River Test Stage 0.1 Drought Order Application

1.4 Evidence That Southern Water Has Followed Its Drought Plan

18th July 2025

from Southern Water

Table of Contents

1 Introduction 3
1.1 The Drought Order application documents **Error! Bookmark not defined.**
1.2 Objectives of this document 3
2 The Drought Plan and the Section 20 Agreement 4
2.1 The Drought plan 4
2.2 The Section 20 Agreement 7
3 How Southern Water Has Followed Its Drought Plan and the Section 20 Agreement 10
3.1 Water resource situation monitoring 10
3.2 Environmental monitoring and mitigation 11
3.3 Water efficiency, communications and customer engagement 12
3.4 Implementation of TUBS 15
3.5 Leakage management 18
3.6 Management of outage 23
3.7 Other actions and consequences of the drought order 27
3.8 Summary of actions in line with the drought plan 29
References 30

List of Tables

Table 1: Drought management actions that are expected in the S20 Agreement (ref 1-5)……...7
Table 2: Drought management actions that are expected in the S20 Agreement under the Candover Augmentation Scheme (River Itchen)…… 8
Table 3: The Drought Order process timeline……...8
Table 4: Drought permit process timeline following the 35-day trigger as in the S20 agreement…… 8
Table 5: Outage performance (Ml/d) for Hampshire and the Isle of Wight in June 2025, using WRMP calculation procedure……..24
Table 6: Outage definitions by category……..
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List of Figures

Figure 1: Linking drought triggers and actions…..... 6
Figure 2: Hampshire Leakage Dashboard..... 20
Figure 3: Leakage levels for Hampshire water resource zones. 21
Figure 4: Isle of Wight Leakage Dashboard. 22
Figure 5. Outage performance since April 2025 for the whole company. 26

1 Introduction

Southern Water are applying for a Stage 0.1 Drought Order to make temporary amendments to the abstraction licence 11/42/18.16/546 to abstract water from the River Test. The purpose of this Stage 0.1 Drought Order application is to secure supplies for customers primarily within the Hampshire Southampton West (HSW) supply area, but also the need to maintain a minimum transfer of 12 Ml/d from HSW to the Isle of Wight (IOW) to ensure supplies can be maintained on the island.

1.1 Objectives of this document

This document demonstrates that Southern Water has managed its operations appropriately during the preparation and application for this Stage 0.1 Drought Order for the River Test and is ready for operation within it. Southern Water has:

- Followed its published drought plan;
- Engaged customers and enhanced water efficiency promotion;
- Enhanced leakage reduction activity;
- Effectively managed outage;
- Considered other options and risks; and
- Considered, prepared, and appropriately implemented water use restrictions with respect to the Hampshire Section 20 Operating Agreement (S20) agreed with the Environment Agency (EA).

2 The Drought Plan and the Section 20 Agreement

2.1 The Drought plan

Southern Water's current Drought Plan (DP19) (Southern Water, 2019) was published on 1st July 2019. In June 2021, an updated 2022 draft Drought Plan (dDP22) (Southern Water, 2022) was sent for consultation over a period from 7th June to 2nd August 2021. Responses were received from 26 individuals and organisations, as well as feedback from webinars, customers and other engagement. On 28th September 2021, Southern Water published a statement of response, which explained how comments received on the draft plan were to be addressed.

Since the consultation, Southern Water have made several changes to the dDP22 in response to regulatory feedback. The draft plan was submitted to the regulators for comment in May 2022, September 2022 and February 2024. Following a letter received from Defra on 21st August 2024, additional changes were made to the dDP22 and it was submitted for approval in January 2025. The dDP22 currently awaits agreement from the EA and Defra before final publication.

The DP19 and dDP22 refer to the sequencing of Drought Permits and Orders under the S20 Agreement with the EA. This agreement outlines the steps Southern Water must follow during droughts to meet its supply duties under Section 37 of the Water Industry Act 1991, including actions related to the River Test.

The S20 Agreement, DP19, and dDP22 envisage that Southern Water will apply for a Drought Permit to abstract below the Total Test Flow (TTF) Hands-off Flow (HOF) condition of 355 Ml/d down to 265 Ml/d (Drought Action 4). Thereafter, in the event of continuing drought, Southern Water is to apply for a Drought Order down to 200 Ml/d (Drought Action 6).

It was originally considered that the application for this HOF relaxation could be made by way of an application for a Drought Permit (consistent with the Section 20 Agreement – Drought Action 4). However, subsequent to the Section 20 Agreement, the conclusion of the Stage 2 assessment was that "*no adverse effect on integrity cannot be concluded for the River Itchen SAC, even with mitigation in place*". In consequence, consistent with the EA's guidance and advice, it was considered that an application should be made to the Secretary of State for Environment, Food and Rural Affairs for a Drought Order in relation to the proposed HOF relaxation, having considered imperative reasons of overriding public interest and provided compensation.

Therefore, Southern Water has applied for a Drought Order to lower the HOF, as opposed to Drought Permit. This approach that has been taken in light of the EA's guidance and advice and is the approach that has been assessed in the Habitats Regulations Assessment - Report to inform an assessment under Regulations 63 and 64 of the Conservation of Habitats and Species Regulations 2017 (Ref No. UK0028294.1948_R001.2, WSP, July 2025). Overall it is concluded that there are no feasible alternative solutions to the Proposed Stage 0.1 Drought Order. The draft Drought Permit and Drought Order HRAs are included within this application as ***Document 2.4a Testwood Drought Permit HRA and Document 2.4b Testwood Drought Order HRA,*** and a proposed suite of mitigation and compensation measures has been included within ***Document 2.2 Monitoring and Mitigation Plan*** (and appendices) and ***Document 2.3 Section 20 Monitoring and Mitigation Progress***.

This Stage 0.1 Drought Order application follows Southern Water's current published Drought Plan (DP19) and dDP22, except for Drought Action 4 under the S20 Agreement, as Southern Water is applying for a Drought Order rather than a Drought Permit. Where applicable, protocol under the S20 Agreement has been followed.

The S20 protocol is applied consistently in both the current and new draft drought plan, with corresponding procedures and actions relating to the River Test Drought Permit/Order. The only discrepancy between the

two drought plans is the river flow trigger levels that are used through the stages of the River Test Drought Permit/Order application, from internal preparation of the draft application to the final application. Flow triggers were originally developed for the DP19 and were subsequently updated for the dDP22 (Southern Water, 2022), which is currently awaiting feedback from the regulators. The new triggers are higher than the triggers developed for DP19 and are, therefore, more precautionary. They are designed to ensure that there is sufficient time to take action in advance of the licence condition being breached, as set out in the S20 agreement. Southern Water have therefore chosen to use the new dDP22 triggers to guide the preparation of this Stage 0.1 Drought Order application.

Expected actions within Southern Water's drought plan

The actions that Southern Water expect to take as the drought progresses are set out in **Error! Reference source not found.**. These actions are in line with the expectations set out in the S20 Agreement, as set out in Section 2.2 below.

Drought Level	Trigger Status	Drought Actions
Normal Conditions	▪ River Test Flows > 90 day Triggers	▪ Routine drought monitoring ▪ Normal Patterns of abstraction under Sustainable Abstraction Policy ▪ Normal Water Efficiency Actions ▪ On recovery conduct lessons learned review
	▪ River Test Flows < 90 day Triggers	▪ Begin River Test DP Internal Preparation
Level 1 Minor or developing drought	▪ River Test Flows < 60 day Triggers	▪ Increased Water Efficiency Messaging ▪ River Test Drought Permit Pre-Consultation with Environment Agency ▪ Reduce transfers out of HSW (to HSE, IoW) ▪ Increased leakage reduction activity in WRZ ▪ Activate Portsmouth Water Bulk Supply ▪ Engagement with Local Authorities
	▪ River Test Flows < 35 day Triggers	▪ Submit River Test Drought Permit ▪ Section 20 Annex 2 Timeline Activities ▪ Pre-consultation on River Test Drought Order (stage 1 – HoF to 265Ml/d) ▪ Begin River Test DO Internal Preparation
Level 2 Drought	▪ River Test Flow <=355 Ml/d	▪ Temporary Use Bans ▪ Mains pressure reduction management and Distribution Network Modifications ▪ Submit application for River Test Drought Order (Stage 1 – HoF to 265Ml/d) ▪ Pre-consultation and submission for Level 3 Phase 1 Restrictions Drought Order
Level 3 Severe Drought	▪ River Test Flows < 310Ml/d	▪ Implement Level 3 Phase 1 Restrictions Drought Order Restrictions ▪ Pre-consultation for River Test Drought Order (HoF to 200Ml/d) ▪ Submit River Test Drought Order (Stage 2 – HoF to 200Ml/d) ▪ Pre-consultation and submission for Level 3 Phase Restrictions Drought Order
	▪ River Test Flows < 265Ml/d	▪ Implement Level 3 Phase 2 restrictions Drought Order ▪ Implement t River Test Drought Order (Stage 2 – HoF to 200Ml/d)
Level 4 Extreme Drought	▪ River Test Flows < 200Ml/d	▪ Emergency Drought Orders

Figure 1: Linking drought triggers and actions.

Note: although this figure is taken from the dDP22, the actions are the same as the current Drought Plan (2019).

2.2 The Section 20 Agreement

The S20 Agreement between Southern Water and the EA was signed in April 2018 as part of the public inquiry into the EA's proposed abstraction changes to Southern Water's abstraction licences on the River Test and the River Itchen. A comprehensive summary of the S20 Agreement is provided in document ***1.1_App 3 Summary of the Section 20 Agreement.***

Expected actions under the S20 Agreement

A key element of the S20 Agreement is the expected sequencing of drought interventions in the River Test and River Itchen catchments, as shown in Table 1 and Table 2. These actions are intended to progress as a drought develops and becomes more severe. Following the optimisation of resources and the initiation of the bulk supply from Portsmouth Water to the Southampton East zone, Southern Water would look to escalate demand-side water efficiency measures.

A Drought Permit for the Testwood Surface Water abstraction on the River Test is expected to be the earliest formal supply-side drought measure in Hampshire. The Drought Permit is to be implemented following the imposition of level 2 water restrictions (temporary use bans (TUBs)). The S20 requires that restrictions are implemented before the Permit comes into effect (Table 3 and Table 4). However, as explained in Section 2.1 above, this application is for a Stage 0.1 Drought Order (not a Drought Permit), but for the same level of abstraction as envisaged under the S20 Agreement under Drought Action 4. As the EA has advised that the dispensation allowed under the Section 20 Agreement would not be applicable for the River Test Stage 0.1 Drought Order, Southern Water has decided to introduce TUBs at the point of application for, rather than implementation of, the Stage 0.1 Drought Order. More information on this decision has been provided in Section 3.4.

The Section 20 Agreement also assumes that Southern Water would apply for a Drought Order to implement non-essential water use bans (NEUBs) as the next step in a worsening drought situation once the Test Drought Permit has been granted and implemented. More information can be found in Section 3.5.

Table 1: Drought management actions that are expected in the S20 Agreement (ref 1-5).

Ref	Activity	Comment
1	Utilisation of Southern Water sources and bulk supplies	Prior to any application for a drought permit or order, Southern Water will utilise its own existing water sources available to supply the Hampshire and the IOW Water Resource Zones within the terms of their respective licences. This will include water available under the Portsmouth Water bulk supply scheme.
2	Level 1 water use restrictions	Escalate demand-side water efficiency measures including media campaigns.
3	Level 2 water use restrictions	Implement TUBs pursuant to section 76 IA 1991 unless it is agreed with the Environment Agency that it is unnecessary because savings will be minimal.
4	Test Surface Water Drought Permit	Abstract from Test Surface Water below the Environment Agency's proposed TTF HOF of 355 Ml/d down to 265 Ml/d pursuant to a drought permit.
5	Level 3 water use restrictions	Apply for a drought order to authorise partial Non-Essential Use (NEU) restrictions (Level 3 phase 1 drought restrictions).

Table 2: Drought management actions that are expected in the S20 Agreement under the Candover Augmentation Scheme (River Itchen).

	Candover augmentation scheme	Test Surface Water drought order	Level 3 phase 2 drought restrictions	Lower Itchen drought order
6	When flows fall below 205 Ml/d at Allbrook and Highbridge on the River Itchen	When TTF falls below 265 Ml/d abstract down to a baseline of 200 Ml/d pursuant to a drought order	When flows fall below 200 Ml/d at Allbrook and Highbridge implement full TUBS and NEUs (Level 3 phase 2 drought restrictions).	When flows fall below 198 Ml/d at Allbrook and Highbridge, as a measure of last resort, abstract below the 198 Ml/d HOF to a floor of 160 Ml/d. Coincident with this, Portsmouth Water will also need to abstract below the Riverside Park HOF of 194* Ml/d.

Table 3: The Drought Order process timeline.

Timeframe	Action
Become application-ready to meet forecasts	Pre-application stage
Day 0	Serve notice of the application to the Environmental Agency
	Publish notice of the application in one or more local newspapers within the affected area and the London Gazette
	Submit the application to the Secretary of State
	Submit notice of a proposed habitats regulations assessment derogation to the Secretary of State
Day 7	7-day consultation period ends
Between Day 7 and Day 28	Potential Hearing or Public Inquiry
	Hearing Report
Day 28, or 7 days after the Hearing Report is published	Determination by the Secretary of State (including in respect of the proposed derogation to the Secretary of State)
As soon as possible	Publish Drought Order
	Implement Drought Order

Table 4: Drought permit process timeline following the 35-day trigger as in the S20 agreement.

Number of days after 35-day trigger is breached*	Action
0	The Company applies to the Agency, publishes the last advertisement of application (if more than one advertisement is required) and gives notice of hearing on day 11.
1-2	The Agency acknowledges receipt, contacts PINS/EA officer from another area/Counsel, and secures potential venues

Number of days after 35-day trigger is breached*	Action
7	Deadline for any objection
8-9	The Agency decides if a hearing is necessary
11	Hearing (into non-ESOR matters). Hearing adjourned.
15	The Company gives ESOR update (could be day 16 or 17)
19	Reconvened hearing on ESOR
25	Latest date for the Agency to receive the report on application.
29	The Agency uses reasonable endeavours to issue a decision whether to grant a drought permit
34	Agency's decision on whether to grant a drought permit (long stop)
35	The permit is implemented if flows fall below 355 Ml/d on the River Test and the Company continues abstraction.

***Note the 35-day trigger for the Drought Permit application is based on a 'worst-case' assessment of flow recession. The recession may be slower, or subsequent rainfall events may delay the recession. The day on which the 355 Ml/d HOF condition is breached may therefore occur after 35 days, or not occur at all, depending on subsequent rainfall in the catchment. However, it is also possible that flows could recede faster than expected by the 35-day trigger.**

3 How Southern Water Has Followed Its Drought Plan and the Section 20 Agreement

3.1 Water resource situation monitoring

Southern Water has been monitoring the water resources situation in the River Test catchment by analysing various metrics, including rainfall, river flows and groundwater levels. The data is presented in Section 3 of document ***1.2 Reasons for the Order,*** and document ***1.3 ESOR Case*** where drought progression forecasts are also included. These forecasts are based on weather forecasts available for the short term (two weeks ahead), together with climatic ensembles for medium-term forecasts. Hydrological models have also been used in conjunction with these forecasts to assess the potential impacts of further dry weather on river flows and available resources in the catchment. Southern Water has also assessed the risk of supply shortfall to customers, with the focus of the Stage 0.1 Drought Order on the continuation of public water supply in the event of continued dry weather conditions.

Triggers

As described in Section 2.1 of this document and Section 3.3 of the document ***1.2 Reasons for the Order***, Southern Water has developed new river flow triggers for the dDP22 in alignment with the requirements of the S20 agreement.

There are three main flow trigger levels on the River Test, which guide actions in advance of the implementation of a Drought Permit or Order. For the purposes of this Stage 0.1 Drought Order application, the River Test flow triggers are based on the Drought Permit triggers as set out in dDP22, rather than Drought Order triggers from the dDP22, as the Order triggers were created for a full Stage 2 Drought Order application. The three triggers are:

- The '60-day' trigger for initiating the pre-consultation of the drought permit and provision of draft application documents.
- The '35-day' trigger for submission of the application for the permit.
- Also, a '90-day' trigger, which is an internal trigger for Southern Water to start preparing for the pre-application phase.

The timeline for a Drought Order application is set out in Table 3. Southern Water is currently following this process for the 2025 Stage 0.1 Drought Order application for the River Test, as set out under Schedule 8 of the WRA 1991 and relevant EA guidance[1].

Drought progression

The 90-day River Test flow trigger was first crossed on Sunday 15th June 2025. In response, Southern Water started preparing for a Stage 0.1 Drought Order application and informed the EA and Natural England (NE) on Monday 16th June 2025. The first "pre-application" meeting was scheduled for the 24th June, suiting EA and

[1] https://www.gov.uk/guidance/drought-plans-environmental-assessment-and-monitoring#write-your-environmental-monitoring-plans

NE availability, which initiated a weekly cadence of meetings between Southern Water and the EA and NE that is ongoing. The 60-day trigger (dDP22) was then crossed on Sunday 29th June 2025.

Southern Water activities planned between crossing the 60-day trigger and reaching the 35-day threshold include:

- Setting out a schedule through to application submission, the EA's period of determination of the application, and the implementation of the Stage 0.1 Drought Order and TUBs.
- Alert stakeholders to the pre-application period and advise them of the further process and their opportunity to participate, offering engagement (this commenced ahead of passing the 60-day trigger).
- Enhanced promotion of water efficiency.
- Deploying enhanced resource targeting to further reduce network leakage.
- Preparing operations to minimise the required abstraction at Test Surface Water (Testwood abstraction), while considering the consequent impact on the River Itchen.

Southern Water will continue to monitor the River Test flow, the wider hydrological and weather situation, and local and regional water demand. Forecasts will be regularly updated in dialogue with the EA. At the time of this application, the recent exceptionally hot weather is persisting and water demand remains high, with consequent need to continue higher than usual abstraction from the River Test (the scale of the recent temperature increase and its effect on water demand has far out-weighed the reduction of demand possible by Southern Water's promotion of efficient, environmentally considerate use of water). If the weather returns to more normal temperatures and demands fall back to more normal levels, Southern Water will also be able to reduce the abstraction to more usual levels, and the river flow should recover some of the most recent large drop. However, if the current situation continues, the actions scheduled for the next month will likely be brought forward to ensure continued supply to the HSW and IOW areas, including the timings related to TUBs.

3.2 Environmental monitoring and mitigation

A suite of environmental assessment documentation has also been included as part of this Stage 0.1 Drought Order application. These documents have been prepared in line with UK Government guidance in relation to Drought Permits and Drought Orders and are consistent with the environmental assessment, monitoring, and mitigation plans supporting the DP19 and dDP22.

The mitigation/compensation packages defined for the Itchen and Test related drought options were defined based on an understanding of the status of the River Itchen SAC interest features at the time and thus it was agreed that delivery of the mitigation/compensation defined in the packages would be sufficient to avoid adverse effects on the SAC related to the expected drought applications. However, as a result of the Stage 2 Appropriate Assessment (AA), it not possible to conclude there will be no adverse effect on site integrity for the River Itchen SAC. Therefore, Southern Water has been working on an enhanced list of mitigation and compensation measures for this Stage 0.1 Drought Order that will be implemented to offset the potential effects.

The 2025 monitoring and mitigation plan (document ref: ***2.2 Monitoring and Mitigation Plan*** and appendices) submitted with this Stage 0.1 Drought Order application focuses on the environmental monitoring and mitigation to be carried out during the period of the Drought Order/Permit. It is complementary to the permanent (baseline) monitoring and permanent mitigation work packages agreed with the EA and NE and implemented for the S20 in 2018. These agreed work packages are also appended to this Stage 0.1 Drought Order application as document ref: ***1.1 App 4 Monitoring Plan*** and ***1.1 App 5 Mitigation Plan***. These permanent measures provide the primary monitoring and mitigation approach for the River Test when a Drought Order/Permit has been implemented.

3.3 Water efficiency, communications and customer engagement

Southern Water has a history of proactive industry-leading activities in respect to customer demand management, which help reduce pressure on the water supply network, particularly in times of drought. This section gives further information on the types of activities that Southern Water have instigated, including forging community partnerships, promoting water efficiency and educating water users.

Some of the actions that have been initiated are given below:

- Implemented a domestic customer metering programme between 2010 and 2017 and has pursued further metering since 2017; the Western Area is now 91% metered. The latest smart metering programme will commence in AMP8 (2025 – 2030).
- Southern Water's industry-leading water efficiency target programme 'Target 100' focuses on changing customer behaviours on water consumption to reduce it an average of 100 litres per head by 2040.
- Ran an annual water efficiency behaviour change campaign. The 2024 campaign, titled 'Make One Change', targeted 775,000 households across four water-stressed areas with engaging messaging and guidance to elicit simple behaviour changes to reduce their daily water usage. The campaign ran from April to September and combined traditional and digital media channels, including TV, radio, Out of Home advertising (OOH), social, and warm email, to reach the four customer segments most likely to be receptive to these messages. Programmatic media buying across the summer period ensured campaign messages were only delivered when it was over 20 °C and not raining.

The campaign delivered 98 million impressions across all media types and 60,000 website sessions. Of customers who were aware of the campaign, 70% claimed they took action to reduce their water consumption as a result of campaign activity, and a 10% increase in customer satisfaction from those aware of the campaign.

Forging community partnerships

Southern Water has continued its proactive approach to encourage customers to use water wisely. The following activities have been used to communicate key messages:

- Securing strategic media coverage including pieces with: BBC South Today, BBC News, Independent, Portsmouth Today, BBC Sussex, Andover Advertiser, Jeremy Vine FIVE and ITV Meridian.
- Drumbeat of organic social media posts highlighting ways to save water, Southern Water's leakage efforts and business partnership case studies.
- Targeted social media adverts encouraging water-saving activities targeted to customers in Hampshire and the IOW.
- Face-to-face events, including an IOW stakeholder briefing event and a customer 'Your Water Matters' event on the IOW.
- Regular customer emails (targeted for customers in Hampshire and the IOW) ramping up the messaging to highlight the threat of restrictions if river levels continue to drop and demand does not go down.
- Regular emails to non-household (NHH) customers issued to retailers in Hampshire and the IOW, following similar messaging to the customer emails.
- Regular emails to stakeholders in Hampshire and the IOW, following similar messaging to the customer emails.

- Local press campaign targeting customers in Hampshire and the IOW, including social media advertising, advertorials, printed adverts, sponsored content and digital display.
- Events with non-government organisations (NGOs) such as Rivers Trust, Test & Itchen Association, Wild Fish, EA and local authorities to brief them on river levels and what Southern Water are doing to mitigate the impact. During these events, Southern Water has asked for their support in sharing these messages.
- Briefing event with local members of parliament (MPs) to ask for their support in sharing water-saving messages and discussing any efforts to mitigate the impact.

From July 2025, Southern Water will be stepping up a multi-channel marketing campaign designed to reach customers in Hampshire and on the IOW, designed to:

- Engage - Continue a dialogue with customers, highlighting issues such as consumption and scarcity, having more regular contact, and keeping them informed.
- Explain - Why they need to act and help customers understand the things they can do.
- Assist - Highlighting the different ways customers can save water, and the potential savings both in litres and pounds.

The campaign will use a broad mix of channels, including TV/radio advertising, door drops, digital (including sponsored online content and social media advertising), email, and OOH media, to achieve the objectives set out below:

- Promote water efficiency and encourage customers to adopt water-saving behaviours through targeted messaging.
- Highlight Southern Water's efforts and showcase initiatives such as reducing leakage, infrastructure projects (reservoirs, water recycling), and long-term solutions to secure water supplies.
- Implement a gradual approach to messaging, in line with the drought warning plan, to avoid stakeholder fatigue and ensure support for behaviour changes when most needed.
- Build advocacy by providing stakeholders and customers with timely updates and communications to amplify water-saving messages.
- Educate audiences on the importance of chalk streams and the impact of abstraction licenses, emphasising the need for responsible water use.
- Develop and execute communication plans for potential TUBs, ensuring customers and stakeholders are informed and engaged.
- Prioritise digital-first communication methods, including emails, text messages, and social media, to reach customers effectively.
- Drive Awareness around the lack of rainfall to generate urgency and encourage water-saving behaviours across all audience groups.

Water efficiency

Water efficiency home visits

Southern Water has a targeted long-term programme of free water-saving home visits across Hampshire. These are open to metered customers to request a visit who fit the high usage criteria and who are expected to benefit most from a visit.

Each visit is designed to offer bespoke behaviour change advice alongside fitting of free water-saving products throughout the house to ensure maximum water and energy savings for the customer. Each visit involves tracking of actual water use both before and after the visit. Visits have demonstrated reductions in water usage

just from the behavioural advice given. Free fixing of leaky loos is also included within the home visits, which can save up to 300 litres/day per toilet.

The Home Visit programme will continue throughout AMP8 and further investment has been allocated in Hampshire South from June this year, allowing for an additional two engineers in this region for the next 6 months.

Water efficiency for local schools and businesses

Southern Water have also been offering water-saving visits to local schools and businesses since April 2024. The visits include fixing leaky loos, taps, showers, etc. and/or fitting water-efficient devices as well as recommending other water efficiency improvements such as rainwater harvesting. From April 2024 to Mar 2025, 317 visits were carried out, which resulted in an assumed saving of 1.67 Ml/d. Further investment in this programme has been provided in the IOW and Hampshire from June this year, expected to save an additional 3 Ml/d in these areas alone.

Business Partnership Fund

Southern Water set up a fund in September 2023 to enable pilot projects that test novel approaches to reducing water usage in the business sector. It focuses on real-world applications of innovative solutions and behaviour-change techniques to cut consumption. To date, a total of 20 projects have been funded across a range of sectors using a variety of technologies. Projects have included Rainwater Harvesting at a local Country Centre for toilet flushing and irrigation, water recycling stations provided for a painting and decorating company and waterless urinals at a caravan park. The fund hopes to test and trial a variety of methods with different industries and produce Case Studies to encourage businesses to adopt successful methods.

Other water efficiency measures

Southern Water has also been exploring other related packages that expand both the reach of the programme and how customers relate to their water use to make it easy for them to save water, energy and money, as well as protect their local environment. These activities have included working closely with local authorities, communities, parish councils and other stakeholders such as the Wildlife Trusts.

Water Saving Kits

Southern Water are co-developing a new suite of water-saving kits for domestic customers. The focus is on user-friendly, appealing designs that encourage adoption and maximise in-home water efficiency. The Water Saving Kits will focus on both practical products that can be easily fitted/used by the customer and on creating awareness and encouraging behaviour change.

Three prototypes are currently under review, aimed at different customer segments: ‘The Family Box’, ‘The Individual/Couple Box’ and ‘The Gardener’ box, with a path toward production and distribution from August 2025 onwards.

Water Calculator

Southern Water is exploring digital tools that make water efficiency engaging and accessible, and is in the process of developing a personalised water usage calculator. This personalised tool will replace the current water calculator (accessible on Southern Water’s website), improving the user experience to increase uptake and better link this tool to the wider campaign and opportunities for further engagement with customers. Southern Water will also be exploring a virtual home audit platform. These tools aim to increase household awareness and drive sustained behaviour change.

Behavioural Insights

Southern Water is working with the Behavioural Insights Team (BIT), who are leading experts in applied behavioural science, to develop a roadmap of new, effective and evidence-based solutions that can help to change customers' behaviour around saving water. This focused project aims to develop a range of customer-facing initiatives for reducing consumption in the home. These initiatives will go beyond existing campaigns, engaging customers with specific behaviour change interventions, for example, direct communications and products aimed at reducing the volume of outdoor hose use, and trialling new messaging to motivate customers to reduce their hot water use.

Education

Southern Water is working in partnership with Hampshire and the IOW Wildlife Trust Watercress and Winterbourne team in the seven headwater catchments of the River Test and Itchen to develop their 'Save Every Drop' education project. The five-year Lottery-funded project will raise awareness of the connection between water usage and the flows and health of the local chalk stream by encouraging and promoting the reduction of water usage.

Working closely with schools

In March 2023, Southern Water launched the New Wave Schools Education Programme, which includes T100/water efficiency and "Water for Life Hampshire" (WfLH) education. The programme includes:

- Funded lessons, assemblies and downloadable material for teachers.
- Workshops for uninformed and youth groups.
- 'Our River Our Water' funded outdoor learning 'on the river' sessions, delivered by Wessex Rivers Trust.
- Waterworld funded sessions at Testwood Education Centre, delivered by Hampshire and the IOW Wildlife Trust.

In the 27 months since the launch of the New Wave Schools Education Programme (March 2023 - June 2025), Southern Water has delivered 1,147 assemblies, lessons, workshops and outdoor learning sessions teaching 127,573 young people about where their water comes from and how simple water saving actions can help protect water resources and the environment that relies upon it.

3.4 Implementation of TUBS

Discussion of decision-making about the implementation of TUBs

Southern Water is regularly monitoring the evolving weather, hydrological and water supply-demand positions as the need to submit an application for a Drought Permit or Order is progressing. It has ensured that the advertising period required is accounted for prior to implementing a TUB and the deadlines required by different Media publishers. Southern Water's internal understanding of the geographical deployment options for TUBs has also been refreshed, including which supply boundaries should be considered and how these relate to Local Authority (LA) boundaries that will most likely be the best publicly understandable expression of implementation (Southern Water have sought to avoid the oddities of 'one side of the street being under [a restriction] and the other not'). Sufficient resourcing also needs to be ensured within the customer-facing departments (due to the significant additional contacts received in response to any announced customer impacts).

Southern Water will continue to liaise with neighbouring water companies about its situation and plans, and the implications of implementation for them. Short, medium and longer-term perspectives have been considered throughout as to the most appropriate approach, not least because the timing of implementation of TUBs is also an influence on their effectiveness.

Implementation of TUBs

Southern Water have an established operating position as governed by the S20 Agreement. Specifically, Drought Action 3 of Annex 1 states that Southern Water is required to implement partial TUBs (pursuant to Section 76 of the Water Industry Act 1991) not at the point of application, as per the EA National Guidance, but before a Drought Permit is implemented, i.e. when the HOF condition is crossed, seeking to avoid a requirement to implement TUBs too frequently.

Southern Water fully acknowledge the importance of implementing water-saving measures, such as TUBs, and recognise the guidance set out by the EA, which was reiterated to all water companies on the 28th May 2025. Having been advised by the EA that it would be necessary to apply for a Stage 0.1 Drought Order and that the dispensation allowed under the Section 20 Agreement would not be applicable, Southern Water has decided to introduce TUBs at the point of application for, rather than implementation of, the Stage 0.1 Drought Order.

River flows have been dropping at a faster rate than Southern Water's forecasting model initially indicated, exacerbated by frequent exceptionally high temperatures that cause increased evaporation and high demand. This has therefore made it incredibly challenging to implement TUBs in line with the submission of the Stage 0.1 Drought Order application. As discussed above, the process of implementing TUBs requires significant cross-functional planning and has a long lead time.

Therefore, it is unlikely that TUBs will be implemented on the exact same day as the Stage 0.1 Drought Order application is made due to the submission date being subject to actual river flow volumes; however, Southern Water will endeavour to initiate the TUBs process as close as possible to the submission of the Stage 0.1 Drought Order application. The implementation of TUBs will be announced on Wednesday 16th July 2025, with the restriction coming into force on Monday 21st July 2025.

Based on Southern Water's modelling on 9th June 2025, it was forecast that the 35-day trigger (to submit an application) would be crossed on 29th July. The timeline for introducing TUBs is therefore in line with the forecasting at the time. It is worth noting that Southern Water's model is, and has consistently been, indicating earlier dates than the model used by the EA.

Evidence of effectiveness of TUBs

Southern Water has assessed the potential benefits of TUBs, and demand saving figures are included in the DP19. The original assessment by Consultants Atkins in 2015-16 was updated, again by Atkins, in 2019-20. Their update was shared with the EA in draft, and the final report was also provided (Atkins, 2021). This is included as document ref: ***1.4 App 2 Effectiveness of Restrictions.***

Should TUBs be implemented, Southern Water will endeavour to determine its actual impact on the prevailing demand, though it must be recognised that this is a very difficult issue as there are many variables at play.

3.5 Implementation of NEUBs

Discussion of decision-making about the implementation of NEUBs

As a drought situation worsens, water companies can apply to the Secretary of State for Environment, Food and Rural Affairs to implement stage three water use restrictions (NEUBs) to further restrict water use, particularly of commercial activities. Southern Water are monitoring key metrics at both catchment and regional level, including river flows, rainfall, and supply-demand positions, and will continue to regularly monitor these metrics past the implementation of the Stage 0.1 Drought Order (if granted) to determine if stage three water use restrictions would be required to maintain water supply to the Southampton West water resource zone and the Isle of Wight. Southern Water is working closely with businesses and trade organisations to encourage them to proactively reduce their water usage, helping to postpone the need for restrictions that could otherwise disrupt their operations.

Implementation of NEUBs

The S20 Agreement expects that, once the Test Drought Permit has been implemented, the next step that Southern Water would take is to apply for a Drought Order to restrict non-essential water use (NEUB) in the case of a worsening drought situation. This is in line with national EA guidance, which states that NEUBs must be in place before applying for any further drought permit or order applications that may be more environmentally damaging. However, before applying for a Drought Order to restrict water use, water companies are expected to have fully exercised their powers regarding TUBs under the Water Industry Act (WIA) 1991, as stated in the Explanatory Memorandum to the Water Use (Temporary Bans) Order 2010: "*By extending the water uses that water undertakers may prohibit under section 76(1) of the Act [WIA 1991], water undertakers may be able to delay or avoid the need for drought orders under the Water Resources Act 1991*".

The potential timescales for introducing restrictions by recourse to a Drought Order for NEUBs are significantly longer than those for TUBs under the WIA 1991, and the Secretary of State may require a public inquiry or hearing to be held if an objection were received. Under Schedule 8, paragraph 3(c) of the WRA 1991, the company must publish a notice of its application for a Drought Order to restrict water use, which shall state that objections to the application may be made to the Secretary of State within seven days from the date on which it is served or published.

This application therefore includes an application for a Drought Order to restrict non-essential water use (NEUB) which may need to be implemented (if granted) prior to the implementation of a Stage 2 Drought Order to further lower the HoF condition below 265Ml/d.

Evidence of effectiveness of TUBs and NEUBs

Southern Water has assessed the potential benefits of NEUBs, and demand saving figures are included in DP19. These figures were calculated alongside TUBs by Atkins (2021), with the final report included in the Stage 0.1 Drought Order application as document ref: ***1.4 App 2 Effectiveness of Restrictions.*** Southern Water is also currently undertaking a cost benefit analysis for the implementation of NEUBs for 2025, which will be finalised in due course.

Similar to TUBs, if a decision is made to implement NEUBs after the Stage 0.1 Drought Order comes into effect, Southern Water will strive to evaluate their real impact on current demand. However, this remains a challenging task as there are many variables at play.

3.6 Leakage management

Southern Water has long had one of the Industry's lowest leakage levels, ranking 6th lowest in the Ofwat PR24 review of company performance (Ofwat, 2024) and has proactively set new challenges to reduce leakage further.

This includes setting itself the target of reducing leakage by 53% by 2050, ahead of the agreed targets via the National Infrastructure Committee (NIC); this will keep Southern Water amongst the very best in the industry in respect of leakage levels.

Leakage levels

Southern Water's leakage dashboard for Hampshire is shown in Figure 2. The leakage levels for each of the Hampshire water resource zones are in Figure 3 and the leakage dashboard for the IOW is in Figure 4.

The charts show that, in line with the company-level performance over the last 12 months, leakage has reduced in the Hampshire water resource zones consistently over the period and Southern Water are continuing to target reductions during the current regulatory year to significantly reduce the gap between reported leakage levels and the draft Water Resources Management Plan (dWRMP24) (Southern Water, 2024a) leakage targets.

Compared to the WRMP 2024 Annual Report (AR24; Southern Water, 2023), leakage in Hampshire over the last 12 months has reduced by almost 1 Ml/d or 3.2% and compared to the WRMP 2023 Annual Report (AR23; Southern Water, 2024b) by 1.7 Ml/d or 5.7%. The IOW has seen a 0.23 Ml/d (4.1%) reduction in leakage over the last 2 years, although it saw a small increase last year of 0.1 Ml/d (1.9%). As an average over June 2025, leakage in Hampshire is 4.3 Ml/d (14.0%) lower than it was in June 2024 and 1.7 Ml/d (26.8%) lower in the IOW.

Southern Water can provide regular leakage data updates to the EA during the drought order period.

Leakage management activities

Southern Water has actioned plans to enhance its leakage management activities in Hampshire and the Southampton area in response to the water availability position and the need for this Stage 0.1 Drought Order application. Current levels of Southern Water's framework's active leak detection resources are being maintained, but these resources are being supplemented through additional activities, as discussed below:

- An existing piece of work in the Winchester area is being extended using specialist leak detection contractors to sustainably deliver reductions in leakage in the water resource zone with the aim of recovering leakage levels to the dWRMP24 target levels. Additional detection resources are being sought that specialise in the use of acoustic loggers for detection surveys to increase the number of points of interest for detection resources to follow up.
- A trial has recently been completed on a no-dig solution for the repair of communication pipes to customer properties (the pipe from the connection point on the mains to the boundary box). The results are being reviewed and, if appropriate, the solution will be rolled out in the Hampshire zone and significantly reduce leak run times.
- Southern Water is offering free repairs to qualifying customers with supply pipe leaks to reduce the run times of leaks. This enhanced repair process has already been launched.
- A successful pressure management programme from AMP7 is being continued, and the initial programme phase is looking to target new schemes in the Hampshire area. Existing schemes are also

being reviewed for opportunities to further optimise pressure settings and further reduce leakage levels without compromising supply to customers.

- Sniffer dogs are being proposed to locate leaks, especially on the trunk mains network in rural areas where traditional leak detection techniques struggle due to the lack of available access to the pipework for either sounding or acoustic logging techniques.
- Finally, all the targets for the existing District Metered Area (DMA) estate in the Hampshire area are being reviewed to ensure they reflect best practice. As part of this piece of work, the size and make-up of the DMA is also being reviewed to understand if there are any opportunities to improve the layout and increase detection productivity as a result.

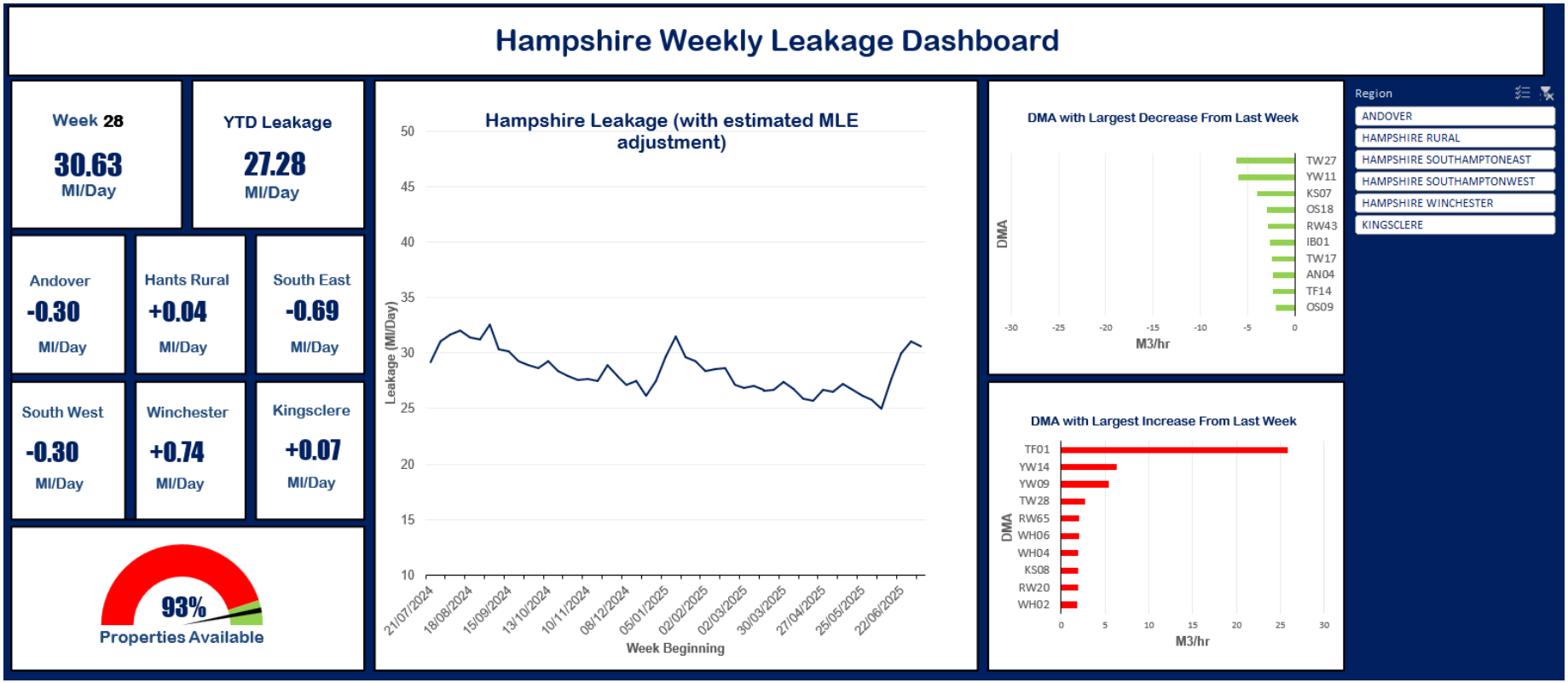

Figure 2: Hampshire Leakage Dashboard.

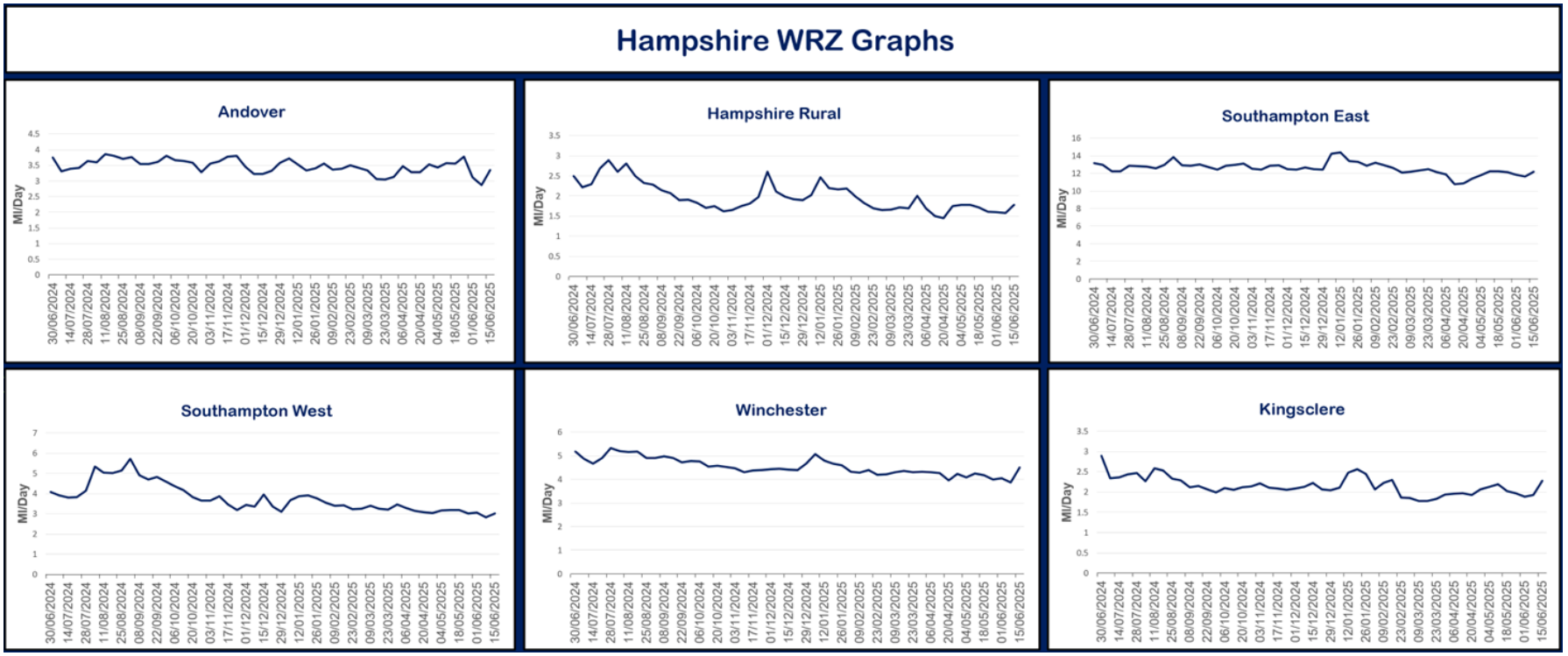

Figure 3: Leakage levels for Hampshire water resource zones.

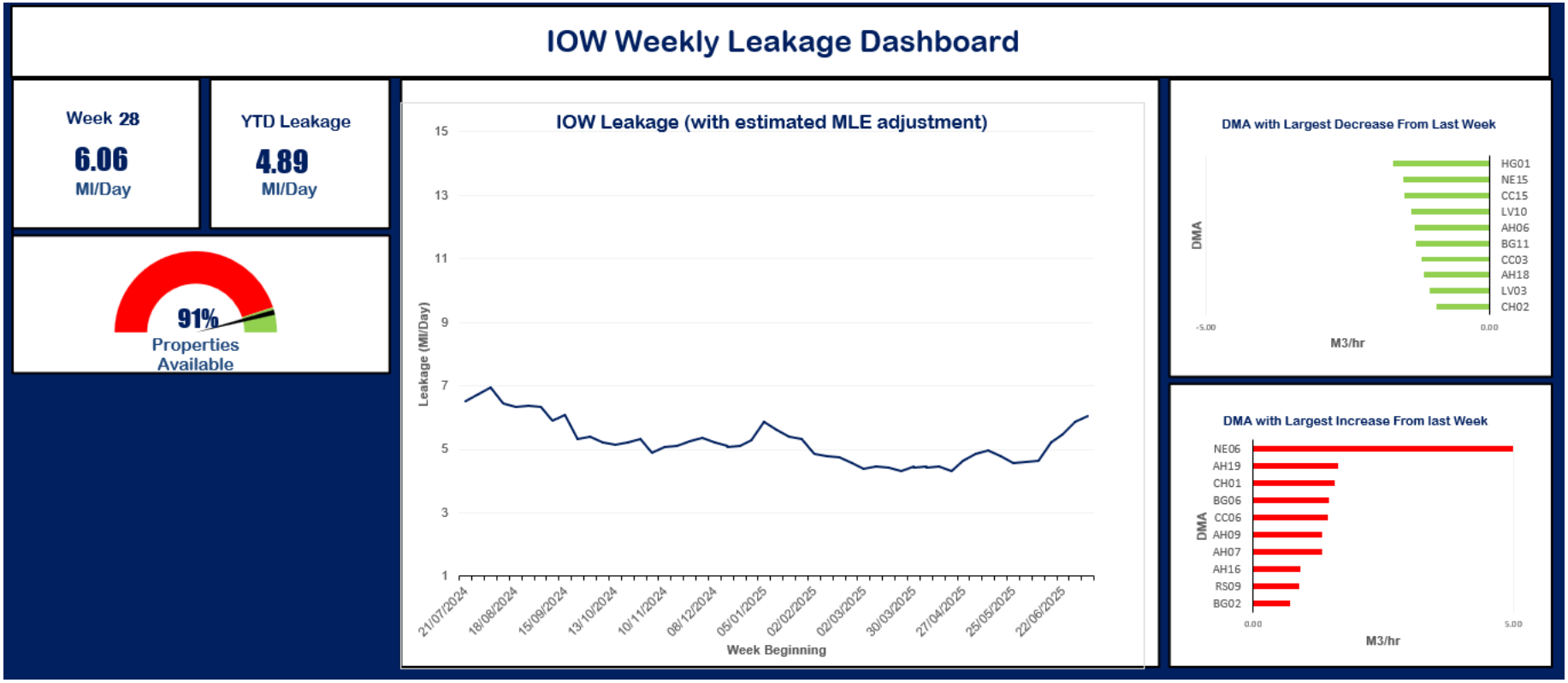

Figure 4: Isle of Wight Leakage Dashboard.

3.7 Management of outage

Southern Water has carried out a higher level of source outages than has been included (allowed for) in its plans over recent years. The overall position has been reported annually to the EA each year, with monthly updates being provided since 2021. Updates can also be provided during the 2025 Drought Order application process.

Outage during the drought

Source-by-source outage levels for June 2025 in Hampshire and the IOW are shown in Table 5 relative to expected deployable outputs (MDO) assumed within the WRMP supply-demand balance. The categories of outage included in the column in Table 5 are defined in Error! Reference source not found.**. Company-level performance is summarised in Table 6: Outage definitions by category.**

Outage Type	Definition
Ongoing Full	Full outage of site requiring capital scheme
Ongoing Partial	Partial outage of site requiring capital scheme
Reactive Asset	Full or partial outage of site due to asset failure requiring Operational response
Reactive Raw WQ	Full or partial outage of site due to raw water challenge e.g. turbidity
Planned	Full or partial outage resulting from asset(s) being taken out of service for planned maintenance
Requires Upgrade	Site is unable to achieve target deployable output although no failed asset(s)

Table 6: Outage definitions by category.

Outage Type	Definition
Ongoing Full	Full outage of site requiring capital scheme
Ongoing Partial	Partial outage of site requiring capital scheme
Reactive Asset	Full or partial outage of site due to asset failure requiring Operational response
Reactive Raw WQ	Full or partial outage of site due to raw water challenge e.g. turbidity
Planned	Full or partial outage resulting from asset(s) being taken out of service for planned maintenance
Requires Upgrade	Site is unable to achieve target deployable output although no failed asset(s)

for April, May, and June 2025. As of the end of June 2025, there was no operational outage on the IOW and only a partial outage at Otterbourne WSW in Hampshire, due to an out-of-service filter.

Table 5: Outage performance (Ml/d) for Hampshire and the Isle of Wight in June 2025, using WRMP calculation procedure.

WRZ	Source	Total (June 2025)	Ongoing Full	Ongoing Partial	Reactive Asset	Reactive Raw WQ	Planned	Requires Upgrade	Comments
IOW	Bowcombe	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IOW	Calbourne	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IOW	Carisbrooke	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IOW	Chillerton	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IOW	Knighton Chalk	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IOW	Knighton LGS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IOW	Niton	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IOW	Shalcombe	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IOW	St Lawrence	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IOW	Ventnor New	0.02	0.00	0.00	0.02	0.00	0.00	0.00	No current outage - from outage event post April 2025
IOW	Sandown	0.40	0.00	0.00	0.00	0.00	0.40	0.00	
HSW	Testwood	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HSE	Otterbourne Surface Water	11.99	0.00	0.00	11.99	0.00	0.00	0.00	Current outage - failure of inlet valve to filter, site flow limited
HSE	Otterbourne Ground Water	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HSE	Twyford Moors	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HSE	Twyford	0.38	0.00	0.00	0.00	0.38	0.00	0.00	Historic outage event post April 2025 - site flow was reduced for high nitrates
HW	Easton	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HW	Totford	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HW	Barton Stacey	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HSR	Horsebridge	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

WRZ	Source	Total (June 2025)	Ongoing Full	Ongoing Partial	Reactive Asset	Reactive Raw WQ	Planned	Requires Upgrade	Comments
HSR	Timsbury	2.09	0.00	0.00	0.00	2.09	0.00	0.00	No current outage - from outage event post April 2025
HA	Andover	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HA	Ibthorpe	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HA	Overton	0.02	0.00	0.00	0.02	0.00	0.00	0.00	Historic outage event post April 2025 - BH pump failure
HA	Whitchurch	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HK	East Woodhay	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HK	Kingsclere	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

Table 6: Outage definitions by category.

Outage Type	Definition
Ongoing Full	Full outage of site requiring capital scheme
Ongoing Partial	Partial outage of site requiring capital scheme
Reactive Asset	Full or partial outage of site due to asset failure requiring Operational response
Reactive Raw WQ	Full or partial outage of site due to raw water challenge e.g. turbidity
Planned	Full or partial outage resulting from asset(s) being taken out of service for planned maintenance
Requires Upgrade	Site is unable to achieve target deployable output although no failed asset(s)

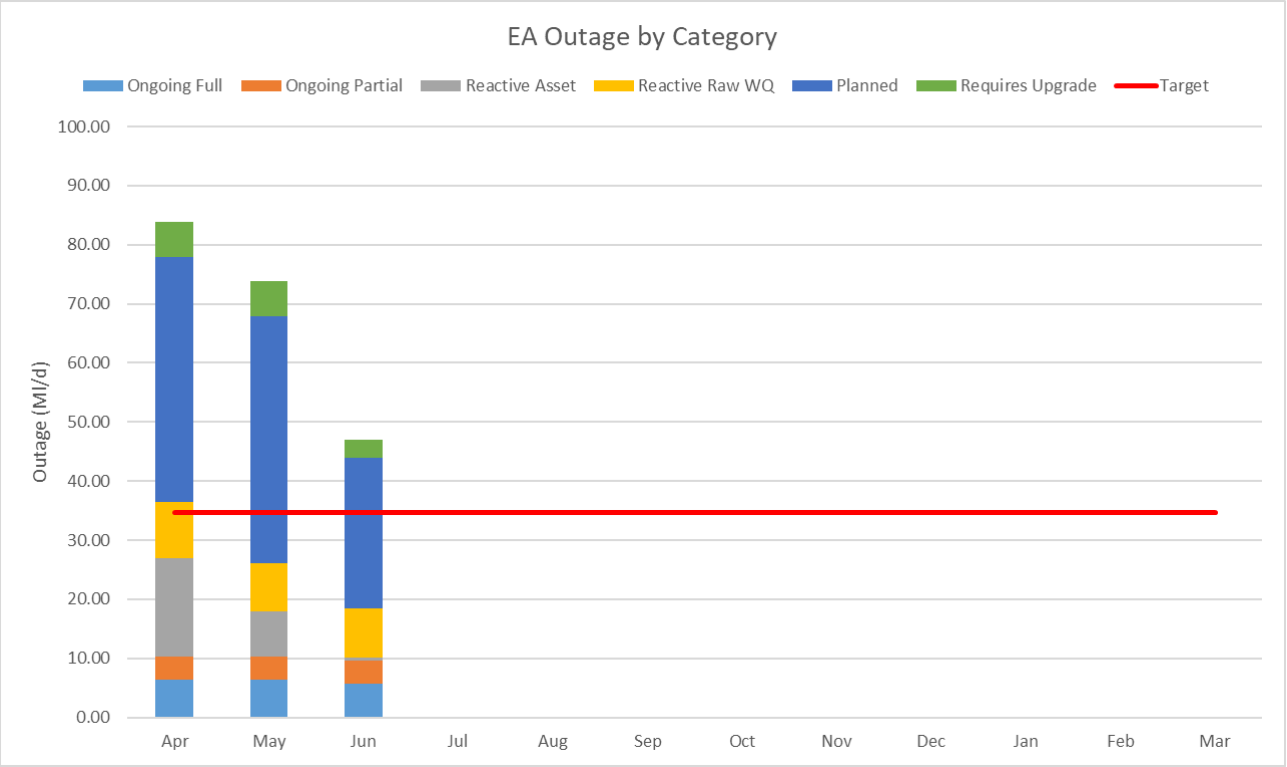

Figure 5. Outage performance since April 2025 for the whole company.

Effects of outage on supplies and the supply-demand balance

An outage allowance is included in the water planning supply-demand balance. If the actual outage is kept within that allowance, the supply-demand balance is not negatively affected, but if the allowance is exceeded, there is a direct impact on the supply-demand balance.

However, this Stage 0.1 Drought Order application is made on the basis that any transfer out of the Southampton West zone will be minimised as much as possible. That being so, the only remaining 'outage' influence on the order is at Otterbourne Works Surface Water, in the Southampton East zone, which has a filter out of service.

It is vital that Southern Water can keep the Testwood Treatment Works abstraction in service and performing sufficiently well to maintain supplies to customer demand in the zone and to neighbouring zones, especially the IOW.

Actions undertaken to manage outages

Southern Water has deployed a "Water First" initiative to develop and implement a new fit for the future approach to operational maintenance and investment planning. This included conducting systematic surveys of operational hazards and risks to drive prioritisation in risk and resilience investment. This programme has already driven down outages compared to the statistics of several years ago.

Plans for further outage recovery

As there is currently no operational outage on the IOW, outage recovery is currently focused on Hampshire.

Due to Southern Water's continued drive to reduce outages as much as practicably possible, the only outage that needs to be recovered is at Otterbourne Surface Water. This is currently carrying 11.99 Ml/d of outage as a treatment process filter is out of service, reducing the potential throughput of the site. This is due to be returned to service in July 2025.

Resource benefits of outage recovery

Any reduction of outage is beneficial to reduce supply risk. As an example, Ventnor Works was successfully returned to service, improving supply resilience on the IOW. This has provided additional benefit as its output is above the zero deployable output assumed for the source in the WRMP supply-demand balance.

However, outage is not causing the need for this Stage 0.1 Drought Order application.

3.8 Other actions and consequences of the drought order

Management of transfers and bulk supplies

The main opportunity to reduce abstraction at the Testwood abstraction relates to reducing transfers from the Southampton West supply zone to neighbouring zones. The River Test abstraction is the only source for the Southampton West supply area, with no alternative sources available.

In recognition of the River Test Stage 0.1 Drought Order requirement, Southern Water intend to minimise transfer from Southampton West to Southampton East, aiming to reduce this to effectively zero whenever possible (except for the need to maintain a small sweetening flow). This approach will be escalated first as the river flow recession progresses below the 60-day trigger level, and especially if it falls below the 35-day trigger level.

This will cause increased abstraction at Southern Water's abstraction points on the River Itchen to compensate for the reduced supply to the Southampton East zone. Reducing the transfer to the Hampshire Rural zone also increases the pressure on the groundwater abstraction in that zone. If an outage event occurs in these other zones, a transfer may have to be reinstated from the Hampshire Southampton West zone. However, the Portsmouth Water Bulk Supply can support the Hampshire Southampton East zone, and Portsmouth Water will be contacted to optimise this relative to the drought order management.

If the River Itchen flow falls to levels where it becomes a concern, Southern Water would use the supply from Portsmouth Water to help reduce abstraction pressures as there is consensus that taking water at the Itchen

tidal limit (Supply from Portsmouth Water to Southern Water) is environmentally preferable to abstraction at more upstream sources when flows are low.

However, if the River Itchen flows continue to fall, there will be an increased risk of needing to apply for the Candover or Lower Itchen Drought Orders. Under these circumstances, the S20 Agreement expects further consideration of the environmental balance of abstraction between the River Test and the River Itchen.

The other main transfer from the Southampton West supply zone, facilitated by the Testwood surface water abstraction, is the transfer to the IOW. Southern Water has reviewed all supply production opportunities on the IOW and have concluded that it is unlikely that the transfer could be reduced to less than 12 Ml/d and there are some current source output risks and relatively recent new abstraction licence constraints on the IOW that may mean the transfer cannot be reduced that low or, if it is, not for long periods. Southern Water will keep this under review as the Stage 0.1 Drought Order application progresses, but it is not envisaged that a large reduction of this allowance will be possible in the short term.

Other actions undertaken to manage resources or reduce demand

Demand management and/or leakage reduction in the Southampton West supply area itself (or in neighbouring areas relative to normal transfer support from Southampton West) will provide the only other means of reducing the abstraction requirement while still satisfying customer requirements. Southern Water's approach to these measures is covered above (Sections 3.3, 3.4 and 3.6).

Other actions considered and rejected to manage resources or reduce demand

Southern Water has considered whether alternative abstraction in other supply areas might provide any means to supplement the Southampton West supply area and help reduce the Testwood surface water abstraction. There is no immediate infrastructure capability to bring water into the Southampton West supply area from neighbouring zones. The development of a 'regional grid' is proposed within the WfLH programme, but this is still some years from beneficial availability.

If this were essential, water would have to be tankered in, which has logistical difficulties, social and environmental impacts and limits volumes.

Benefits of the order

The Stage 0.1 Drought Order will enable Southern Water to maintain supplies to customers. This position is explained in more detail in the Statement of Reasons (document ref: ***1.2 Reasons for the Order***).

Consequences if the order is rejected

Without the Stage 0.1 Drought Order, unplanned and severe water restrictions are at risk of being imposed on customers. This position is explained in more detail in the Statement of Reasons (document ref: ***1.2 Reasons for the Order***).

3.9 Summary of actions in line with the drought plan

This Stage 0.1 Drought Order application is consistent with DP19, dDP22, and the S20 Agreement. Southern Water has:

- Monitored the water resources situation, including rainfall and river flow levels and made forecasts of how the situation may develop. These have been discussed with the EA.
- Set out a schedule through to application submission, the EA's period of determination of the application, and potential implementation.
- Engaged stakeholders in the pre-application period and advised them of the process and their opportunity to participate.
- Undertaken enhanced promotion of water efficiency.
- Deployed enhanced resources to reduce network leakage.
- Adjusted operations to minimise the required abstraction at Test Surface Water (Testwood).
- Progressed the substantial package of monitoring and mitigation to be implemented for the River Test, as detailed further in the appendices of ***Documents 1.1 and 2.2***.

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