



Drought Plan 2026

INDEPENDENT WATER NETWORKS LTD.

March 2026



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Statement of Assurance

IWNL's Drought Plan 2026 reflects and considers the relevant regional plans, national framework and relevant guidance and policy. The Board has engaged and overseen the development of Drought Plan 2026 which continues to meet our obligations to supply water and protect the environment.

Authorised:	31st March 2026 Charlie Thackeray, IWNL Director
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Executive Summary

This Drought Plan explains how Independent Water Networks Ltd (IWNL) will support its customers during periods of dry weather and drought. IWNL does not operate its own water sources; instead, all water supplied to IWNL homes and businesses is provided by the local incumbent water company through bulk supply agreements.

As a NAV water company, IWNL follows the same drought stages used across Wales and works closely with each incumbent supplier to make sure customers receive clear and consistent information. When drought conditions worsen, IWNL may introduce temporary restrictions such as hosepipe bans to help reduce demand. More serious measures, such as drought orders and emergency drought restrictions may be applied for by IWNL as well as by the incumbent water company, depending on the area and the drought conditions. Some of these measures would need authorisation from Government bodies or Natural Resources Wales. IWNL will communicate any such measures clearly to affected customers.

IWNL's focus during drought is to help customers use water wisely and to keep them well informed at every stage. Additional support is available for customers on the Priority Services Register or those who may need extra assistance.

When drought conditions improve, IWNL will lift restrictions in line with improving water availability and will continue to encourage long term water efficiency. After each drought, IWNL reviews what worked well and what can be improved to strengthen future plans.

This plan ensures IWNL is prepared, coordinated and ready to support customers through all stages of a drought.



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Section One: Introduction





1.0 Introduction

This Drought Plan outlines the approach Independent Water Networks (IWNL) will take during periods of drought, including how we will manage customer supplies to maintain the levels of service set out in our Water Resources Management Plan 2024. The plan provides a clear framework for operational coordination, customer engagement, and governance throughout drought conditions.

1.1 Independent Water Networks

Independent Water Networks (IWNL) is part of the BUUK Infrastructure group. The Group specialises in the acquisition, construction, ownership, operation, and maintenance of multi-utility networks serving new developments throughout the UK. Its activities include regulated ownership of utility network assets and the provision of unregulated infrastructure and asset management services. The Group's portfolio includes gas, electricity, water, wastewater, district heating and fibre networks across England, Scotland, and Wales.

IWNL does not own or operate any water sources. All potable water supplied to IWNL's NAV sites is provided via bulk supply agreements with the incumbent water company within whose area each NAV sits. IWNL currently operates 4 NAV appointments across Wales, illustrated in their respective incumbent Water Resource Zones (WRZ) in Section 5.

1.2 Legislative Background

A drought is characterised by a sustained period of abnormally low rainfall. Because drought develops gradually over several months, water companies are expected to plan and implement measures to minimise the impacts of water scarcity.

Section 39B of the Water Industry Act 1991 requires every water undertaker to prepare and maintain a drought plan that demonstrates how the undertaker will continue to supply wholesome water during drought while minimising the need for drought orders or permits.

This Drought Plan has been prepared in accordance with the Drought Plan Regulations 2005, the Drought Plan Direction 2020, Guiding Principles for Developing Water Undertaker Drought Plans for 2025 and Natural Resources Wales (NRW) Water Company Drought Plan Technical Guideline (December 2017). These documents establish the required steps for drought planning, summarised in Table 1.1 below.



1.3 Drought Plan Security Statement

This plan does not contain any information considered sensitive under DEFRA's Advice Note 11 (Edition 5), 'The Control of Sensitive Water Company Security Information' (2016), or the 'Guidance to Water Companies on the Release of Security Sensitive Information' (2012). Accordingly, no redactions have been applied.

Step no.	Stage
1	Preliminary discussions
2	Preparation of draft plan
3	National security and commercial confidentiality process
4	Publish draft plan
5	Submit to Welsh Government for approval to publish for consultation
6	Public consultation on draft plan
7	Review consultation responses and publish statement of response
8	Amendments to plan
9	Submit to Welsh Government for approval
10	Publish final plan following Welsh Government approval

TABLE 1.1 STATUTORY PROCESS FOR THE DEVELOPMENT OF A DROUGHT PLAN



1.4 Consultation Process

PRE-CONSULTATION

IWNL undertook pre consultation with NRW and all relevant incumbent water companies prior to drafting this plan. Feedback from these organisations helped shape the content and structure of the draft Drought Plan 2026.

PUBLIC CONSULTATION

The draft plan was published for an eight week public consultation, during which IWNL invited responses from customers, statutory bodies, regulators, and other stakeholders. IWNL consulted a full range of bodies including NRW, Ofwat, Welsh Government, Public Health Wales, DWI, CC Water, local authorities, and relevant incumbent water companies. A Statement of Response summarising the feedback received and resulting amendments will be subsequently published.

- All IWNL's customers (Approx 1092 customers),
- Natural Resources Wales,
- The Drinking Water Inspectorate (DWI),
- The Water Services Regulation Authority (OFWAT),
- The Consumer Council for Water (CC Water),
- Canal and River Trust,
- Dŵr Cymru Welsh Water,
- Hafren Dyfrdwy,
- Relevant Councils in IWNL's supply areas

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Section Two:

Management & Drought Action Strategy



2.0 Management & Drought Action Strategy

IWNL is committed to keeping customers and stakeholders fully informed as water resources decline and the risk of restrictions grows. This Drought Plan serves as a key communication tool, outlining the specific service levels and support our customers can expect whenever drought conditions arise.

Customers and other stakeholders have the opportunity to comment on and influence the Drought Plan every five years. To support this, our approach is to publish the plan on our website for information and review its content annually, with full consultation and updates undertaken on a five year cycle. As IWNL continues to grow, additional NAV licenses will be acquired following publication of this plan. As new licenses are obtained, IWNL will assess any associated zonal impacts as part of the annual Drought Plan review. Updated versions of the plan will continue to be made available on our website.

Table 2.1 sets out the drought classification levels and the associated actions. These levels and actions are defined by NRW and are used consistently across water companies in Wales. As IWNL does not own or operate any water sources, our levels of service relate solely to demand side measures rather than 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 managed under IWNL's Emergency Plan.	4

Since IWNL mirrors the actions of the incumbent supplier, our operational triggers are outlined below. The implementation of any drought measures is undertaken in coordination with the relevant incumbent water companies. As each incumbent operates multiple regions, each with its own specific triggers and intervention measures, these are not individually listed within this plan.

IWNL's levels of service therefore reflect those of the incumbent water company for each supply area. The frequency with which these measures are expected to be implemented is shown by region in Section 5.1.

TABLE 2.2 IWNL DROUGHT TRIGGERS

IWNL'S LEVEL OF SERVICE	TRIGGER	EVENT CONTROLLER	POSSIBLE DROUGHT MEASURES
1	Communication with Welsh government 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 Group Chief CEO Exec	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 engagement with the incumbent water company to ensure we are satisfied with the actions being taken and to support clear, timely and accurate communication with our customers. If IWNL needs to implement drought measures, we will consider:

- [Welsh Government and NRW guidance.](#)
- [The UKWIR Code of Practice includes adherence to the 2nd principle of proportionality.](#)
- [The requirement for a consistent approach with the incumbent water company.](#)

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

2.1 IWNL Drought Stages

Table 2.3 outlines the drought actions IWNL would undertake when the triggers in Table 2.2 are reached, along with the order in which these measures would be implemented. It also details members of the Drought Management Team which would be convened when IWNL deem that the “Developing Drought” scenario (IWNL Level of Service 1) was in place. The Drought Management Team is also shown in Figure 2.1.

TABLE 2.3 IWNL DROUGHT STAGES AND ACTIONS

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



DROUGHT CLASSIFICATION LEVEL	IWNL'S LEVEL OF SERVICE	DROUGHT EVENT CONTROLLER	DROUGHT MANAGEMENT TEAM	SUMMARY OF ACTIONS
Level 2 (Drought)	2	IWNL Board Level director <ul style="list-style-type: none"> IWNL Water Networks Director 	As above plus <ul style="list-style-type: none"> IWNL Water Networks Director BUUK Managing Director of Markets BUUK Regulations Director 	<ul style="list-style-type: none"> Continuation of preceding actions (including greater liaison with incumbent water resources teams) Implementation of Temporary Use Ban (TUBs) Apply for drought orders for Non-Essential Use Ban (NEUB) Briefing of Environment Agency, Consumer Council for Water, DEFRA and other stakeholders Full media campaign with direct appeals for TUBs compliance. Assessment of per capita consumption in areas where a TUB is in place through use of data loggers and enhanced meter reads. Planning to ensure supply security for vulnerable customers Pre-planning for emergency drought order application
Level 3 (Drought)	3	BUUK Board Level director <ul style="list-style-type: none"> BUUK Managing Director of Markets 	As above plus IWNL Board: <ul style="list-style-type: none"> BUUK CEO BUUK Chief Financial Officer 	<ul style="list-style-type: none"> Continuation of preceding actions (including enhanced liaison with incumbent water resources teams) Implementation of Non-Essential Use Ban Implementation of Extreme Drought Management Actions Full media campaign to reflect the ongoing severity of the situation Increased frequency of briefing of Environment Agency, Consumer Council for Water, DEFRA, and other stakeholders Focus water-saving audits in areas where NEUB is in place Apply for emergency drought order 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	<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> Follow guidance set out in IWNL's emergency plans regarding drought events
N/A	Return to Normal Service	IWNL Senior Manager This may be: <ul style="list-style-type: none"> IWNL Head of Regulations and Compliance IWNL Head of Asset Operations IWNL Head of Asset Delivery 	IWNL <ul style="list-style-type: none"> Water Networks Director IWNL Head of Regulations and Compliance IWNL Head of Asset Operations IWNL Head Asset Delivery Water Compliance Scientist Network Performance Analyst BUUK <ul style="list-style-type: none"> Customer Services Manager Marketing Manager 	<ul style="list-style-type: none"> Media campaign that restrictions are lifted Review the effectiveness of actions taken during the drought Publish review of drought measures following the event Resume normal programme of: <ul style="list-style-type: none"> Liaison with incumbent's wholesale/NAV manager Leakage detection and repair Water efficiency work

SEVERITY OF THE DROUGHT ▶▶▶



FIGURE 2.1 IWNL DROUGHT MANAGEMENT TEAM STRUCTURE AT EACH DROUGHT LEVEL

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Section Three:

Drought Measures



3.2 Water Efficiency Media Campaign

Before implementing any further drought management actions, IWNL would initiate a water efficiency campaign. This would commence once the incumbent supplier notifies IWNL that they have entered the “developing drought” scenario (equivalent to IWNL’s Level of Service 1). Water efficiency messaging would continue throughout the duration of the drought. Further detail is provided in Section 4.2.

It is anticipated that the campaign would be launched within one month of notification, although the exact start date would depend on the incumbent’s planned release schedule. The campaign materials would be updated as conditions evolve, incorporating new information and data as they become available.

In the absence of historic performance data, IWNL assumes that this activity will achieve an approximate 1% reduction in average household demand, based on estimates provided by an incumbent supplier. The effectiveness of the campaign will be monitored in line with the approach described in Section 4.4. As IWNL supplies 100% metered properties, demand savings can be assessed prior to the implementation of any Temporary Use Bans (TUBs). Insights gained from monitoring customer engagement will be used to inform future drought planning.

3.3 Temporary Use Bans (TUBs)

The Flood and Water Management Act (2010) granted water companies additional powers to introduce a wider range of temporary water use restrictions during drought conditions without requiring a drought order. These powers are supported by the Water Use (Temporary Bans) Order 2010 and the Drought Direction 2011, which specify the categories of water use that may be restricted with and without a drought order.

The Flood and Water Management Act (2010) granted water companies additional powers to introduce a wider range of temporary water use restrictions during drought conditions without requiring a drought order. These powers are supported by the Water Use (Temporary Bans) Order 2010 and the Drought Direction 2011, which specify the categories of water use that may be restricted with and without a drought order.

IWNL’s preparatory work for implementing a Temporary Use Ban (TUB) would begin during the media campaign described in Section 3.2. Planning activities would commence at this stage, and IWNL would align its consultation timetable with that of the incumbent supplier to ensure consistency in messaging.

TUBs would only be implemented following confirmation from the incumbent supplier that they are initiating their own TUBs. This approach ensures clear and consistent communication, reducing the risk of customer confusion.

Expected demand savings resulting from TUB restrictions are based on analysis of data from the 2003 drought (UKWIR, 2007), alongside estimated savings presented in the industry Code of Practice and Guidance on Water Use Restrictions (2013). IWNL estimates that the implementation of TUBs could reduce peak summer household demand by up to 9.5%. The effectiveness of TUBs will be monitored as outlined in Section 4.4, and findings will be used to inform future drought planning.

CONSULTATION ON TUBS

IWNL will comply with the legislative requirements set out in Section 76B(2) and (3) of the Water Industry Act 1991, as amended by Section 36 of the Flood and Water Management Act 2010, regarding the public consultation process for implementing Temporary Use Bans (TUBs).

Communication relating to this consultation will follow the approach outlined in Section 4.3 and will make use of the example notifications for water use restrictions provided in Appendix A of the UKWIR (2013) Code of Practice and Guidance. Ongoing customer communications will be used to inform households when restrictions formally come into effect.

IWNL intends to allow a 14 day consultation period during which customers may submit representations, including requests for Discretionary Concessional Exceptions. This timeframe may be adjusted to align with the incumbent water company’s consultation schedule.

ACTIVITIES INCLUDED IN TUBS

The activities that will be restricted are listed 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.
-



3.4 Ordinary Drought Orders and Extreme Drought Management Actions

The decision to apply for an ordinary drought order and to initiate extreme drought management actions will be taken at Board level and will be triggered by the incumbent water company submitting its own application. Prior to doing so, IWNL will ensure that all relevant demand reduction measures set out in this drought plan have been implemented. IWNL will also notify Welsh Government, the relevant navigation authorities and NRW. In addition, notices will be issued to local authorities covering the affected areas and to any organisations with statutory protections, where applicable.

IWNL will mirror the incumbent water company in the delivery of drought and extreme drought management actions. Further details on how this communication will be managed are provided in Section 4.1.

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

To further restrict water use, IWNL may need to implement Non-Essential Use Bans (NEUBs) under the Drought Direction 2011. Preparatory work for introducing a NEUB would begin during the media campaign described in Section 4.2.

IWNL anticipates that implementation of a NEUB could take up to three months. This timeframe allows for the full drought-order application and determination process, including the publication of statutory notices in the press. To ensure sufficient lead-in time before restrictions are required, IWNL would commence the application process at the same time that TUBs are implemented (see Section 3.3). IWNL will mirror the incumbent water supplier in the implementation of NEUBs under the Drought Direction 2011 to ensure consistent messaging and customer understanding.

Demand savings associated with imposing NEUB restrictions have been assessed using the UKWIR/ NRW methodology outlined in the 2002 report *Evaluating the Impact of Demand Restrictions*. IWNL estimates that NEUB measures could reduce non-household demand by up to 2%. The

effectiveness of NEUBs will be monitored as described in Section 4.4, and the resulting data will be used to inform future drought plans.

EXTREME DROUGHT MANAGEMENT ACTIONS

Extreme drought management actions are intended for use before Level 4 Emergency Drought Orders. They would be implemented following Level 3 measures (NEUBs) in order to help prevent the need for Level 4 actions, such as rota cuts. These actions are practical to deploy during an extreme drought and are expected to be temporary in nature.

Given the variable nature of drought events, the sequencing and prioritisation of extreme drought management actions will be reviewed on a case by case basis to identify the most appropriate measures for the specific WRZ. This review will be undertaken by the individuals and teams listed in Table 2.3 for Level 3 actions. A summary of the extreme drought actions is provided 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 the incumbent water supplier's extreme drought management actions wherever possible, including aligning the release of shared customer communications. Prior to implementing any measures, IWNL will assess the demand savings achieved through earlier actions.

Preparatory work for implementing these extreme drought actions would begin during the TUBs implementation stage described in Section 3.3.

In the absence of historic performance data, IWNL currently assumes that extreme drought

management actions may achieve a reduction in demand of approximately 20-50%. The effectiveness of these measures will be monitored as outlined in Section 4.4, and the resulting data will inform future drought planning.

Detailed specifications for these actions are still under development. IWNL will continue to refine them through further drought scenario analysis and ongoing discussions with incumbent water companies regarding their own drought actions.



3.5 Emergency Drought Plan

The decision to activate IWNL's emergency drought plan will be taken at Board level and will be triggered by the incumbent water company entering Level 4 drought actions. Before doing so, IWNL will ensure that all relevant demand reduction measures set out in this drought plan have already been implemented. Where required, IWNL will notify the appropriate regulatory and statutory bodies of any emergency drought actions.

Preparatory work for implementing Level 4 emergency actions would begin during the TUBs implementation phase described in Section 3.3.

IWNL will mirror the incumbent water supplier's emergency drought actions wherever possible. As these measures are introduced, the volume of water imported into IWNL's sites will decrease as a result of the self imposed restrictions. In the absence of historic performance data, IWNL currently assumes that Level 4 emergency actions may reduce demand by approximately 20–50%. The effectiveness of these measures will be monitored in accordance with the approach set out in Section 4.4, and the findings will inform future drought planning.

3.6 Return to Normal Services

The decision to return to normal levels of service will be triggered once the incumbent water company confirms that water resources have recovered and that their thresholds for resuming normal operations have been met. Details on how this will be communicated to IWNL customers are provided in Section 4.3.

3.7 Compensation

Compensation payments made to customers for interruptions to their water supply are set out in the IWNL Customer Code of Practice, which is available on our website at: <https://www.iwnl.co.uk/help-and-advice/our-guaranteed-standards-scheme/>

3.8 Post Drought Review

After any drought plan measures are implemented, IWNL will carry out an ongoing assessment of their effectiveness (see Section 4.4). A meeting—or a series of meetings—will be held with the event team to evaluate which actions worked well and identify areas for improvement.

IWNL will prepare a "lessons learned" report within six months of drought measures being lifted. This report will be published on our website and will provide an opportunity for all those involved to reflect on the event, capture key insights, and recommend potential improvements to future iterations of the drought plan.



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Section Four: Communication Strategy





4.0 Communication Strategy

4.1 Communication with Incumbent Water Companies

All bulk supply agreements that IWNL holds for its supply areas include provisions requiring the incumbent water company to “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 attends regional water resource forums and holds regular liaison meetings with the Wholesale/NAV Manager at each incumbent water company. Water resources is a standing agenda item at these meetings and represents the first stage of communication regarding any drought measures that may need to be implemented in the coming months.

When IWNL is informed that the incumbent water company plans to launch a media campaign, IWNL will begin direct engagement with the incumbent water resources and drought management teams to ensure a consistent approach between both organisations. IWNL aims to consult at the same time as the incumbent on any applications for ordinary or emergency drought orders. IWNL will also request access to relevant data being collated by the incumbent to support these applications so that it can be incorporated into IWNL’s own submissions.

Likewise, IWNL will identify “Return to Normal” conditions through communication with incumbent suppliers, who will confirm when their measures indicate that drought restrictions can be lifted. Following a drought event, IWNL will share lessons learned with the incumbent water company and then resume the normal programme of liaison meetings.

4.2 Communication with Customers

During normal service, IWNL engages with customers on water use and water efficiency, helping to build awareness of water resource availability well before any drought conditions develop.

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, IWNL will increase communication with customers in the affected region(s), moving from general messages to more targeted and situation-specific advice. The core message will focus on encouraging customers to use water wisely and reduce consumption. All communications will be supported by clear explanations of the current water resource conditions and how the drought may intensify if dry weather continues. Table 4.1 illustrates how our customer communications will evolve as drought conditions progress.



TABLE 4.1 IWNL'S CUSTOMER COMMUNICATION SUMMARY

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



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

IWNL will follow BUUK Infrastructure’s Incident Communication Policy, which sets out the roles and responsibilities for managing events such as droughts, including the escalation process to designated directors. IWNL will primarily use the company website, www.iwnl.co.uk, to communicate updates and information to customers. In addition to website updates, IWNL will also use email, text messaging, and mail drops to ensure customers are aware of the part they can play in conserving water, as well as the actions IWNL is taking to help manage the drought. As the four IWNL sites are distributed across Wales rather than concentrated within a single region, our communication strategy reflects this and avoids the use of broad regional broadcast messaging. However, IWNL will continue to work closely with incumbent water companies to ensure effective and consistent communication.

IWNL primarily supplies water to domestic households. Our non-domestic customers are mainly small businesses, particularly within the retail and hospitality sectors. Non-Essential Use Bans can have a significant impact on these businesses and organisations within our inset areas; therefore, communications with non-domestic customers will be prioritised during drought Levels 3 and 4, when such restrictions are more likely to be introduced.

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

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 includes an identifier for the specific NAV area in which each customer resides. This allows IWNL to issue targeted emails, text messages and letters to defined geographic areas in response to regional events or incidents. The same functionality would be used to communicate with customers during a drought, ensuring messages are accurate, geographically specific, and relevant to the conditions in their area.

Additionally, any messages published on the website will clearly state which postcode areas are affected by the drought measures.



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

If IWNL needs to introduce a Temporary Use Ban, apply for a Non-Essential Use Ban or implement 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 will 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 across all properties and will use meter data to track changes in per capita consumption during a drought, enabling us to assess how effective our communication strategy has been.

IWNL's network analysis team will investigate areas where consumption is highest, and customers in those areas 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:

- NRW
- Public Health Wales
- Drinking Water Inspectorate
- Consumer Council for Water
- Water UK
- Ofwat
- Local Authorities
- Constituency MPs
- Local Fire Authorities

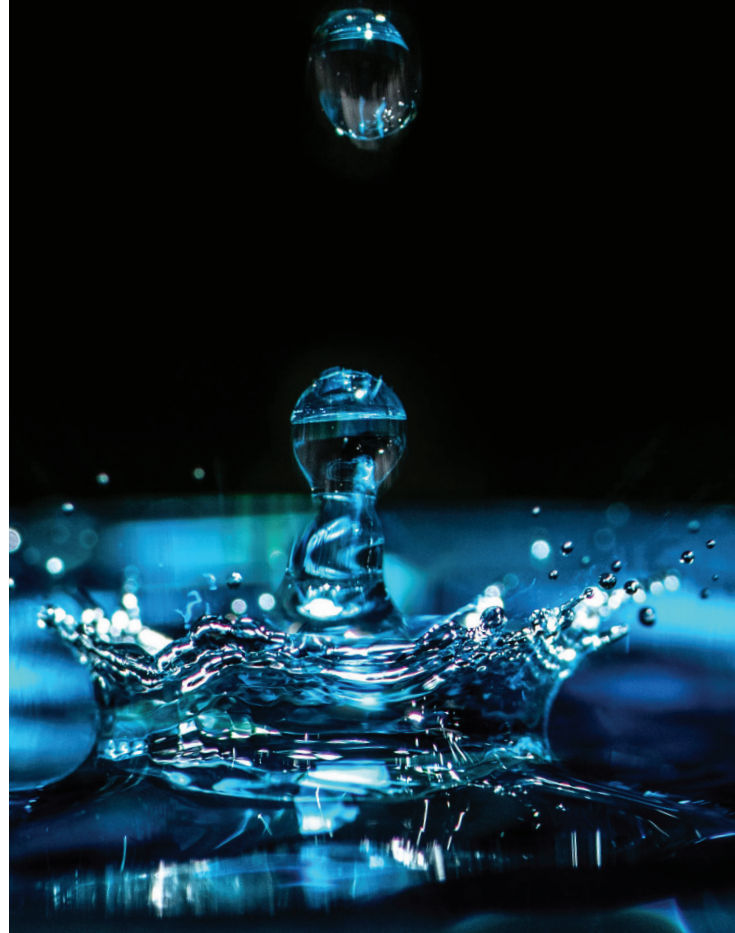
We will communicate with these stakeholders in conjunction with the incumbent.

LOCAL FIRE AUTHORITIES

In the event that emergency drought orders are authorised and implemented, IWNL will notify the local Fire Authority as far in advance as possible. IWNL will take all reasonable measures to ensure that adequate water supplies remain available for Fire Authority operations and will maintain close communication with them throughout the drought event.



Department
for Environment
Food & Rural Affairs



DRAFT DROUGHT PLAN 2026

Section Five:

Water Supply and Demand



5.0 Water Supply and Demand

IWNL serves four sites located across Wales. The supply to these areas is managed through bulk supply agreements with Dŵr Cymru Welsh Water and Hafren Dyfrdwy. These agreements guarantee the volume of water supplied except in the event of force majeure. However, most incumbent suppliers have indicated that they would not reduce bulk supplies below 1 MI/d. As all IWNL bulk supply agreements are for volumes below this threshold, IWNL does not anticipate any reduction in supply under normal drought circumstances.

As IWNL does not operate any of its own water sources, all supply-side management remains wholly under the control of the incumbent water company. IWNL will align with the incumbent when applying for drought orders or emergency drought orders, while relying on effective customer communications and demand-side measures such as water efficiency initiatives to help manage the situation should a drought develop.

5.1 IWNL Levels of Service by Incumbent Supply Region

Within each bulk supply agreement operated by IWNL, there is a clause requiring IWNL to implement the same restrictions on water use as those applied by the incumbent supplying company. This ensures that IWNL customers are subject to consistent regional drought and usage restrictions, aligned with the operational and regulatory measures imposed by the incumbent wholesaler.

IWNL and the respective incumbent water companies have consulted on the Levels of Service applicable within each of our inset areas. Each incumbent is listed below, together with the corresponding drought classification levels and the service levels that IWNL customers can expect in each region.



Dŵr Cymru Welsh Water

IWNL have two bulk supply agreements with Dŵr Cymru Welsh Water, these agreements cover two Dŵr Cymru Welsh Water Resource Zone as shown in Table 5.1.

Incumbent Supplier	IWNL's Site	Incumbent Water Resource Zone
Dŵr Cymru Welsh Water	Cardiff Quay	SEWCUS
	Northern Gateway (Parcel 4)	Clwyd

TABLE 5.1: IWNL'S WATER RESOURCE ZONES SHOWN IN DŴR CYMRU WELSH WATER REGION

IWNL's bulk supply agreements with Dŵr Cymru Welsh Water require us to mirror the incumbent's drought response measures to support water conservation during periods of drought. Dŵr Cymru Welsh Water Levels of Service (LoS), including the frequency and type of restrictions customers may experience are detailed in their full Drought Management Plan, available at: <https://www.dwrcymru.com/en/our-services/water/water-resources/final-drought-plan-2025>

IWNL's level of service in the Dŵr Cymru Welsh Water area is shown in Table 5.2 below.

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	-
2	1 in 20 years (Temporary Use Bans restrictions)
3	1 in 40 years (Demand side ordinary drought orders for non- Essential Use Bans)
4	1 in 200 years (Emergency Drought Order - Standpipes/rota cuts)

TABLE 5.2: IWNL'S LEVELS OF SERVICE FOR DŴR CYMRU WELSH WATER REGION



Hafren Dyfrdwy

IWNL have two bulk supply agreements with Hafren Dyfrdwy, these agreements cover two Hafren Dyfrdwy Water Resource Zone as shown in Table 5.3.

Incumbent Supplier	IWNL's Site	Incumbent Water Resource Zone
Hafren Dyfrdwy	Gatewen Road	WRZ
	Halt Vale	Kinsal

TABLE 5.3: IWNL'S WATER RESOURCE ZONES SHOWN IN HAFREN DYFRDWY REGION

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

IWNL's level of service in the Hafren Dyfrdwy area is shown in Table 5.4 below.

DROUGHT CLASSIFICATION LEVEL	FREQUENCY OF IMPLEMENTATION (DROUGHT SEVERITY)
1	N/A
2	1 in 40-year event (Temporary Use Bans)
3	1 in 40-year event (Non-Essential Use Bans)
4	1 in 500-year event (Emergency Drought Orders)

TABLE 5.4: IWNL'S LEVELS OF SERVICE FOR HAFREN DYFRDWY REGION



DRAFT DROUGHT PLAN 2026

Section Six: Demand Management



6.0 Demand Management

As IWNL cannot implement any supply-side management measures, we must rely solely on demand-side management during any restrictions of use, while working closely with incumbent water companies to minimise the duration of those restrictions.

The areas served by IWNL benefit from newly installed infrastructure, resulting in leakage levels that are significantly lower than those of many 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. As most of the unaccounted-for water is attributed to leakage, the terms leakage and unaccounted-for water are considered 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. Central to this is encouraging and supporting customer behavioural change. IWNL is committed to assisting customers in adopting more efficient water-use habits, and this will be a key focus of our work during drought periods, alongside promoting our wider environmental policy objectives. All new buildings within IWNL's areas will continue to be designed with water efficiency in mind.

All IWNL properties are fully metered. Consumption data from meter readings is routinely monitored to identify potential leakage or to issue advisory letters to customers who are using unusually high volumes of water, along with guidance on how to use water more efficiently.



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Section Seven: Environmental Impacts





7.0 Environmental Impacts

IWNL does not operate any of its own water resources, and as a result, our environmental impact is significantly smaller than that of incumbent water companies.

For each area served, an environmental impact assessment is completed before a licence is granted by OFWAT to ensure that the water IWNL supplies does not have a detrimental effect on the environment.

The Group has an environmental policy, approved by the Board, which sets out how we manage and minimise our environmental impacts.

While IWNL will work closely with the incumbent water company where appropriate, it does not operate any abstraction sources. As a result, it is not considered necessary to include specific environmental mitigation measures within this Drought Plan.



DRAFT DROUGHT PLAN 2026

Section Eight:

List of Appendices



8.0 List of Appendices

Below is a list of Appendices which support IWNL's Draft Drought Plan 2026:

- Appendix A: Communication Examples
- Appendix B: Incumbent Communication
- Appendix C: Lessons Learnt

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



Drought Plan 2026

APPENDIX A: COMMUNICATION EXAMPLES



A1 Examples of website water efficiency advice

Below are examples of water efficiency advice available on the IWNL website.

Water Saving Tips



Reduce your use – Water saving tips in the summer

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

Did you know – Using a hosepipe to wash your car can use 170 litres in 10 minutes, which is just over two baths worth of water.

Know your usage – A cubic metre of water is 1,000 litres. This is equivalent to 13 baths, 14 loads of washing, 28 showers or 111 toilet flushes.

The average person in the UK uses 142 litres of water every day. <http://www.ccwater.org.uk>

You can keep track of how much water you use each day to see how you compare, by filling out our Water Audit Checklist which can be found [here](#).

What can you do in the kitchen?

- Save 10 litres of water by waiting to use your washing machine until you have one full load, and not two half loads.
- Try washing your fruit and vegetables in a bowl of water rather than under a running tap – this can save up to 15 litres every minute.
- Fill up your dishwasher before putting it on. Dishwashers use around 15 litres of water with every wash.
- If you do run the tap waiting for the water to cool down, why not collect it and reuse it in your garden?





What can you do in the bathroom?

- By turning your tap off whilst you brush your teeth, you can stop up to 15 litres of water going to waste per minute.
- Reduce your shower time by a minute and save up to 15 litres. Baths use more water than showers.
- By filling your bath just 1 inch less, you save 5 litres of water.
- Check your toilets for leaks. Add food dye in your cistern and leave it overnight. If in the morning, the bowl is coloured, this indicates you have a leak. Internal leaks should be fixed by an approved plumber – find one at <https://www.watersafe.org.uk/>

What can you do in the garden?

- Water butts are a great way to collect water for your garden. Rain could fill up your water butt 450 times a year.
- Save water by watering your plants at dawn or dusk, this will reduce the water lost to evaporation.
- Use a watering can. A hose or sprinkler can use up to 1000 litres per hour; that's more than 12 baths.
- Recycle the water in your paddling pool. Use it to wash your car, water your plants or wash your dog.

For more tips and advice on how to save water please download our water saving flyer.

[Download Here](#)



A2 Leaflet examples of water efficiency advice

Below are examples of water efficiency advice.

Reduce your use

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

What you can do in the kitchen

-  Save 10 litres of water by waiting to use your washing machine until you have one full load, and not two half loads
-  Wash your fruit and vegetables in a bowl of water instead of under a running tap. This can save up to 15 litres each minute.
-  Fill up your dishwasher before putting it on. Dishwashers use around 15 litres of water with every wash

What you can do in the garden

-  Water butts are a great way to collect water for your garden. Rain could fill up your water butt 450 times a year.
-  Save water by watering your plants at dawn or dusk. This will reduce the water lost to evaporation.
-  Use a watering can. A hose or sprinkler can use up to 1,000 litres per hour; that's more than 12 baths.
-  Recycle the water in your paddling pool. Use it to wash your car, water your plants, or wash your dog.

Using water wisely helps us reduce the extra water we take from rivers and aquifers.

This protects our water resources and the wildlife that live in them and rely on them for their survival.

What you can do in the bathroom



By turning your tap off whilst you brush your teeth, you can stop up to 15 litres of water going to waste per minute



Reducing your shower from 10 minutes to 4 minutes will save more than 300 litres of water every week



Baths use more water than showers. By filling your bath by 1 inch less, you save 5 litres of water



Check your toilets for leaks. Add food dye to your cistern and leave it overnight. If the bowl is coloured in the morning, this indicates that you have a leak. An approved plumber should fix internal leaks - find one at watersafe.org.uk.

Know your usage

A cubic metre (m³) of water is 1,000 litres. This is equivalent to:

- 13 baths
- 14 loads of washing
- 28 showers, or;
- 111 toilet flushes

The average person in the UK uses 142 litres of water every day (ccwater.org.uk).

You can keep track of how much water you use each day by filling out our Water Audit Checklist, which can be found online at www.iwnl.co.uk, or by scanning this QR code.



Water Audit Checklist



A3 Developing Drought: Water Audit

Below are examples of water efficiency advice.

Use our water audit form to keep an eye on your water consumption. Saving water can help the environment, and it can help you save money on your water bills too.

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			
Watering can	4		
Hosepipe/sprinkler for 1 hour	540		

DID YOU KNOW?

One cubic metre of water is 1,000 litres.

This is equivalent to:

- 13 baths
- 14 loads of washing
- 28 showers
- 111 toilet flushes.

The average person in the UK uses 142 litres of water every day.



Water saving tips

BATHROOM:

- By turning your tap off whilst you brush your teeth, you can stop up to 15 litres of water going to waste per minute.
- Reduce your shower time by a minute and save up to 15 litres.
- Baths use more water than showers. By filling your bath just 1 inch less, you save 5 litres of water.



KITCHEN:

- A standard washing machine uses 50 litres of water per load. Save water by waiting until you have a full load.
- Save energy and water by filling the kettle with only the amount of water needed.
- Help save water by fixing internal leaks using a Water Regs UK approved plumber. A dripping tap could fill a bath in a day.



GARDEN:

- Save water by watering your plants at dawn or dusk, this will reduce the water lost to evaporation.
- Hoses and sprinklers typically use 1000 litres per hour, that's more than 12 baths. By using a watering can, you'll help save water.



A4 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 prohibitions 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 Statutory 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, 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.



A5 Level 3 – Drought: Example wording for the notification of water use restrictions under a Drought Order

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

Independent Water Network Limited
Sections 73 and 74(2)(B) and Schedule 8 of The Water Resources Act 1991

Due to the threat of a serious deficiency in supplies of water within the affected area, caused by an exceptional shortage of rainfall, Independent Water Network Limited, Woolpit Business Park, Synergy House, Woolpit, Bury Saint Edmunds, IP30 9UP (“IWNL”) is applying to Welsh Ministers for a Drought Order under sections 73 and 74(2)(b) of the Water Resources Act 1991.

The affected area includes all IWNL Supply Areas LOCATION. The affected area is also indicated on the map accompanying this notice.

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 which can be prohibited or limited under the Drought Order are those prescribed by Welsh Ministers as defined in Drought Plan (Wales) Directions. A copy of The Direction can be found here: <https://www.gov.uk/government/publications/the-drought-direction-2011>.

These activities are in addition to the activities covered by the Temporary Use Ban which has been in place since DATE for domestic customers in this area. Further details on IWNL’s Temporary Use Ban in the area may be found: <https://www.iwnl.co.uk/homeowners/drought-measures/>

This notice and further details concerning the prohibitions and current drought and water efficiency advice may be found on IWNL’s website here: <https://www.iwnl.co.uk/homeowners/drought-measures/>

Thank you for your support at this important time.

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 using a hosepipe

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 using a hosepipe

Purpose 6: Cleaning of any exterior part of a non-domestic building or a non-domestic wall using a hosepipe

Purpose 7: Cleaning a window of a non-domestic building using a hosepipe

Purpose 8: Cleaning industrial plant using a hosepipe

Purpose 9: Suppressing dust using a hosepipe

Purpose 10: Operating a cistern in any building that is unoccupied and closed

The following definitions apply:

- “Commercial Premises” means any land, building or other structure which is not used principally as a dwelling.
- “Health or Safety Reasons” means removing or minimising risk to human or animal health or safety; and preventing or controlling the spread of causative agents of disease.
- “Hosepipe” includes anything designed, adapted or used to serve the same purpose as a hosepipe. The prohibitions



apply whether or not any device is attached to the hosepipe, such as a sprinkler for example.

- “National Plant Collection” means a plant collection which is part of Plant Heritage (formerly the National Council for the Conservation of Plants and Gardens’ National Plant Collection scheme).
- “Non-domestic building” means a building or any other structure which is not principally used as a dwelling.
- “Temporary garden or flower display” means a display at a show or exhibition for no longer than 7 days;
- “Using a hosepipe” includes drawing water supplied by IWNL through a hosepipe from a container and filling a container with water supplied by IWNL by means of a hosepipe.

Applicable definitions may be found in:

- The Drought Direction 2011, which is available at: <https://www.gov.uk/government/publications/thedrought-direction-2011>
- The Water Use (Temporary Bans) Order 2010, which is available at: <https://www.legislation.gov.uk/uksi/2010/2231/contents/made>

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 practises.

- 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 3: a pool is not open to the public if it may only be used by paying members of an affiliated club or organisation.
- Purpose 4: 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 handheld container which is filled with water drawn directly from a tap.
- Purpose 5: does not include filling or maintaining a domestic pond using a hosepipe.
- Purpose 6: permits the cleaning of any vehicle, boat, aircraft or railway rolling stock for health or safety reasons.
- Purpose 7: permits the cleaning of any exterior part of a non-domestic building or a non-domestic wall for health or safety reasons.
- Purpose 8: permits the cleaning a window of a non-domestic building using a hosepipe for health or safety reasons.
- Purpose 9: 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.

Non-Statutory Common Exceptions

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

The criteria for a Non-Statutory Common Exception include, for example:

- Use of a hosepipe by individuals who are either registered on IWNL’s Priority Services Register, are a Blue Badge holder or WaterSure customer, and who have mobility or health conditions that prevent them from using a watering can or bucket.

Restricted uses that would be exempt under this Non-Statutory Common Exception:

- Purpose 1: Watering outdoor plants on commercial premises
- Purpose 2: Filling or maintaining a non-domestic swimming or paddling pool
- Purpose 3: Operating a mechanical vehicle-washer
- Purpose 4: Cleaning any vehicle, boat, aircraft or railway rolling stock
- Purpose 5: Cleaning non-domestic premises



- Purpose 6: Cleaning a window of a non-domestic building
- Purpose 7: Cleaning industrial plant
- Purpose 8: Suppressing dust
- Purpose 9: Operating cisterns

“Blue Badge” means a current valid Blue Badge issued by the relevant Local Authority in accordance with the Disabled Persons (Badges for Motor Vehicles)(England) Regulations 2000 (SI 2000/682) and Section 21 of the Chronically Sick and Disabled Persons Act 1970 (as amended).

Non-Statutory Bespoke Exceptions

Customers can make representation to IWNL to receive a Non-Statutory Bespoke Exception to use water for restricted use. If permission for a Non-Statutory Bespoke Exception is given, it is requested that customers use water wisely and adopt water efficient practises.

A full list of events considered to be Non-Statutory Bespoke Exceptions will be published on the IWNL’s website here: <https://www.iwnl.co.uk/homeowners/drought-measures/>

IWNL follows a phased approach to reduce demand in the event of a drought. A full explanation of drought triggers and proposed actions may be found in IWNL’s Drought Plan 2021 which is available here: <https://www.iwnl.co.uk/about-us/our-drought-plan/>

Please note that the Non-Statutory Bespoke Exceptions (including exceptions relating to the Temporary Use Bans which will be in place from DATE may change based on whether drought conditions worsen and in accordance with the phased approach in IWNL’s Drought Plan. A full list of the statutory exceptions may be found in The Drought Direction 2011, which is available here: <https://www.gov.uk/government/publications/the-drought-direction-2011>

Representations

Anyone may inspect the proposals, free of charge, at the following locations, during the specified times for a period of seven calendar days:

- Dwr Cymru Welsh Water head office at Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT; Between the hours of 10:00 – 16:00, Monday to Friday

Summaries of the application will be hosted at <https://www.iwnl.co.uk/homeowners/drought-measures/>

Objections may be made in writing to Welsh Ministers, Water Branch, Welsh Government, Cathays Park, Cardiff, CF10 3NQ (or by e-mail to WaterEPC@gov.wales), giving an address to which correspondence relating to the objection may be sent. Objections should be made immediately.

Next Steps

Welsh Ministers will decide whether a public hearing or inquiry shall be convened. Further information on this will be available online at <https://www.iwnl.co.uk/homeowners/drought-measures/>. If Welsh Ministers grants the drought order, IWNL will publish another notice confirming this, which will include the date that the restrictions commence.

Independent Water Networks Limited



A6 Example wording for the revocation of restrictions

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

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]





Drought Plan 2026

APPENDIX B: INCUMBENT COMMUNICATION

March 2026



B1 Incumbent Communication

Throughout the year, IWNL participates in regional meetings with Water Resources West and Water Resources North, as well as holding regular liaison meetings with incumbent water companies.

When water resources become stressed and there is a chance that Temporary Use Bans (TUBs) or other restrictions may be needed, we stay in close and regular contact with a wide range of partners across the water sector. These discussions take place through scheduled liaison meetings as well as more frequent drought focused sessions, and we also hold ad hoc conversations whenever new information emerges. Together, these help us build a clear, shared picture of how conditions are developing and what actions may be required. Across these meetings we talk about the current water resource situation, forecasts for the weeks and months ahead, how our networks are performing, and any operational pressures that might affect supply. We also share insights on customer behaviour and review any risks to public water supplies.

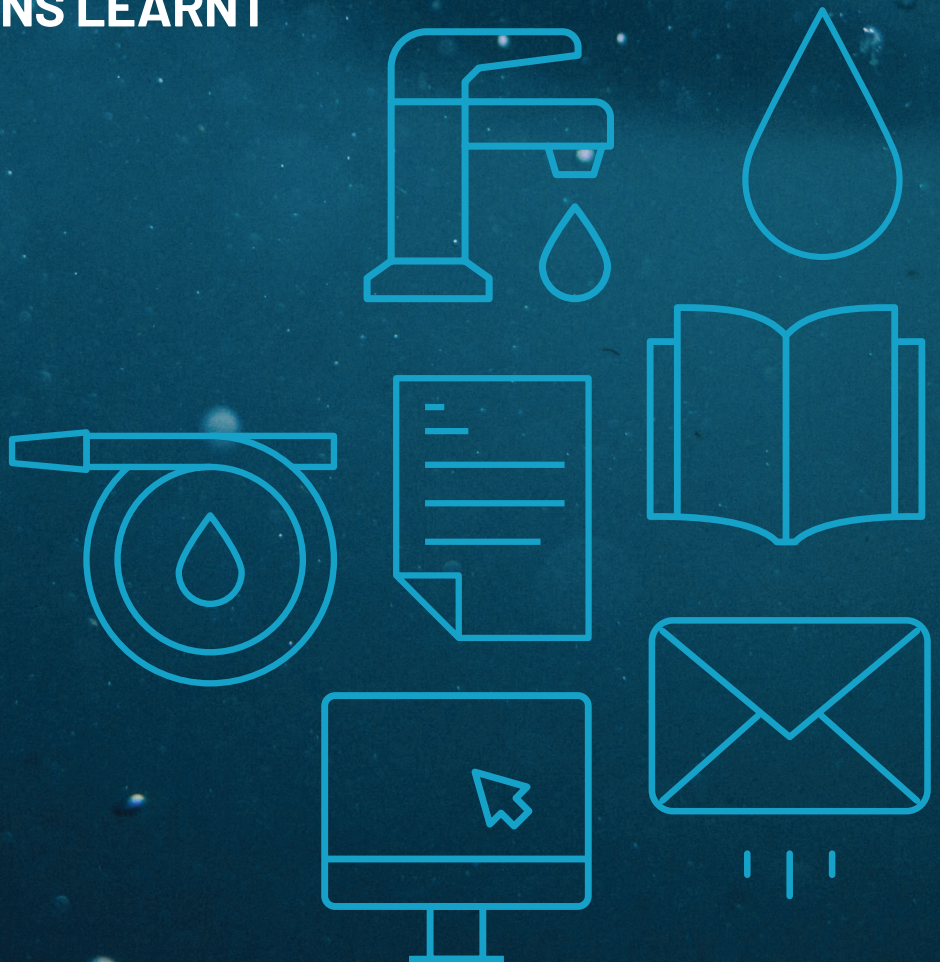
Crucially, we use these conversations to coordinate customer communications. By aligning our messages, timing, and advice with other water companies, we make sure that customers across our region receive clear, consistent information – especially in areas where supply boundaries meet or where more than one company plays a role. This collaborative approach helps us plan effectively, respond quickly when conditions change, and provide customers with timely updates so they understand the situation and any steps being taken to protect supplies.



Drought Plan 2026

APPENDIX C: LESSONS LEARNT

March 2026



C1 Lessons learnt

1. Working Together Through Clear and Appropriate Information Sharing

Many NAVs have shown they are willing to enter into Non Disclosure Agreements where necessary. This creates a valuable opportunity to improve the quality of information shared during drought conditions. By using NDAs in the right way, all parties can access the operational detail they need to understand system pressures and plan effectively. This would support more aligned responses and ultimately strengthen joint decision making.

2. The Importance of Timely, Open Communication

Feedback also highlighted the need for more timely and transparent communication between incumbents and NAVs. Delays or gaps in information can make it difficult for NAVs to anticipate changes, adjust operations, and keep customers well informed. Improving transparency, particularly around drought triggers, resource outlooks, and planned actions, would support better coordination and help ensure responses are proactive rather than reactive.

3. Making Drought Processes More Efficient by Updating Legislation

A further observation relates to the current use of drought permits. These permits can introduce delays and administrative challenges at the very moments when quick action is most important. Streamlining legislation so that key powers and flexibilities are included in standard processes would reduce reliance on discretionary permits and enable faster, more agile decision making during drought escalation.

