Independent Water Networks

Drought Plan 2021

OCTOBER 2021

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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.

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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 2020 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.

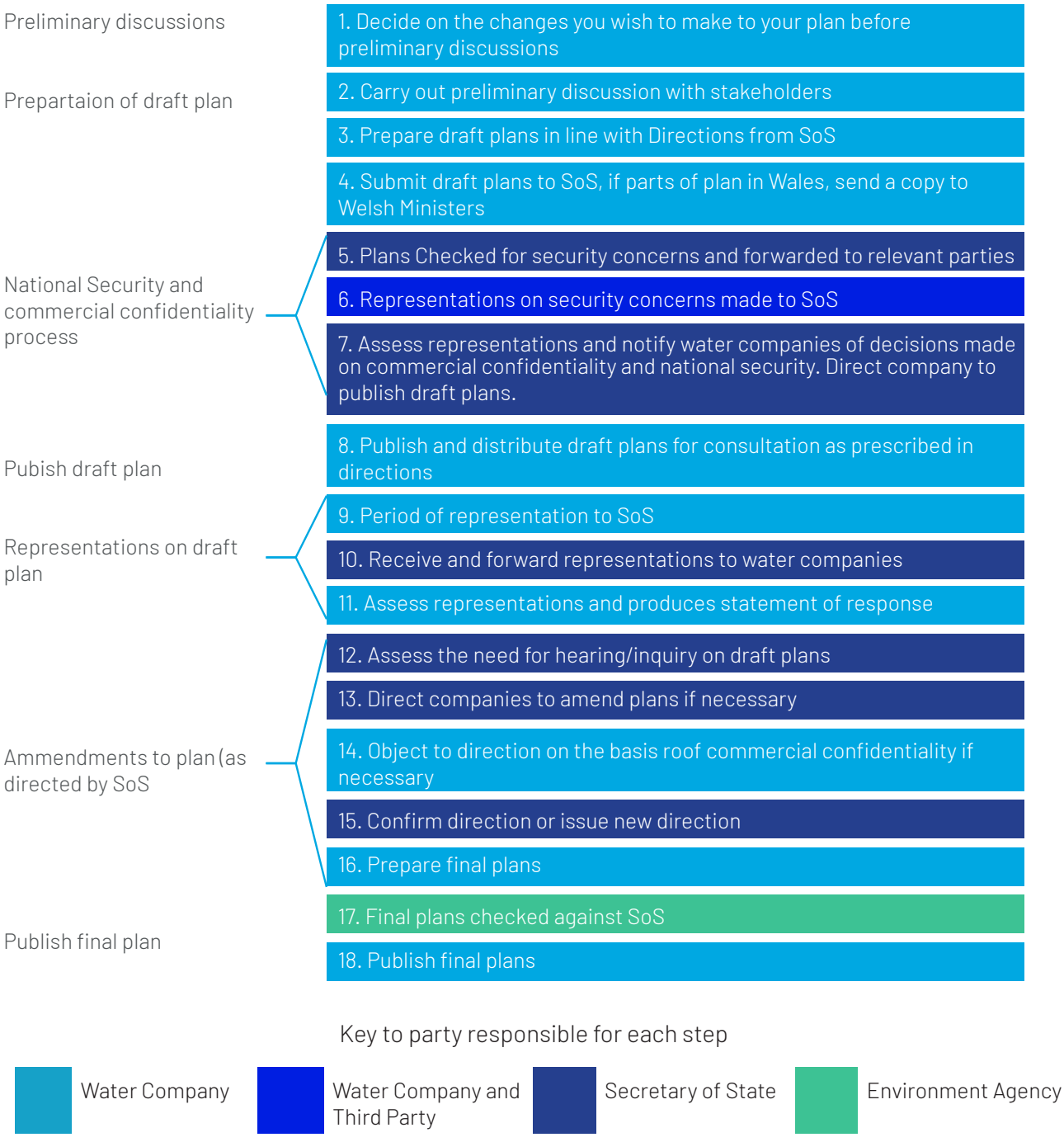

FIGURE 1.1 STATUTORY PROCESS FOR THE DEVELOPMENT OF A DROUGHT PLAN

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. IWNL consulted with the following groups:

- 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

A total of three written representations were received from The Environment Agency, Natural England and an IWNL customer; this report has taken these representations into account. All amendments made to the draft Drought Plan as a result of these responses are summarised in our "Statement of Response, Draft Drought Plan 2021" document, which is available on our website.

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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	This level of drought is outside the scope of the drought plan and will be managed using our emergency plan 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** • IWNL Head of Regulations and Compliance	**IWNL** • Water Compliance Scientist	Normal programme of: • Liaison with incumbent's wholesale/NAV manager • Leakage detection and repair • Water efficiency work
Level 1 (Developing Drought)	1	**IWNL Senior Manager** • This may be: • IWNL Head of Regulations and Compliance • IWNL Head of Water Asset Management Operations • IWNL Head of Asset Delivery	IWNL • 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	• Media/water efficiency campaign – 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 – 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** • IWNL Water Networks Director	**As above plus** • IWNL Water Networks Director • BUUK Managing Director of Markets • BUUK Regulations Director	• 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** • BUUK Managing Director of Markets	**As above plus IWNL Board:** • BUUK CEO • BUUK Chief Financial Officer	• 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 • Implementation of Extreme Drought Management Actions

DROUGHT CLASSIFICATION LEVEL	IWNL'S LEVEL OF SERVICE	DROUGHT EVENT CONTROLLER	DROUGHT MANAGEMENT TEAM	SUMMARY OF ACTIONS
Level 4 (Severe Drought)	4	**BUUK CEO**	• **As above**	• Follow guidance set out in IWNL's emergency plans regarding drought events
N/A	Return to Normal Service	**IWNL Senior Manager** This may be: • IWNL Head of Regulations and Compliance • IWNL Head of Asset Operations • IWNL Head of Asset Delivery	**IWNL** • Water Networks Director • IWNL Head of Regulations and Compliance • IWNL Head of Asset Operations • IWNL Head Asset Delivery • Water Compliance Scientist • Network Performance Analyst **BUUK** • Customer Services Manager • Marketing Manager	• 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: • 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

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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.

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's drought actions rely on effective communications with the affected customers and demand side actions.

3.1 Exemptions

IWNL 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.

It is expected that this would be delivered within a month of notification although the exact date would depend on the incumbent's planned release date. The media campaign would be updated as the event changes with new information and data.

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. Planning would start during the Media Campaign stage and IWNL would match the incumbent's consultation date, to ensure consistency.

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 are to be used before Level 4 Emergency Drought Orders. These actions will be implemented after Level 3 actions (NEUBs) to prevent Level 4 actions, such as the authorisation of rota cuts. These actions are practical to implement during an extreme drought and are likely to be temporary measures.

Due to the variability of a drought, the order and prioritisation of the extreme drought management actions will be reviewed on a case-by-case basis to determine the best action to the specific WRZ. This review will be carried out by those involved in table 2.3 for level 3. A summary of these extreme drought actions can be found below.

TABLE 3.1 EXTREME DROUGHT MANAGEMENT ACTIONS

TYPE OF ACTION	SUMMARY OF ACTION	APPROXIMATE LEAD TIME
Customer communication	Informing high consumption customers of the need to reduce their water	1 - 2 months
	Increased frequency of customer communication	1 - 2 months
	Focus customer communication on areas which have the biggest water savings e.g showers	1 - 2 months
	Produce guides for customers as to how they can reduce their usage to 50 liter/person/day	1 - 2 months
	"Day Zero" concept water campaigns	1 - 2 months
Monitoring	Ask customers to self-report meter readings	1-2 months
	Increase frequency of meter reads	1-3 months
	Increase monitoring of data loggers	1-2 months
Incumbent Communication	Increased communication	1 month
	Sharing of information, data and incumbent's customer communications which can be passed onto IWNL customers	1-3 months
Network Maintenance	Focus resources on fixing leaks and leakage prevention	1-3 months
Tankering	Commission and use of water tankers	1-3 months
Removal of exceptions	Consider the removal of all exceptions under any Temporary Use Bans (TUBs) or Non-Essential Use Bans (NEUBs)	1-3 months

IWNL will mirror our incumbent water supplier extreme drought management actions where we can, for example match the release date of shared customer communication. 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.

The specific details of these actions are still in the process of being assessed. IWNL will continue to review these actions through further work on drought scenarios and discussions with incumbents on drought actions.

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 trigged 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.

IWNL will mirror our incumbent water supplier emergency actions where we can. The water imported into IWNL sites will reduce through these self-imposed restrictions. 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.

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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	• General water efficiency messages • Targeted media campaigns for resource zones with higher than expected water usage	• General water efficiency messages
Level 1 (Developing Drought)	IWNL's Level of Service 1	• 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	• Media/water efficiency campaign • Water efficiency promotions • Appeal for restraint
Level 2 (Drought)	IWNL's Level of Service 2	• 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	• 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	• 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	• 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	• Full media campaign to reflect the ongoing severity of the situation • Full media campaign with direct appeals for compliance	• 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	• Media campaign that restrictions are lifted and thank them for their support • Publish review of drought measures following the event	• 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.

INDIVIDUAL NEEDS REGISTER

In the event of a drought, we will aim to minimise any possible impacts on customers who are on our Individual Needs 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.

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. However, most incumbent suppliers have stated that they would not reduce bulk supplies less than 1Ml/d; all IWNL bulk supply agreements are less than this volume so IWNL are not anticipating that these volumes will decrease.

As IWNL do not operate our own sources, supply side management is wholly under the control of the supplying company. IWNL will 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

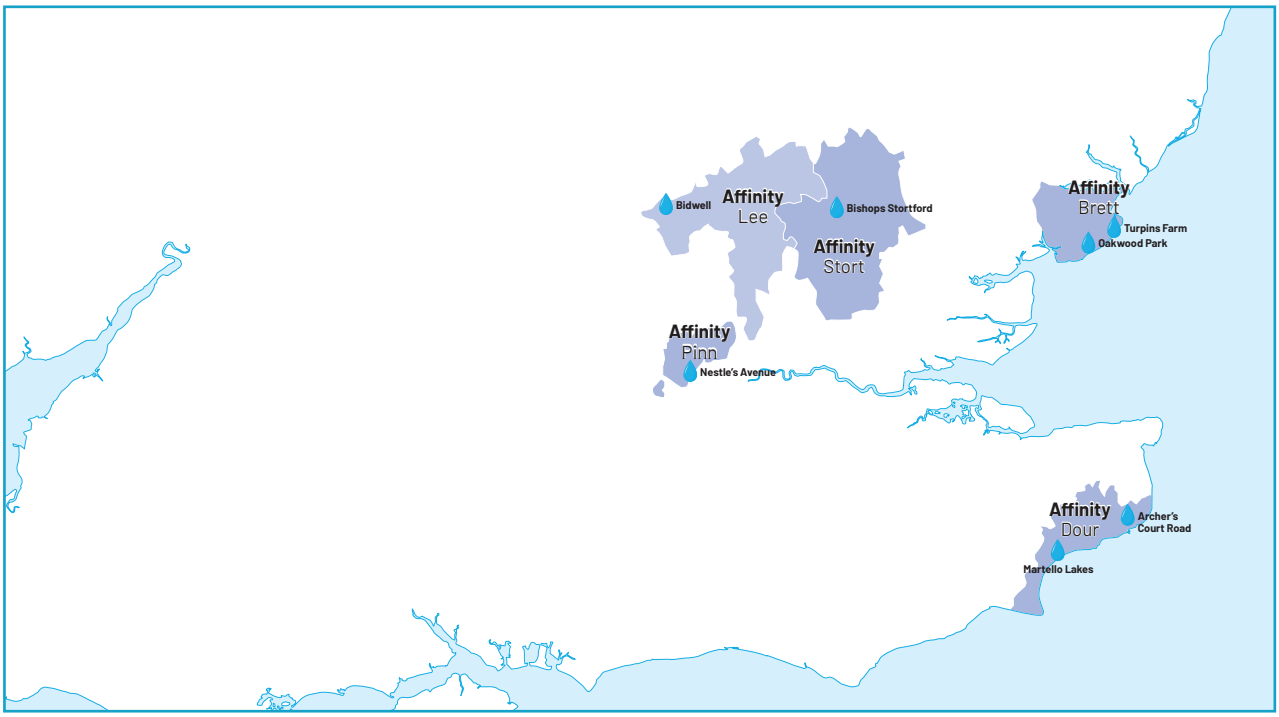

FIGURE 5.2 IWNL'S INSETS SHOWN IN AFFINITY WATER'S WRZ

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

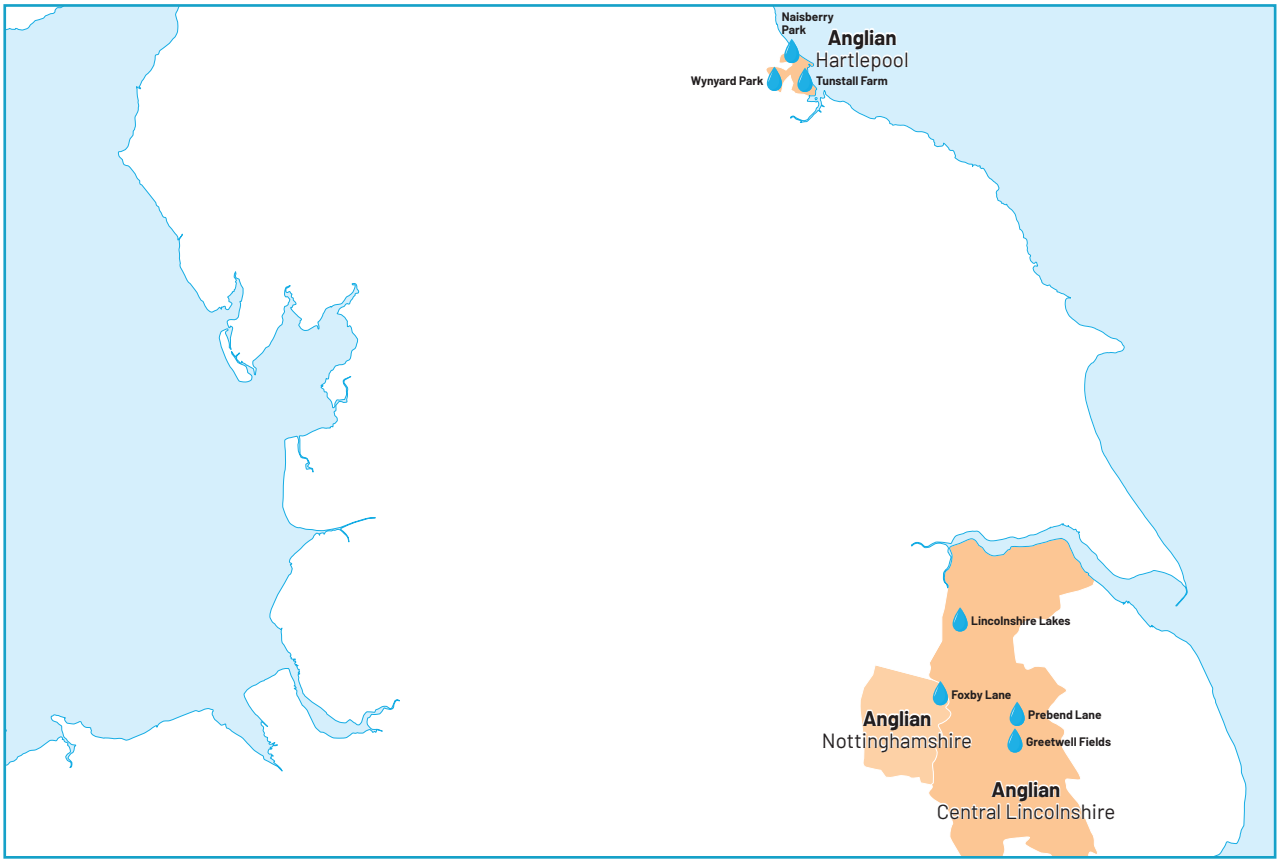

FIGURE 5.4 IWNL'S INSETS SHOWN IN ANGLIAN WATER'S NORTHERN WRZ

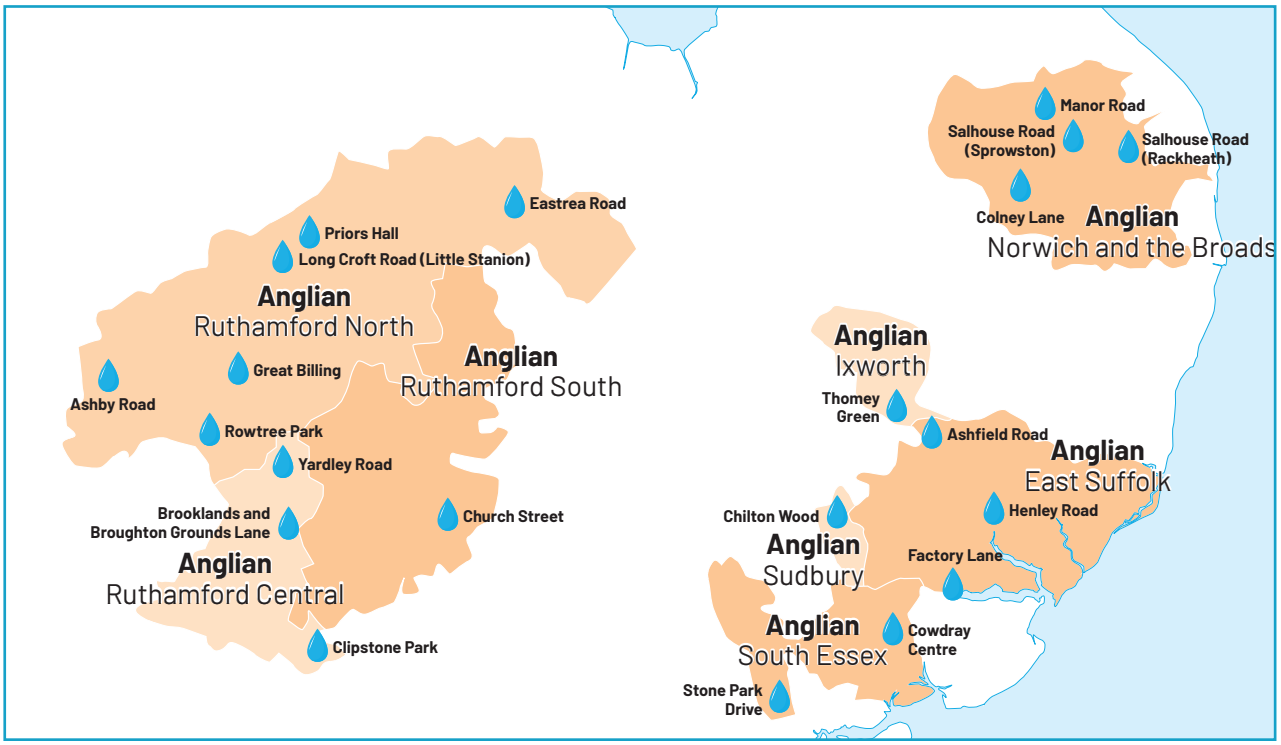

FIGURE 5.5 IWNL'S INSETS SHOWN IN ANGLIAN WATER'S SOUTHERN WRZ

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

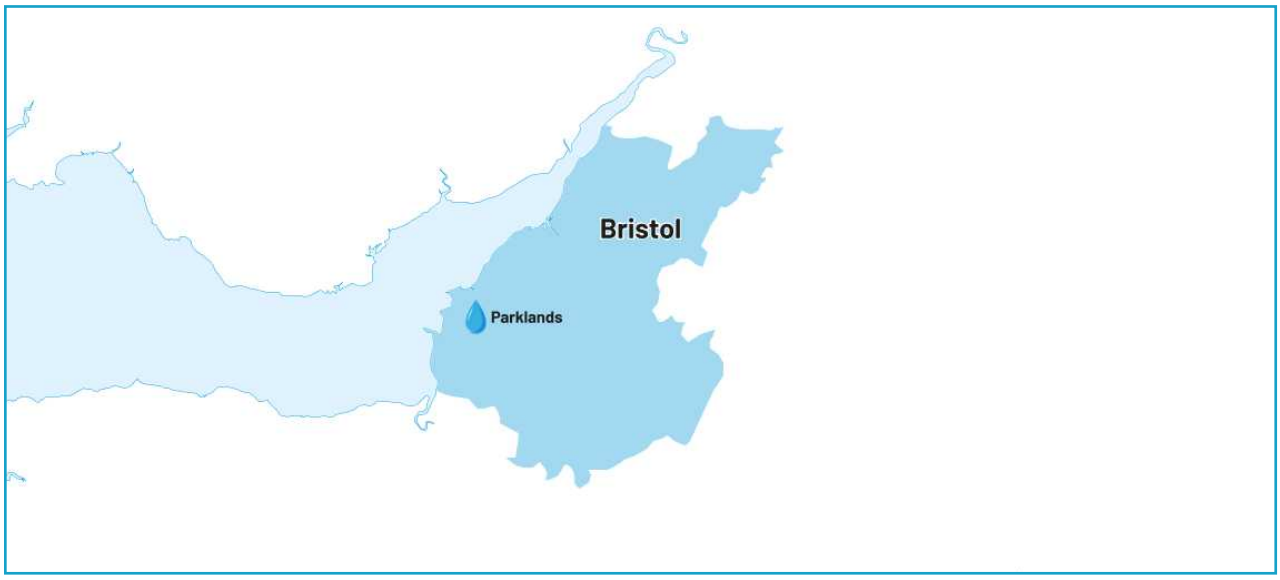

FIGURE 5.6 IWNL'S INSET SHOWN IN BRISTOL WATER'S WRZ

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

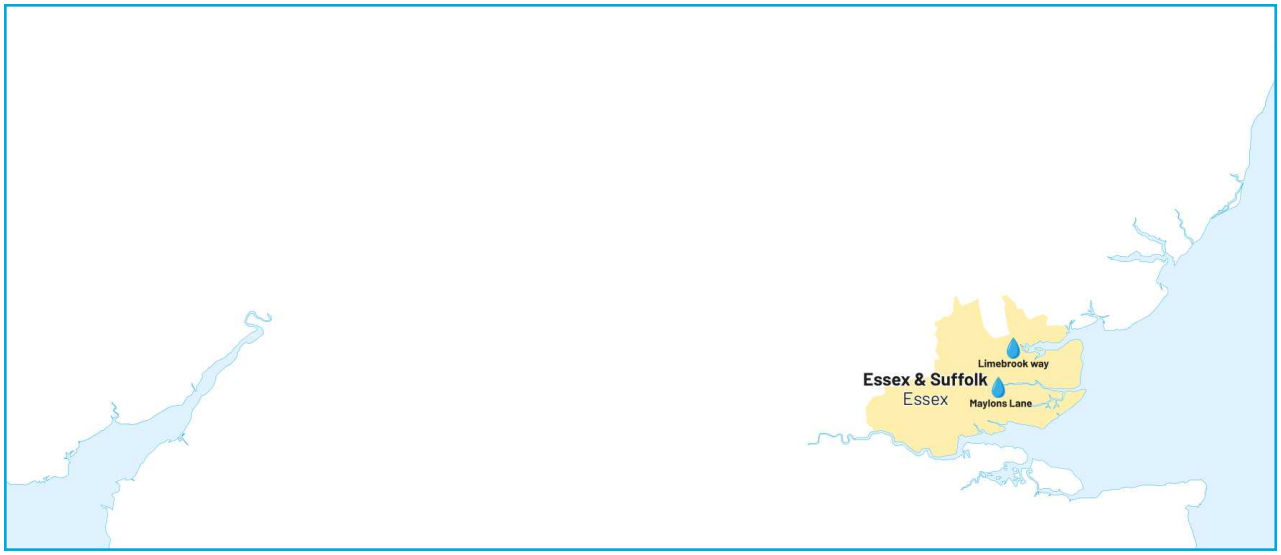

FIGURE 5.8 IWNL'S INSET SHOWN IN ESSEX AND SUFFOLK WATER'S WRZ

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 show 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 athttps://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 show 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

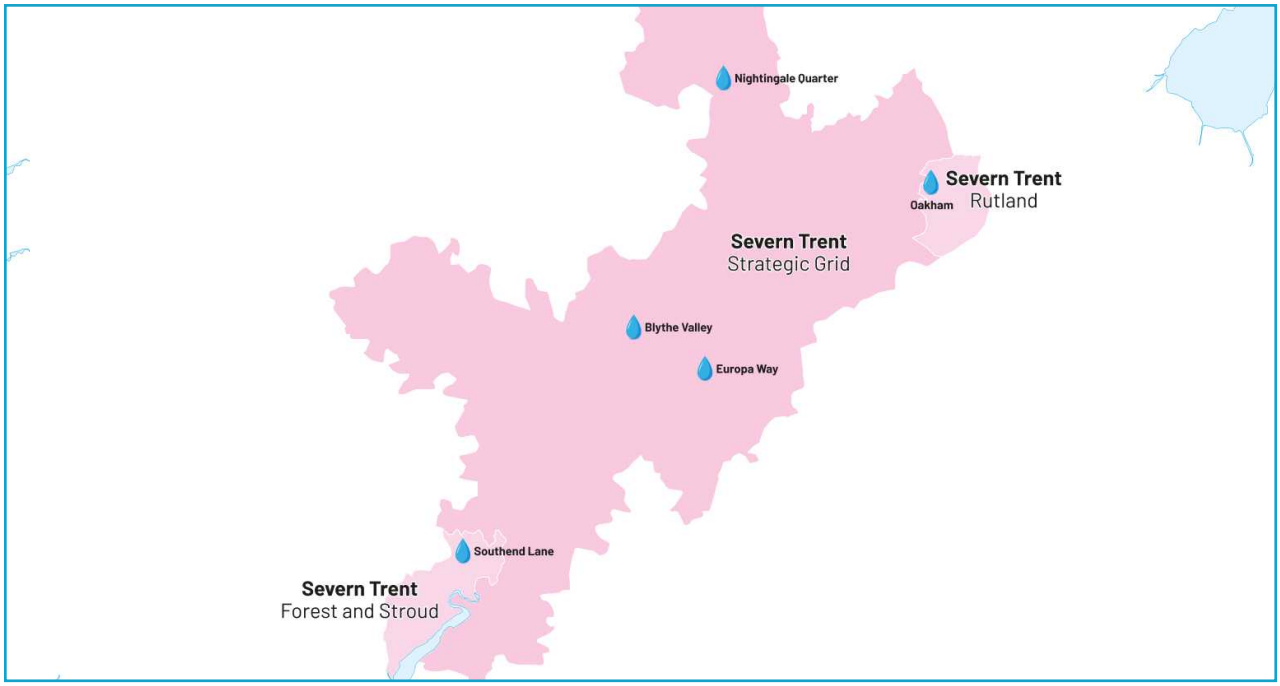

FIGURE 5.11 IWNL'S INSETS SHOWN IN SEVERN TRENT WATER'S WRZ

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
Cockering 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

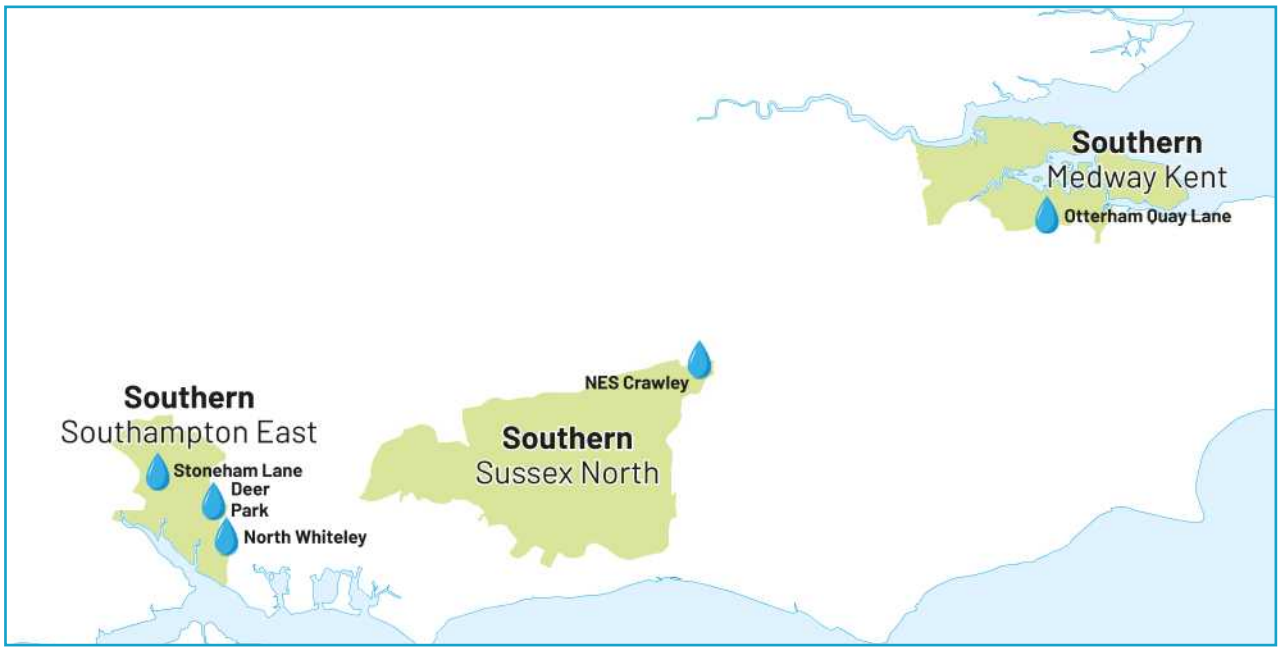

FIGURE 5.13 IWNL'S INSETS SHOWN IN SOUTHERN WATER'S WRZ

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

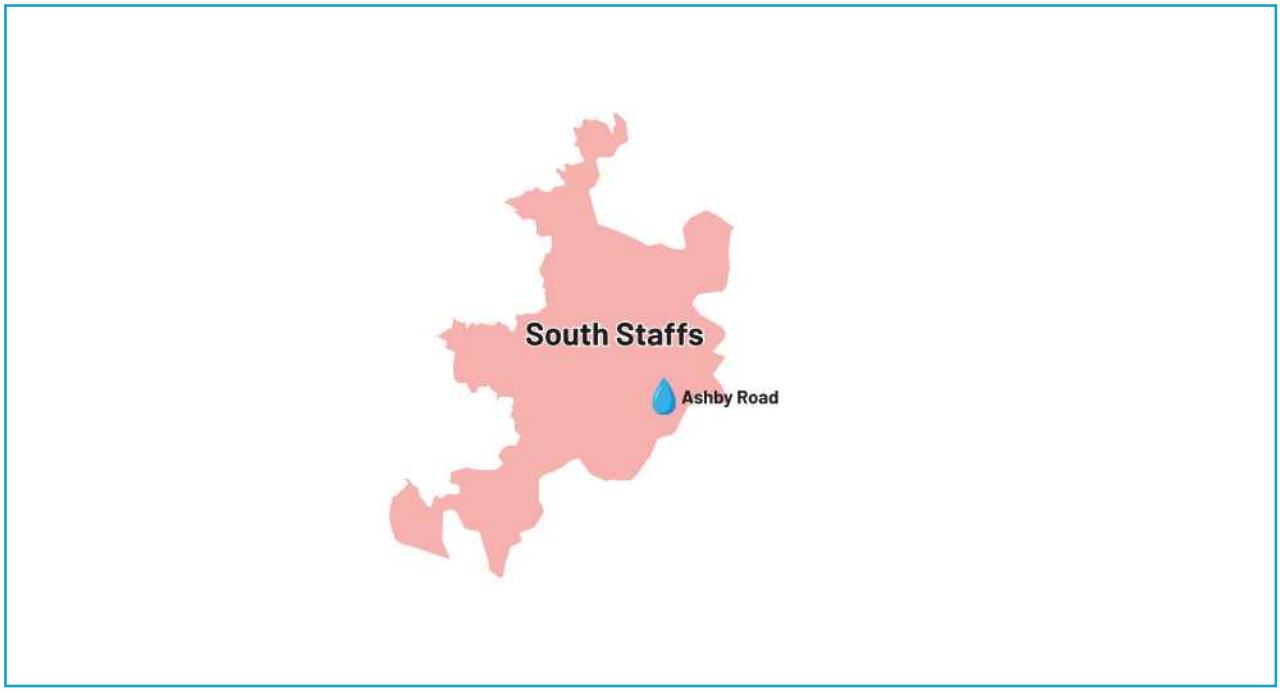

FIGURE 5.14 IWNL'S INSETS SHOWN IN SOUTH STAFFS WATER'S WRZ

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

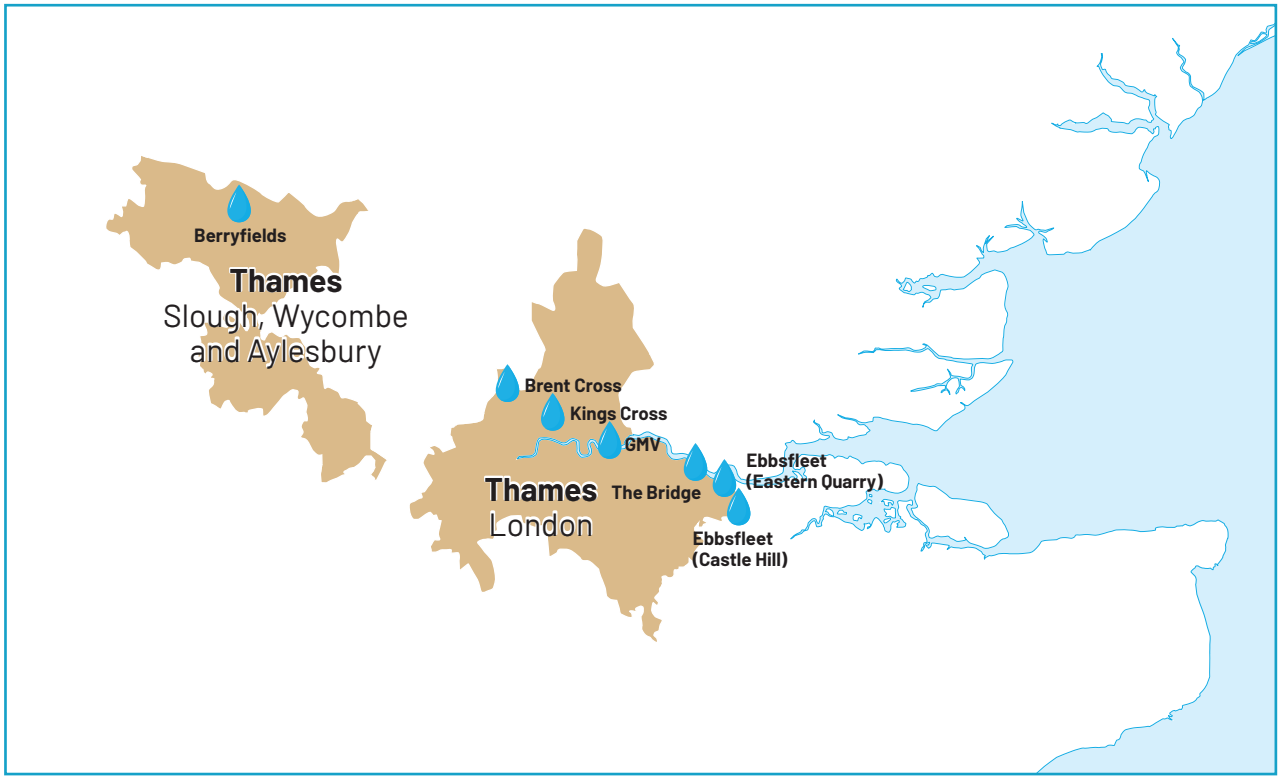

FIGURE 5.15 IWNL'S INSETS SHOWN IN THAMES WATER'S WRZ

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

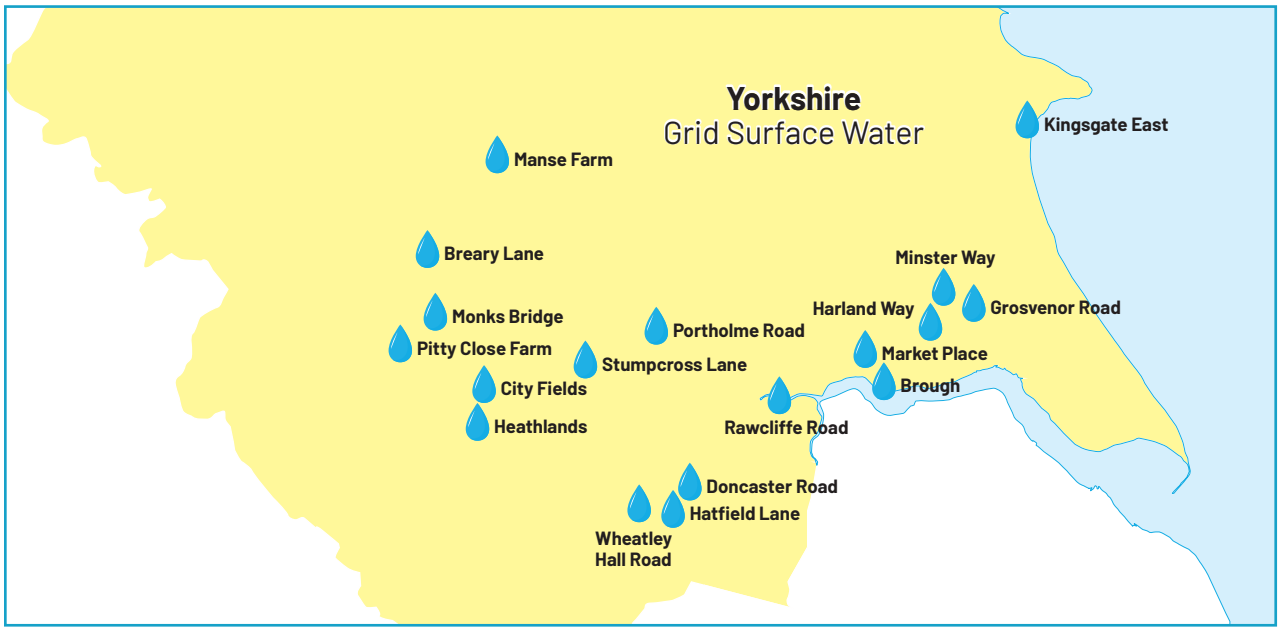

FIGURE 5.16 IWNL'S INSETS IN YORKSHIRE WATER'S WRZ

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

DRAFT DROUGHT PLAN 2021

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.

DRAFT DROUGHT PLAN 2021

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.

DRAFT DROUGHT PLAN 2021

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/

Independent Water Networks

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APPENDIX A: DIFFERENCES BETWEEN WRMP19 AND DROUGHT PLAN 2021

OCTOBER 2021

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List of Figures

A1 IWNL's Drought Zones

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). The table below illustrates our sites which will be grouped in the event of a drought and their respective incumbent water resource zones.

TABLE A1.1 IWNL'S DROUGHT RESOURCE ZONES

INCUMBENT	INCUMBENT WATER RESOURCE ZONE	IWNL WATER RESOURCE ZONE
Affinity Water	Brett	Oakwood Park
		Turpins Farm
	Dour	Archer's Court Road
		Martello Lakes
	Lee	Bidwell West
	Stort	Bishop's Stortford
	Pinn	Nestle's Avenue
Anglian Water	Central Lincolnshire	Greetwell Fields
		Lincolnshire Lakes
		Prebend Lane
	East Suffolk	Factory Lane
		Henley Road
		Thorney Green
	Hartlepool	Naisberry Farm
		Tunstall Farm
		Wynyard Park
	Ixworth	Ashfield Road
	Norwich and the Broads	Colney Lane
		Green Lane East
		Manor Road
		Norwich Road
		Salhouse Road
		Salhouse Road, Sprowston
		Salhouse Road, Rackheath
		St Giles Park
	Nottinghamshire	Foxby Lane
	Ruthamford Central	Brooklands
		Great Billing Way
		Yardley Road
	Ruthamford North	Ashby Road, Daventry
		Eastrea Road
		Long Croft Rd (Little Stanion).
		Oakham North*
		Priors Hall
		Rowtree Park
	Ruthamford South	Church Street, Langford
		Clipstone Park
	South Essex	Cowdary Centre
		Stone Path Drive
		Chilton Wood

INCUMBENT	INCUMBENT WATER RESOURCE ZONE	IWNL WATER RESOURCE ZONE
Bristol Water	WRZ	Parklands
Cambridge Water	Cambridge	Newmarket Road
Essex and Suffolk Water	Essex	Limebrook Way
		Marsh Road
		Maylons Lane
Northumbrian Water	Kielder	Blakeston Lane
		Chester Road
		Edderacres Walk
		Lambton Park
		Percy Drive
		Throckley
Portsmouth Water	Portsmouth	Harbour Place
		Shopwhykes Lakes
		The Spires
		Windmill Views
Seven Trent Water	Forest and Stroud	Phase 4, Southend Lane
	Strategic Grid	Blythe Valley
		Europa Way
		Nightingale Quarter
South East Water	WRZ03	Turners Hill Road
	WRZ04	Watery Lane
	WRZ06	Sportsman's Farm
		Sutton Road
	WRZ08	Chilmington Green
		Cockering Road
Southern Water	Medway Kent	Otterham Quay Lane
	Southampton East, Hampshire	Deer Park
		North Whiteley
		Stoneham Lane
	Sussex North	NES Crawley
South Staff Water	South Staffs	Ashby Road, Tamworth
Thames Water	London	Brent Cross Phase 1a.1
		Ebbsfleet, Castle Hill
		Ebbsfleet, Eastern Quarry
		GMV
		King's Cross Central
		The Bridge
	Slough, Wycombe and Aylesbury	Berryfields

INCUMBENT	INCUMBENT WATER RESOURCE ZONE	IWNL WATER RESOURCE ZONE
Yorkshire Water	Grid Surface	Breary Lane
		Brough
		City Fields
		Church Lane
		Doncaster Road
		Grosvenor Road
		Harland Way
		Hatfield Lane
		Heathlands
		Kingsgate East Phase
		Manse Farm
		Market Place
		Minster Way
		Monks Bridge
		Pitty Close Farm
		Portholme Road
		Rawcliffe Road
		Stumpcross Lane
		Wheatley Hall Road

*IWNL's BSA is with Severn Trent Water, however it is through a bulk supply agreement they have with Anglian Water which is within Anglian Water's Ruthamford North water resource zone.

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APPENDIX B: COMMUNICATION EXAMPLES

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B1 Examples website water efficiency advice

Below are examples of water efficiency advice available on our website.

Environment – Using Water Wisely at Home

With the growing use of modern amenities like dishwashers, washing machines, power showers and swimming pools, it's no wonder the amount of water used in homes has grown tremendously in the past half a century.

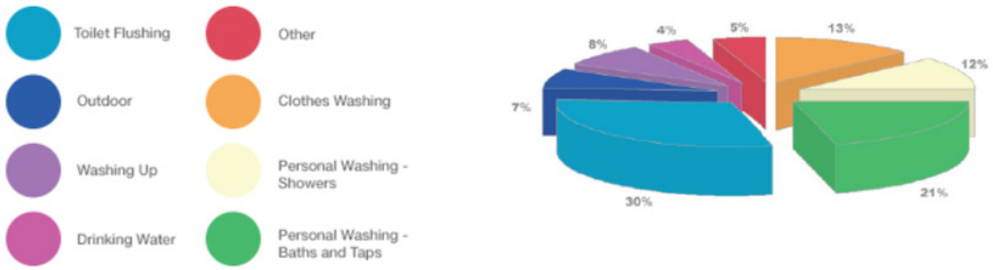
Saving water benefits not only the environment, but your budget as well. Reducing your water use means there's less water that needs to be treated - which means lower sewerage charges in addition to a cheaper water bill!

Saving water is easier than you think - why not try a few of these tips and see for yourself?

How People Use Water

People use water several different ways - surprisingly, the biggest culprit is the toilet, accounting for a third of a household's daily water use!

Water Use In The Home



Kitchen

What you can do:

- Use a bowl instead of a running tap for washing vegetables - you can save about five litres of water each time
- Plug the sink and fill it with water to wash dishes and cutlery - try and wait until you have a sink full, if possible
- Avoid rinsing dishes before loading them into the dishwasher
- Use washing machines only if you have a full load, as one full load generally uses less water than two half loads
- Hand wash woollen items in the sink
- Buy energy-efficient appliances and save money on both your electric and water bills! To download a list of the most water-efficient dishwashers and washing machines on the UK market, visit www.waterwise.org.uk
- Running the tap until the water is cold enough to drink wastes a lot of water - why not collect it and reuse it in your garden?
- Fill your kettle with only the amount of water you need

Bathroom

What you can do:

- Try not to leave the tap running while you brush your teeth, shave or wash your hands, as this can waste up to five litres of water per minute
- Take a shower instead of a bath - unless you have a power shower, which can use more water than a bath! If you're unsure, check with the manufacturer
- Fix dripping taps - they can waste at least 5,500 litres of water a year! Mending your dripping tap washer could save you more than £18.00 a year
- In older, larger capacity toilet cisterns, you can reduce the amount of water you flush by placing a cistern bag or a cut-down plastic bottle in your cistern. The amount the bottle holds will be the amount of water you save with each flush. Don't use these in modern toilets though, as it can create the need for double flushing!

Garden

What you can do:

- Collect rainwater in a water butt (a container that stores water that runs off your roof) and use it to water your garden. These can be found at most garden centres. Remember to always keep it covered, as children or pets could fall in
- Don't use a hosepipe to water your garden. Instead use a watering can, and aim the water at the roots of your plants where it will be most effective
- You can use collected dishwater on your established plants, but not on edible plants, and do make sure the water doesn't have bleach or disinfectants mixed in
- Use mulch around your plants to reduce evaporation and keep weeds down
- Don't water your plants in the direct sunlight - the sun's scorching rays could damage your plants and most of the water will be lost through evaporation anyway. The best time to water your plants is in the early morning or evening
- It's ok to let your lawn go brown during the summer months. Brown lawns are eco-friendly and it will recover immediately after rainfall - even the Queen has a brown lawn in the height of a hot dry summer!

An effective (and visually striking!) way to combat climate change is to have drought-resistant plants in your garden. Below is a list of some of the most tolerant varieties:

Annuals

- Gazania (Treasure Flower)
- Poppy
- Cosmos
- Mexican Sunflower

Bedding And Patio Plants

- Alonsoa (Mask Flower)
- Argyranthemum
- Bidens
- Nicotania
- Zinnia
- Osteospermum
- Senecio

Trees And Shrubs

- Buddleja davidii (Butterfly Bush)
- Box
- Broom
- Elaeagnus
- Holly
- Privet
- Jerusalem Sage
- Rock Rose
- Ruscus (Butcher's Broom)

Climbers

- Ivy
- Russian Vine
- Clematis

Perennials

- Campanula (Bellflower)
- Echinacea
- Flax
- Gaillardia
- Geranium
- Sea Lavender
- Thrift
- Toadflax

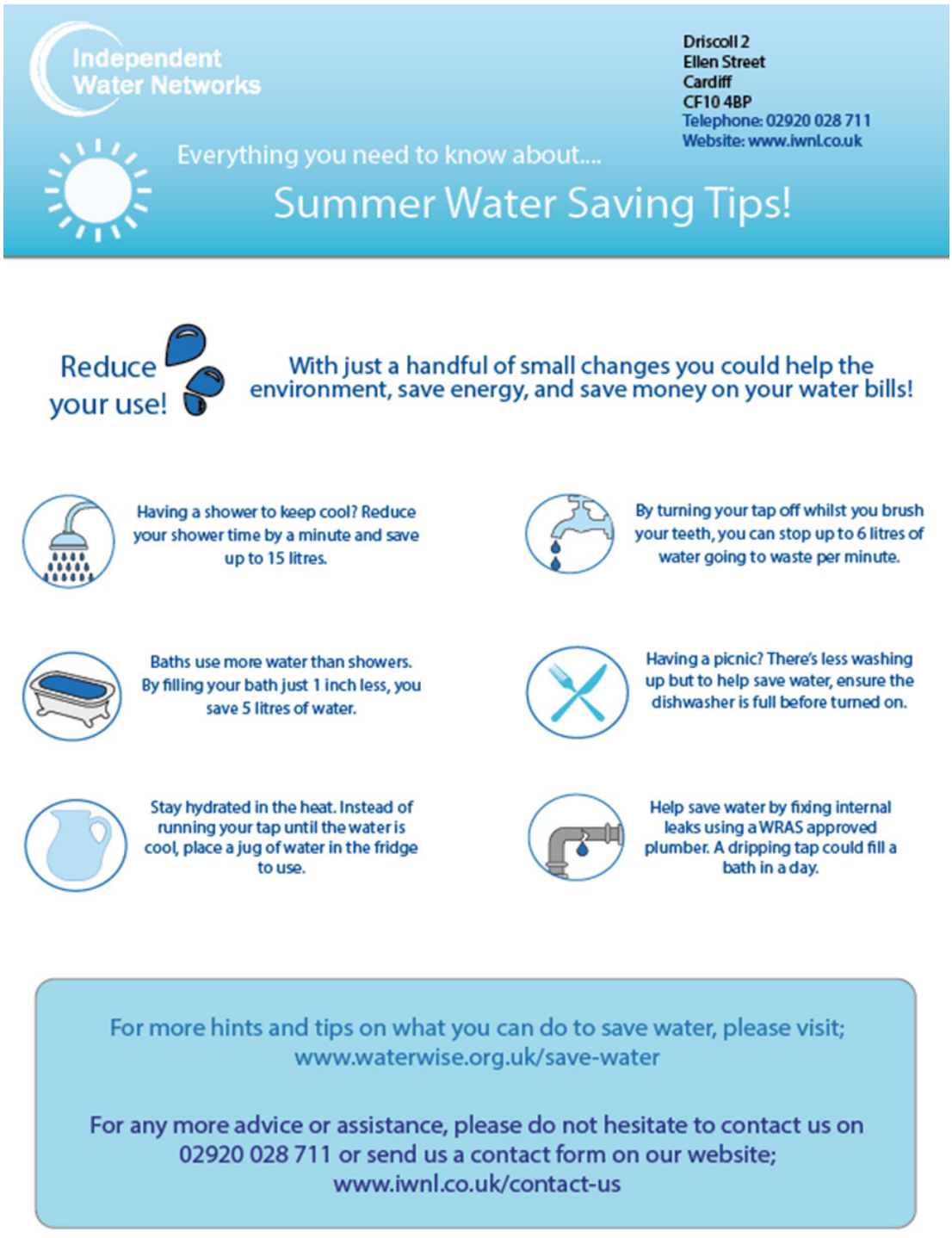
Washing Your Car

What you can do:

- Use a bucket and sponge to wash your car instead of a hosepipe - running a hosepipe for one minute wastes about 30 litres of water
- If you have to use a hosepipe, ensure it's fitted with a trigger nozzle. This will stop the flow of water when it's released, preventing wastage.

B2 Leaflet examples of water efficiency advice

Below are examples of water efficiency advice.



Independent Water Networks

Driscoll 2
Ellen Street
Cardiff
CF10 4BP
Telephone: 02920 028 711
Website: www.iwnl.co.uk

Everything you need to know about....

Summer Water Saving Tips!

Reduce your use!

With just a handful of small changes you could help the environment, save energy, and save money on your water bills!

Recycle the water in your paddling pool. You can use it to wash your car, water your plants or even wash your dog!

Water butts are a great way to collect water for your garden. Rain could fill up your water butt 450 times a year.

Switch from a hose to a bucket and sponge to wash your car. You'll help save water during high demand.

Save water by watering your plants at dawn or dusk, this will reduce the water lost to evaporation.

Hose and sprinklers typically use 1000 litres per hour, that's more than 12 baths! By using a watering can, you'll help save water.

Spread some mulch! A layer of mulch, pebbles or compost in between your garden plants helps keep moisuture in and saves water.

For more hints and tips on what you can do to save water, please visit;
www.waterwise.org.uk/save-water

For any more advice or assistance, please do not hesitate to contact us on 02920 028 711 or send us a contact form on our website;
www.iwnl.co.uk/contact-us

Independent Water Networks

Driscoll 2
Ellen Street
Cardiff
CF10 4BP
Telephone: 02920 028 711
Website: www.iwnl.co.uk

Everything you need to know about....

Winter Water Saving Tips!

Reduce your use!

With just a handful of small changes you could help the environment, save energy, and save money on your water bills!

Fancy a cuppa? Save water and energy by filling you kettle with only the amount of water you need.

Showers use the largest amount of water in homes. By reducing your shower by a minute, you can save up to 15 litres.

Wearing more woolly jumpers? By ensuring your washing machine is full, you'll help save water.

Plants need less water over winter, including house plants. Now is a great time to install a water butt in preparation for spring.

If comfort food is on the menu, ensure your dishwasher is full before putting it on.

Protect your pipes from frost. Cold temperatures can affect exposed pipes and taps.

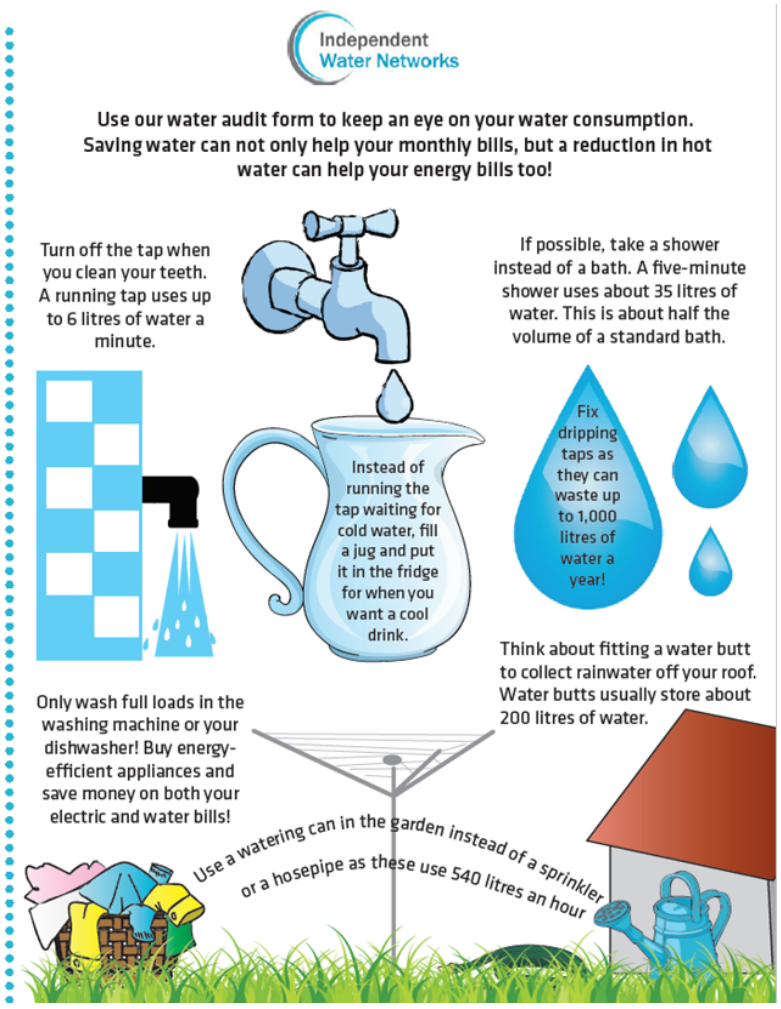
For more hints and tips on what you can do to save water, please visit;
www.waterwise.org.uk/save-water

For any more advice or assistance, please do not hesitate to contact us on 02920 028 711 or send us a contact form on our website;
www.iwnl.co.uk/contact-us

B3 Developing Drought: Water Audit

Activity	Litres used at a time	Multiply by number of times a day	Daily total
Bathroom			
1 bath	80		
5 minute shower	35		
5 minute power shower	80		
1 flush of the toilet	6		
Running tap for 3 minutes to clean teeth/personal washing	18		
Kitchen			
Washing machine per full load	65		
Dishwasher per full load	25		
Running a kitchen tap for 1 minute	6		
Washing up dishes by hand for 5 minutes	30		
Dripping tap per day	3		
Preparing food and cooking for one meal	15		
Garden/Outside Leisure			
Watering can	4		
Hosepipe/sprinkler for 1 hour	540		
Household's total daily water use (litres)			

The average person in England and Wales use around 150 litres of water a day...



B4 Level 2 – Drought: Example wording for the notification of water use restrictions under a Temporary Use Ban

WATER INDUSTRY ACT 1991
INDEPENDENT WATER NETWORKS LTD
TEMPORARY BAN ON WATER USE

Independent Water Networks Ltd (IWNL)gives notice that, pursuant to sections 76 and 76A–C of the Water Industry Act 1991, the following uses of water supplied by IWNL are restricted.

This notice, and further details concerning the prohibitions, current drought and water efficiency advice may be found on IWNL website at www.iwnl.co.uk

Water use restrictions will start on [TIME] on [DATE] and continue until further notification. The restriction applies in the area of supply of [INSET NAME]. Thank you for your support at this important time.

Prohibited Uses

The use of a hosepipe, including using sprinklers, dripper hoses, automatic irrigation systems and similar devices, is prohibited for the following:

1. Watering a garden using a hosepipe
2. Cleaning a private motor-vehicle using a hosepipe
3. Watering plants on domestic or other non-commercial premises using a hosepipe
4. Cleaning a private leisure boat using a hosepipe
5. Filling or maintaining a domestic swimming or paddling pool
6. Drawing water, using a hosepipe, for domestic recreational use
7. Filling or maintaining a domestic pond using a hosepipe
8. Filling or maintaining an ornamental fountain
9. Cleaning walls, or windows, of domestic premises using a hosepipe
10. Cleaning paths or patios using a hosepipe
11. Cleaning other artificial outdoor surfaces using a hosepipe

Note that customers can still undertake the above activities if they use mains water from a bucket or watering can; or use water that is not sourced from the mains such as grey water, rainwater from a water butt through a hosepipe, or private boreholes for example.

The following definitions apply:
"Using a hosepipe" includes the drawing of water supplied by the company from a container through a hosepipe; and filling a container by means of a hosepipe with water supplied by the company;

- "Garden" includes a park, gardens open to the public, a domestic garden, a lawn, a grass verge, an allotment used for non-commercial purposes and any other green space;
- "Hosepipe" includes anything designed, adapted or used to serve the same purpose as a hosepipe. The pro-

hibitions apply whether or not any device is attached to the hosepipe, such as a sprinkler for example; and
- "Using a hosepipe for domestic recreational use" includes operating water slides and other recreational equipment.

These prohibited water uses are covered by the Water Industry Act 1991 section 76 as amended by the Flood and Water Management Act 2010. Further definitions may be found in the Water Use (Temporary Bans) Order 2010, which is available at: http://www.legislation.gov.uk/uksi/2010/2231/contents/made

Statutory Exceptions

Customers who meet the requirements below can continue to use water without having to make representation to IWNL to receive permission. In using water, it is requested that customers use water wisely and adopt water efficient practices:

- Using a hosepipe for health or safety reasons, where this includes (a) removing or minimising any risk to human or animal health or safety; and (b) preventing or controlling the spread of causative agents of disease;
- Watering plants that are (1) grown or kept for sale or commercial use, or (2) that are part of a National
- Plant Collection or temporary garden or flower display;
- Cleaning any area of a private leisure boat which, except for doors or windows, is enclosed by a roof and walls;
- Filling or maintaining a pool where necessary in the course of its construction;
- Filling or maintaining a pool that is designed, constructed or adapted for use in the course of a programme of medical treatment;
- Filling or maintaining a pool that is used for the purpose of decontaminating animals from infections or disease;
- Filling or maintaining a pool used in the course of a programme of veterinary treatment;
- Filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in captivity;
- Filling or maintaining a domestic pond in which fish or other aquatic animals are being reared or kept in captivity; and
- Filling or maintaining an ornamental fountain which is in or near a fish-pond and whose purpose is to supply sufficient oxygen to the water in the pond in order to keep the fish healthy.

n.b. Watering areas of grass, which are used for sport or recreation, is covered by a Statuary Exception for health & safety only in relation to the active strip/playing area, not the entire ground.

Discretionary Universal Exceptions

Customers who meet the criteria below for a Discretionary Universal Exception can continue to use water without having to make representation to IWNL to receive permission to use water for the following restricted uses. It is requested that customers that meet the requirements for a Discretionary Universal Exception use water wisely and adopt water efficient practices.

The criteria for a Discretionary Universal Exception include:

- Watering a garden attached to a domestic dwelling, or watering plants on domestic premises using a hosepipe by people with severe mobility problems who hold a current Blue Badge as issued by their local authority;
- Use of an approved drip or trickle irrigation watering system, fitted with a pressure reducing valve and a timer, that are not handheld, that place water drip by drip directly onto the soil surface or beneath the soil surface, without any surface run off or dispersion of water through the air using a jet or mist; and
- Commercial customers that use hosepipes in the course of their day-to-day business operation for example hand car washing, window cleaning, graffiti removal), excluding the watering of domestic gardens.

Discretionary Concessional Exceptions

Customers can make representation to IWNL to receive a Discretionary Concessional Exception to use water for the following restricted uses. If permission for a Discretionary Concessional Exception is given, it is requested that customers use water wisely and adopt water efficient practices.

The water uses for which a Discretionary Concessional Exception can be applied for by writing to IWNL include:

- Watering a garden attached to a domestic dwelling, or watering plants on domestic premises using a hosepipe by people registered on IWNL's Vulnerable Customer who have mobility issues but who are not in possession of a Blue Badge.

Representations

Representations concerning any of these prohibitions may be made in writing by [DATE] to IWNL Drought Representations Team,
Driscoll 2
Ellen Street
Cardiff
CF10 4BP

If, as a result of any representation, IWNL decides to vary any terms of the prohibition, a further notice will be published. Subject to this, the prohibitions will have effect from the stated date and will remain in force until further notice.

Any person who contravenes any of these prohibitions may be guilty of an offence, and liable, on summary conviction, to a fine not exceeding £1,000.

B5 Level 3 – Drought: Example wording for the notification of water use restrictions under a Drought Order

NOTICE OF APPLICATION FOR DROUGHT ORDER PROHIBITION OR LIMITATION ON THE USE OF WATER

Take notice that due to the threat of a serious deficiency in supplies of water within the affected area, caused by an exceptional shortage of rainfall, Independent Networks Lts (IWNL)] of Driscoll 2, Ellen Street, Cardiff, CF10 4BP is applying to the Secretary of State for Environment, Food and Rural Affairs for a Drought Order under sections 73 and 74(2)(b) of the Water Resources Act 1991.

The affected area includes all of the following areas insofar as they receive a supply of water from the Company: [LIST PLACES HERE].

The Drought Order is necessary to manage the demand for water in order to meet the deficiency of supplies of water in the area. The uses of water that can be prohibited or limited under the Drought Order are those prescribed by the Secretary of State in the Drought Direction 2011. These activities are in addition to the activities covered by Temporary Use Ban that are currently in place for domestic customers.

The proposed Drought Order will allow IWNL to prohibit or limit the use of water within the area referred to for any of the following purposes:

Purpose 1: Watering outdoor plants on commercial premises;
Purpose 2: Filling or maintaining a non-domestic swimming or paddling pool;
Purpose 3: Filling or maintaining a pond;
Purpose 4: Operating a mechanical vehicle-washer;
Purpose 5: Cleaning any vehicle, boat, aircraft or railway rolling stock;
Purpose 6: Cleaning non-domestic premises;
Purpose 7: Cleaning a window of a non-domestic building;
Purpose 8: Cleaning industrial plant; Purpose 9: Suppressing dust; and
Purpose 10: Operating a cistern in any building that is unoccupied and closed.

Statutory Exceptions

Customers who wish to use water for the actions below can continue to use water without having to make representation to IWNL to receive permission. In using water, it is requested that customers use water wisely and adopt water efficient practices.

- Purpose 1 does not include watering plants that are: grown or kept for sale or commercial use; or part of a National Plant Collection or temporary garden or flower display
- Purpose 2 does not include:
  - filling or maintaining a pool that is open to the public;
  - filling or maintaining a pool where necessary in the course of its construction;
  - filling or maintaining a pool using a hand-held container which is filled with water drawn directly from a

tap;
- filling or maintaining a pool that is designed, constructed or adapted for use in the course of a programme of medical treatment;
- filling or maintaining a pool that is used for the purpose of decontaminating animals from infections or disease;
- filling or maintaining a pool that is used in the course of a programme of veterinary treatment;
- filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in
- captivity;
- filling or maintaining a pool that is for use by pupils of a school for school swimming lessons.

- Purpose 2: a pool is not open to the public if it may only be used by paying members of an affiliated club or organisation.
- Purpose 3 does not include: filling or maintaining a pond in which fish or other aquatic animals are being reared or kept in captivity; or filling or maintaining a pond using a hand-held container which is filled with water drawn directly from a tap.
- Purpose 3 does not include filling or maintaining a domestic pond using a hosepipe.
- Purpose 5 permits the cleaning any vehicle, boat, aircraft or railway rolling stock for health or safety reasons
- Purpose 6 permits the cleaning of any exterior part of a non-domestic building or a non-domestic wall for health or safety reasons
- Purpose 7 permits the cleaning a window of a non-domestic building using a hosepipe for health or safety reasons
- Purpose 8 permits the cleaning industrial plant using a hosepipe for health or safety reasons
- Purpose 10 permits the suppression of dust using a hosepipe for health or safety reasons

Discretionary Universal Exceptions

Customers who meet the criteria below for a Discretionary Universal Exception can continue to use water without having to make representation to IWNL to receive permission to use water for the following restricted uses. It is requested that customers that meet the requirements for a Discretionary Universal Exception use water wisely and adopt water efficient practices.

The criteria for a Discretionary Universal Exception include:

- Filling or maintaining a pond using a hosepipe by people with severe mobility problems who hold a current Blue Badge as issued by their local authority

Discretionary Concessional Exceptions

Customers can make representation to IWNL to receive a Discretionary Concessional Exception to use water for the following restricted uses. If permission for a Discretionary Concessional Exception is given, it is requested that customers use water wisely and adopt water efficient practices.
The water uses for which a Discretionary Concessional Exception can be applied for by writing to IWNL include:

- Filling or maintaining a pond using a hosepipe by people registered on IWNL's Vulnerable Customer List who have mobility issues but who are not in possession of a Blue Badge.

View the applications

Anyone may inspect a copy of the application, including a copy of the draft Drought Order and plan showing the affected area, free of charge, at the offices of IWNL, Driscoll 2, Ellen Street, Cardiff, CF10 4BP, between the hours of 08:30-17:00, Monday to Friday, within 7 days of the date of publication of this notice. A copy of the draft Drought Order and plan showing the affected area is also available for inspection at the offices of the under-

mentioned solicitors between the hours of [HOURS], Monday to Friday, within 7 days of the date of publication of this notice.

Objections may be made in writing to the Secretary of State for Environment, Food and Rural Affairs, c/o [NAME OF CONTACT], [DEPARTMENT AND ADDRESS (or by e-mail to [EMAIL ADDRESS]), giving an address to which correspondence relating to the objection may be sent. Objections should be made within 7 days of the date of publication of this notice.

[NAME AND ADDRESS OF SOLICITORS]
Solicitors acting for IWNL

B6 Example wording for the revocation of restrictions

INDEPENDENT WATER NETWORKS LTD (IWNL)
Removal of Restrictions on Water Use

[INSERT RELEVANT REFERENCE TO LEGISLATION ACCORDING TO THE WATER USE RESTRICTIONS THAT HAVE BEEN IN PLACE (TUBs/Ordinary Drought Orders)]

Since [DATE] a number of temporary restrictions on the use of water (with some exceptions) have been in force in the IWNL area.

We are pleased to announce that that from [time and date] all of these restrictions are lifted.

We are very grateful to our customers for their cooperation in conserving supplies during the water shortage. We ask customers to continue to show restraint and to use water responsibly to help secure future supplies.

Any queries in connection with this announcement should be addressed to: Water Resources, Driscoll 2, Ellen Street, Cardiff, CF10 4BP Or by email to: waterresources@iwnl.co.uk

[DATE]

Independent Water Networks

Drought Plan 2021

APPENDIX C: TESTING IWNL'S DROUGHT TRIGGERS

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C1 Incumbent Communications

Our drought triggers are based on incumbent communication. We recently tested our trigger for Level 1 (developing drought) with an incumbent.

The incumbent informed IWNL that their triggers for level 1 were met and that they were increasing communication with customers and preparing TUBs/Ordinary Drought Permit.

Please see below for the information shared by the incumbent and the subsequent actions IWNL took.

Developing Drought	
Information Shared	**IWNL's Actions**
• Rainfall data • River flow data • Forecast of further restrictions • Forecast of return to normal services • Current stage of the permit process • Background on river	• Targeted water efficiency advice to our customers • Monitored the supply meter • Monitored customer's water usage

FIGURE C1.1 TRIGGER LEVEL 1 COMMUNICATION

Communication with the incumbent was increased during the duration of level 1. This event illustrated that our level 1 trigger is effective for commencing dialog with the incumbent and our customers in a developing drought. To strengthen our level 1 trigger, annual liaison meetings will occur with the incumbent to review the upcoming annual forecast for the water resource zones.

Independent Water Networks

Drought Plan 2021

APPENDIX D: LESSONS LEARNT 2020

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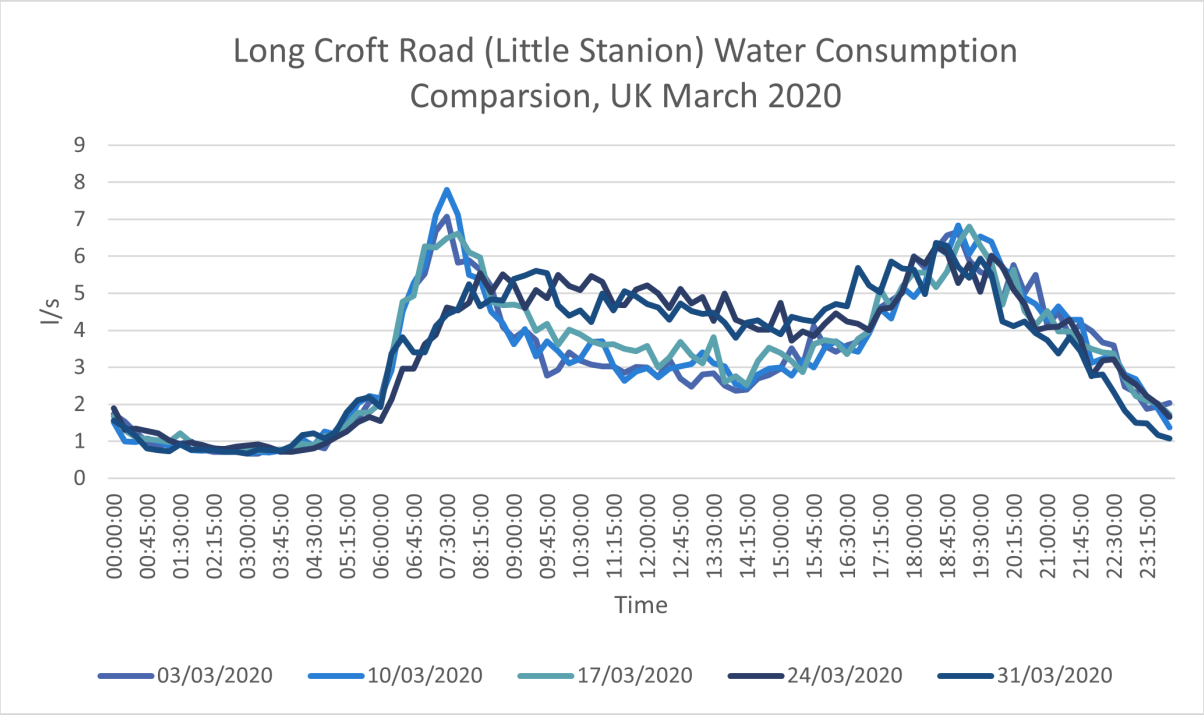
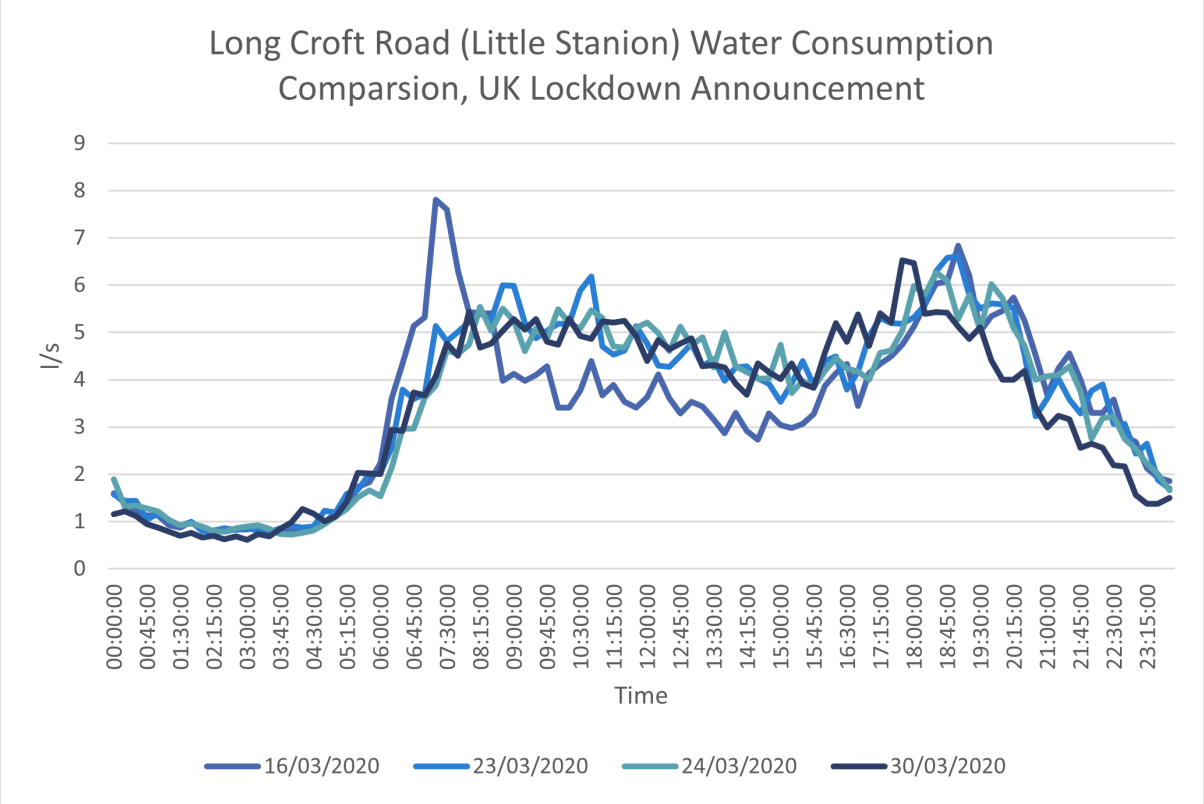
D1 COVID-19

The coronavirus lockdown in 2020 led to changes in water consumption such as water consumption moved from public spaces (gyms, offices) to domestic settings and peak demand shifted (please see graph below).



GRAPH D1.1 LONG CROFT ROAD (LITTLE STANION) WATER CONSUMPTION COMPARISON, UK MARCH 2020

On the evening of the 23rd March 2020, the Prime Minster announced the first lockdown in the UK, ordering people to stay at home. Following this announcement, both the time and length of peak morning demand changed; this change is illustrated in graph D1.1. This graph used water consumption data for each Wednesday in March 2020 from IWNL's inset, Long Croft Road (Little Stanion). The below graph (D1.2) further highlights the change of water demand in IWNL's inset, Long Croft Road (Little Stanion), for the days leading up to and after the nationwide lockdown announcement.



GRAPH D1.2 LONG CROFT ROAD (LITTLE STANION) WATER CONSUMPTION COMPARISON, UK LOCKDOWN ANNOUNCEMENT

UK lockdown changed behaviours and routines, which led to an increase of water consumption; this can be viewed in IWNL's insets. Table D1.1 shows IWNL's average water consumption for 2019 and 2020. There was an 8.84% increase in water usage for 2020 when compared to the previous year.

TABLE D1.1 AVERAGE DAILY USE COMPARISON FOR 2019 AND 2020

YEAR	AVERAGE PROPERTY DAILY USAGE FROM METER READS, M^3/D [i]
2019	0.286
2020	0.312

[i] Daily usage data excluded any meters where the usage shown for the period was negative, zero, or if there was no data for 2019.