

Revised Draft Drought Plan

2022

Appendix H: Non-public water supply



1 Introduction

The Environment Agency's Drought Plan guidance¹ requires water companies to include in their plan if and how they will supply people, businesses and farms that rely on their own water sources for essential uses such as drinking and watering livestock, should their own supplies fail.

This document outlines United Utilities' policy and the approach that it has taken to arrive at that policy.

United Utilities refers to people, businesses and farms that rely on their own water supplies as 'private supplies'. They can be served by private boreholes, streams, springs and surface waters. Water companies are not responsible for these supplies, with the responsibility lying with the relevant local authority.

¹ Water Company Drought Plan guideline, April 2020

2 Numbers of private water supplies

There are 5,551 private water supplies (PWS) in the North West, with over 3,000 of these in Cumbria. The proportion of these supplies that are large commercial, small shared domestic or single domestic is provided, in Table 1. This table also shows the North West England area compared to other parts of the country.

Table 1: Numbers of private water supplies by customer and geographical region²

Region	Large supplies and any size supply used in a public building or a commercial activity	Small, shared domestic supplies	Single domestic dwellings	Private distribution systems	Domestic purposes – other	Total	Percentage of England total
South West England	2511	1130	9079	49	5	12881	34
West Midlands	633	517	4968	12	2	6132	16
North West England	1109	1007	3445	14	16	5591	15
East of England	820	456	2817	42	33	4168	11
Yorkshire and Humberside	865	865	2824	4	0	4558	12
London and South East	384	350	1236	37	5	2012	5
East Midlands	212	159	803	12	1	1187	3
North East England	519	263	643	7	0	1432	4
England total	6901	4747	25815	177	62	37702	

This shows that United Utilities has the third highest proportion of private water supplies.

² Figures as found in DWI: Drinking water 2019 Private water supplies in England; <https://cdn.dwi.gov.uk/wp-content/uploads/2020/12/07081721/PWS-2019-England-1.pdf>

3 Guidance

There are three areas of guidance in place: two from the Drinking Water Inspectorate (DWI) and one from Defra:

- The Drinking Water Inspectorate: Proactive planning
 - Local authorities should have plans, procedures and frameworks in place for emergency situations which include arrangements for alternative supplies
 - Framework agreements should also be in place with water companies and include the type of assistance that is available and the circumstances where it will be applicable; local limitations; restrictions of availability; and the cost of provision

- The Drinking Water Inspectorate: 'Managing insufficiency of private water supplies 2017'³
 - The first port of call should be to refer to the relevant contingency plan; where this is not in place, advice should be sought from the local authority or water company
 - In this instance there is no obligation on either to provide an alternative supply of water except where the local authority considers circumstances to pose a danger to life or human health. Where the local authority believes this is the case they have powers to require, if practicable, the local water company to supply water at reasonable cost for a period as specified by the local authority. These services can be charged for and costs recovered from the relevant person(s) to which the supply is provided

- Defra: 'Security and Emergency Measures Direction' (SEMD)⁴
 - For extended periods of beyond 5 days, an increased provision to 20 litres/head/day will apply

United Utilities has taken into account these areas of guidance when arriving at its policy.

³ <http://dwi.defra.gov.uk/stakeholders/guidance-and-codes-of-practice/pws-alt-supplies.pdf>

⁴ [http://dwi.defra.gov.uk/stakeholders/guidance-and-codes-of-practice/SEMD%20\(LICENSED%20WATER%20SUPPLIERS\)%20DIRECTION.pdf](http://dwi.defra.gov.uk/stakeholders/guidance-and-codes-of-practice/SEMD%20(LICENSED%20WATER%20SUPPLIERS)%20DIRECTION.pdf)

4 Our Policy

United Utilities has guidance in place, 'Framework for provision of alternative supplies for Private Water Supplies,' 2017, which has evolved since the first iteration in 2012. This has been communicated with local authorities through Public Health liaison routes.

The policy states:

- United Utilities will provide an alternative supply for up to 72 hours free of charge (usually bottled water) in emergency situations where we receive a request from a local authority, to give residents time to find an alternative supply. If United Utilities is approached directly, the same service will be provided and the relevant local authority informed
- We can provide bowsers by exception if formally requested by local authority
- The quantity of water provided will be up to a maximum of 10 litres/person/day, irrespective of United Utilities' own resource position
- Only water for domestic use will be provided. Non-domestic requests will not be actioned. However, discretion will be exercised in the event of threat to the health of livestock
 - For example water was delivered to cattle farmers in the 2018 drought
- Our aim is to deliver water to the affected property within 24 hours of a request from a local authority
- If not classed as an emergency the framework states we will not be able to assist
- In situations where the local authority has identified a longer term issue which poses a danger to life or health, the framework states that United Utilities should be contacted to discuss the circumstances on a case by case basis. Further details can be found in the escalated requests/notices section below
- Our framework also states that "our main priority has to be using our equipment, bottled water stocks and resources for maintaining supplies to our customers"

It is noted that SEMD guidance also recommends provision is increased to 20 litres/person/day after 5 days. This will be dealt with under the escalated requests/notices provision.

4.1 Escalated requests/notices

As per the DWI guidance, local authorities can request supplies for extended periods where circumstances pose a danger to life or human health. In these instances:

- Requests should be referred to the Public Health team for assessment
- We will:
 - Check if a notice has been served
 - Consider each request on a case by case basis
 - Discuss other options, and provide assistance in terms of alternative suppliers (however it must be noted that there are competition law implications, so any discussions should be broad with no recommendations given)
 - Agree duration of extension required
 - Review practicality of any assistance being provided in light of latest event and resource information
 - Agree cost of service
- Bottled water is still the preferred option for extension, however this must be reviewed alongside the practicalities of location, duration and severity of public health risk.

4.2 Fire service commitments

United Utilities will fulfil its obligations in the provision of water for fire and rescue services. During incident response, this is achieved through liaison between partners at the appropriate level to share information about incident scale and response options. This can be achieved via direct contact between operational or tactical staff, or between the Integrated Control Centre (ICC) and Fire Control. This liaison can implement a range of operational responses that could include drawing from impounding reservoirs, drawing from adjacent district metered areas (DMAs), or the deployment of alternative supply vehicles to directly feed into fire service appliances. Such actions can assist in mitigating customer impacts of poor pressure, no water or discoloured water.

Further, in 2020 United Utilities proactively established an 'Operational Liaison Group' with all six of the fire and rescue services in our supply area, the objective being to:

- Support each member organisation towards their compliance with relevant legislation through collaboration, information sharing and cooperation. Legislation within the scope of the group is the:
 - Fire and Rescue Services Act 2004
 - Civil Contingencies Act 2004
 - Water Industry Act 1991
 - National guidance document on the provision of water for fire-fighting 2007
- Develop and maintain a 'Memorandum of Understanding for Incident Response'.
- Ensure that arrangements are in place to ensure effective and proportionate incident response.
- Facilitate information and data exchange in incident/emergency planning and response.
- Ensure that learning from incidents/emergencies is maximised.
- Explore opportunities for innovation and alternative approaches to incident response, training and exercising.

This Operational Liaison Group can consider incident response strategies for use in a drought scenario, and early indication has been that the use of final effluent as a source of fire-fighting water is a subject that the group members wish to explore, which may be relevant to drought scenarios.