



# DRAFT DROUGHT PLAN

April 2021

(for consultation)

**Albion Water Limited**

[www.albionwater.co.uk](http://www.albionwater.co.uk)

## Document control sheet

Date	29 March 2021
Prepared by	Victoria Ashton Technical Manager
Authorised by	Barry Hayward Managing Director
Email address	Barry.Hayward@albionwater.co.uk
Ref	Draft Drought Plan 2021

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## 1 Introduction

### 1.1 About Albion Water

Albion Water was licensed by the Water Services Regulation Authority (Ofwat) in 1999 and was the first new entrant to operate across the UK. Legally, Albion Water has the same powers and responsibilities as any other incumbent water company in England and Wales, including the requirement to produce a Drought Plan.

Through the NAV (New Appointment and Variation) process, Albion Water currently provides water supply and sewerage services, including sewage treatment, to customers living in new developments in Gloucestershire, Hampshire and Essex and Kent.

### 1.2 Albion Water's Drought Plan Process

New Appointments and Variations (NAVs) have the same duties and responsibilities as other water companies to produce a Drought Plan as stated in Legislation. The preparation and maintenance of a Drought Plan is a statutory duty.

Section 39B of the Water Industry Act (1991) states:

1. It shall be the duty of each water undertaker to prepare and maintain a Drought Plan.
2. A Drought Plan is a plan for how the water undertaker will continue, during a period of drought, to discharge its duties to supply adequate quantities of wholesome water, with as little resource as reasonably possible to drought orders or drought permits.

A drought is defined as a prolonged period of abnormally low rainfall, which has the potential to lead to a shortage of water. A Drought Plan will therefore allow a water undertaker to operationally plan and put measures in place to minimise the risk and impacts of periods of water scarcity.

Albion Water has drafted this Drought Plan in order to comply with the Drought Plan Directions which were updated by Defra in 2020 and by following the process as detailed in Figure 4 in Appendix A.

This Drought Plan details the response Albion Water will take in the event of a drought in order to manage our customers supply to meet our agreed levels of service, as stated in our Water Resources Management Plan 2019.

This Drought Plan has also been prepared through consultation with a variety of stakeholders in accordance with the Environment Agency Guidelines (as detailed in Section 1.3 and Section 1.4).

### 1.3 Pre-consultation

Prior to drafting and publication for consultation of our Drought Plan Albion Water consulted Defra, The Environment Agency, Natural England, Ofwat and incumbent water companies as part of writing the Drought Plan.

## 1.4 Consultation

In accordance with the Environment Agency (EA) guidelines, this Drought Plan was published for public consultation, inviting views from:

- Defra
- Environment Agency
- Natural England
- Ofwat
- Consumer Council for Water
- Drinking Water Inspectorate
- Thames Water
- Essex and Suffolk Water
- Gloucester County Council
- Cotswolds District Council
- Essex County Council
- London Borough of Redbridge

All written representations will be taken into account in the final Drought Plan. All amendments made to the Drought Plan will be detailed in our Statement of Response (SoR) document.

We sent our Drought Plan to Defra on 29<sup>th</sup> March 2021 and after they conduct the appropriate security checks, we will then publish our Drought Plan on our company website and distribute it to our statutory consultees. We have 15 weeks from the date of publication to produce our Statement of Response and we are allowing 8 weeks for public consultation.

## 2 Albion Water sites

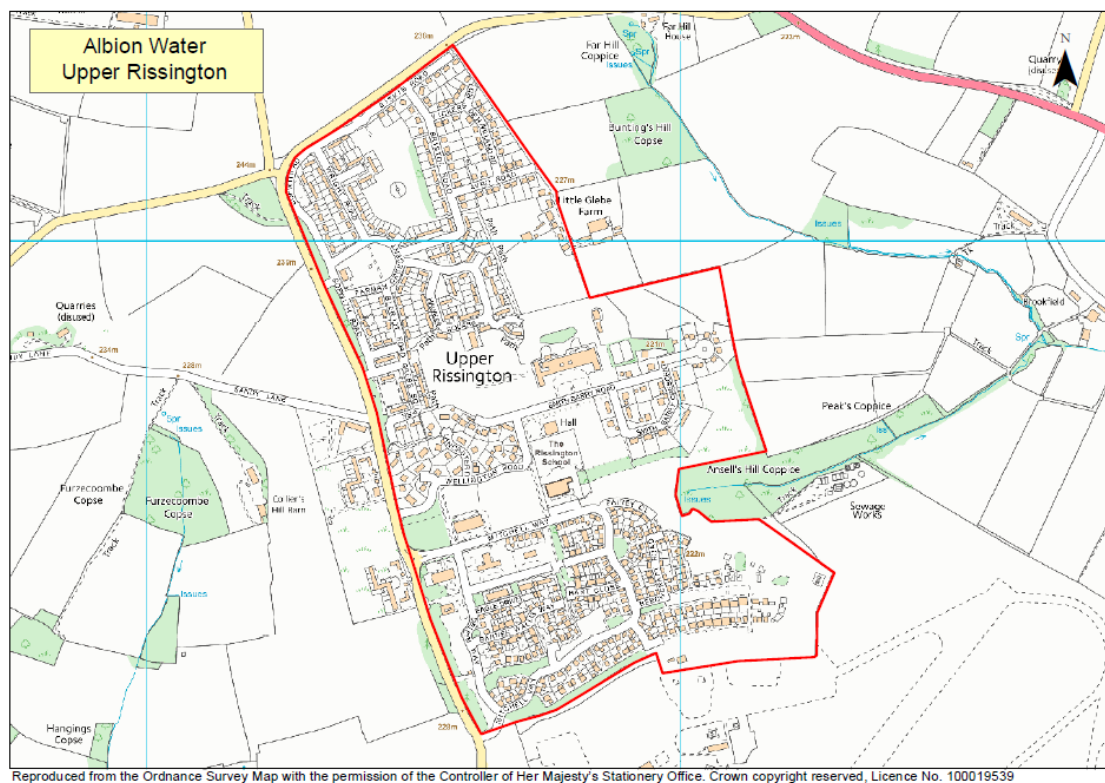
### 2.1 Upper Rissington – Gloucestershire

Upper Rissington is an ex-RAF base which is in the Thames Water area for water supply and sewerage as shown in Figure 1. The site has 350 existing homes in an area called Upper Rissington Village and 368 new build houses in an area called Victory Fields. It was purchased by Linden and Bovis Homes in 2012. Albion Water was contracted to provide full water and sewerage services to the entire site as well as operation of the on-site sewage works. Each new home is connected to a non-potable supply of greenwater which will be sourced from highly treated effluent water derived from the on-site sewage works (see section 2.4 for more information).

Post appointment and after adopting the assets, Albion Water successfully reduced leakage to customers in Upper Rissington village by investigating and fixing leaks within the existing network.

The current bulk supply agreement with Thames Water allows for a maximum daily supply of 307m<sup>3</sup> per day to be taken from the bulk supply point. Thames Water infrastructure is capable of supplying at least three times this volume to the bulk supply points, if ever required. Albion Water will continue to monitor if this ‘reserve capacity’ remains available via the routine liaison meetings with Thames Water.

**Figure 1 The area of the Upper Rissington NAV**

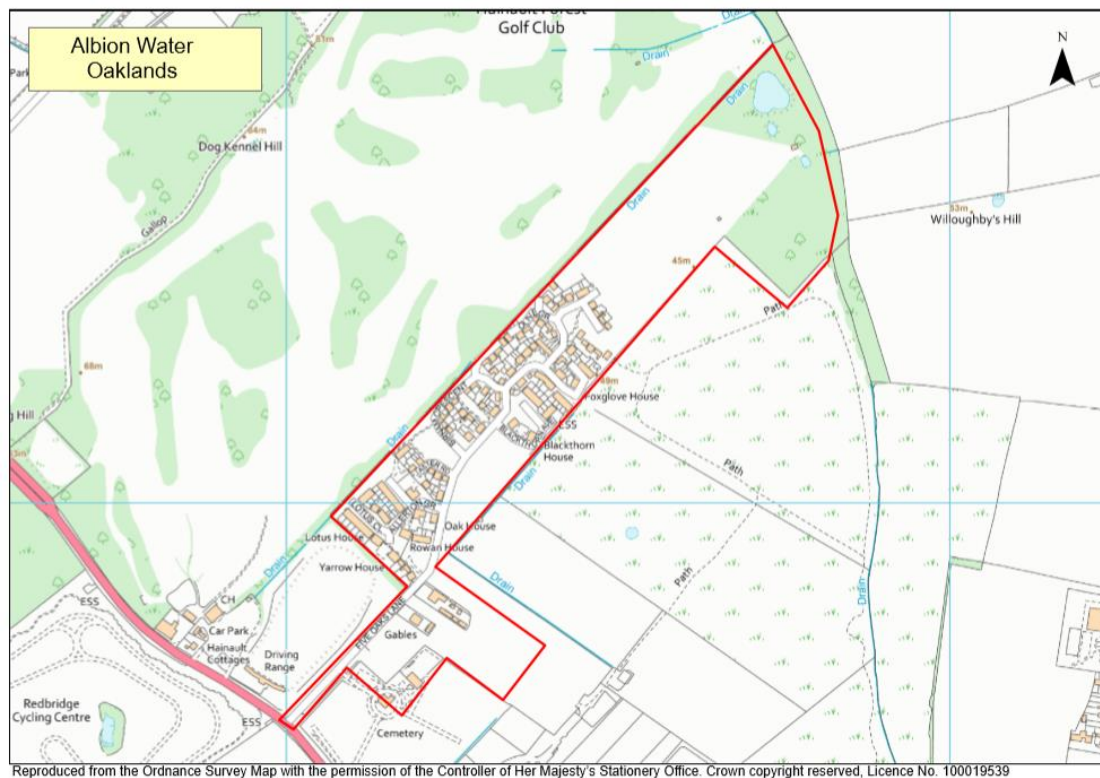


## 2.2 Oaklands Hamlet – Essex

Oaklands Hamlet<sup>1</sup> was an area in Essex & Suffolk for water supply services and Thames Water area for wastewater services. The brownfield site was redeveloped by Countryside Homes and consists of 425 new homes and 25 acres of public open space.

Countryside approached Albion Water to provide water and sewerage services due to the challenging demands associated with developing the site and connecting to the nearest incumbent services.

**Figure 2 The area of the Oaklands Hamlet NAV**



Like at our Upper Rissington site, the new houses are connected to a non-potable supply of greenwater which will eventually be sourced from highly treated effluent water derived from the on-site sewage works. The greenwater feeds the toilets and outside tap in each house and customers pay a reduced tariff for this water. Albion Water routinely inspects the plumbing in each house to prevent cross connections and incoming pipes are fitted with double check valves for extra security.

Albion Water has constructed a small sewage works in a corner of the site which will treat all of the wastewater from the site and provide the non-potable greenwater for toilet flushing and external use.

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<sup>1</sup> Please note: Oaklands Hamlet is now the agreed name for this site in Chigwell, Essex. The current Albion Water WRMP (published in 2019) calls the site Five Oaks Lane which was what it was previously called, but the developer and Albion Water now call this site Oaklands Hamlet and the WRMP will subsequently be changed when the plan is updated.

The non-potable greenwater treatment system is currently in construction phase and not yet commissioned. The sewage works was designed with spare treatment capacity (headroom), so it is capable of accommodating times of higher flows and demand.

The current bulk supply agreement with Northumbrian Water (the parent company of Essex & Suffolk Water) allows for a maximum annual supply equivalent to 85m<sup>3</sup> per day to be taken from the bulk supply point. The agreement also states that Northumbrian Water is able to accommodate reasonable variations (increases) from this amount. Essex & Suffolk Water have confirmed that a greater volume than stated in the current agreement would be available under this clause of the agreement to be agreed with ongoing dialogue and regular communication between water companies.

CASE STUDY: Water supply resilience during Corona virus and Lockdown 2020.

A common question is the resilience of the water supply from the incumbent company during times of peak demand. At both sites we have informal agreements with the incumbent water company that they will be able to meet volumes higher than those stated on the bulk supply agreement. Exactly how much more is not known but will rely on open and ongoing communication between Albion Water and the incumbent water company.

During the Corona virus and associated Lockdown due to Covid 19 and the global pandemic this led to real life scenario testing. We experienced unusually high peak demand at both sites which we comfortably met.

No-one could have foreseen the unusual conditions of Lockdown during the spring of 2020. Lockdown meant that everyone was at home, all day, everyday week after week. This coupled with hot dry warm weather and an increase in handwashing, personal washing, gardening and the purchase of large swimming/paddling pools saw a spike in demand beyond our bulk supply agreements as explained in more detail in Section 2.3.

### 2.3 Bulk Supply Agreements

Both incumbent water companies we have bulk supply agreements with have stated that there is a degree of 'wobble room' with regards to the maximum volumes and both companies are able to deliver in excess of the bulk supply agreement in extreme circumstances. Such an extreme, unusual, unprecedented occasion was the global pandemic and lockdown in 2020. During these times both bulk supply agreements were exceeded, but with ongoing communication between Albion Water and the incumbents this was regularly reviewed.

#### Oaklands Hamlet

Maximum annual volume: 31,000 m<sup>3</sup>

Annual volume 2018: 17,023 m<sup>3</sup>

Annual volume 2019: 28,555 m<sup>3</sup>

Annual volume 2020: 41,112 m<sup>3</sup>

#### Upper Rissington

Maximum annual volume: 112,000 m<sup>3</sup>



Annual volume 2018: 107,844 m<sup>3</sup>

Annual volume 2019: 75,349 m<sup>3</sup>

Annual volume 2020: 153,469 m<sup>3</sup>

The increase in volume at Oaklands Hamlet also reflects the build programme as more properties are built and connected to the network.

During a drought Albion Water has been assured that the volumes specified in the bulk supply agreements will be delivered as the bulk supply agreements are contractual obligations for the incumbent to deliver. Albion Water is effectively a domestic customer of the incumbent water company in perpetuity. Albion Water will mirror the drought triggers and actions of the incumbent company and if any restrictions are put in place then Albion Water will likely do the same to ensure a consistent message of wise water use is encouraged throughout.

## 2.4 Accounting for greenwater

As previously explained new properties at both of our sites have been built with a dual supply system which will allow non-potable water uses to be met with greenwater. Non-potable uses are toilet flushing and garden watering which equates to ~30% of total daily household demand. The greenwater is derived from wastewater effluent which has undergone high levels of further treatment including filtration, UV treatment and chlorination. If there was any problem or outage with the non-potable treatment system, then a backup of potable water would successfully meet the demand.

Albion Water champions water recycling as the most reliable way of reducing per capita consumption below 100 litres per person per day. However, this source of water is also reliable and resilient and will not be affected under drought conditions as 70% of total daily household demand will end up at the sewage works and from this the greenwater will be sourced.

In any water recycling scheme, the water is used twice, that is what recycling means, but it is only consumed once. This is common to other forms of water recycling which reduce per capita consumption such as individual property grey water units and using bath or sink water to flush toilets or to water the garden. What is unusual about the Albion Water system is that we can accurately gauge the extent of this reduction in per capita consumption as although not currently constructed and commissioned, both systems have individual household meters on them. The newly constructed homes have a dual supply distribution system and recycled water feeds the system for toilet flushing and garden watering.

Our Water Resources Management Plan states that a key purpose of providing the recycled water is to provide additional resilience during times of dry weather and drought. However, currently the dual system is currently supplied with potable water and therefore imposing restrictions would be guided by the bulk supply water company and the Environment Agency<sup>2</sup>. This is discussed further in Section 4.

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<sup>2</sup> Our WRMP states that we will impose restrictions in a 1 in a 200 year drought event. We will in fact mirror the actions of the incumbent water company and impose restrictions (TUBS) as they do. This will be updated in the WRMP24.

### 3 Management and Communications

As Albion Water relies on a bulk supply import for our water supply from the incumbent water companies, our drought and communication strategy will largely be driven by theirs. Albion Water will liaise closely with the incumbent water companies (Thames Water at Rissington and Essex & Suffolk Water at Oaklands Hamlet) to ensure a consistent message is relayed to our customers.

Our Drought Mitigation Strategies are twin track;

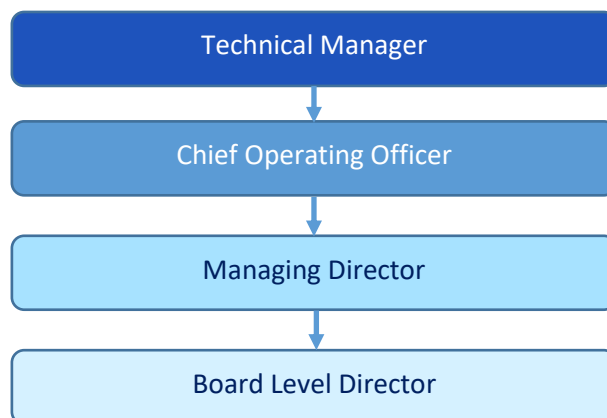
1. Communications with the incumbent water supply water company to ensure our drought actions are aligned and information relayed to customers is consistent,
2. Communications with our own customers to help them reduce their water consumption.

**Table 1 Albion Water Drought Triggers**

Level	Drought action summary
Level 1 Developing Drought	Drought measures: Intensive water efficiency campaign Responsibility – Technical Manager
Level 2 Drought	Drought measure: Imposing a Temporary Use Ban (hosepipe) Responsibility - Chief Operating Officer
Level 3 Ongoing Drought	Drought measure: Drought Order (Non-Essential Use Ban) Responsibility – Managing Director
Level 4 Severe Drought	Drought measure: Emergency Drought Order for rota cuts and/or standpipes Responsibility – Board Level Director

Drought management actions will be managed via the Albion Water Management Team. This team meets weekly to consider operational, commercial and strategic issues and the levels of escalation are shown in Figure 3. As triggers are escalated planned weekly communication with the incumbent water company will be ongoing to ensure proactive engagement and a consistent message and approach.

**Figure 3 Organogram of escalation of Drought Management Team**



### 3.1 Communication with Incumbent Water Companies

As stated, the two incumbent water companies have slightly different drought triggers, drought actions and Levels of Service. During drought conditions it will be important to liaise with the incumbent water companies to understand how the drought measures are being implemented. Early engagement with incumbents is essential so that key messages are aligned and consistent.

### 3.2 Communication with customers

Albion Water operates with two incumbent water companies; Thames Water and Essex & Suffolk Water. It will be important to manage communications with our customers, especially if different customers are experiencing different drought measures, e.g. if restrictions in one area but not the other. PR will closely and carefully manage the messages Albion Water release.

In the first instance Albion Water would directly communicate with customers via a letter drop as this is guaranteed to reach every customer.

#### ALBION WATER CUSTOMER COMMUNICATION STRATEGY

As a small water company Albion Water has an advantage of being able to have a presence on the ground to interact with our customers. Unlike larger water companies as the severity of a drought increases, we can be on site to convey the importance of wise water use to our customers.

Albion Water will be creative with our social media channels (Facebook and Twitter) and use agile communications to interact with our customers. As the severity of a drought continues, we will adopt innovative enhanced communication strategies to engage with our customers to encourage wise water use and water efficient practices in the home.

### 3.3 Drought Stages

Table 2 details the drought actions that Albion Water will implement when the triggers are reached in the event of a developing drought. As an increasingly extreme drought event develops, different actions, timings and personnel will become involved. At all times frequent communication with the incumbent water companies will be paramount.

**Table 2 Albion Water Drought stages and actions**

Level	Strategy, responsibility and escalation level
<p>Level 1</p> <p>Developing Drought</p>	<ul style="list-style-type: none"> <li>- Implement a water efficiency campaign advising customers of possible water shortages and appeal for restraint. Promote water efficient devices. This will be via letter drops and via social media avenues.</li> <li>- Liaise with incumbent water company about possible water shortages. Ensure frequent communication is planned on a weekly basis.</li> <li>- Advise the Environment Agency of the current situation.</li> <li>- Increase demand management activities. Investigate areas of high per capita consumption and increase active leakage control across the entire network.</li> <li>- Consultation and pre-planning on the potential implementation of a Temporary Use Ban (TUB) in line with incumbent water company approaches. We will not impose a TUB before our incumbent.</li> </ul> <p>Drought Team – Technical Manager</p>
<p>Level 2</p> <p>Drought</p>	<ul style="list-style-type: none"> <li>- Full media campaign to reflect the severity of the ongoing drought.</li> <li>- Impose a Temporary Use Ban in line with the incumbent water company position 21 days after Notice has been published.</li> <li>- Ongoing water efficiency and advice campaign with customers using all forms of social media, letter drops and local radio and television. The full media campaign will appeal for ongoing restraint and to impel compliance with the TUB restrictions.</li> <li>- Ongoing discussions with incumbent water companies about the current water shortages and the consistent messages conveyed to customers. Communication at this point will still be on a weekly basis but at this point can agree to increase to a twice weekly basis.</li> <li>- Advise the Environment Agency, Consumer Council for Water and Defra of the current situation and any other stakeholders.</li> <li>- Pre-planning for emergency drought order.</li> </ul> <p>Drought Team – Technical Manager, Chief Operating Officer</p>
<p>Level 3</p> <p>Ongoing Drought</p>	<ul style="list-style-type: none"> <li>- Full media campaign to appeal for ongoing restraint and to impel and encourage compliance with the TUB restrictions to our customers.</li> <li>- Increased frequency of advising the Environment Agency, Consumer Council for Water and Defra of the current situation and any other stakeholders.</li> <li>- Apply for an emergency Drought Order.</li> </ul> <p>Drought Team – Technical Manager, Chief Operating Officer, Managing Director.</p>

Level	Strategy, responsibility and escalation level
Level 4  Severe Drought	Implementation of Emergency Drought Order for Rota Cuts and Standpipes.  Drought Team – Technical Manager, Chief Operating Officer, Managing Director, Board Level Directors.

## 4 Drought Triggers and Levels of Service

Albion Water’s drought management approach is largely controlled by those of the incumbents from which we receive a bulk supply of water.

The contracts with Essex & Suffolk (Oaklands Hamlet) and Thames (Upper Rissington) both require Albion Water to at least match the restrictions they impose on their customers in the area in the event of a drought. We have asked both companies to confirm their policies on restrictions and these are set out below.

Whilst not undermining what we have stated in our WRMP about the resilience our non-potable dual supply system, an escalating drought is an unusual operational event. As such Albion Water will mirror the actions of then incumbent water company and impose restrictions as they do as which is a requirement of our bulk supply agreements.

### 4.1 Upper Rissington

Thames Water Drought Plan and WRMP are based on the following principles;

- The need to maintain security of supply for Thames Water’s customers
- The level of restrictions imposed on customers is commensurate with Thames Water’s Levels of Service (LoS).

The planned Levels of Service for water supply restrictions adopted by Thames Water are set out below in Table 3.

**Table 3 Thames Water Levels of Service**

Restriction Level	Frequency of Occurrence	Water Use Restrictions
Level 1	1 year in 5 on average	Intensive media campaign
Level 2	1 year in 10 on average	Sprinkler/unattended hosepipe ban, enhanced media campaign
Level 3	1 year in 20 on average	Full Temporary Use Ban (formerly hosepipe ban), Drought Direction 2011 (formerly non-essential use bans) requiring the granting of an Ordinary Drought Order *
Level 4	Never ** (1 in 125 year on average)	If extreme measures (such as standpipes and rota cuts) were necessary, this would require the granting of an Emergency Drought Order

[\* Drought Permits are also part of Level 3 measures, but do not impinge directly on customers and so are not strictly relevant to customer service levels.

\*\* Under Level 4, 'never' means that, providing future droughts are no more severe than the most severe in the historic record over which London's supply capability has been simulated, extreme restrictions will not be required and Thames Water would never plan to include this measure as part of its operating strategy. Thames Water has tested its Drought Plan against more severe droughts than have been experienced in the historic record]

These Levels are based on the historic record of droughts from the 20<sup>th</sup> century. During their WRMP19 Thames undertook some stochastic forecasting to model a worst-case scenario which had an estimated occurrence of approximately 1 in 125 year frequency. In their Drought Plan 2017 they have shown that they are currently resilient to more severe droughts than 1 in 125 year events and they would be able to maintain supply during a 1 in 200 year drought event but this requires the use of drought permit options and hence is dependent on the agreement of the EA and Secretary of State.

## 4.2 Oaklands Hamlet

In their Drought Plan, Essex & Suffolk Water state that every drought is different in the sense that rainfall may be very low at different times of the year (e.g. a dry winter or a dry spring). High demand for water in a hot summer may follow on from a dry winter or a wet winter. Depending on how these different factors come together determines what drought actions Essex & Suffolk Water adopt and when to implement them.

Table 4 details the Levels of Service Essex & Suffolk operate within as stated in their most recently published Water Resources Management Plan and Drought Plan.

**Table 4 Essex & Suffolk Water Levels of Service**

Restriction Level	Frequency of Occurrence	Water Use Restrictions
Level 1	1 year in 10 on average	Appeal for restraint
Level 2	1 year in 20 on average	Phase 1: Temporary water Use Ban
Level 3	1 year in 50 on average	Phase 2: Drought Order Ban
Level 4	1 year in 250 on average	Pressure Reduction

**WIA Section 76 - Temporary hosepipe bans:** 1:20 or 5% risk – will stay the same over the 25 year planning horizon.

**WRA Section 74(2)(b) - Ordinary drought order:** 1:50 or 2% risk – will stay the same over the 25 year planning horizon.

**WRA Section 75 - Emergency drought order:** 1:250 or 0.4% risk – will stay the same over the 25 year planning horizon.

Under a 1 in 200 year drought scenario, they expect to impose up to Level 3 restrictions. These are defined in their drought plan as follows:

These are far rarer (1 in 50 years) but when they are put in place it will always be after a Temporary Use Ban has already been implemented. The Drought Order Bans basically ban what has been applicable to the domestic customer under the Temporary Use Ban, to non-domestic or commercial

customers. Albion Water does not have any non-domestic customers and so will never impose this restriction.

The deployable output for their Essex Water Resource Zone is calculated using their Essex Aquator model. This uses naturalised flows from 1910 to 2016 and includes their design drought year of 1920/21. They have reviewed the frequency of the restrictions that would have been imposed and have concluded that they would be less frequent than that of their stated levels of service.

## 5 Drought Measures

### 5.1 Normal Operation (Business as usual)

Albion Water has a Statutory obligation to always encourage our customers to use water wisely and give advice on water saving tips around the house and in the garden. Albion Water has such advice on the website<sup>3</sup>.

In addition, general demand management measures are undertaken by Albion Water including leakage management and metering.

### 5.2 Water Efficiency Media Campaign

At the first drought trigger Albion Water would conduct a water efficiency campaign which would involve conveying key water saving messages to our customers in relation to using water wisely and urging them to use restraint. This is especially important as Albion Water is unable to adopt and supply side measures during a drought.

Evidence has shown that appeals for restraint may result in average demand reductions ranging from 0 to 5%<sup>4</sup>. Essex & Suffolk Water evidence and experience has shown that reduction in demand can be as much as 7%.

As the majority of Albion Waters properties are metered customer consumption from meter reads will be monitored to identify high users and/or possible leakage problems. Education, advice and raising awareness of using water wisely will be an ongoing activity throughout this phase to all of our customers. Enhanced communications using all forms of social media would be ongoing as described in Section 3.2.

All customer service staff are trained on how to advise customers on water efficiency and direct them to further information online about how they can control their own usage.

### 5.3 Temporary Use Bans

As a drought escalates Albion Water will look to apply for a Temporary Use Ban (TUB) (formerly called a Hosepipe Ban) in line with the incumbent water company. This restricts customers from using a hosepipe or sprinkler.

Albion Water assumes an additional demand reduction of 5% (cumulative with the 7% saving made from an appeal for restraint) is estimated in response to a temporary use ban. This is based on evidence from previous hosepipe bans and also accounting for the temporary use ban including all hose pipe use (not just domestic gardens). This 5% saving does however assume there are no exemptions to the TUB. These assumptions are based on Thames Water and Essex & Suffolk Water demand savings in their Drought Plans which were based on the analysis of data collected during the 2003 drought<sup>5</sup>.

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<sup>3</sup> <https://www.albionwater.co.uk/customer/my-water/saving-water>

<sup>4</sup> UKWIR/Environment Agency, 1998

<sup>5</sup> UKWIR demand management project, 2007



### Powers Used

The ability to impose restrictions on customers come from the following powers;

- Section 76 of the Water Industry Act 1991, as amended by Section 36 of the Flood and Water Management Act 2010 and,
- The Water Use (Temporary Bans) Order 2010, which is a statutory instrument providing definitions of words and phrases and certain exceptions to the categories of water use in Section 76 of the WIA 1991 (as amended by the FWMA 2010)

### Consultation on TUBS

According to the WIA 1991 Section 76B(2) to implement a Temporary Water Use Ban (TUB) a company must adopt the following procedure;

*“Before the period for which a prohibition is to apply the water undertaker must give notice of the prohibition and its terms;*

- a. in at least two newspapers circulating in the area to which it is to apply, and*
- b. on the water undertaker’s internet website”*

The notice of prohibition must set out clearly the terms and extent of the proposed prohibition and specify the date on which the prohibition will commence and the area to which the ban will apply. Albion Water must also provide details of how customers can make representations about the proposed prohibitions to us and leave a reasonable period for the representations to be made.

Albion Water considers a reasonable period to be 21 days from when the Notice of the prohibition is posted on our website. This time period allows the advertisement of the ban to appear in the local newspapers, which may only be published weekly, and 14 days for representations to be made as a result of the newspaper advertisement. This also aligns with both Thames Water and Essex & Suffolk Waters policies. Albion Water will apply at the same time as the incumbents do.

## 5.4 Drought Orders

As a drought escalates (Level 5 Drought Actions) then further restrictions will have to be implemented. These are far rarer and will always only be imposed after a Temporary Use Ban has already been implemented.

### Drought Order – Non Essential Use Ban (NEUB)

The next step would be to implement Drought Order Bans which is an extension of a Temporary Use Ban to non-domestic or commercial customers. These bans have economic consequences for businesses and have to be used as sparingly as possible.

Albion Water will mirror our incumbent water supplier about the implementation of NEUB under the Drought Direction 2011. Albion Water would intend to apply for powers to ban all of the activities open to us, but only apply each restriction, when necessary and beneficial in terms of water savings and economic impact.

Albion Water however does not have any non-domestic customers at Oaklands Hamlet. At Upper Rissington there are a handful of non-domestic customers (a small Co-op supermarket, a charity shop, and a pharmacy. The café has permanently closed) and there are also a couple of office buildings.

Total daily measured demand for all non-domestic customers is 0.003 MI/day. Technically Albion could apply for and impose a NEUB but this would achieve very little water saving.

## 5.5 Emergency Drought Orders

An Emergency Drought Order (EDO) is the most severe customer restrictions Albion Water can impose in a drought under the Drought Direction 2011. These severe restrictions would mirror the incumbents and would only ever be considered if the supplies from the incumbent water company were severely depleted.

An application would be made to Defra to grant the Emergency Drought Order which would include being able to introduce rota cuts and stand pipes.

Both Essex & Suffolk Water and Thames Water state in their Drought Plan and Water Resources Management Plan that the likelihood of needing an EDO is greater than a 1 in 125 year event or 'never'.

## 6 Environmental impact

Albion Water does not operate any of its own water sources and we buy a bulk supply of water from the incumbent water provider. The environmental impacts of abstraction are therefore an issue to be managed by Thames Water and Essex & Suffolk Water. Consequently, no environmental assessment is appropriate.

## 7 Monitoring impacts

We will monitor the impact of the drought measures we impose by monitoring the bulk supply volumes imported. This monitoring will allow us to assess the impact of the measures and ensure we stay within the contractually agreed volumes.

After a drought we can assess the impact on individual customers use, including the potable / non-potable split at both a property and network level.

## 8 Resilience

The bulk supply agreements have clauses in them which relate to resilience, in particular the actions to be taken by both parties should there be a problem in maintaining the bulk supply. These include the provision of an alternative back up connection or an alternative supply of water by bowser, temporary mains, bottled water or otherwise.

## 9 How to respond to this draft Drought Management Plan

Representations on this plan should preferably be entitled 'Drought Plan Consultation – Albion Water' and emailed to [water.resources@defra.gov.uk](mailto:water.resources@defra.gov.uk) and to [Victoria.Ashton@albionwater.co.uk](mailto:Victoria.Ashton@albionwater.co.uk)

Alternatively, hard copies can be posted to:

Secretary of State, Department for Environment Food and Rural Affairs (Defra)  
Albion Water Drought Plan Consultation  
Water Resources  
Department for Environment Food and Rural Affairs  
3rd Floor  
Seacole Building  
2 Marsham Street  
London  
SW1P 4DF

## Appendix A

**Figure 4 Statutory process for the development of a Drought Plan (source EA Guidance)**



13. Direct companies to amend draft drought plan if necessary

14. Object to direction on basis of commercial confidentiality if necessary

15. Confirm direction or issue new direction

16. Prepare final drought plan

**Prepare final drought plan**

17. Direct companies to publish final drought plan after checks

18. Publish final drought plan

**Key to party responsible for each step**

-  Water companies
-  Water companies and third parties
-  Secretary of State / Environment Agency