Tunstall Farm	Hartlepool	Hartlepool
Wynyard Park	Hartlepool	Hartlepool
Ashfield Road	Elmswell	Ixworth
Colney Lane	Norwich	Norwich and the Broads
Green Lane East	Norwich	Norwich and the Broads
Manor Road	Norwich	Norwich and the Broads
Norwich Road	Norwich	Norwich and the Broads
Salhouse Road	Norwich	Norwich and the Broads
Salhouse Road, Sprowston	Norwich	Norwich and the Broads
Salhouse Road, Rackheath	Norwich	Norwich and the Broads
St Giles Park	Norwich	Norwich and the Broads
Foxby Lane	Lincolnshire	Nottinghamshire
Great Billing Way	Northampton	Ruthamford Central
Brooklands	Milton Keynes	Ruthamford Central
Yardley Road	Milton Keynes	Ruthamford Central
Ashby Road, Daventry	Daventry	Ruthamford North
Eastrea Road	Cambridgeshire	Ruthamford North
Long Croft Rd (Little Stanion)	Corby, Northants	Ruthamford North
Priors Hall	Corby, Northants	Ruthamford North
Rowtree Park	Northampton	Ruthamford North
Church Street, Langford	Bedfordshire	Ruthamford South
Clipstone Park	Leighton Buzzard	Ruthamford South
Cowdary Centre	Colchester	South Essex
Stone Path Drive	Essex	South Essex
Chilton Wood	Suffolk	Sudbury



The bulk supply agreements with Anglian Water all state that we shall mirror the incumbent's drought response to conserve water in times of drought. Anglian Water's level of service (LoS) can be found in their full drought plan at <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drought-plan/>

IWNL's level of service in the Anglian Water area are shown in Table 5.4 below.

TABLE 5.4 IWNL'S LEVELS OF SERVICE FOR ANGLIAN WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	10% annual average risk
3	2.5% annual average risk
4	<0.5% annual average risk



Bristol Water

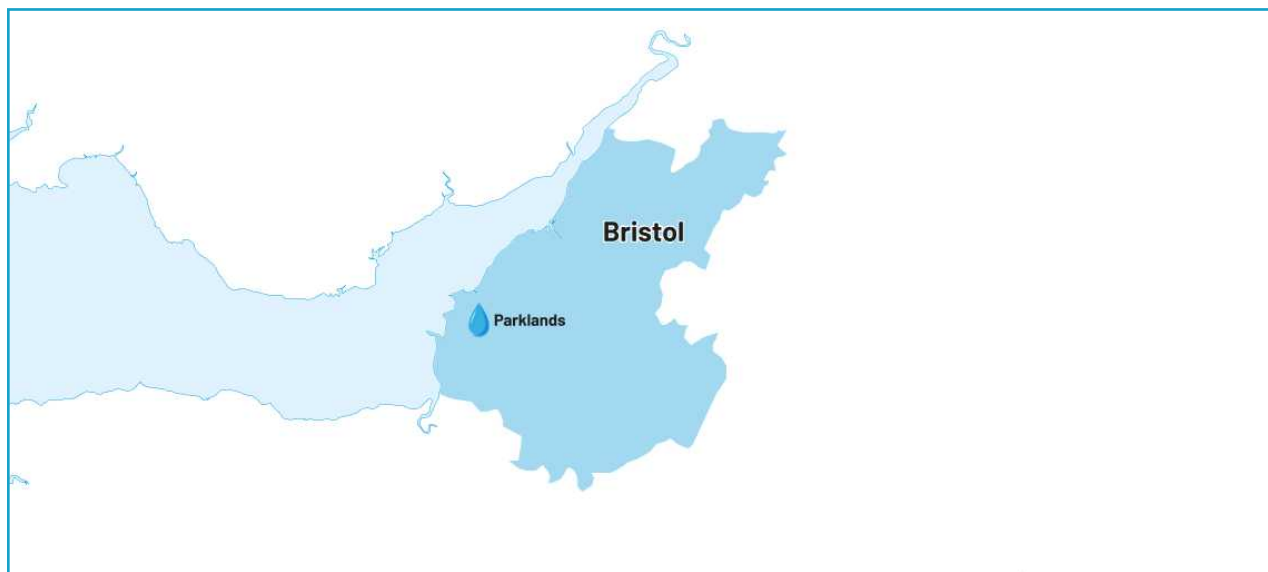


FIGURE 5.6 IWNL'S INSET SHOWN IN BRISTOL WATER'S WRZ

IWNL have one bulk supply agreement with Bristol Water which is located within Bristol Water's only water resource zone, as shown in Table 5.5.

TABLE 5.5 IWNL'S APPOINTMENT WITHIN THE BRISTOL WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Parklands	Weston-super-Mare	WRZ

The bulk supply agreement with Bristol Water states that we shall mirror the incumbent's drought response to conserve water in times of drought. Bristol Water's level of service (LoS) can be found in their full drought plan at <https://www.bristolwater.co.uk/about-us/planning-for-drought/>

IWNL's level of service in the Bristol Water area are shown in Table 5.6 below.

TABLE 5.6 IWNL'S LEVELS OF SERVICE FOR BRISTOL WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	1 in 15 years on average
3	1 in 33 years on average
4	1 in 200 years on average



Cambridge Water



FIGURE 5.7 IWNL’S INSETS SHOWN IN CAMBRIDGE WATER’S WRZ

IWNL have one bulk supply agreement with Cambridge Water which is located within Cambridge Water’s only water resource zone, as show in table 5.7.

TABLE 5.7 IWNL’S APPOINTMENTS WITHIN THE CAMBRIDGE WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Newmarket Road	Cambridge	Cambridge

The bulk supply agreement with Cambridge Water states that we shall mirror the incumbent’s drought response to conserve water in times of drought. Cambridge Water’s level of service (LoS) can be found in their full drought plan at <https://www.cambridge-water.co.uk/about-us/our-strategies-and-plans/our-drought-plan>

IWNL’s level of service in the Cambridge Water area are shown in Table 5.8 below.

TABLE 5.8 IWNL’S LEVELS OF SERVICE FOR CAMBRIDGE WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	1 in 20 years
3	1 in 50 years
4	1 in 100 years or less frequently



Essex and Suffolk Water



FIGURE 5.8 IWNL'S INSET SHOWN IN ESSEX AND SUFFOLK WATER'S WRZ

IWNL have three bulk supply agreement with Essex and Suffolk Water. These are located within Essex and Suffolk Water's Essex water resource zone, as show in table 5.9 below.

TABLE 5.9 IWNL'S APPOINTMENTS WITHIN THE ESSEX AND SUFFOLK WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Limebrook Way	Maldon	Essex
Marsh Road	Essex	Essex
Maylons Lane	Essex	Essex

The bulk supply agreements with Essex and Suffolk Water states that we shall mirror the incumbent's drought response to conserve water in times of drought. Essex and Suffolk Water's level of service (LoS) can be found in their full drought plan at <https://www.nwg.co.uk/droughtplan>

IWNL's level of service in the Essex and Suffolk Water area are shown in Table 5.10 below.

TABLE 5.10 IWNL'S LEVELS OF SERVICE FOR ESSEX AND SUFFOLK WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	1 in 10 years
2	1 in 20 years
3	1 in 50 years
4	1 in 250 years



Northumbrian Water



FIGURE 5.9 IWNL'S INSETS SHOWN IN NORTHUMBRIAN WATER'S WRZ

IWNL have six bulk supply agreements with Northumbrian Water. These are located within Northumbrian Water's Kielder water resource zone, as shown in table 5.11 below.

TABLE 5.11 IWNL'S APPOINTMENT WITHIN THE NORTHUMBRIAN WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Blakeston Lane	Stockton-on-Tees	Kielder
Chester Road	Tyne and Wear	Kielder
Edderacres Walk	Wingate	Kielder
Lambton Park	Chester-le-Street	Kielder
Percy Drive	Amble	Kielder
Throckley	Newcastle upon Tyne	Kielder

The bulk supply agreement with Northumbrian Water states that we shall mirror the incumbent's drought response to conserve water in times of drought. Northumbrian Water's level of service (LoS) can be found in their full drought plan at <https://www.nwg.co.uk/droughtplan>

IWNL's level of service in the Northumbrian Water area are shown in Table 5.12 below. Currently, Northumbrian Water are working towards increasing the resistance of level 4 restrictions to a 1 in 500-year occurrence by 2039.



TABLE 5.12 IWNL'S LEVELS OF SERVICE FOR NORTHUMBRIAN WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	1 in 20 years
2	1 in 150 years
3	1 in 200 years
4	1 in 250 years

Portsmouth Water

**FIGURE 5.10 IWNL'S INSETS SHOWN IN PORTSMOUTH WATER'S WRZ**

IWNL have four bulk supply agreements with Portsmouth Water. These are located within Portsmouth Water's only water resource zone, as shown in table 5.13 below.

TABLE 5.13 IWNL'S APPOINTMENT WITHIN THE PORTSMOUTH WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Harbour Place	Havant	Portsmouth
Shopwhykes Lakes	West Sussex	Portsmouth
The Spires	Chichester	Portsmouth
Windmill Views	Haddenham	Portsmouth



The bulk supply agreement with Portsmouth Water states that we shall mirror the incumbent's drought response to conserve water in times of drought. Portsmouth Water's level of service (LoS) can be found in their full drought plan at <https://www.portsmouthwater.co.uk/news/publications/water-resources-planning/>

IWNL's level of service in Portsmouth Water area are shown in Table 5.14 below.

TABLE 5.14 IWNL'S LEVELS OF SERVICE FOR PORTSMOUTH REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	>1 in 20 years
3	>1 in 80 years
4	>1 in 200 years

Severn Trent Water



FIGURE 5.11 IWNL'S INSETS SHOWN IN SEVERN TRENT WATER'S WRZ

IWNL have five bulk supply agreements with Severn Trent Water. One is supplied via a bulk supply they have with Anglian Water which is within Anglian Water's Ruthamford North water resource zone. The other four are located within two of Severn Trent Water's water resource zones, as shown in Table 5.15.



TABLE 5.15 IWNL APPOINTMENTS WITHIN THE SEVERN TRENT WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Phase 4, Southend Lane	Newent	Forest and Stroud
Oakham North	Rutland	Ruthamford North (Anglian Water)
Blythe Valley	Solihull	Strategic Grid
Europa Way	Royal Leamington Spa	Strategic Grid
Nightingale Quarter	Derby	Strategic Grid

The bulk supply agreements with Severn Trent Water state that we shall mirror the incumbent's drought response to conserve water in times of drought. Severn Trent Water's level of service (LoS) can be found in their full drought plan at <https://www.severntrent.com/about-us/our-plans/>

IWNL's level of service in the Severn Trent Water area are shown in Table 5.16 below.

TABLE 5.16 IWNL'S LEVELS OF SERVICE FOR SEVERN TRENT WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	>3 in 100 years
3	1 in 100 years
4	-



South East Water



FIGURE 5.12 IWNL'S INSETS SHOWN IN SOUTH EAST WATER'S WRZ

IWNL have six bulk supply agreements with South East Water. These are located within four of South East Water's water resource zones, as shown in Table 5.17.

TABLE 5.17 IWNL APPOINTMENTS WITHIN THE SOUTH EAST WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Turners Hill Road	West Sussex	WRZ03
Watery Lane	Church Crookham	WRZ04
Sportsman's Farm	Kings Hill	WRZ06
Sutton Road	Langley	WRZ06
Chilmington Green	Ashford	WRZ08
Cockerling Road	Canterbury	WRZ08

The bulk supply agreement with South East Water states that we shall mirror the incumbent's drought response to conserve water in times of drought. South East Water's level of service (LoS) can be found in their full drought plan at <https://corporate.southeastwater.co.uk/news-info/publications/drought-plans/>

IWNL's level of service in the South East Water area are shown in Table 5.18 below.



TABLE 5.18 IWNL'S LEVELS OF SERVICE FOR SOUTH EAST WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	No more than 1 in 10 years
3	No more than 1 in 40 years
4	-

Southern Water

**FIGURE 5.13 IWNL'S INSETS SHOWN IN SOUTHERN WATER'S WRZ**

IWNL have five bulk supply agreements with Southern Water. These supply agreements are located within three of Southern Water's water resource zones, as shown in table 5.19.

TABLE 5.19 IWNL APPOINTMENTS WITHIN THE SOUTHERN WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Otterham Quay Lane	Kent	Medway Kent
Deer Park	Southampton	Southampton East, Hampshire
North Whiteley	Curbridge	Southampton East, Hampshire
Stoneham Lane	Eastleigh	Southampton East, Hampshire
NES Crawley	Crawley	Sussex North



The bulk supply agreement with Southern Water states that we shall mirror the incumbent's drought response to conserve water in times of drought. Southern Water's level of service (LoS) can be found in their full drought plan at <https://www.southernwater.co.uk/our-story/water-resources-planning/our-drought-plan>

IWNL's level of service in the Southern Water area are shown in Table 5.20 below.

TABLE 5.20 IWNL'S LEVELS OF SERVICE FOR SOUTHERN WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	1 in 5 years
2	1 in 10 years
3	1 in 20 years
4	1 in >500 years

South Staffs Water



FIGURE 5.14 IWNL'S INSETS SHOWN IN SOUTH STAFFS WATER'S WRZ

IWNL have a bulk supply agreement with South Staffs Water which is located within South Staffs Water's water resource zone, as show in table 5.21 below.

TABLE 5.21 IWNL'S APPOINTMENT WITHIN THE SOUTH STAFFS AND CAMBRIDGE WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Ashby Road, Tamworth	Tamworth	South Staffs



The bulk supply agreement with South Staff Water states that we shall mirror the incumbent’s drought response to conserve water in times of drought. South Staffs Water’s level of service (LoS) can be found in their full drought plan at <https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-drought-plan>

IWNL’s level of service in the South Staffs Water area are shown in Table 5.22 below.

TABLE 5.22 IWNL’S LEVELS OF SERVICE FOR SOUTH STAFFS WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	1 in 40 years
3	1 in 80 years
4	Not anticipated, <1 in 200 years

Thames Water

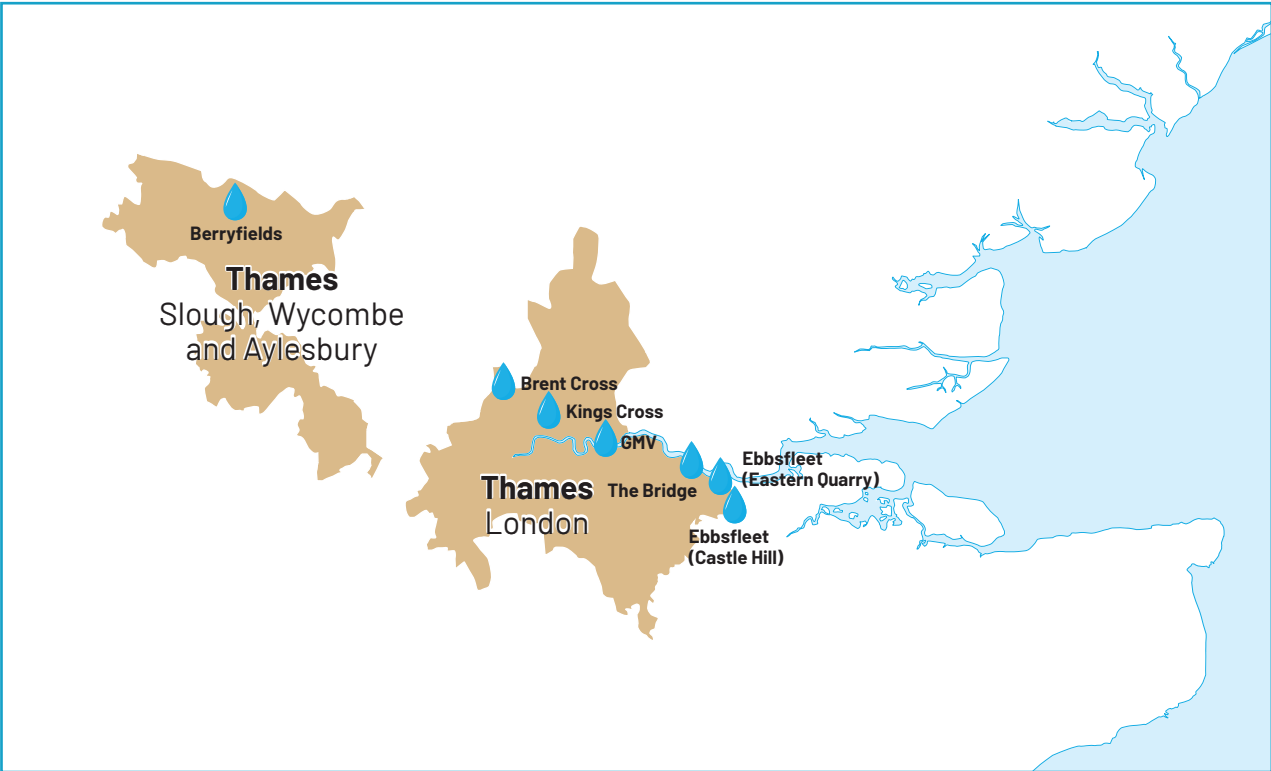


FIGURE 5.15 IWNL’S INSETS SHOWN IN THAMES WATER’S WRZ

IWNL have seven bulk supply agreements with Thames Water, these supply agreements cover two discrete Thames Water resource zones, Slough, Wycombe and Aylesbury and London, as shown in Table 5.23.

TABLE 5.23 IWNL APPOINTMENTS WITHIN THE THAMES WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Berryfields	Aylesbury	Slough, Wycombe and Aylesbury
Brent Cross Phase 1a.1	London	London
Ebbsfleet, Castle Hill	London	London
Ebbsfleet, Eastern Quarry	London	London
GMV	Dartford	London
King's Cross Central	Greenwich	London
The Bridge	Swanscombe	London

The bulk supply agreements with Thames Water all state that we shall mirror the incumbent's drought response to conserve water in times of drought. Thames Water's level of service (LoS) can be found in their full drought plan at <https://www.thameswater.co.uk/about-us/regulation/drought-plan>

IWNL's level of service in the Thames Water area are shown in Table 5.24 below.

TABLE 5.24 IWNL'S LEVELS OF SERVICE FOR THAMES WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	1 in 5 year on average
2	1 in 10 year on average
3	1 in 20 year on average
4	Never



Yorkshire Water

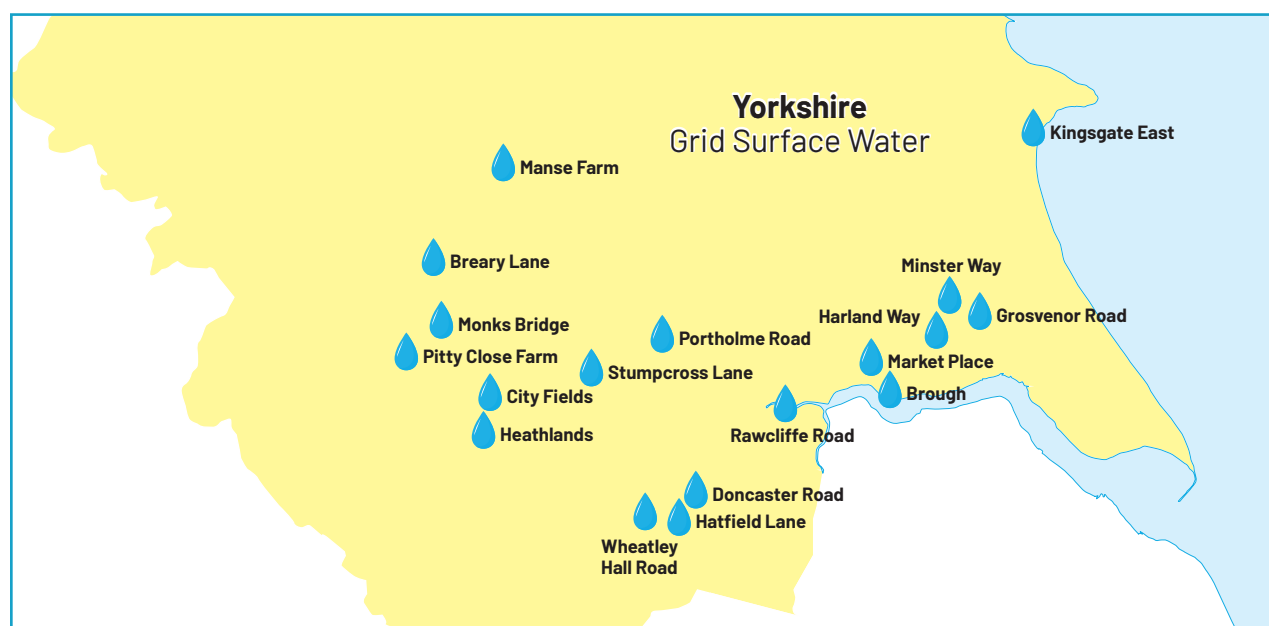


FIGURE 5.16 IWNL'S INSETS IN YORKSHIRE WATER'S WRZ

IWNL have 19 bulk supply agreements with Yorkshire Water. These are located within Yorkshire Water's Grid Surface water resource zone, as show in table 5.25 below.

TABLE 5.25 IWNL'S APPOINTMENT WITHIN THE YORKSHIRE WATER REGION

IWNL WRZ	LOCATION	INCUMBENT WRZ
Breary Lane	Leeds	Grid Surface
Brough	Brough	Grid Surface
City Fields	Wakefield	Grid Surface
Church Lane	Scarborough	Grid Surface
Doncaster Road	Doncaster	Grid Surface
Grosvenor Road	Hull	Grid Surface
Harland Way	North Humberside	Grid Surface
Hatfield Lane	South Yorkshire	Grid Surface
Heathlands	Brough	Grid Surface
Kingsgate East Phase	North Yorkshire	Grid Surface
Manse Farm	Knaresborough	Grid Surface
Market Place	North Humberside	Grid Surface
Minster Way	Beverley	Grid Surface
Monks Bridge	Leeds	Grid Surface
Pitty Close Farm	Drighlington	Grid Surface
Portholme Road	North Yorkshire	Grid Surface
Rawcliffe Road	Yorkshire	Grid Surface
Stumpcross Lane	Pontefract	Grid Surface
Wheatley Hall Road	South Yorkshire	Grid Surface

The bulk supply agreement with Yorkshire Water states that we shall mirror the incumbent's drought response to conserve water in times of drought. Yorkshire Water's level of service (LoS) can be found in their full drought plan at <https://www.yorkshirewater.com/resources/>

IWNL's level of service in the Yorkshire Water area are shown in Table 5.26 below.

TABLE 5.26 IWNL'S LEVELS OF SERVICE FOR YORKSHIRE WATER REGION

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	1 in 25 years
3	1 in 80 years
4	1 in 500 years



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Section Six:

Demand Management



6.0 Demand Management

As IWNL cannot adopt any supply side management we would therefore rely on demand side management during any restrictions of use, whilst working with the incumbents to minimise the length of any restrictions.

The areas served by IWNL benefit from newly installed infrastructure and therefore leakage levels are very low when compared with other water companies in England and Wales. In our inset applications, IWNL has agreed target rates for “unaccounted-for-water” of 5% of distribution input. Most of this will be leakage and the terms “leakage” and “unaccounted-for water” are taken as synonymous in the context of our supply-demand balance.

Water efficiency is an integral part of resource planning and IWNL has a statutory duty to promote the efficient use of water. Key to this is support for customer behavioural change. We believe that it is important to support and assist customers with these changes and this will be the key strand of our work during the period along with promoting our environmental policy objectives. All new buildings will be designed with water efficiency in mind.

All IWNL’s properties are metered. Customer consumption from meter reads is monitored to either investigate for leakage or issue letters to customers advising that they are high users along with tips on being water wise.

IWNL’s company publication entitled “Using water wisely at home” sets out a programme of water efficiency initiatives that focus on education, advice and raising awareness. This publication is provided free to every new customer and is available to view on the IWNL website.

IWNL issues Summer and Winter newsletters to all our domestic customers which include details on detecting leaks and water wise tips.

All bills include a table to show customers where their water consumption compares to industry averages for number of occupants, this additional information will enable customers to control their own usage.

Call centre agents are trained on how to discuss/direct customers to our water wise sections of the website and how to talk customers through leak detection techniques.

IWNL promote water efficiency through working with house builders to adopt the Code for Sustainable Homes, therefore residents who are supplied by IWNL already live in homes with high levels of water efficiency.

During the next 5 years, IWNL will monitor and utilise site-specific consumption data to target the delivery of water-efficiency messages to our customers in specific zones and use metering data to evaluate the efficacy of these messages. In a drought, IWNL will utilise our metering data to target high-usage customers. We do not currently know the impact this will have on overall usage but are committed to developing this strategy going forwards.



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Section Seven:

Environmental Impacts





7.0 Environmental Impacts

IWNL do not operate any of its own resources and therefore our impact to the environment in which we all live are smaller than an incumbent water company.

For each area served an environmental impact assessment is completed prior to a licence being granted by OFWAT to ensure that the water we supply does not detrimentally affect the environment.

The Group has an environmental policy, which has been ratified by the Board that outlines how we limit our environmental impacts.

While the company will work closely with the incumbent water company as appropriate, given that it will not be operating any abstraction sources it is not considered necessary to address environmental mitigation specifically within this Drought Plan.



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Section Eight:

List of Appendices



8.0 List of Appendices

Below is a list of Appendices which support IWNL's Draft Drought Plan 2021:

Appendix A:	Differences between WRMP19 and Drought Plan 2021
Appendix B:	Communication Examples
Appendix C:	Testing IWNL's Drought Triggers
Appendix D:	Lessons Learnt 2020

These are available online at <https://www.iwnl.co.uk/useful-documents/>

