

Drought Plan 2027: Annex 2

Drought Actions

May 2026



from
**Southern
Water** 

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IMPORTANT NOTE:

This Annex is incomplete and the table below describes progress, along with work still to be completed.

Annex 2: Drought Actions	Description
Annex % Complete	50%
Work Completed	<p>The annex has been drafted, but all demand action initiation trigger values and our actions will need to be amended or rewritten depending on the outcome of discussions with the Environment Agency (EA) and Defra concerning drought triggers and actions in Hampshire.</p> <p><i>This Annex is in draft form only. As indicated below, the content remains subject to further analysis, regulatory input and evidence and may be amended prior to finalisation of the Drought Plan. Southern Water does not invite reliance on this section in its current form.</i></p>
Work Remaining	<p>Drought communications will need amending based upon a decision on the use of Temporary Use Bans (TUBs) and Non-Essential Use Bans (NEUBs) in Hampshire and proposed licence change for the River Itchen.</p> <p>All of the demand action initiation triggers need to be amended as part of future discussions with the EA and Defra about the implementation of TUBs and NEUBs in Hampshire due to proposed changes to the River Itchen Hands-off Flow (HoF) and licence.</p> <p>Amendments to demand action triggers will also need to consider changes to an amended Section 20 (S20) Agreement and a regulatory agreement on the use of cases for Imperative Reasons of Overriding Public Interest (IROPI) and Exceptional Shortage of Rainfall (ESoR).</p> <p>Sequencing of drought order and permit implementation (Section 3.8.3) will be updated once the sequencing of drought orders in Hampshire has been agreed with regulators.</p> <p>Tables and Figures all need to be completed.</p>
External Deliverables	<p>Consultancy support</p> <p>Atkins – surface water drought triggers. To be completed in October 2026.</p>

Annex 2: Drought Actions	Description
	<p>Regulatory support</p> <p>Amendment of the Section 20 Agreement and agreement on a River Itchen licence renewal with the EA.</p> <p>Agreement with EA and Defra on the use of TUBs and NEUBs in Hampshire.</p> <p>Agreement with the EA and Defra on the case (or not) for ESoR in Hampshire.</p>
<p>Dependencies</p>	<ul style="list-style-type: none"> • Section 20 Agreement; and • River Itchen licence renewal.
<p>Critical Path</p>	<p>Meetings and workshops with the EA, Defra and NE to agree a revised S20 Agreement and River Itchen licence.</p>
<p>Timeline</p>	<p>A programme of meetings and workshops need to be agreed with the Environment Agency during June 2026.</p>
<p>Decision points, meetings and workshops</p>	<p>Demand and supply actions will need to be amended based upon:</p> <ul style="list-style-type: none"> • Outcomes from the EA 2025 drought lessons learned workshops. Awaiting dates from the EA for an ESoR workshop (2025 drought lessons learned workshop). • Agreement with the EA on a change to the River Itchen licence (and HoF). • Agreement on IROPI and ESoR regarding the proposed River Itchen licence change. • An amended S20 Agreement between SWS, EA and Portsmouth Water; and • Agreement with EA and Defra on the use and application of TUBs and NEUBs in Hampshire based on proposed changes to the River Itchen Licence.

1. Introduction

This annex contains further descriptive information on each of the actions used in the drought plan. The information sets out what the action is and provides summary information on when we would expect to use this type of measure, what impact it would have on supplies and how long this type of action takes to initiate. The drought actions are split into demand-side and supply-side actions. The demand-side actions aim to reduce the demand for water and the supply-side drought actions aim to increase the volume of water available.

2. Demand actions

2.1. Media campaigns

Campaigns to raise public awareness of water use can be carried out in a number of ways using a variety of different types of media. The central message is to urge customers to conserve water, especially during periods of drought. This message should be underpinned by an explanation of the prevailing water resource conditions and how the drought might continue to intensify. In addition, we may promote an enhanced offer of our water efficiency programme.

Under normal conditions we already carry out water efficiency household audits and retrofits as well as water wise talks to schools and community groups.

Once we enter a Level 1 drought we will seek to carry out further water efficiency actions. We will engage with partner organisations to ensure a co-ordinated approach to interventions. We will initiate discussions with local authorities regarding watering regimes for public parks and gardens and we will carry out further media campaigns to encourage water efficiency. It is expected that the lead in time for these actions will be one week.

Once we enter a Level 2 drought we will carry out an enhanced media campaign to publicise restrictions and encourage water savings. We expect basic enhanced messaging to take about two weeks' lead-in time and a full campaign to take between four and six weeks' lead-in time.

These interventions may not deliver significant demand savings when compared with other measures as there is strong reliance on customer collaboration. During the 2011-12 drought, water companies in the South East worked together to ensure that messages from companies to their customers were aligned. As part of the WRSE group, we will continue working with our neighbours to keep messaging consistent.

Table 2-1 summarises demand action decision points and drought levels that media campaigns support.

This table is under review.

Table 2-1: Media Campaign Demand Action

Summary	Media campaigns aimed at changing the behaviour of customers so that they are making efforts to save water, especially during summer months		
Decision Point	Level 1 SPI/SPEI Trigger - TBC Flow Trigger - TBC	Drought Levels	Level 1 - 4
Expected Impact	TBC		
Lead Time	TBC		



2.2. Leakage control

As part of our normal operations, we have invested significantly in leakage reduction since 1992, which has yielded significant savings in water (Figure 2.1). Our leakage target is set by our regulator Ofwat. Our target over AMP8 (the 8th Asset Management Period which is 2025-30) is to reduce leakage to 66.21MI/d by 2030. Our long-term goal is to reduce leakage by 50% by 2050 compared to our reported leakage in 2018.

Our analysis suggests that it may be possible to reduce leakage by up to 1.5% on peak weekly demand after a mild winter. However, there is a lead-in time of approximately 3 months needed for training and resourcing staff to undertake additional leakage control activity. Thus, in a second consecutive mild winter, leakage reduction could be a useful tool during a drought.

A dry winter could be severe in temperature terms, and lead to increased leakage. If the winter were dry but severe in terms of the number and duration of periods of time when temperatures remained below zero continuously, then it is highly unlikely that leakage reductions of 1.5% could be achieved.

There is also evidence suggesting that leakage may increase during a drought as a result of soils drying out, resulting in ground movement and the differential movement of pipework that can exacerbate leakage from joints. Therefore, without additional leakage detection and repair resources, leakage might otherwise be expected to increase during drought years.

During droughts we will consider whether activity on leakage reduction should be enhanced by improving the detection and/or the repair time for all leaks to deliver higher water savings.

We will also include information on how we are managing leakage when we submit a drought permit application.

This figure is under review.

Figure 2-1: Our leakage since 1992

Table 2-2 summarises demand action decision points and drought levels that leakage measures support.

This table is under review.

Table 2-2: Leakage Control Demand Action

Summary	Enhanced leakage reduction by improving the detection and/or the repair time for all leaks to deliver higher water savings.		
Decision Point	Level 1 SPI/SPEI Trigger - TBC Flow Trigger - TBC	Drought Levels	Level 1 - 4
Expected Impact	TBC		
Lead Time	TBC		

2.3. Mains pressure reduction/management

Mains pressure is already optimised across our WRZs and therefore the ability for further reduction is limited. In addition to reducing leakage, pressure reduction also reduces demand by restricting flow rates from open-tap devices such as garden taps. Further pressure reduction during periods of drought could be implemented where appropriate, but not to such an extent that pressures fail to meet the level of service for water pressure. We would implement mains pressure reduction gradually, whilst assessing the impact on our customers at each stage. Following extensive pressure management activity in recent years, the scope for further pressure reduction in our supply area is considered to be minimal.

The Fire and Rescue Service has previously expressed concerns that low mains water pressure might reduce its ability to tackle fires, although under normal drought conditions we would not expect pressures to fall below the DG2 reference level. Internal guidelines have been prepared for mains pressures to be further reduced under severe drought conditions where the supply-demand balance is breached or is threatened to be breached. Should these circumstances arise, we would need to ensure that we consult extensively with the relevant Fire and Rescue Service at each stage of the process.

Table 2-3 summarises demand action decision points and drought levels that leakage measures support.

This table is under review.

Table 2-3: Mains Pressure Reduction / Management Drought Action

Summary	Adjustment of mains pressure to reduce leakage and water use.		
Decision Point	Level 2 Primary Triggers Test and Itchen HoF (Level 2) - TBC	Drought Levels	Level 1 - 4
Expected Impact	Negligible, mains pressure is already optimised across our WRZs		
Lead Time	1-3 months, would require period of monitoring and adjustment		

2.4. Temporary Use Ban

The impact of drought is felt in different areas and over different timescales. To manage this risk, water use restrictions (TUBs) are an important measure that water companies can use to reduce demand during drought. They not only enable companies to maintain essential supplies but also help to conserve water resources in periods of water shortages and reduce the environmental impacts of abstraction.

We will only impose water use restrictions upon our customers if they are absolutely necessary, and in accordance with our Levels of Service (LoS) for water supply. We fully appreciate the confusion that can be caused when one company introduces restrictions, but a neighbouring company does not. One of the reasons for this is the spatial extent of the drought: it may be very localised and not extend beyond the area served by an individual water company. Clearly from a customer point of view, if water use restrictions need to be imposed then a simple and consistent approach should be adopted across the South East.

At the regional level, one water company may need to impose water use restrictions earlier in a drought than its neighbours, while another water company is able to withhold the imposition of restrictions until much later or not at all.

Water companies may have to react differently in terms of restrictions and their timing due to the following reasons.

- **Differing levels of drought severity across the region:** Whilst droughts across the South East will generally be caused by a regional trend of several months of below average rainfall, sub-regional differences in rainfall amount may cause differing levels of water shortage across the region. In other words, the need to impose restrictions for one company may not equally apply to another.
- **Differing vulnerabilities at WRZ level:** WRZs can be divided into those dependent upon:
 - River abstraction only;
 - Groundwater abstraction only;
 - Reservoirs filled by abstracting local river water or by impounding river water;
 - Various combinations of the above.

This mix of WRZ types means that even if there were not a significant difference in drought severity across the region, WRZs will tend to react differently to the same drought, with certain WRZs experiencing higher levels of risk to potable supplies than others. That means in similar drought conditions, rivers, groundwater sources and reservoirs across the region can respond differently in terms of risk to supply. For example, a WRZ dependent on combined river abstraction and reservoir storage for supply may have a different level of risk to one based on groundwater abstraction. This difference in WRZ vulnerability has an impact both at the company level and regional level. A water company may need to introduce water use restrictions in its more vulnerable WRZs but not need to extend the ban to the remaining zones in its area of supply.

TUBs are powers granted to water companies to impose restrictions on customers' water use. TUBs can be introduced quickly – seven days after an advert has been placed in newspapers in the area which will be affected. They predominantly focus on water use by domestic customers because this provides the largest water saving and helps protect public services and the economy.

Previously TUBs were referred to as 'hosepipe bans' but they were modified in 2010 under the Flood and Water Management Act 2010 to cover a wider range of restrictions. This legislation, which significantly widened the scope of the previous hosepipe ban powers comprises:

- Section 76 of the Water Industry Act 1991 (Water Industry Act 1991), as amended by section 36 of the Flood and Water Management Act 2010 (FWMA 2010); and
- The Water Use (Temporary Bans) Order 2010, which is a statutory instrument (No. 2231) providing definitions of words and phrases and certain exceptions to the categories of water use specified in section 76 of the Water Industry Act 1991.

Under section 76(2) of Water Industry Act 1991 the widened range of uses of water that a water company can control without referring the decision to the Secretary of State are as set out below:

- Watering a garden using a hosepipe.
- Cleaning a private motor-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.
- Cleaning walls, or windows, of domestic premises using a hosepipe.
- Cleaning paths or patios using a hosepipe; and
- Cleaning other artificial outdoor surfaces using a hosepipe.

Most water use prohibited under a TUB applies to the use of water drawn through a hosepipe or similar apparatus.

Section 76(1) of the Water Industry Act 1991 further states that “a water undertaker may prohibit one or more specified uses of water supplied by it if it thinks it is experiencing, or may experience, a serious shortage of water for distribution”. Although this means there is no express link to drought when applying the above powers, a drought event is the most likely reason a company would experience a shortage of water for distribution.

Historically water resources have tended to be more vulnerable to drought in our Eastern and Central areas, and this is reflected in the history of demand interventions. The IOW WRZ has a high summer population which, coupled with its small aquifer and reliance upon transfers from the mainland, have also made it vulnerable to droughts in the past.

Since the 2011-12 drought all water companies in England and Wales, including SWS, have signed up to the ‘UKWIR Code of Practice and Guidance on Water Use Restrictions’ (2013)¹. The code of practice presents common standards and approaches to restrictions and exemptions to ensure consistent and coherent messaging and communications between companies and customers, stakeholders, governments, regulators and the media.

The four principles are:

- Ensuring a consistent and transparent approach.
- Ensuring that water use restrictions are proportionate.
- Communicating clearly with customers and the wider public/users; and
- Considering representations in a fair way.

Under the 4th principle of the code of practice, we should apply an even-handed process for considering objections and representations from individuals or groups. The consultation on our 2019 Drought Plan provided customers with an opportunity to provide feedback and representations on our proposed phasing of restrictions.

The code also sets out five actions that should be followed by water companies in England and Wales:

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

By signing up to the code of practice we agree to follow the principles and actions mentioned above.

¹ This UKWIR code of practice was updated in 2023 and is available at this link [Update to the Drought Code of Practice 2013 \(ukwir.org\)](#). This is the 2022 drought plan and therefore pre-dates the 2023 code of practice but, if we are required to use a drought code of practice, we will refer to the updated, 2023 code.

2.4.1. TUB Exemptions

Water companies can grant exemptions from these restrictions for customers and businesses. The types of exemptions to water restrictions that companies can offer can be defined as follows:

- Statutory - activities/water uses which are exempt from the legislation.
- Discretionary exemptions - activities/water uses which are not covered by a statutory exception but water companies can grant the use of a hosepipe under certain circumstances.

Discretionary exceptions can be further split into two categories:

- 'Universal' – these exceptions have been agreed by all companies who signed up to the Drought Code of Practice (A document which aims to ensure a common approach to drought management by UK Water companies). Such exceptions do not require customers to write or make representation to the water company to obtain permission; and
- 'Other concessions' – these are exceptions which individual water companies can choose to offer customers, depending on the particular circumstances. These exemptions do require customers to write or make representation to the water company to obtain permission.

The water companies in the South East have had formal meetings to discuss the development of their plans and ensure that they are implementing the powers as consistently as possible. The companies are committed to working collaboratively during periods of water shortages. In this context they have worked together to align the drought levels in their plans and to align as closely as possible the restrictions and exemptions that would be imposed when a TUB and a Non-Essential Use Ban (NEUB) are implemented. These exemptions aim to minimise the impact on vulnerable customers and the economy.

The exemptions from TUBs that are given in Table 2.3 below and the exemptions from NEUBs given in Table 2.4 reflect the agreements made by us and the other companies in the South East.

2.4.2. Representations

Our approach to handling representations, upon us giving notice of restrictions, is set out below. This is in accordance with section 76b (3) of the Water Industry Act 1991, which states that '*The notice must give details of how to make representations about the proposed prohibition*'. The code of practice and guidance for water companies on water use restrictions 2013 states that '*Water companies will communicate clearly their intentions to implement water use restrictions in an appropriate and timely manner to customers and their representatives, regulators and adjacent water companies. Water companies will give due consideration to any information provided by customers*'.

We will publish a public notice in regional newspapers and the London Gazette as part of the process to introduce TUBs. The notice will specify the method and timescale for customers to make representations and will normally be in writing to a named individual on the public notice. The timescale for responses, will be a minimum of 7 days (which is the time period allowed for under a drought order to restrict water use, as set out in Schedule 8 of the WRA 1991). This notice will also be published on our company website.

Information about restrictions would be communicated to customers and stakeholders through multiple channels, as described in Annex 6. We are confident that in getting the communications right and utilising all the channels available to us, we will be able to handle a large number of respondents. In the event that there was an unexpected number of respondents that caused the contact centre to be overwhelmed, we would move to mitigation measures.

2.4.3. TUB Water Savings

This section is under review.

2.4.4. TUB Demand Action Decision Points

Table 2-4 summarises demand action decision points and drought levels that Temporary Use Bans (TUBs) support.

This table is under review.

Table 2-4: Temporary Use Bans

Summary	Temporary Use Bans		
Decision Point	Level 2 Primary Triggers Test and Itchen HoF (Level 2) - TBC	Drought Levels	Level 2
Expected Impact	Varies by area and season We are currently reviewing our expected impact from implementing TUBs and discussing with the EA and Defra how TUBs are to be utilised in Hampshire.		
Lead Time	4-8 weeks after appeal for restraint (Level 1 Media Campaign). TBC		

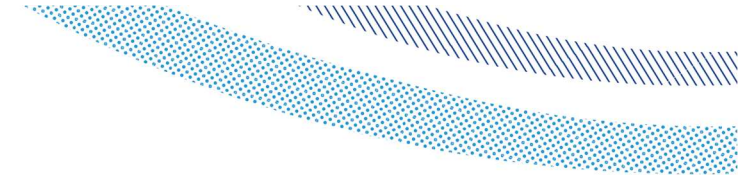
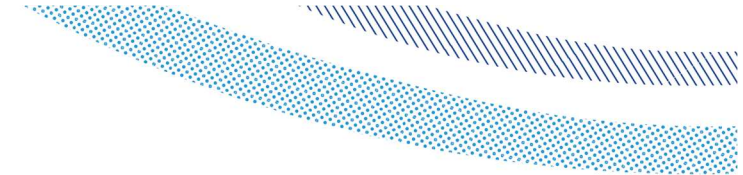


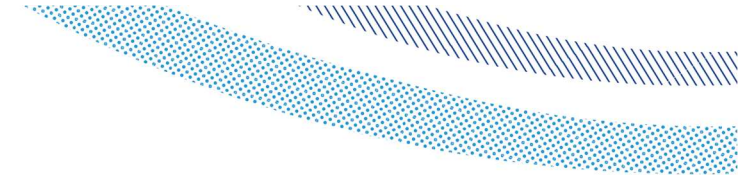
Table 2-5: Exemptions from TUBs

This table will be amended for the final draft of Drought Plan 2027.

TUB Category	Statutory Exemptions	Discretionary Universal Exception (granted by all water companies)	Suggested Discretionary Concessional Exception (granted by individual water companies)
Watering a garden using a hosepipe.	Using a hosepipe to water a garden for health or safety reasons. In this category, the definition of 'a garden' includes 'an area of grass used for sport or recreation'. 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.	<ul style="list-style-type: none"> • Blue Badge holders on grounds of disability. • Use of an approved drip or trickle irrigation system fitted with a PRV and timer. 	<ul style="list-style-type: none"> • To customers on the company's Vulnerable Customers List who have mobility issues but are not in possession of a Blue Badge. • To water newly laid turf for first 28 days.
Cleaning a private motor-vehicle using a hosepipe.	A 'private motor-vehicle' does not include: (1) a public service vehicle, as defined in section 1 of the Public Passenger Vehicles Act 1981 (c), and (2) a goods vehicle, as defined in section 192 of the Road Traffic Act 1988 (d).	<ul style="list-style-type: none"> • To Blue Badge holders on the grounds of disability. • Use of a hosepipe in the course of a business to clean private motor vehicles where this is done as a service to customers. 	<ul style="list-style-type: none"> • To customers on the company's Vulnerable Customers List who have mobility issues but are not in possession of a Blue Badge.
Watering plants on a domestic or other non-commercial premises using a hosepipe.	Does not include watering plants that are: (1) grown or kept for sale or commercial use, or (2) that are part of a National Plant Collection or temporary garden or flower display.	<ul style="list-style-type: none"> • To Blue Badge holders on the grounds of disability. • Use of an approved drip or trickle irrigation system fitted with a PRV and timer. 	<ul style="list-style-type: none"> • To customers on the company's Vulnerable Customers List who have mobility issues but are not in possession of a Blue Badge. • To water newly laid turf for first 28 days using drip irrigation.
Cleaning a private leisure boat using a hosepipe.	(1) Cleaning any area of a private leisure boat which, except for doors or windows, is enclosed by a roof and walls, (2) Using a hosepipe to clean a private leisure boat for health or safety reasons.	<ul style="list-style-type: none"> • Commercial cleaning. • Vessels of primary residence. • Cases where fouling is causing increased fuel consumption. • Engines designed to be cleaned with a hosepipe. 	<ul style="list-style-type: none"> • To prevent or control the spread of non-native and/or invasive species.
		None.	None.



TUB Category	Statutory Exemptions	Discretionary Universal Exception (granted by all water companies)	Suggested Discretionary Concessional Exception (granted by individual water companies)
Filling or maintaining a domestic swimming or paddling pool.	<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 a programme of medical treatment.</p> <p>(4) Filling or maintaining a pool that is used for the purpose of decontaminating animals from infection 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>		
Drawing water using a hosepipe for domestic recreational use.	None.	None.	None.
Filling or maintaining a domestic pond using a hosepipe.	Filling or maintaining a domestic pond in which fish or other aquatic animals are being reared or kept in captivity.	Blue Badge holders on the grounds of disability.	<ul style="list-style-type: none"> To customers on the company's Vulnerable Customers List who have mobility issues but are not in possession of a Blue Badge
Filling or maintaining an ornamental fountain.	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.	None.	<ul style="list-style-type: none"> To operate water features with religious significance.



TUB Category	Statutory Exemptions	Discretionary Universal Exception (granted by all water companies)	Suggested Discretionary Concessional Exception (granted by individual water companies)
Cleaning walls or windows of domestic premises using a hosepipe.	Using a hosepipe to clean the walls or windows of domestic premises for health and safety reasons.	<ul style="list-style-type: none"> • To Blue Badge holders on the grounds of disability. • Commercial cleaning. 	<ul style="list-style-type: none"> • To customers on the company's Vulnerable Customers List who have mobility issues but are not in possession of a Blue Badge. • Where this is undertaken as a service to customers or part of a business.
Cleaning paths or patios using a hosepipe.	Using a hosepipe to clean paths or patios for health and safety reasons.	<ul style="list-style-type: none"> • To Blue Badge holders on the grounds of disability. • Commercial cleaning. 	<ul style="list-style-type: none"> • To customers on the company's Vulnerable Customers List who have mobility issues but are not in possession of a Blue Badge.
Cleaning other artificial surfaces using a hosepipe.	Using a hosepipe to clean an artificial outdoor surface for health or safety reasons.	<ul style="list-style-type: none"> • To Blue Badge holders on the grounds of disability. • Commercial cleaning. 	<ul style="list-style-type: none"> • To customers on the company's Vulnerable Customers List who have mobility issues but are not in possession of a Blue Badge.

2.5. Non-Essential Use Ban

Following the introduction of TUBs and if a drought continues to worsen, water companies can also apply to the Secretary of State for the Environment to further increase the level of water restrictions with a drought order.

These are introduced in addition to TUBs and include restrictions on businesses which use water in their operations. Prior to applying for drought orders, to implement NEUBs, we would work closely with businesses and trade organisations to encourage them to use water wisely, and so delay the introduction of restrictions which could then impact on their operations. In some cases, the Government may hold a public inquiry before granting permission for a drought order.

Restrictions could be available for:

- watering outdoor plants on commercial premises.
- filling or maintaining a non-domestic swimming or paddling pool.
- filling or maintaining a pond.
- operating a mechanical vehicle-washer.
- cleaning any vehicle, boat, aircraft or railway rolling stock.
- cleaning non-domestic premises.
- cleaning a window of a non-domestic building.
- cleaning industrial plant.
- suppressing dust; and
- operating cisterns.

In order to grant a drought order under WRA 1991 73(2), the Secretary of State must 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'

The potential timescales for introducing restrictions by recourse to a drought order are significantly longer than those for TUBs under the Water Industry Act 1991, and the Secretary of State may require a public inquiry or hearing to be held which can impact on timescales.

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.

2.5.1. NEUB Exemptions

Exemptions can be granted under certain conditions. These are given in Table 2-6.

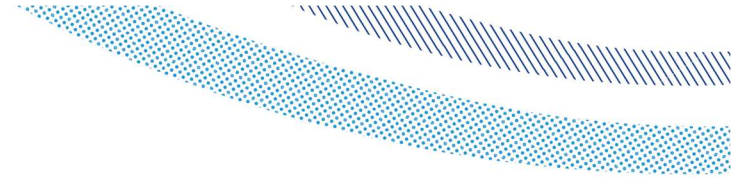
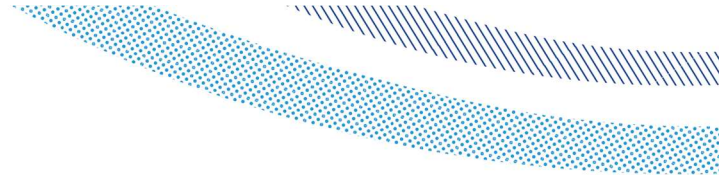


Table 2-6: Drought Order NEUB Exemptions


Drought Order Category	Statutory Exemptions	Universal Exception	Discretionary Exception	UKWIR Suggested Discretionary Exceptions
Watering outdoor plants on commercial premises	This includes plants which are in a pot or container that is outdoors or under cover and plants which are in the ground under cover. This does not include plants grown (i.e. cultivated or propagated) or kept for sale or commercial use or plants part of a National Plant Collection or temporary garden or flower display.	None.	Use of an approved drip or trickle irrigation system fitted with a PRV and timer is set for use in the evening or night.	Use of an approved drip or trickle irrigation system fitted with a PRV and timer
			Water newly bought plants for the first 28 days after the implementation of the ban.	Watering newly bought plants
Filling or maintaining a non-domestic swimming or paddling pool	None. This restriction shall not apply to: <ul style="list-style-type: none"> • Pools open to the public (a pool is not open to the public if it may only be used by paying members of an affiliated club or organisation). 	None.	None.	Swimming pools serving industrial training if considered justified.
				Swimming pools with covers.
				Pools with religious significance.
				Pools fitted with approved water conservation or recycling systems.



Drought Order Category	Statutory Exemptions	Universal Exception	Discretionary Exception	UKWIR Suggested Discretionary Exceptions
	<ul style="list-style-type: none"> • Filling or maintain a pool that is used by pupils of a school for swimming lessons. • filling or maintaining a pool where necessary in the course of construction. • filling or maintaining a pool using a hand-held container which is filled with water drawn directly from the tap. • filling or maintaining a pool designed, constructed or adapted for use in the course of a programme of medical treatment. • filling or maintaining a pool that is used to decontaminate animals from infections or disease. • filling or maintaining a pool used in the course of veterinary treatment. • filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in captivity. 			Pools that are subject to significant repair and innovation.
Filling or maintaining a pond	This restriction shall not apply to ponds in which fish or other aquatic animals are being reared or kept in captivity or to filling or maintaining the pond with a hand-held container which is filled with water directly from the tap.	Blue Badge holders on grounds of disability.	None.	Customers on the company's Vulnerable Customer List who have mobility issues but are not in possession of a Blue Badge.

Drought Order Category	Statutory Exemptions	Universal Exception	Discretionary Exception	UKWIR Suggested Discretionary Exceptions
Operating a mechanical vehicle washer	None	None	On biosecurity grounds	Washers which recycle water and thus use less than 23 litres per wash. On biosecurity grounds.
Cleaning any vehicle, boat, aircraft or railway rolling stock	Cleaning any vehicle, boat, aircraft or railway rolling stock for health and safety reasons	None	On biosecurity grounds	Low water use technologies. Small businesses whose sole operations are cleaning of vehicles using hosepipes. Those using vessels as a primary residence Cases where fouling of hulls causes fuel consumption. To remove graffiti. To prevent of control the spread of non-native and/or invasive species.
Cleaning any exterior part of a non-domestic building or non-domestic wall	Cleaning any exterior part of a non-domestic building or non-domestic wall for health and safety reasons	None.	To remove graffiti by applying to the wholesale supplier.	Small businesses whose sole operations are cleaning of buildings using hosepipes. Low water use technologies. To remove graffiti.
Cleaning a window of non-domestic building	Cleaning a window of non-domestic building using a hosepipe for health and safety reasons.	None.	Small businesses whose sole operations are cleaning of windows using hosepipes.	Small businesses whose sole operations are cleaning of windows using hosepipes.
Cleaning industrial plant	Cleaning industrial plant using a hosepipe for health and safety reasons.	None.	Biosecurity.	To remove graffiti.

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Drought Order Category	Statutory Exemptions	Universal Exception	Discretionary Exception	UKWIR Suggested Discretionary Exceptions
Suppressing dust	Suppressing dust using a hosepipe for health and safety reasons.	None.	None.	None.
Operating cisterns on unoccupied buildings	None.	None.	None.	None.

2.5.2. NEUB Water Savings

This section is under review.

Like the savings from TUBs, the savings that can be expected from a drought order to restrict water use are influenced by our universal metering programme. This has reduced overall demand and has the potential to reduce the savings from a drought order to restrict water use. The impact of restrictions will also be dependent upon prevailing demands and weather conditions and the level of media attention the drought may have received prior to introducing restrictions.

2.5.3. Compensation

Under the Water Resources Act 1991, water company customers have no entitlement from water companies in respect of loss or damage sustained as a result of the implementation of drought orders. However, our commitment to household customers also applies during drought events and we will work to honour the minimum standards of service that our customers can expect. Our guaranteed standards of service and associated compensation values can be found on our website at <https://www.southernwater.co.uk/our-story/guaranteed-standards-of-service>

People who suffer loss or damage as a result of a drought permit or order are entitled to compensation. The rules are set out in Schedule 9 to the WRA 1991. Those who may claim are:

- the owners of the source; and
- all other persons interested in the source or adversely affected by the taking of the water.

Under the rules of the act a claim may be made at any time not later than six months after the end of the period for which the permit or order authorises. Any disputes are referred by the claimant or applicant to the Upper Tribunal and are not a matter dealt with at the hearing. The Upper Tribunal may make an award during the duration of the permit or order in respect of likely damage, though in so doing it may have regard to the amount of water which was likely to have been available to the claimant as against others.

When we advertise and consult on drought permit/order applications, to provide us with additional supplies in a drought, we will reference the above to ensure abstractors who are potentially impacted by the drought measures are made aware that they may make a claim for compensation to the Lands Tribunal. We will work with the EA at the time of making a permit application to ensure we have captured all abstractors downstream of drought permit/order sites that might be at risk of derogation due to drought permits/orders being implemented.

2.5.4. Phasing of Restrictions on Demand

We will introduce restrictions on demand in a phased manner. The precise order in which individual activities are implemented and whether implementation of each activity can be made, subject to qualifications, will have to be decided at the time considering all relevant circumstances including the supply-demand situation. It may thereafter be reviewed in the light of experience or changing circumstances. Nevertheless, we herein provide a summary of the indicative phasing of restrictions, covering both TUBs and a drought order to restrict water use as a guide (Table 2-7).

Table 2-7: Summary of Indicative Phasing of Restrictions on Water Demand

This table is under review.

Restriction activity	TUB / Drought Order	Level 1: Impending Drought	Level 2: Drought Conditions	Level 3: Severe drought conditions (Phase 1)	Level 3: Severe drought conditions (Phase 2)
Watering a garden using a hosepipe (includes parks; gardens open to public; lawns; grass verges; areas of grass used for sport or recreation; allotment gardens; any area of allotment used for non-commercial purposes; and any other green space).	TUB		✓	✓	✓
Including national or international sports events; grass surfaces used for sport or recreation where watering is undertaken in relation to particular playing or other surfaces designated by the company, for no more than 2 hours a week and only between the hours of 1900hrs and 0700hrs.	TUB				✓
Cleaning a private motor-vehicle using a hosepipe.	TUB		✓	✓	✓
Including businesses specialising in hand car-washing using hosepipes as part of their process.	TUB				✓
Watering plants on domestic or other non-commercial premises using a hosepipe.	TUB		✓	✓	✓
Cleaning a private leisure boat using a hosepipe.	TUB		✓	✓	✓
Filling or maintaining a domestic swimming or paddling pool.	TUB		✓	✓	✓
Drawing water, using a hosepipe, for domestic recreational use.	TUB		✓	✓	✓
Filling or maintaining a domestic pond using a hosepipe.	TUB		✓	✓	✓
Filling or maintaining an ornamental fountain.	TUB		✓	✓	✓
Cleaning walls, or windows, of domestic premises using a hosepipe.	TUB		✓	✓	✓
Including small businesses using water-fed poles to clean domestic walls and windows; where the purpose of cleaning is the removal of graffiti.	TUB				✓
Cleaning paths or patios using a hosepipe.	TUB		✓	✓	✓

Restriction activity	TUB / Drought Order	Level 1: Impending Drought	Level 2: Drought Conditions	Level 3: Severe drought conditions (Phase 1)	Level 3: Severe drought conditions (Phase 2)
Including small businesses whose sole operations are the cleaning of paths and patios; where the purpose of cleaning is the removal of graffiti.	TUB				✓
Cleaning other artificial outdoor surfaces using a hosepipe.	TUB		✓	✓	✓
Including small businesses whose sole operations are the cleaning of hard standings; where the purpose of cleaning is the removal of graffiti.	TUB				✓
Watering outdoor plants on commercial premises.	Drought order		✓	✓	✓
Including watering of newly bought plants and plants watered using certain water efficient apparatus such as drip- or micro-irrigation through perforated hosepipes and sprinkler irrigation systems.	Drought order		✓	✓	✓
Filling or maintaining a non-domestic swimming or paddling pool.	Drought order		✓	✓	✓
Filling or maintaining a non-domestic pond.	Drought order			✓	✓
Operating a mechanical vehicle-washer.	Drought order		✓	✓	✓
Including Washers that recycle water and as a consequence use less than 23 litres of mains water per vehicle.	Drought order			✓	✓
Cleaning any vehicle, boat, aircraft or railway rolling stock.	Drought order			✓	✓
Including where the purpose of cleaning is the removal of graffiti.	Drought order				✓
Cleaning non-domestic premises	Drought order			✓	✓
Including where the purpose of cleaning is the removal of graffiti.	Drought order				✓
Cleaning a window of a non-domestic building.	Drought order			✓	✓
Including small businesses using water-fed poles to clean non-domestic windows.	Drought order				✓

Restriction activity	TUB / Drought Order	Level 1: Impending Drought	Level 2: Drought Conditions	Level 3: Severe drought conditions (Phase 1)	Level 3: Severe drought conditions (Phase 2)
Suppressing dust.	Drought order			✓	✓
Operating cisterns.	Drought order			✓	✓
Cleaning industrial plant.	Drought order				✓

Whilst water use restrictions to reduce demand are normally expected to be in place before drought permits/orders are implemented, there may be circumstances when this would not be appropriate. For example, when applying for a drought permit/order to enhance supply availability during the winter, the imposition of demand restrictions would have a very small impact because discretionary water use is low during the winter.

With regard to the phasing of TUBs, it should be noted that ‘the variation of a prohibition is to be treated as a prohibition’ (Water Industry Act 1991, 76b (4)). Hence the procedure for providing notice would need to be followed for each variation in prohibition, with the consequent time delay that would entail. This is important to consider when determining the number of phases we might adopt.

Reducing garden watering with a hosepipe has higher benefit in demand reduction during the early months of a drought when compared with other activities such as washing cars, boats and domestic windows. It is during spring time that many plants start to grow or recover from winter, and it would be seen as unfair by many customers to restrict garden watering with a hosepipe, if other uses continue to be allowed. After careful consideration on phasing of temporary water use restrictions, we believe that introducing the majority of TUBs in a single first phase is the optimum approach. This has the benefit of providing a strong message for the need to conserve water (even where some restrictions would not necessarily be expected to provide a significant water saving in their own right) and is less confusing in terms of the restrictions that may be in place at any given time. We will, however, consider delaying certain restrictions until a later phase, primarily to avoid the potential impact these can have on some small businesses.

We will work in partnership with neighbouring water companies, Water UK, Defra, Ofwat and the EA to co-ordinate as far as possible on messages, timings of announcements, restrictions, exceptions and concessions and stakeholder engagement. For example, in the 2012 drought SWS was signed up to the National Drought Management Group and participated in weekly meetings with the Strategic Drought Communications Group and Drought Communications Practitioners Group. These groups work to co-ordinate messages, information and updates going forward and develop group activities to keep customers better informed. However, it is also important to recognise that sometimes, depending on the nature of the drought, certain geographical areas may need to have specific messages. During an impending drought we will also initiate discussions with local authorities regarding watering regimes for public parks and gardens.

Although we would wish to have the power to implement a drought order restricting water use immediately after it is granted, we will re-assess the circumstances at the time of the drought order being granted. It may be appropriate to implement a drought order through a phased approach considering future circumstances, the requirements for the protection of public water supplies and other relevant circumstances. Depending on the speed a drought develops, we may seek to apply for a NEUB drought order whilst still under drought trigger conditions but not implement it until the severe drought trigger has been breached.

Our commitment to household customers also applies during drought events and we will work to honour the minimum standards of service that our customers can expect.

2.5.5. Wholesale contract - NAVs

A market reform process has been implemented in the water sector since April 2017 which enables non-household customers to choose their retailer for water supplies.

To ensure that operational interactions between wholesalers and retailers work effectively a contract has been produced by Market Operator Services Ltd (MOSL) Wholesale-Retail Code: Wholesale Contract for Wholesale Services 2017 which describes how the wholesaler and retailer will co-ordinate operational activities that are necessary for the wholesaler's provision of water services to the retailer. The new retailers are known as New Appointment and Variations (NAVs)

The following steps are set out in this contract and will be followed as a drought develops and we impose restrictions upon our domestic customers:

Step 1

The wholesaler and retailer may agree to follow any industry guidance or other code of practice regarding communications, including with non-household customers, in relation to drought or other dry weather conditions.

Step 2

Whether or not they are following any such guidance or code of practice, the wholesaler shall inform the retailer:

- when it considers a drought or dry weather conditions to be developing or escalating; and
- when it is giving particular consideration to any restriction on or reduction in water services.

The wholesaler shall also confirm to the retailer:

- the process by which it intends to manage the drought or dry weather conditions, including any lines of communication or planned discussions in relation to a potential restriction on or reduction in water services; and
- any reasonable message it wishes the retailer to convey to its non-household customers and the retailer shall convey such messages.

Step 3

In so far as it is possible, the wholesaler shall respond to any question the retailer reasonably asks in respect of such plan or message and the wholesaler shall consider any information or representation which the retailer makes in respect of it.

Step 4

The retailer shall follow any reasonable instructions the wholesaler gives it in relation to a drought or dry weather event e.g. by asking its non-household customers to reduce their demand for water. The wholesaler shall provide any information available to it that is reasonably requested by the retailer in relation to such instructions.

Step 5

If the wholesaler intends to issue a temporary ban on use under section 76 of the Water Industry Act 1991 which may be relevant to the retailer’s non-household customers' activities, or to seek any drought permit/order, it shall consult with the retailer.

If the wholesaler does issue any such ban or obtain any such drought permit/order, it shall inform the retailer and keep it informed of any change to the terms of such ban, drought permit/order.

Step 6

If the retailer becomes aware of any of its non-household customers breaching the terms of any temporary ban or drought order, it shall inform the wholesaler within one business day.

Step 7

The wholesaler shall inform the retailer whenever it considers a drought or other dry weather event to be subsiding and when any temporary ban, drought order/permit has been lifted.

NEUB Demand Action Decision Points

Table 2-8 summarises demand action decision points and drought levels that NEUBs support.

This table is under review.

Table 2-8: Non Essential Use Bans

Summary	Non Essential Use Bans to restrict water use		
Decision Point	Level 3 Primary Triggers - TBC Itchen Flow at TBC MI/d Test Total Flow at TBC MI/d	Drought Levels	Level 3
Expected Impact	Varies by area and season TBC		
Lead Time	TBC		

3. Supply actions

3.1. Operation of sources

Table 3-1 summarises demand action decision points and drought levels that the operation of our sources support.

This table is under review.

Table 3-1: Operation of Sources Supply Action

Summary	Adjustment of source operations to maximise storage and reduce environmental stress		
Decision Point	Level 1 SPI/SPEI trigger - TBC 60-days flow trigger - TBC Environmental stress triggers - TBC	Drought Levels	Level 1 - 4
Expected Impact	TBC		
Lead Time	TBC		

If a drought is threatened and develops, we will review the operation of our sources, and, where relevant, ensure that sources operate in an appropriate 'drought mode' e.g. by conserving storage in reservoirs. This would normally involve changing the balance of groundwater and surface water abstraction to protect future supplies in the event of drought conditions becoming more serious.

Typical operational responses include:

- Maximising abstraction from run-of-river sources in order to rest groundwater or reservoir sources during the early stages of drought. This maximises groundwater and reservoirs sources' availability at later stages of the drought when river flows are reduced to such a level that abstraction is constrained by flow conditions on the licence.
- Maximising pumping from groundwater sources where this will have little impact on availability later in the drought, in order to rest more vulnerable groundwater sources or surface water reservoirs that can then be used in later stages of a drought.
- Increasing inter-company transfers and inter-zonal transfers from areas that are not as significantly drought affected in order to alleviate abstraction from groundwater or reservoirs within the drought affected area(s); and
- Reduce abstraction from sources which may be causing environmental stress (e.g. those closest to surface water bodies or groundwater dependent terrestrial ecosystems) and relocate it elsewhere such as from headwater catchments to downstream sources.

3.2. Inter-company bulk transfers

We have a number of bulk supply agreements with neighbouring water companies that cover both imports and exports. The terms and conditions of these transfers are set out in the bulk supply agreements with the companies. During a drought we will maintain close communication with our neighbouring water companies to ensure that the drought situation is understood by all parties so that if there is a need to change a bulk import or export, we can take decisions in a timely manner in accordance with the Drought Plan and, jointly with the other company.

Agreements of bulk supplies from SWS to other companies are thus designed for droughts up to and including 1-in-200 year drought events and in some cases 1-in-500 year drought events. In reality, as a drought begins to develop, we do not know how severe it will become. There is a risk a drought may develop to be more severe than a 1-in-200 years event. In view of that risk, source outputs will be managed to ensure some output will remain available if a more severe drought occurs. For this reason, it may be necessary to reduce outputs in droughts less severe than a 1-in-200 year event. This reduction will be done as part of 'pain share' discussions with bulk supply recipients. 'Pain share' discussions will also cover the supplies that we receive from other companies as droughts approach the 1-in-200 years' severity.

It is not possible to accurately forecast the variations in volumes available for bulk transfers during any specific drought as this depends on a number of factors such as the relative status of available supplies, both at the time and in the future and demand restrictions in place for each water company.

We will continue to liaise with neighbouring companies to ensure there is mutual transparency and understanding around respective plans to seek constraint from, and place restrictions on, customers. We have been and will continue to ensure 'pain share' principles are agreed and included in all the updated and new contracts.

The hydrological trigger levels used for the management of inter-company bulk supplies will be the same as those for our own sources. This ensures that there is an equitable approach to the management of available supplies. Under drought conditions, the availability of supplies for transfer will be informed by reservoir control curves, groundwater trigger levels and, where applicable, river flow recession curves.

There are a number of stages at which decisions with regard to the provision of supplies will be reviewed and undertaken as follows:

- Under normal conditions, the volumes will remain available up to full rates under the terms of the bulk supply agreement.
- As drought trigger levels are approached and possibly breached, there will be discussion as to whether the full bulk supply agreement volumes can be provided. It is generally expected that the DOs as stated in the WRMP would still be available up to the drought trigger level and towards severe drought; and
- As trigger levels are breached and the situation deteriorates, further discussion would take place in order to determine if a reduction in volume can be managed.

Notwithstanding the above, Table 3-3 sets out details of the arrangements with neighbouring water companies for bulk supplies and shared resources during a drought. The DOs of the bulk supplies are estimated for three scenarios:

- Peak Deployable Output (PDO): This is the DO available from a source during periods of peak demand, which typically occur in the July-August period. Peak demand is estimated as a rolling 7-day average.
- Minimum Deployable Output (MDO): This is the DO available from a source when the supplies are expected to be at their lowest point, typically at the start of the autumn period. The demand during this period is measured as a 30-day rolling average; and
- Average Deployable Output (ADO): This is the DO available on average during a dry year i.e. a year with low rainfall but with no restrictions on customers' water use.

Table 3-2 summarises demand action decision points and drought levels that inter-company bulk transfer support.

This table is under review.

Table 3-2: Inter-Company Bulk Transfers

Summary	Optimise management of bulk transfers between water companies		
Decision Point	Level 1 SPI/SPEI trigger - TBC 60-days flow trigger - TBC	Drought Levels	Level 1 - 4
Expected Impact	It is not possible to accurately forecast the variations in volumes available for bulk transfers during any specific drought as this depends on a number of factors such as the relative status of available supplies, both at the time and in the future and demand restrictions in place for each water company.		
Lead Time	Ongoing activity throughout duration of drought.		



Table 3-3: Summary of Bulk Supply Arrangements During Drought Events

WRZ	Name and Capacity (MI/d) of Bulk Supply	Time constraints	Description	Pain Share Arrangements
Portsmouth Water (PRT)				

WRZ	Name and Capacity (Ml/d) of Bulk Supply	Time constraints	Description	Pain Share Arrangements
HSE	Import from Portsmouth Water to Hampshire PDO +15Ml/d MDO +15Ml/d ADO +15Ml/d	Further bulk transfer of up to 21 Ml/d planned from 2032 once Havant Thicket reservoir comes online.	<p>PRT has confirmed that its forecast surplus is sufficient to provide the 15Ml/d bulk supply into Hampshire without the need for additional resource developments and for this to be reliable up to and including droughts of 1-in-200 years severity. It is assumed that the bulk supply could be at risk in an extreme (above a 1 in 200 year) drought event, unless supported by a drought order covering SWS and PRT's Lower Itchen sources.</p> <p>As part of our planning assumptions we have assumed a 50% reduction in supply availability in an extreme drought event based on a best estimate of resource availability however this is not a commitment to the transfer.</p> <p>Bulk supply assumptions published in PRT's WRMP24 have since been superseded by the WRMP Annual Review 2025 Technical Note: Southern Water and Portsmouth Water Common Understanding on Bulk Supplies (December 2025).</p>	<p>The Section 20 Agreement recognises the possible need for a Lower Itchen Drought Order to maintain the bulk supply for severe and extreme drought. PRT has confirmed the supply should be available in drought events of up to and including 1-in-200 years severity.</p> <p>As drought develops SWS and PRT will undertake drought management by implementing their current Drought Plans. Accordingly, PRT and SWS should progressively increase monitoring and review of their water resource and supply-demand balance situations and should share situation reports regularly, monthly to weekly, depending on the drought stage. The two companies should also agree joint statements to the Press (Media) and customers.</p> <p>Should it become apparent that the full supply may not be available, the two companies should meet to ensure complete joint understanding of the reason(s) and the overall options for maintaining supplies. The two companies should establish and work to a management plan that makes the best overall use of resources, including their conservation, with due consideration of environmental impacts of operations and respective costs.</p> <p>Where this joint management approach involves one or other company incurring costs over and above that which it would incur if progressing individually, the additional cost should be reasonably shared. Such cost estimates and subsequent actual costs must be made available to the company in auditable detail in this circumstance.</p> <p>The options for managing demand should be considered. It will normally be expected that should PRT need to seek restraint by its customers or to restrict water use of its customers, in order to maintain the supply to SWS, then SWS should also seek restraint by its customers or restrict water use by its customers.</p> <p>It does not necessarily follow that should SWS already be seeking restraint by its customers or be restricting water use by its customers, PRT has to do this. However, under this circumstance, PRT should at least have a clear plan as to when it would implement those measures on its customers and should share this plan with SWS.</p> <p>SWS assumed a 50% reduction in supply availability in an extreme drought (1 in 500 year severity) event in its WRMP19 based on a best estimate of resource availability. This is not a commitment by Portsmouth Water to provide this volume, rather an estimate for supply-demand modelling purposes in the extreme drought condition. As a drought situation develops the companies would hold regular discussions to agree the volumes of bulk supplies and to discuss the appropriate pain share agreements.</p>

WRZ	Name and Capacity (MI/d) of Bulk Supply	Time constraints	Description	Pain Share Arrangements
SN	Import from Portsmouth Water to Water Supply Work (WSW) near Pulborough PDO +15MI/d MDO +15MI/d ADO +15MI/d	Current bulk transfer	<p>Bulk supply assumptions published in PRT's WRMP24 have since been superseded by the WRMP Annual Review 2025 Technical Note: Southern Water and Portsmouth Water Common Understanding on Bulk Supplies (December 2025).</p> <p>SWS would seek to maximise its import from PRT during a drought event, subject to the terms of the contract. Alternatively PRT may seek to reduce it. This reflects the different impacts that a drought of different severity or duration can have on different supply areas which have different mixes of water sources and demand pressures. As a drought situation develops the companies will hold regular discussions to agree the volumes of bulk supplies. There is uncertainty with regards to the availability of the bulk supply in an extreme (above a 1 in 200 year) drought event. As part of our planning assumptions we have assumed a 50% reduction in supply availability in an extreme drought event based on a best estimate of resource availability however this is not a commitment to the transfer.</p>	<p>There is no formal pain share clause in the current contract. However, upon entering a drought the companies will start a dialogue to agree the approach that would be taken and discuss relevant pain share agreements.</p> <p>Recent discussion with PRT has identified mutual interest in updating the contract document soon. This would be an opportunity to include standard recognition of pain share.</p> <p>SWS assumed a 50% reduction in supply availability in an extreme drought (1 in 500 year severity) event in its WRMP19 based on a best estimate of resource availability. This is not a commitment by Portsmouth Water to provide this volume, rather an estimate for supply-demand modelling purposes in the extreme drought condition. As a drought situation develops the companies would hold regular discussions to agree the volumes of bulk supplies and to discuss the appropriate pain share agreements.</p>

WRZ	Name and Capacity (MI/d) of Bulk Supply	Time constraints	Description	Pain Share Arrangements
SW	Import from Portsmouth Water via North Arundel rather than Pulborough Source PDO +0MI/d MDO +0MI/d ADO +0MI/d	Current bulk transfer	There is a bulk supply agreement from PRT into the Central supply area, which can be brought into the Sussex Worthing WRZ directly at North Arundel. This is intended only for use in extreme conditions when modelling suggests that DO failures would occur in either Sussex North or Sussex Brighton, not Sussex Worthing. This capability would therefore only be required during outage events and not under normal system operation. If the transfer was used it would mean that the 15MI/d import to Sussex North from PRT was not available. There is a net gain of 4MI/d (transfer in 8MI/d, losing 4MI/d of North Arundel output). This option cannot be implemented simultaneously with the option above.	<p>There is no formal pain share clause in the current contract. However, upon entering a drought the companies will start a dialogue to agree the approach that would be taken and discuss relevant pain share agreements.</p> <p>Recent discussion with PRT has identified mutual interest in updating the contract document soon. This would be an opportunity to include standard recognition of pain share.</p> <p>SWS assumed a 50% reduction in supply availability in an extreme drought (1 in 500 year severity) event in its WRMP19 based on a best estimate of resource availability. This is not a commitment by Portsmouth Water to provide this volume, rather an estimate for supply-demand modelling purposes in the extreme drought condition. As a drought situation develops the companies would hold regular discussions to agree the volumes of bulk supplies and to discuss the appropriate pain share agreements.</p>
South East Water (SEW)				
SN	Export to South East Water from Weir Wood reservoir PDO -5.4MI/d MDO -5.4MI/d ADO -5.4MI/d (4.27M/d in a 1 in 500 year drought event)	From 2021/22 to 2030/31, with an option to extend if agreed by both companies.	The agreed contractual volume is 5.4MI/d for the average day and peak day condition. However, during drought periods, the volumes will be subject to change based on discussions involving 'pain share' agreements.	We continue to progress to work towards a final agreement for the export from Weir Wood with South East Water (SEW). A revised contract agreement between both companies has been developed and is currently being formally approved at Executive level. This agreement will formalise the pain share arrangements and will be effective to 2030/31. Although we cannot guarantee the agreed normal maximum volume of the bulk supply contract before 2024 to any extent that supply depends on Weir Wood Water Supply Works, South East Water's typical requirement within the contract can be routinely supported by Southern Water from other sources. The contract terms recognise this. There is regular communication between both companies and trigger levels are in place for drought situations. As trigger levels are approached, there will be discussions as to whether the full agreement volumes can be provided. South East Water has an override trigger (as outlined in section 2 of our plan) which means that they can be agile and take proactive actions depending on what volumes can be provided.

WRZ	Name and Capacity (MI/d) of Bulk Supply	Time constraints	Description	Pain Share Arrangements
SH	<p>The Southern Water export to South East Water at Darwell reservoir is: PDO – 8MI/d* / 12.0MI/d** MDO – 8.0MI/d ADO – 8.0MI/d</p> <p>* 8MI/d over any rolling 28 day period.</p>	<p>Current bulk transfer from present to 2027/28.</p> <p>Supply due to be taken directly from Bewl - date TBC.</p>	<p>SEW are entitled to 12MI/d from Darwell, but under the terms of the contract SEW is permitted to abstract up to 8MI/d over any rolling 28 day period and up to 12MI/d during any period as long as it does not exceed the former condition above. SEW have specified in their draft Dry Weather Plan that they are entitled to 8MI/d and clarified the conditions in their text. Southern Water and SEW are in agreement with the contractual volumes of the transfer from Darwell.</p> <p>The abstraction takes place from Darwell reservoir. There is an intention to alter the Bewl-Darwell transfer to remove the risk of transfer of invasive species into Darwell but the transfer into Darwell is to be maintained until SEW will implement an alternative solution.</p>	<p>In more extreme droughts we have agreed a pain-share arrangement with SEW relating to the availability of supply from Bewl to Darwell reservoirs. SEW has correctly stated that “under developing drought conditions, the supply would be progressively limited to 8/17 of flow in the [Bewl to Darwell transfer] pipeline subject to a minimum of 1MI/day”. We have made reference to this same arrangement in our Drought Plan. Both companies have also made reference to a volume of 4MI/d which has been agreed as the maximum available supply in a 1 in 500 year drought for supply-demand modelling purposes.</p>
KMW	<p>Export to SEW at Bewl reservoir and WSW near Rochester</p> <p>PDO -18.8MI/d (-18.8MI/d in extreme drought)</p> <p>ADO -12.3MI/d (-11.03MI/d in extreme drought)</p>	<p>Discussions are underway to update the agreement during 2026-27</p>	<p>Under the terms of the River Medway Scheme (RMS) agreement, South East Water can take their entitlement at Bewl Water and Burham WSW.</p> <p>The maximum volume of water that South East Water can take at Bewl Water was governed by the River Medway Scheme abstraction licence issued to Southern Water. Southern Water has applied for the Bewl Water abstraction component of the RMS to be transferred to South East Water. It is expected that the new Licences will be effective from 1st April 2026.</p> <p>The overall amount available to SEW from the supplies at Bewl and Burham is defined as 25 per cent of the yield of the RMS. As a drought situation develops the companies hold regular discussions to agree to any restrictions or concessions for bulk supplies as triggers are met.</p>	<p>The nature of the bulk supply will depend on how both companies are affected by any given drought. A pain share agreement will be included in the new contract. When either or both companies experience a drought, they have agreed to discuss the operation of the transfer and relevant pain share agreements.</p>
KME	<p>Export to SEW at Sheldwich</p> <p>PDO -7.39MI/d ADO -6.80MI/d (5.54MI/d PDO and 5.14MI/d ADO in a 1:500 year drought)</p>		<p>As part of the Sheldwich scheme, SEW can take its entitlement. There is also the provision for SEW to pump water into the Eastling main at Stockbury Valley and take water out at another location. However, the net maximum daily and annual average volumes that SEW is entitled to remain the original volumes given in the Sheldwich scheme agreement.</p>	<p>Pain share agreement will be included in the new contract which will be drafted for continuation in 2021. When either or both companies experience a drought, they have agreed to discuss the operation of the transfer and relevant pain share agreements.</p>

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WRZ	Name and Capacity (MI/d) of Bulk Supply	Time constraints	Description	Pain Share Arrangements
Affinity Water (AW)				
KT	Export to AW at Deal PDO / ADO-0.07MI/d Increase to 2.0MI/d in 2025, then -4.0MI/d in 2029	Current bulk supply contract	This was agreed with AW in AMP6	This was agreed with AFW in AMP6. In the event of a drought, we would discuss relevant pain share agreements.
KT	Import from AW at Napchester PDO +0.1MI/d ADO +0.1MI/d	N/A	There is no specific contract for this small supply which is covered under our general terms and conditions of our licence conditions	There is no specific contract for this small supply. In the event of a drought, we would discuss relevant pain share agreements.
Wessex Water (WSX)				
HA	Export to WW PDO -0.41MI/d MDO -0.31MI/d ADO -0.33MI/d	Through the planning period	The volume of the transfer reflects the take over recent years. In the event of a drought we would discuss with WW the relative resource position in the HA WRZ and agree what action is required to mitigate the impact of the drought.	In the event of a drought, we would discuss with WSX the relative resource position in the Chute area and agree the action(s) required to mitigate the impact of the drought as well as discussing relevant pain share agreements. We send two exports to WSX on the eastern side of our boundary near Andover. Liaison with WSX has verified that in the event of a drought we would expect these supplies to be secure during a drought but we would be in regular communication with each other to discuss relative resource positions and the need for flexibility with transfers should the need arise. It may be that pressures to accommodate more constraints on our abstractions in Hampshire may increasingly restrict these transfers during droughts in the future.

3.3. Supplies to major customers

In the event of a severe drought, we would hold discussions with major customers regarding the water resources position and their supplies (Table 3-4). We will follow MOSL Wholesale-Retail Code: Wholesale Contract for Wholesale Services 2017 which clearly sets out the roles and responsibilities for wholesale and retail companies during a drought event. This includes implementation of water efficiency measures and the imposition of TUBs and drought orders which may affect non household customers.

Table 3-4: Summary of Bulk Suppliers to Major Customers

WRZ	Name and capacity of bulk supply	Time constraints	Description	Pain share arrangements
HSE	Export to a large industrial user Max no less than 10MI/d	N/A	We have an agreement to supply a maximum of no less than 10MI/d of treated water from Test surface water to a large industrial user. The user's main source of supply is a transfer from South West Water.	There is no pain share clause, upon entering a drought the companies would open up dialogue to agree the approach that would be taken. We are agreeing a new contract with this industrial water user during 2026.
SH	Export to a commercial customer from Darwell reservoir Max 0.7MI/d	N/A	We have a commercial customer that requires significant volumes of water for its manufacturing activities in East Sussex. Due to the location of the manufacturing plant, we have agreed that the company can take water directly from a gravity-fed main out of Darwell Reservoir. A meter has been installed to measure the volume of water used to enable the company to bill them as a regular commercial customer.	There is no pain share clause, upon entering a drought the companies would open up dialogue to agree the approach that would be taken.

Farms with livestock are classified as Category 4 Sensitive Customers. They are recognised as vulnerable during times of supply interruption, but there are higher priorities such as hospitals. During mains water supply interruptions SWS will provide temporary alternative water supplies on the basis of available resource and prioritisation of the most vulnerable sections of the population. We will make every effort to provide a temporary alternative supply to avoid an impact on farm animal welfare, however in the most severe drought situations, farms may also need to make their own alternative supply arrangements to care for their livestock. Farmers should refer to the website below for further information.

<https://ahdb.org.uk/water-supply-problems-a-guide-for-livestock-farms>

Table 3-4 summarises demand action decision points and drought levels that bulk suppliers to major customers support.

This table is under review.

Table 3-5: Bulk Supply Agreements with Major Customers

Summary	Discuss bulk supply agreements with major commercial customers		
Decision Point	Level 3 triggers	Drought Levels	Level 3
Expected Impact	Uncertain, no pain share clauses exist		
Lead Time	Minimum of 8-12 weeks from TUB		

3.4. Recommissioning of unused sources

We have a limited number of sources that, for a variety of reasons, were never commissioned, have been decommissioned or are subject to long term outages. We maintain a list of these sources and site plans. During a drought, we would consider options for recommissioning these sites, which could include the installation of temporary pumps, headworks and pipework and treatment.

Table 3-6 summarises demand action decision points and drought levels that recommissioning unused sources support.

This table is under review.

Table 3-6: Recommissioning Unused Sources

Summary	Recommission mothballed sources		
Decision Point	Level 2 Primary and Supporting Triggers	Drought Levels	Level 2
Expected Impact	<5M/d of DO		
Lead Time	3-6 months		

3.5. Enhancing abstraction at existing sources

During a drought, we may wish to enhance abstraction at existing sources. These sources could be constrained by the treatment capacity of the works or the capacity of the distribution system. Where the constraint is the hydrological yield of the source or a physical constraint, we will consider further investment in the source to improve its yield. In other cases where the output of the source is limited by the abstraction licence, then we may seek to increase the output by applying for a drought permit/order subject to hydrological and environmental constraints.

We employ industry standard methodologies to determine the DO of each of our sources. In most cases, the amount of water that can be abstracted is limited either by the abstraction licence or the hydrological yield of the source.

We maintain an up-to-date list of the constraints on each of our sources and can respond quickly during a drought to identify schemes where investment will improve the supply-demand balance. However, in some cases these schemes will be complex and require large-scale engineering, which cannot be completed within the normal timeframe of a drought.

Examples of interventions that can be completed during a drought include:

- Physical lowering of pumps or low-level cut outs within boreholes.
- Installing variable speed drive pumps.
- Refurbishment of boreholes.
- Installation of telemetry to allow accurate remote control; and
- Enhanced recovery of long term outage.

Table 3-7 summarises demand action decision points and drought levels that recommissioning unused sources support.

This table is under review.

Table 3-7: Enhancing Abstraction at Existing Sources

Summary	Enhance drought yield from existing sources by adjusting infrastructure and process		
Decision Point	Level 2 primary and supporting triggers - TBC	Drought Levels	Level 2
Expected Impact	<5Ml/d of DO - TBC		
Lead Time	3-6 months, for groundwater sources. Work would need to take place during a dry winter and spring to maximise benefit in the summer and autumn.		

3.6. Distribution network modifications

Modifications to the distribution network, including re-zoning of District Metering Areas (DMAs), can improve the flexibility of the distribution system, allowing us to rest some sources and abstract more water from others. This approach can be particularly useful in areas where there are few other intervention strategies; however, the actual impact on resource availability over the course of a drought may be limited by available supply.

Table 3-8 summarises demand action decision points and drought levels that modifications to our distribution network can support.

This table is under review.

Table 3-8: Distribution Network Modifications

Summary	Modification of distribution network to maximise drought yield and utilisation of available supplies.		
Decision Point	Level 2 primary and supporting triggers - TBC	Drought Levels	Level 2
Expected Impact	TBC		
Lead Time	TBC		

3.7. Water Tankers

The tankering of water from adjacent WRZs and from other companies into WRZs most affected by drought would be considered in a severe drought. The feasibility of this option depends on the availability of water in neighbouring WRZs, as well as practical issues such as tanker capacity and road access. Based on past

drought events, there is likely to be limited resource availability across our supply area and neighbouring companies could be similarly affected and seeking to conserve their resources. We have used tankering historically to address specific localised issues and therefore this remains a measure in our Drought Plan.

Table 3-9 summarises demand action decision points and drought levels that the use of water tankers can support.

This table is under review.

Table 3-9: Water Tankers

Summary	Use of tankers to move water between WRZs or from other companies with surplus		
Decision Point	Level 2 Primary and Supporting triggers	Drought Levels	Level 2 - 4
Expected Impact	Limited supply benefits.		
Lead Time	1-2 Weeks		

3.8. Drought permits/orders (supply-side)

This section needs to be amended once an agreement has been made with regulators about the use of drought permits and drought orders in Hampshire.

When drought conditions lead to or threaten a serious deficiency of supplies, we may require recourse to drought permits/orders in order to increase abstraction and/or conserve water storage to help maintain essential water supplies to our customers.

For existing licensed sources, drought permits/orders are used to temporarily vary abstraction licence conditions to maintain or increase the amount of water that can be abstracted, help conserve reservoir storage or aid winter reservoir refill. The types of abstraction licence changes that may be sought under drought permits/orders comprise one or more of the following:

- Reductions in reservoir releases.
- Relaxation to Minimum Required Flow (MRF) and HoF conditions.
- Increases in the daily, seasonal or annual abstraction volumes authorised in the licence; and
- Variations to groundwater abstraction licence constraints.

Drought permits/orders can also be used to authorise the abstraction of water from a specified water source where there is no existing abstraction licence.

Application for drought permits/orders in winter may be sought in order to:

- reduce the risk of drought permits/orders in the following summer;
- assist the recovery of water supply resources which have been excessively depleted as a result of drought; and
- Maintain water supply in drought affected areas.

Drought permits/orders require applications to be made to the EA or the Secretary of State, respectively. They are granted for specified periods up to a maximum of 6 months and can be extended by up to a further 6 months (maximum limit of 1 year). Each drought permit/order will likely require environmental monitoring and appropriate measures to mitigate adverse environmental effects; further details are provided in the Environmental Monitoring Plan (EMP) (Annex 7).

Drought orders may go further than drought permits. They can deal with discharges of water, abstractions and discharges by individuals or organisations other than the water undertaker affected and can also relate to water supply and treatment obligations.

3.8.1. Our drought permit and drought order options

The drought permit/order options included in this plan are presented in Table 3-10. This includes a summary of the varied licence conditions which would be applied for, the applicable drought trigger for application and the maximum supply benefit. Detailed Environmental Assessment Reports have been updated for each specific drought permit/order in support of the Drought Plan. However, these are not provided with the Drought Plan but are available upon request. Drought Plan level Habitat Regulation Assessment, Strategic Environment Assessment, and Water Framework Directive assessments are also provided (see Annexes 8-10).

Table 3-10: Drought Permits and Orders

This table is under review.

Drought Permit or Order	Water Resource Zone	Primary Hydrological Area Rainfall Series	Supporting Hydrological Area Rainfall Series	SPI and SPEI Drought Triggers available
Lukely Brook, Caul Bourne, Eastern Yar	Isle of Wight	Isle of Wight	n/a	Yes
River Test	Hampshire Southampton West	River Test	Hampshire Tertiaries (for River Blackwater)	Yes for River Test, not for Hampshire Tertiaries
Candover Augmentation Scheme, River Itchen, Lower Itchen	Hampshire Southampton East	East Hampshire Chalk	Hampshire Tertiaries (for Lower Itchen)	Yes for East Hampshire Chalk, not for Hampshire Tertiaries
Pulborough	Sussex North	Western Rother Greensand	n/a	Yes
Weir Wood	Sussex North	River Medway	n/a	Yes
North Arundel	Sussex Worthing	West Sussex Chalk	n/a	Yes
East Worthing	Sussex Worthing	West Sussex Chalk	East Sussex Chalk	Yes
Bowl Water Reservoir / River Medway Scheme	Kent Medway West	River Medway	North Kent Chalk North West Grain Sheppey	Yes except for Sheppey
Darwell Reservoir	Sussex Hastings	Eastern Rother	n/a	Yes

Relationship of our Drought Permit and Order options to EA Hydrological Catchment Rainfall Series and our rainfall triggers based on Standard Precipitation Indices (SPI) and Standard Precipitation and Evapotranspiration Indices (SPEI) to support ESOR Assessment.

The licence changes proposed under drought permits/orders involve a range of temporary licence variations depending on the nature of the source and the existing licence conditions. The changes may include:

- Relaxing the MRF or HoF constraints which prevent abstraction occurring when river flows fall below a particular level for groundwater sources (Lukely Brook, Caul Bourne).
- Relaxing MRF or HOF constraints on surface water abstractions used either for direct supply or for reservoir refill (Eastern Yar, River Test, Lower Itchen, Pulborough, Bewl, Darwell).
- Allowing for the operation of a river augmentation scheme (Candover).
- Reducing the compensation release requirement from a storage reservoir (Weir Wood); and
- Increasing allowable abstraction volumes on a daily basis (North Arundel).

When a licence is temporarily varied under a drought permit/order, the amount of extra water made available under the revised licence conditions can depend on a number of factors, including how the drought progresses, the season and storage conditions in reservoirs and aquifers. If drought conditions worsen, then it is possible river flows or groundwater levels may fall below the revised licence conditions, and the yield benefits of the drought permit/order may be restricted. The yield benefits of licence changes which allow increased abstraction to support storage reservoirs will depend on the levels of the reservoirs at the time of the licence changes.

Table 3-10 includes four drought permit/order options which are required as part of implementation of the Test, Candover and Itchen Interim Abstraction Scheme set out in the Section 20 Agreement. Under this agreement, the Test surface water Drought Permit will need to be applied for in 'normal' conditions and potentially implemented in the 'drought' stage. The Lower Itchen sources Drought Order covers both the abstraction licences of our Lower Itchen sources and Portsmouth Water's abstraction near the tidal limit since any change to the former will have an impact on the latter.

3.8.2. *Exceptional Shortage of Rainfall (ESoR)*

When preparing a case to demonstrate an Exceptional Shortage of Rain (ESoR) in support of a Drought Permit or Order application we will use the latest version of the EA Hydrological guidance for the assessment of an ESOR².

Rainfall monitoring is a key component of our drought triggers and we use a suite of rainfall triggers to monitor the development of drought. These rainfall triggers are based on the Environment Agency Hydrological Area Rainfall series which are derived from the Met Office HAD-UK rainfall dataset and the Environment Agency Daily Rainfall Tool (DRT). When preparing an ESoR case we will use the same catchment rainfall datasets as these can be directly related to our drought triggers and use of catchment rainfall data is consistent with the above guidance. We presently receive these data as monthly totals under licence from the Environment Agency

3.8.3. *Sequencing of drought permit/order implementation*

This section is under review.

² Environment Agency. Hydrological Guidance for the Assessment of an Exceptional Shortage of Rain (ESOR). May 2025, version 2.2.

3.8.4. NEUB Demand Action Decision Points

Table 3-11 summarises demand action decision points and drought levels that drought permits and drought orders support.

This table is under review.

Table 3-11: Drought Permits and Order Decision Points

Summary	Use of drought permits/orders in order to increase abstraction and/or conserve water storage.		
Decision Point	Permit/order preparation and application at Level 1 and 2 triggers. TBC Permit implementation at Level 3 triggers. TBC	Drought Levels	Level 3
Expected Impact	Varies significantly by drought permit and drought order.		
Lead Time	3 – 6 months from preparation to implementation.		