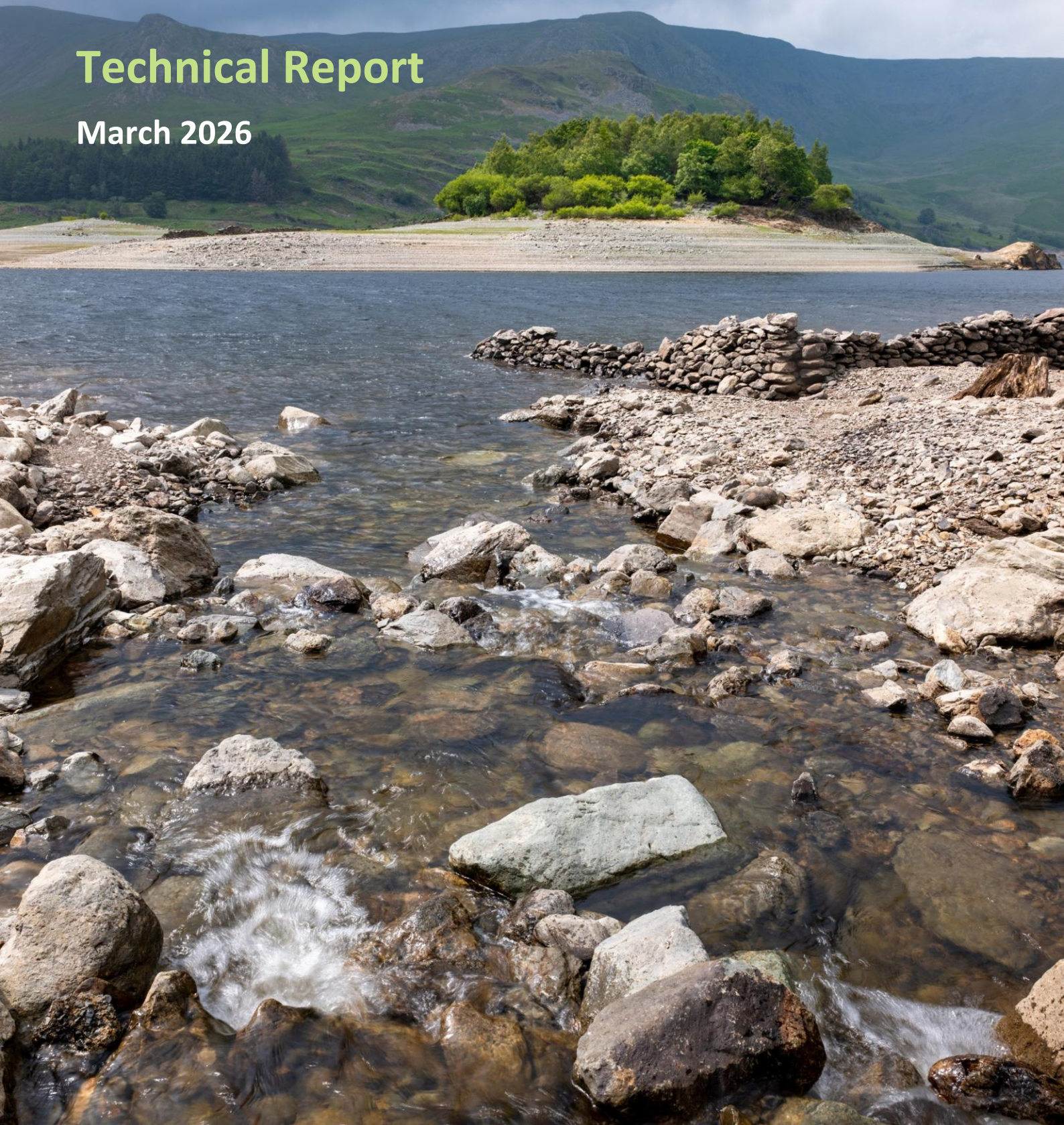


Draft Drought Plan 27

Demand actions

Technical Report

March 2026



Contents

- 1. Introduction..... 3**
 - 1.1 The role of demand actions3
 - 1.2 Overview of this document.....3
- 2. Overview of demand actions 5**
- 3. Leakage control and pressure management..... 13**
 - 3.1 Enhanced leakage13
 - 3.2 Pressure reduction14
- 4. Voluntary use restraint campaign 15**
- 5. Water use restrictions..... 17**
 - 5.1 Exceptions approach17
 - 5.2 Non-Essential use bans – Ordinary drought order.....32
 - 5.3 Emergency restrictions – emergency drought order38
 - 5.4 Compensation arrangements for drought measures38
- 6. Benefits of demand actions 39**
 - 6.1 Demand savings from enhanced leakage42
 - 6.2 Demand savings from pressure management42
 - 6.3 Demand savings from voluntary water use restraint43
 - 6.4 Demand savings from temporary use bans43
 - 6.5 Demand savings from non-essential use bans.....44
 - 6.6 Measuring the effectiveness of demand actions.....44
- 7. Implementation timetable..... 46**
- 8. Demand actions..... 48**

Appendices

- Appendix A Example draft document of a formal TUB Notice..... 54**

1. Introduction

This technical report outlines the demand actions that may be implemented during a drought event to manage demand for water. Our approach prioritises non-restrictive measures first, focusing on reducing demand without imposing limitations on customers. As a drought worsens, more restrictive demand actions may be phased in to ensure water security to protect customers and the environment.

1.1 The role of demand actions

Our focus on demand savings and water efficiency campaigns is designed to be always on, forming a continuous and proactive element of our demand management approach. During prolonged dry weather and drought conditions, we may be required to take further action to reduce demand beyond our always-on, business-as-usual (BAU) activity. These demand actions build on our BAU water efficiency programmes, strengthening everyday engagement with customers to promote sustained reductions in water use and enable us to manage constrained water resources more effectively.

Demand actions are intrinsically linked to our water resource position, serving as a critical component in managing water supply and demand during drought events. As the severity of drought increases, we intensify our demand actions. The primary goal of these actions is to reduce customer demand to align with available water resources and delay or avoid the need for more severe interventions.

By implementing these temporary measures early, we aim to reduce overall consumption, preserve water supplies, and minimise environmental impact. Demand actions are always prioritised before seeking additional abstraction from the environment through drought permits or orders.

Our demand actions follow a phased approach, starting with:

- Enhanced water efficiency promotion to encourage voluntary reductions in water use.
- Additional leakage control to accelerate repairs and minimise water loss.
- Targeted pressure reductions to optimise network efficiency without affecting customer supply.

If drought conditions persist or worsen, we will gradually introduce further measures, including temporary water use restrictions, to manage demand more effectively. These actions will be guided by our assessment of customer impact, regional water availability, and the overall resource position. They will be implemented early enough, and maintained for long enough, to ensure a measurable reduction in water demand.

1.2 Overview of this document

This document provides detailed information on the following areas:

- The phased implementation timetable of demand actions against the corresponding drought levels, including a summary and any restrictions to customers or associated permissions or constraints.
- The approach to implementing and revoking water use restrictions, such as temporary use ban and non-essential use bans, including compliance with relevant legalisation and any potential exceptions and concessions.
- The estimated seasonal demand savings, the methodology used to calculate them, and supporting evidence from literature and industry benchmarking.
- Monitoring and evaluation of demand actions to assess effectiveness and support continuous improvement in drought planning.

- Our standards of service policy, including details of any compensation arrangements.

Information on how we will co-ordinate with regulators, stakeholders including water retailers and New Appointments and Variations (NAVs) and customers to support the effective delivery of demand actions is documented in our 'Communication actions' technical report.

2. Overview of demand actions

The following section details the demand actions we may implement during drought by adopting a common phased approach, in line with regulatory guidance and the UK Water Industry Research Limited (UKWIR) Drought Code of Practice (CoP) (2023)¹.

During normal weather conditions we undertake several activities to optimise supply and demand as part of our day-to-day operations such as, delivering our leakage reduction programme. During dry weather, we also take early, proactive steps to reduce our own operational water use before any formal dry weather measures are introduced. This includes enhancing how we operate our network to reduce losses, adjusting internal processes to limit non-essential water use, and working closely with operational teams to ensure activity planning reflects emerging conditions.

Drought levels provide the most reliable indicators of water resource zone water availability and by monitoring these indicators closely, we can ensure that actions are implemented proportionately and at the most appropriate time to protect water resources while minimising disruption to customers. While demand actions are closely linked to our water resource position, other factors are also considered, including the effectiveness of demand actions and customer impact. During drought, we will introduce demand actions before seeking additional abstraction from the environment through drought permits or orders, in order to minimise the environmental impact.

A key part of managing demand is our communications approach, which focuses on engaging customers through agile, responsive messaging. By being agile in our communications, we can tailor activity by county and reservoir group, ensuring that messages are targeted, timely, and relevant. This allows us to connect with customers more effectively and influence behaviour by appealing to both their practical needs and their motivations, helping to reduce consumption before more restrictive measures are required.

Effective communication and engagement with customers, regulators, and stakeholders such as NAVs and water retailers is fundamental to implementing demand actions. We will ensure that information about any restrictions, and the reasons behind them, is delivered clearly, consistently, and at the right time to encourage public understanding and cooperation. Further details on the communication approach, including key messages, channels, and timing, are set out in our 'Communications actions' technical report.

¹ [UKWIR Drought Code of Practice \(2023\)](#)

We will take a phased approach to implementing temporary water use restrictions, such as temporary use bans, ensuring that measures are escalated only when necessary and in line with the prevailing drought conditions. Where temporary use bans or drought orders to impose non-essential use bans are introduced, both statutory and discretionary exceptions will apply to ensure that essential or justified water uses can continue. Details of these exceptions are provided in section 5. The geographical extent of any restrictions will be determined based on an assessment of the areas most at risk and the anticipated benefits of implementing water use restrictions within each area. The phased implementation of demand actions is summarised in Table 1.

Table 1: Summary of demand actions during normal operation and within each drought level

Status	Demand action	Summary	Restrictions to customers
Normal operation	'Business as usual' communications and leakage and demand reductions	'Always on' communications to promote our ongoing water efficiency programme to customers.	None
		Deliver our ongoing programme of leakage and demand reductions in line with our stretching ambitions.	
Enhanced monitoring and operations	Operational actions and water efficiency communications	Reduce operational water use	None
		Enhance water efficiency communications, highlighting the dry weather to promote and encourage voluntary demand reductions.	
Level 1: Increased risk from dry weather	Enhanced leak detection and repair	Company operational measure to accelerate finding and fixing leaks on the network.	None
	Water network pressure reduction phase 1	Company operational measure to lower pressure in the network to reduce leakage and bursts, managing flow to conserve water.	None
	Communication	Adapted communications to raise awareness of water resource situation and promote efficient use of water.	None
	Campaign for voluntary water use restraint	Company operational measure that encourages customers to reduce discretionary water use voluntarily (not legally enforceable). It focuses on public messaging (e.g. avoid hosepipes, shorter showers, delay car washing). It covers domestic and business users but relies entirely on cooperation. It is used in the early stages of drought, to encourage savings before legal restrictions.	None
Level 2: Drought	Water network pressure reduction phase 2	Company operational measure to lower pressure in the network to reduce leakage and bursts, managing flow to conserve water.	None
	Temporary use ban forecast	Forecast the timescale for requiring a temporary use ban	

Status	Demand action	Summary	Restrictions to customers
	Communication	Continue to deliver and promote communication campaigns to delay the introduction of a temporary use ban if possible	None
	Temporary use ban implementation	<p>Statutory restriction on domestic customers under Water Industry Act (WIA) (1991), section 76, as amended by Section 36 of the Flood and Water Management Act (FWMA) (2010). It prohibits specified non-essential uses, once notice is given to customers.</p> <p>To implement a temporary use ban we must be satisfied that we are “experiencing, or may experience, a serious shortage of water for distribution” and that voluntary water use restraints have not brought demand down sufficiently. In these circumstances we will consider implementing a temporary use ban within drought level 2 during the summer (April to September), to reduce external household demand. Our approach to applying a temporary use ban may be at the water resource zone (WRZ) level or on a more local basis, depending on the circumstances and operational requirements at the time and with the aim of introducing restrictions only where it is absolutely necessary.</p>	<p>The Water Use (Temporary Bans) Order (2010), which is the supplementary statutory instrument, defines the following eleven uses of water that will be restricted:</p> <ol style="list-style-type: none"> 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; and 11. Cleaning other artificial outdoor surfaces using a hosepipe <p>It is important to note that under the temporary use ban legislation, the term ‘garden’ is specifically defined.</p> <p>Statutory health or safety exceptions apply to some of the categories of water use, see section 5.1.2.</p>

Status	Demand action	Summary	Restrictions to customers
Level 3: Emergency planning	Water network pressure reduction phase 3	Company operational measure to lower pressure in the network to reduce leakage and bursts, managing flow to conserve water. It is not legally enforceable.	None
	Drought order to ban non-essential use	Statutory power under Water Resources Act (1991) and sections 73-81 and schedule 8 that extends restrictions to non-essential/commercial/industrial uses and can amend abstraction/discharge conditions.	The Drought Direction (2011), which is the supplementary statutory instrument, defines the range of 10 water use activities that may be prohibited with the successful application of a drought order: <ol style="list-style-type: none"> 1. Watering outdoor plants on commercial premises using a hosepipe; 2. Filling or maintaining a non-domestic swimming or paddling pool; 3. Filling or maintaining a pond; 4. Operating a mechanical vehicle-washer; 5. Cleaning any vehicle, boat, aircraft or railway rolling stock using a hosepipe; 6. Cleaning non-domestic premises using a hosepipe; 7. Cleaning a window of a non-domestic building using a hosepipe; 8. Cleaning industrial plant using a hosepipe; 9. Suppressing dust using a hosepipe; and 10. Operating a cistern in any building that is unoccupied and closed. Statutory health or safety exemptions apply to some of the categories of water use, see section 5.2.1.
Level 4: Emergency restrictions	Emergency drought order	The most severe power under WRA (1991) ⁴ , sections 73-81 and schedule 9, that restricts or prohibits any use of water, including essential domestic supply and enables emergency abstractions.	Last resort to conserve essential supplies by limiting domestic supplies and restricting industrial / commercial water use.

Table 1: Summary of demand actions during normal operation and within each drought level

Status	Demand action	Summary	Restrictions to customers
Normal operation	'Business as usual' communications and leakage and demand reductions	'Always on' communications to promote our ongoing water efficiency programme to customers.	None
		Deliver our ongoing programme of leakage and demand reductions in line with our stretching ambitions.	
Enhanced monitoring and operations	Operational actions and water efficiency communications	Reduce operational water use	None
		Enhance water efficiency communications, highlighting the dry weather to promote and encourage voluntary demand reductions. Preparation for enhanced leakage control activities, rezoning and pressure management	
Level 1: Increased risk from dry weather	Enhanced leak detection and repair	Company operational measure to accelerate finding and fixing leaks on the network.	None
	Water network pressure reduction phase 1	Company operational measure to lower pressure in the network to reduce leakage and bursts, managing flow to conserve water.	None
	Communication	Adapted communications to raise awareness of water resource situation and promote efficient use of water.	None
	Campaign for voluntary water use restraint	Company operational measure that encourages customers to reduce discretionary water use voluntarily (not legally enforceable). It focuses on public messaging (e.g. avoid hosepipes, shorter showers, delay car washing). It covers domestic and business users but relies entirely on cooperation. It is used in the early stages of drought, to encourage savings before legal restrictions.	None
Level 2: Drought	Water network pressure reduction phase 2	Company operational measure to lower pressure in the network to reduce leakage and bursts, managing flow to conserve water.	None
	Temporary use ban forecast	Forecast the timescale for requiring a temporary use ban	
	Communication	Continue to deliver and promote communication campaigns to delay the introduction of a temporary use ban if possible	None

Status	Demand action	Summary	Restrictions to customers
	<p>Temporary use ban implementation</p>	<p>Statutory restriction on domestic customers under Water Industry Act (WIA) (1991)², section 76, as amended by Section 36 of the Flood and Water Management Act (FWMA) (2010). It prohibits specified non-essential uses, once notice is given to customers.</p> <p>To implement a temporary use ban we must be satisfied that we are “experiencing, or may experience, a serious shortage of water for distribution” and that voluntary water use restraints have not brought demand down sufficiently. In these circumstances we will consider implementing a temporary use ban within drought level 2 during the summer (April to September), to reduce external household demand. Our approach to applying a temporary use ban may be at the water resource zone (WRZ) level or on a more local basis, depending on the circumstances and operational requirements at the time and with the aim of introducing restrictions only where it is absolutely necessary.</p>	<p>The Water Use (Temporary Bans) Order (2010)³, which is the supplementary statutory instrument, defines the following eleven uses of water that will be restricted:</p> <ol style="list-style-type: none"> 12. Watering a ‘garden’ using a hosepipe; 13. Cleaning a private motor vehicle using a hosepipe; 14. Watering plants on domestic or other non-commercial premises using a hosepipe; 15. Cleaning a private leisure boat using a hosepipe; 16. Filling or maintaining a domestic swimming or paddling pool; 17. Drawing water, using a hosepipe, for domestic recreational use; 18. Filling or maintaining a domestic pond using a hosepipe; 19. Filling or maintaining an ornamental fountain; 20. Cleaning walls, or windows, of domestic premises using a hosepipe; 21. Cleaning paths or patios using a hosepipe; and 22. Cleaning other artificial outdoor surfaces using a hosepipe <p>It is important to note that under the temporary use ban legislation, the term ‘garden’ is specifically defined.</p> <p>Statutory health or safety exceptions apply to some of the categories of water use, see section 5.1.2.</p>

² [Water Industry Act 1991](#)

³ [The Water Use \(Temporary Bans\) Order 2010](#)

Status	Demand action	Summary	Restrictions to customers
<p>Level 3: Emergency planning</p>	<p>Water network pressure reduction phase 3</p>	<p>Company operational measure to lower pressure in the network to reduce leakage and bursts, managing flow to conserve water. It is not legally enforceable.</p>	<p>None</p>
	<p>Drought order to ban non-essential use</p>	<p>Statutory power under Water Resources Act (1991)⁴ and sections 73-81 and schedule 8 that extends restrictions to non-essential/commercial/industrial uses and can amend abstraction/discharge conditions.</p>	<p>The Drought Direction (2011)⁵, which is the supplementary statutory instrument, defines the range of 10 water use activities that may be prohibited with the successful application of a drought order:</p> <ol style="list-style-type: none"> 11. Watering outdoor plants on commercial premises using a hosepipe; 12. Filling or maintaining a non-domestic swimming or paddling pool; 13. Filling or maintaining a pond; 14. Operating a mechanical vehicle-washer; 15. Cleaning any vehicle, boat, aircraft or railway rolling stock using a hosepipe; 16. Cleaning non-domestic premises using a hosepipe; 17. Cleaning a window of a non-domestic building using a hosepipe; 18. Cleaning industrial plant using a hosepipe; 19. Suppressing dust using a hosepipe; and 20. Operating a cistern in any building that is unoccupied and closed. <p>Statutory health or safety exemptions apply to some of the categories of water use, see section 5.2.1.</p>

⁴ [Water Resources Act 1991](#)

⁵ [The Drought Direction 2011 - GOV.UK](#)

Status	Demand action	Summary	Restrictions to customers
Level 4: Emergency restrictions	Emergency drought order	The most severe power under WRA (1991) ⁴ , sections 73-81 and schedule 9, that restricts or prohibits any use of water, including essential domestic supply and enables emergency abstractions.	Last resort to conserve essential supplies by limiting domestic supplies and restricting industrial / commercial water use.

3. Leakage control and pressure management

Upon reaching drought level 1, we will increase both leakage detection and repair activity, alongside implementing targeted pressure reduction across the network. These measures will focus on areas where they are most appropriate and where the greatest water savings can be achieved. Preparations for these actions will begin during the Enhanced Monitoring and Operations level, with the flexibility to bring forward leakage and pressure reduction activity if demand rises significantly ahead of level 1.

3.1 Enhanced leakage

Leakage control is a key activity in managing the balance between water supply and demand, which is an essential part of the overall management of a drought. Our long-term programme for leakage reduction is outlined in our company business plan⁶, in line with our 2024 Water Resources Management Plan (WRMP24)⁷. In addition, we will implement targeted and phased pressure reduction measures for the duration of the drought, from levels 1-3. Reducing pressure in the network helps to lower stress on pipework, which decreases water loss from existing leaks and reduces the risk of new bursts. By managing pressure in a controlled and focused way, we can deliver meaningful water savings while maintaining service levels for customers.

While leakage control is a long-term activity, during a drought situation we will make every effort to further reduce leakage beyond our regulatory target through additional leakage detection and repair alongside pressure reduction. The extent to which, during a drought, will depend on leakage levels and weather conditions at the time. We will:

- increase or reallocate resources on find and fix activities;
- review and adapt our leakage targeting approach, ensuring we're reducing leakage in the areas supplied by water resources that are low;
- step up localised pressure reduction in low risk areas;
- increase advertisement of how to report a leak;
- increase the frequency of our leakage performance reviews and operational meetings;
- utilise fleet vehicles with digital messaging to run water efficiency messaging across the region;
- promote pipe lagging (according to the season) and encourage customers to repairs leaks on their own pipes;
- consider increasing promotion of private leak repair scheme, which offers free repairs (depending on terms and conditions) to leaks on supply pipes to homes;
- proactively contact customers if we believe there might be a leak on their property through analysis of customer meter readings;
- reduce the response time to repair leaks; and
- reduce the time taken to repair visible leaks once reported

Enhanced leakage detection and repair is relevant at all times of year however the success of such activity depends on a variety of circumstances, particularly the time of year and ground conditions. Enhanced leakage detection and repair would continue for the duration of a drought event and will increase as a drought gets more severe. To accelerate repairs, we will:

- collaborate closely with our partners and supply chain;
- engage with Local Authorities and the Highways Agency to shorten notice periods for roadworks; and

⁶ [United Utilities Group Plc - Business Plan 24](#)

⁷ unitedutilities.com/corporate/about-us/our-future-plans/water-resources/water-resources-management-plan/

- intensify both internal and external communications on leakage, launching targeted colleague campaigns, call for prompt leak reporting, and the identification of illegal water use.

3.2 Pressure reduction

To reduce pressure in the network during drought, a Pressure Task Team will be established to co-ordinate and drive the programme of optimisation activities. This team will focus on remote optimisation, performance tracking, reporting, and pressure re-profiling across the network. They will also be responsible for identifying, raising, and tracking any manual optimisation activities required, with delivery split between our own and contractor maintenance field teams. To ensure effective coordination and rapid implementation, daily calls will take place with internal scheduling teams to plan, prioritise, and review manual pressure reductions. During this phase, all cyclic maintenance activity will be temporarily paused, allowing operational teams to focus fully on pressure reduction and optimisation activities across the network.

4. Voluntary use restraint campaign

Voluntary water use restraint plays a vital role in easing pressure on water resources before formal restrictions are required. Through timely and effective communication, we can encourage communities to reduce non-essential water use, helping to protect supplies, safeguard the environment, and delay or even avoid the need for compulsory measures – strengthening both short-term resilience and long-term sustainability.

A key part of managing drought is engaging customers through an agile communication approach that can adapt to changing conditions. Since 2018, we have aimed to reduce our reliance on temporary use bans as the primary means of managing customer demand in our drought plan. We introduced the concept of agile communication in the 2022 Drought Plan and committed to further developing it.⁸ This is critical because it helps to reduce the risk of temporary use bans and disruption to customer service.

During the 2025 drought we adopted a targeted, data-led approach to customer communications. Messaging was prioritised in regions experiencing the greatest pressure on water resources and focused on practical dry weather advice and the availability of water efficiency audits. We also increased the frequency of email communications to customers with higher daily consumption, ensuring those most able to reduce demand received timely prompts and guidance.

To understand the effectiveness of this approach, we analysed customers' fortnightly consumption trends between April and July 2025. The results showed a clear and measurable reduction in water use following the communications. Customers who received three dry weather emails reduced their average consumption by 18.37 litres per day, while those who received two emails reduced consumption by 12.13 litres per day. This demonstrates that targeted, repeated engagement with higher use customers can deliver meaningful behaviour change during periods of water stress, helping to reduce demand when it matters most.

At drought level 1, prior to introducing any water use restrictions, we will increase communications with customers, regulators, and stakeholders in response to the prolonged dry weather and elevated drought risk. We will commence a campaign for voluntary water use restraint by increasing our promotion of water efficiency to customers. This will include communicating our water resources position to the whole of our customer base, comparing actual reservoir levels against the more desirable average position on our website to provide clear and transparent context.

Customers will be encouraged to exercise voluntary restraint in their use of water, and in particular not to use hosepipes connected to the mains water supply to wash cars or water their gardens. This is entirely voluntary, and we appreciate that some customers are more able than others to do this. We will seek the support of our regulators and stakeholders in amplifying our water efficiency messages, including the direct communications planned for both household and non-household customers.

We will begin by assessing the dry weather situation, including resource levels and their locations, the rate of change of these levels and our forecast as to how the weather will affect those resource levels. Once we have assessed this information, we will modify our existing communications to create awareness of the water resource situation and tailor our approach to deliver the demand saving we need by influencing customers to alter their behaviours.

We will first identify segments that we want to reach, for example this may be related to geographical location, whether customers have a meter or hard to reach groups. Based on the customers and geographical areas identified, the communications channels are selected based on our insights from trials and previous experience and the coverage, frequency and tone adjusted as appropriate. Email communications provide flexibility in scale and frequency, whereas radio communications provide greater reach and frequency. For example, if our resource levels have recently worsened and this is forecast to continue, it is likely that we would increase the frequency of our communications. If the incident is across the whole region, we are likely to choose a radio channel that the whole region will receive, such as Heart or Smooth FM. However, if the segment that we want to reach is localised, we may choose to use a more appropriate local channel.

⁸ [Drought Plan \(2022\) - Demand Side Options Appendix](#)

If a drought persists, we will look to see how well our targeted segments are responding and whether any more need to be added. In conjunction, we will review the channels and messaging that we are using to determine how well our messages are “cutting through”. The savings will be measured against the modelled peak of demand during a dry weather scenario to demonstrate whether customer usages is below, in line or above those predictions. Once we have assessed this information, we will modify our existing communications to deliver the demand saving we need by influencing customers to alter their behaviours (see section 6, ‘Communication actions’ technical report).

5. Water use restrictions

To minimise disruption and protect customers, we will begin with the least restrictive measures, such as temporary use bans, and escalate to more impactful actions such as emergency drought orders only when necessary. This phased approach considers the socio-economic impacts of water use restrictions and enables us to engage customers effectively while implementing measures in a gradual, proportionate manner.

Our duties and powers regarding water supply and the application of water demand restrictions during drought are set out in the relevant legislation show in Table 2. In line with regulatory expectations, we will implement these powers in stages, ensuring that each one is fully applied before moving on to the next. The Environment Agency drought plan guidance also outlines the sequence of actions to be taken as drought conditions worsen. Reflecting this guidance, we will introduce temporary use bans as an initial demand-side restriction measure before applying for an Ordinary Drought Order, which includes non-essential use bans.

While temporary use bans form part of the drought level 2 response, entry into drought level 2 will not necessarily result in immediate restrictions being imposed. At drought level 2, we will build on and further escalate the demand management and engagement measures already in place, strengthening customer and stakeholder communications and intensifying targeted action to secure additional demand reductions before formal restrictions need to be introduced.

If monitoring demonstrates that these enhanced measures are insufficient to deliver the demand savings required to protect essential water supplies, we will then implement a temporary use ban in accordance with the relevant legislation (Table 2). A non-essential use ban is a more serious step that we will take if dry conditions continue after a temporary use ban has been implemented.

It is important to note that water companies are not financially penalised by the regulator for introducing temporary restrictions, such as TUBs, during a drought. This allows us to take the necessary actions to manage demand responsibly and protect essential water supplies without concern for regulatory disincentives. More severe measures, such as emergency drought orders, would only be considered if conditions continue to deteriorate.

Our ‘Communications actions’ technical report includes further information on when, how and who we will communicate to before, during and after the implementation of water use restrictions (for more details see Table 2 of the ‘Communications actions’ technical report).

Table 2: Legislation governing formal water use restrictions

Demand management measure	Legislation	Sections	Supplementary statutory instrument
Temporary ban on water use	Water Industry Act 1991	76 (as amended by section 36 of the FWMA 2010)	The Water Use (Temporary Bans) Order 2010
Ordinary drought order	Water Resources Act 1991	73–81 and Schedules 8 and 9	The Drought Direction 2011
Emergency drought order	Water Resources Act 1991	73–81 and Schedules 8 and 9	None

5.1 Exceptions approach

An exception to a water use restriction is where special allowance is given to continue using water for that particular use, as set out in The Water Use (Temporary Bans) Order 2010. The water use restrictions will apply to customers, unless they are eligible to be exempt e.g. watering a garden using a hosepipe due to health and safety reasons. We consider any objections or representations to implementing water use restrictions in a fair way by adopting a common approach to exceptions as set out in this section. The specific details of the temporary use ban and non-essential use ban exceptions are listed in section 5.1.2 and section 5.2.1 respectively.

The UKWIR Drought CoP (2023)¹ categorises exceptions as:

- Statutory Exceptions are defined in the legislation for a particular water use restriction, which are automatically granted by all water companies. Customers do not need to make a representation to obtain permission for exception.
- Non-Statutory 'Common' Exceptions are offered by all water companies in signing the Drought Code of Practice (2023). Such exceptions do not require customers to write or make representation to the water company to obtain permission.
- Non-Statutory 'Bespoke' Exceptions are offered at the discretion of each water company on an individual basis. It is at the discretion of each company if a customer is required to make a representation to the water company to receive an exception.

Our approach to Non-Statutory Common Exceptions is customers who meet the criteria outlined in Table 3 and Table 4 can continue to use water without having to make representation to receive permission to use water for the restricted uses.

Our approach to Non-Statutory Bespoke Exceptions is that if a customer is registered as a Priority Services customer or Blue Badge holder, they will be automatically exempt from the restrictions. Customers who are not yet registered but meet these criteria will be added to the Priority Services Register once they contact us. We continue to encourage all customers who fall under either Non-Statutory Common Exceptions or Non-Statutory Bespoke Exceptions to use water wisely and adopt water-efficient practices.

If a customer wishes to apply for an exception for a reason other than Priority Services eligibility or Blue Badge holder status, they should complete an exception request form online, providing details of why they feel they should be exempt. If the customer cannot complete the form themselves online, we can do this for them on a phone call.

We also recognise that customers may wish to apply for an exception even if they do not consider themselves to be part of an exception category. In these cases, we will consider each case on its individual merits. Temporary Use Bans (TUB)

On 1 October 2010, section 36 of the FWMA (2010) amended section 76 of the Water Industry Act (WIA) (1991). It introduced new powers of restriction on water usage known as temporary use bans; supported by definitions set out in the Water Use (Temporary Bans) Order 2010. The term temporary use ban is now used instead of hosepipe ban as it is more encompassing, including eleven categories of use

Table 1: Summary of demand actions during normal operation and within each drought level

Status	Demand action	Summary	Restrictions to customers
Normal operation	'Business as usual' communications and leakage and demand reductions	'Always on' communications to promote our ongoing water efficiency programme to customers.	None
		Deliver our ongoing programme of leakage and demand reductions in line with our stretching ambitions.	
Enhanced monitoring and operations	Operational actions and water efficiency communications	Reduce operational water use	None
		Enhance water efficiency communications, highlighting the dry weather to promote and encourage voluntary demand reductions.	
Level 1: Increased risk from dry weather	Enhanced leak detection and repair	Company operational measure to accelerate finding and fixing leaks on the network.	None
	Water network pressure reduction phase 1	Company operational measure to lower pressure in the network to reduce leakage and bursts, managing flow to conserve water.	None
	Communication	Adapted communications to raise awareness of water resource situation and promote efficient use of water.	None
	Campaign for voluntary water use restraint	Company operational measure that encourages customers to reduce discretionary water use voluntarily (not legally enforceable). It focuses on public messaging (e.g. avoid hosepipes, shorter showers, delay car washing). It covers domestic and business users but relies entirely on cooperation. It is used in the early stages of drought, to encourage savings before legal restrictions.	None
Level 2: Drought	Water network pressure reduction phase 2	Company operational measure to lower pressure in the network to reduce leakage and bursts, managing flow to conserve water.	None
	Temporary use ban forecast	Forecast the timescale for requiring a temporary use ban	
	Communication	Continue to deliver and promote communication campaigns to delay the introduction of a temporary use ban if possible	None

Status	Demand action	Summary	Restrictions to customers
	Temporary use ban implementation	<p>Statutory restriction on domestic customers under Water Industry Act (WIA) (1991), section 76, as amended by Section 36 of the Flood and Water Management Act (FWMA) (2010). It prohibits specified non-essential uses, once notice is given to customers.</p> <p>To implement a temporary use ban we must be satisfied that we are “experiencing, or may experience, a serious shortage of water for distribution” and that voluntary water use restraints have not brought demand down sufficiently. In these circumstances we will consider implementing a temporary use ban within drought level 2 during the summer (April to September), to reduce external household demand. Our approach to applying a temporary use ban may be at the water resource zone (WRZ) level or on a more local basis, depending on the circumstances and operational requirements at the time and with the aim of introducing restrictions only where it is absolutely necessary.</p>	<p>The Water Use (Temporary Bans) Order (2010), which is the supplementary statutory instrument, defines the following eleven uses of water that will be restricted:</p> <ol style="list-style-type: none"> 23. Watering a ‘garden’ using a hosepipe; 24. Cleaning a private motor vehicle using a hosepipe; 25. Watering plants on domestic or other non-commercial premises using a hosepipe; 26. Cleaning a private leisure boat using a hosepipe; 27. Filling or maintaining a domestic swimming or paddling pool; 28. Drawing water, using a hosepipe, for domestic recreational use; 29. Filling or maintaining a domestic pond using a hosepipe; 30. Filling or maintaining an ornamental fountain; 31. Cleaning walls, or windows, of domestic premises using a hosepipe; 32. Cleaning paths or patios using a hosepipe; and 33. Cleaning other artificial outdoor surfaces using a hosepipe <p>It is important to note that under the temporary use ban legislation, the term ‘garden’ is specifically defined.</p> <p>Statutory health or safety exceptions apply to some of the categories of water use, see section 5.1.2.</p>
Level 3: Emergency planning	Water network pressure reduction phase 3	Company operational measure to lower pressure in the network to reduce leakage and bursts, managing flow to conserve water. It is not legally enforceable.	None

Status	Demand action	Summary	Restrictions to customers
	Drought order to ban non-essential use	Statutory power under Water Resources Act (1991) and sections 73-81 and schedule 8 that extends restrictions to non-essential/commercial/industrial uses and can amend abstraction/discharge conditions.	<p>The Drought Direction (2011), which is the supplementary statutory instrument, defines the range of 10 water use activities that may be prohibited with the successful application of a drought order:</p> <ol style="list-style-type: none"> 21. Watering outdoor plants on commercial premises using a hosepipe; 22. Filling or maintaining a non-domestic swimming or paddling pool; 23. Filling or maintaining a pond; 24. Operating a mechanical vehicle-washer; 25. Cleaning any vehicle, boat, aircraft or railway rolling stock using a hosepipe; 26. Cleaning non-domestic premises using a hosepipe; 27. Cleaning a window of a non-domestic building using a hosepipe; 28. Cleaning industrial plant using a hosepipe; 29. Suppressing dust using a hosepipe; and 30. Operating a cistern in any building that is unoccupied and closed. <p>Statutory health or safety exemptions apply to some of the categories of water use, see section 5.2.1.</p>
Level 4: Emergency restrictions	Emergency drought order	The most severe power under WRA (1991) ⁴ , sections 73-81 and schedule 9, that restricts or prohibits any use of water, including essential domestic supply and enables emergency abstractions.	Last resort to conserve essential supplies by limiting domestic supplies and restricting industrial / commercial water use.

A temporary use ban means customers cannot use water supplied by a water company for a range of household, outdoor and recreational activities until further notice. A temporary use ban helps to reduce the demand for water, and it also raises awareness of the drought. A temporary use ban can be introduced without the need to apply to the Secretary of State under conditions, where our region is experiencing, or may experience, a serious shortage of water for distribution. The term “hosepipe” is not itself defined but includes anything designed, adapted or used to serve the same purpose as a hosepipe. Furthermore, the ban applies to hosepipes, and anything attached to them, like sprinklers and jet washers.

As part of our Water Resources Management Plan 2024⁴ customer research to prepare for the period from 2025 to 2030, customers told us that they would like to see improvements to reduce the frequency of restrictions on water use and drought permits. This refers to our stated levels of service, which stipulate the frequency at which we expect to apply water use restrictions or apply for drought permits and orders during dry weather. Our current minimum stated level of service for a temporary use ban is a 5 per cent chance of being needed in any year, which is equivalent to no more than once in every 20 years on average. Our plans to reduce demand are set out in our Water Resources Management Plan 2024, including measures such as reducing leaks and encouraging more efficient water use, which will enable us to halve the frequency of temporary use bans by 2031 to once in every 40 years (a 2.5 per cent annual chance). An added benefit of this improvement is a corresponding reduction in the expected frequency of drought permits or orders to augment supply, improving from once every 40 years to once every 50 years (a 2 per cent annual chance).

5.1.1 Implementation Policy

To implement a temporary use ban under section 76 of the legislation means to put into effect a prohibition under the statutory power. The trigger for implementing a temporary use ban is when we are satisfied that we are experiencing, or may experience, a serious shortage of water for distribution and that voluntary measures have not reduced demand sufficiently. In these circumstances, we will consider the appropriate timing of implementing a temporary use ban from drought level 2 (April to September), to reduce external household demand.

Demand restrictions provide minimal benefit during the winter months, as activities that drive higher water use, such as garden watering and vehicle washing, are limited at this time of year. As a result, implementing a temporary use ban during the autumn and winter months would be unlikely to deliver meaningful reductions in water demand. We therefore do not propose to introduce a temporary use ban during the winter period (October to March). Where there is a heightened risk that restrictions may be required again the following summer, any water use restrictions introduced during the summer may be retained into the winter months.

Section 76 of the WIA 1991 (as amended) stipulates the following:

- Notice must be given to those affected (no time restriction is imposed).
- As a minimum, notice must be advertised in two newspapers circulating in the area to which the restrictions apply and on the company website.

A range of evidence-led factors will inform the most appropriate point at which to implement a temporary use ban, including:

- Optimal temperature patterns: evidence suggests implementation of a temporary use ban during hot/dry periods in June-July yield greater benefit; therefore, we will use historical demand patterns to anticipate the likelihood of temperature peaks. Temporary use bans are intended to reduce discretionary use, which is predominantly outside use in summer, closely related to weather patterns.
- Customer acceptance: UKWIR (2022)⁹ recommend that effective customer communication is an essential precursor to a temporary use ban and any other more severe restrictions. This highlights the importance of allowing sufficient time for customers to act on voluntary use restraint measures and for assessing their impact before proceeding with formal restrictions.

⁹ [Review of 2022 Drought Demand Management Measures - Summary Report](#)

- High demand: we will estimate peak demand based on historical data, alongside temperature.

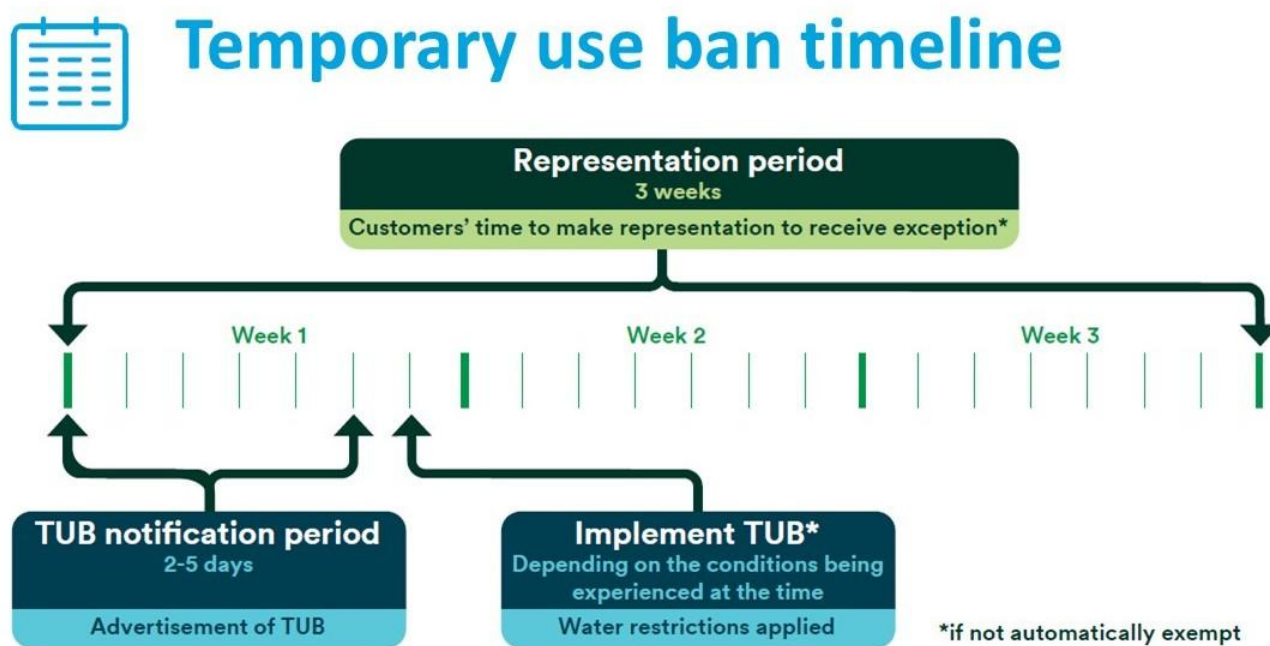
This approach ensures we are prepared to implement a TUB without unnecessary delay where required, while allowing the opportunity for voluntary measures to succeed and maintaining customer trust and engagement throughout the drought response.

Our approach to applying a temporary use ban may be at the water resource zone (WRZ) level or on a more local basis, depending on the circumstances and operational requirements at the time and with the aim of introducing restrictions only where it is absolutely necessary. If we decide to implement restrictions at a smaller scale than at WRZ, we will clearly justify why a smaller geographic area is appropriate and discuss this with the Environment Agency. In addition, Board approval will be sought prior to implementing any temporary use ban.

While legislation does not specify a minimum notice period for advertising a temporary use ban, we will ensure customers have adequate time to prepare before implementing one. The length of the notification period will fall within a 2-to-5-day window prior to the state date, depending on the conditions being experienced at the time. This approach allows us to act with appropriate flexibility while still giving customers a reasonable opportunity to take any necessary preparatory steps. An example of a temporary use ban notice can be found in Appendix A. Statutory and discretionary exceptions would apply under a temporary use ban and we will allow a representation period of three weeks from the notice period for customers to apply for an exception.

The timeline for notifying and implementing a TUB is summarised in Figure 1.

Figure 1: Temporary use ban timeline



During a temporary use ban, we will prohibit all categories of usage outlined in section 76 of the WIA 1991 (as amended). This is because all restrictions contribute to an overall reduction in demand and are therefore necessary during times of drought. Most of the restrictions apply to the use of water drawn through a hosepipe or similar apparatus.

5.1.2 Temporary use ban exceptions

There are Statutory and Non-Statutory Exceptions for circumstances where a hosepipe can be used, as explained in section 5.1. Customers have a three-week representation period from the date of the legal temporary use ban notice (press release). This timescale remains unchanged from our previous Drought Plan 2022, to ensure

customers have the appropriate amount of time to make representations where required¹⁰. For us to consider requests fairly, the exception request must be received within the representation period. Information on how to make representations, including the categories covered by the temporary use ban, will be provided within the legal notice and on our website. We will also offer a dedicated email address for customers to submit their responses.

Customers must comply with restrictions from the implementation date unless they have been explicitly confirmed as exempt. For example, during restrictions on filling or maintaining a domestic swimming pool or paddling pool, customers will be encouraged to use hand-filling methods such as a bucket. Customers may also choose to use public swimming facilities as an alternative, as public swimming pools are not covered by these restrictions.

Priority Services customers who are physically unable, or who cannot safely make adjustments for health reasons, to use a watering can or bucket will be exempt under the non-statutory common exceptions (Table 3). Statutory exceptions will continue to apply as required by law; however, non-statutory exceptions will be removed during a severe drought (see 'Extreme drought measures' report).

To ensure inclusivity, we will advertise the notice widely to maximise the proportion of customers reached, such as through regional publications, social media platforms e.g. Facebook and Instagram, text and email messaging and radio stations, for example Heart radio, to reach a larger audience.

We have a number of measures in place during drought to ensure that we are getting messages to customers proactively and to help reduce the need for them to contact us. These have been further improved following lessons learned from previous years. We have processes in place in the event of an unexpectedly large response. These measures include proactive communication, detailed customer information on our website, FAQs, a customer postcode checker, proactive communication directly to all Priority Services customers and proactive communications to all non-household customers who have made representations previously. Table 3 is taken from the UKWIR Drought Code of Practice and Guidance (2023) and sets out the exceptions that we will grant for a TUB. We will apply all of the exceptions listed in the table below.

5.1.3 Revoking a temporary use ban

The decision to revoke a temporary use ban will be based on improving resource conditions and made in consultation with the Environment Agency. During the drought recovery phase, we will take a careful and proactive approach to lifting restrictions and returning operations to normal. Restrictions will remain in force until we formally end them by issuing a notice confirming that they have been lifted. This approach ensures that the lifting of restrictions supports a sustainable recovery and maintains system resilience.

We will work closely with NAVs when lifting restrictions during drought to ensure a coordinated and consistent approach. NAVs and retailers will be notified in advance of any planned communications about the implementation or lifting of drought measures, allowing customer messaging and engagement to be aligned (see lifting restrictions in Table 2: 'Communication actions' technical report).

¹⁰ [final-drought-plan-2022.pdf](#)

Table 3: Temporary use ban exceptions

Temporary Use Ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
<p>1) Watering a garden using a hosepipe</p>	<ul style="list-style-type: none"> Using a hosepipe to water a garden for health or safety reasons NB In this category, the definition of “a garden” includes “an area of grass used for sport or recreation”. Therefore, it should be noted that 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. A garden includes: a park; gardens open to the public; a lawn; a grass verge; an area of grass used for sport or recreation; an allotment garden; allotment used for non-commercial purposes; any other green space. 	<ul style="list-style-type: none"> Vulnerable customers – A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. Watering of new turf – A hosepipe can be used to water turf at domestic premises where this cannot be reasonably done by watering can, where the turf was laid before the onset of TUBs, and for a period of four weeks which start from the date when the turf was laid, not the start of the TUB. Watering of new trees, saplings, whips, hedging in domestic, gardens – A hosepipe can be used to water standard trees, whips, saplings and hedging planted within a three-year window of the imposition of the TUB (i.e. within the last three years of the start of a TUB), where this cannot be hand watered or watered with non-potable water. Urban trees – <i>NB For clarity:</i> standard trees in urban settings (such as streets, where there is no grass) are not covered by the Temporary Use Ban as they do not fall within the definition of being in an area classed as a “garden”, or “domestic or other non-commercial premises” and therefore they can be watered with a hosepipe. Regardless of where a tree is planted, when watering please consider using non potable water to reduce the amount of mains water used and use water efficiently where possible. 	<ul style="list-style-type: none"> Vulnerable customers – i) A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or ii) A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. Watering of new turf – A drip or trickle irrigation watering system can be used if: <ul style="list-style-type: none"> - they are fitted with a pressure reducing valve and a timer - that are not handheld - that place water drip by drip directly onto the soil surface or beneath the soil surface without any surface runoff or dispersion of water through the air using a jet or mist. Watering of new trees, saplings, whips, hedging in domestic, gardens – A drip or trickle irrigation watering system can be used if: <ul style="list-style-type: none"> - they are fitted with a pressure reducing valve and a timer - that are not handheld - that place water drip by drip directly onto the soil surface or beneath the soil surface without any surface runoff or dispersion of water through the air using a jet or mist.

Temporary Use Ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
<p>2) Cleaning a private motor-vehicle using a hosepipe</p>	<p>(1) a public service vehicle, as defined in Section 1 of the Public Passenger Vehicles Act 1981(c), and</p> <p>(2) a goods vehicle, as defined in Section 192 of the Road Traffic Act 1988(d)</p>	<ul style="list-style-type: none"> Vulnerable customers – A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. Car washing businesses/commercial car washes – None. <i>NB</i> For clarity: A hosepipe can be used in the course of a business to clean private motor vehicles where this is done as a service to customers, where this cannot be reasonably done using a bucket. 	<ul style="list-style-type: none"> Urban trees – None. Vulnerable customers –i) A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or ii) A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. Car washing businesses/commercial car washes – None.
<p>3) Watering plants on domestic or other non-commercial premises using a hosepipe</p>	<p>Does not include watering plants that are:</p> <p>(1) grown or kept for sale or commercial use, or</p> <p>(2) that are part of a National Plant Collection or temporary garden or flower display.</p>	<ul style="list-style-type: none"> Vulnerable customers – A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. Food crops and allotments – A hosepipe may be use to water food crops at domestic premises or private allotments, where this cannot be reasonably done by watering can. Watering of new turf – A hosepipe can be used to water turf at domestic premises where this cannot be reasonably done by watering can, where the turf was laid before the onset of TUBs, and for a period of four weeks which start from the date when the turf was laid not the start of the TUBs. Watering of woodland, trees, saplings, whips, hedging – A hosepipe can be used to water trees, whips, saplings and hedging planted within a three year window of the 	<ul style="list-style-type: none"> Vulnerable customers – None. Food crops and allotments – A drip or trickle irrigation watering system can be used if: <ul style="list-style-type: none"> - they are fitted with a pressure reducing valve and a timer - that are not handheld - that place water drip by drip directly onto the soil surface or beneath the soil surface without any surface runoff or dispersion of water through the air using a jet or mist. Watering of new turf – A drip or trickle irrigation watering system can be used if: <ul style="list-style-type: none"> - they are fitted with a pressure reducing valve and a timer - that are not handheld

Temporary Use Ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
		<p>imposition of the TUB (i.e. within the last three years of the start of a TUB), where this cannot be hand-watered or watered with non-potable water. This covers tree planting by a council and/or charitable/voluntary organisation and covers larger-scale tree planting not individual trees. This also includes young trees planted as part of the 25 Year Environment Plan / Environmental Improvement Plan 2023 and young trees that are planted under a subsidy scheme. A hosepipe can be used to water standard trees in urban settings (such as streets) planted in the last three years that cannot reasonably be hand-watered or watered with non-potable water. (A 'standard' tree is a tree with a single stem with clear trunk (no side branches) for at least 1.8m above the ground.)</p>	<ul style="list-style-type: none"> - that place water drip by drip directly onto the soil surface or beneath the soil surface without any surface runoff or dispersion of water through the air using a jet or mist. The water company reserves the right to inspect RHS advice to allow grass to grow longer to build stronger roots and make grass more resilient. • Watering of woodland, trees, saplings, whips, hedging – A drip or trickle irrigation watering system can be used if: <ul style="list-style-type: none"> - they are fitted with a pressure reducing valve and a timer - that are not handheld - that place water drip by drip directly onto the soil surface or beneath the soil surface without any surface runoff or dispersion of water through the air using a jet or mist.
<p>4) Cleaning a private leisure boat using a hosepipe</p>	<p>(1) cleaning any area of a private leisure boat which, except for doors or windows, is enclosed by a roof and walls.</p> <p>(2) Using a hosepipe to clean a private leisure boat for health or safety reasons</p>	<ul style="list-style-type: none"> • Vulnerable customers – A drip or trickle irrigation watering system can be used if: <ul style="list-style-type: none"> - they are fitted with a pressure reducing valve and a timer - that are not handheld - that place water drip by drip directly onto the soil surface or beneath the soil surface without any surface runoff or dispersion of water through the air using a jet or mist. • Boats – A hosepipe can be used for filling a water tank in a boat where the water is to be used for washing, cooking or sanitation purposes. A hosepipe can be used for commercial cleaning. A hosepipe can be used to clean vessels that are a 	<ul style="list-style-type: none"> • Vulnerable customers – None. • Boats – None.

Temporary Use Ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
		<p>primary residence. A hosepipe can be used to clean boats where fouling is causing increased fuel consumption. A hosepipe can be used on engines that are designed to be cleaned with a hosepipe. A hosepipe can be used to prevent or control the spread of non-native and/or invasive species where other means are not appropriate.</p>	
<p>5) Filling or maintaining a domestic swimming or paddling pool</p>	<p>(1) filling or maintaining a pool where necessary in the course of its construction.</p> <p>(2) filling or maintaining a pool using a hand-held container which is filled with water drawn directly from a tap.</p> <p>(3) filling or maintaining a pool that is designed, constructed or adapted for use in the course of programme of medical treatment.</p> <p>(4) filling or maintaining a pool that is used for the purpose of decontaminating animals from infections or disease.</p> <p>(5) filling or maintaining a pool used in the course of a programme of veterinary treatment.</p> <p>(6) filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in captivity.</p>	<ul style="list-style-type: none"> • Vulnerable customers – hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. • Domestic swimming pool, paddling pool, swim spa, exercise spa – A hosepipe can be used when filling a swimming pool, paddling pool, swim spa or exercise spa that is a fixed structure from empty after construction or significant refurbishment. In this case significant refurbishment should be treated as equivalent to construction. Once it has been refilled then a hosepipe cannot be used for any subsequent filling. • Pool with religious significance – A hosepipe can be used for pools within places of worship or community pools when they are used as part of a religious ceremony. 	<ul style="list-style-type: none"> • Vulnerable customers – None. • Domestic swimming pool, paddling pool, swim spa, exercise spa – None. • Pool with religious significance – None.
<p>6) Drawing water, using a hosepipe, for domestic recreational use</p>	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Vulnerable customers – A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. 	<ul style="list-style-type: none"> • Vulnerable customers – None. • Hot tubs – None. • Caravan or motorhome – None.

Temporary Use Ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
		<ul style="list-style-type: none"> Hot tubs – A hosepipe can be used when filling a hot tub that is a fixed structure from empty after construction or significant refurbishment. In this case significant refurbishment should be treated as equivalent to construction. Once it has been refilled then a hosepipe cannot be used for any subsequent filling. All other uses for hot tubs are not permitted. Caravan or motorhome – A hosepipe can be used for filling a water tank in a caravan or motorhome where the water is to be used for washing, cooking or sanitation purposes. 	
<p>7) Filling or maintaining a domestic pond using a hosepipe</p>	<ul style="list-style-type: none"> Filling or maintaining a domestic pond in which fish or other aquatic animals are being reared or kept in captivity. 	<ul style="list-style-type: none"> Vulnerable customers – A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. 	<ul style="list-style-type: none"> Vulnerable customers – None.
<p>8) Filling or maintaining an ornamental fountain</p>	<ul style="list-style-type: none"> Filling or maintaining an ornamental fountain which is in or near a fishpond and whose purpose is to supply sufficient oxygen to the water in the pond in order to keep the fish healthy. 	<ul style="list-style-type: none"> Vulnerable customers – A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. 	<ul style="list-style-type: none"> Vulnerable customers – None.
<p>9) Cleaning walls, or windows, of domestic premises using a hosepipe</p>	<ul style="list-style-type: none"> Using a hosepipe to clean the walls or windows of domestic premises for health or safety reasons. 	<ul style="list-style-type: none"> Vulnerable customers – A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. Non-mains connection – A hosepipe can be use where cleaning apparatus is not connected to mains supply. Electric pumps that are connected to water butts filled by rainwater are not covered by the restrictions. Graffiti – None. 	<ul style="list-style-type: none"> Vulnerable customers – None. Non-mains connection – None. Graffiti – A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting or offensive, as this links to the statutory H&S exception.

Temporary Use Ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
		<ul style="list-style-type: none"> • Cleaning by a business or commercial enterprise – A hosepipe can be used to clean the walls and windows of domestic premises where this is done by a business as a service to customers. NB For clarity: the use of water-fed poles by commercial cleaners for window cleaning at height is permitted under the H&S Statutory Exception. The domestic use of a water-fed pole is not permitted under TUB. 	<ul style="list-style-type: none"> • Cleaning by a business or commercial enterprise – None.
<p>10) Cleaning paths or patios using a hosepipe</p>	<ul style="list-style-type: none"> • Using a hosepipe to clean paths or patios for health or safety reasons. 	<ul style="list-style-type: none"> • Vulnerable customers – A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. • Non-mains connection – A hosepipe can be used where cleaning apparatus is not connected to mains supply. Electric pumps that are connected to water butts filled by rainwater are not covered by the restrictions. • Graffiti – None. • Invasive species – A hosepipe can be used as part of the process of preventing or controlling the spread of non-native and/or invasive species, where cannot reasonably be done using other preferred means. • Cleaning by a business or commercial enterprise – A hosepipe can be used to clean the paths or patios of domestic premises where this is done by a business as a service to customers. 	<ul style="list-style-type: none"> • Vulnerable customers – None. • Non-mains connection – None. • Graffiti – A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is hate crime, insulting or offensive as this links to the statutory H&S exception. • Invasive species – None. • Cleaning by a business or commercial enterprise – None.

Temporary Use Ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
		<p>NB For clarity: the use of water-fed poles for cleaning at height is permitted under the H&S Statutory Exception. The domestic use of a water-fed pole is not permitted under TUB.</p>	
<p>11) Cleaning other artificial outdoor surfaces using a hosepipe</p>	<ul style="list-style-type: none"> Using a hosepipe to clean an artificial outdoor surface for health or safety reasons. 	<ul style="list-style-type: none"> Vulnerable customers – A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. Non-mains connection – A hosepipe can be used where cleaning apparatus is not connected to mains supply. Electric pumps that are connected to water butts filled by rainwater are not covered by the restrictions. Graffiti – None. Invasive species – A hosepipe can be used as part of the process of preventing or controlling the spread of non-native and/or invasive species, where cannot reasonably be done using other preferred means. Cleaning by a business or commercial enterprise – A hosepipe can be used to clean the paths or patios of domestic premises where this is done by a business as a service to customers. NB For clarity: the use of water-fed poles for cleaning at height is permitted under the H&S Statutory Exception. The domestic use of a water-fed pole is not permitted under TUB. 	<ul style="list-style-type: none"> Vulnerable customers – None. Non-mains connection – None. Graffiti – A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is hate crime, insulting or offensive as this links to the statutory H&S exception. Invasive species – None. Cleaning by a business or commercial enterprise – None.

5.2 Non-Essential use bans – Ordinary drought order

Following the introduction of a temporary use ban and if a drought continues to worsen, we may apply to the Secretary of State for the Environment to restrict non-essential water use through a non-essential use ban (under section 74 of the WRA 1991).

Non-essential use bans enable us to impose further restrictions on the use of water, provided certain legislative tests are met. These powers are sought through applying for an ordinary drought order and brings in greater restrictions to customers, particularly non-household customers. Before initiating this process to extend restrictions, we would seek to confirm that the measures introduced under the temporary use ban are being implemented effectively and are achieving the intended outcomes. In addition, the Department for Environment, Food and Rural Affairs (Defra) would expect us to have exercised our temporary use ban powers to restrict household water use as fully and as appropriately as possible, before seeking an ordinary drought order that would tend to extend restrictions to the non-household sector. In order for the government to grant a drought order, the Secretary of State must be satisfied that an exceptional shortage of rain has led to the serious deficiency of water supplies.

The Drought Direction (2011) defines the ten water use purposes that may be prohibited with the successful application of a drought order (Table 1). Ordinary drought orders to ban non-essential water use tend to cover non-domestic activities, whereas a temporary use ban (under Section 76 of the WIA 1991) tends to cover more domestic activities, although there are exceptions (see section 5.3.2). We will implement a drought order to restrict non-essential use of water before making any further drought permit or order applications.

For non-essential use bans, we would not expect to initiate this restriction more than once in every 80 years, which is equivalent to a 1.25 per cent annual chance, as stipulated in our Water Resources Management Plan 2024.

Implementation Policy

Unlike introducing a temporary use ban, a non-essential use ban requires ministerial approval. Therefore, the timescales for introducing restrictions of a drought order are significantly longer than those for temporary use bans. Timely preparation is essential to ensure measures can be implemented when needed, so we will begin preparing the application early so that the non-essential use ban could be implemented during drought level 3.

The process for implementing an ordinary drought order can be considered in three stages:

1. **Preparing and lodging an application:** We will prepare the formal application and supporting documents before submitting the application to Defra. In applying for a drought order to implement a non-essential use ban, we will provide a cost-benefit analysis to demonstrate that the benefits of the ban justify the associated costs. Our drought order application will include any proposed exceptions (see section 5.2.1). At the time of lodging the application, we will consult formally through a legal notice as required under drought order legislation (WRA, 1991). During this time, members of the public, stakeholders, or organisations can send written objections directly to the Secretary of State. The notice will explain that any objections to the application can be submitted to the Secretary of State within seven days of the publication.

In accordance with schedule 8 of the WRA (1991), the applicant (water company) must publish a notice of the application stating that: *“any person may, within seven days after the publication of the notice, send objections in writing to the Secretary of State”*.

As the statutory period for representations/objections is short, we will begin preparing and consulting informally in advance, so that stakeholders and customers are aware before the formal process begins. This approach should help to minimise delays once conditions trigger the need for a non-essential use ban. We will publish the formal notice widely, including in newspapers, local press, website notice, local publications to invite representations/objections.

2. **Hearings or inquiries:** Defra will consider the application and representations and possibly hold a public inquiry or hearing if objections are significant. A 7-day period is required to advertise the hearing. If there

are no objections or issues, Defra may approve within 28 days. If objections remain unresolved, Defra may hold a hearing or inquiry which could add several weeks.

- 3. Implementation:** Once approved, we must advertise the implementation of the granted drought order. Similarly to implementing a temporary use ban, our approach to applying a non-essential use ban may be at the water resource zone (WRZ) level or on a more local basis, depending on the circumstances and operational requirements at the time and with the aim of introducing restrictions only where it is absolutely necessary. We will gain Board approval before applying for and implementing a drought order to restrict non-essential use of water. Ordinary drought orders are granted for an initial period of up to six months and may be extended once, with approval from the Secretary of State to a maximum total duration of twelve months.

5.2.1 Non-essential use ban exceptions

These exceptions are specific circumstances where certain uses of water may continue, such as for Blue Badge holders, customers on the Priority Services Register, or for essential health, safety, or biosecurity reasons. Exceptions are defined and justified by us within the application and are subject to ministerial approval as part of the overall drought order determination.

Table 4 is taken from the updated UKWIR Drought CoP (2023)¹, which sets out the exceptions that we will grant for a non-essential use ban and we will apply all of these.

5.2.2 Revoking a non-essential use ban

The decision to revoke a non-essential use ban will be based on improving water resource conditions and evidence that supplies and the environment are recovering sustainably. We will work closely with the Environment Agency and Defra to assess the situation and confirm when restrictions are no longer required. Once agreement has been reached, we will either allow the drought order to expire or seek a formal variation or revocation of the order through the appropriate statutory process.

When the non-essential use ban is formally revoked, we will issue a public notice confirming that the restrictions have been lifted and communicate the change to customers, stakeholders including water retailers and NAVs and regulators in line with our technical report 'Communication actions' (see Table 2). This process ensures that the removal of restrictions is transparent, proportionate, and consistent with the principles of sustainable recovery and system resilience.

Table 4: Non-essential use ban exceptions

Non-essential use ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
<p>1) Watering outdoor plants on commercial premises</p>	<ul style="list-style-type: none"> • The purpose specified does not include watering plants that are: <ul style="list-style-type: none"> (a) grown or kept for sale or commercial use; or (b) part of a National Plant Collection or temporary garden or flower display. 	<ul style="list-style-type: none"> • A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. 	<ul style="list-style-type: none"> i) A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or ii) A hosepipe may be used by customers who hold a Blue once they have contacted their water company to be added to the Priority Services Register.
<p>2) Filling or maintaining a non-domestic swimming or paddling pool</p>	<ul style="list-style-type: none"> • The purpose does not include: <ul style="list-style-type: none"> (a) Filling or maintain a pool that is open to the public; (b) Filling or maintaining a pool where necessary in the course of its construction; (c) Filling or maintaining a pool using a hand-held container which is filled with water drawn directly from a tap; (d) Filling or maintaining a pool that is designed, constructed or adapted for use in the course of a programme of medical treatment; (e) filling or maintaining a pool that is used for the purpose of decontaminating animals from infections or disease; (f) filling or maintaining a pool that is used in the course of a programme of veterinary treatment; (g) (g) filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in captivity; (h) filling or maintaining a pool that is for use by pupils of a school for school swimming lessons. 	<ul style="list-style-type: none"> • A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. 	<ul style="list-style-type: none"> • A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or <ul style="list-style-type: none"> - A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. - Swimming pools serving industrial training if considered justified; - Pools with religious significance; - Pools fitted with approved water conservation or recycling systems; - Pools that are subject to significant repair and renovation, defined as: “Pool renovations are classified as alterations that require substantial changes to the shape of a pool or major additions to the structure around the pool. These are treated as new pools. Activities such as retiling or resurfacing existing pools are not classed as renovations.

Non-essential use ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
	<p>For the purposes of paragraph 3(2)(a), a pool is not open to the public if it may only be used by paying members.</p>		
<p>3) Filling or maintaining a pond</p>	<ul style="list-style-type: none"> The purpose does not include: <ul style="list-style-type: none"> (a) filling or maintaining a pond in which fish or other aquatic animals are being reared or kept in captivity; (b) filling or maintaining a pond using a handheld container which is filled with water drawn directly from a tap. The purpose specified in subparagraph (1)(b) does not include filling or maintaining a domestic pond using a hosepipe. 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None
<p>4) Operating a mechanical vehicle-washer</p>	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> A hosepipe may be used by customers who are on the Priority Services Register and are physically unable, or who cannot make adjustments (due to health reasons), to use a watering can or bucket safely. 	<ul style="list-style-type: none"> A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. On grounds of biosecurity to prevent disease-causing agents entering or leaving any place where they can pose a risk.
<p>5) Cleaning any vehicle, boat, aircraft or railway rolling stock</p>	<ul style="list-style-type: none"> Cleaning any vehicle, boat, aircraft or railway rolling stock for health or safety reasons. 	<ul style="list-style-type: none"> A hosepipe may be used by customers who are on the Priority Services Register and are physically unable, or who cannot make adjustments (due to health reasons), to use a watering can or bucket safely. 	<ul style="list-style-type: none"> A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. Small commercial operators whose business partially or wholly depends on work involving the

Non-essential use ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
			<p>washing of private recreational craft or valeting using hosepipes.</p> <ul style="list-style-type: none"> • Those using vessels as a primary residence, which should be subject to the same constraints as any other domestic customer when restrictions are imposed. • Cases in which the fouling of hulls is causing increased fuel consumption by the drag created. • A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting, or offensive. • To prevent or control the spread of non-native and/or invasive species.
<p>6) Cleaning non-domestic premises</p>	<ul style="list-style-type: none"> • Cleaning of any exterior part of a non-domestic building or a non-domestic wall for health or safety reasons. 	<ul style="list-style-type: none"> • A hosepipe may be used by customers who are on the Priority Services Register and are physically unable, or who cannot make adjustments (due to health reasons), to use a watering can or bucket safely. 	<ul style="list-style-type: none"> • A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or • A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. • Small businesses whose sole operations are the cleaning of non-domestic buildings using hosepipes. • Low water use technologies. • A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting, or offensive.
<p>7) Cleaning a window or a non-domestic building</p>	<ul style="list-style-type: none"> • Cleaning a window of a non-domestic building using a hosepipe for health or safety reasons. 	<ul style="list-style-type: none"> • A hosepipe may be used by customers who are on the Priority Services Register and are physically unable, or who cannot make adjustments (due to health reasons), to use a watering can or bucket safely. 	<ul style="list-style-type: none"> • A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or • A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water

Non-essential use ban category	Statutory Exception	Non-Statutory Common Exception	Non-Statutory Bespoke Exception
			company to be added to the Priority Services Register. <ul style="list-style-type: none"> Businesses involved in cleaning windows in non-domestic premises using water-fed poles or similar, provided an alternative (non-potable) water source is used.
8) Cleaning industrial plant	<ul style="list-style-type: none"> Cleaning industrial plant using a hosepipe other than for health or safety reasons. 	<ul style="list-style-type: none"> A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely. 	<ul style="list-style-type: none"> A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting, or offensive.
9) Suppressing dust	<ul style="list-style-type: none"> Suppressing dust using a hosepipe other than for health or safety reasons. 	<ul style="list-style-type: none"> A hosepipe may be used by customers who are on the Priority Services Register and are physically unable, or who cannot make adjustments (due to health reasons), to use a watering can or bucket safely. 	<ul style="list-style-type: none"> A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register.
10) Operating cisterns	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> A hosepipe may be used by customers who are on the Priority Services Register and are physically unable, or who cannot make adjustments (due to health reasons), to use a watering can or bucket safely. 	<ul style="list-style-type: none"> A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register.

5.3 Emergency restrictions – emergency drought order

Emergency drought orders (EDOs) involve putting emergency procedures in place, such as water rationing. If we had to resort to these measures, we would implement our emergency plans.

Applications for emergency drought orders follow the same process and timetable as those for ordinary drought orders. However, emergency drought orders are intended for use in more severe situations where urgent measures are required to protect essential water supplies or the environment. These orders are granted for an initial period of up to three months and may be extended once, to a maximum total duration of five months.

The likelihood of implementing emergency restrictions is extremely low. Our stochastic drought modelling indicates that we are resilient to a 1 in 200-year drought up to 2039, which is equivalent to a 0.5 per cent annual chance of requiring an emergency drought order to grant restrictions. From 2039 onwards, our water availability forecast is defined by the new 1 in 500-year resilience standard for emergency drought orders. Our Water Resources Management Plan 2024 commits to enhancing resilience to emergency drought orders, aiming for these severe restrictions to occur no more than once every 500 years (a 0.2 per cent annual chance) by 2039, which is a substantial improvement from the previous 1 in 200-year standard.

5.4 Compensation arrangements for drought measures

We are appointed by the Secretary of State for the Environment, Food and Rural Affairs to provide water and wastewater services in the North West. Our activities are regulated by the Water Services Regulation Authority (known as Ofwat), the Environment Agency and the Drinking Water Inspectorate. Consumer interests are also represented by an independent body, the Consumer Council for Water.

In line with Condition Q (interruptions in supply because of drought) of our Instrument of Appointment (operating licence) issued under the WIA (1991), compensation may not be payable if Ofwat determines that we took all reasonable steps to avoid the circumstances leading to the drought order.¹¹

Compensation for customers affected by supply interruptions as a result of an emergency drought order is set out in Condition Q and our Standards of Service.¹² Where a customer's water supply is interrupted because of emergency drought restrictions, we will automatically pay £10 for each day (or part day) that they are without water, up to a maximum amount equal to the average household water bill for the previous year.

Ordinary drought orders and temporary use bans do not generally result in interruptions to water supply and therefore do not trigger compensation payments under our Guaranteed Standards Scheme.

Further information around compensation for not meeting our standard levels of service can be found on our company website under our standards of service.¹²

¹¹ [Conditions of the appointment](#)

¹² [Our promise to you - Standards of service](#)

6. Benefits of demand actions

We have reviewed the suitability and effectiveness of demand actions. This has been carried out in line with the latest Environment Agency drought plan guideline and informed by benchmarking against current industry best practice, research, and evidence from recent droughts across the UK. The review ensures that our estimates of demand savings remain robust, evidence-based, and reflective of current customer behaviour and water use trends.

The benefits of implementing demand actions are measured through the observed reduction in customer water use following their introduction. This is supported by detailed analysis of distribution input and demand trends, which allows us to isolate the effect of restrictions from other factors such as weather, seasonality, and customer demand patterns. The effectiveness of each demand action is assessed by comparing actual demand against forecast and baseline conditions to determine the level of savings achieved.

During drought, we will monitor daily and weekly demand across each resource zone to understand how customers respond to restrictions and communications. This ongoing monitoring provides valuable insight into the effectiveness of individual demand actions and helps refine our assumptions over time (see section 6). The estimated demand saving values for each demand action, shown in Table 5, are expressed as a percentage of forecast distribution input (2026–2027), consistent with our Water Resources Management Plan 2024. The year of selection (2026-27) for the distribution input value is the first calendar year of our Drought Plan.

To inform these estimates, we also draw on historic drought data, post-event reviews, and industry research to understand how demand reductions have varied under different levels of restriction and public messaging. This allows us to apply realistic and evidence-based assumptions when modelling the potential benefits of measures such as temporary use bans and non-essential use bans.

The findings from this ongoing monitoring and evaluation process are used to strengthen future drought planning, ensuring that restrictions are introduced only where they are expected to deliver measurable and sustainable benefits. Our current estimates of potential demand savings from each type of restriction are summarised in Table 5 and discussed further in the following sections. While there are inherent uncertainties associated with these estimates, this reflects the limited number of recent drought events where we have had to implement demand restrictions, such as temporary use bans and non-essential use bans. As such, opportunities to directly observe and quantify their impact have been relatively few. Ongoing monitoring during drought will therefore play an important role in testing, validating, and refining the effectiveness of each demand action to strengthen the evidence base.

There are also statutory exceptions, particularly in relation to Health and Safety, which are universally applied and would impact the projected savings further. Their effectiveness is also dependent on customer behaviour and other factors, such as the weather, timing within the year and the influence of holidays and/or major events. Despite this uncertainty, the benefits of water use restrictions are apparent during drought events because they play an integral role in slowing down the rate at which demand increases, in attenuating peaks in demand, and in reducing the overall amount of demand.

Table 5: Estimated seasonal demand actions savings (non-cumulative)

Drought Level	Demand action	Agreed estimated savings	
		Summer (Apr – Sep)	Winter (Oct – Mar)
1	Voluntary use restraint	2%	1%
1	Enhanced leakage	0.17%	0.17%
1	Pressure reduction (phase 1)	0.62%	0.62%
2	TUB	3%	0%

Drought Level	Demand action	Agreed estimated savings	
		Summer (Apr – Sep)	Winter (Oct – Mar)
2	Pressure reduction (phase 2)	2.04%	2.04%
3	NEUB	0.68%	0.30%
3	Pressure reduction (phase 3)	0.75%	0.75%

To ensure that our assumed demand savings are based on the best available evidence, we have undertaken a comprehensive technical review of how water efficiency measures, temporary use bans and other water use restrictions are represented within our water resource system models.

This review aimed to align our demand-saving assumptions with both the wider water industry and our own historical experience. It considered multiple sources of evidence, including:

- Published literature and recent technical studies on drought demand management;
- Our own operational experience from the 1995/96, 2010, 2018 and 2022;
- Findings from a Met Office commissioned study quantifying the effect of voluntary demand reduction and the temporary use ban representation period during summer 2018; and
- Evidence from other water companies’ drought plans and UKWIR research, which provide a benchmark for typical savings achieved across the industry.

The results of this review are summarised in Table 6, which compares demand savings derived from literature, other companies’ drought plans, our measured evidence, and the rationale for our updated assumptions used in this Drought Plan 2027.

Table 6: Estimated demand savings based on wider literature review and industry benchmarking

Drought Level	Demand action	Literature review	Other Water Companies (latest Drought Plans)	Measured reduction at United Utilities	Demand saving rationale for Drought Plan 2027
1	Voluntary use restraint	<ul style="list-style-type: none"> A maximum 3% saving can be assumed over the peak summer months (July-August) – Atkins Technical Note, 2020.¹⁶ 	<ul style="list-style-type: none"> Anglian Water (3-10%) Dŵr Cymru (0-5%) Severn Trent (0-2%) South West Water (2.5%) Yorkshire Water (3-5%) 	<ul style="list-style-type: none"> 2-3% West Cumbria trial in 2019 (see section 6.3). 0-4% (2% average) – Met Office study, 2020. The study commissioned by UU, quantified the impact of voluntary demand actions in the summer of 2018.¹³ 	<ul style="list-style-type: none"> Our 2% assumed saving for peak demand months represents a realistic standalone benefit for voluntary use restraint. Most other water companies report total savings of around 5% when voluntary restraint is combined with Temporary Use Bans (TUBs), implying that the voluntary phase alone typically achieves around 2-3%. This aligns with our observed 2-3% reduction during the 2019 West Cumbria trial and reflects a conservative, evidence-based estimate. No change to Drought Plan 2022.
2	Temporary Use Ban	<ul style="list-style-type: none"> 3.34% (standard deviation 2.78%) – UKWIR Artesia report (2022).^{*14} Quantified the reduction in demand based on the six water companies that implemented TUBs in 2022. 	<ul style="list-style-type: none"> Anglian Water (3-10%) Dŵr Cymru (up to 5%) Severn Trent (5%) South West Water (5%) Yorkshire Water (3-5%) 	<ul style="list-style-type: none"> 3% in 2010 2% at start of representation period in 2018. 3-5% in 1995-96 	<ul style="list-style-type: none"> Our 3% assumed saving for peak demand months is representative of the evidence-based UKWIR review of 2022 drought demand management measures and reflective of the combined voluntary use restraint savings which would be 5% in total. No change to Drought Plan 2022.
3	Non-essential use ban	<ul style="list-style-type: none"> 18.6% - UKIWR (2007) 2006 Sutton and East Surrey Water NEUB.¹⁵ 	<ul style="list-style-type: none"> Anglian Water (14-20%) Severn Trent (5%) Dŵr Cymru (0-5%) South West Water (2.5%) Yorkshire Water (up to 6%) combined savings 	<ul style="list-style-type: none"> 0.2% in 1995-96 	<ul style="list-style-type: none"> 0.68% summer, 0.30% winter. This is a change from 5% in Drought Plan 2022 (10% Including saving from voluntary savings and Temporary Use Ban) – see section 6.5.

¹³ Met Office - United Utilities Summer 2018 peak demand (2020)

¹⁴ [UKWIR Artesia review of 2022 Drought Demand Management Measures - Summary Report \(2023\)](#)

¹⁵ [UKWIR Assessing the costs and benefits of nonessential use Drought Orders – A Feasibility Study \(2025\)](#)

6.1 Demand savings from enhanced leakage

The estimated leakage saving from enhanced find and fix activity has been calculated using the number of additional repairs per week undertaken during June to September 2018 (approximately 18 weeks), multiplied by the assumed leakage saving per repair from the Water Resources Management Plan 2024 technical data tables. The analysis compares the average weekly repair rate in summer months with the annual average to determine the uplift in leakage activity achievable during drought conditions. The 2018 drought was selected as the reference year because leakage detection and repair activity was significantly increased in response to the prolonged hot and dry conditions.

Planning for enhanced leakage activity begins ahead of drought level 1, with implementation during level 1. Applying the latest PR24 flow rates ensures that the resulting leakage benefit estimate is realistic, evidence-based, and consistent with current leakage performance metrics. Based on this assessment, we estimate that enhanced find and fix activity could deliver a potential saving of up to 0.17 per cent (2.8 MI/d) of distribution input.

Savings achieved through enhanced leakage detection and repair are expected to vary across the region, depending on factors such as local drought severity, regional resource pressures, the location and condition of network assets, and the timescale for implementation. Activities will be targeted to those areas where the greatest benefit can be achieved, ensuring that enhanced leakage detection and repair support the most effective and efficient response to local drought conditions. The assumed leakage savings through enhanced detect and repair activities is based on a desktop estimate only, therefore there is a range of uncertainty in the volumetric (MI/d) savings.

It is important not to place undue reliance on leakage detection and repair delivering a specific demand reduction, as the actual outcome depends on factors such as soil moisture deficit, existing leakage levels, and the availability of detection and repair resources. During drought conditions, leak breakout rates often increase due to the relationship between soil drying, ground movement, and pipe stress. In such cases, additional resources may be required simply to maintain existing leakage levels, and the main benefit of enhanced leakage activity may be to limit further increases rather than achieve a net reduction.

It should be noted that the leakage and pressure management demand savings described are maximum benefits. These will become increasingly difficult to attain as we reduce leakage in line with our long-term performance targets.

6.2 Demand savings from pressure management

In Drought Plan 2022, pressure management was represented using fixed minimum pressure values at the highest network point – 18 metres, 15 metres, and 10 metres for drought levels 1, 2, and 3 respectively. This approach assumed that the network could maintain supply at each level but carried a high degree of uncertainty, as it was not based on measured network data. Consequently, only 50 per cent of the estimated savings were considered deliverable. Leakage savings were derived using leakage per kilometre of main, and a pressure-leakage sensitivity factor of 1.25 was applied.

For Drought Plan 2027, our baseline target pressure for all Discrete Pressure Areas (DPAs) is optimised to 15 metres. The improved methodology is based on reducing pressure in a phased approach at each drought level using the data we have for each DPA across our six operational counties. This represents a shift from a generic assumption-based method to a more data-driven, locally responsive approach, with improved confidence in both operational feasibility and customer impact. The pressure reduction at each drought level and estimated demand saving is shown in Table 7.

The model accounts for both remote-controlled and fixed Pressure Management Valves (PMVs), which affect the time and practicality of implementation. The refined pressure-leakage sensitivity factor of 1.2 reflects current pipe performance and response to pressure changes.

This phased approach ensures that pressure reductions are introduced gradually, balancing leakage reduction potential against service reliability and customer experience. It also allows for enhanced operational assurance, as each stage can be validated through real-time monitoring and engagement with network operations teams before progressing to deeper reductions under worsening drought conditions.

Table 7: Pressure reduction at each drought level and estimated demand saving (non-cumulative)

Summary	Level 1	Level 2	Level 3
Phased pressure reduction	Remote DPAs to 10m between the hours of 00:00 – 06:00	All DPAs to target 10m at highest property	All DPAs to target 7m at the highest property
Leakage benefit from pressure reduction	10.4 Ml/d	34.2 Ml/d	12.6 Ml/d
Demand benefit (percentage reduction of WRMP24 Distribution Input 2026/27)	0.62%	2.04%	0.75%

6.3 Demand savings from voluntary water use restraint

To strengthen our understanding of how customer behaviour influences water demand, we have combined insights from previous drought events, targeted trials, and wider industry evidence.

Following the drought in summer 2018, we commissioned the Met Office to assess the impact of our voluntary demand-side communications. Between 1 June and August 2018, we ran a series of press and radio campaigns encouraging customers to reduce their water use voluntarily. Although a temporary use ban was announced on 17 July 2018, it was not implemented. The Met Office analysis concluded that these campaigns achieved an average demand saving of around 2 per cent, providing strong evidence that voluntary restraint can deliver measurable reductions when effectively communicated.

Since then, we have undertaken a home audit trial in West Cumbria to test how in-home water efficiency advice and device installation could further influence household behaviour. We targeted 4,900 properties and successfully completed 4,448 installations of water-saving devices. By comparing consumption from participating metered households with neighbouring metered control properties, we found average savings of 2-3 per cent. This demonstrated that proactive customer engagement, through in-home audits or targeted communication, can achieve meaningful reductions in demand within this range.

We then reviewed evidence from other water companies and published literature. Across the industry, most companies report combined savings of around 5 per cent when voluntary restraint is followed by a temporary use ban, implying that the voluntary phase alone typically achieves 2-3 per cent. This is consistent with both our internal findings and the conclusions from national UKWIR studies.

Taking all this evidence together - the Met Office analysis, our West Cumbria trial, and wider industry benchmarking - we consider a 2 per cent saving in peak summer demand to be a robust and representative assumption. For winter drought conditions, when outdoor use is lower and communications focus is on indoor efficiency (e.g. lagging pipes to prevent bursts), we assume a 1 per cent saving.

Our approach is to prioritise voluntary water use restraint during the early stages of a drought. We consider well-timed, targeted communications and behaviour-change activity to be equally, and in some cases more, effective than formal restrictions in reducing demand. As such, our focus is on promoting early and sustained voluntary restraint to achieve the necessary demand reductions, with temporary use bans considered where voluntary measures alone are insufficient (see Section 6, ‘Communication actions’ technical report). We will further review the benefits from implementing voluntary use restraint during the 2025 drought period as part of our 2025 lessons learned activities.

6.4 Demand savings from temporary use bans

Our current model assumption is based on a study of 2018 demand patterns and evidence, which showed an additional demand saving (over and above that achieved from voluntary use restraint) of around 2 to 3 per cent when a temporary use ban was announced. During the 2010 drought, the implementation of a temporary use ban resulted in an estimated 3 per cent reduction in demand. Therefore, we estimate a peak demand saving from a ban

to be 3 per cent over and above the 2 per cent saving from voluntary use restraint (5 per cent saving in total), during the summer months of April to September inclusive.

Our temporary use ban saving (3 per cent summer, 0 per cent winter) is supported by a technical review into demand actions, which concluded the cumulative 5 per cent demand saving from implementation of a voluntary call for restraint and temporary use ban is well aligned with the industry and with our neighbouring water companies: Severn Trent, Yorkshire Water and Dŵr Cymru (see Table 6).¹⁶ In addition, the review of the 2022 demand actions (UKWIR)¹⁴ concluded that the implementation of temporary use bans was observed to reduce distribution input consistently in all six company areas where these interventions were applied. Analysis suggests that in the period from when bans were introduced, up to 11 September 2022, distribution input at the company level reduced by 3.34 per cent with a standard deviation of 2.78 per cent.

As previously stated in section 5.1.1, the benefit of demand restrictions during the winter is negligible given the limited use of water externally for garden watering and washing motor vehicles where most usage is seen. Therefore, we believe that introducing a temporary use ban in winter and autumn months is not appropriate as it will not result in a reduction in demand for water. Consequently, we do not plan to introduce a temporary use ban during the winter period (October to March).

6.5 Demand savings from non-essential use bans

Evidence from the 1995/96 drought indicated that very small demand savings were achieved from a drought order (approximately 0.2 per cent demand reduction). In 2020, we commissioned a technical review of our demand action saving assumptions to provide updated recommendations.¹⁶ The report found that our previous estimate of 0.2 per cent (Drought Plan 2018) was at the lowest end of the industry range of assumptions and was inconsistent with literature review findings. The technical review recommended that more realistic savings from non-essential use bans would be around 5 per cent of annual average demand, which we applied in Drought Plan 2022.

Since publishing our 2022 Plan, we have further strengthened our evidence base by developing our own non-household consumption model to estimate the potential impact of non-essential use bans on non-household water use. The model segments consumption by industry type using Standard Industrial Classification (SIC) codes (e.g. paper, retail, education) and uses consumption data from 2017/18 to 2023/24 to calculate seasonal and annual averages. From this, we have estimated percentage savings for each non-essential use ban restriction by industry type.

Under our current assumptions, we estimate that total water savings from non-essential use bans would be approximately 3.5 per cent during summer, 1.5 per cent during winter, and 2.5 per cent on an annual average basis, combining both potable and non-potable supplies. It is important to note that these savings relate specifically to non-household demand. The demand saving percentages presented in Table 5 are derived by applying these savings to forecast non-household consumption for 2026/27 and are expressed as an overall percentage of distribution input for that year.

6.6 Measuring the effectiveness of demand actions

Measuring the benefits of our demand actions is critical in allowing us to adapt and target our approach to reducing demand for water as effectively as possible. In order to continually refine and improve our understanding of the benefits of demand actions, in any future dry weather/drought events, we will take steps to increase monitoring in order to assess the impact on customer demand. This is an important element of our activity, both during and after a drought, in order to improve our estimates of the demand savings from demand actions.

As part of normal operations, we undertake a weekly review of demand levels to support our water production planning and other operational activities (e.g. activities related to our leakage and water efficiency programmes). We monitor demand for water at a resource zone level, as well as at a demand monitoring zone¹⁷ (DMZ) level and a

¹⁶ Atkins WP4 Demand Side Options – Technical Note (2020)

¹⁷ We have 33 demand monitoring zones and they align quite closely to the historic council boundaries

district metered area¹⁸ (DMA) level. These demands are also retrospectively analysed to better understand the factors that influence demand for water (e.g. weather patterns).

In addition to our weekly review of demand levels, we enhance our understanding of water usage patterns by collating and analysing detailed customer meter data. This includes:

- **Automatic meter reading (AMR) data** from both household and non-household customer meters, which provides regular snapshots of consumption; and
- **Continuously logged data** from non-household customer meters, offering high-resolution insights into usage trends and variability.

Real time demand tracking through the use of meter data is providing a number of benefits including enhanced customer service and water efficiency, faster leakage detection and resolution and improved data availability. Customer metering analysis is helping us improve service delivery by enabling the deployment of smart meters. These meters support customers in managing their water consumption more effectively and contribute to reducing Per Capita Consumption (PCC). The broader benefits of smart metering highlight the value of a large-scale rollout. Through continuous flow monitoring, we can more quickly identify leaks and act promptly to reduce water loss. In addition, the access to more frequent data is improving our ability to identify and address leakage issues efficiently, strengthening our overall water management capabilities.

We are combining more of this information together in operational and management dashboards to gain a clearer picture of water consumption, usage trends, and leakage. This holistic view, combined with behavioural analytics and customer research, enables us to more accurately quantify demand-related uncertainties (see Table 8). As a result, we can better assess the benefits of demand management actions, particularly during drought conditions by identifying where and how water savings are achieved.

During dry weather and drought, this improved understanding supports more precise estimation of the effectiveness of demand actions, such as targeted communications or water efficiency campaigns. The impact of these measures is monitored through ongoing analysis of demand data, which is fed back to our communications team to evaluate and refine our approach.

This feedback loop not only enhances the agility of our drought response but also provides measurable benefits: reduced peak demand, improved customer engagement, and more efficient use of water resources. These outcomes form a key part of our agile communication strategy (see ‘Communication actions’ technical report, section 6).

Table 8: Key demand-related uncertainties that can impact our understanding of the benefits of demand side options on consumption/usage

Uncertainty	Context	How we will treat uncertainty
Behaviour	We are trying to measure the impact of changes in water using behaviour; however this behaviour is also influenced by numerous external factors.	Detailed monitoring and analysis, combined with customer research to better understand water using behaviours.
Leakage	Changes in leakage will directly impact demand for water.	Use district metered area (DMA) leakage data to understand changes in leakage over the course of the dry weather/drought event.
Weather	Linked to behaviour, hotter and/or dryer weather often leads to increases in consumption/usage.	We can understand the impacts of weather on demand for water using weather-demand models, combined with customer research to better understand water using behaviours.

¹⁸ These are the same areas used for leakage reporting and targeting – we have around 2,600 active DMAs

7. Implementation timetable

We have undertaken a comprehensive review of the time required to prepare, mobilise, and implement our demand actions, along with the estimated lag time before benefits are realised, their expected duration, and the key underlying assumptions. This review ensures that each demand action is realistically timed and that any operational constraints are fully understood. We recognise that the timing of these factors can have a significant influence on when drought levels are reached and how effectively demand can be managed. As a result, we have incorporated detailed implementation timetables for each demand action into our drought level modelling, providing a more accurate representation of when benefits are likely to occur in practice. This is further described in Figure 2. The implementation timetable of demand actions at each associated drought level is shown in Table 9.

Figure 2: Drought actions implementation timetable

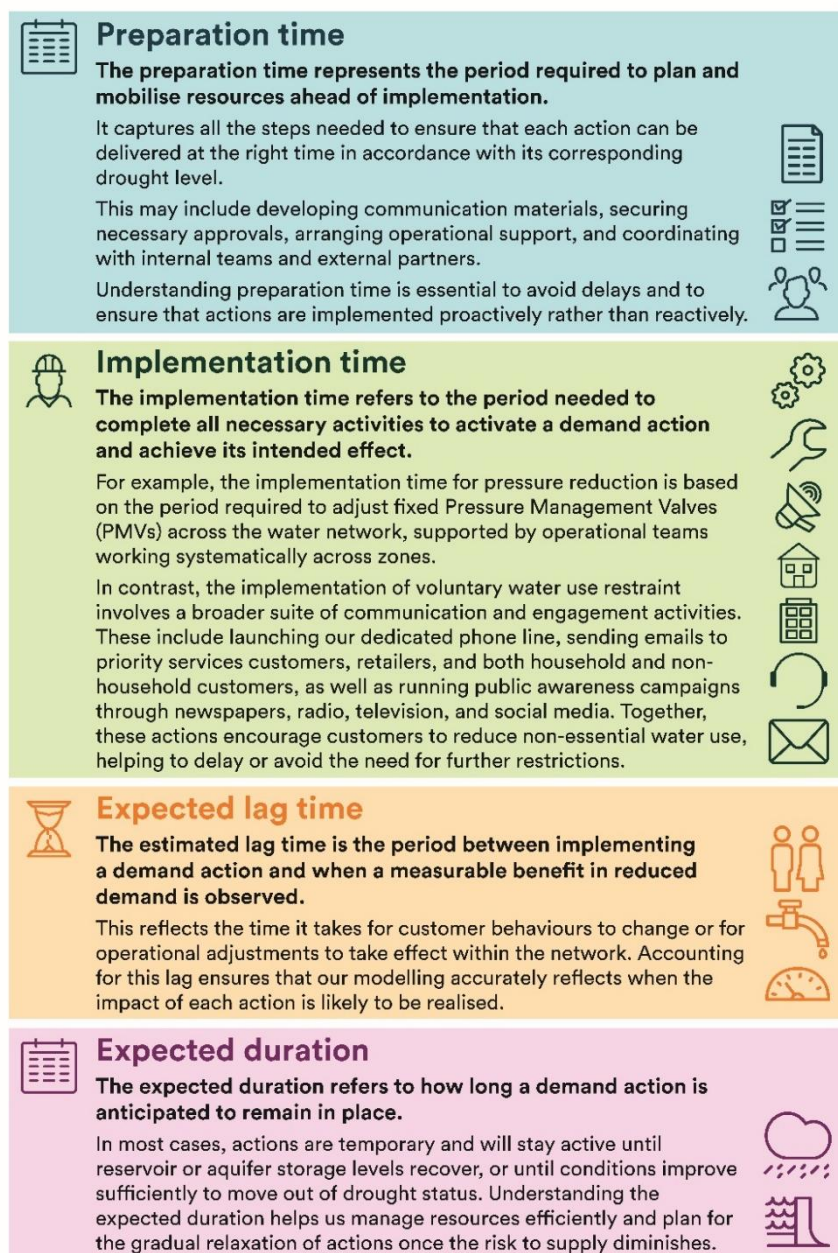


Table 9: Implementation timetable of demand actions

Demand action	Drought level	Preparation time	Implementation time	Estimated lag to benefit impact	Expected duration	Key assumptions
Voluntary use restraint	1	Significant planning and mobilisation in advance of reaching level 1	11 days to roll-out communications	After 3 days	Levels 1-4 (until storage recovers)	Early communications; benefit from voluntary customer response
Enhanced leakage	1	Significant planning and mobilisation in advance of reaching level 1	Up to 56 days to repair additional leaks to realise the benefit	After 56 days	Levels 1-4 (until storage recovers)	Long lead-in: impact may occur in subsequent levels
Pressure reduction (phase 1)	1	Minimal	0 days	Halfway through implementation	0 days	Based on adjustment of 2,049 remote PMVs
TUB	2	Significant planning and mobilisation in advance of reaching level 1	5 days	After 5 days	Levels 2-4 (until storage recovers)	Dependent on the geographical scale of implementation
Pressure reduction (phase 2)	2	Minimal	0 days	Halfway through implementation	Level 2-3	Based on adjustment of 2,049 remote PMVs
Pressure reduction (phase 2)	2	Onboard additional resource	Up to 23 days	Halfway through implementation	Level 2-3	Based on adjustment of 954 fixed PMVs
NEUB	3	Significant planning and mobilisation during level 2 in advance of reaching level 3	7 days (representation period) + 28 days (Secretary of state decision on application)	Immediate	Up to 6 months, or extension up to 12 months	Requires drought order granted
Pressure reduction (phase 3)	3	Minimal	0 days	Halfway through implementation	Level 3-4	Based on adjustment of 2,049 remote PMVs
Pressure reduction (phase 3)	3	Minimal	Up to 23 days	Halfway through implementation	Level 3-4	Based on adjustment of 954 fixed PMVs

8. Demand actions

Action Name: Enhanced leakage detection and repair	
Trigger for action	On reaching drought level 1, we will enhance our leakage detection and repair activities and will be targeted to those areas where it is considered appropriate, and where the greatest savings can be achieved.
Demand Saving Percentage or MI/d reduction	Potential saving of up to 2.8 MI/d (0.17% of distribution input). Savings made through enhanced leakage detection and repair will vary across the region and will depend upon the situation in other regions of the country, the location and severity of the drought and the timescale for implementation of the action.
Location Area affected or whole supply zone	Enhanced leakage detection and repair would be targeted to those areas where it is considered appropriate, and where the greatest savings can be achieved.
Implementation timetable	Leakage control is a key activity in managing the balance between water supply and water demand. Our long-term programme for leakage reduction is outlined in our business plan in line with our Water Resources Management Plan. Enhanced leakage detection and repair is relevant at all times of year, however the success of such activity depends on a variety of circumstances, particularly the time of year and ground conditions. Enhanced leakage detection and repair would continue for the duration of a drought event.
Permissions required and constraints	Liaise with councils and Highways Agency to reduce notice periods required before a repair can be carried out in the highway
Risks associated with option	It is important not to place reliance on enhanced leakage detection and repair achieving a pre-defined demand reduction since the magnitude of any reduction is influenced by a variety of circumstances i.e. leakage levels and weather conditions at the time
Action Name: Campaign for voluntary water use restraint	
Trigger for action	In order to encourage a reduction in customer demand for water, we will commence a campaign for voluntary water use restraint at drought level 1. The message will be conveyed through the use of press releases and coverage on our website and social media channels. This action will be done in accordance with our agile communications approach.
Demand Saving Percentage or MI/d reduction	The saving associated with a campaign for voluntary water use restraint has been estimated to be 2% (summer) and 1% (winter). Our ambition is to delay temporary use ban implementation as much as possible through agile communications, where greater emphasis will be made on voluntary use restrictions through our behaviour change strategies in order to make the demand savings we need.

	The success of voluntary use restraint is influenced by a variety of circumstances, such as the weather (particularly temperature), soil moisture deficit, political climate and uptake of publicity by local and national media. All of these factors play a part in reducing demand.
Location Area affected or whole supply zone	A campaign for voluntary water use restraint will only be introduced in those areas where it is considered appropriate, as in the case of the 2010 and 2018 drought where voluntary use restraint was only implemented in the Strategic Resource Zone.
Implementation timetable	<p>Duration of a campaign for voluntary water use restraint will depend on the particular circumstances of a drought event.</p> <p>A substantial customer communications programme would accompany a campaign for voluntary water use restraint to highlight the reasons it is needed to help conserve water and to explain the actions being taken by us to protect water supplies.</p> <p>We will also communicate with the Consumer Council for Water, Ofwat and other regulators and bodies as appropriate. Neighbouring water companies, licensed suppliers and inset appointees will also be informed in case of any queries from their own customers. We will also seek to provide a telephone information line or similar service to deal with customer queries, and this will be publicised as part of the communications programme.</p> <p>There will be no prior notification for the public for a campaign for voluntary water use restraint, however communications leading up to it will highlight the need for it should customer demand not reduce, and drought permits/orders continue to be required.</p>
Permissions required and constraints	The decision to commence a campaign for voluntary water use restraint rests with the board of United Utilities.
Risks associated with option	It is important not to place reliance on a campaign for voluntary water use restraint achieving a pre-defined demand reduction since the magnitude of any reduction is influenced by a variety of circumstances. It is important to consider the credibility of any communications with customers.

Action Name: Temporary use ban	
Trigger for action	<p>For us to implement a temporary use ban we must be satisfied that we are “experiencing, or may experience, a serious shortage of water for distribution”. There is no formal definition of this in the legislation but notably there is no explicit link to drought.</p> <p>In these circumstances we will consider implementing a ban at drought level 2 during the summer (April to September), in order to reduce external household demand.</p> <p>Before deciding to introduce a temporary use ban, we would assess customer demand data to establish whether sufficient reductions in demand were being achieved from the campaign for voluntary water use restraint to meet our commitment to customers to not introduce a temporary use ban any earlier than necessary.</p>
Demand Saving	The saving for a temporary use ban has been estimated as 3% (summer) and 0% (winter). . It is anticipated that total savings are around 5% when including voluntary use restraint during the summer months of April to September inclusive. This is based on experience of a temporary use ban introduced by us in 1995/96, 2010 and to a less a degree in 2018.

Action Name: Temporary use ban	
Percentage or MI/d reduction	<p>It is important not to place reliance on a water use restriction achieving a predefined demand reduction since the magnitude of any reduction is influenced by a variety of circumstances, such as temperature, soil moisture deficit, political climate and uptake of publicity by local and national media, which all play a part in reducing demand.</p>
Location Area affected or whole supply zone	<p>Our approach to applying a temporary use ban may be at the water resource zone (WRZ) level or on a more local basis, depending on the circumstances and operational requirements at the time. Board approval will be sought prior to implementing any temporary use ban.</p> <p>A temporary use ban will only be introduced in those areas where it is considered appropriate, as in the case of 2010 drought where one was only implemented in the Strategic Resource Zone.</p>
Implementation timetable	<p>For us to implement a temporary use ban we must be satisfied that we are “experiencing, or may experience, a serious shortage of water for distribution”. There is no formal definition of this in the legislation but notably there is no explicit link to drought. In these circumstances we will give strong consideration to implementing a temporary use ban at drought level 2 during the summer (April to September), reduce external household demand.</p> <p>Duration of the restrictions will depend on the particular circumstances of a drought event. In 1995/96 the temporary use ban was in place for 14 months, whereas in 2010 a temporary use ban was in place for just 42 days. During 2018, we commenced the representation period for a temporary use ban however, it was removed after rainfall arrived and demand subsequently reduced.</p> <p>The length of the notification period will typically fall within a 2-to-5-day window, reflecting the conditions being experienced at the time and the need for clear, timely communication. To meet legislative requirements, we will publish the temporary use ban notice in at least two newspapers circulating in the local area to which it is to apply and on our website, and will consider whether it is necessary to place the notice in more. The temporary use ban notice will be available on our website as a short formal notice in pdf format for customers to download for ease of access. The representation period will begin on the date the temporary use ban notice is issued (via press release) and will remain open for three weeks. We will allow three weeks from the date of the legal notice for a reasonable period of time for representations to temporary exceptions to be made.</p> <p>A substantial customer communications programme would accompany the implementation of a temporary use ban to highlight the reasons for the restriction, the need to comply to conserve water, the details of the restriction, to explain the actions being taken by us to protect water supplies. It would also explain the details of any exceptions available to customers and the process by which a customer may apply for an exception.</p>
Permissions required and constraints	<p>The decision to introduce a temporary use ban rests with the board of United Utilities subject to satisfying the serious deficiency of water available for distribution criteria in Section 76 of the Water Industry Act 1991.</p> <p>Before implementing a temporary use ban, we would consult with the Consumer Council for Water and the Environment Agency. We would have regular communications with these bodies, as well as Ofwat, the Drinking Water Inspectorate, Natural England, Defra and other relevant organisations.</p> <p>To maintain openness and accountability, any requests for exceptions from the restrictions will be assessed and authorised through the established representation process. For us to consider requests fairly, the exception requests must be received within the representation period.</p>

Action Name: Temporary use ban	
Risks associated with option	It is important not to place reliance on a temporary use ban achieving a pre-defined demand reduction since the magnitude of any reduction is influenced by a variety of circumstances. It is important to consider the credibility of any communications with customers.

Action Name: Ordinary drought order (non-essential use ban)	
Trigger for action	<p>Following the implementation of a temporary use ban, we will carefully consider the merits of implementing a drought order to ban non-essential uses of water at drought level 3. This would follow a full assessment of the potential demand savings and the socio-economic impacts such a restriction could have in the North West.</p> <p>A campaign for voluntary water use restraint and a temporary use ban (primarily affecting domestic customers) will always be introduced before a drought order to ban non-essential use (primarily affecting commercial customers) is applied for.</p> <p>Preceding actions could include rezoning of water supplies; bringing water sources online; customer communication actions etc.</p> <p>The implementation of a drought order to ban non-essential use may not necessarily be associated with drought permit/order applications depending on factors such as the likely benefit of such an action.</p>
Demand Saving Percentage or Ml/d reduction	<p>The saving for a non-essential use ban has been estimated as 0.68% (summer) and 0.30% (winter).</p> <p>The benefit will depend upon various factors including the time of year, weather conditions, the supply area concerned and the proportion of demand accounted for by the water uses prescribed in the Drought Direction 2011 (which replaced the Drought Direction of 1991). It will be important to carefully evaluate the possible demand benefits and costs before deciding to implement the ban.</p> <p>In Drought Plan 2022, our assumption is that a drought order will provide an additional 5% demand saving across the year (a cumulative saving of 10% including voluntary reduction and temporary use ban savings, during the summer months of April to September inclusive).</p> <p>Since publishing our 2022 Plan, we have further strengthened our evidence base by developing our own non-household consumption model to estimate the potential impact of non-essential use bans on non-household water use. The model segments consumption by industry type using Standard Industrial Classification (SIC) codes (e.g. paper, retail, education) and uses consumption data from 2017/18 to 2023/24 to calculate seasonal and annual averages. From this, we have estimated percentage savings for each non-essential use ban restriction by industry type (see section 6.5).</p> <p>It is important not to place reliance on a drought order achieving a pre-defined demand reduction since the magnitude of any reduction is influenced by a variety of circumstances.</p>
Location Area affected or whole supply zone	Our approach to applying a non-essential use ban may be at the water resource zone (WRZ) level or on a more local basis, depending on the circumstances and operational requirements at the time. Board approval will be sought prior to implementation.

Action Name: Ordinary drought order (non-essential use ban)	
	<p>A drought order to ban non-essential use will only be introduced in those areas where it is considered appropriate, as in the case of the 1995-96 drought where the ban was only implemented in parts of the region.</p>
Implementation timetable	<p>Following the implementation of a temporary use ban (after level 2 during the summer, i.e. April to September), we will carefully consider the merits of implementing a drought order to ban non-essential uses of water. This would follow a full assessment of the potential demand savings and the socio-economic impacts such a restriction could have in the North West. A drought order will only be introduced in those areas where it is considered appropriate. It will not always be the case that a drought order will be applied across the whole of a resource zone.</p> <p>A substantial customer communications programme would accompany the implementation of a drought order to ban non-essential use to highlight the reasons for the restriction, the need to comply to conserve water and the details of the restriction.</p> <p>We will also communicate with the Consumer Council for Water, Ofwat and other regulators and bodies as appropriate. Neighbouring water companies, licensed suppliers and Inset Appointees will also be informed in case of any queries from their own customers. We will also seek to provide a telephone information line or similar service to deal with customer queries, and this will be publicised as part of the communications programme.</p> <p>The preparation time for a drought order is relatively prolonged due to the need for application to the Secretary of State. There is no statutory time period for the Secretary of State to make a decision. Defra (2015) advise that applicants should allow 28 days for an application to be determined if there are no objections or complications.</p> <p>A drought order can last up to six months, though it can be amended to last up to a maximum of one year. We will have a drought order to ban non-essential use in place no longer than necessary.</p>
Permissions required and constraints	<p>The Drought Direction 2011 relates to ordinary drought orders (non-essential use ban) which are granted by the Secretary of State to restrict water use (under Section 74 of the Water Resources Act 1991). Drought orders (for non-essential use tend to cover non-domestic activities whereas temporary use bans (under Section 76 of the Water Industry Act 1991) tend to cover domestic activities, although there are exceptions.</p> <p>In order to grant a drought order to ban non-essential use of water, the Secretary of State needs to be satisfied that “by reason of an exceptional shortage of rain, a serious deficiency of supplies of water in any area exists or is threatened”. This differs from a temporary use ban as it is expressly linked to drought. The Secretary of State can require a public inquiry or hearing in relation to the drought order, whether or not there are objections to it.</p> <p>For drought orders to ban non-essential water use, a notice will be advertised if a drought order is granted.</p> <p>Our assessment of the relative merits of a drought order in the summer months would be discussed with the Environment Agency and the Consumer Council for Water.</p>
Risks associated with option	<p>It is important not to place reliance on a drought order achieving a pre-defined demand reduction since the magnitude of any reduction is influenced by a variety of circumstances. There is a risk that the Secretary of State will not grant the drought order or may restrict the extent to which certain water uses are curtailed</p>

Action Name: Pressure management	
Trigger for action	Phased pressure reduction in the network. For Drought Plan 2027, our baseline target pressure for all Discrete Pressure Areas (DPAs) is optimised to 15 metres. The improved methodology is based on reducing pressure in a phased approach at each drought level using the data we have for each DPA across our six counties. At drought level 1, remote DPAs will be reduced from 15m to 10m between the hours of 00:00 – 06:00. At drought level 2, all DPAs will be reduced from 15m to 10m at the highest property (including 954 fixed PMVs). Finally, at drought level 3, all DPAs will reduce to 7m at the highest property (including 954 fixed PMVs).
Demand saving Percentage or MI/d reduction	Savings based on leakage and actual target and minimum pressures within each Discrete Pressure Area (DPA) – see Table 7.
Location Area affected or whole supply zone	Targeted areas identified when calculating the savings based on target and minimum pressures within each DPA.
Implementation timetable	<p>The model accounts for both remote-controlled and fixed Pressure Management Valves (PMVs).</p> <p>To reduce pressure in the network during drought, a Pressure Task Team will be established to co-ordinate and drive the programme of optimisation activities. This team will focus solely on remote optimisation, performance tracking, reporting, and pressure re-profiling across the network. The task team will also be responsible for identifying, raising, and tracking any manual optimisation activities required, with delivery split between internal UU maintenance teams and external partners. To ensure effective coordination and rapid implementation. During this phase, all cyclic maintenance activity will be temporarily paused, allowing operational teams to focus fully on pressure reduction and optimisation activities across the network.</p>
Permissions required and constraints	No permissions required however we would concentrate on areas that would provide the biggest demand saving benefits and where there is a low risk of impacting customers and businesses.
Risks associated with option	Reduced pressure in high areas may increase the risk to disruption to service levels. However, every effort will be given to avoid pressure reduction in areas where this is most likely.

Appendix A Example draft document of a formal TUB Notice

WATER INDUSTRY ACT 1991
UNITED UTILITIES WATER LIMITED

STATUTORY NOTICE FOR TEMPORARY BAN ON WATER USE



United Utilities Water Limited gives notice that, pursuant to sections 76 and 76A-C of the Water Industry Act 1991, it prohibits the uses of potable water supplied by it (that is water treated to drinkable standards) set out below. Those subject to the temporary use ban will be customers of United Utilities Water Limited and those in receipt of our water but who may be served by other companies such as business users.

This notice, and further details concerning the prohibitions, current drought and water efficiency advice may be found on the website of United Utilities Water Limited here: [WEBSITE LINK]
Water use restrictions will start on [TIME] on [DATE] and continue until further notification. The restriction applies in the area of supply of [ZONE/ PLACES], as shown in the map below. Thank you for your support at this important time.

Prohibited uses

- The use of a hosepipe, including using sprinklers, dripper hoses, automatic irrigation systems and similar devices, is prohibited for the following:
 - Watering a garden using a hosepipe
 - Cleaning a private motor-vehicle (or a trailer for such a vehicle) using a hosepipe
 - Watering plants on domestic or other non-commercial premises using a hosepipe
 - Cleaning a private leisure boat using a hosepipe
 - Filling or maintaining a domestic swimming or paddling pool
 - Drawing water, using a hosepipe, for domestic recreational use
 - Filling or maintaining a domestic pond using a hosepipe
 - Filling or maintaining an ornamental fountain (including a cascade or any other display of moving water, and includes filling by permanent plumbing)
 - 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.

Note that customers can still undertake the above activities (except activities 5 and 8) if they use mains water from a bucket or watering can (where this is feasible); or use water that is not sourced from the mains such as grey water, rainwater from a water butt, or private boreholes for example. The following activities or situations are exempt from the restrictions:

You will not need to apply for an exception but United Utilities Water Limited may question your use of an exception if reports of hosepipe usage are received or evidence of a hosepipe is detected. Any person who contravenes any of these prohibitions is guilty of an offence and may be liable on summary conviction to a fine not exceeding £1,000.

Restricted hosepipe use (What you can't do)

A "hosepipe" means anything designed, adapted or used to serve the same purpose as a hosepipe. This means that garden sprinklers and irrigation systems (outside of the exception), connected to the mains water supply, are all considered to be hosepipes, together with anything attached to them like pressure washers.

Exception

(Pre-approved exceptions for certain categories of people or uses of water – if one of these applies to you then you can use your hosepipe for this reason)
Any restricted use

- People who may find it hard to make adaptations and are registered with the United Utilities Water Limited Priority Service Register will be granted an automatic exception to any of the restrictions and will receive notification of this directly.
- Blue Badge holders will also be granted an automatic exception without the need to contact us.

Restricted use: Watering a garden using a hosepipe; Cleaning a private leisure boat using a hosepipe; Cleaning walls, or windows of domestic premises using a hosepipe; Cleaning paths of patios using a hosepipe; Cleaning other artificial outdoor surfaces using a hosepipe.

Exception: Where using a hosepipe for any of the restricted purposes is required for unavoidable health and safety, such as removing or minimising any risk to human or animal health or safety or preventing or controlling the spread of causative agents or disease, this will not be restricted.

Restricted use: Filling or maintaining a domestic swimming or paddling pool; Filling or maintaining a domestic pond; Filling or maintaining an ornamental fountain.

Exception: Using a hosepipe where the welfare and/or health and safety of animals including fish is paramount will not be restricted.

Restricted use: Watering a garden using a hosepipe
A "garden" is a private or public garden, a lawn, a park; a grass verge; an area of grass used for sport or recreation; an allotment used for non-commercial purposes; and any other green space.

A garden is not:

- agricultural land,
- land used in the course of a business for growing any crops, fruits, vegetables or other plants for sale or commercial use;
- land used for National Plant Collection;
- a temporary garden or flower display (i.e. on show to the public for no more than 7 days); or
- Plants in an outdoor pot or in the ground under cover (under cover being in a greenhouse, outbuilding or under a permanent canopy).

Exception:

- Using a hosepipe to water a garden for health or safety reasons.

N.B. For clarity: in this category, the definition of a "garden" includes "an area of grass used for sport or recreation". Therefore it should be noted that watering areas of grass, which are used for sport or recreation, is covered by a Statutory Exception for health & safety only in relation to the active strip/playing area, not the entire ground.

- A hosepipe can be used to water turf at domestic premises where this cannot be reasonably done by watering can, where the turf was laid before the onset of TUBs, and for a period of four weeks which start from the date when the turf was laid not the start of the TUB.
- A hosepipe can be used to water trees, whips, saplings and hedging planted within a three year window of the imposition of the TUB (ie within the last three years of the start of a TUB), where this cannot be hand-watered or watered with non-potable water.

Restricted use: Cleaning a private motor-vehicle (or a trailer for such a vehicle) using a hosepipe. A "private motor vehicle" does not include:

- a public service vehicle, as defined in section 1 of the Public Passenger Vehicles Act 1981(c), and
- a goods vehicle, as defined in section 192 of the Road Traffic Act 1988(d). This includes:
 - Public bus
 - Any vehicles covered by an organisation's "Goods Vehicle Operator's Licence"
 - Military vehicles
 - Snow ploughs and gritters
 - Emergency service vehicles (including those used by gas, electricity, water and telephone companies)
 - Hearses and accompanying funeral cars
 - Recovery vehicles (only if they're used exclusively for that purpose)
 - Tractors and agricultural vehicles
 - Mobile exhibition vehicles
 - Catering vehicles
 - Mobile shops
 - Mobile medical screening vehicles
 - Any vehicle of over 3.5 tonnes gross plated weight or (where there is no plated weight) an unladen weight of more than 1,525kg to transport goods for hire or reward or in connection with a trade or business

Exception: A hosepipe can be used in the course of a business to clean private motor vehicles where this is done as a service to customers, where this cannot be reasonably done using a bucket.

Restricted use: Watering plants on domestic or other non-commercial premises using a hosepipe.

Exception:

- The TUB does not apply to watering plants that are grown or kept for sale or commercial use or that are part of a National Plant Collection or temporary garden or flower display.
- A hosepipe can be used to water food crops at domestic premises or private allotments, where this cannot be reasonably done by watering can.
- A hosepipe can be used to water turf at domestic premises where this cannot be reasonably done by watering can, where the turf was laid before the onset of TUBs, and for a period of four weeks which start from the date when the turf was laid not the start of the TUBs.

Restricted use: Cleaning a private leisure boat using a hosepipe

Exception:

- Cleaning any area of a private leisure boat which, except for doors or windows, is enclosed by a roof and walls.
- Using a hosepipe to clean a private leisure boat for health or safety reasons
- A hosepipe can be used for filling a water tank in a boat where the water is to be used for washing, cooking or sanitation purposes.
- A hosepipe can be used for commercial cleaning.
- A hosepipe can be used to clean vessels that are a primary residence.
- A hosepipe can be used to clean boats where fouling is causing increased fuel consumption.
- A hosepipe can be used on engines that are designed to be cleaned with a hosepipe.
- A hosepipe can be used to prevent or control the spread of non-native and/or invasive species where other means are not appropriate.

Restricted use: Filling or maintaining a domestic swimming or paddling pool

Exception:

- Filling or maintaining a pool where necessary in the course of its construction
- Filling or maintaining a pool using a hand-held container which is filled with water drawn directly from a tap
- Filling or maintaining a pool that is designed, constructed or adapted for use in the course of a programme of medical treatment
- Filling or maintaining a pool that is used for the purpose of decontaminating animals from infections or disease
- Filling or maintaining a pool used in the course of a programme of veterinary treatment
- A hosepipe can be used when filling a swimming pool, paddling pool, swim spa or exercise spa that is a fixed structure from empty after construction or significant refurbishment. In this case significant refurbishment should be treated as equivalent to construction. Once it has been refilled then a hosepipe cannot be used for any subsequent filling.

- A hosepipe can be used for pools within places of worship or community pools when they are used as part of a religious ceremony.

Restricted use: Drawing water, using a hosepipe, for domestic recreational use

Exception:

- A hosepipe can be used when filling a hot tub that is a fixed structure from empty after construction or significant refurbishment. In this case significant refurbishment should be treated as equivalent to construction. Once it has been refilled then a hosepipe cannot be used for any subsequent filling. NB For clarity: Where people use hot tub for medical purposes, and cannot fill it with a watering can, then a hosepipe may be used on the grounds of health and safety.
- A hosepipe can be used for filling a water tank in a caravan or motorhome where the water is to be used for washing, cooking or sanitation purposes.

Restricted use: Filling or maintaining a domestic pond (manmade or natural) using a hosepipe.

Exception: Filling or maintaining a domestic pond in which fish or other aquatic animals are being reared or kept in captivity.

Restricted use: Filling or maintaining an ornamental fountain (including a cascade or any other display of moving water, and includes filling by permanent plumbing).

Exception:

- 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
- Ornamental fountains within places of worship or community ornamental fountains can be filled when they are used as part of a religious ceremony.

Restricted use: Cleaning walls, or windows, of domestic premises using a hosepipe.

Exception:

- Using a hosepipe to clean the walls or windows of domestic premises for health or safety reasons
- A hosepipe can be used where cleaning apparatus is not connected to mains supply.

N.B. For clarity: Electric pumps that are connected to water butts filled by rainwater are not covered by the restrictions. A hosepipe can be used to clean the walls and windows of domestic premises where this is done by a business as a service to customers.

N.B. For clarity: the use of water-fed poles by commercial cleaners for window cleaning at height is permitted under the H&S Statutory Exception. The domestic use of a water-fed pole is not permitted under TUB.

Restricted use: Cleaning paths or patios using a hosepipe.

Exception:

- Using a hosepipe to clean paths or patios for health or safety reasons

- A hosepipe can be used where cleaning apparatus is not connected to mains supply.

N.B. For clarity: electric pumps that are connected to water butts filled by rainwater are not covered by the restrictions.

- A hosepipe can be used as part of the process of preventing or controlling the spread of non-native and/or invasive species, where cannot reasonably be done using other preferred means.

- A hosepipe can be used to clean the paths or patios of domestic premises where this is done by a business as a service to customers.

N.B. For clarity: the use of water-fed poles for cleaning at height is permitted under the H&S Statutory Exception. The use of water fed pole for domestic use by a householder is not permitted.

Restricted use: Cleaning other artificial outdoor surfaces using a hosepipe

Exception:

- Using a hosepipe to clean an artificial outdoor surface for health or safety reasons
- A hosepipe can be used where cleaning apparatus is not connected to mains supply.

N.B. For clarity: Electric pumps that are connected to water butts filled by rainwater are not covered by the restrictions.

- A hosepipe can be used as part of the process of preventing or controlling the spread of non-native and/or invasive species, where cannot reasonably be done using other preferred means.

- A hosepipe can be used to clean artificial outdoor surfaces of domestic premises where this is done by a business as a service to customers.

N.B. For clarity: the use of water-fed poles for cleaning at height is permitted under the H&S Statutory Exception. The use of water fed pole for domestic use by a householder is not permitted.

A full list of activities considered to be Non-Statutory Exceptions are published on the United Utilities website here: [URL]

Representations

Representations concerning any of these prohibitions may be made in writing by [DATE] to [NAME OF PERSON] at [ADDRESS]. If, as a result of any representations, United Utilities Water Limited 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.

Further details concerning the prohibitions and actions concerning the current drought may be found on [NAME OF WATER COMPANY'S WEBSITE] at [LINK OF WATER COMPANY'S WEBSITE].



Visit unitedutilities.com to check if your postcode area is affected

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington
WA5 3LP
unitedutilities.com



Water for the North West