

Draft

# Final Drought Plan

2022

## Appendix I: Water Resources West



# 1 Introduction

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United Utilities is an active member of the regional group Water Resources West (WRW). WRW is a group of abstractors, their representatives and their regulators. We are working together to ensure the sustainability of water resources, considering wider societal needs, environmental improvement and working across sectors. Unlike some of the other regional groups (i.e. Water Resources South East and Water Resources East), WRW was established relatively recently, in 2018. Despite this we have made significant progress on collaborative drought planning and we expect a further step change following the completion of our first regional water resources plan in 2023. More information about WRW can be found at the website<sup>1</sup>.

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<sup>1</sup> <https://waterresourceswest.co.uk/>

# 2 Regional drought planning guidance

There are now a number of government requirements and expectations relating to regional aspects of drought planning and management. As a group, WRW agreed to work together to meet these requirements. Table 1 outlines specifically how they have been incorporated into and/or influenced our own drought plan.

Table 1 Outlines the requirements of the regional planning group and how they have been met

Driver	Requirement	How we have covered this in our plan
<b>Drought Plan (England) Direction 2020</b>	“a water undertaker must address in its Drought Plan any voluntary steps that will be taken to collaborate regionally on drought management measures”	<p>All members of WRW have taken a number of voluntary steps to collaborate regionally, for example:</p> <ul style="list-style-type: none"> <li>• Mutual aid</li> <li>• Code of practice on water use restrictions</li> <li>• Temporary use ban notice</li> </ul> <p>More information is provided in Section 3.</p> <p>In addition we have implemented a range of new measures to improve drought management across our region, as outlined in the following rows of this table.</p> <p>In the regional water resources planning process we will continue to explore further ways to collaborate on drought management measures and feed these into our future drought plans as appropriate.</p>
<b>Government’s expectations for drought planning, letter to Water Company CEOs in England from Sophie Broadfield, Deputy Director – Water Services, Defra, 6 April 2020</b>	“Your new drought plans should demonstrate the wider role you will play in securing water supplies across your region.”	<p>For the regional plan we are conducting a joined-up options appraisal process to identify new sources of water across the region, as well as new demand reduction measures that could be taken. Where these options relate to potential drought plan actions they will be incorporated into our future drought plans. For this drought plan we have liaised closely with 3<sup>rd</sup> parties with whom we share supplies. This is covered in Section 2.6 of the main drought plan document.</p>
	“Your plan should show how your plan is consistent with relevant regional water resources plans and the expectations of the National Framework for water resources planning.”	<p>Through our work on developing a regional plan and consistent Water Resources Management Plans (WRMPs), the water company members of WRW are adopting consistent data, assumptions and planning techniques. This includes, for example, consistent assumptions on the import and export of water between companies. Where appropriate, we have also used these consistent data and assumptions for our drought plans.</p> <p>WRW has established working groups for the shared catchments to progress evidence sharing and common datasets. These groups will continue to support the water companies in their management of water resources in a joined-up way throughout the period covered by this drought plan. We are fully engaged with the National Framework, for example by providing hydrological data and water resources modelling outputs to the national modelling group.</p>

Driver	Requirement	How we have covered this in our plan
	<p>“You should seek to work collaboratively at a regional level, especially when imposing customer restrictions. In doing this we expect companies to categorise their drought plan measures using the Level 1 to 4 definitions and to be consistent in their language around temporary use bans and possible exemptions.”</p>	<p>Water company members of WRW have agreed to consistently adopt Level 1 to 4 definitions to categorise their drought actions. This represents a significant change from previous drought plans: companies will no longer refer to “drought triggers” or “drought zones” as they have done for a number of previous drought plans. It is designed to ensure that the drought plans are consistent and coherent to customers, stakeholders, governments, regulators and the media. These levels will be used to support consistent drought communications.</p> <p>Furthermore, the members of WRW will seek to align their drought communications wherever appropriate. WRW’s customer and stakeholder management group will support the members in the alignment of communications across WRW. However, it should be noted that WRW is a large and diverse area, with differing hydrological characteristics. Therefore, at any time in a drought event, different parts of the region may be at different levels of drought response.</p>
	<p>“We also expect you to learn from best practice and international examples to ensure your customer communications are highly effective and coordinated at a regional level.”</p>	<p>We are continually seeking to improve the effectiveness of our drought planning. In preparation for this drought plan we commissioned an independent consultancy to review our 2018 plan in the context of UK best practice and international examples. Drought planning and management practices in a range of different locations were explored but the following yielded the most useful information to help shape our plan:</p> <ul style="list-style-type: none"> <li>• Australia (Sydney)</li> <li>• South Africa</li> <li>• USA (Colorado)</li> <li>• Canada (British Columbia)</li> <li>• Hong Kong</li> </ul> <p>We actively search out other international examples as part of our general working practices, particularly where they relate to very severe droughts, the likes of which we have not experienced in our recorded history. For example, at a recent International Water Association conference we attended examples of emergency drought planning were provided from Sao Paulo, Brazil, and California. We used this information to help shape our policy around the timing of implementation of emergency customer restrictions and extreme pressure management.</p>

# 3 Regional collaborative working

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There several established initiatives where WRW is working closely together and we have summarised these in the following sections.

## 3.1 Mutual aid

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Water Company members of WRW participate in Water UK's Mutual Aid scheme. Mutual Aid is in place to facilitate inter-company borrowing of equipment or services to supplement each other's stocks during such incidents. This may be used, for example, to support water supplies by road tanker if necessary in a severe drought.

Water UK Council agreed that all member companies of the water industry should formally adopt a protocol to share the above with other member companies, to support the affected member company or companies during incidents, thereby enhancing the resilience and contingency options available to the industry as a whole. The protocol is set out in the Water UK Mutual Aid Manual.

Each member company agrees to provide support to companies in need due to an actual or potential incident affecting their ability to provide essential services if requested by another member unless they are simultaneously managing an incident of their own where such equipment or labour is required, or where there is a credible threat of a similar incident to that company.

The Mutual Aid Manual includes protocols for regional coordination. Severn Trent Water will act as the regional coordinating company for the West Coordination Zone. It is recommended that all inter-company assistance is administered under the protocols in the Water UK Mutual Aid Manual.

## 3.2 Code of Practice on Water Use Restrictions

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Water company members of WRW are all signatories to the Code of Practice on Water Use Restrictions.

WRW members cooperated with others in the industry to develop the code. The objective of the code is to have agreed common standards and approaches to restrictions and exceptions, consistent and coherent to customers, stakeholders, governments, regulators and the media. We have therefore signed up to the principles and practices set out in the code.

The Code of Practice provides guidance to water companies on the effective implementation of water use restrictions by way of Temporary Use Bans (TUBs) and Drought Orders (DO) to help manage demand during times of drought. The Code is designed to be used by water companies when they are updating their Drought Plans and when they are evaluating whether and how to implement water use restrictions during a drought.

All WRW water company members have therefore followed the code in preparing their drought plans and will also follow the code during a drought. WRW member companies will also carry out a joint review of exemptions to water use restrictions.

By doing this, when considering or implementing restrictions, we will be consistent and aligned as far as possible, so that our customers can be confident that their interests have been considered and they are not disadvantaged, or perceive a disadvantage, in comparison to customers in neighbouring water company areas.

### 3.3 Temporary Use Ban notice

In addition to following the Code of Practice on Water Use Restrictions, water company members of WRW have shared their experiences of recent dry weather events.

Based on these experiences, the WRW water company members adopt a consistent form of notice for Temporary Use Bans. The proposed form is as follows:

Water Industry Act 1991  
[Company name]

#### Temporary Ban on Water Use

[Company name] gives notice that, pursuant to sections 76 and 76A–C of the Water Industry Act 1991, the following uses of water supplied by [Company name] are restricted.

This notice, and further details concerning the prohibitions, current drought and water efficiency advice may be found on the website of the [Company name] here: [website address]

Water use restrictions will start on [date] at 0800 hours and continue until further notification. The restriction applies to [all] of the water resource zones defined in [Company name]'s statutory drought plan and as indicated on the map.

#### 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 [Company name] from a container through a hosepipe; and filling a container by means of a hosepipe with water supplied by [Company name];

- “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: [legislation.gov.uk/uksi/2010/2231/contents/made](https://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 [Company name] 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;
- 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.

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

### Discretionary Exceptions

Customers who meet the criteria below for a Discretionary Exception can continue to use water without having to make representation to [Company name] 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 Discretionary Exceptions include:

- Commercial customers that use hosepipes in the course of their day-to-day cleaning business operation as a service to customers to clean private motor vehicles, private leisure boats, walls and windows of domestic premises, patios, paths or artificial outdoor surfaces.
- Customers that hold who hold a Blue Badge or are registered on Priority Services Register of [Company name] and who have mobility issues but are not in possession of a blue badge may use a hosepipe to carry out the following activities;

- > Watering a garden attached to a domestic dwelling, or watering plants on domestic premises;
  - > Cleaning a private motor-vehicle;
  - > Watering plants on domestic or other non-commercial premises
  - > Filling or maintaining a domestic pond using a hosepipe
  - > Cleaning walls or windows of domestic premise;
  - > Cleaning paths or patios or other artificial outdoor surfaces,
- Cleaning a private leisure boat using a hosepipe in any of the following circumstances:
- > Where the boat is a primary residence,
  - > where fouling is causing increased fuel consumption,
  - > the engines are designed to be cleaned with a hosepipe

The following definition applies:

→ “Blue Badge” means a current valid Blue Badge issued by the relevant Local Authority.

## Representations

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Representations concerning any of these prohibitions may be made in writing at [email address]. To be considered representations must be received by [date] at 1700 hours. If, as a result of any representation, [Company name] decides to vary any terms of the prohibition, a further notice will be published. Subject to this, the prohibitions will have effect from the stated date and will remain in force until further notice. Any person who contravenes any of these prohibitions may be guilty of an offence, and liable, on summary conviction, to a fine not exceeding £1,000.

[Resource zone map]