

Final Drought Plan 2022 (Published 2024)



ESP Water Limited
February 2024 – Version 1.0

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0 Governance

Security Statement

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

Signed:

A handwritten signature in black ink, appearing to read 'Simon Lees'.

Simon Lees

ESPUG Operations Director, ESP Utilities Group

Commercial Statement

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

A handwritten signature in black ink, appearing to read 'Stephen Morris'.

Stephen Morris

Water Managing Director, ESP Water Limited

1 Introduction

1.1 This Drought Plan

This is ESP Water's (ESPW) first Drought Plan since appointment as a water and sewerage undertaker in July 2022. It considers sites for which we have an appointment or variations to that appointment as of 01 January 2024, all of which are in England only. As further variations to our appointments are granted we will add additional sites annually to this final drought plan.

As part of the development of our Drought Plan, we previously published it on our website to facilitate consultation with statutory and non-statutory consultees as well as to seek feedback from our customers. These consultees included:

- CCW (Consumer Council for Water)
- Defra
- Drinking Water Inspectorate (DWI)
- Environment Agency
- Environmental charities
- Incumbents for which we gain a supply from
- Local authorities
- Natural England
- Non household water retailers
- Ofwat
- Regional water resource groups.

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

The public consultation ran from 24 April 2023 until 09 June 2023. We received feedback from 3 stakeholders as part of this consultation process and we updated our draft Drought plan, which formed part of our statement of response. This was available on our website on 04 August 2023.

The final Drought Plan was approved by the Secretary of State on 09 January 2024 and now be published on our website at (www.espug.com) and at our registered office by 09 February 2024.

1.2 Who we are.

ESP Water (ESPW) is a NAV company (New appointment and Variation) who provides water and wastewater services under an appointment granted by Ofwat, the economic regulator for the water and sewerage industry in England and Wales, as set out in the Water Industry Act 1991.

We were established in 2021 and are part of ESP Utilities group (ESPUG), which has been providing Gas & Electricity to properties for over 20 years as an asset adoption company. ESPUG currently has over 1 million properties connected on a variety of residential, industrial, and commercial networks.

ESPUG is partly owned by 3i Investments PLC, and our history is summarised in the diagram (Figure 1) below. Further details on the company structure can be found on our website www.espwater.com.

Our History

THE LARGEST ADOPTION ONLY NETWORK OPERATOR

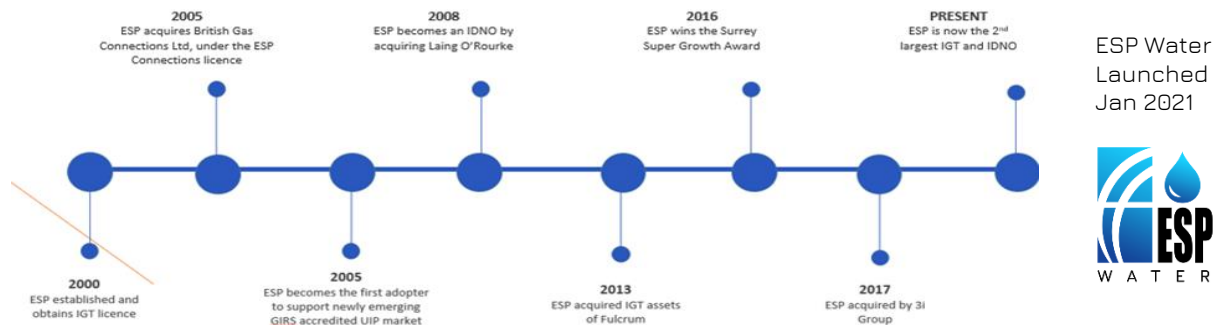


Figure 1 – ESPUG History

With the introduction of competition within the water industry, and following amendments to the Water Act 2003, the opportunity was created for the independent provision of water and sewerage services by new independent license holders. NAV companies can therefore offer water and/or sewerage services within a specified geographic area instead of the existing appointee (also known as an Incumbent or upstream water company). As a result, developers and large non-household customers can choose their supplier for these services and enjoy the benefits of a more competitive market.



We do not own or operate water sources. All our supplies are through bulk connections from the local incumbent water company. We have negotiated Bulk Supply Agreements (BSAs) with the incumbent water companies for all the sites we supply. These agreements are designed to secure adequate supplies for our customers throughout the 25-year planning period, including sufficient headroom to allow for uncertainties in demand forecasts. Also, the BSA agreed supply volume is an annual average so covers periods of higher and lower demand throughout the year. Both factors ensure that should there be a drought customers will not be placed at any risk greater than if supplied directly by the incumbent.

We were granted our first appointment on 24 July 2022 for a site in Salford, Manchester called Merchant's Wharf. Subsequently, variations to this appointment have been granted for further sites, which are listed in Appendix 1. As we grow as a business and become the water and sewerage undertaker for more sites, we will add

them to this appendix within our drought plan at least as part of our annual review in line with statutory requirements.

1.3 Our Water Resource Management Plan (WRMP)

This plan is our first Drought plan, and it should be read in conjunction with our draft WRMP, which is available to view on our website at [WRMP](#).

The public consultation of our WRMP document has closed and we published our statement of response to comments on our WRMP on 01 June 2023, also on our website. We will then publish our final WRMP later in 2024 when we receive approval from Defra.

Our Drought Plan and WRMP both contain details of the levels of service we are committed to in each incumbent region and how we collaborate with the incumbent companies to ensure adequate supplies. We also demonstrate in our WRMP how we plan to reduce demand over the 25 years and meet the consumption target of 110 litres per head per day across our developments by 2050. This includes minimising leakage and encouraging our customers to be water efficient through media campaigns and the introduction of smart meters. This approach is illustrated in Figure 2 below.



Figure 2 – Demand Reduction Strategy

We also explain in our WRMP how we plan to collaborate regionally. There are 5 regional groups across England and Wales as shown in Figure 3 below and we, as part of the Independent Networks Association (INA), which represents NAV companies, have recently joined these groups. Going forward this will enable us to understand the water resource planning in the region and be included in the discussion about demand management. With regards to the Incumbent's, ESP is now communicating with all 7 Incumbent's water resources teams to enable us to have consistent approaches to water resource management, to ensure sufficient supplies for our customers.



Figure 3 – Regional Water Resource Groups.

2. What is a Drought?

A drought can be defined as a prolonged period of abnormally low rainfall, leading to a shortage of water and water companies need to have a plan for dealing with these scenarios. These scenarios are modelled by each Incumbent, but we have also looked at the likelihood of drought scenarios in each of our developments using the predictions the incumbents have made for each Water Resource Zone (WRZ) we take a supply from within our WRMP. Further detail can be found at [WRMP](#)

The Incumbent water companies will monitor various indicators of water availability, which include:

- rainfall levels
- river flows
- groundwater levels
- reservoir stocks

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

If these conditions persist for several consecutive months, additional pressure is placed on water sources. Also increased demand for water by our customers in response to dry and/or hot weather conditions can increase the pressure on water sources. If the dry weather continues, the available water resources to feed the public water supply system will be depleted even if it starts raining again.

As a NAV, we work closely with the Incumbent water companies we get a supply from and have agreed a set of triggers and actions, which are all summarised in our Drought Plan in later sections. These triggers and actions can be very different depending on where our sites are in the country and which incumbent WRZ our supply comes from. This is because they have different drought conditions, and the approach varies by Incumbent water companies. There may be occasions where we implement our own measures in support of our consumers in a drought situation and these will be on a site-by-site basis. A WRZ, as established by an Incumbent water company, is an area which is served by a common water source. The variations across the different Incumbents are discussed in Appendix 1 of this Drought Plan.

Further details on Droughts can be found on the Environment Agency's website www.gov.uk/government/publications/drought-managing-water-supply/drought-how-water-companies-plan-for-dry-weather-and-drought.

2.1 Testing our Drought Plan

To ensure we have developed a robust Drought plan it is important that it is tested and validated. In 2023 we were appointed to a site, The Grange, Bideford in the South West Water (SWW) region and shortly afterwards SWW extended their temporary use ban (TUB) to cover north Devon, where our site is situated. We were therefore obliged to issue a TUB for our site. This enabled us to test our draft Drought Plan including issuing the newspaper articles and further develop our strategy for other sites.



We are also engaging with selected incumbents to carry out desk top validation of the Drought plan and the triggers. We are currently working with Severn Trent Water on consistent customer water efficiency messaging and have regular meetings with them to keep us up to date on the drought situation.

3. What we will do in a Drought

This section summarises our general approach to drought triggers. For specific details please go to Appendix 1 for each site.

3.1 Our levels of service

As we receive a supply of water from an Incumbent our levels of service, and what we will do for our customers in a drought, will match the levels of service and actions of the Incumbent water company. There are four general Levels of Service as shown in Figure 4 below. Recovery from drought can occur after any level.

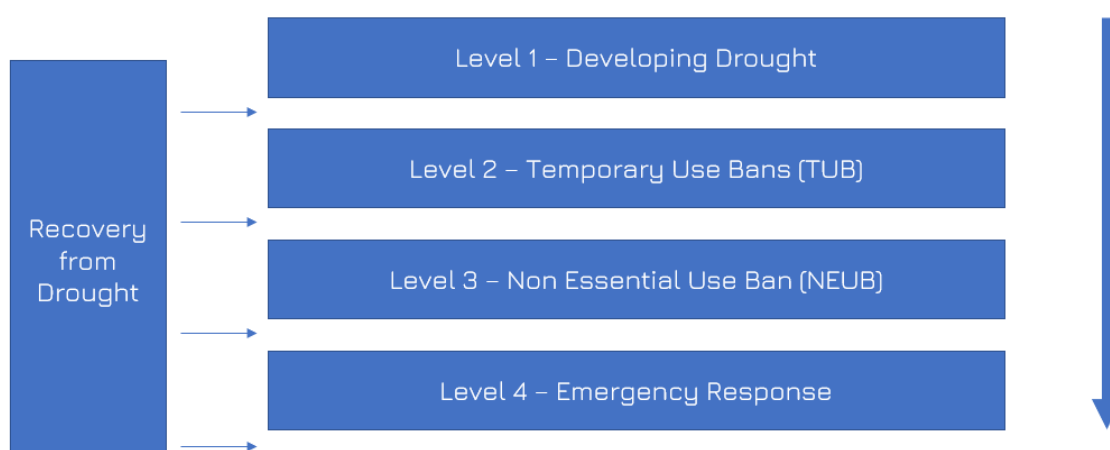


Figure 4 – ESPW Levels of Service

Each level is triggered by an action or communication from either Defra or the Incumbent. Each BSA also has clauses relating to our response to an emerging drought situation. The triggers and levels are introduced in Table 1 below and the following sections explains them in more detail.

We will work closely with the Incumbent as a drought develops to ensure that all parties have a clear understanding of the situation and that they understand the measures required to protect water supplies and the environment, and the communications necessary. The key actions to be taken at each of the four identified service levels are set out below with the management actions and communication strategy also included.

An essential part of the drought management process is to ensure that all stakeholders are aware of a developing drought and that they are a part of the decision-making process before any drought actions are put in place. We are committed to ensuring that communications with our customers and any subsequent actions will closely mirror those of any incumbent supplier. And we will ensure that messages are consistent and accurate and will be clear as to what we are asking our customers to do. A key consideration is that a drought developing in different areas at different times will require communication to be tuned to each area. Our Customer Fulfilment teams are familiar with working on a site-by-site basis and can therefore communicate effectively and appropriately on a developing drought scenario.

Table 1 – Our Levels of Service

Our Level of Service	Trigger	Event Owner	Possible Drought Measures by Us
1 (Developing Drought)	Communication with Defra and incumbent water companies about possible water shortages.	ESP Water Senior Management	Media/water efficiency campaign and advice on our website
2 (TUB)	Communication by incumbent water company that they have reached their trigger level for a Temporary Use Ban (TUB).	ESPW Managing Director	Instigate a Temporary Use Ban
3 (NEUB)	Communication by incumbent water company that they have reached their trigger level for a Drought Order and/or Extreme Drought Management Actions.	ESPUG Executive Team	Issue an Ordinary Drought Order to Restrict Water Use (Non-essential use ban)
4 (Emergency Response)	Communication by incumbent water company that they have reached their trigger level for an Emergency Drought Order.	ESPUG Executive Team	Activate ESPW emergency procedures regarding drought events
Recovery from Drought	Communication by incumbent water company that they have reached their trigger level for a Return to Normal Services (this can occur after any stage).	ESPW Senior Management	Media campaign

At all stages we will seek to communicate in a timely manner via the company's website www.espwater.co.uk.

3.2 Our Stakeholders

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

- Incumbent Water Companies** – As we are reliant on water supply management by another water company, communication channels between the incumbent and the NAV are defined in the bulk supply contracts. This is to ensure that any situation which could impact both companies is managed in a coordinated manner. We also have regular meetings with the Incumbent's to ensure we are prepared for any changes in the drought situation. The meeting frequency will increase as triggers are met and is described further below.

To ensure regular communication with the Incumbent water companies we have developed a communications plan. The frequency of liaison depends on the level of service as described in Table 2 below.

Table 2 – Minimum liaison frequency

Service Level	Frequency
Level 1 – Developing Drought	Quarterly
Level 2 – TUB	Monthly
Level 3 – NEUB	Weekly
Level 4 – Emergency Response	Daily

- **Government, Regulatory and other parties** – Timely communication with Government, regulatory bodies (including Defra, Environment Agency and Ofwat) and the Consumer Council for Water is an essential component of our drought communications plan. We will maintain a single point of contact within ESP for these communications. We are also part of the National Drought Management forum.
- **Customer Communications** – Drought communications with our customers is our responsibility and we will build on our existing communication channels and customer water efficiency promotion activities. Special consideration will be given to any vulnerable consumers on our Priority Services Register (PSR).
- **Media Communications** – Media communications relating to drought conditions and management measures will be carefully coordinated with the Incumbent Water company, the Environment Agency, and the Consumer Council for Water (CCW) to ensure there is no confusion in the public message.
- **Staff** – Our staff will be trained in this Drought Plan and will be kept informed should a drought event occur.



Fire Service

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

3.3 UKWIR and CCW Reports

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

<https://ukwir.org/update-to-the-drought-code-of-practice-2013>

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

Principles

- Ensure a consistent and transparent approach.
- Ensure the water use restrictions are proportionate.
- Communicate clearly with customers and the wider public/users.
- Consider representations in a fair way.

Actions:

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

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

With regards to the Consumer Council for Water (CCW) they provide support to customers on water saving and what to do if there are drought restrictions. They also published a document in 2013, "Understanding drought and resilience" to help water companies understand customer attitudes and perceptions of drought. When deciding on new customer messaging, we will ensure we refer to the guidance from CCW. More information is available on their website Drought - CCW.

Both the UKWIR reports and CCW information were used to develop our communication material and our Incumbent communication plan. The guidance also helped us to

develop our plans for our Drought Management Group and ensure this Drought plan is a tactical plan.

3.4 Level 1 – Developing Drought

Level 1 is a developing drought or increased drought risk. Should we reach this trigger, we will commence discussions with the relevant incumbent water company (bulk supplier) and Defra. A media / direct communication campaign with customers will be initiated to encourage conservation of water, by following some water-saving suggestions. An example of the communication is included in Appendix 2. We will also put advice on our website www.espug.com

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

Our business-as-usual leakage activities include reviewing consumption from our meters, reviewing logger data, providing advice to our consumers on spotting leaks, and site inspections to ensure the quality of installation of our pipework. At Level 1 we will increase our campaigns to encourage customers to tell us about leaks and provide information on customer bills. We will also increase our monitoring of leakage on our sites by more frequent reading of our meter reads and monitoring demand. We will also seek to fix leaks quicker and support customers in repairing supply pipe leaks. We will also target our site inspections to increase the frequency in regions of Level 1 droughts.

As a drought develops, we will also increase our promotion of the need for consumers to conserve water including where appropriate the use of water efficiency devices such as leaky loo strips and shower timers. This is in line with our WRMP. We will also consider implementing other demand management measures such as targeting high users of water or NHH properties that higher than necessary use. There may also be ground maintenance activities on our developments that could be modified to save water for example.

This level will be managed by a nominated member of the ESPW Senior Management Team and communication with all our 5 stakeholder groups will be initiated. This will include the message about “using water wisely”. We will also utilise wider communication media available to us, to enhance our messages and encourage customers to visit our website, where further detail will be available on the environmental impact of water use on the WRZ of the affected source, water saving ideas and to provide the opportunity for customer feedback. Our aim will be to encourage customers to voluntarily limit their non-essential uses of water, with tips and ideas provided by us to help them reduce their water consumption. Table 3 summarises this level below:

Level 1	
What is Level 1?	Developing Drought
What is the trigger?	Notified by the Incumbent or Defra of a water shortage.
Who is responsible?	ESPW Senior Management Team
What actions will we take?	Increase our media campaign and information for customers about saving water and spotting leaks. Increased monitoring of demand to identify leakage, more site visits and if found, fix leaks more quickly. Consider additional demand management measures.
What is the notification process?	We will send customers information about saving water and provide information on water saving devices.
What does it mean to you?	Please help us to save water in this time of water scarcity.

Table 3 – Level 1 actions

3.5 Level 2 – Temporary Use Bans (TUB)

Level 2 is the point at which the incumbent we take a supply from formally advises us that it is intending to put a TUB in place. We will continue with our actions at Level 1, which will include scaling up our customer campaigns appropriately as dry weather takes hold, but we will also start our own preparations for drawing up public notices relating to the issuing of a TUB. The specific actions could vary depending on the Incumbent company we are working with.

It is also important that we monitor leakage and keep any leakage at a minimum building on our monitoring from the previous level. This will include more frequent reading of meters in the developments and more targeted site inspections. We will also endeavour to fix any leaks quicker.

What is a TUB?

Formerly known as a Hosepipe Ban, the TUB permits water companies to enforce a range of restrictions and is enabled by the Flood and Water Management Act 2010. A TUB will only be implemented following a consultation period. The consultation date for any affected zones will match that of the incumbent supplier to ensure consistency of approach. The consultation period will generally be aligned with that of the incumbent supplier and will allow customers to make representations. A TUB is likely to cover restrictions on the following activities:

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

- Watering plants on domestic or non-commercial premises using a hosepipe.
- Filling or maintaining a domestic pond using a hosepipe.

This level will be led by the ESPW Water Managing Director and communication with all our 5 stakeholder groups will continue building on the meetings already set up whilst in Level 1. A Drought Management Group will also be formed, which is described further in Section 4.0.

Communication will become more frequent if the drought intensifies. Communications will be regular and timely to enable feedback and discussion prior to any final decisions being made. We will also prepare at this stage for Level 3 should it look likely that this will be required.

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

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

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

What is the process for issuing a TUB?

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

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

If we have more than one site in an incumbent area that has issued a TUB, we will only issue one TUB ourselves listing all the sites that it covers.

Any additional exemptions or concessions will be dealt with in accordance with the UKWIR Code of Practice and Guidance on Water Use Restrictions (2013) and we will follow the four principles outlined in this Code of Practice and included earlier in Section 3.3.

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

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

The TUB will be lifted in tandem with the relevant Incumbent water company when water resources have returned to a normal level of risk. We will follow the statutory process as outlined in the Water Industry Act 1991. Table 4 summarises this level below:

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

Table 4 – Level 2 actions

3.6 Level 3 – Non-Essential Use Ban (NEUB)

Level 3 is the implementation of a NEUB. Again, we will continue with Level 1 & 2 actions and increase our media campaign. Increased consultation with applicable parties, such as MOSL, CC Water, Ofwat, EA and Defra will also take place.

What is a NEUB?

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

What is the process for issuing a NEUB?

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

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

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

If we have more than one site in an incumbent area that has issued a NEUB, we will only issue one NEUB ourselves listing all the sites that it covers.

This level will be led by the ESPW Water Managing Director on behalf of the ESPUG Executive Team and communication with all our 5 stakeholder groups will continue, building on the meetings already set up whilst in Levels 1 & 2. The Drought Management Group will continue to meet, which is described further in Section 4.0.

We will also follow up our communications with proactive telephone calls or face-to-face meetings with our major NHH customers or their Retailer. We will communicate with our customers in a similar manner in the event of being granted an ordinary drought order to further restrict non-essential water use.

At this level, incumbent companies may start to introduce pressure management measures during this Level 3 phase, where the pressure in the water mains may be reduced to decrease any water loss through leakage. This could avoid the need to move to Level 4 and we will work with the Incumbents closely to ensure supplies are maintained to our customers. Table 5 summarises this level below:

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

Table 5 – Level 3 actions



3.7 Level 4 – Emergency Response

At Level 4, we will continue the earlier actions at Levels 1, 2 and 3 and we will implement the Emergency Drought Order, which may include rota cuts or the introduction of standpipes for customer to get their water from. These options are described in more detail below. Vulnerable groups will be given additional support.

What types of Emergency Drought Order measures are there?

In situations where severe and continuing drought results in a Level 4 Emergency Drought Order, further actions may be required to conserve supplies. The likelihood of these actions being necessary is very low. We include a brief description here for completeness.

Rota Cuts are where a company physically restricts supply to their networks. Supplies will be available in the normal way but only for fixed periods, which will be identified in notifications to customers.

Standpipes are where the networks are configured such that supplies will only be available for collection from certain locations. Customers will be advised in advance and assistance will be given to those less able to obtain supplies.

Pressure Management is often used by companies in the normal course of their daily activities, generally to reduce leakage. It may be used more severely to reduce the likelihood of the need for an emergency drought order to bring in Rota Cuts and Standpipes for a Level 4 event.

Also, if a Drought was to reach Level 4 then there is a clause in the bulk supply contracts between ESP Water and the incumbent whereby supplies may be limited. (Force Majeure). This means we must have alternative arrangements to maintain customer supplies. This will only be the case when all actions have been taken under service levels 1 to 3. This level will be managed by the ESPUG Executive Team and communication with all our 5 stakeholder groups will continue as described earlier. Table 6 summarises this level below:

Level 4	
What is Level 4?	Emergency Response
What is the trigger?	Notified by the Incumbent that they have reached their trigger level for an emergency response.
Whose responsible?	ESPUG Executive Team
What actions will we take?	We will communicate with all our customers and explained what our emergency response is. i.e., rota cuts or use of standpipes.
What is the notification process?	This will be by letter at least two weeks before it is issued.
What does it mean to you?	Customers will need to follow the advice given in this emergency situation.

Table 6 – Level 4 actions

4. Drought Management Structure

4.1. Drought Management Group

To ensure security of supply to our customers, we operate an incident response plan which covers emergency situations including droughts. In the event of an impending drought, we will work with the incumbent water company to ensure a coordinated response to protect both customers and the environment as detailed further below.

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

A Drought Management Group (DMG) will be convened to help manage the drought actions at each level as shown in Figure 5. The responsible person or group for convening the DMG and Recovering from Drought Group is represented by the green boxes and the diagram includes a list of the main activities at each level.

The DMG will consist of all or some of the following people as detailed by the level reached and will be attended by other subject matter experts as deemed necessary by the ESPW Managing Director and as drought requirements escalate:

ESPW Managing Director

This person is responsible for convening the DMG if the triggers for Level 2 are reached. This includes implementing the action plan for issuing a TUB, ensuring liaison with incumbents and stakeholders is taking place and ensuring clear and transparent messaging for our customers is taking place. They will then chair the DMG if Level 3 or 4 is reached.

ESPUG Operations Director

The Operations Director is responsible for the field and customer services teams and will therefore ensure actions from the DMG are implemented as planned. This is relevant for all levels of Drought and recovery from Drought.

Head of Regulation

This person is responsible for liaison with our regulators and with the incumbents and ensuring the company meets the obligations of the regulations at all levels. This role will also manage the communications plan at each level and provide guidance to the DMG referring to best practice. If newspaper articles are required, they will also liaise with our third-party PR contractor who monitors our social media and can facilitate organising the articles. This role is also responsible for managing the activities associated with recovery from drought.

Head of Water

This person is responsible for ensuring operational actions are carried out including monitoring leakage and advising operational staff on site visits as appropriate. They will be involved at all levels of Drought.

Customer and Consumer Operations Manager

This person is responsible for customer engagement and staff engagement. They manage the customer services teams and will ensure they are appropriately trained and provide consistent messages to our customers. They will also ensure our website is kept up to date. In the event of a NEUB (Level 3), they will be responsible for liaison with the NHH customers that we have.

Water Quality Manager

This person will support the wider teams in customer services on messaging and ensure drinking water quality is maintained throughout any drought at all levels.

Operational Engineer

This person is responsible for field advice and customer facing conversations both domestic and NHH and will take the lead from the Head of Water as required.

ESPUG Executive Team (Level 3 and 4 only)

The Exec will oversee the management of the DMG and the action plans if Level 3 or 4 is reached. The ESPW Managing Director will chair the DMG, but the CFO and CEO will also be in attendance. Regular communication with ESPUG staff will also take place.

As mentioned in Section 3.2 a communication plan will be developed with the various incumbents depending on the trigger reached and the DMG will meet at least monthly at level 2, weekly at level 3 and daily at level 4. This is illustrated in Table 7 below, which explains that currently our DMG is meeting monthly due to the TUBs in place in the South West Water region.

Status		26/07/2023			
Current					
		Liaison Minimum Frequency			
Incumbent	BAU	Level 1	Level 2	Level 3	Level 4
Anglian Water	Not applicable	Quarterly	Monthly	Weekly	Daily
Northumbrian Water	Not applicable	Quarterly	Monthly	Weekly	Daily
Severn Trent Water	Not applicable	Quarterly	Monthly	Weekly	Daily
South Staffs Water	Not applicable	Quarterly	Monthly	Weekly	Daily
South West Water	Not applicable	Quarterly	Monthly	Weekly	Daily
Thames Water	Not applicable	Quarterly	Monthly	Weekly	Daily
United Utilities	Not applicable	Quarterly	Monthly	Weekly	Daily
Wessex Water	Not applicable	Quarterly	Monthly	Weekly	Daily
Yorkshire Water	Not applicable	Quarterly	Monthly	Weekly	Daily

Table 7 – Communication plan

Consultation with Government, regulators, and stakeholders, including the media, will be directed through the Head of Regulatory Compliance (Water).

Drought Management Group



Figure 5 – Our management approach

4.2 Drought Escalation and Resources

ESPW activities are an integrated part of the group (ESPUG) multi utility (MU) functions. Within each of these MU teams there are specialist water and wastewater staff. This allows the company to draw upon experienced staff with deep and extensive experience of dealing with for example, incidents, consumers, and emergency escalations. Should a drought situation escalate such that more than one incumbent reaches their drought triggers than we will set up Sub-DMGs for each incumbent made up of additional people from the wider business. This will be coordinated by Head of Regulation and monitored by ESP Water Managing Director.

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

4.3 Monitoring the effectiveness of our communications and our plan.

We will monitor our drought communications to inform any necessary adjustments to our communications strategy. This will include the following activities, which will be triggered at the level indicated in the Table 8.

Measure	L1	L2	L3	L4	Notes
Proactive contact of a sample of our customers by telephone as an event escalates.		✓			Following issue of a TUB to a site with >100 properties.
Conducting a sample survey by email of our customers to gather feedback on the effectiveness of our communications in relation to the specific drought management measures being communicated		✓	✓		Following issue of a TUB to a site with >100 properties. For a NEUB where we have more than 50 NHH properties
Reviewing the data from the survey and the customer feedback to determine whether modifications to our communications approach is required.		✓	✓		Linked to above.
Increased monitoring and use of social media as drought escalates feeding back any lessons into our communication strategy.	✓				This will be done as drought develops.
Monitoring how demand changes because of our customer communication activities.	✓	✓	✓	✓	Demand will be regularly monitored.
Obtaining regular bulk meter readings from the incumbent, weekly if possible, to gain a clearer understanding of the effectiveness of the actions taken.			✓	✓	At these levels of drought more data will be required.
Maintaining dialogue with the Incumbent Water company on its communications activities and their assessment of its effectiveness, and vice versa, so that any findings are shared.	✓				This will be done as drought develops.

Evaluating the cost of introducing certain measures.		✓	✓		The impact of the TUB and NEUB will be assessed.
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Table 8 – Effectiveness Measures

Monitoring the effectiveness of our communications will also be a standing agenda item on our DMGs as will tracking the activities in the Table.

The outcomes from the measures in the communication monitoring plan will inform our approach to communications for future droughts and provide information for our post drought review, which is covered in Section 6 of this plan.

5. Relevant Legislation

5.1 Relevant Stakeholders & Legislation

ESP Water is a statutory water and sewerage undertaker and for appointed areas in England, the relevant consultees regarding applications for drought actions will be Defra and the Environment Agency. We also consult with all the incumbents we take a supply of water from, and other regulators as required by the appropriate legislation.

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

5.2 Codes of Practice and Compensation

Our published Customer Codes of Practice sets out our commitment to customers and may be found at www.espwater.co.uk/households/customer-commitment/. If there were to be a Level 4 situation which resulted in water supplies to customers being cut off, we guarantee to make a payment of £15 to each customer for each day (or equivalent to the incumbent), or part of each day, that they are without water. The maximum compensation we will pay out is equal to the Incumbent water company's average household bill for the previous year for a given area. As a minimum, we will mirror the incumbent company as to the amount a business customer will receive per day. The maximum is the amount of water charges payable by the customer for the premises for the previous charging year.

5.3 Legislation relating to TUBs

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

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

5.4 Legislation relating to Ordinary (NEUBs) and Emergency Drought Orders

The Water Resources Act 1991, as amended by the Environment Act 1995 and the Water Act 2003, allows for three legislative ways for dealing with drought situations: drought permits, ordinary drought orders and emergency drought orders. ESP Water does not have its own water sources and will not make an application for a drought permit.

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

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

5.5 Strategic Environmental Assessment (SEA)

A SEA is designed to:

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

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

6. Recovering from Drought

6.1 Assessing a return to normal conditions

As part of our ongoing review of the water supply situation and our regular dialogue with the incumbent water company, we will monitor the water resources position within the relevant Water Resource Zone (WRZ). Triggers for de-escalation will be agreed and discussed at our DMGs. Regular communication should ensure that we know the timelines for drought recovery.

Only when the incumbent has determined that resource levels and expected weather conditions have improved, will we meet with the incumbent to consider whether the water resources position has returned to normal conditions. At this point, we will communicate this recovery to normal conditions to regulators, stakeholders, and our customers. Once the lessons learned have been obtained, no later than six months from de-escalation, the DMG will also be stood down.

6.2 Post Drought Review Actions

Once a return to normal conditions has been confirmed for a given area, a review covering all our sites affected within the relevant area will be carried out and the lessons learned during the drought event will be identified. This may identify any changes or improvements that may be required for future drought events. We will engage with the incumbent water company and the relevant bodies in England and will prepare a lesson learned report and recommendations within six months of the ending of drought measures which will be submitted to our Board. Our Drought Plan will be updated as necessary as part of the agreed programme of work.

Our lessons learned document will be published on our website. This will also be shared with our customers and other stakeholders and regulators via a workshop or meeting to gather any feedback and further learning. An action plan for the development of the lessons learned report and workshop will be managed by the DMG to keep to timescales.

7. Appendix 1 - Our Sites

This draft of our Drought Plan is valid from 01 January 2024 and therefore Table 8 and 9 and the subsequent sections contain detail on our first 31 sites since we were appointed in July 2022. However, as our portfolio of sites is increasing, we will periodically add new sites to this Appendix. Also, the build out for some of our new developments may be several years so the numbers of customers in each site will grow over time.

Table 9 – Our Sites as of 01 January 2024

No.	Development	Incumbent Water Company
1	Merchant’s Wharf, Salford	United Utilities
2	Bridgewater Wharf, Salford	United Utilities
3	Bhailok Court, Preston	United Utilities
4	Varsity Quarter, Northenden	United Utilities
5	Sydney Road, Crewe	United Utilities
6	Southport Road, Thornton	United Utilities
7	Trafford Waters, Manchester	United Utilities
8	Latitude Purple, Leeds	Yorkshire Water
9	Sylvester Street, Sheffield	Yorkshire Water
10	Halifax Road, Penistone	Yorkshire Water
11	Springwell Gardens, Leeds	Yorkshire Water
12	Latitude Blue, Leeds	Yorkshire Water
13	Back Lane, Sowerby	Yorkshire Water
14	Burdon Lane, Sunderland	Northumbrian Water
15	Bracks Farm, Bishops Auckland	Northumbrian Water
16	The Grange, Bideford	South West Water
17	West Carclaze Garden Village	South West Water
18	Wrottesley Park, Perton	Severn Trent Water
19	Station Road, Newport	Severn Trent Water
20	Bromyard Road, Worcester	Severn Trent Water
21	Whitford Road, Bromsgrove	Severn Trent Water
22	New Garden Square, Birmingham	Severn Trent Water
23	Coventry Meggitt, Coventry	Severn Trent Water
24	Fairham Pastures, Nottingham	Severn Trent Water
25	Malabar Farm, Daventry	Anglian Water
26	Kennett Garden Village, Newmarket	Anglian Water
27	Glatton Road (Phase 1), Sawtry	Anglian Water
28	Loves Farm, St Neots	Anglian Water
29	The Maltings, Haddenham	Thames Water
30	Hampden Fields, Aylesbury	Thames Water
31	Harvino, Hunnington	South Staffs Water

A map (Figure 6) showing the locations of our current sites is below:

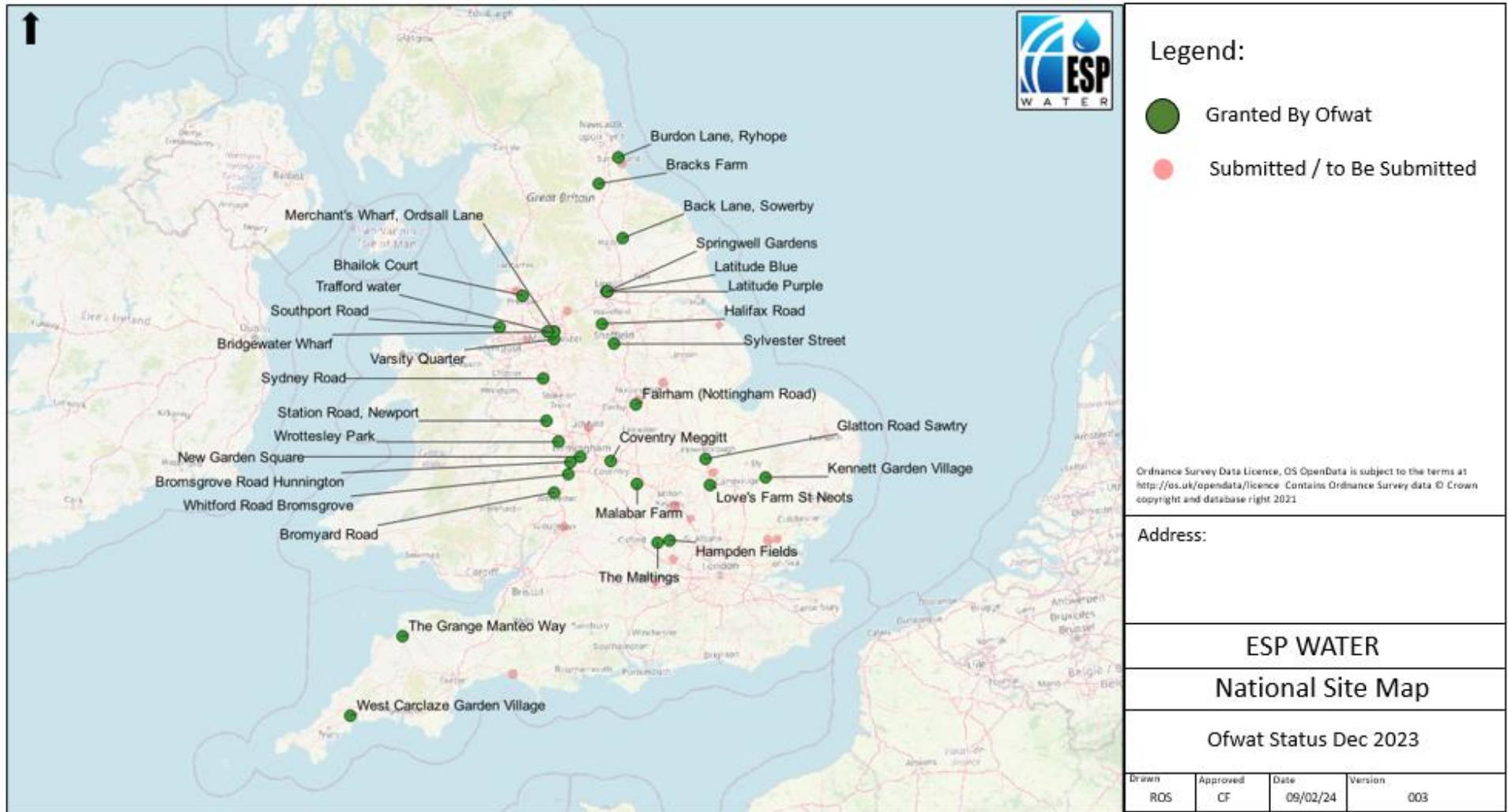


Figure 6 - Our sites

Table 9 below summarises the trigger levels and actions according to the Incumbent we get our supply from. We will match these levels of service. It includes likely requirements for specific measures at Level 2, 3 and 4 by representing the number of times this measure is implemented in a certain period or the annual chance of it happening. For example, 1 in 100 years or 1% chance. We have bulk supply agreements in place with the relevant Incumbent for all these sites. Links to the various Incumbent’s Drought Plans can be found in each subsequent incumbent section.

Table 8 and 9 will be updated as soon as is reasonably practical and at least annually after a variation has been granted by Ofwat and the network adopted by ESP Water.

Table 10 – Our sites and relationships with the Incumbents

Site	ESPW Resource Zone	Incumbent	Incumbent Water Resource Zone	Likely requirement based upon Incumbent experience		
				Level 2 – TUB	Level 3 - NEUB	Level 4 - Rota Cuts, Standpipes
Merchant’s Wharf, Salford	UU Strategic	United Utilities	Strategic	1 in 20 years or <5%	1 in 80 years or <1.25%	1 in 200 years or <0.5%
Bridgewater Wharf, Salford	UU Strategic	United Utilities	Strategic	1 in 20 years or <5%	1 in 80 years or <1.25%	1 in 200 years or <0.5%
Bhailok Court, Preston	UU Strategic	United Utilities	Strategic	1 in 20 years or <5%	1 in 80 years or <1.25%	1 in 200 years or <0.5%
Varsity Quarter, Northenden	UU Strategic	United Utilities	Strategic	1 in 20 years or <5%	1 in 80 years or <1.25%	1 in 200 years or <0.5%
Sydney Road, Crewe	UU Strategic	United Utilities	Strategic	1 in 20 years or <5%	1 in 80 years or <1.25%	1 in 200 years or <0.5%
Southport Road, Thornton	UU Strategic	United Utilities	Strategic	1 in 20 years or <5%	1 in 80 years or <1.25%	1 in 200 years or <0.5%
Trafford Waters, Manchester	UU Strategic	United Utilities	Strategic	1 in 20 years or <5%	1 in 80 years or <1.25%	1 in 200 years or <0.5%
Latitude Purple, Leeds	YW Grid	Yorkshire Water	Grid	1 in 25 years	1 in 80 years	1 in >500 years
Sylvester Street, Sheffield	YW Grid	Yorkshire Water	Grid	1 in 25 years	1 in 80 years	1 in >500 years
Halifax Road, Penistone	YW Grid	Yorkshire Water	Grid	1 in 25 years	1 in 80 years	1 in >500 years

Springwell Gardens, Leeds	YW Grid	Yorkshire Water	Grid	1 in 25 years	1 in 80 years	1 in >500 years
Latitude Blue, Leeds	YW Grid	Yorkshire Water	Grid	1 in 25 years	1 in 80 years	1 in >500 years
Back Lane, Sowerby	YW Grid	Yorkshire Water	Grid	1 in 25 years	1 in 80 years	1 in >500 years
Burdon Lane, Sunderland	NW Kielder	Northumbrian Water	Kielder	1 in 150 years	1 in 200 years	1 in 500 years
Bracks Farm, Bishops Auckland	NW Kielder	Northumbrian Water	Kielder	1 in 150 years	1 in 200 years	1 in 500 years
The Grange, Bideford	SWW Roadford	South West Water	Roadford	1 in 20 years	1 in 40 years	Unacceptable
West Carclaze Garden Village. St Austell	SWW Colliford	South West Water	Colliford	1 in 20 years	1 in 40 years	Unacceptable
Wrottesley Park, Perton	STW Shelton	Severn Trent Water	Shelton	Not more than 3 in 100 years	Not more than 3 in 100 years	Unacceptable
Station Road, Newport	STW Shelton	Severn Trent Water	Shelton	Not more than 3 in 100 years	Not more than 3 in 100 years	Unacceptable
Bromyard Road, Worcester	STW Strategic Grid	Severn Trent Water	Strategic Grid	Not more than 3 in 100 years	Not more than 3 in 100 years	Unacceptable
Whitford Road, Bromsgrove	STW Strategic Grid	Severn Trent Water	Strategic Grid	Not more than 3 in 100 years	Not more than 3 in 100 years	Unacceptable
New Garden Square, Birmingham	STW Strategic Grid	Severn Trent Water	Strategic Grid	Not more than 3 in 100 years	Not more than 3 in 100 years	Unacceptable
Coventry Meggitt, Coventry	STW Strategic Grid	Severn Trent Water	Strategic Grid	Not more than 3 in 100 years	Not more than 3 in 100 years	Unacceptable
Fairham Pastures, Nottingham	STW Nottinghamshire	Severn Trent Water	Nottinghamshire	Not more than 3 in 100 years	Not more than 3 in 100 years	Unacceptable
Malabar Farm, Daventry	AW Ruthamford North	Anglian Water	Ruthamford North	1 in 10 years	1 in 40 years	1 in 100 and 1 in 200 after 2025
Kennett Garden Village, Newmarket	AW Newmarket	Anglian Water	Newmarket	1 in 10 years	1 in 40 years	1 in 100 and 1 in 200 after 2025
Glatton Road (Phase 1), Sawtry	AW Ruthamford North	Anglian Water	Ruthamford North	1 in 10 years	1 in 40 years	1 in 100 and 1 in 200 after 2025

Loves Farm, St Neots	AW Ruthamford South	Anglian Water	Ruthamford South	1 in 10 years	1 in 40 years	1 in 100 and 1 in 200 after 2025
The Maltings, Haddenham	TW SWA	Thames Water	Slough, Wycombe, Aylesbury	1 in 10 years	1 in 20 years	Never or 1 in 100 years
Hampden Fields, Aylesbury	TW SWA	Thames Water	Slough, Wycombe, Aylesbury	1 in 10 years	1 in 20 years	Never or 1 in 100 years
Harvino, Hunnington	South Staffs WRZ	South Staffs Water	South Staffs WRZ	1 in 40 years	1 in 80 years	Emergency plan

7.1 United Utilities Area

All of sites in the United Utilities (UU) Area are supplied from the Strategic Resource Zone, which is the largest WRZ in the UU area. If UU were to hit one of their triggers, then ESPW will implement the same measures. Their Drought Plan includes how they will engage with stakeholders, like us in a Drought situation and lists the actions they will take. See the link below:

United Utilities

www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/drought-plan/

As explained in Section 3.4 and 3.5 of this plan, if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each site below.

7.1.1 Merchant's Wharf & Bridgewater Wharf, Salford

These two sites are variations situated within the United Utilities area. They consist of two high rise residential buildings, with a small number of non-household (NHH) customers in the centre of Salford. We have bulk supply agreements with United Utilities to supply water and a bulk discharge agreement to take the wastewater away. Bridgewater Wharf is water only.

Local Newspaper: Manchester Evening News or Salford Now
<https://www.manchestereveningnews.co.uk/> or <https://www.salfordnow.co.uk/>

7.1.2 Bhailok Court, Preston

This residential site in Preston is also within the United Utilities area and we have a bulk supply and bulk discharge agreement with this Incumbent. There are a small number of NHH customers on this site.

Local Newspaper: Lancashire Post or Lancashire Live
<https://www.lep.co.uk/news/latest> or <https://www.lancs.live/all-about/preston>

7.1.3 Varsity Quarter, Manchester

This residential site is situated in Manchester within the United Utilities area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are no NHH customers on this site.

Local Newspaper: Manchester Evening News or In touch Manchester
<https://www.manchestereveningnews.co.uk/> or <https://www.intouchwythenshawe.co.uk/news>

7.1.4 Sydney Road, Crewe

This residential site is situated in Crewe within the United Utilities area and consequently we have a bulk supply agreement with this Incumbent, which is a water only site. There are no NHH customers on this site.

Local Newspaper: Cheshire Live or Crewe Nub News
<https://www.cheshire-live.co.uk/all-about/crewe> or <https://crewe.nub.news/>

7.1.5 Southport Road, Thornton

This residential site is situated in Thornton, near Liverpool within the United Utilities area and consequently we have a bulk supply agreement with this Incumbent, which is a water only site. There are no NHH customers on this site.

Local Newspaper: Gazette & Herald or Lancashire Live <https://www.gazetteherald.co.uk/local-news/thornton-news/> or <https://www.lancs.live/>

7.1.6 Trafford Waters, Manchester

This is a large development is situated near Manchester within the United Utilities area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are around 40 NHH commercial units on this site, which is near the Trafford Waters shopping centre.

Local Newspaper: Manchester Evening News or Messenger Newspapers <https://www.manchestereveningnews.co.uk/> or <https://www.messengernewspapers.co.uk/local-news/trafford-news/>

7.2 Yorkshire Water Area

All of sites in the Yorkshire Water (YW) Area are supplied from the Gird Resource Zone, which is the largest WRZ in the YW area. A link to their Drought Plan is below:

Yorkshire Water

www.yorkshirewater.com/about-us/resources/drought-plan/

As explained in Section 3.4 and 3.5 of this plan, if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each site below.

7.2.1 Latitude Purple, Latitude Blue & Springwell Gardens, Leeds

These three sites are variations situated within the Yorkshire Water area. They consist of three high rise residential buildings in the centre of Leeds. We have bulk supply agreements with Yorkshire Water to supply them with water and bulk discharge agreements to take the wastewater away. There will be a small number of NHH customers on these sites.

Local Newspaper: Leeds Live or Yorkshire Evening Post

<https://www.leeds-live.co.uk/> or <https://www.yorkshireeveningpost.co.uk/topic/leeds>

7.2.2 Halifax Road, Penistone

This residential site is situated in Penistone within the Yorkshire Water area and consequently we have a bulk supply agreement with this Incumbent. This is a water only site for ESPW and there are no NHH customers.

Local Newspaper: The Star or Barnsley Chronicle

<https://www.thestar.co.uk/news> or <https://www.barnsleychronicle.com/>

7.2.3 Sylvester Street, Sheffield

This site is situated in Sheffield within the Yorkshire Water area and consequently we have a bulk supply agreement with this Incumbent. It consists of three blocks of flats and there will be one NHH consumer.

Local Newspaper: The Star or Mercury Newspaper

<https://www.thestar.co.uk/news> or <https://www.mercurynewspaper.co.uk/>

7.2.4 Back Lane, Sowerby

This residential site is situated in Sowerby within the Yorkshire Water area and consequently we have a bulk supply agreement with this Incumbent. This is a water only site and there are no NHH consumers.

Local Newspaper: Thirsk Weekly News & Darlington and Stockton Times

<https://thirskweeklynews.com/> or <https://www.darlingtonandstocktontimes.co.uk/>

7.3 Northumbrian Water Area

All of sites in the Northumbrian Water (NW) Area are supplied from the Kielder Resource Zone, which is the largest WRZ in the NW area. Northumbrian Water will set up a Drought Management Group, of which we will be one of their external stakeholders. Their Drought plan includes their process for issuing a TUB and list all the exceptions to any restrictions, which we will follow should there be an impact to our sites.

Northumbrian Water

www.nwg.co.uk/droughtplan

As explained in Section 3.4 and 3.5 of this plan, if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each site below.

7.3.1 Burdon Lane, Sunderland

This residential site is situated near Sunderland within the Northumbrian Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are a small number of NHH customers on this site.

Local Newspaper: Sunderland Echo and the Northern Echo
<https://www.sunderlandecho.com/> or <https://www.thenorthernecho.co.uk/local-news/sunderland-news/>

7.3.2 Bracks Farm, Bishop Auckland

This residential site is situated in Bishops Auckland within the Northumbrian Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are no NHH customers on this site.

Local Newspaper: Chronicle Live and the Northern Echo
<https://www.chroniclelive.co.uk/all-about/bishop-auckland> or <https://www.chroniclelive.co.uk/>

7.4 South West Water Area

These sites in the South West Water (SWW) Area are supplied from the Roadford Resource Zone and the Colliford Resource Zone, which are two of 4 WRZ's in the SWW area. A link to their Drought plan is below and we will be one of their external stakeholders. In 2023, both sites had a TUB in place.

South West Water

www.southwestwater.co.uk/environment/water-resources/drought-plan/

As explained in Section 3.4 and 3.5 of this plan, if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each site below.

7.4.1 The Grange, Bideford

This residential site is situated in Bideford, within the South West Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are no NHH customers on this site.

Local Newspaper: North Devon Gazette and Devon Live

<https://www.northdevongazette.co.uk/> or <https://www.devonlive.com/all-about/north-devon>

7.4.2 West Carclaze, St Austell

This large residential site is situated in St Austell within the South West Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are up to twenty NHH customers on this site.

Local Newspaper: The Cornish Times and The Voice

<https://www.cornish-times.co.uk/your-area/st-austell-voice> or
<https://www.voicenewspapers.co.uk/>

7.5 Severn Trent Water Area

Two of the sites (Wrottesley Park and Station Road), in the Severn Trent Water (STW) Area are supplied from the Shelton Resource Zone, which is one of several WRZs in the STW area. Fairham Pastures is supplied from the Nottinghamshire WRZ and the other four are supplied from the Strategic Grid WRZ. A link to STW's Drought Plan, which includes information on their plans for restrictions and how they will communicate with their stakeholders is below.

Severn Trent Water

www.stwater.co.uk/about-us/our-other-plans/drought-plan/

As explained in Section 3.4 and 3.5 of this plan, if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each site below.

7.5.1 Wrottesley Park, Perton

This residential site is situated in Perton near Wolverhampton within the Severn Trent Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are no NHH customers on this site.

Local Newspaper: Express and Star and Shropshire Star
<https://www.expressandstar.com/news/local-hubs/wolverhampton/> or
<https://www.shropshirestar.com/>

7.5.2 Station Road, Newport

This residential site is situated in Newport near Worcester within the Severn Trent Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are currently no NHH customers on this site.

Local Newspaper: All about Newport and Shropshire Star
<https://www.allaboutnewport.co.uk/newport-shropshire-news/> or
<https://www.shropshirestar.com/>

7.5.3 Bromyard Road, Worcester

This residential site is situated in Worcester within the Severn Trent Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are no NHH customers on this site.

Local Newspaper: Worcester News and Berrow's Worcester Journal
<https://www.worcesternews.co.uk/> or [Berrow's Worcester Journal](#)

7.5.4 Whitford Road, Bromsgrove

This residential site is situated in Bromsgrove within the Severn Trent Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are no NHH customers on this site.

Local Newspaper: Bromsgrove Standard and Bromsgrove Advertiser
<https://bromsgrovestandard.co.uk/> or <https://www.bromsgroveadvertiser.co.uk/news/>

7.5.5 New Garden Square, Birmingham

This site is situated in Birmingham within the Severn Trent Water area and consequently we have a bulk supply agreement with this Incumbent. It consists of three blocks of flats and there will be two NHH consumer.

Local Newspaper: Express and Star and Birmingham Live
<https://www.expressandstar.com/news/local-hubs/birmingham/> or
<https://www.birminghammail.co.uk/news/midlands-news/>

7.5.6 Coventry Meggitt, Coventry

This residential site is situated in Coventry within the Severn Trent Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are no NHH properties.

Local Newspaper: The Coventry Observer or Coventry Live
<https://www.coventryobserver.co.uk/> or <https://www.coventrytelegraph.net/>

7.5.7 Fairham Pastures, Nottingham

This residential site is situated near Nottingham within the Severn Trent Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are two NHH consumer and a school.

Local Newspaper: Nottingham Post or Keyworth News
<https://www.nottinghampost.com/> or <https://www.keyworthnews.com/>

7.6 Anglian Water Area

Three of the sites in the Anglian Water (AW) Area are supplied from the Ruthamford North WRZ, which is one of several WRZs in the AW area. Loves Farm is supplied from Ruthamford South WRZ and Kennett Garden Village is supplied from the Newmarket WRZ. A link to AW's Drought Plan, which includes information on their plans for restrictions and how they will communicate with their stakeholders is below.

Anglian Water

<https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drought-plan/>

As explained in Section 3.4 and 3.5 of this plan, if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each site below.

7.6.1 Malabar Farm, Daventry

This large residential site is situated in Daventry within the Anglian Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are 10 NHH customers on this site.

Local Newspaper: Daventry Express and Northampton Chronicle and Echo
<https://www.daventryexpress.co.uk/> or <https://www.northamptonchron.co.uk/topic/daventry>

7.6.2 Kennett Garden Village, Newmarket

This residential site is situated in Newmarket within the Anglian Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are 8 NHH customers on this site including a school.

Local Newspaper: Suffolk News and Cambridge News
<https://www.suffolknews.co.uk/newmarket/> or <https://www.cambridge-news.co.uk/all-about/newmarket>

7.6.3 Glatton Road (Phase 1), Sawtry

This residential site is situated in Sawtry within the Anglian Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There is only 1 NHH customer on this site, which is a school.

Local Newspaper: The Hunts Post or Peterborough Telegraph
<https://www.huntspost.co.uk/local-news/sawtry-news/> or
<https://www.peterboroughtoday.co.uk/>

7.6.4 Loves Farm, St Neots

This residential site is situated in St Neots within the Anglian Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are 6 NHH customers on this site.

Local Newspaper: The Hunts Post and Cambridge News
<https://www.huntspost.co.uk/> or <https://www.cambridge-news.co.uk/all-about/st-neots>

7.7 Thames Water Area

The two sites in the Thames Water (TW) Area are supplied from the Slough, Wycombe, Aylesbury (SWA) WRZ, which is one of several WRZs in the TW area. A link to TW's Drought Plan, which includes information on their plans for restrictions and how they will communicate with their stakeholders is below.

Thames Water

<https://www.thameswater.co.uk/about-us/regulation/drought-plan>

As explained in Section 3.4 and 3.5 of this plan, if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each site below.

7.7.1 The Maltings, Haddenham

This residential site is situated in Haddenham within the Thames Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are no NHH customers on this site.

Local Newspaper: Bucks Free Press and Haddenham.Net
<https://www.bucksfreepress.co.uk/> or <https://www.haddenham.net/>

7.7.2 Hampden Fields, Aylesford

This residential site is situated in Aylesford within the Thames Water area and consequently we have a bulk supply and bulk discharge agreement with this Incumbent. There are around 14 NHH customers on this site.

Local Newspaper: Bucks Free Press and Herts Advertiser
<https://www.bucksfreepress.co.uk/> or <https://www.hertsad.co.uk/>

7.8 South Staffs Water Area

The one site in the South Staffs Water (SSW) Area is supplied from the South Staffs WRZ, as the company only has 1 resource zone supplied by surface and groundwater. A link to SSW's Drought Plan, which includes information on their plans for restrictions and how they will communicate with their stakeholders is below. As South Staffs Water is a water only company the sewerage is managed by Severn Trent Water.

South Staffs Water

<https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-drought-plan>

As explained in Section 3.4 and 3.5 of this plan, if we need to issue a TUB or NEUB we need to advertise in two local newspapers. A newspaper suggestion is included for each site below.

7.8.1 Harvino, Hunnington

This residential site is situated in Bromsgrove Road, Hunnington within the South Staffs Water area and consequently we have a bulk supply agreement with this Incumbent. We also have a bulk discharge agreement with Severn Trent Water for wastewater. There are no NHH customers on this site.

Local Newspaper: Halesowen News and Express and Star

<https://www.halesowennews.co.uk/> or <https://www.expressandstar.com/news/local-hubs/dudley/halesowen/>

Appendix 2 – An example of a customer letter for Level 1.

Water Efficiency

Dear Customer

As you may be aware, the area in which you live is experiencing increased stress on its water resources. As your water supplier, we are writing to you to request your help in saving water by taking some voluntary measures.

Below we've included some water saving tips that will not only help conserve supplies but will also help the environment (and save you money!).

In the home:

Inside

- When using your washing machine, wait until you have a full load.
- Do the same with your dishwasher if you have one.
- If you wash dishes by hand, use the sink or a bowl, not a running tap.
- When washing fruit and vegetables, use a bowl and keep the water for watering plants.
- Don't run the tap while brushing your teeth – this could save around 9 litres per minute.
- Take a shower, rather than a bath and reduce the time you spend in the shower. Every minute less could be 15 litres or more saved.

Outside

- If you have a garden, consider using bath or shower water for watering your plants. You can find more information about doing this online.
- Water the garden with a watering can rather than a hose – a hose can use up to 1000 litres per hour.
- When watering, do it at dawn or in the evening, reducing water lost to evaporation.
- If you have a car, consider washing only the parts that keep you safe, like the windows, mirrors and lights.

You can find more information online, at: <https://www.waterwise.org.uk/save-water/> and on our website www.espug.com

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

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

This table confirms which matters to be addressed in a Drought Plan according to Drought Plan (England) Direction 2020 are applicable to us as a NAV and whether a response is included in this document.

Matter – 3 (1) a-j	Section or not applicable?
a) how the water undertaker’s management structure will manage, communicate and make decisions when using its drought plan;	This is included in Section 4 and was enhanced following feedback on our draft from Defra.
b) the drought management measures that a water undertaker expects to take to maintain supply for the onset, duration and abatement of all potential droughts covered by its plan;	An assessment of drought measures is given in Section 3 and 4.
c) how the sequencing of measures has been designed to limit impacts on customers and the environment;	This is also included in Section 3.
d) the magnitude and duration of the drought scenarios against which the drought plan has been tested to provide security of supply;	We don’t have our own water resources and are therefore reliant on the drought scenarios undertaken by the incumbents and consequently, we are communicating with them with regards our Drought Plan. When developing our plan, we have referred to the drought scenarios that the incumbents have included in their plans and made our own assessment. This is referred to in Section 2 and within our WRMP.
(e) the permits, orders and any other authorisations that the water undertaker expects to need in order to implement the drought management measures in its drought plan including mitigation and prevention measures;	This is included in Section 3 and 4.
(f) any pre-application steps agreed to ensure that the water undertaker is able to make any necessary applications in a timely manner to those bodies responsible for granting permits, orders and any other authorisations during the onset, duration and abatement of all droughts covered by its drought plan;	The Incumbent’s will make any applications to responsible parties for drought permits but we will ensure we make applications for an ordinary or emergency drought order in a timely manner. This is covered in Section 3,4 and 6.
(g) the measures that will be used to monitor, prevent and mitigate any adverse effect on the environment resulting from the implementation of drought management measures;	All measures employed will consider environmental considerations. This is covered in Section 3 and 4.
(h) the compensation payments that a water undertaker expects to make as a result of the implementation of a drought management measure;	This is included in Section 6 and is in our Customer Code of Practice.
(i) how a water undertaker will review the ongoing effectiveness of its drought plan and act on its review;	This is included in Section 4.
(j) how the drought plan is consistent with the water undertaker’s Water Resources Management Plan and any voluntary steps that	We have included information in Section 1 explaining how the two documents are linked and the stage we are at with regards our draft WRMP.

will be taken to collaborate regionally on drought management measures.	
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8. Document Control

This document will be reviewed at least annually.

Version history				
Version	Date	Author	Reason for new version	Sections affected
0.01	27/01/23	Catherine Fearon	First draft	N/A
0.02	24/04/23	Catherine Fearon	Updated for consultation	Updated consultation details and mention of drought scenarios.
0.03	04/08/23	Catherine Fearon	Updated for Statement of Response (SOR)	As detailed in SOR
1.0	09/02/24	Catherine Fearon	Final Drought Plan	Various sections

Approval - Signed:



Stephen Morris

Water Managing Director, ESP Water Limited

Date: 09 February 2024